

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PROVISUR TECHNOLOGIES, INC.,
Petitioner,

v.

TEXTOR MASCHINENBAU GMBH,
Patent Owner.

Case IPR2024-00224

U.S. Patent No. 9,457,487 B2

REMOTE DEPOSITION OF

JOHN MEYER, PH.D.

Zoom Recorded Videoconference

09/18/2024

1:05 p.m. (EDT)

REPORTED BY: AMANDA GORRONO, CLR

CLR NO. 052005-01

DIGITAL EVIDENCE GROUP

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Provisur EX1053
U.S. Patent No. 9,457,487

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09/18/2024

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1:05 p.m. (EDT)

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REMOTE DEPOSITION OF JOHN MEYER,

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Ph.D., held virtually via Zoom

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Videoconferencing, before Amanda Gorrone,

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Certified Live Note Reporter, and Notary

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Public of the State of New York.

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1 A P P E A R A N C E S

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Page 4

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I N D E X

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WITNESS

EXAMINATION BY

PAGE

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JOHN MEYER, Ph.D.

MR. FELDHAKE

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E X H I B I T S

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EXHIBIT

DESCRIPTION

PAGE

8

Exhibit

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2007

Excerpt of report of John Meyer, Ph.D.....

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1 JOHN MEYER, Ph.D., called as a witness, having
2 been first duly sworn by a Notary Public of the
3 State of New York, was examined and testified as
4 follows:

5 THE WITNESS: Yes.

6 THE COURT REPORTER: Can you state
7 your name and address for the record?

8 THE WITNESS: John Meyer. And the
9 address is 40W373 Edgar Lee Masters Lane, St.
10 Charles, Illinois.

11 THE COURT REPORTER: Thank you.

12 MR. FELDHAKE: And my name is Mitch
13 Feldhake here on behalf of Petitioner,
14 Provisur Technologies, Inc., from the law
15 firm Willkie Farr & Gallagher.

16 Also on the Zoom with me is Mike
17 Babbitt.

18 MR. HORTON: And Hunter Horton with
19 erise IP on behalf of Patent Owner, Textor.

20 EXAMINATION

21 BY MR. FELDHAKE:

22 Q. Good afternoon, everyone.

1 Dr. Meyer, could you please state
2 your full name for the record?

3 A. Sure. John Edison Meyer.

4 Q. And is there any reason that you
5 might not be able to provide full and truthful
6 testimony today?

7 A. I don't believe so.

8 Q. And do you know why you're here
9 today?

10 A. I know why I believe I'm here.

11 Q. And why do you believe you're here?

12 A. Due to my declaration and
13 Exhibit 2007 related to the IPR proceeding.

14 Q. And so do you understand that you're
15 here to provide testimony in IPR2024-00224
16 regarding US Patent No. 9,457,487?

17 A. Yes, with the provision that my
18 understanding is it's limited to my declaration
19 and an excerpt from my original report.

20 Q. Okay. So if I refer to the '487
21 patent, will you understand what I'm referring
22 to?

1 A. I will.

2 Q. And you understand that this IPR is
3 between Textor Maschinenbau GMBH and Provisur
4 Technologies, Inc., correct?

5 A. That's my understanding, yes.

6 Q. So the history of litigation between
7 the parties have often involved Weber instead of
8 Textor, so I may slip up today and use "Weber"
9 instead of "Textor." If you feel the need to
10 clarify any of your answers, if you want me to
11 rephrase my questions to make that clarification
12 clear, just let me know. I'm happy to do so.

13 A. Okay. I might make that same slip.

14 Q. All right. We can help each other
15 out then.

16 Let's see. Have you been asked to
17 perform any work for Textor in relation to the
18 district court proceedings involving the '487
19 patent?

20 A. In which I performed the -- my --
21 submitted my initial reports?

22 Q. Yes.

1 A. I'm not quite sure I'm understanding
2 the question.

3 Q. Can you describe any work that you
4 have done for Textor in connection with the
5 district court litigation involving the '487
6 patent?

7 A. I guess I'm not certain how to
8 really separate my work between Textor and Weber.
9 I am -- my understanding is Textor is basically a
10 subsidiary of Weber. And so my work for Weber,
11 to the extent that it pertains to Textor
12 machines, like, for example, the TS500, would
13 pertain to the Textor machines and before Textor,
14 I guess, but ultimately the parent company Weber
15 is also my -- my end-client I guess.

16 Q. Okay. So I'm just trying to
17 understand what you did for, I guess, Weber and
18 Textor. I'm not trying to like draw a line is
19 there in the district court. I guess I just want
20 to make the record of what your involvement was
21 and what you did in connection with the district
22 court proceeding for the '487 patent?

1 A. Sure.

2 For the '487 patent I believe I
3 looked at the infringement of that patent by
4 various machines, as well as particularly for
5 what we're going to be talking about today. I
6 believe the fact that Weber's machines or
7 Textor's machines are commercial embodiments of
8 that patent. I believe I also addressed the
9 validity of the patent.

10 Q. And is it your understanding that
11 the excerpt of your report, which is
12 Exhibit 2007, is an excerpt of your infringement
13 report from the district court?

14 A. Yes.

15 Q. Have you read any other materials
16 from the district court such as briefs, motions,
17 or orders?

18 A. Well, not recently. When I was
19 preparing the my initial set of reports that I
20 was deposed on back in, I think, June or July, I
21 may have reviewed some of the district court's
22 rulings and some of the various legal documents

1 related to that. But nothing pertaining to this
2 particular proceeding or of the IPR.

3 Q. And did any of those documents that
4 you previously reviewed inform any of your
5 analysis contained in Exhibit 2007?

6 A. I don't believe so. No.

7 Q. How many times have you been deposed
8 before today, Dr. Meyer?

9 A. I don't have an exact total, but it
10 would be somewhere over 100.

11 Q. Okay. So you've done this a few
12 times. But -- so I won't belabor the logistics
13 here. I will go over a quick few basics.

14 You understand today I will be
15 asking you questions and unless your counsel
16 instructs you not to answer, you'll be providing
17 answers; is that correct?

18 A. That's my understanding.

19 Q. And if you don't understand any of
20 my questions today, please just let me know and
21 I'll see if I can clarify.

22 Sound good?

1 A. I will try to do that, yes.

2 Q. I will try to take a break
3 approximately every hour. If you need breaks
4 more often than that, please just let me know. I
5 just ask you answer any pending questions before
6 we go on a break.

7 Okay?

8 A. Sure.

9 Q. Great.

10 Can you please describe for me what
11 you did to prepare for today's deposition?

12 A. Sure.

13 I read my declaration. I read the
14 excerpt from my report. I looked at the
15 operators' manuals for the TS500, the TS700, the
16 TS750, and weSLICE 9500. Specifically as it
17 relates to removing the pertinent conveyor belts
18 or conveyors. And I did a word search of my
19 depos looking for what I had said about removable
20 conveyors during my depositions earlier in the
21 year.

22 Q. And why did you do a word search of

1 your previous depositions regarding the removable
2 conveyors?

3 A. Just wanted to refresh my memory as
4 far as what I had said. And I didn't want to
5 take the time to read the entirety of the
6 11 hours or so of deposition testimony, so it cut
7 my time down drastically.

8 Q. Approximately how long did you
9 review your declaration for this proceeding when
10 you were preparing for today?

11 A. Well, not very long. A few minutes.
12 I mean the declaration is a page, so, about as
13 long as it took to read it. I read it a couple
14 of times at various points.

15 Q. And approximately how much time did
16 you spend reviewing Exhibit 2007 in preparation
17 for today?

18 A. It's a little harder to say. I read
19 through it a number of times. And obviously as I
20 was reading through it, I also looked at
21 operators' manuals pertaining to, for example,
22 the removable of the [REDACTED] conveyor for the

1 TS500. So it's a little hard for me to separate
2 those. But it took a little while to read
3 through and examine the diagrams in the
4 photograph or the pictures, the figures. But
5 only, you know, some total time of a few hours.

6 Q. Would you guess that was less than
7 four hours?

8 A. Yes.

9 Q. Okay. Did you review any of the
10 briefs that were submitted in this IPR
11 proceeding?

12 A. No.

13 Q. Did you review any other expert
14 reports or declarations that were submitted in
15 this IPR proceeding?

16 A. No.

17 Q. Did you speak with any attorneys
18 when preparing for today?

19 A. Yes.

20 Q. Approximately how long did you speak
21 with your attorneys?

22 A. Maybe on the order of an hour.

1 Q. Okay. Are you prepared to testify
2 today regarding the contents of Exhibit 2007 from
3 IPR2024-00224?

4 A. I believe so, yes.

5 Q. Are you prepared to testify today
6 regarding any of the other portions of your
7 district court report that were not contained in
8 Exhibit 2007?

9 A. It's nothing I prepared for, so it's
10 depending, I guess, on what the question may be.
11 But for the most part, that's not what I was
12 anticipating testifying about, so not necessarily
13 prepared to discuss matters related to that.

14 Q. When did you become aware that an
15 excerpt of your district court report was
16 submitted in this IPR proceeding?

17 A. I believe in July of this year.

18 Q. Are you aware that Textor submitted
19 other declarations and expert reports in this
20 proceeding?

21 A. Good question. I guess I probably
22 assumed that, but I'm not aware of the details of

1 any other declarations that may have been
2 submitted. So I don't know. I don't know
3 anything really, other than just kind of making
4 assumptions.

5 Q. So you wouldn't know the name of any
6 other declarants in this proceeding, if there
7 were any?

8 A. I do not.

9 Q. Okay. So now I'm going to turn to
10 and focus on Exhibit 2007 from this proceeding.

11 (Whereupon, Exhibit 2007, Excerpt of
12 report of John Meyer, Ph.D, was marked for
13 identification.)

14 BY MR. FELDHAKE:

15 Q. How did you determine which excerpts
16 of your district court report to submit in this
17 proceeding?

18 A. Well, my understanding is the
19 excerpt was to address the fact that these Weber
20 or Textor machines are commercial embodiments of
21 the '487 patent, and this is the section from my
22 report which addresses that specific topic.

1 Q. And what is your understanding of
2 the term "commercial embodiments" in the context
3 of patent law?

4 MR. HORTON: Objection. Calls for a
5 legal conclusion.

6 A. I guess I would preface this by
7 saying I'm certainly not a patent attorney. So
8 those words may be charged words that contain
9 specific -- that had specific meaning legally.

10 To me what it means is that these
11 are machines that are physical embodiments of the
12 claims or at least a claim of the '487 patent.

13 BY MR. FELDHAK:

14 Q. Do you know what are secondary
15 considerations in patent law?

16 MR. HORTON: Same objection.

17 A. In terms of secondary indicia of an
18 invention, I am -- yes, I am not really, I don't
19 think, prepared to talk about that with respect
20 to these products, but I believe I know generally
21 what that entails.

22 BY MR. FELDHAK:

1 Q. And what is your understanding of
2 what secondary indicia are in patent law?

3 A. I believe it's indications that
4 would lead one to believe that an invention
5 contained in a patent is a true invention and
6 that it is, you know, an actual novel
7 breakthrough sort of advancement.

8 Q. Did you provide any opinions in
9 Exhibit 2007 that are related to secondary
10 indicia?

11 A. Not to my knowledge, no.

12 Q. Do you know what is nexus in patent
13 law?

14 MR. HORTON: Objection. Calls for a
15 legal conclusion.

16 A. Yes and no. I don't know if I'm
17 terribly comfortable trying to -- without
18 refreshing my memory what exactly that -- you
19 know, that legal concept is, but essentially I
20 believe it pertains to a link between, for
21 example, a patent or an invention and, for
22 example, the commercial success of a machine.

1 BY MR. FELDHAKE:

2 Q. Did you provide any opinions in
3 Exhibit 2007 related to nexus?

4 A. No, I don't believe so.

5 Q. Did you provide any opinions in
6 Exhibit 2007 that are related to copying?

7 A. No.

8 Q. Did you provide any opinions in
9 Exhibit 2007 that are related to long-felt need?

10 A. No.

11 Q. Did you provide any opinions in
12 Exhibit 2007 that are related to commercial
13 success?

14 A. No, I did not.

15 Q. Did the excerpts of your report in
16 Exhibit 2007 generally relate to which Textor and
17 Weber products embody the '487 patent?

18 A. I believe it relates to four of the
19 Weber or Textor products which embody the patent.

20 Q. Do you know if any other Textor or
21 Weber products embody the '487 patent?

22 MR. HORTON: Objection. Form.

1 A. I haven't done an analysis of other
2 machines that may also practice the '487 patent.
3 My understanding is that S6 could possibly, but I
4 haven't done that analysis so I can't, as I sit
5 here, tell you one way or another.

