

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

DBR FINANCE, INC.,	)	
	)	
Petitioner,	)	
	)	
vs.	)	Patent 11,399,535
	)	
RUGGED CROSS HUNTING BLINDS,	)	
LLC,	)	
	)	
Patent Owner.	)	

The discovery video
teleconference deposition of CHRISTOPHER SEATON,
called by the Petitioner, for examination,
pursuant to notice, taken remotely before LAURA
MUKAHIRN, CSR, RPR, CRR, within and for the
County of Cook and State of Illinois, on
October 29, 2024, scheduled to commence at 9:00
o'clock a.m.

Christopher Seaton
October 29, 2024

Page 2 1 A P P E A R A N C E S: 2 HONIGMAN, LLP 3 BY: MR. DENNIS J. ABDELNOUR 4 dabelnour@honigman.com 5 155 North Wacker Drive 6 Suite 3100 7 Chicago, Illinois 60606 8 (312)701-9300 9 -AND- 10 ESCHWEILER & POTASHNIK, LLC 11 BY: MR. THOMAS ESCHWEILER 12 195 South Main Street 13 Suite 400 14 Akron, Ohio 44308 15 (216)502-0600 16 Appeared on behalf of the Petitioner; 17 WOLTER, VANDYKE, DAVIS 18 BY: MR. ROBERT L. WOLTER 19 rwolter@savvyiplaw.com 20 1900 Summit Tower Boulevard 21 Suite 140 22 Orlando, Florida 32810 23 (407)926-7700 24 Appeared on behalf of the Patent Owner. 25	Page 4 1 (Witness sworn.) 2 CHRISTOPHER SEATON, 3 called as a witness herein, having been first 4 duly sworn, was examined and testified as 5 follows: 6 Examination 7 By Mr. Abdelnour 8 Q. Good morning, Mr. Seaton. I'm Dennis 9 Abdelnour from Honigman. I represent DBR. Have 10 you been deposed before? 11 A. I have. 12 Q. How many times? 13 A. I don't know, a lot. 500 maybe, 400. 14 I don't know. A lot. 15 Q. Depositions, 400 -- 16 A. Yes. When I was a detective with the 17 Hillsborough County Sheriff's Office, homicide 18 detective, undercover detective; long time ago. 19 Q. Okay. So in your capacity as a law 20 enforcement officer, you were -- you have been 21 involved in the legal process, and you've been 22 deposed many times, I take it? 23 A. Correct. 24 Q. How about outside of the context of 25 your work as a law enforcement officer? Have
Page 3 1 I N D E X 2 Examinations Page 3 Examination 4 4 By Mr. Abdelnour 5 Examination 115 6 By Mr. Wolter 7 Re-Examination 125 8 By Mr. Abdelnour 9 10 E X H I B I T S 11 No. Page 12 Exhibit 2032 22 13 14 15 16 17 18 19 20 21 22 23 24	Page 5 1 you ever been deposed? 2 A. I have not. 3 Q. Okay. For the record, can you state 4 your name and address? 5 A. Christopher Seaton. 15206 Tilwood 6 place, Tampa, Florida 33618. 7 Q. Let -- you've obviously been deposed. 8 Let me just run through a couple of the ground 9 rules and framework for today. So you 10 understand you're under oath, correct? 11 A. (Nodding head.) 12 Q. And you have to give us an audible yes 13 or no. 14 A. Oh, yes. I thought I said that. 15 Q. It's okay. That's my next instruction: 16 Just head shakes and -- we're not being 17 videotaped, so everything's being transcribed. 18 So please make sure everything is audible, if 19 that's okay. 20 A. Yes. 21 Q. Okay. You understand that I'm asking 22 questions and that you have to answer those 23 questions? 24 A. Correct. 25 Q. You understand that your counsel's

Page 6 1 going to object from time to time, I assume, but 2 nevertheless, you still have to provide an 3 answer? 4 A. Correct. 5 Q. If you don't hear a question, please 6 let me know. 7 A. Correct. 8 Q. If you don't understand a question, 9 please also let me know. 10 A. Yes. 11 Q. If you answer, can we agree that you've 12 heard and understood my question? 13 A. Yes. 14 Q. Any reason -- Is there any reason you 15 cannot give a full, complete, and truthful 16 testimony today? 17 A. No. 18 Q. Mr. Seaton, you understand that this 19 deposition is in connection with a patent office 20 challenge to the validity of Patent No. 21 11,399,535? 22 A. Correct. 23 Q. And you are one of the named inventors 24 of the -- can I call it the '535 patent? 25 A. Correct.	Page 8 1 Q. Does Rugged Cross sell any products? 2 A. No. 3 Q. Can you tell me what the business of 4 Rugged Cross is? 5 A. We license out our technology to 6 manufacturers and -- who's basically a 7 royalty-based model. We used to manufacture. 8 We no longer manufacture just because we don't 9 have the time. 10 Q. When you say you license out the 11 technology, what do you mean by technology? 12 A. Our patent technology. 13 Q. So patent licensed, correct? 14 A. Mm-hmm. Yes. 15 Q. Is there any other technology that you 16 license along with the patents? 17 A. No. 18 Q. You said you used to manufacture. When 19 was the last time Rugged Cross manufactured 20 product? 21 A. I can't really give you an estimate. 22 We custom-make some blinds for some people here 23 and there. The last time was maybe a year and a 24 half ago possibly. We manufacture -- we made 25 some for some charity events that we give back
Page 7 1 Q. And you are one of the named inventors 2 of the '535 patent? 3 A. Yes. 4 Q. And the '535 patent is owned by Rugged 5 Cross Hunting Blinds, LLC; is that right? 6 A. Correct. 7 Q. And are you an owner of Rugged Cross 8 Hunting Blinds? 9 A. I am. 10 Q. For reference and ease today, can we 11 simply call it Rugged Cross? 12 A. Yes. 13 Q. And who else is an owner of Rugged 14 Cross Hunting Blinds? 15 A. My brother. 16 Q. Is that Tim Seaton? 17 A. Yeah. Timothy, yes. 18 Q. Other than you and your brother, are 19 there any other owners of Rugged Cross Hunting 20 Blinds? 21 A. No. 22 Q. Does Rugged Cross have any employees? 23 A. No. 24 Q. Does Rugged Cross manufacture anything? 25 A. No.	Page 9 1 to our community in Tampa, but other than that, 2 that's about it. 3 Q. I take it it's not a full-scale 4 manufacturing process or business? 5 MR. WOLTER: Objection. 6 THE WITNESS: No. 7 MR. WOLTER: Go ahead and answer to the 8 extent you can, Chris. 9 THE WITNESS: Can you repeat the question? 10 MR. ABDELNOUR: Laura, would you read the 11 question back? 12 (Record read back.) 13 THE WITNESS: I really don't know what a 14 full-scale -- what that entails, so I don't know 15 how to answer that question. 16 BY MR. ABDELNOUR: 17 Q. Since you've been in business, how 18 many -- I take it the product that you make on a 19 custom basis are hunting blinds, correct? 20 A. Correct. 21 Q. Anything else? 22 A. No. 23 Q. How many -- since Rugged Cross has been 24 in business, how many hunting blinds have they 25 manufactured?

Page 10 1 MR. WOLTER: I'll raise an objection to this 2 line of questioning as beyond the scope. 3 THE WITNESS: Yeah. Dennis, can you show me 4 where that is in my declaration, what paragraph 5 and page, please? 6 BY MR. ABDELNOUR: 7 Q. No, no, no. I'm just asking you a 8 question. And I don't need an exact number, I 9 just want to know ballpark, how many hunting 10 blinds has Rugged Cross made? 11 A. It would be me speculating, so I don't 12 want to speculate. I have no idea. 13 Q. More than 10? 14 A. More than 10. 15 Q. More than 100? 16 A. I have no idea. 17 Q. More than 1,000? 18 A. It's not more than 1,000. But, again, 19 I have no idea. I wasn't -- I don't have any of 20 that in front of me. If you have something that 21 says my numbers, can you show it to me? 22 Q. I don't have your numbers, that's why 23 I'm asking. 24 A. Well, I mean I was just prepared for 25 what's in this declaration. So, like I said, I	Page 12 1 A. Yes. 2 Q. Is that testimony correct? 3 A. The only thing that is not correct, he 4 was actually four. I don't know where six came 5 from. He was born in 2011, so he was actually 6 four at that time, almost four, so not six. 7 Q. Now, you say you were an avid hunter, 8 so I take it you've used hunting blinds before 9 2015, right? 10 A. Actually, no. I was actually more of a 11 climber and used tree stands. I never -- in 12 Florida it's just too hot, and we don't really 13 use pop-up-style blinds. I usually hunted 14 management areas, so I had to take in climbers. 15 That's all I could afford at the time. So we 16 would get permits, and basically I never 17 really -- I never owned a pop-up blind. 18 Q. Had you ever owned any hunting blind? 19 A. Nope. 20 Q. Had you ever used a hunting blind to 21 hunt before 2015? 22 A. No. 23 Q. Had you ever used a hunting blind to 24 hunt before 2015? 25 A. No.
Page 11 1 don't have any of that information, and I don't 2 want to speculate. 3 Q. Okay. So, Mr. Seaton, you have a 4 bachelor's degree in exercise science; is that 5 correct? 6 A. Correct. 7 Q. Your brother has a bachelor's degree in 8 psychology, correct? 9 A. Yes. 10 Q. In your declaration, you talk about 11 building a hunting blind in 2016 for your son. 12 Do you recall that testimony? 13 A. I do. Can you give me the paragraph 14 and the page number, please, we're talking 15 about? 16 Q. Certainly. We're starting at the first 17 two pages of your declaration, Paragraph 6. 18 A. Okay. 19 Q. "Tim and I came up with the idea of 20 using a banner mesh material for use in a 21 hunting blind in 2015." Do you see that? 22 A. Correct. 23 Q. And you say: We were looking to build 24 a hunting blind so I could hunt with my son who 25 was six years old at the time. Do you see that?	Page 13 1 Q. I take it you'd agree you did not have 2 two years of practical experience designing 3 hunting blinds as of 2015, correct? 4 A. Correct. Are you saying that I said 5 that somewhere? 6 Q. No, no, no. It's just a question. 7 A. I was just asking. I was just -- 8 Q. No, no. That's fine. And so just so 9 we're on the same page for the course today. If 10 there's something I want to -- I'm going to 11 quote from or point you to in your declaration, 12 I'm going to try to do that. And I'm going to 13 try to be very explicit about it. 14 A. Yes, sir. 15 Q. I take it you don't have a bachelor's 16 degree in mechanical engineering, correct? 17 A. No. 18 Q. Or a bachelor's degree -- you don't 19 have a bachelor's degree in physics, correct? 20 A. No. 21 Q. You don't have a bachelor's degree in 22 textile engineering, correct? 23 A. No. I do have another degree, though. 24 Q. What's your other degree? 25 A. Master of science in criminal justice.