6 BY MR. FELDHAKE:

7 Q. Why did you not analyze the S6?

8 A. I just wasn't tasked to do that
9 analysis. So it was not part of the work I was
10 asked to do.

11 Q. And why did you analyze the weSLICE
12 9500, TS500, TS700 and TS750?

13 A. Those machines, I was asked to look
14 at and analyze them with respect to them
15 practicing the '487 patent.

16 Q. Can you explain to me the process
17 you used when analyzing whether the weSLICE 9500,
18 TS500, TS700, or TS750 embodied the '487 patent?

19 A. Sure.

20 Well, I think if you -- we look or
21 go through Exhibit 2007, which contains sort of
22 the -- that analysis, I went by and analyzed

1 claims 1 and 16. And for claim 1, broke it up
2 into each claim element and compared the claim
3 element to the machine or each of the four
4 machines to see whether or not those machines met
5 that claim element. And each of those four
6 machines met the claim elements for each of claim
7 1 and claim 16.

8 Q. And why did you decide to analyze
9 claims 1 and 16?

10 A. I believe those were pertinent
11 claims that were being practiced by the -- the --
12 those machines and which were being asserted by
13 Weber or Textor.

14 Q. Is it your understanding that there
15 is a difference between claim 1 and claim 16?

16 MR. HORTON: Object to form.

17 A. I think certainly there is a
18 difference between the two, yes.

19 BY MR. FELDHAKE:

20 Q. And what is the difference between
21 claim 1 and claim 16?

22 A. Well, claim 1 is certainly longer.

1 It certainly spells out the details of what we
2 are dealing with in the sense of it's talking
3 about a slicing machine. Claim 16 adds the
4 specificity of -- it depends from claim 1 so it
5 adds all the elements of claim 1 but also
6 specifically indicates that the conveyor can be
7 removed without or configured without tools.

8 Q. So does claim 1 not specifically
9 indicate that the conveyor can be removed without
10 tools?

11 MR. HORTON: Object to form.

12 A. Claim 1 is -- does not mention tools
13 specifically.

14 BY MR. FELDHAKE:

15 Q. Do you know what is the TS700 Flex?

16 A. I would have to review to see. I'm
17 not familiar offhand of what the Flex might stand
18 for.

19 Q. So sitting here today, you're not
20 familiar with the TS700 Flex; is that correct?

21 A. I'm not familiar with that
22 terminology. That's correct.

1 Q. Have you ever seen a TS500 in
2 person?

3 A. Not in person.

4 Q. Have you ever seen a TS700 in
5 person?

6 A. I have not seen a TS700 in person.

7 Q. Have you ever seen a TS750 in
8 person?

9 A. No, I have not.

10 Q. Have you ever seen a weSLICE 9500 in
11 person?

12 A. No, I have not.

13 Q. Did you analyze any Weber or Textor
14 products to determine if they practiced the '487
15 patent that do not appear in Exhibit 2007?

16 A. No.

17 Q. So every product you analyzed
18 embodies the '487 patent; is that correct?

19 A. With respect to the '487 patent and
20 whether it's practicing the '487 -- whether
21 Weber's machines are practicing the '487 patent,
22 it was just these four machines.

1 Q. Do you know if any other Weber
2 products practice the '487 patent?

3 A. I think as we discussed briefly
4 previously, I have not analyzed any other
5 machines, so I don't know specifically if others
6 may. My understanding is that the S6 machine
7 may, but I didn't perform that analysis, so I
8 just can't say at this time.

9 Q. Do you know if any other Textor
10 products practice the '487 patent?

11 A. Essentially, no. And I have not
12 analyzed any other machines with respect to the
13 '487 patent.

14 Q. Do you know if the weSLICE 9500
15 embodies any other Weber or Textor patents?

16 MR. HORTON: Objection. Scope.

17 A. I believe it does, but I'm not
18 really -- don't know that I'm prepared to answer
19 that, just from the standpoint that I haven't
20 reviewed any of my reports to refresh my memory
21 as far as the weSLICE 9500 and any other patents.

22 BY MR. FELDHAKE:

1 Q. Do you know if the TS500 embodies
2 any other Textor or Weber patents?

3 MR. HORTON: Objection. Scope.

4 A. Again, without reviewing material
5 related to the TS500, I'm not really prepared to
6 give an answer for that, as I sit here right now.

7 BY MR. FELDHAKE:

8 Q. And would it be the same answer if I
9 asked you that about the TS700 and the TS750?

10 A. It would.

11 Q. Can you please turn to Paragraph 568
12 of Exhibit 2007.

13 If I refer to the TS500, TS700 and
14 TS750, and weSLICE 9500 as Textor's removable
15 conveyor products, would you understand that to
16 include all of those products?

17 A. I think, yes.

18 Q. Okay. Do the Textor removable
19 conveyor belt products include features that are
20 not described in the claims of the '487 patent?

21 A. Can you repeat that, please?

22 Q. Do the Textor removable conveyor

1 belt products include features that are not
2 described in the claims of the '487 patent?

3 A. I would have to say almost
4 certainly, yes, the -- the design and function
5 and features of these conveyors is not solely
6 dictated by the '487 patent. There's more to
7 them than just that.

8 Q. So I think you just said the design
9 and function and features of these conveyors.
10 Did you mean slicers?

11 A. I thought you were just talking
12 about the conveyors. Are you referring to the
13 entire machines?

14 Q. Yeah, I was trying to use the,
15 quote, Textor's removable conveyor belt products
16 to encompass the machines.

17 A. Okay.

18 Q. I can see -- I'll reask the question
19 but I'll break it out by machine. Maybe that's
20 not the most efficient way to do it is by using
21 that terminology. Just give me a moment to
22 phrase this.

1 A. Do you need --

2 Q. Sorry.

3 A. Sorry. I was just being a little
4 dense.

5 Q. No. No. No. It's okay.

6 Okay. Do the TS500, TS700, TS750,
7 and weSLICE 9500 slicers include features that
8 are not described in the claims of the '487
9 patent?

10 A. Sure. Absolutely.

11 Q. And can you describe some of those
12 features?

13 A. Well, possibly, but, I mean, I'm not
14 really -- that's not really what I was
15 anticipating trying to discuss today. So it's
16 not something that I'm really going to give you a
17 very good answer concerning. But these are very
18 complicated machines. They transport food
19 products, they slice food products. And they do
20 that in a very sophisticated manner and high
21 speed manner. So there's lots of different
22 facets related to the machine's design and the

1 way they are -- the way they are made to
2 basically accomplish that task which is unrelated
3 specifically to the '487 patent.

4 Q. You reviewed the manuals for the
5 TS500, TS700, TS750, and weSLICE 9500 in
6 preparation for today; is that correct?

7 A. Not in their entirety, but with
8 respect to the removable of those conveyors from
9 the machines and basically the reintroduction of
10 those conveyors into the machines.

11 Q. Do you know when the manuals for the
12 TS500, TS700, TS750, and weSLICE 9500 were first
13 published?

14 MR. HORTON: Objection. Scope.

15 A. I do not, no.

16 BY MR. FELDHAKE:

17 Q. Do you know what is the difference
18 between a TS500 and a TS700?

19 MR. HORTON: Object to form.

20 A. I -- there may be other differences,
21 but I know the cutting blade is different between
22 the two machines for sure.

1 Q. What is the difference --

2 A. Slicing blade. I apologize.

3 Q. What is the difference in the
4 slicing blade between the TS500 and the TS700?

5 A. My understanding is the TS500's
6 blade is circular. Whereas the TS700 has a
7 noncircular -- I don't -- I forget the term
8 involute or something of that nature in terms of
9 its specific shape, designed for the cutting
10 process or slicing process.

11 Q. Do you know in which applications a
12 circular blade would be used instead of an
13 involute blade?

14 MR. HORTON: Objection. Scope.

15 A. That is not something that I've
16 attempted to memorialize or commit to my memory,
17 so I would have to review material to understand
18 the nuances between why one blade would be
19 preferential over another. Without reviewing
20 material, I don't think I can give you an answer
21 to that.

22 Q. Do you know what is the difference

1 between a TS700 and a TS750?

2 MR. HORTON: Object to form.

3 A. I am not certain exactly. I believe
4 there are size differences, but I don't know
5 specifically the differences between the two.

6 BY MR. FELDHAKE:

7 Q. Do you know what is the difference
8 between a TS750 and a weSLICE 9500?

9 MR. HORTON: Object to form.

10 A. Certainly I believe there are a
11 considerable number of differences. Those are
12 not differences that I was really anticipating
13 trying to give you at this time. But I know just
14 from reviewing the manuals today, very clearly
15 the [REDACTED] conveyor and the [REDACTED] conveyor
16 designs are significantly different.

17 The weSLICE 9500 actually has two
18 [REDACTED] conveyors; and the TS750 only has one.
19 I'm certain there would be a fair number of other
20 differences in the design. But that just is
21 pertaining to the [REDACTED] and [REDACTED]
22 conveyors.

1 Q. Do you have any opinion regarding
2 why customers purchase the TS500, TS700, TS750,
3 or weSLICE 9500?

4 MR. HORTON: Objection. Scope.

5 A. That is not anything that I am
6 really, I don't think, prepared to address today,
7 as far as why customers might be interested in
8 one machine versus another.

9 BY MR. FELDHAKE:

10 Q. So sitting here today, do you not
11 have an opinion why a customer might purchase the
12 TS500, TS700, TS750, or weSLICE 9500?

13 MR. HORTON: Objection. Scope.

14 Vague. Doesn't refer to which proceeding it
15 relates to.

16 A. I think that in the grand scheme of
17 things, certainly I have -- especially in the
18 litigation which I submitted my four different
19 reports, I have opinions regarding those four
20 machines. And there are issues regarding
21 differences between machines and why a customer
22 may want one over another. But that's really

1 nothing that I'm prepared to get into today and
2 give a cogent answer about.

3 Q. So sitting here today in connection
4 with this IPR, do you not have an opinion why a
5 customer might purchase the TS500, TS700, TS750,
6 or weSLICE 9500?

7 A. With respect to -- my work with
8 respect -- in the IPR is really essentially just
9 regurgitating this excerpt from one of my
10 reports. And that solely pertains to the four
11 machines basically practicing and being
12 commercial embodiments of the '487 patents. So
13 it hasn't pertained to any sort of analysis of
14 why a customer would want one machine over
15 another.

16 Q. Are you aware if the TS500, TS700,
17 TS750, or weSLICE 9500 practices any of the '487
18 patent claims besides claims 1 and 16?

19 MR. HORTON: Object to form.

20 A. In my report I only analyzed claims
21 1 and 16. And in this IPR proceeding, obviously
22 that excerpt only pertains to claims 1 and 16. I

1 don't believe I've performed an analysis on the
2 other claims.

3 So I don't know if I can give you an
4 answer as I sit here with respect to those other
5 claims.

6 Q. So sitting here today, is it true
7 that you do not have an opinion whether the
8 TS500, TS700, TS750, or weSLICE 9500 practices
9 any of the '487 patent claims besides claims 1
10 and 16?

11 A. I don't believe I've done that
12 analysis. So I don't know that I can give you an
13 opinion with respect to that. I, you know, if I
14 do the analysis, I might be able to perform -- to
15 give insights and form an opinion regarding that,
16 but as I sit here right now, I have only looked
17 at claims 1 and 16.

18 Q. Okay. So sitting here today you
19 have not done an analysis on any claims besides
20 claims 1 and 16; is that accurate?

21 A. I believe that's accurate.

22 Q. Are you aware that there is a motion

1 to amend in this IPR proceeding?

2 MR. HORTON: Objection. Scope.

3 A. I am sort of familiar with that, but
4 not being a patent attorney I don't fully
5 understand what that really means or what the
6 implications of that are. So I guess that's a
7 kind of a qualified yes.

8 BY MR. FELDHAKE:

9 Q. And can you tell me what your
10 understanding is in connection with the motion to
11 amend?

12 A. I believe there's some sort of
13 change with respect to claims being addressed or
14 asserted or being challenged. And beyond that, I
15 really am -- am not certain.

16 Q. Do you know if any of Textor's
17 products embody any of the proposed amended
18 claims?

19 MR. HORTON: Objection. Scope.

20 A. I'm not certain what the amended
21 claims are, so I don't know -- I can't give you
22 an answer to that.

1 BY MR. FELDHAKE:

2 Q. Okay. So sitting here today, you do
3 not have an opinion whether any of Textor's
4 products embody any of the proposed amended
5 claims; is that correct?

6 MR. HORTON: Objection. Asked and
7 answered.

8 A. I am -- I don't know how to answer
9 that other than what I already said. I just
10 don't know what the proposed amended claims are,
11 what they -- what that really means. I know in
12 terms of the analysis I've done, I believe the
13 machines embody the claim 1 and claim 16. And if
14 there's some change to that, then I can certainly
15 revisit my analysis and see if it still is
16 appropriate. But at this point, without knowing
17 what the amended claims might be, I don't know
18 how to answer fully.

19 Q. So as of today, you have not done an
20 analysis of any of the amended claims; is that
21 correct?

22 MR. HORTON: Objection. Asked and

1 answered.

2 A. I believe that's correct. I don't
3 really know.

4 BY MR. FELDHAKE:

5 Q. Okay. Can I get you to turn to
6 Paragraph 569 of Exhibit 2007. And let me know
7 when you're there.

8 (Whereupon, Exhibit 2007, Excerpt of
9 Claims, was marked for identification.)

10 A. I'm there.

11 BY MR. FELDHAKE:

12 Q. What is a "removable conveyor belt
13 unit" as used in this paragraph?

14 MR. FELDHAKE: Or I should -- hold
15 on. Let me strike that question.

16 BY MR. FELDHAKE:

17 Q. What is a "removable conveyor belt"
18 as used in this paragraph?

19 A. I think in terms of what it means in
20 the paragraph, we would look towards the -- that
21 claim element, claim 1[a], which basically
22 indicates that the conveyor belt unit has at

1 least one track and a base, and each of these
2 machines possess that, both a track and a base
3 for the conveyor belt unit, so they practice that
4 claim column.

5 Q. What is a track?

6 A. Sort of in layman's terms, it would
7 be the belt or belts of the conveyor.

8 Q. Do the conveyors shown on Page 321
9 of your report only include one track?

10 A. I would have to look at the weSLICE.
11 It's a little unclear. We could go to the
12 weSLICE manual to see if it's got multiple
13 tracks. I believe it may.

14 It appears at least in these images
15 that there's a single track for the TS500, 700
16 and 750. But, again, looking at the images in
17 the operating manual would probably be more
18 insightful.

19 Q. Were conveyor belts with tracks
20 known before the '487 patent?

21 MR. HORTON: Objection. Scope.

22 A. I don't -- I mean, conveyor belts,

1 certainly been around for a long time. So I
2 think it's fair to say they've probably been --
3 were known prior to this patent, yes.

4 BY MR. FELDHAKE:

5 Q. What is a "base" as used in
6 Paragraph 570 of your report?

7 A. I would say the physical structure
8 with -- that the track is mounted to or
9 mounted -- held by.

10 Q. Were conveyor belts with a base
11 known before the '487 patent?

12 MR. HORTON: Objection. Scope.

13 A. No, that's not really, I think, the
14 purpose of what I'm here to discuss today, but
15 I'm pretty sure that conveyor belts and tracks
16 and bases were known prior to the '487 patent.

17 BY MR. FELDHAKE:

18 Q. Could you please turn to Paragraph
19 572 of your report and let me know when you're
20 there.

21 A. Yes, I'm there.

22 Q. What is a substructure as used in

1 Paragraph 572 of your report?

2 A. It would be in terms of -- in terms
3 of this particular claim or claim element, it is
4 a -- a part of the structure of the machine that
5 couples the base to the machine, having a mount
6 which is basically something that the conveyor
7 couples with the machine when it is basically
8 connected to the machine.

9 Q. So is it your understanding that the
10 mount is part of the substructure?

11 A. Yes.

12 Q. Were conveyor belts with a
13 substructure known before the '487 patent?

14 MR. HORTON: Objection. Outside the
15 scope of his direct testimony.

16 A. I don't know if I've ever tried to
17 look at it and form an opinion with respect to
18 that previously, so it's not really what I was
19 here to discuss, and I don't really have a
20 specific opinion with respect to that.

21 BY MR. FELDHAKE:

22 Q. Before 2012 had you ever encountered

1 a conveyor belt with a substructure?

2 MR. HORTON: Objection. Scope.

3 A. I don't know that I ever analyzed a
4 conveyor prior to 2012 with respect to trying to
5 ascertain that. I don't -- I don't -- I don't
6 know that I can give you an answer with respect
7 to that.

8 BY MR. FELDHAKE:

9 Q. Had you ever analyzed a conveyor
10 belt before 2012?

11 MR. HORTON: Objection. Scope.

12 A. Sure. Yes.

13 BY MR. FELDHAKE:

14 Q. And can you explain to me what is a
15 mount in terms of Paragraph 572 of your report?

16 A. That would be -- the mount is the
17 part of the machine that the conveyor unit, for
18 example, the [REDACTED] conveyor or the [REDACTED]
19 conveyor basically connects to or couples with
20 the machine via.

21 Q. And what is the base as used in
22 Paragraph 573 of your report?

1 MR. HORTON: Objection. Asked and
2 answered.

3 A. It's the same element as the base
4 which is back -- referred to earlier the track
5 and the base of the conveyor belt unit.

6 BY MR. FELDHAKE:

7 Q. Can you please turn to Paragraph 578
8 of your report -- I'm sorry -- 575 and let me
9 know when you're there.

10 A. Okay.

11 Q. What is a "drive" as used in
12 Paragraph 576 [sic] of your report?

13 A. The drive is basically just the
14 component which moves when the -- when the
15 conveyor is in its operational state, it moves
16 the conveyor belt.

17 Q. Can you give me an example of a
18 drive as used in Paragraph 575 of your report?

19 A. Well, we've got the drive which is
20 coupled to the conveyor belt unit by the drive
21 belt. So the drive, which typically be a motor
22 of some sort, would -- is connected to a drive

1 belt. The drive belt is connected to the
2 conveyor unit.

3 And so would the drive -- the drive
4 moving when the conveyor is in operational state
5 will move the conveyor belt.

6 Q. And what is a drive belt, as used in
7 Paragraph 575 of your report?

8 A. Literally a belt that connects the
9 -- between the drive and the conveyor, which
10 causes the conveyor to move when the drive moves.

11 Q. Can you please turn -- now can you
12 please turn to Paragraph 578 of your report?

13 A. Sure.

14 Q. And let me know when you are there.

15 A. I am there.

16 Q. What does "is configured to be
17 cancelled by relaxing the drive belt" mean?

18 A. I think that essentially, in so many
19 words, what it means is that the conveyor belt
20 unit has a way of basically engaging and
21 disengaging the drive belt. When the drive belt
22 is cancelled, it would be in a relaxed state,

1 meaning basically there's no tension in the drive
2 belt and motion of the drive will not cause the
3 conveyor belt to move. And conversely when it's
4 tightened or tautened, then motion of the drive
5 will cause the conveyor belt unit to have motion.

6 Q. And what does the word "established"
7 mean in this section of your report?

8 A. I think it's really looking at the
9 -- you know, the prior phrase in the claim. It's
10 configured to be cancelled by relaxing the drive
11 belt and configured to be established by the
12 tautening the drive belt. So essentially the
13 connection between the drive and the conveyor
14 belt unit is either cancelled, meaning it's not
15 really there by relaxing the drive belt or it's
16 established meaning there is a connection when
17 the drive belt is tautened or tightened.

18 Q. And can you explain to me what it
19 means when it says: Each being provided by a
20 relative movement between the drive and the
21 conveyor belt unit?

22 A. Sure.

1 There is some sort of motion going
2 on which causes the tightening or loosening or
3 cancelling or tautening of the drive belt. And
4 in, for example, the TS500 and 700 and 750, it's
5 basically the rotation of a lever that cancels
6 that or relaxes the drive belt. Again, it's a
7 slightly different type mechanism on the weSLICE
8 9500.

9 Q. Can you explain the mechanism on the
10 weSLICE 9500?

11 A. Sure. I can try.

12 Essentially on the weSLICE 9500, a
13 lever has to be -- or first, a pin is pulled out
14 which basically unlocks a locking mechanism. A
15 lever is basically rotated to release the -- the
16 belt and the tautening or tightening of the belt.
17 So it's slightly different.

18 And then I think that essentially
19 removes the tension in the drive belt between the
20 drive and the conveyor belt unit.

21 Q. In the weSLICE 9500, is it the pin
22 or the lever that releases the tension from the

1 drive belt?

2 A. The pin just basically keeps the
3 lever in place and makes sure that that tension
4 which is there is maintained. And so moving the
5 pin out of its normal position would allow the
6 lever to move, which would allow the tension to
7 be released. So the lever is really what is
8 providing the tension in the belt, not the pin.

9 Q. So the term "cancelled" in this
10 section of your report means to de-tension the
11 belt; is that accurate?

12 A. For all extents and purposes, yeah,
13 I think it is. I mean, there may be -- if you
14 want to try and get into really a semantical
15 thing, there could be some tension in different
16 elements of the belt. But essentially moving
17 that lever causes the tension to be released
18 which allows the drive belt to be removed from
19 the conveyor belt unit. So it's essentially
20 removing the tension that's in the belt,
21 essentially relaxing the drive belt or cancelling
22 the drive belt's effect.

1 Q. Where would there be remaining
2 tension in the drive belt after cancelling the
3 drive belt?

4 A. Well, I mean, even a suspended drive
5 belt between two points is going to have some
6 tension just from its own mass. So it's just
7 kind of a theoretical point. But anything that
8 is suspended between two points is due to its own
9 mass going to have some tension.

10 Q. And would the tension on both sides
11 of the drive belt when being suspended be equal?

12 A. Not necessarily.

13 Q. Would the tension on both sides of
14 the drive belt be approximately equal?

15 A. I don't know that I could say that,
16 but I mean, the whole point of this is to be able
17 to remove the conveyor belt. And the whole point
18 of the lever is to remove the tension which
19 allows you to remove the drive belt. So that's
20 really the main -- the main thing.

21 Q. Okay. So I'm going to just go
22 through a similar line of questions, but this

1 time in connection with establishing instead of
2 cancelling.

3 So the term "established" in this
4 section of your report means to tension the belt;
5 is that accurate?

6 A. I think "established" I would read
7 as being making the connection a viable or
8 workable one. I mean, it indicates its
9 established by tautening the drive belt in the
10 claim. So moving the lever establishes the
11 connection between the drive and the conveyor
12 unit via the drive belt. And it does that
13 because there's basically tension or tightness
14 between the elements so there's -- when the drive
15 moves, the conveyor moves as well.

16 Q. Would the tension on both sides of
17 the drive belt be approximately equal when they
18 are established?

19 A. I haven't done an analysis on that,
20 so I don't know that I can give you a good
21 answer.

22 Q. Would you expect that the tension on

1 both sides of the drive belt would be
2 approximately equal when established?

3 A. I would expect they would be
4 similar. But, again, without doing an analysis,
5 I don't know that I can give you a good answer.
6 That's just kind of my best estimate, based on
7 just, you know, being a mechanical engineer and
8 understanding how things work.

9 Q. And looking at the figures, does
10 that also inform your opinion?

11 A. Sure.

12 Q. Would that tension be maintained
13 during the normal operation of any of these
14 slicers?

15 A. That is the idea, yes. The tension
16 is maintained which allows the drive to be
17 effective in moving the conveyor.

18 MR. FELDHAKE: We've been going for
19 a little over an hour, would you like to take
20 a break?

21 THE WITNESS: It's certainly up to
22 you. I'm fine if you want to keep going; or

1 if you want a break, we can take a break.

2 MR. FELDHAKE: Can we do five
3 minutes?

4 THE WITNESS: Sure.

5 MR. FELDHAKE: All right. We'll go
6 off the record.

7 THE COURT REPORTER: Off the record.

8 (Recess taken.)

9 THE COURT REPORTER: Back on the
10 record.

11 BY MR. FELDHAKE:

12 Q. Dr. Meyer, could you please turn to
13 Paragraph 580 of your report?

14 A. Okay.

15 Q. And I'm going to be referring to the
16 figures that are there. What is the [REDACTED]
17 lever in the TS500?

18 A. The [REDACTED] lever is -- my
19 understanding is, essentially, just that; the
20 lever which is rotated or turned in order to
21 establish or cancel the tension in the drive
22 belt.

1 Q. And what is the [REDACTED] lever in
2 the TS750?

3 A. The [REDACTED] lever in the 750 is
4 the same as the -- functionally the same as the
5 [REDACTED] lever in the TS500 or TS700. It's the
6 device which is rotated or pivoted essentially to
7 either cancel or establish the tension in the
8 drive belt.