Page 14 1 Q. Okay. Did you ever work in the textile 2 industry? 3 A. No. 4 Q. Any practical experience in textiles or 5 materials? 6 A. No. 7 Q. Did your brother have any practical 8 experience in textiles or materials? 9 A. Nope. 10 Q. Did your brother have any practical 11 experiences designing hunting blinds? 12 A. No. He never even hunted, not once. 13 He's a fisherman, and lobsters, and plays golf. 14 Q. Mr. Seaton, can you please describe 15 your invention? 16 A. Can I describe it? What are you asking 17 to describe, just curious? 18 Q. Well, I'll -- can you tell me what, in 19 your view, was inventive that you came up with 20 that was different than what came before? 21 MR. WOLTER: I'm going to object as outside 22 the scope of the direct testimony. 23 BY MR. ABDELNOUR: 24 Q. You can answer. 25 A. It's just your question is confusing,	Page 16 1 I don't know, Redneck or one of the box-style 2 blinds, the windows were super high. And at 3 that point I was -- how is he going to be able 4 to see out the window when I'm shooting? The 5 windows were way high. Basically at that point 6 they were like 1500 bucks, \$2,000, something. 7 Like I said, I'm in law enforcement; working 8 long hours, too, but still wasn't in the budget 9 to spend that much money. Every, I don't know, 10 twice a month we have dinner with my family, you 11 know, at my brother's house. And my mom and dad 12 and me and my brother were talking, and he had 13 no clue, but he is a contractor -- go ahead. 14 Did somebody say something? 15 Q. No. 16 A. He was a contractor, and basically was 17 like: Well, how big does it have to be? And I 18 basically told him. About the windows, he goes: 19 We can just change the windows. We can build 20 that thing for less money. Do you want to do 21 that? And I'm like sure. And he's got a shop 22 in the back of his house and had some extra 23 extruded aluminum from his other company, and 24 basically that's how it happened. I mean 25 inventing something, that's -- it's all -- I
Page 15 1 like I'm not understanding. Can you repeat or 2 ask me -- or are you asking why I developed it 3 or -- that's like an open-ended question to me. 4 So I'm just asking you exactly what you want me 5 to answer. 6 Q. Yeah. And just so we're on the same 7 page. I'm going to ask open-ended questions, 8 because I do want you to answer. And I want to 9 hear your testimony. So I'm going -- let me try 10 again, and I want to keep it as simple as 11 possible. 12 A. Okay. 13 Q. Can you simply describe for me what you 14 invented when you developed the hunting blind 15 that's the subject of the '535 patent? 16 A. I -- and I did not go into this with 17 doing nothing but tried to make a blind for my 18 son. At that time I -- like I said, I had never 19 been in a pop-up blind, never been in a house 20 blind. I was always a tree-stand climber. I 21 felt guilty as a father with all the long hours 22 that I was working. My second child was just 23 born, Austin was getting older. I felt like a 24 bad dad. All I was doing was trying to buy a 25 blind. Once I went to the store and looked at,	Page 17 1 didn't go into this to try to get in this 2 industry. To be honest with you, if I had to do 3 it all over again -- I don't want to be sitting 4 here going through what we've gone through. I 5 don't -- what I put my family through the last 6 couple years, you wouldn't believe it. 7 Financially, mentally what it's done to my wife 8 and kids, just for something I was doing for my 9 son, and that's the truth. So I mean if you 10 want to explain my invention, yeah, it happened, 11 we came up with a blind that was awesome. I've 12 never seen anything like it, you know, because 13 now I just looked at these box-style blinds 14 looking for my son to, you know, to hunt with 15 me. And that's what I've already seen, like, 16 man, how can you see out of this? Because I'm 17 used to being in a tree stand. I'm used to 18 being in a climber 40 feet up. I can't take my 19 four-year-old up in a climber or anything. So 20 when I was inside these blinds in the store, you 21 know, it was like, man, how's he going to see? 22 You know what I'm saying? So that's when I 23 noticed the blind spots. And then when I first 24 went into our blind, you know, we had, you know, 25 the blotches, you know, where the first material

Page 18 1 came through and then spray-painted it 2 instantaneously. And then we reprinted that 3 material, right. And as soon as I walked in -- 4 actually, my brother did it. My brother called 5 me and he goes: Get over here, man. I don't 6 know anything about hunting, but this thing is 7 crazy cool. I was like really? Awesome. 8 Hauled butt over to his house; he maybe lives, I 9 don't know, at that time maybe three minutes 10 from me. My mom, my dad, and my brother, we 11 live probably within a mile of each other. And 12 I'm like, no kidding. Wow. I couldn't believe 13 it. And that's how it happened, man. 14 That's -- so that's our story. And so 15 it's kind of hard when you're talking about can 16 you -- you know, intention, you know, I want to 17 say I think your question was like planned, but 18 it was not planned. I didn't have the money to 19 start this, you know. If I had to do it all 20 over again, like I said, I wouldn't have done 21 it. I wouldn't have done it. If I -- the -- 22 what it's cost me and my family. And then 23 second -- the only thing that I do -- I do 24 agree, and I'm glad, is seeing a grandfather or 25 a father being able to hunt with their kids and	Page 20 1 Q. My question's a little bit different. 2 A. Okay. Sorry. I misunderstood. 3 Q. No, that's okay. That's why I'm going 4 to ask again and try to do it a little bit 5 differently. 6 What differentiated the blind that you 7 created in 2015 from blinds that were already 8 commercially available at that time? 9 A. There was no commercially available 10 see-through hunting blind at that time. 11 Q. So the see-through aspect, correct? 12 A. And not being able to see in. I think 13 it's well-documented in our industry and the 14 awards that we have won that there was not one 15 in the market based on the social media traffic 16 that this thing has generated, the awards, and 17 the countless, hundreds of articles that it 18 shows from this -- that this declaration only 19 shows a handful. 20 Q. So the see-through aspect, can we refer 21 to it as the one-way viewing aspect or one-way 22 viewing feature? Is that fair? 23 A. However you wish to, you know, want to, 24 you know, keep it and describe it for this depo 25 purposes, absolutely.
Page 19 1 not having to worry about the elements or the 2 distraction that a kid -- to make it easier on a 3 kid and the father or grandfather mentally; 4 that's why this is all worth it. 5 Q. Can I try to get you to pin down what 6 was different about the blind that you created 7 for your son in 2015 from blinds that were 8 otherwise available on the shelf? 9 A. You're talking about like the pop-up 10 style that's in the industry? Is that what 11 we're talking about right now? What's the 12 difference between those and my box-style blind, 13 I guess you'd call it, house blind, like a 14 structural blind, I guess. Is that -- I mean I 15 don't understand. It was the same thing. The 16 main difference we're talking about here is a 17 see-through material, and that's no different. 18 That's the same material. So in that aspect, 19 there's nothing different. 20 Q. I'm sorry. I think I missed it. What 21 aspect is nothing different? 22 A. There's nothing different with the 2015 23 blind and the blinds today, because the 24 see-through material, you can see out, and 25 nothing can see in.	Page 21 1 Q. Okay. I mean how would you describe 2 that feature? I just want to -- I'd prefer to 3 use your words. 4 A. I mean, you know, it's one-way 5 see-through mesh, you know. Use that. Let's 6 use that. 7 Q. Okay. Other than the one-way 8 see-through mesh, was there anything else that 9 you considered inventive about the blind that 10 you created in 2015? 11 MR. WOLTER: Again, I'll object as beyond the 12 scope. 13 THE WITNESS: I mean do I answer? Do I not 14 answer? 15 BY MR. ABDELNOUR: 16 Q. Please answer. 17 MR. WOLTER: To the extent you can. I'm just 18 making the objection as a matter of record. 19 THE WITNESS: Yeah. You know, you have the 20 wind flow different, and the, you know, one-way 21 see-through mesh. 22 BY MR. ABDELNOUR: 23 Q. Okay. Anything else? 24 A. No. 25 Q. And when you say wind flow, are you