9 Q. Did you ever encounter any levers
10 before 2012?

11 MR. HORTON: Objection. Scope.

12 A. In what context?

13 BY MR. FELDHAKE:

14 Q. A lever used to tension an object.

15 MR. HORTON: Same objection.

16 A. Sure. Yes.

17 BY MR. FELDHAKE:

18 Q. Did you ever encounter any levers
19 before 2012 that were used to lock on object in
20 place?

21 MR. HORTON: Objection. Scope.

22 A. I guess I am not certain. I mean,

1 I've changed a lot of alternator belts on cars
2 that I've owned. They have levers that tension
3 the belt between the alternator and the flywheel
4 of the vehicle, the engine. And that lever gets
5 locked in place in order to maintain that
6 tension.

7 So I guess I would say maybe not in
8 the exact fashion as done with these machines,
9 but certainly I've -- I've seen levers used to
10 lock components in place.

11 Q. Is it your understanding that there
12 is a --

13 MR. FELDHAKE: Strike that.

14 BY MR. FELDHAKE:

15 Q. Is it your understanding that there
16 is an object in the weSLICE 9500 that is similar
17 to the [REDACTED] lever or [REDACTED] lever?

18 A. I believe it's called the [REDACTED]
19 lever in the weSLICE 9500.

20 Q. Is that somewhere in your report?
21 Can you point that out to me, if it is?

22 A. The sections -- the paragraphs in my

1 report addressing that are just more general
2 about discussing the claim language and
3 cancelling or relaxing the drive belt and
4 tautening the drive belt. But it's pretty
5 explicitly identified in the operator's manual
6 for the weSLICE 9500.

7 Q. I'm just trying to find a visual in
8 your report. So is there any -- is there any
9 image in your report that shows the [REDACTED]
10 lever or [REDACTED] lever -- I can't remember
11 which one you called it.

12 I'm just trying to orient myself to
13 try to find a picture so we can discuss the same
14 thing and have a visual in front of us.

15 A. Well, honestly, I think the best
16 visual comes from the operator's manual. If --
17 if you'd like to look at the operator's manual
18 for the weSLICE 9500, I can give you a page
19 number or a figure number. And that's a really
20 clear depiction highlighted in a different color
21 of the [REDACTED] lever, which shows how the
22 [REDACTED] lever moves to basically tension or

1 de-tension the drive belt.

2 Q. Okay. So I don't want to turn to
3 the weSLICE 9500 manual.

4 So is there anything in your -- in
5 this report excerpt Exhibit 2007 or not?

6 MR. HORTON: Objection. Asked and
7 answered.

8 A. Can you repeat your question?

9 BY MR. FELDHAKE:

10 Q. Yes.

11 Can you point me to any figure in
12 Exhibit 2007 that shows the weSLICE 9500's
13 clamping lever?

14 A. I don't -- I don't know that there's
15 a good -- a good image that shows the [REDACTED]
16 lever in the [REDACTED] conveyor. There's basically
17 just an indication of the conveyor in a cancelled
18 and established conditions, and more or less
19 description of how its cancelled and established.

20 Again, though, the operator's manual
21 is very clear in terms of that.

22 Q. Can you please turn to Paragraph 583

1 of your report, and let me know when your there.

2 A. I am there.

3 Q. What does "is configured to be
4 removed and/or installed without tools" mean?

5 A. I believe it is -- it means that --
6 it's referring to the conveyor belt unit, and the
7 design of the conveyor belt unit is such that it
8 can be installed and/or removed without using
9 tools.

10 Q. Does "installed" mean that the
11 belt --

12 MR. FELDHAKE: Strike that.

13 BY MR. FELDHAKE:

14 Q. In context of claim 16, does
15 "installed" mean that the drive belt is
16 tensioned?

17 A. I think one would infer that that is
18 the case, yes. It's installed or removed,
19 meaning, it's taken from a position where it's
20 not on the machine to a position where it's in
21 the machine and in a configuration where it can
22 be utilized. Or it goes from a configuration

1 where it could be utilized to being removed from
2 the machine. And done so in a manner without
3 using tools.

4 Q. What do you mean by "a configuration
5 where it could be utilized"?

6 A. Essentially that there would be
7 tension in the drive belt, so that if the drive
8 moves, the conveyor belt would move. So a
9 functional state.

10 Q. Does that functional state require
11 that the conveyor belt could convey product, or
12 does it only require that the conveyor belt moves
13 if the belt moves?

14 A. I don't know that I'm understanding
15 that question.

16 Q. So you said that there would be
17 tension in the drive belt so that if the drive
18 moves, the conveyor belt would move, so a
19 functional state.

20 So I'm trying to understand what you
21 meant by that, by "the functional state."

22 Does "functional state" mean if the

1 drive moves, then the conveyor belt moves? Or
2 does functional state mean that the conveyor belt
3 unit is configured to convey product, food
4 product?

5 A. I'm not certain I know how to really
6 answer that. If we look at all the elements of
7 claim 1, it talks about the different components
8 of the removable conveyor belt unit, the track
9 and the base and how it's mounted to the machine
10 and how there is a drive that's connected to the
11 conveyor belt unit with a drive belt; and that
12 you can essentially cancel or establish that
13 connection by tautening or loosening the drive
14 belt.

15 And then further in claim 16, it is
16 basically just saying that that conveyor belt
17 unit is configured to be installed or removed
18 without tools. So it is basically reiterating
19 all of those elements in claim 1 are done without
20 using tools.

21 Q. Does the combination of claim 1 and
22 claim 16 require that the conveyor belt unit

1 could convey food product?

2 MR. HORTON: Object to form.

3 A. I don't think it specifically
4 addresses conveying food product, other than the
5 fact that -- claim 1 identifies the fact that
6 it's a slicing apparatus for food products, so
7 the implication would be that if -- if there is
8 this conveyor belt unit in the machine, that is a
9 slicer for food products, that food products
10 would be conveyed.

11 BY MR. FELDHAKE:

12 Q. Just to be clear, I want to
13 understand your opinion. Is it your opinion that
14 the combination of claim 1 and claim 16 require
15 that the conveyor belt unit could convey food
16 product?

17 MR. HORTON: Object to form. Asked
18 and answered.

19 A. I don't think that the claims
20 specifically talk about food product, other than
21 it addresses a slicing apparatus for food
22 products. So I don't know how to answer that any

1 other way than I already have.

2 BY MR. FELDHAKE:

3 Q. Turning back to Paragraph 53 of your
4 report, does Paragraph 53 of your report mean
5 that the conveyor belt unit could be held in
6 place with a tool-less latch?

7 MR. HORTON: Sorry, Mitch. What
8 paragraph was that?

9 MR. FELDHAKE: Sorry, I think I said
10 53. I meant 583. So I'll reask the question
11 just so the record is clear.

12 BY MR. FELDHAKE:

13 Q. Turning back to Paragraph 583 of
14 your report, does Paragraph 583 of your report
15 mean that the conveyor belt unit could be held in
16 place with a tool-less latch?

17 A. The claim indicates that it's to be
18 removed and installed without tools, so I
19 would -- I think a person of ordinary skill would
20 understand that to mean that it could be held in
21 place by a latch that did not require using a
22 tool to establish its effectiveness.

1 Q. Does Paragraph 583 of your report
2 mean that the conveyor belt unit could be held in
3 place by gravity and friction alone?

4 MR. HORTON: Object to form.

5 A. It does not say one way or another.

6 BY MR. FELDHAKE:

7 Q. Would a conveyor belt unit that is
8 held in place by gravity and friction alone meet
9 the claim requirements of claim 16?

10 MR. HORTON: Object to form.

11 A. There's an awful lot of details
12 there that are missing that makes it hard for me
13 to give you a positive answer on that. But
14 there's nothing in claim 16 that specifically
15 prohibits a conveyor belt unit being held in
16 place by friction and gravity.

17 BY MR. FELDHAKE:

18 Q. Can you please turn to Paragraph 587
19 of your report? And let me know when you're
20 there.

21 A. I am there.

22 Q. How do you know that the weSLICE

1 9500 [REDACTED] conveyor and [REDACTED] conveyor can
2 be removed without tools?

3 A. Well, the operating manual
4 specifically says that it can be done without
5 using tools and describes a technique where it
6 can be done without using tools.

7 Q. So I'm looking at the text of the
8 figures that span Pages 331 to 332 of your
9 report. If you could just read that text and
10 then let me know when you've done that, I think
11 it will make the questions a little easier to
12 understand.

13 A. Okay.

14 Q. Does the text that appears next to
15 the figures that span Page 331 through 332 of
16 your report indicate that the weSLICE 9500
17 conveyors can be removed by hand?

18 A. I would say what was attempted to be
19 shown here was that they could be removed by hand
20 and the figures that are here show the [REDACTED]
21 conveyor and the [REDACTED] conveyor and the
22 procedure which is -- part of the procedure which

1 is utilized in order to remove those conveyors.

2 And that procedure is one that's entirely

3 tool-free and can be done by hand.

4 So, for example, looking at the
5 figure on the bottom of Page 331, that's Figure
6 114 in the weSLICE 9500 manual, the previous
7 figure in there, Figure 113, talks about [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

13 All that is done in a tool-less
14 manner, which can be done by hand. The only
15 thing that's not really shown is actually lifting
16 the conveyor up off of the machine. And it's a
17 very similar sort of endeavor for the [REDACTED]
18 conveyor.

19 Q. Dr. Meyer, when you provided your
20 answer to my previous question, were you
21 reviewing the weSLICE 9500 manual?

22 A. I was looking at a figure in it,

1 yes.

2 Q. Were you looking at a figure that is
3 in your expert report, Exhibit 2007, or were you
4 looking at a separate document that is the
5 complete weSLICE 9500 manual?

6 A. I was looking at a page from the
7 manual that included that Figure 114, which is
8 from my report and Figure 113, which is not
9 contained in the report but which is in the
10 manual.

11 Q. So, Dr. Meyer, that weSLICE manual
12 is not actually an exhibit to this proceeding.
13 So I would request that you close that document
14 and you do not refer to it for the rest of this
15 deposition.

16 MR. FELDHAKE: And, Counsel, we will
17 reserve the right to move to strike
18 Dr. Meyer's former answer for reviewing to
19 documents that were not introduced in this
20 proceeding or this deposition.

21 MR. HORTON: And Patent Owner will
22 object to that. Those are documents that

1 were relied on in his report, discussed
2 extensively, cited in the report. So we can
3 reserve that discussion for a later date.

4 A. The page in question is specifically
5 identified in Paragraph 587, WEBER3-0090739 at
6 90879. That is -- that's what I was looking at,
7 that page.

8 BY MR. FELDHAKE:

9 Q. I understand. But, again, I request
10 that you do not refer to any documents that have
11 not been introduced as exhibits in this
12 proceeding for the rest of the deposition.

13 Have you reviewed any other
14 documents during this deposition today that are
15 not exhibits in this proceeding?

16 A. I don't know what exhibits are part
17 of the proceeding.

18 Q. Can you tell me what documents
19 you've reviewed during today's deposition?

20 A. I've looked at -- I've looked at
21 this manual for the weSLICE 9500. I may have
22 looked at the manuals for the other TS500 and 700

1 and 750 machines. I honestly don't recall.

2 Q. Do you recall if you looked at --

3 A. But I may have. I'm sorry.

4 Q. Are you done with your answer?

5 A. Yes.

6 Q. Do you recall if you looked at any
7 other documents besides the manuals in your
8 declaration excerpt?

9 A. I don't believe so.

10 Q. So back to what we were discussing
11 previously, referring to Pages 331 to 332 of the
12 excerpt of your expert report, is it your opinion
13 that the ability to remove a conveyor by hand
14 means that the conveyor can be removed without
15 tools?

16 A. I think that's the implication, yes.

17 Q. Do you have any experience in the
18 food processing industry, Dr. Meyer?

19 MR. HORTON: Object to form.

20 A. I think we've talked about that at
21 my previous depositions and covered that
22 essentially my experience with food processing

1 equipment.

2 BY MR. FELDHAKE:

3 Q. Can you summarize your experience
4 with food processing equipment today?

5 MR. HORTON: Same objection.

6 A. Sure.

7 I've been doing engineering
8 consulting for over 30 years. I have consulted
9 on a lot of different matters.

10 A number of them have involved
11 machines and processes with food and food-related
12 equipment. And so I've, at various times within
13 my career, looked at different kinds of machines
14 that have processed food and looked at their
15 designs and aspects related to the designs of
16 those machines.

17 Q. Have you ever personally designed
18 any food processing equipment?

19 A. I think as I probably indicated in
20 my prior deposition, my -- my consulting work in
21 my career has really been focused on analyzing
22 existing designs and not so much the synthesis of

1 new designs. So I'm not really a designer, but
2 analyst of existing designs.

3 Q. Approximately how long would you
4 estimate that you have spent working on projects
5 in the food processing industry?

6 A. I don't know that I can give you a
7 good answer to that.

8 Q. Can you estimate?

9 A. It's -- not really. I mean, it's
10 very hard. I don't know how to quantify that.
11 That would be very hard.

12 Q. Would you estimate that you've spent
13 more than three months throughout the course of
14 your career working on projects in the food
15 processing industry?

16 MR. HORTON: I think the witness
17 already established that he's not able to
18 quantify a specific number here.

19 MR. FELDHAKE: Counsel, throughout
20 this deposition, you've repeatedly made
21 speaking objections that are in contradiction
22 to the trial practice guide. I ask that you

1 stop.

2 MR. HORTON: Noted.

3 BY MR. FELDHAKE:

4 Q. Would you like me to reask the
5 question, Dr. Meyer?

6 A. No.

7 Q. Okay.

8 A. I really don't know how to -- I
9 don't feel comfortable trying to come up with a
10 number in terms of time as far as that goes.

11 Q. Would you estimate that you've spent
12 more than a year throughout the course of your
13 career on projects working on projects in the
14 food processing industry?

15 MR. HORTON: Object to form.

16 A. Again, I don't know that I can
17 quantify it.

18 BY MR. FELDHAKE:

19 Q. Why do you not know if you can
20 quantify it?

21 MR. HORTON: Object to form.

22 A. I think you're asking a really

1 difficult question. I've worked on a whole
2 variety of projects. Those projects are -- many
3 of them occur in the course of my work along with
4 other projects that I'm working on, and so to
5 parse out what portion should be ascribed to a
6 particular case versus another one is just
7 something that I'm not prepared to do. That's
8 not something that I've ever tried to quantify.

9 Q. So you said that you couldn't
10 identify which portion should be ascribed to a
11 particular case versus another. Did you mean
12 legal case or what did you mean by the term
13 "case"?

14 A. A project that I'm working on.

15 Q. So sitting here today, are you
16 unable to estimate how many months you have spent
17 throughout the course of your career on projects
18 working --

19 MR. FELDHAKE: Strike that. I got
20 tongue twisted. I'll start again.

21 BY MR. FELDHAKE:

22 Q. So sitting here today, are you

1 unable to estimate how many months you have spent
2 throughout the course of your career working on
3 projects in the food processing industry?

4 MR. HORTON: Object to form.

5 A. I'm unable to come up with a figure
6 for you.

7 MR. FELDHAKE: Okay. I think this
8 is everything, but I'm going to take five
9 minutes to go over my notes. So if we could
10 go off the record.

11 THE COURT REPORTER: Off the record.
12 (Recess taken.)

13 MR. FELDHAKE: All right. We can go
14 back on the record.

15 BY MR. FELDHAKE:

16 Q. Dr. Meyer, did you have any
17 discussions during any of the breaks today with
18 your counsel?

19 A. No.

20 MR. FELDHAKE: Okay. I have no
21 further questions. Thank you for your time
22 today, Dr. Meyer.

1 THE WITNESS: Thank you very much.

2 MR. HORTON: No questions from my
3 end. Thank you.

4 THE COURT REPORTER: Mr. Horton, can
5 I get your order for the record, please?

6 MR. HORTON: Yeah, do we have a
7 standing order going on right now? I think
8 it's same-day rough.

9 Is that the party agreement on that?

10 MR. FELDHAKE: I don't think you
11 guys have put in a standing in the IPR.
12 Just -- I don't believe that you have, but
13 you might have.

14 MR. HORTON: Yeah. I think same-day
15 rough would be great.

16 THE COURT REPORTER: When do you
17 want the final?

18 MR. HORTON: Expedited, given the
19 deadlines, please.

20 THE COURT REPORTER: Okay.

21 (Time noted: 4:04 p.m. EDT.)

22

1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2 I, Amanda Gorrono, the officer
3 before whom the foregoing deposition was
4 taken, do hereby certify that the foregoing
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7 reduced to typewriting under my direction;
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8 to, nor employed by any of the parties to
9 this case and have no interest, financial or
10 otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto
11 set my hand this 18th day of September, 2024.

12

13

14

15

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Case: Provisur Technologies, Inc. v. Textor Maschinenbau, GmbH

4 Date of deposition: September 18, 2024

Deponent: John Meyer, Ph.D.

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12

13

14

15

16

17

18

19

20

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22

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A ability 63:13 able 6:5 32:14 45:16 65:17 absent 71:21 Absolutely 26:10 accomplish 27:2 accurate 32:20 32:21 44:11 46:5 acknowledge 72:6 actual 17:6 address 5:7,9 15:19 30:6 addressed 9:8 33:13 addresses 15:22 56:4,21 addressing 51:1 adds 21:3,5 advancement 17:7 advise 71:10 advised 71:6 afternoon 5:22 agreement 69:9 allow 44:5,6 allowed 71:13 allowing 60:9 allows 44:18 45:19 47:16 60:11 alternator 50:1,3 Amanda 1:17 2:6 70:2,16 amend 33:1,11 amended 33:17 33:20 34:4,10 34:17,20 analysis 10:5 19:1,4,9,22 23:7 31:13 32:1 32:12,14,19 34:12,15,20 46:19 47:4	analyst 65:2 analyze 19:7,11 19:14 20:8 22:13 analyzed 19:22 22:17 23:4,12 31:20 39:3,9 analyzing 19:17 64:21 AND- 3:9 and/or 53:4,8 71:9 answer 10:16 11:5 23:18 24:6 24:8 26:17 28:20 31:2 32:4 33:22 34:8,18 39:6 46:21 47:5 55:6 56:22 58:13 60:20 61:18 63:4 65:7 answered 34:7 35:1 40:2 52:7 56:18 answers 7:10 10:17 72:10,13 anticipating 14:12 26:15 29:12 apologize 28:2 apparatus 56:6 56:21 APPEAL 1:3 appear 22:15 appears 36:14 59:14 applicable 71:13 applications 28:11 appropriate 34:16 72:9 approximately 11:3 12:8,15 13:20 45:14 46:17 47:2 65:3 ascertain 39:5 ascribed 67:5,10	asked 7:16 19:10 19:13 24:9 34:6 34:22 40:1 52:6 56:17 asking 10:15 66:22 aspects 64:15 asserted 20:12 33:14 assumed 14:22 assumptions 15:4 attached 72:11 attempted 28:16 59:18 attorney 16:7 33:4 attorneys 13:17 13:21 aware 14:14,18 14:22 31:16 32:22 awful 58:11 B B 4:6 B2 1:11 Babbitt 3:10 5:17 back 9:20 40:4 48:9 57:3,13 63:10 68:14 bar 60:8 base 36:1,2 37:5 37:10 38:5 39:21 40:3,5 55:9 based 47:6 bases 37:16 basically 8:9 27:2 27:9 31:11 35:21 38:6,7 39:19 40:13 41:20 42:1 43:5 43:14,15 44:2 46:13 51:22 52:16 55:16,18 basics 10:13 behalf 3:3,15	5:13,19 belabor 10:12 believe 6:7,10,11 9:2,6,8 10:6 14:4,17 16:20 17:3,4,20 18:4 18:18 20:10 23:17 29:3,10 32:1,11,21 33:12 34:12 35:2 36:13 50:18 53:5 63:9 69:12 belt 24:19 25:1 25:15 35:12,17 35:22 36:3,7 39:1,10 40:5,16 40:20,21 41:1,1 41:5,6,8,17,19 41:21,21 42:2,3 42:5,11,12,14 42:15,17,21 43:3,6,16,16,19 43:20 44:1,8,11 44:16,18,19,20 44:21 45:2,3,5 45:11,14,17,19 46:4,9,12,17 47:1 48:22 49:8 50:3 51:3,4 52:1 53:6,7,11 53:15 54:7,8,11 54:12,13,17,18 55:1,2,8,11,11 55:14,16,22 56:8,15 57:5,15 58:2,7,15 60:11 60:12 belt's 44:22 belts 11:17 36:7 36:19,22 37:10 37:15 38:12 50:1 best 47:6 51:15 beyond 33:14 blade 27:21 28:2 28:4,6,12,13,18	BOARD 1:3 bottom 60:5 Boulevard 3:17 71:2 box 72:9 break 11:2,6 25:19 47:20 48:1,1 breaks 11:3 68:17 breakthrough 17:7 briefly 23:3 briefs 9:16 13:10 broke 20:1 C C 3:1 c/o 71:1 call 71:15 called 5:1 50:18 51:11 Calls 16:4 17:14 cancel 48:21 49:7 55:12 cancelled 41:17 41:22 42:10,14 44:9 52:17,19 cancelling 43:3 44:21 45:2 46:2 51:3 cancels 43:5 career 64:13,21 65:14 66:13 67:17 68:2 cars 50:1 case 1:10 53:18 67:6,11,12,13 70:9 71:3 72:4 73:8 cause 42:2,5 causes 41:10 43:2 44:17 certain 8:7 29:3 29:19 33:15,20 49:22 55:5 certainly 16:7
---	--	---	--	---

20:17,22 21:1 25:4 29:10 30:17 34:14 37:1 47:21 50:9 CERTIFICATE 70:1 Certified 2:7 certify 70:4 challenged 33:14 change 33:13 34:14 73:11 changed 50:1 changes 72:11 charged 16:8 Charles 5:10 Check 72:9 Chicago 3:7,12 circular 28:6,12 cited 62:2 claim 16:12 20:1 20:2,2,5,6,6,7 20:15,15,21,21 20:22 21:3,4,5 21:8,12 34:13 34:13 35:21,21 36:4 38:3,3 42:9 46:10 51:2 53:14 55:7,15 55:19,21,22 56:5,14,14 57:17 58:9,9,14 claims 16:12 20:1 20:9,11 24:20 25:2 26:8 31:18 31:18,20,22 32:2,5,9,9,17 32:19,20 33:13 33:18,21 34:5 34:10,17,20 35:9 56:19 clamping 48:16 48:18 49:5 50:17,18 51:9 51:21,22 52:13 52:15 clarification 7:11 clarify 7:10 10:21	clear 7:12 51:20 52:21 56:12 57:11 clearly 29:14 close 61:13 CLR 1:17,18 70:16,17 cogent 31:2 College 3:17 71:2 color 51:20 column 36:4 combination 55:21 56:14 come 66:9 68:5 71:7 comes 51:16 comfortable 17:17 66:9 commercial 9:7 15:20 16:2 17:22 18:12 31:12 Commission 70:21 commit 28:16 company 8:14 compared 20:2 complete 61:5 71:6 72:10,12 complicated 26:18 component 40:14 components 50:10 55:7 concept 17:19 concerning 26:17 conclusion 16:5 17:15 conditions 52:18 configuration 53:21,22 54:4 configured 21:7 41:16 42:10,11 53:3 55:3,17 connected 38:8 40:22 41:1 55:10	connection 8:4 8:21 31:3 33:10 42:13,16 46:1,7 46:11 55:13 connects 39:19 41:8 consent 71:22 considerable 29:11 considerations 16:15 consulted 64:8 consulting 64:8 64:20 contain 16:8 contained 10:5 14:7 17:5 61:9 contains 19:21 contents 14:2 context 16:2 49:12 53:14 contradiction 65:21 control 12:22 29:15,18,21 39:18 52:16 59:1,20 60:10 conversely 42:3 convey 54:11 55:3 56:1,15 conveyed 56:10 conveying 56:4 conveyor 11:17 12:22 21:6,9 24:15,19,22 25:15 29:15,15 35:12,17,22 36:3,7,19,22 37:10,15 38:6 38:12 39:1,4,9 39:17,18,19 40:5,15,16,20 41:2,4,5,9,10 41:19 42:3,5,13 42:21 43:20 44:19 45:17 46:11,15 47:17	52:16,17 53:6,7 54:8,11,12,18 55:1,2,8,11,16 55:22 56:8,15 57:5,15 58:2,7 58:15 59:1,1,21 59:21 60:10,16 60:18 63:13,14 conveyors 11:18 11:20 12:2 25:5 25:9,12 27:8,10 29:18,22 36:8 59:17 60:1 copy 71:8 copying 18:6 71:21 Copyright 71:20 correct 7:4 10:17 21:20,22 22:18 27:6 34:5,21 35:2 70:5 72:9 72:12 counsel 10:15 61:16 65:19 68:18 70:7 71:9 71:12 County 70:20 couple 12:13 coupled 40:20 couples 38:5,7 39:19 course 65:13 66:12 67:3,17 68:2 court 5:6,11 7:18 8:5,19,22 9:13 9:16 14:7,15 15:16 48:7,9 68:11 69:4,16 69:20 court's 9:21 covered 63:21 customer 30:11 30:21 31:5,14 customers 30:2,7 cut 12:6 cutting 27:21	28:9 D D 4:1 D.C 1:21 72:2 73:3 date 62:3 71:4 72:5,17,22 73:10,22 day 70:11 de-tension 44:10 52:1 de-tensions 60:11 deadlines 69:19 dealing 21:2 decide 20:8 declarants 15:6 declaration 6:12 6:18 11:13 12:9 12:12 63:8 declarations 13:14 14:19 15:1 dense 26:4 depending 14:10 depends 21:4 depiction 51:20 deponent 71:4,7 71:9 depos 11:19 deposed 9:20 10:7 deposition 1:13 2:4 11:11 12:6 61:15,20 62:12 62:14,19 64:20 65:20 70:3 71:4 71:12 72:5,7 73:10 depositions 11:20 12:1 63:21 describe 8:3 11:10 26:11 described 24:20 25:2 26:8 describes 59:5 description 4:7
--	---	---	--	--