Page 22 1 talking about ventilation due to the fact that 2 there's holes in the mesh? 3 A. Correct. 4 Q. Okay. Did you believe that you had 5 created anything structurally about the blind 6 that was patentable, putting aside the 7 see-through mesh? 8 A. Extruded aluminum. I've never seen 9 that. But, again, I am not an engineer. I am 10 not a patent lawyer. So I can't really tell 11 you. Again, I didn't get on this with mine 12 is -- we didn't have -- we didn't even have 13 anything drawn up. I didn't have no spec 14 sheets. So, again, I can't really tell you 15 that. 16 Q. In your declaration -- and, by the way, 17 for the record, your declaration is 18 Exhibit 2032. 19 (Seaton Deposition Exhibit 2032 20 was remotely introduced and 21 provided electronically to 22 the reporter.) 23 BY MR. WOLTER: 24 Q. In your declaration, Paragraph 6, you 25 mentioned that you and your brother came up with	Page 24 1 your 2015 blinds, was that something that you 2 purchased? 3 A. I'm sorry? 4 Q. Is the banner mesh that you used 5 something that you had purchased? 6 A. Yes. 7 Q. Did you do anything to the mesh to 8 change its characteristics? 9 A. No. 10 MR. WOLTER: I'm going to object to that 11 question as lack of foundation. 12 BY MR. ABDELNOUR: 13 Q. Did -- in Paragraph 11 of your 14 declaration, you say the mesh material was 15 white, so we applied a camouflage pattern. The 16 camouflage pattern was applied using an 17 eco-solvent ink from an ink cartridge. Do you 18 see that? 19 A. Mm-hmm. 20 Q. Who applied the pattern to the banner 21 mesh? 22 A. We had a firefighter friend that had a 23 print company, and we asked him to print a camo 24 pattern on that material. 25 Q. Did you provide him with a camouflage
Page 23 1 the idea of using a banner mesh material. What's 2 banner mesh? 3 A. Banner mesh is a material used for wind 4 flow, to put on fencing, to put on high-rises, 5 something where you don't have to worry about it 6 taking flight and create like a parachute on a 7 building or on a fence structure. 8 Q. And you were familiar with banner mesh 9 in 2015? 10 A. Yes. 11 Q. In what context? 12 A. It was just something we used at the 13 baseball fields to put advertising on for 14 things. 15 Q. How do you put advertising on a banner 16 mesh? 17 A. You print it on there. 18 Q. And for ink printing? 19 A. Correct. 20 Q. And you said you're familiar with using 21 banner mesh at baseball games? 22 A. Yeah. It's what our -- we put on the 23 fence for people that supported the community 24 baseball leagues. 25 Q. Now, the banner mesh that you used with	Page 25 1 pattern to print? 2 A. I just told him to pick one off-line. 3 It was bootleg. 4 Q. I want to come back to the banner mesh 5 in a second. Now, you'd agree with me that 6 pop-up blinds, hunting blinds were on the market 7 before your invention, correct? 8 A. Correct. 9 Q. For example, I believe Primo said they 10 had their Double Bull Blind on the market since 11 1996, correct? 12 A. Correct. 13 MR. WOLTER: I'm going to object on lack of 14 foundation. I don't think that's what -- are 15 you referring to someone's testimony, Dennis? 16 MR. ABDELNOUR: You can lodge your objection, 17 but I get to ask the questions. 18 BY MR. ABDELNOUR: 19 Q. Would you agree with me that mesh 20 material had been used with hunting blinds 21 before 2015? 22 A. Mesh? 23 Q. Mesh. 24 A. Before I knew about them or what? 25 I'm -- you got to be more specific with the

Page 26 1 dates. Are you talking about now, or are you 2 talking about in 2015? 3 Q. 2015. 4 A. 2015, again, I had no clue about 5 hunting blinds period. 6 Q. Okay. Are you aware now that there 7 were hunting blinds before 2015 that used mesh 8 material? 9 A. I think if you want to say mesh -- and, 10 again, do you want to say mesh, but it was more 11 like a screen, and you could see right through 12 that stuff. And they were using it more which 13 is well documented that -- for mosquito control, 14 not to hide the person inside. It was a very 15 thin material, and it wouldn't even have worked 16 on our blind because it was too thin because I 17 had to use a spline groove for it. It would 18 have ripped right out it was so thin. It's 19 actually thinner than the screen they screen 20 pool cages with, to show you how thin it is. 21 Q. Going back to printing the camouflage 22 pattern on the mesh. Did you or your brother 23 provide any changes to the standard way printing 24 would have been done on a banner mesh? 25 A. No.	Page 28 1 available at that time or before. Fair? 2 A. Yes. 3 Q. Okay. Sorry. That was a yes? 4 A. Yes. 5 Q. And I'm sorry. You have to bear with 6 me because I just want to make sure we get the 7 clean record. And so now my question is sitting 8 here today and since you've been in the business 9 of licensing your patents, have you become aware 10 of what's called prior art or the types of 11 hunting blinds that existed before your 12 invention? 13 A. I guess you would say allegations from 14 nonlicensees, yes. 15 Q. Let's move ahead. You talk about 16 displaying your blind in 2016 at a trade show, 17 correct? 18 A. Can you give me the paragraph, please, 19 and the page number. 20 Q. Sure. Paragraph 19. 21 A. I'm sorry. I'm just trying to make 22 sure we're on the same page. That's all. 23 Q. That's all right. 24 A. Go ahead. 25 MR. ABDELNOUR: Okay. Laura, would you read
Page 27 1 Q. Okay. Were you aware that banner mesh 2 with advertisements or other patterns on them 3 can provide a one-way viewing feature? 4 MR. WOLTER: Objection. Lack of foundation. 5 BY MR. ABDELNOUR: 6 Q. You can answer. 7 A. No. 8 Q. Sitting here today, have you made 9 yourself knowledgeable about the state of 10 hunting blinds before your invention? 11 MR. WOLTER: Objection. Beyond the scope. 12 BY MR. ABDELNOUR: 13 Q. You can answer. 14 A. What are you asking, before my 15 invention or after? You said before have I -- 16 I'm confused. 17 Q. Let me break this down into pieces, and 18 I want to be sure I have it -- 19 A. I'm sorry. Just -- 20 Q. No, that's okay. And let me try it a 21 different way. 22 A. Okay. Go ahead. 23 Q. I believe your testimony is that as of 24 2015, you were unaware of the features of 25 hunting blinds that would have been commercially	Page 29 1 that question back again? 2 (Record read back.) 3 THE WITNESS: Yes. 4 BY MR. ABDELNOUR: 5 Q. When did you start building the blind 6 for your son in 2015? Can you be more specific? 7 A. It had to be around -- probably around 8 this time, maybe October, if I had to say. It 9 was around hunting season. I knew I couldn't 10 bow hunt with him, so I would say October, 11 November. 12 Q. Okay. And so then within some number 13 of months, by February of 2016 you had a full 14 hunting blind that you were able to show at a 15 trade show, correct? 16 A. Yes. 17 Q. Did you use the hunting blind before 18 you showed it at a trade show? 19 A. Maybe like one time, once or twice. 20 Q. And the blind you displayed at the 21 trade show, you called it the Austin, correct? 22 A. Yeah, after my son who we originally -- 23 who this whole thing came about, my oldest son, 24 yes, sir. 25 Q. Okay. So if I refer to the Austin

Page 30 1 blind, that's the blind that was shown in the 2 2016 trade show, fair enough? 3 A. Mm-hmm. 4 Q. Okay. In Paragraph 19 you have a 5 hyperlink to a YouTube video. Do you see that? 6 A. Mm-hmm. 7 Q. And you have screenshots of that 8 YouTube video as an exhibit to your declaration, 9 correct? 10 A. Correct. But I don't have the exhibits 11 in front of me, if you want to pull them up. 12 Q. Sure. All right. Let me know if you 13 can see -- I pulled up your declaration here. 14 Let me know if you can see that. 15 A. Yeah. I see the declaration. 16 Q. Okay. 17 A. I just don't see the exhibits. 18 Q. So if I scroll to the end of your 19 declaration, there's Exhibit B. 20 A. Mm-hmm. 21 Q. Do you see that? 22 A. Yep. 23 Q. And that looks like what you've 24 described as a screenshot of this YouTube video? 25 A. Mm-hmm.	Page 32 1 Q. Did you add those annotations, or was 2 it your attorney? 3 A. My attorney. We've obviously talked 4 about it. 5 Q. If you look at Exhibit E, this is an 6 article that you've attached to your 7 declaration, correct? 8 A. I don't see it. 9 Q. I've got it on the screen here for you. 10 Do you see it? 11 A. Yes. 12 Q. So this is an article written by Josh 13 Honeycutt called Cool Hunting Gear from the 2016 14 NWTF Convention. Do you see that? 15 A. Yep. 16 Q. And it's dated February 17, 2016. Do 17 you see that? 18 A. Right. 19 Q. In your declaration you say that the 20 Austin was displayed at the 2016 National Wild 21 Turkey Federation Convention in February 2016 in 22 Nashville, Tennessee. 23 A. Mm-hmm. 24 Q. Do you know the specific dates it was 25 displayed?
Page 31 1 Q. And this is a YouTube video hosted by 2 somebody called Becky Lou Outdoors. Do you see 3 that? 4 A. Mm-hmm. 5 Q. And Exhibit C is another screenshot 6 from the same video. Do you see that? 7 A. Mm-hmm. 8 Q. Exhibit D as well, correct? 9 A. Right. 10 Q. If I go back to Exhibit B, there's a 11 number of annotations on this screenshot. Do 12 you see those? 13 A. No. It's too small. Maybe I can -- 14 hold on. Let me try to Zoom it in. 15 Q. I can Zoom in for you a little bit. Do 16 you see where it says Roof 14 at the top there? 17 A. Mm-hmm. 18 Q. Roof Frame Member 20? 19 A. Yep. Okay. 20 Q. Did you add those annotations to this? 21 A. I did not. 22 Q. Do you know who did? 23 A. I'm sure it was my attorney. 24 Q. And the same with Exhibit C and D? 25 A. Correct.	Page 33 1 A. Yeah. Actually, I do, because that's 2 2016. I haven't been home for Valentine's Day, 3 because every year it's on Valentine's Day. So 4 my wife always reminds me. So it was 5 Valentine's Day 2016. 6 Q. Okay. So February 14, 2016? 7 A. Somewhere around there, yeah. 8 Q. How many days was the convention? 9 A. I don't know if that one -- it used to 10 be like a Thursday, Friday, Saturday, Sunday. 11 And then they -- I don't know when they stopped 12 and they went Friday, Saturday, Sunday. So it 13 varies. Three or four days. I don't know if 14 that was a four-day or a three-day. They backed 15 it down. I know one year they didn't have it on 16 a Sunday. So I mean this is -- what was that, 17 eight years ago. 18 Q. Okay. Now, if I go to Paragraph 19 19 from your declaration -- and I've got the PDF 20 version up on the screen. Do you see that? 21 A. Mm-hmm. 22 Q. Okay. If I click through the hyperlink 23 you provided in the declaration, it's going to 24 take me to the YouTube video, correct? 25 A. Mm-hmm.

Page 34 1 Q. All right. So I'm going to do that. 2 Let me see. I want to reshare my screen. Okay. 3 So let me see if -- okay. So let me do that 4 again, okay. I've got -- now I've got a web 5 browser on one side of the screen and your 6 declaration on the other. So if I click 7 through, again, it opens up the YouTube page 8 and a video starts to play. Do you see that? 9 Were you able to follow that, Chris? 10 A. Yep. 11 Q. Okay. 12 A. Yes. 13 Q. So let's see. So the video it takes me 14 to is called Rugged Cross Blinds 2016 NWTf show. 15 Do you see that? 16 A. Yes. 17 Q. Okay. And it's posted by Becky Lou 18 Outdoors. Do you see that? 19 A. Mm-hmm. Yes. 20 Q. And below that it says 6653 views. Do 21 you see that? 22 A. Yes. 23 Q. And then it says February 14, 2016. Do 24 you see that? 25 A. Yes.	Page 36 1 inside the blind and talks about how you can't 2 see inside but you can see outside for a blind, 3 right? 4 A. Yes. 5 Q. Let's go back to your declaration. 6 Exhibit E is an article discussing the Austin 7 blind from February 17, 2016, correct? 8 A. Yes. 9 Q. And Exhibit F is also an article 10 discussing the Austin blind from the February 11 14, 2016 NWTf trade show, correct? 12 A. Yes. I'm just trying to find -- yes. 13 Q. Okay. And here I believe it's several 14 pages into that, into Exhibit F where it 15 discussed the Rugged Cross blinds. Do you see 16 that? 17 A. It's where the author says: We came 18 across a very unique new blind concept? 19 Q. Correct. And that's discussing the 20 Rugged Cross blinds from the trade show in 2016, 21 right? 22 A. Correct. 23 Q. The Austin blind uses the extruded 24 aluminum that you described in your declaration, 25 correct?
Page 35 1 Q. Would you agree that this video would 2 have been posted on February 14, 2016? 3 MR. WOLTER: Objection. Lack of foundation. 4 THE WITNESS: I have no idea. I guess. I 5 mean I didn't post the video. 6 BY MR. ABDELNOUR: 7 Q. When did you first see the video? 8 A. I don't even -- I can't even recall. I 9 mean this was eight years ago. It was our first 10 show. I can't say when I first saw Becky Lou's 11 video. 12 Q. Now, do you agree with me that this is 13 a video showing the Austin blind at the NWTf 14 show from the February 14, 2016 timeframe? 15 A. Yes. 16 Q. And if we watch this video -- which I 17 have; we don't need to do it here -- you'll 18 agree with me that this shows the full structure 19 of the blind, correct? 20 A. Correct. 21 Q. And it shows the banner mesh one-way 22 viewing feature, correct? 23 A. Yes. 24 Q. So, for example, she takes a video of 25 the outside of the blind, and she takes a video	Page 37 1 A. Yes. 2 Q. You agree with me that the Austin blind 3 is not a pop-up blind, right? 4 A. Correct. 5 Q. The one-way mesh that you used in the 6 Austin blind, is it the same mesh that is used 7 in the later Primos products that you discuss in 8 your declaration? 9 MR. WOLTER: Object as lack of foundation. 10 THE WITNESS: Can you repeat the question? 11 MR. ABDELNOUR: Can you please read the 12 question back? 13 (Record read back.) 14 THE WITNESS: Yes. 15 BY MR. ABDELNOUR: 16 Q. That Paragraph 31 and 32 and 33 of your 17 declaration, you discuss an interaction with 18 Jason Harris of Primos Hunting, correct? 19 A. Yes. Correct. 20 Q. And you discuss how Mr. Harris 21 approached you at the 2016 NWTf convention, 22 right? 23 A. Correct. 24 Q. And what did Mr. Harris say when he 25 approached you? What do you recall about that

Page 38 1 discussion? 2 A. It was very quick. It was packed. Our 3 booth was packed. He came in. He knew we were 4 busy. We had large crowds. We had -- I think 5 we had -- I don't know if we had one or two set 6 up at that one. So he barely got in, I remember 7 him squeezing in, and he just popped in real 8 quick and basically -- actually, the first time 9 he came by and talked to my brother and said 10 he'd be back when it was, you know, a little 11 slower. I was in the bathroom or something. So 12 a couple hours later he came back when I was 13 there, basically wanted -- talked about our 14 blind, basically couldn't believe it, would love 15 to -- if we would entertain talking to Vista 16 Outdoors, which was owned by -- which is the 17 parent company of Bushnell -- Bushnell's sister 18 company who was under Primos, and they'd love to 19 talk to us; they never seen anything like it. 20 And said they would love, love the opportunity 21 to maybe look at getting it into their Double 22 Bull, which was, I guess at that time like the 23 icon of the industry, one of the first pop-up 24 blinds. I don't know. So that's basically how 25 it went; and gave me a business card and said:	Page 40 1 was very excited. I want to say it was -- it 2 wasn't even like weeks. It was a while. I 3 can't tell you how long. But it wasn't like 4 right when we got -- we jumped on the 5 opportunity. I can tell you that. 6 Q. A couple months. 7 A. Probably. 8 Q. Okay. We're talking about the '535 9 patent. And on the '535 patent is listed a 10 provisional application filed on February 29, 11 2016, right? 12 A. Mm-hmm. 13 Q. And that's a few weeks after the trade 14 show, correct? 15 A. Correct. 16 Q. Just so I have the timeline, are you 17 saying that you made sure you had your 18 provisional application filed before you further 19 touched base with Mr. Harris? 20 A. No. The provisional -- what was that 21 date? Because we were already working on that 22 prior to the show. 23 Q. Okay. The provisional was filed 24 February 29, 2016? 25 A. Right. With our lawyers we were
Page 39 1 I'll let you go, and I know you guys are busy, 2 but I appreciate your time. Basically it. 3 Q. When did you connect with Mr. Harris 4 after that, how soon after? 5 A. To be honest with you, it scared me, 6 man. It scared me and my brother, you know; you 7 always hear those big fears. We had multiple 8 people come up. So it didn't help the situation 9 when you had customers in an industry, I guess, 10 knew more than we did that were basically 11 telling us: Man, I hope you got your patent 12 squared away; hope you got -- I remember to this 13 day. And yes, sir, appreciate it. Goes: Man, 14 somebody's going to steal it, so you better -- 15 so we were scared. Honestly we were scared. 16 And that's when we started talking more with our 17 lawyers to try to protect ourselves before we 18 started a conversation. Not to say they were 19 bad guys in the industry, that's not at all. 20 Vista Outdoors is a very respectable, publicly 21 traded company. We did it the right way. And 22 so once we got our bearings -- because we'd 23 never been through this before. I mean we knew 24 nothing. And so once we got that squared away, 25 I gave him a call. He called right back, and he	Page 41 1 already -- had that in the works. Just because 2 it wasn't filed, but obviously I don't think I 3 got back from the show until the 20th, so I 4 don't think we wrote a patent in nine days. We 5 were already talking to my lawyers about it. So 6 it's not like we have to protect ourself now, if 7 that's what you're asking. 8 Q. No, no, no. It's a little bit -- my 9 question is a little bit different. I'm going 10 back to when did you reconnect with Mr. Harris? 11 I thought I heard you say it would have been 12 after you got your patent filed? 13 A. No. I never said that. I said we -- I 14 had to make sure -- I didn't know what -- I 15 didn't know about negotiations, what we had to 16 do prior, how could we protect ourself. I said 17 nothing about trying to file a provisional 18 application or anything like that. What I said 19 was we were scared that -- I had nothing -- you 20 know, first time around, man. I'm a homicide 21 detective; my brother is a firefighter. I mean 22 I just got off from a big shift and I drove 23 straight through that night with my 24 father-in-law. My brother was still working; he 25 flew in. So it wasn't -- you know, you're

Page 42 1 talking to a major corporation like your client, 2 a major corporation, you know, you want to make 3 sure -- and like I said, it did scare us because 4 all the customers were kind of trying to give us 5 the heads-up. So we went in blind; it was 6 quick, you know, to that show. 7 Q. Okay. Just using the provisional 8 application date of February 29 as the 9 framework, when you reconnected with Primos 10 about using your mesh in the Double Bull blind, 11 was it after February 29, 2016? 12 A. Yes. 13 Q. Okay. I should have mentioned this at 14 the outset, Chris, but if you need to take a 15 break at any time -- I just ask you finish a 16 question -- but please let me know, we can take 17 a break. I tend to like to go an hour, a little 18 bit more than an hour. 19 A. You say you're still waiting for an 20 answer to a question? Is that what you said? 21 Q. No, I just said -- 22 A. No, I'm fine. 23 Q. -- I don't like to break the question 24 and the answer. That's all. 25 A. I'm good.	Page 44 1 improve the windows, maybe stuff like that. 2 Q. Anything else? I'm sorry. Anything 3 else? 4 A. No. I don't believe so. 5 Q. And when did you first become familiar 6 with the structural aspects of a pop-up blind? 7 Would that have been in connection with your 8 collaboration with Primos? 9 A. I think I knew about them prior to 10 that. I mean I probably saw them at NWTF and, 11 you know, that's probably about it. I can't 12 tell you, maybe a hunting show, you know. I 13 can't speculate the first exact moment I put my 14 eyes on a pop-up blind. To me I didn't know 15 what they were called. It looked like a tent to 16 me is basically what it is, right? 17 Q. Yeah. When Mr. Harris approached you 18 in 2016, did he explicitly suggest using your 19 mesh material in a Double Bull pop-up blind? 20 A. Yes. 21 Q. Prior to that, had you or your brother 22 contemplated using your material in a pop-up 23 blind? 24 A. Prior to conversations with Jason? 25 Yes.
Page 43 1 Q. Okay. Good. In Paragraph 336 you say: 2 RCHB and Primos began developing products; 3 namely hunting blinds, and a particular pop-up 4 hunting blind that incorporated the RCHB novel 5 mesh material. Do you see that? 6 A. Yes. 7 Q. Did Rugged Cross provide any input on 8 the structural aspects of the pop-up blind being 9 developed with Primos? 10 MR. WOLTER: Objection. Lack of foundation. 11 BY MR. ABDELNOUR: 12 Q. You can answer. 13 A. No. I mean the structure was 14 already -- it was a Double Bull. I believe they 15 have a patent on their structure already, their 16 hubs and stuff. So I had nothing to do with 17 that dealing with the structure -- 18 Q. What -- and what did Rugged Cross 19 contribute to the development of the product 20 that I understand became the surround view 21 blinds? 22 A. We just talked about different -- 23 obviously our material, show them, you know, the 24 process, what material to use, the specs of that 25 material. And then just certain things, how to	Page 45 1 Q. Correct. And when you say you had 2 contemplated using your material in a pop-up 3 blind, what -- can you be more specific? What 4 did that entail? 5 A. Having conversations with folks in the 6 industry when we showed them. 7 Q. At the trade show or before the trade 8 show? 9 A. The trade show. 10 Q. So fair to say that the first 11 contemplation of using your mesh material in the 12 pop-up hunting blind would have been at the 2016 13 NWTF trade show based on conversations with 14 folks in the industry? 15 MR. WOLTER: Objection. Beyond the scope. 16 BY MR. ABDELNOUR: 17 Q. You can answer. 18 A. It was prior to that. 19 Q. Can you be more specific? 20 A. Again, I built this blind for my son. 21 As soon as we saw how unbelievable the view was, 22 that there was no blind spots, I knew not one 23 person in the hunting industry, not one -- the 24 only person -- I take that back. The only 25 person we knew was a family friend my brother