52:19 design 25:4,8 26:22 29:20 53:7 designed 28:9 64:17 designer 65:1 designs 29:16 64:15,15,22 65:1,2 details 14:22 21:1 58:11 determine 15:15 22:14 device 49:6 diagrams 13:3 dictated 25:6 difference 20:15 20:18,20 27:17 28:1,3,22 29:7 differences 27:20 29:4,5,11,12,20 30:21 different 26:21 27:21 29:16 30:18 43:7,17 44:15 51:20 55:7 64:9,13 difficult 67:1 Digital 1:20 71:19,20 72:1 73:1 direct 38:15 direction 70:7 discuss 14:13 26:15 37:14 38:19 51:13 discussed 23:3 62:1 discussing 51:2 63:10 discussion 62:3 discussions 68:17 disengaging 41:21 district 7:18 8:5 8:19,21 9:13,16	9:21 14:7,15 15:16 document 61:4 61:13 documents 9:22 10:3 61:19,22 62:10,14,18 63:7 doing 47:4 64:7 Dr 3:6,11 6:1 10:8 48:12 60:19 61:11,18 63:18 66:5 68:16,22 drastically 12:7 draw 8:18 drive 40:11,13,18 40:19,20,21,22 41:1,3,3,6,9,10 41:17,21,21 42:1,2,4,10,12 42:13,15,17,20 43:3,6,19,20 44:1,18,21,22 45:2,3,4,11,14 45:19 46:9,11 46:12,14,17 47:1,16 48:21 49:8 51:3,4 52:1 53:15 54:7 54:7,17,17 55:1 55:10,11,13 60:11,12 due 6:12 45:8 duly 5:2 E E 3:1,1 4:1,6 E-MAIL 3:8,13 3:19 earlier 11:20 40:4 easier 59:11 Edgar 5:9 Edison 6:3 EDT 1:15 2:2 69:21 effect 44:22	effective 47:17 effectiveness 57:22 efficient 25:20 either 42:14 49:7 electronically 71:21 element 20:2,3,5 35:21 38:3 40:3 elements 20:6 21:5 44:16 46:14 55:6,19 embodied 19:18 embodies 22:18 23:15 24:1 embodiments 9:7 15:20 16:2,11 31:12 embody 18:17,19 18:21 33:17 34:4,13 employed 70:8 encompass 25:16 encounter 49:9 49:18 encountered 38:22 end-client 8:15 endeavor 60:17 engaging 41:20 engine 50:4 engineer 47:7 engineering 64:7 entails 16:21 entire 25:13 entirely 60:2 entirety 12:5 27:7 equal 45:11,14 46:17 47:2 equipment 64:1,4 64:12,18 erise 3:16 5:19 71:1 errata 71:11 72:11 73:6 especially 30:17	Esquire 3:4,10,16 essentially 17:19 23:11 31:8 41:18 42:12 43:12,18 44:16 44:19,21 48:19 49:6 54:6 55:12 63:22 establish 48:21 49:7 55:12 57:22 established 42:6 42:11,16 46:3,6 46:9,18 47:2 52:18,19 65:17 establishes 46:10 establishing 46:1 estimate 47:6 65:4,8,12 66:11 67:16 68:1 Evidence 1:20 71:19,20 72:1 73:1 exact 10:9 50:8 exactly 17:18 29:3 EXAMINATI... 4:2 5:20 examine 13:3 examined 5:3 72:7 example 8:12 12:21 17:21,22 39:18 40:17 43:4 60:4 excerpt 4:9 6:19 9:11,12 11:14 14:15 15:11,19 31:9,22 35:8 52:5 63:8,12 excerpts 15:15 18:15 exhibit 4:7,8 6:13 9:12 10:5 12:16 14:2,8 15:10,11 17:9 18:3,6,9 18:12,16 19:21	22:15 24:12 35:6,8 52:5,12 61:3,12 exhibits 62:11,15 62:16 existing 64:22 65:2 expect 46:22 47:3 Expedited 69:18 experience 63:17 63:22 64:3 expert 13:13 14:19 61:3 63:12 Expires 70:22 explain 19:16 39:14 42:18 43:9 explicitly 51:5 express 71:22 extensively 62:2 extent 8:11 extents 44:12 F facets 26:22 fact 9:6 15:19 56:5,5 fair 29:19 37:2 familiar 21:17,20 21:21 33:3 far 12:4 23:21 30:7 66:10 Farr 3:5,11 5:15 fashion 50:8 features 24:19 25:1,5,9 26:7 26:12 feel 7:9 66:9 Feldhake 3:4 4:3 5:12,13,21 15:14 16:13,22 18:1 19:6 20:19 21:14 23:22 24:7 27:16 29:6 30:9 33:8 34:1 35:4,11,14,16
--	---	---	--	--

37:4,17 38:21 39:8,13 40:6 47:18 48:2,5,11 49:13,17 50:13 50:14 52:9 53:12,13 56:11 57:2,9,12 58:6 58:17 61:16 62:8 64:2 65:19 66:3,18 67:19 67:21 68:7,13 68:15,20 69:10 figure 51:19 52:11 60:5,5,7 60:7,22 61:2,7 61:8 68:5 figures 13:4 47:9 48:16 59:8,15 59:20 final 69:17 financial 70:9 find 51:7,13 fine 47:22 firm 5:15 first 5:2 27:12 43:13 five 48:2 68:8 Flex 21:15,17,20 flywheel 50:3 focus 15:10 focused 64:21 follows 5:4 food 26:18,19 55:3 56:1,4,6,9 56:9,15,20,21 63:18,22 64:4 64:11,14,18 65:5,14 66:14 68:3 food-related 64:11 forbidden 71:21 foregoing 70:3,4 72:7 forget 28:7 form 18:22 20:16 21:11 27:19	29:2,9 31:19 32:15 38:17 56:2,17 58:4,10 63:19 66:15,21 68:4 former 61:18 forward 71:11 four 13:7 18:18 20:3,5 22:22 30:18,19 31:10 friction 58:3,8,16 front 51:14 full 6:2,5 fully 33:4 34:18 function 25:4,9 functional 54:9 54:10,19,21,22 55:2 functionally 49:4 further 55:15 68:21 G G 3:10 Gallagher 3:5,11 5:15 general 51:1 generally 16:20 18:16 give 24:6 25:21 26:16 28:20 29:13 31:2 32:3 32:12,15 33:21 39:6 40:17 46:20 47:5 51:18 58:13 65:6 given 69:18 70:6 72:10,13 GmbH 1:8 7:3 71:3 72:4 73:8 go 10:13 11:6 19:21 36:11 45:21 48:5 68:9 68:10,13 goes 53:22 66:10 going 9:5 15:9	26:16 43:1 45:5 45:9,21 47:18 47:22 48:15 68:8 69:7 good 5:22 10:22 14:21 26:17 46:20 47:5 52:15,15 65:7 Gorrone 1:17 2:6 70:2,16 governing 71:13 grand 30:16 gravity 58:3,8,16 great 11:9 69:15 Group 1:20 71:19,20 72:1 73:1 guess 8:7,14,15 8:17,19 13:6 14:10,21 16:6 33:6 49:22 50:7 guide 65:22 guys 69:11 H H 4:6 hand 59:17,19 60:3,14 63:13 70:11 happy 7:12 hard 13:1 58:12 65:10,11 harder 12:18 held 2:5 37:9 57:5,15,20 58:2 58:8,15 help 7:14 hereunto 70:10 hesitate 71:15 high 26:20 highlighted 51:20 history 7:6 hold 35:14 honestly 51:15 63:1 Horton 3:16 5:18 5:18 16:4,16	17:14 18:22 20:16 21:11 23:16 24:3 27:14,19 28:14 29:2,9 30:4,13 31:19 33:2,19 34:6,22 36:21 37:12 38:14 39:2,11 40:1 49:11,15,21 52:6 56:2,17 57:7 58:4,10 61:21 63:19 64:5 65:16 66:2 66:15,21 68:4 69:2,4,6,14,18 hour 11:3 13:22 47:19 hours 12:6 13:5,7 Hunter 3:16 5:18 Hunter.horton... 3:19 I idea 47:15 identification 15:13 35:9 identified 51:5 62:5 identifies 56:5 identify 67:10 IL 3:7,12 Illinois 5:10 image 51:9 52:15 images 36:14,16 implication 56:7 63:16 implications 33:6 include 24:16,19 25:1 26:7 36:9 included 61:7 including 71:21 indicate 21:9 59:16 indicated 64:19 indicates 21:6 35:22 46:8	57:17 indication 52:17 indications 17:3 indicia 16:17 17:2,10 industry 63:18 65:5,15 66:14 68:3 infer 53:17 inform 10:4 47:10 infringement 9:3 9:12 initial 7:21 9:19 insightful 36:18 insights 32:15 installed 53:4,8 53:10,15,18 55:17 57:18 instructs 10:16 interest 70:9 interested 30:7 introduced 61:19 62:11 invention 16:18 17:4,5,21 involute 28:8,13 involved 7:7 64:10 involvement 8:20 involving 7:18 8:5 IP 3:16 5:19 71:1 IPR 6:13 7:2 10:2 13:10,15 14:16 31:4,8,21 33:1 69:11 IPR2024-00224 1:10 6:15 14:3 issues 30:20 J John 1:13 2:4 4:3 4:9 5:1,8 6:3 15:12 71:1,4 72:5 73:9 July 9:20 14:17
--	--	--	---	--