Page 46 1 went to high school with who was a trainer, 2 physical trainer. He was on a show called Back 3 Woods Life. He was one of my brother's good 4 friends growing up since they were like six 5 years old playing baseball. We called Davy and 6 asked if we could show him something. And I 7 believe he was out of town, so we took pictures 8 and then we asked a guy in the industry, Michael 9 Lee of Back Woods Life, that has over, I 10 believe, now he's been in the hunting show for 11 25-plus years, who was with Real Tree at the 12 time. And I asked him: I got something to show 13 you, and I don't know. I believe it's something 14 that's different, something that -- never seen. 15 It's going to fix a lot of problems. And I 16 asked him if we could come up and show him a 17 hunting blind. I knew he was only three hours 18 away. So me and my brother took time off of 19 work; that same blind, we trailered it up to his 20 farm in Valdosta. And as soon as him and his 21 dad -- his dad is around 70 years old, and they 22 had -- probably 60 at the time -- they have a 23 family farm that's been in their family for over 24 100 years. And as soon as he saw that blind he 25 said: Man, I'm going to tell you something	Page 48 1 percent of the market share right now. 2 Q. So to -- I just want to pin down some 3 of the finer details of what you just said. You 4 said he mentioned pop-up blinds and -- 5 A. He said it would be awesome if it was 6 in a pop-up blind. 7 Q. And who is the he? 8 A. Michael Lee. 9 Q. This is your friend's dad? 10 A. No. They're both Mike Lee. That's 11 senior and junior. But I believe both of them 12 say, but -- both of them said that. But junior 13 was the one that said it first. Senior said 14 he's had multiple blinds out there. Every 15 company -- because they were sponsored by almost 16 every company out there. They've had pop-up 17 blinds, they've had house blinds out there. And 18 it's the most revolutionary thing that he's seen 19 out there. And he kept praising it, and that's 20 when me and my brother had the conversation 21 about, you know, what to do. 22 Q. If somebody sees your one-way mesh in 23 one type of blind, would you agree with me 24 that -- and they were familiar with blinds, that 25 it would be obvious to them that you should be
Page 47 1 right now. There's a lot of blinds come like 2 this, and I've never, ever seen anything like 3 that. Michael Lee, which is now -- he basically 4 told me: Listen, you need to contact Real Tree 5 and you need to get a patent attorney and you 6 need to protect this idea. Because this might 7 be one of the best ideas I've ever seen. I 8 said: Are you sure? 9 Yep. 10 And that's when we got going. That's the 11 story. And that's why -- and that -- and that 12 thing you asked, you asked what kind of -- well, 13 Real Tree was so big, we got permission to use 14 the Real Tree pattern. Real Tree felt so 15 strongly about it, never seen anything like it; 16 we were able to get a license agreement, and I 17 don't even know if it was signed yet, but they 18 allowed us to use their incentive to files to 19 put a better image on that blind to show it 2016 20 NMTF. So that's -- and then he's the one that 21 said: Man, pop-up blinds, this thing would be 22 unbelievable. This thing would take over the 23 industry which, as we all know, it has. It's 24 took the blackout and the old-school blinds 25 totally out of business. They might have 10	Page 49 1 using it in pretty much any other type of 2 hunting blind, because it's -- works so well. 3 MR. WOLTER: Objection. 4 THE WITNESS: That's speculation. That's -- 5 MR. WOLTER: Objection. Lack of foundation. 6 Beyond the scope. 7 THE WITNESS: If -- so you want me to 8 speculate if somebody told -- asked me that? 9 BY MR. ABDELNOUR: 10 Q. I just wanted your opinion. 11 A. My opinion, I mean I don't understand 12 what you're asking. I really don't. 13 Q. No. And that's fair. And sometimes 14 I -- sometimes I ask questions that aren't 15 great, which is why I'll fix them. 16 In your opinion, would you agree that 17 somebody who's a consumer of hunting blinds, if 18 they saw your one-way viewing mesh and one type 19 of blind, that they would want to use it in any 20 other type of blind because it's so good? 21 A. Yeah. I guess that's why it's so 22 popular. I mean I think I know what you're 23 getting at. 24 Q. Okay. I -- 25 A. I mean, yeah.

Page 50 1 Q. Chris, you have a declaration in front 2 of you. Let's go back to it. And I'm going to 3 turn to a new topic. I would suggest we take a 4 quick break. 5 (Short break taken.) 6 BY MR. ABDELNOUR: 7 Q. Okay. Chris, welcome back. We're on 8 the record. So, Chris, if we're -- turn to Page 9 13 of your declaration, you see in the middle of 10 the page there's a heading that says Secondary 11 Considerations Industry Praise? 12 A. You said 30? 13 Q. Page 13, 1-3. 14 A. I'm sorry. I thought you said 15 paragraph. Yes, sir. 16 Q. So you've got a heading that says 17 Secondary Considerations Industry Praise. 18 What's your understanding of secondary -- what 19 secondary considerations mean to you? 20 A. I mean, again, I'm not a patent 21 attorney or any of that stuff, right. So 22 secondary considerations, what I guess other 23 standards set that -- I guess, I don't know, 24 it's -- I guess another set of standards that 25 would apply to a patent, I guess you would say.	Page 52 1 A. I thought there was a fourth or fifth. 2 How many -- can I ask -- I mean can you verify 3 something? How many secondary consideration 4 categories are there that the U.S. Patent Office 5 deems appropriate? 6 Q. Yeah. There's certainly more than 7 three. But -- 8 A. I believe we possibly had all of them, 9 but I might be wrong. I don't know. 10 Q. Well, now you're familiar with the 11 papers, for example, that -- 12 A. Yeah. I -- 13 Q. So but I want to -- I just want to 14 focus on your testimony and your declaration. 15 Which categories of secondary considerations did 16 you testify regarding? 17 A. One was innovation, right? Long-felt 18 need, industry praise, copying. That's all 19 that's listed. 20 Q. Where do you testify about long-felt 21 need? 22 A. Bear with me. I guess you're saying we 23 only put three in? That's fine. Again, I -- 24 you know, I guess you said there's three; so if 25 there's three in there, there's three, I guess,
Page 51 1 I don't -- does that make sense? I mean -- 2 Q. Okay. So let me share my screen again. 3 We can all look at the declaration together. 4 Okay. Do you see the screen? 5 A. Mm-hmm. 6 Q. So, again, if I flip through to 7 Page 13, you've got a heading that says 8 Secondary Considerations Industry Praise. Do 9 you see that one? 10 A. Correct. 11 Q. If I flip ahead to Page 20, you have a 12 heading says Secondary Considerations Topping by 13 Others Including the Petitioner DBR. Do you see 14 that? 15 A. Mm-hmm. Bear with me. I'll try to get 16 there. 17 Q. And then at Page 27 you have a section 18 that says RCHB Licensing. Do you see that? 19 A. Yep. 20 Q. Okay. So it's not a trick question. I 21 just want to confirm those three categories that 22 we read are the three and only three topics on 23 which you're discussing secondary 24 considerations: And that's industry praise, 25 copying, and licensing, correct?	Page 53 1 categories. But I don't know if I clearly have 2 them marked on here. So if you want to point 3 those out, it would be fine. 4 Q. Right. And that's why I tried to walk 5 you through the headings. I saw headings for 6 industry praise, copying, and licensing. Those 7 are clearly in there because I -- 8 A. I got you. I got you now. I'm sorry. 9 I was -- 10 Q. If there are any -- 11 A. It's a long declaration, man, so I'm 12 trying to get the papers shuffled correctly. 13 Q. Take your time. My question is are 14 there any others besides the three I just 15 mentioned? 16 A. No, not in this declaration. 17 Q. Okay. You testify in paragraph -- 18 Paragraphs 13 and 15 of your declaration that 19 the see-through feature was unexpected. 20 A. Correct. 21 Q. Correct? And the unexpectedness was 22 your subjective perspective, correct? 23 A. In my perspective, like in my opinion? 24 Q. Correct. 25 A. I don't know if it's in an opinion.

Page 54 1 It's a fact. I never thought I would be able to 2 see through this thing. 3 Q. Right. But my point is it was 4 unexpected to you, correct? 5 A. Yeah, correct. And my brother, right. 6 But I don't want to speculate what he would say, 7 so. 8 Q. Right. And as you wrote this in 9 Paragraphs 13 and 15 of your declaration, you're 10 providing -- your testimony that it was 11 unexpected to you and not to anybody else, 12 correct? 13 A. Correct. 14 Q. All right. You testified in your 15 declaration that you used a banner mesh that you 16 purchased in 2015, and you achieved these 17 unexpected results, correct? 18 A. Correct. 19 Q. And the success is due to the ability 20 of somebody on the inside of a tent to be able 21 to see out while somebody on the outside of a 22 tent cannot see in, correct? 23 A. If that's what you want to say, I 24 guess. 25 Q. How would you -- I don't want to put	Page 56 1 look at trees and the environment. It creates 2 all kinds of things, and no blind spots. It 3 takes all the pressure off a parent trying to 4 take their kid hunting. And that's why we were 5 adamant trying to get it out. If there was one 6 thing that came of this, it was that. 7 Q. You would agree with me -- Strike that. 8 If you use different types of mesh, you 9 get different results for the one-way viewing. 10 A. That's pure speculation. There's so 11 many types. There's premethod -- I can't 12 even -- there's nowhere close I can even come 13 close to answering that question right there. 14 Q. Let me try it a different way. Does 15 your invention require a specific type of mesh 16 for you to be able to achieve the one-way 17 viewing feature that was the subject of the 18 various praise that you describe in your 19 declaration? 20 A. What do you mean, like a specific 21 brand? I mean you've got to be more specific. 22 I'm not trying to -- because I don't really 23 understand what you're asking. 24 Q. Let me back up. Are you familiar with 25 different types of mesh?
Page 55 1 words in your mouth, but I'm just trying to 2 characterize the one-way viewing feature is the 3 key, correct? 4 A. Not the only key, but it's one key. 5 There's many different variables that take 6 place. 7 Q. No. And that's fine. What are the 8 other variables? 9 A. Well, one is you have your kids, that 10 you're allowed to take a younger generation of 11 hunters to hunt with you, and you don't have to 12 worry about having the stress for them to move 13 around with only having an open window, them 14 making noise. Also you have them able to just 15 sit right where they're at and be able to see 16 365 degrees all around them, and they're not 17 looking back or scared thinking -- you know, a 18 kid is usually scared of maybe a backdoor or 19 something, you know, or something -- hope 20 something doesn't run from the back of us. It 21 puts all those fears in place on that child, and 22 it also gives a great experience for the 23 grandfather, uncle, dad to take those kids out 24 and not have to yell to stay seated, look; you 25 know, they're not bothered. They're able to	Page 57 1 A. Yeah. 2 Q. And how do different types of mesh 3 differ? What are the different variables? 4 A. Well, it's all how you -- first you got 5 to look at how -- what is mesh material? 6 Q. What is mesh material? 7 A. Well, mesh material to me would be 8 openings, same size, and the same group of the 9 material of that would create an air flow; a 10 systematic -- whether it's punched-in material, 11 whether it's weave, or whether it's unwoven, 12 it's mesh, mesh material. That's what I see 13 mesh material as. That's what the definition 14 is. 15 Q. Different mesh material can have 16 different-sized holes, correct? 17 A. I didn't say different sized holes, no, 18 no, sir. Same size holes in a systemic -- the 19 same, the same pattern. That's what I -- not 20 different size holes. 21 Q. Let me try to be -- let me try to 22 clarify. One type of mesh can have one type 23 of -- one size hole and a different type of mesh 24 can have a different size hole, correct? 25 A. Well, yeah. There's different type

Page 58 1 mesh. There's porthole mesh which is a lot 2 bigger, there's jersey mesh which is used for 3 basketball jersey. And I'm glad you brought 4 that up, because that's what I was trying to get 5 at. There is different style meshes out there. 6 There's basketball jersey mesh, there's football 7 jersey mesh. It's the hole size and everything 8 else of that. 9 Q. Would your invention work with a 10 porthole mesh? 11 A. No. 12 Q. Why not? 13 A. It's too flimsy. A porthole mesh -- 14 porthole mesh is something like the military 15 uses to put -- to cover tanks with the big 16 openings. And the reason it's porthole is it 17 uses where -- it's for to put like limbs and 18 stuff in there to create a 3D effect. That's 19 what the military uses to cover like tanks in 20 the desert and stuff and what we used to use in 21 Vietnam in the jungles. 22 Q. What other types of mesh would not work 23 with your invention? 24 A. Jersey mesh, there's all -- you know, I 25 can't clarify them all, because some can't be	Page 60 1 and people have said it, can't explain it. It 2 was a blessing. That's all I can tell you. It 3 was a blessing, and I can't -- probably one of 4 the craziest things, and that's all I can say. 5 I've been -- we've been saying that since 2015, 6 and that's what makes this story unique. It 7 basically goes -- it was a godsend, that's all I 8 can tell you, and that's why Rugged Cross -- 9 that's why I chose the name, and, you know, it's 10 all I can tell you. 11 Q. And bear with me, but I take it because 12 you haven't tried any other type of material, 13 that you don't have personal knowledge whether 14 using another type of mesh material would work 15 to give the same one-way viewing effect, 16 correct? 17 A. All the ones that I've seen is a mesh. 18 Every single one, they have the same diagonal 19 yarn, they have the same effect; might be a 20 thinner one. That's just it. It's the exact 21 same systematic pattern on every one of them. 22 Q. What are the character -- how would you 23 characterize the features of that mesh that make 24 it work? 25 A. It's the hole size. So it would work,
Page 59 1 printed, and I really don't know. Again, we're 2 going way outside of my scope of the 3 declaration. 4 Q. Do you agree that a mesh with large 5 openings could lead to uneven coverage and a 6 less-defined pattern? 7 A. It depends on what kind of context 8 that's in. 9 Q. In the context of hunting -- 10 A. I don't -- I don't really understand 11 the question. 12 Q. Do you -- Would you agree that a mesh 13 that had holes that were too small would not 14 work with your invention? 15 A. I've never tried it. 16 Q. How many different -- so other than the 17 banner mesh that you used in 2015 and 2016, how 18 many other types of mesh have you tried to use 19 with your invention? 20 A. Just one. 21 Q. Just the one. That's the only one? 22 A. Yes, sir. 23 Q. Did you ever experiment with any other 24 types of materials or mesh? 25 A. No. That's why we said in our story,	Page 61 1 but it gives different view; the best view is 2 our material, but if you go thinner, cheaper, 3 which is -- seems to be a lot of -- I guess the 4 industry or somebody would call them the 5 knockoffs, you know, try to build it cheaper, 6 you know, I guess for profits, you don't get the 7 same view. 8 Q. It doesn't work as well? 9 A. I mean it still has the same purpose, 10 but it doesn't work as well. And that's my 11 opinion. I don't know if somebody -- what a 12 customer would not know because they've never 13 seen a Double Bull or a Millennium or any of 14 those types. 15 Q. In Paragraph 10 of your declaration you 16 use the word scrim, scrim banner mesh. What is 17 scrim banner mesh? 18 A. It's just a word the industry uses; 19 scrim banner mesh, it's the same thing, 20 basically the same thing. Scrim banner mesh, 21 it's just the industry's lingo. It's like if 22 you say truck or pickup. Same thing, if that 23 makes sense. 24 Q. Okay. I understand. Does the success 25 of the one-way viewing feature depend on the

Page 62 1 type of ink that you use? 2 A. I don't know if it's assessed, but I 3 know durability, durability. 4 Q. But does the one-way viewing feature 5 depend on the type of ink used? In other words, 6 if you use different types of ink, would you get 7 different -- would you achieve different results 8 of one-way viewing? 9 A. I am not -- I wouldn't -- I'm not an 10 expert in this, so it seems the ones that are 11 using like a transfer apply is using a cheaper 12 material. But I don't -- I'm not an expert, so 13 I can't tell you is it the ink or the cheaper 14 material. I don't know. That's something 15 that's beyond what I can testify. I really 16 don't know. 17 Q. Does the type of material for the mesh 18 have an impact on the success of the one-way 19 viewing feature? 20 MR. WOLTER: Again, objection. Beyond the 21 scope. 22 THE WITNESS: My opinion, no. You look at 23 companies that have used it, it is -- now it's 24 kind of -- back when we released it, it was new. 25 Now it's who wants to put the amount of	Page 64 1 A. Yes, sir. 2 Q. This is Exhibit A to your declaration. 3 I guess it's Exhibit 2032-A, correct? 4 A. Mm-hmm. 5 Q. Okay. Now, this is the technical data 6 sheet for Ultra Mesh Plus, correct? 7 A. Yes. 8 Q. And this is the commercial mesh that 9 you purchased for use with your invention, 10 right? 11 A. Yes. 12 Q. And this is manufactured by -- well, is 13 this manufactured by a company called Ultraflex 14 Systems Incorporated? 15 A. Yes. 16 Q. And this is a spec sheet for the banner 17 mesh that you used, right? 18 A. Yes. 19 Q. There is a table here in the middle of 20 the exhibit with a list of material details. Do 21 you see that? 22 A. Correct. 23 Q. And below that is a list of 24 characteristics. Do you see those? 25 A. Yes.
Page 63 1 marketing money behind it to make it thrive. 2 Prime example would be -- and if we're going to 3 go there, it's Rhino. Rhino had a full page and 4 one of the biggest trade shows, ATA, about their 5 new product, revolutionary 180 see-through mesh 6 that was on the media guide to all the dealers. 7 So obviously they paid a lot of money; all the 8 lanyards had Rhino blinds on them, and that's 9 when, you know, they basically took over the 10 industry with their -- so it's all about -- 11 going back to your question, I don't think 12 it's -- that's why it's all about who markets it 13 the best right now. It was not like that in -- 14 when we first came out with it, because it was 15 new. Everybody loved it. That's why the 16 copiers came, because they had to have it. 17 BY MR. ABDELNOUR: 18 Q. And in Paragraph 10 of your 19 declaration, you refer to Exhibit A, which is a 20 spec sheet for the mesh material that you used. 21 A. Correct. 22 Q. Do you have Exhibit A in front of you? 23 A. I'm sorry. I don't have any exhibits. 24 Q. I'm going to pull it up for you on the 25 screen. Okay. Do you see that?	Page 65 1 Q. And that is a list of characteristics 2 of the mesh material that you purchased, right? 3 A. Yes, in 2015. 4 Q. And it's the same mesh that you're 5 using today, correct? 6 A. No. 7 Q. You're using a different mesh today? 8 A. Well, my manufacturers, they're not 9 using Ultraflex. Primos is the only one that's 10 using for a fact Ultraflex. But like Millennium 11 and them, I don't know if they're using a 12 comparable, you know, mesh. We don't hold them 13 to that. 14 Q. Let's go back to the material details 15 so we can at least agree this is the material 16 that Primos is using and that you use with your 17 2015 invention, right? 18 A. Correct. 19 Q. All right. The characteristics include 20 support cloth, correct, just reading down this 21 chart? Do you see that? 22 A. The PVC backer that peels off after the 23 printing process. You got it -- you have it -- 24 I can't see the whole thing. Is that what 25 you're looking at up there? You've got it like