June 9:20	lead 17:4	63:2,6 64:13,14	63:7	Meyer 1:13 2:4
K	Lee 5:9	looking 11:19	marked 15:12	4:3,9 5:1,8 6:1
keep 47:22	legal 9:22 16:5	36:16 42:8 47:9	35:9	6:3 10:8 15:12
keeps 44:2	17:15,19 67:12	59:7 60:4,22	Maschinenbau	48:12 60:19
kind 15:3 33:7	legally 16:9	61:2,4,6 62:6	1:8 7:3 71:3	61:11 63:18
45:7 47:6	Let's 7:16	loosening 43:2	72:4 73:8	66:5 68:16,22
kinds 64:13	lever 43:5,13,15	55:13	mass 45:6,9	71:1,4 72:5
know 6:8,10 7:12	43:22 44:3,6,7	lot 50:1 58:11	Masters 5:9	73:9
10:20 11:4 13:5	44:17 45:18	64:9	material 24:4	Meyer's 61:18
15:2,2,5 16:14	46:10 48:17,18	lots 26:21	28:17,20	Mfeldhake@wi...
16:20 17:6,12	48:20 49:1,3,5	M	materials 9:15	3:8
17:16,19 18:20	49:14 50:4,17	M 1:21 72:1 73:2	matter 71:6	Michael 3:10
21:15 23:1,5,9	50:17,19 51:10	machine 17:22	matters 14:13	Mike 5:16
23:14,18 24:1	51:10,21,22	20:3 21:3 23:6	64:9	minutes 12:11
27:11,17,21	52:13,16	25:19 30:8	Mbabbitt@wil...	48:3 68:9
28:11,22 29:4,7	levers 49:9,18	31:14 38:4,5,7	3:13	missing 58:12
29:13 32:3,12	50:2,9	38:8 39:17,20	mean 12:12	Mitch 5:12 57:7
32:13 33:16,21	lifting 60:15	53:20,21 54:2	25:10 26:13	Mitchell 3:4
34:8,10,11,17	limited 6:18	55:9 56:8 60:16	36:22 41:17	moment 25:21
35:3,6 37:19	line 8:18 45:22	machine's 26:22	42:7 44:13 45:4	months 65:13
38:16 39:3,6	73:11	machines 8:12,13	45:16 46:8	67:16 68:1
40:9 41:14 42:9	link 17:20	9:4,6,7 15:20	49:22 53:4,10	motion 32:22
45:15 46:20	Literally 41:8	16:11 19:2,13	53:15 54:4,22	33:10 42:2,4,5
47:5,7 52:14	litigation 7:6 8:5	20:4,4,6,12	55:2 57:4,15,20	43:1
53:1 54:14 55:5	30:18	22:21,22 23:5	58:2 65:9 67:11	motions 9:16
56:22 58:19,22	little 12:18 13:1,2	23:12 25:13,16	67:12	motor 40:21
59:10 62:16	26:3 36:11	26:18 27:9,10	meaning 16:9	mount 38:5,10
65:6,10 66:8,16	47:19 59:11	27:22 30:20,21	42:1,14,16	39:15,16
66:19	Live 2:7	31:11 34:13	53:19	mounted 37:8,9
knowing 34:16	LLC 73:1	36:2 50:8 63:1	means 16:10 33:5	55:9
knowledge 17:11	LLP 3:5,11	64:11,13,16	34:11 35:19	move 41:5,10
known 36:20	lock 49:19 50:10	main 45:20,20	41:19 42:19	42:3 44:6 54:8
37:3,11,16	locked 50:5	maintain 50:5	44:10 46:4 53:5	54:18 61:17
38:13	locking 43:14	maintained 44:4	63:14	movement 42:20
KS 3:18 71:2	60:8,8,9	47:12,16	meant 54:21	moves 40:14,15
L	logistics 10:12	making 15:3 46:7	57:10	41:10 46:15,15
L.L.C 72:1	long 12:8,11,13	manner 26:20,21	mechanical 47:7	51:22 54:8,12
Lane 5:9	13:20 37:1 65:3	54:2 60:14	mechanism 43:7	54:13,18 55:1,1
language 51:2	long-felt 18:9	manual 36:12,17	43:9,14	moving 41:4 44:4
LaSalle 3:6,11	longer 20:22	51:5,16,17 52:3	meet 58:8	44:16 46:10
latch 57:6,16,21	look 19:13,20	52:20 59:3 60:6	memorialize	47:17
60:9	35:20 36:10	60:21 61:5,7,10	28:16	multiple 36:12
law 5:14 16:3,15	38:17 51:17	61:11 62:21	memory 12:3	N
17:2,13	55:6	manuals 11:15	17:18 23:20	N 3:1 4:1
layman's 36:6	looked 9:3 11:14	12:21 27:4,11	28:16	name 5:7,12 6:2
	12:20 32:16	29:14 62:22	mention 21:12	15:5 72:5 73:9
	62:20,20,22		met 20:4,6	

nature 28:8	52:6 64:5	71:2	23:2,10,13	please 6:1 10:20
necessarily 14:12	objections 65:21	owned 50:2	24:20 25:2,6	11:4,10 24:11
45:12	obviously 12:19	Owner 1:9 5:19	26:9 27:3 31:18	24:21 37:18
need 7:9 11:3	31:21	61:21	32:9 33:4 36:20	40:7 41:11,12
18:9 26:1	occur 67:3		37:3,11,16	48:12 52:22
neither 70:7	offhand 21:17	P	38:13 61:21	58:18 69:5,19
new 2:8 5:3 65:1	office 1:1 71:7,15	P 3:1,1	patents 23:15,21	71:6,10,11,14
70:19	officer 70:2	p.m 1:15 2:2	24:2 31:12	point 34:16 45:7
nexus 17:12 18:3	okay 6:20 7:13	69:21	pending 11:5	45:16,17 50:21
noncircular 28:7	8:16 10:11 11:7	page 4:2,7 12:12	perform 7:17	52:11
normal 44:5	13:9 14:1 15:9	36:8 51:18	23:7 32:14	points 12:14 45:5
47:13	24:18 25:17	59:15 60:5 61:6	performed 7:20	45:8
North 3:6,11	26:5,6 32:18	62:4,7 71:12	32:1	portion 67:5,10
Notary 2:7 5:2	34:2 35:5 40:10	72:4 73:11	period 71:13	portioning 29:15
70:18 72:22	45:21 48:14	pages 59:8 63:11	person 22:2,3,5,6	29:21 39:18
Note 2:7	52:2 59:13 66:7	72:7	22:8,11 57:19	59:1,21 60:17
noted 66:2 69:21	68:7,20 69:20	paragraph 24:11	personally 64:17	portions 14:6
72:11	opening 60:8	35:6,13,18,20	pertain 8:13	position 44:5
notes 68:9	operating 36:17	37:6,18 38:1	pertained 31:13	53:19,20 60:9
noticing 71:12	59:3	39:15,22 40:7	pertaining 10:1	positive 58:13
noting 71:12	operation 47:13	40:12,18 41:7	12:21 29:21	possess 36:2
novel 17:6	operational	41:12 48:13	pertains 8:11	possibly 19:3
nuances 28:18	40:15 41:4	52:22 57:3,4,8	17:20 31:10,22	26:13
number 12:19	operator's 51:5	57:13,14 58:1	pertinent 11:17	practice 19:2
29:11,19 51:19	51:16,17 52:20	58:18 62:5	20:10	23:2,10 36:3
51:19 64:10	operators' 11:15	paragraphs	Petitioner 1:6 3:3	65:22
65:18 66:10	12:21	50:22	5:13	practiced 20:11
NW 1:21 72:1	opinion 30:1,11	parent 8:14	Ph.D 1:13 2:5 4:3	22:14
73:2	31:4 32:7,13,15	Park 3:18 71:2	4:9 5:1 15:12	practices 31:17
	34:3 38:17,20	parse 67:5	71:1,4 72:5	32:8
O	47:10 56:13,13	part 14:11 19:9	73:9	practicing 19:15
object 20:16	63:12	38:4,10 39:17	PHONE 3:8,12	22:20,21 31:11
21:11 27:19	opinions 17:8	59:22 62:16	3:18	preface 16:6
29:2,9 31:19	18:2,5,8,11	particular 10:2	photograph 13:4	preferential
49:14,19 50:16	30:19	38:3 67:6,11	phrase 25:22	28:19
56:2,17 58:4,10	option 71:9,10	particularly 9:4	42:9	preparation
61:22 63:19	order 13:22	parties 7:7 70:8	physical 16:11	12:16 27:6
66:15,21 68:4	48:20 50:5 60:1	party 69:9	37:7	prepare 11:11
objection 16:4,16	69:5,7	patent 1:1,3,9,11	picture 51:13	prepared 14:1,5
17:14 18:22	orders 9:17	5:19 6:16,21	pictures 13:4	14:9,13 16:19
23:16 24:3	ordinary 57:19	7:19 8:6,22 9:2	pin 43:13,21 44:2	23:18 24:5 30:6
27:14 28:14	orient 51:12	9:3,8,9 15:21	44:5,8 60:8,9	31:1 67:7
30:4,13 33:2,19	original 6:19	16:3,7,12,15	pivoted 49:6	preparing 9:19
34:6,22 36:21	71:11	17:2,5,12,21	pivoting 60:10	12:10 13:18
37:12 38:14	outcome 70:10	18:17,19,21	place 44:3 49:20	pretty 37:15 51:4
39:2,11 40:1	Outside 38:14	19:2,15,18	50:5,10 57:6,16	previous 12:1
49:11,15,21	Overland 3:18	22:15,18,19,21	57:21 58:3,8,16	60:6,20 63:21

previously 10:4 23:4 38:18 63:11	17:8 18:2,5,8 18:11	46:6 59:9 72:6	reiterating 55:18	31:20 36:9 37:6
prior 37:3,16 39:4 42:9 64:20	provided 42:19 60:19	reading 12:20	relate 18:16	37:19 38:1
probably 14:21 36:17 37:2 64:19	providing 10:16 44:8	ready 71:6	related 6:13 10:1 14:13 17:9 18:3 18:6,9,12 24:5 26:22 64:15 70:7	39:15,22 40:8 40:12,18 41:7 41:12 42:7 44:10 46:4 48:13 50:20 51:1,8,9 52:5 53:1 57:4,4,14 57:14 58:1,19 59:9,16 61:3,8 61:9 62:1,2 63:12
procedure 59:22 59:22 60:2 71:14	provision 6:17 Provisur 1:5 5:14 7:3 71:3 72:4 73:8	24:5 26:14,14 26:16 29:12 30:6,22 31:8 33:5,15 34:11 35:3 37:13 38:18,19 42:8 42:15 44:7,14 45:20 51:19 55:5 60:15 64:21 65:1,9 66:8,22	relates 11:17 18:18 30:15	REPORTED 1:17
proceeding 6:13 8:22 10:2 12:9 13:11,15 14:16 14:20 15:6,10 15:17 30:14 31:21 33:1 61:12,20 62:12 62:15,17	Public 2:8 5:2 70:1,18	reask 25:18 57:10 66:4	relation 7:17	Reporter 2:7 5:6 5:11 48:7,9 68:11 69:4,16 69:20
proceedings 7:18	published 27:13	reason 6:4	relative 42:20	REPORTER-... 70:1
process 19:16 28:10,10	pulled 43:13	recall 63:1,2,6	relaxed 41:22	reports 7:21 9:19 13:14 14:19 23:20 30:19 31:10
processed 64:14	pulling 60:7	Recess 48:8 68:12	relaxes 43:6	request 61:13 62:9
processes 64:11	purchase 30:2,11 31:5	record 5:7 6:2 8:20 48:6,7,10 57:11 68:10,11 68:14 69:5 70:5	relaxing 41:17 42:10,15 44:21 51:3	require 54:10,12 55:22 56:14 57:21
processing 63:18 63:22 64:4,18 65:5,15 66:14 68:3	purposes 44:12	recorded 1:14 72:10,14	release 43:15	requirements 58:9
product 22:17 54:11 55:3,4 56:1,4,16,20	put 69:11	reduced 70:7	released 44:7,17	reserve 61:17 62:3
products 16:20 18:17,19,21 22:14 23:2,10 24:15,16,19 25:1,15 26:19 26:19 33:17 34:4 56:6,9,9 56:22	qualified 33:7	refer 6:20 24:13 30:14 61:14 62:10	releases 43:22	respect 16:19 19:14 22:19 23:12 27:8 31:7 31:8 32:4,13 33:13 38:17,20 39:4,6
prohibits 58:15	quantify 65:10 65:18 66:17,20 67:8	referenced 71:6	relied 62:1	RESPONDENT 3:15
project 67:14	question 8:2 14:10,21 25:18 35:15 52:8 54:15 57:10 60:20 62:4 66:5 67:1	referred 40:4	remaining 45:1	rest 61:14 62:12
projects 65:4,14 66:13,13 67:2,2 67:4,17 68:3	questions 7:11 10:15,20 11:5 45:22 59:11 68:21 69:2 71:14 72:10,13	referring 6:21 25:12 48:15 53:6 63:11	remember 51:10	review 12:9 13:9 13:13 21:16 28:17 71:8
proposed 33:17 34:4,10	quick 10:13	refresh 12:3 23:20	REMOTE 1:13 2:4	reviewed 9:21
provide 6:5,15	quite 8:1	refreshing 17:18	removable 11:19 12:1,22 24:14 24:18,22 25:15 27:8 35:12,17 55:8	
	quote 25:15	regarding 6:16 12:1 14:2,6 30:1,19,20 32:15	remove 45:17,18 45:19 60:1 63:13	
	R	regurgitating 31:9	removed 21:7,9 44:18 53:4,8,18 54:1 55:17 57:18 59:2,17 59:19 63:14	
	R 3:1	reintroduction 27:9	removes 43:19	
	read 9:15 11:13 11:13 12:5,13 12:13,18 13:2		removing 11:17 44:20	
			repeat 24:21 52:8	
			repeatedly 65:20	
			rephrase 7:11	
			report 4:9 6:19 9:11,13 11:14 14:7,15 15:12 15:16,22 18:15	