Page 66 1 zoomed in, sorry. I don't know if it's me or 2 you. 3 Q. I just zoomed out. 4 A. There you go. 5 Q. Can you see everything? I'm looking at 6 this table in the middle of the page. 7 A. Oh, okay. 8 Q. And these are characteristics of the 9 mesh material, right, in the first column under 10 characteristics. Do you see those? 11 A. Yes. 12 Q. All right. There are 11 different 13 characteristics listed there. Correct? 14 A. Correct. 15 Q. It includes support cloth, right? 16 A. I don't even know what that means, the 17 support cloth. Again, I -- these 18 characteristics -- and I don't even -- I don't 19 even know what like the 14-by-14 -- do you 20 understand what I'm saying? So I don't know 21 what you we're getting at here. I'm not an 22 engineer -- honestly, I'm not an engineer. I 23 just purchased this mesh material. I know what 24 mesh works. There's only a couple of 25 manufacturers that make the mesh material, I	Page 68 1 lifetime warranty. Because it provides the best 2 view, and that's why it was such a hit, and it 3 took us a year and a half after that first show 4 to supply -- to fill all the orders. A year and 5 a half. 6 BY MR. ABDELNOUR: 7 Q. Under the listing of characteristics in 8 Exhibit A, there's one that says air 9 permeability, 200 pascal. Do you see that? 10 A. 200 -- yes. 11 Q. Do you know what that means? 12 A. No. 13 Q. In the description of the product in 14 the first paragraph in Exhibit A, it refers to 15 this material as ideal for building stadiums and 16 fence wraps. Do you see that? 17 A. Yes. 18 Q. Have you seen this material used in 19 buildings, stadiums, and fence wraps? 20 A. Again, that's how I felt it -- coaching 21 my son, we had outfield signs that had local 22 businesses that were sponsoring the community 23 little league, and that's what they use to put 24 them out, you know, on the side in the outfield 25 for sponsors. I saw it on a fence.
Page 67 1 know that; there's only like three or four of 2 them, they're out of China, and they make 3 basically -- same where Ultraflex gets it from, 4 they make the same standards whether it's 5 lighter, whatever, but it's basically the same 6 mesh. That's all I know. 7 Q. Okay. Would you agree with me that if 8 you changed the characteristics of the mesh 9 material as listed in this data sheet, if you 10 had a different mesh with different 11 characteristics, you might get a different 12 result for one-way viewing? 13 A. No. 14 MR. WOLTER: Objection. Again, beyond scope 15 and lack of foundation. 16 THE WITNESS: No. Because I -- and I have to 17 answer, right? So, no, because I have different 18 licensees using different types of mesh. If 19 it's camo on one side, black on the other, and 20 it's a mesh material, that's well defined in the 21 dictionary what mesh is. So -- but I can tell 22 you that I know Primos uses this right here 23 because they wanted the best viewing, and that's 24 what worked, and that's what holds up, and 25 that's why there's a little bit more money and a	Page 69 1 Q. Okay. And the spec sheet further talks 2 about how Ultra Mesh Plus may be printed on one 3 side and is compatible for use with solvent, 4 eco-solvent, UV, latex, and screen printers 5 using mesh kits. Do you see that? 6 A. Correct. 7 Q. So -- and you agree with me that this 8 commercial banner mesh product was being sold 9 for use to be printed with a pattern on one 10 side, correct? 11 MR. WOLTER: I'll object. Lack of 12 foundation. 13 THE WITNESS: A pattern, I don't know the 14 printing definition, but it was basically that 15 product as I learned from Ultraflex which is 16 right down the street, moved from New Jersey to 17 Tampa, Florida, their headquarters. I have 18 talked to them extensively about this material. 19 This material was designed to put on skyscrapers 20 that they're building in New York at the time 21 because it had air flow, it wouldn't create a 22 parachute effect. So it was safe -- it was a 23 safety feature for the citizens or community on 24 the ground, but it was basically used to put 25 like, hey, so-and-so construction is building

Page 70 1 this or "coming soon" this. And it was built, 2 this material was used to hang on structures 3 like that to basically say what they were doing 4 or for advertising. They're on -- stadiums use 5 them now, football games. That's what -- you 6 know, you have the iconic picture of your 7 favorite player, that's scrim mesh or banner 8 mesh. Because it will not act like a parachute 9 in the elements that's up that high. 10 So a pattern, if you're trying to say it 11 says a pattern and you're -- and camo, I don't 12 know. 13 BY MR. ABDELNOUR: 14 Q. Let me ask it simply: You agree that 15 this banner mesh is being sold and promoted for 16 use with one side to be printed with ink, 17 correct? 18 A. One side, yes. 19 Q. Do you have any knowledge whether this 20 banner mesh printed with ink would provide a 21 one-way viewing feature? 22 MR. WOLTER: Again, objection. Beyond the 23 scope. 24 THE WITNESS: Can you repeat the question? 25 MR. ABDELNOUR: Can you read the question	Page 72 1 Q. Turn to Paragraph 41 of your 2 declaration. In the middle of the paragraph you 3 state that you provided information on the ink 4 used and printing methods used to make the mesh 5 material. Do you see that? 6 A. Yes. Sorry. Did you hear me? 7 Q. Yes. Do you agree that the types of 8 inks used is pertinent to the one-way viewing 9 feature? 10 MR. WOLTER: Again, objection. Lack of 11 foundation. Beyond the scope. 12 BY MR. ABDELNOUR: 13 Q. You can answer the question. Is it 14 pertinent? Are you saying like you have to use 15 eco-solvent? Is that what you're saying? 16 A. No. 17 Q. Let me ask it differently. Would you 18 agree that the type of ink used will have an 19 impact on one-way viewing? 20 A. No. 21 Q. Would you agree that the printing 22 methods used would have an impact on one-way 23 viewing? 24 A. The end -- I'm -- was that the same 25 question, but now you're asking what the impact
Page 71 1 back, Laura? 2 THE WITNESS: Sorry, Laura. 3 THE COURT REPORTER: No problem. That's what 4 I'm here for. 5 (Record read back.) 6 THE WITNESS: If printed on -- if it was 7 printed on one side, if you're asking me now -- 8 well, obviously we know now it does, right? 9 But, again, when we first developed this in 10 2015, I wasn't trying to make a see-through 11 blind, if that makes sense. But if you print 12 one way and it bleeds through, you're not going 13 to get a good view at all. You're not even 14 going to get close to a view. You're going to 15 get splotches. 16 Q. What if it doesn't bleed through? 17 A. It's going to bleed through; has to 18 bleed through. That's why they had the peel-off 19 after the 2DC backer (ph.). it bleeds through, 20 it's porous, it's air flow. So if air flow can 21 go through it, liquid can go through it. 22 Q. Do you have knowledge one way or the 23 other of using banner mesh for one-way viewing 24 prior to your invention? 25 A. No.	Page 73 1 was on -- I'm sorry. Repeat that. 2 Q. It was a different question. 3 MR. ABDELNOUR: Laura, would you read that 4 question back, please. 5 (Record read back.) 6 THE WITNESS: It -- that's an opinion 7 question. I guess if someone like me knows what 8 the best ink to use, I would say yes. Due to 9 the customer, I don't know, because now, you 10 know, eco-solvent, there's new like technology 11 out there. You know, there's HP latex and seems 12 to be going -- back in the day the eco-solvent, 13 we would have to print it and you would have to 14 let it dry for several hours, which is another 15 reason nobody ever did what we did for the 16 see-through when we found out it worked with the 17 spray paint, because the cost and the time that 18 it took was unbelievable. That eco-solvent did 19 not have a heater, did not dry it. So you 20 literally had to print one side, take off the 21 backer, right; and once it was dried four, five, 22 six hours, depending what you printed, you had 23 to let it air dry, and then you had to roll it 24 up, and the roll had to be so tight that the 25 printer would still recognize that it was a

Page 74 1 clean roll. And then you had to -- you know, 2 backwards, right? And then you'd have to print 3 it back and let that dry for another five or six 4 hours. So you're talking about printing time 5 for one blind back then would take 14 hours. 6 Does that make sense? So now you have HP latex, 7 which the heater already dries it once it comes 8 off the rolls, and then you flip the roll. And 9 it also has an ink collector where you don't 10 have to worry about the ink splotches. So if 11 you're asking me do I think the printing process 12 plays a critical role on the one side? Yes, 13 with me knowing, because that's what I do. But 14 to the customer what -- does it make a 15 difference? I don't know. It depends on their 16 experience of had they ever been in just a, say, 17 a Rhino hunting blind. Have they been in a 18 Primos? Have they been in a Tidewe? It just 19 depends. But in the same, no matter what mesh, 20 if it's a dark color on the back side, camo, 21 it's going to provide the same effect. Whether 22 it's good, bad, or indifferent. It's kind of 23 like buying a Cadillac, but -- you got Cadillac 24 brands out there, you have Fords, you know, you 25 have Toyotas. But in the same, they still	Page 76 1 answer -- I can't answer your question 2 because -- 3 Q. That's okay. Let me ask a different 4 question. Is the fact that the fabric is woven 5 or overlain something that contributes to the 6 one-way viewing feature? 7 MR. WOLTER: Objection. Same objection. 8 Beyond the scope and lack of foundation. 9 BY MR. ABDELNOUR: 10 Q. You can answer. 11 A. No. 12 Q. Does the fact that holes are equally 13 spaced contribute to the one-way viewing 14 feature? 15 A. Small or right size. Yeah, I mean you 16 don't want them too big. If you've got a whole 17 six inches, it's not going to give you one-way 18 see-through, right? That's kind of, you know -- 19 I don't have to be an expert in that, right? So 20 yeah, I guess if you're saying -- yeah, it has 21 to be, you know, small holes. Again, you've got 22 the same thing as you brought back the screen. 23 It has the same size holes, but those holes are 24 a lot bigger, but it's thinner. You see right 25 through it. You can't print on it. You can
Page 75 1 drive, function the same thing, they still have 2 an engine. 3 Q. The banner scrim mesh that you used was 4 made of polyester fabric that is woven or 5 overlain with equally spaced holes, correct? 6 MR. WOLTER: Objection. Again, beyond the 7 scope. 8 BY MR. ABDELNOUR: 9 Q. You can answer. 10 A. I'm sorry. I said correct before he 11 objected. 12 Q. It's okay. Would you agree that the 13 type of fabric here being polyester has an 14 impact on the one-way viewing feature? 15 A. The fabric? I don't -- I don't -- I 16 don't really know like the all one-way 17 see-through mesh. I don't know what gives it -- 18 like I said before, I don't know if it's the 19 light -- I'm not an expert, so I don't know if 20 it's the lightness of the weight, if it's the 21 printing process, if it's the manufacture, 22 different manufacturers of the mesh, what they 23 use, what they say they use, what they put in; 24 they don't tell you what they put in. I don't 25 know. I really don't know. I'm sorry. I can't	Page 77 1 print one side of it, and you can't really even 2 make it out, what it is. 3 Q. Are you familiar with the '535 patent 4 claims? 5 A. Patent claims. I don't have them in 6 front of me. 7 Q. Are you familiar with them generally? 8 A. To a certain point. I mean we have 9 four patents, so I can't tell you, you know, 10 which one, you know. 11 Q. Would you agree with me that the Austin 12 blind is not covered by a claim that recites a 13 pop-up blind? 14 A. I would not agree with you. Is that -- 15 yeah. 16 Q. Would you -- you would agree with me 17 the Austin blind was not a pop-up blind, 18 correct? 19 A. It's not a pop-up blind. 20 Q. In your declaration you describe 21 industry praise of the Austin blind, right? 22 A. Yes. 23 Q. And that's from the 2016 timeframe, 24 Correct? 25 A. I believe we have 2016, and then I