10:4 23:20 27:4 62:13,19 reviewing 12:16 24:4 28:19 29:14 60:21 61:18 revisit 34:15 right 7:14 24:6 32:16 48:5 61:17 68:13 69:7 rotated 43:15 48:20 49:6 rotation 43:5 rough 69:8,15 Rules 71:14 rulings 9:22	61:4 September 70:11 71:4 72:5 73:10 set 9:19 70:11 shafts 60:12 shape 28:9 sheet 71:11 72:11 73:6 SHORTHAND 70:1 show 59:20 shown 36:8 59:19 60:15 shows 51:9,21 52:12,15 sic 40:12 sides 45:10,13 46:16 47:1 sign 71:7,8 signature 71:6,12 72:4,17 73:22 signed 71:11 significantly 29:16 signing 71:10 similar 45:22 47:4 50:16 60:17 Sincerely 71:18 single 36:15 sit 19:4 24:6 32:4 32:16 sitting 21:19 30:10 31:3 32:6 32:18 34:2 67:15,22 size 29:4 skill 57:19 slice 26:19 slicer 56:9 slicers 25:10 26:7 47:14 slicing 21:3 28:2 28:4,10 56:6,21 slightly 43:7,17 slip 7:8,13 solely 25:5 31:10	sophisticated 26:20 sorry 26:2,3 40:8 57:7,9 63:3 sort 17:7 19:21 31:13 33:3,12 36:6 40:22 43:1 60:17 Sound 10:22 span 59:8,15 speak 13:17,20 speaking 65:21 specific 15:22 16:9,9 28:9 38:20 65:18 specifically 11:16 21:6,8,13 23:5 27:3 29:5 56:3 56:20 58:14 59:4 62:4 specificity 21:4 speed 26:21 spells 21:1 spend 12:16 spent 65:4,12 66:11 67:16 68:1 St 5:9 stand 21:17 standing 69:7,11 standpoint 23:19 start 67:20 state 2:8 5:3,6 6:1 40:15 41:4,22 54:9,10,19,21 54:22 55:2 70:19 STATES 1:1 stenographically 70:6 stop 66:1 Street 1:21 72:1 73:2 strike 35:15 50:13 53:12 61:17 67:19 structure 37:7	38:4 submit 15:16 submitted 7:21 13:10,14 14:16 14:18 15:2 30:18 subsidiary 8:10 substructure 37:22 38:10,13 39:1 success 17:22 18:13 Suffolk 70:20 Suite 1:21 3:17 71:2 72:1 73:2 summarize 64:3 sure 6:3 8:1 9:1 11:8,12 19:19 26:10 27:22 37:15 39:12 41:13 42:22 43:11 44:3 47:11 48:4 49:16 64:6 suspended 45:4,8 45:11 sworn 5:2 synthesis 64:22	technique 59:5 Technologies 1:5 5:14 7:4 71:3 72:4 73:8 tell 19:5 33:9 62:18 tension 42:1 43:19,22 44:3,6 44:8,15,17,20 45:2,6,9,10,13 45:18 46:4,13 46:16,22 47:12 47:15 48:21 49:7,14 50:2,6 51:22 54:7,17 tensioned 53:16 tensioning 49:1,3 50:17 51:10 term 16:2 28:7 44:9 46:3 67:12 terminology 21:22 25:21 terms 16:17 28:8 34:12 35:19 36:6 38:2,2 39:15 52:21 66:10 terribly 17:17 testified 5:3 testify 14:1,5 testifying 14:12 testimony 6:6,15 12:6 38:15 70:6 70:6 text 59:7,9,14 Textor 1:8 5:19 7:3,8,9,17 8:4,8 8:9,11,13,13,18 14:18 15:20 18:16,19,20 20:13 22:13 23:9,15 24:2,18 24:22 71:3 72:4 73:8 Textor's 9:7 24:14 25:15 33:16 34:3
S S 3:1 4:6 S6 19:3,7 23:6 same-day 69:8,14 saying 16:7 55:16 says 42:19 59:4 scheme 30:16 scope 23:16 24:3 27:14 28:14 30:4,13 33:2,19 36:21 37:12 38:15 39:2,11 49:11,21 search 11:18,22 secondary 16:14 16:17 17:2,9 section 15:21 42:7 44:10 46:4 sections 50:22 see 7:16 10:21 20:4 21:16 25:18 34:15 36:12 seen 22:1,4,6,7 22:10 50:9 selected 71:10 semantical 44:14 sense 21:2 separate 8:8 13:1			T T 4:6 take 11:2 12:5 47:19 48:1 68:8 taken 48:8 53:19 60:12 68:12 70:4,6 talk 16:19 56:20 talked 63:20 talking 9:5 21:2 25:11 talks 55:7 60:7 task 27:2 tasked 19:8 tautened 42:4,17 tautening 42:12 43:3,16 46:9 51:4 55:13	

Thank 5:11 68:21 69:1,3 theoretical 45:7 thing 44:15 45:20 51:14 60:15 things 30:17 47:8 think 9:20 16:19 19:20 20:17 23:3 24:17 25:8 28:20 30:6,16 35:19 37:2,13 41:18 42:8 43:18 44:13 46:6 51:15 53:17 56:3,19 57:9,19 59:10 63:16,20 64:19 65:16 66:22 68:7 69:7,10,14 thought 25:11 three 65:13 tightened 42:4,17 tightening 43:2 43:16 tightness 46:13 time 12:5,7,15 13:5 23:8 29:13 37:1 46:1 66:10 68:21 69:21 71:13 times 10:7,12 12:14,19 64:12 today 6:6,9 7:8 9:5 10:8,14,20 12:10,17 13:18 14:2,5 21:19 26:15 27:6 29:14 30:6,10 31:1,3 32:6,18 34:2,19 37:14 62:14 64:4 67:15,22 68:17 68:22 today's 11:11 62:19 tongue 67:20 tool 57:22	tool-free 60:3 tool-less 57:6,16 60:13 tools 21:7,10,12 53:4,9 54:3 55:18,20 57:18 59:2,5,6 63:15 tooth 60:12 topic 15:22 total 10:9 13:5 track 36:1,2,5,9 36:15 37:8 40:4 55:8 tracks 36:13,19 37:15 TRADEMARK 1:1 transcript 70:5 71:6,7 72:7 transcription 72:10,12 transport 26:18 trial 1:3 65:22 tried 38:16 67:8 true 17:5 32:6 70:5 72:9,11 truthful 6:5 try 11:1,2 43:11 44:14 51:13 trying 8:16,18 17:17 25:14 26:15 29:13 39:4 51:7,12 54:20 66:9 TS500 8:12 11:15 13:1 19:12,18 22:1 24:1,5,13 26:6 27:5,12,18 28:4 30:2,12 31:5,16 32:8 36:15 43:4 48:17 49:5 62:22 TS500's 28:5 TS700 11:15 19:12,18 21:15 21:20 22:4,6	24:9,13 26:6 27:5,12,18 28:4 28:6 29:1 30:2 30:12 31:5,16 32:8 49:5 TS750 11:16 19:12,18 22:7 24:9,14 26:6 27:5,12 29:1,8 29:18 30:2,12 31:5,17 32:8 49:2 turn 15:9 24:11 35:5 37:18 40:7 41:11,12 48:12 52:2,22 58:18 turned 48:20 Turning 57:3,13 twisted 67:20 two 20:18 27:22 29:5,17 45:5,8 type 43:7 typewriting 70:7 typically 40:21 U U.S 1:11 ultimately 8:14 unable 67:16 68:1,5 unclear 36:11 understand 6:14 6:21 7:2 8:17 10:14,19 24:15 28:17 33:5 54:20 56:13 57:20 59:12 62:9 understanding 6:18 7:5 8:1,9 9:10 10:18 15:18 16:1 17:1 19:3 20:14 23:6 28:5 33:10 38:9 47:8 48:19 50:11,15 54:14 unit 35:13,22	36:3 39:17 40:5 40:20 41:2,20 42:5,14,21 43:20 44:19 46:12 53:6,7 55:3,8,11,17,22 56:8,15 57:5,15 58:2,7,15 UNITED 1:1 unlocks 43:14 unrelated 27:2 upwards 60:10 use 7:8 25:14 utilized 53:22 54:1,5 60:1 V v 1:7 71:3 72:4 73:8 Vague 30:14 validity 9:9 variety 67:2 various 9:4,22 12:14 64:12 vehicle 50:4 versus 30:8 67:6 67:11 viable 46:7 Videoconference 1:14 Videoconferen... 2:6 3:2 virtually 2:5 visual 51:7,14,16 W waive 71:9 want 7:10 8:19 12:4 30:22 31:14 44:14 47:22 48:1 52:2 56:12 69:17 wanted 12:3 Washington 1:21 72:2 73:3 wasn't 19:8 way 19:5 25:20	27:1,1 41:20 57:1 58:5 We'll 48:5 we're 9:5 we've 40:19 47:18 63:20 Weber 7:7,8 8:8 8:10,10,14,17 15:19 18:17,19 18:21 20:13 22:13 23:1,15 24:2 Weber's 9:6 22:21 WEBER3-009... 62:5 went 19:22 weSLICE 11:16 19:11,17 22:10 23:14,21 24:14 26:7 27:5,12 29:8,17 30:3,12 31:6,17 32:8 36:10,12 43:7 43:10,12,21 50:16,19 51:6 51:18 52:3,12 58:22 59:16 60:6,21 61:5,11 62:21 WHEREOF 70:10 Willkie 3:5,11 5:15 witness 4:2 5:1,5 5:8 47:21 48:4 65:16 69:1 70:10 71:8 72:5 72:17 73:9 word 11:18,22 42:6 words 16:8,8 41:19 work 7:17 8:3,8 8:10 19:9 31:7 47:8 64:20 67:3 workable 46:8
---	--	---	--	--

worked 67:1 working 65:4,14 66:13 67:4,14 67:18 68:2 wouldn't 15:5 written 71:22 X X 4:1,6 Y yeah 25:14 44:12 69:6,14 year 11:21 14:17 66:12 years 64:8 York 2:8 5:3 70:19 Z Zoom 1:14 2:5 3:2 5:16 0 01 70:17 01/07/2027 70:22 01G06041701 70:21 052005 70:17 052005-01 1:18 09/18/2024 1:14 2:1 1 1 3:8 20:1,1,7,9 20:15,21,22 21:4,5,8,12 31:18,21,22 32:9,17,20 34:13 55:7,19 55:21 56:5,14 1:05 1:15 2:2 1[a 35:21 100 10:10 11 12:6 113 60:7 61:8 114 60:6 61:7 15 4:8	16 20:1,7,9,15,21 21:3 31:18,21 31:22 32:10,17 32:20 34:13 53:14 55:15,22 56:14 58:9,14 1730 1:21 72:1 73:2 18 71:4 72:5 73:10 18th 70:11 2 20036 1:21 72:2 73:3 2007 4:9 6:13 9:12 10:5 12:16 14:2,8 15:10,11 17:9 18:3,6,9 18:12,16 19:21 22:15 24:12 35:6,8 52:5,12 61:3 2012 38:22 39:4 39:10 49:10,19 202 1:22 72:2 202)-232-0646 71:15 202)232-0646 73:4 2024 70:11 71:4 71:20 72:5 73:10 232-0646 1:22 72:2 3 30 64:8 300 3:6,11 312 3:8,12 321 36:8 331 59:8,15 60:5 63:11 332 59:8,15 63:11 4 4:04 69:21	40W373 5:9 487 6:20 7:18 8:5 8:22 9:2 15:21 16:12 18:17,21 19:2,15,18 22:14,18,19,20 22:21 23:2,10 23:13 24:20 25:2,6 26:8 27:3 31:12,17 32:9 36:20 37:11,16 38:13 5 5 4:3 53 57:3,4,10 568 24:11 569 35:6 570 37:6 572 37:19 38:1 39:15 573 39:22 575 40:8,18 41:7 576 40:12 578 40:7 41:12 580 48:13 583 52:22 57:10 57:13,14 58:1 587 58:18 62:5 6 60654-3406 3:7 3:12 66211 3:18 71:2 7 700 3:17 36:15 43:4 62:22 71:2 7015 3:17 71:2 728 3:8,12 750 36:16 43:4 49:3 63:1 8 812 1:21 72:1 73:2 9 	9,457,487 1:11 6:16 9051 3:8 9070 3:12 90879 62:6 913.777.5617 3:18 9500 11:16 19:12 19:17 22:10 23:14,21 24:14 26:7 27:5,12 29:8,17 30:3,12 31:6,17 32:8 43:8,10,12,21 50:16,19 51:6 51:18 52:3 59:1 59:16 60:6,21 61:5 62:21 9500's 52:12	
---	--	--	--	--