Page 78 1 believe we have up until, I don't know -- can 2 you please tell me where industry praise starts 3 again? I've got innovation. I'm just trying to 4 find that so we're on the same page, save some 5 time. 6 Q. It's on Page 13. Let's do it this way, 7 because I -- in Paragraph 27 you refer to 8 reviews of the Austin blind. Right? That's 9 from the 2016 timeframe. 10 A. Right. 11 Q. Okay. And you've got several 12 paragraphs that describe what you refer to as 13 praise of the Austin blind. Fair? 14 A. Yes. 15 Q. All right. That includes Paragraph 30 16 where you've got another article, Exhibit F, 17 right? 18 A. Yes. 19 Q. And then there's a second category of 20 praise around the introduction of the Primos 21 surround-view blinds, correct? 22 A. Correct. 23 Q. For example, starting at Paragraph 42? 24 A. Yeah. As far as articles. 25 Q. Yes.	Page 80 1 videos. But I can't list all of those due to 2 the time, and -- you know, we'd be here all day 3 or all week. 4 Q. Would you agree with me that the 5 feature of the Austin that received praise was 6 the one-way viewing mesh? 7 A. Yeah. 8 Q. Anything else? 9 A. No. 10 Q. Would you agree with me that the 11 industry praise surround -- the surround-view 12 Primos pop-up blind was focused on the one-way 13 viewing mesh? 14 A. Yes. 15 Q. Anything else? 16 A. No. 17 Q. Page 21 of your declaration, you've got 18 a section entitled petitioners -- I'm sorry. 19 Let me start over. At Page 20 of your 20 declaration you've got a section on copying, 21 correct? 22 A. Yes. 23 Q. Why don't you turn there. 24 A. I'm there. 25 Q. And in this section you've listed
Page 79 1 A. Yes. I'm just going through these 2 because there's some that aren't articles, so 3 that's what I'm trying to establish here. 4 Q. And I'm just trying to get the 5 landscape. Is it fair for us to characterize 6 your testimony as two buckets, one dealing with 7 the Austin in 2016 and the second dealing with 8 the surround view in 2018? 9 A. I don't know if -- I mean it's still 10 counting them the same, so I don't know if you 11 want to put them in one bucket or put them in 12 separate buckets. Because we got industry 13 praise by both of them, so -- do you get what 14 I'm saying? So I don't know. I mean if you 15 want to put them in a bucket, we can -- you know 16 what I mean? I don't know. 17 Q. Right. And I'm just trying to -- 18 A. That's just basically for timeline 19 purposes. Obviously I'm going to list the 20 Austin, the industry praise we got, and there's 21 actually more articles. It's just a handful of 22 the articles we got. There's actually a lot 23 more articles about it as well as when the 24 Double Bull, there's over possibly hundreds of 25 articles let alone Facebook posts, YouTube	Page 81 1 various companies that you contend are copying 2 your invention, correct? 3 I'm sorry. Did I miss it? Did you 4 answer? 5 A. Yes. I said correct. I'm sorry. 6 Q. That's okay. And this includes -- I'm 7 going to list them out. This includes GSM 8 Outdoors, correct? 9 A. Correct. 10 Q. Includes Outdoor Products, which is 11 also doing business as DBR, correct? 12 A. Yes. Your client's company, right, 13 DBR? Is that what you said? 14 Q. That's right. That's right. And 15 Barronett, correct? 16 A. Yes. 17 Q. And Tidewe, T-I-D-E-W-E? 18 A. Tidewe. 19 Q. Tidewe, correct? 20 A. Correct. 21 Q. And Buck Bourbon is another one that 22 you contend is copying, correct? 23 A. Correct. They were. 24 Q. For GSM Outdoors, what evidence are you 25 relying upon to allege that they are copying?

Page 82 1 A. What evidence? 2 Q. Yes. 3 A. See-through blind material. They were 4 one of the first, I believe, to come out that 5 very next year using the same material with a 6 diagonal yarn. But they are going on the 7 pretext of a -- of a patent that was filed way 8 after my application was filed in a different 9 category, so that's why they missed -- they 10 missed -- the examiners missed where we filed 11 first, we were the first to file. And they 12 believe that they are covered under that, but it 13 is the -- my same exact technology. It has the 14 same effect; same evenly spaced small holes with 15 a diagonal yarn. And that's it. 16 Q. So your assertion of copying is based 17 on your observation of the product in the 18 market, fair? 19 A. I don't really understand that 20 question. 21 Q. Let me ask it differently. Do you have 22 any direct evidence that GSM copied your 23 patents? 24 A. There is evidence that I believe we 25 have, but I don't think this is a proper venue	Page 84 1 A. Again, I don't have the case in front 2 of me. I don't have any of that stuff in front 3 of me to look at. We have -- I've been going 4 through this since 2015. Like I said before, I 5 wish I wasn't right here right now. Again, I am 6 not -- and I'm not trying to go around the 7 question or anything like that, but, again, I 8 don't have any of that information in front of 9 me, and it -- everything I just listed why I 10 think they're copying, that's just my own basis 11 off the top of my head. If I had that case in 12 front of me, I could read it, and then we could 13 possibly talk about it. 14 Q. Let me -- 15 A. Go ahead. 16 Q. Let me try this. No. Let me try to 17 simplify it, because I don't want this to be a 18 memory test, and I don't want you to go digging 19 around. Is it fair to say that evidence -- any 20 evidence of copying outside of your allegations 21 of infringement and in your observations, not in 22 your declaration. Fair? 23 A. Yeah. There's stuff in there -- I'm 24 not going to talk about another active 25 litigation with another company, you know, I'm
Page 83 1 to discuss what evidence I have for another case 2 that I don't even have it in my declaration that 3 you're asking me. I'm kind of -- makes no sense 4 to talk about my other case that I have with 5 another company. I don't think it's fair for -- 6 Q. Let me try to parse that out. You're 7 asserting infringement of your patents by GSM in 8 another case, correct? 9 A. Yes. But that's after they sued us for 10 tortious interference when Bass Pro Shop pulled 11 all their products off the shelf after they 12 heard our story and looked at our patent, as the 13 same as Walmart and the other brands. So they 14 filed a tortious interference lawsuit -- I think 15 that's the word -- again, I'm not a lawyer. I 16 don't know. And that's when we, I believe, 17 counter-sued them for infringement. But all we 18 did was, you know, state a letter to Bass Pro 19 and Bass Pro ruled in our favor. And to get 20 theirs back on the shelf, they filed a lawsuit 21 on us. 22 Q. So let me ask it this way: Outside of 23 your allegation of infringement of GSM Outdoors, 24 do you have any other basis to contend that they 25 copied?	Page 85 1 just going to -- we're putting in there what we 2 have. I'm not going to -- I'm not going to list 3 what evidence I have under them or all the 4 evidence, right, you know. 5 Q. So -- right. So the answer to my 6 question is yes, it's not in your declaration, 7 true? 8 A. Correct. 9 Q. All right. And that's true for all 10 these companies, correct? 11 MR. WOLTER: I'll object. I mean the 12 declaration speaks for itself. 13 THE WITNESS: Do you want me to read the 14 declaration? We can read it, what I have on 15 them, and what I choose that was appropriate. 16 But, again, it's just like the industry praise. 17 I have -- we have over -- and I actually have a 18 disc of every single article, every single 19 impression. We started keeping that when -- 20 especially when these guys started hitting the 21 shelf, I knew that this was going to be an 22 issue, and I took my legal advice to start 23 backlogging all that, all Facebook comments, you 24 know. And I could list all that stuff, but I 25 only have so much that I can write here in this,

Page 86 1 and that's all I'm saying. So it applies, too, 2 with these other companies that are infringing 3 and willing, not wanting to, I don't know, I 4 would say do the right thing. 5 BY MR. ABDELNOUR: 6 Q. Let me ask a different question. You 7 have open lawsuits asserting this patent against 8 GSM, DBR, and a company called Feradyne, 9 correct? 10 A. Yes. But two of those lawsuits are -- 11 two of those lawsuits are one and the same, 12 because DBR, old Rhino, they stopped responding 13 to our letters and quickly sold their company to 14 Feradyne. And we felt Feradyne didn't know 15 anything about it. So we sent a letter to 16 Feradyne. We didn't get no response, and I 17 don't know if -- 18 Q. Mr. Seaton, let me interrupt. My 19 question was a lot simpler. I'd really like you 20 to focus. 21 A. No, but it's two and the same, though. 22 Q. I'd really ask that you focus on 23 answering my questions. And if you want to 24 testify further about some other topic, your 25 lawyer's going to have an opportunity for	Page 88 1 Q. Okay. 2 MR. WOLTER: Excuse me for interrupting, but 3 are we at a point for breaking for lunch by 4 chance? 5 MR. ABDELNOUR: Let me close out this -- I 6 got about five minutes on this narrow line here, 7 and then we can -- and then we should break for 8 lunch. 9 BY MR. ABDELNOUR: 10 Q. Is it your view, Mr. Seaton, that any 11 hunting blind that incorporates one-way viewing 12 would be infringing upon your patent rights? 13 MR. WOLTER: Objection. Lack of foundation. 14 BY MR. ABDELNOUR: 15 Q. You can answer. 16 A. Again, that is, I feel, an opening 17 question, because it depends on several things; 18 the material, we -- it's not like I see a one -- 19 see-through hunting blind, and we send out a 20 letter. That's not what we do. We make sure. 21 I possibly -- I purchase that blind, I inspect 22 it, I get the blind, and take pictures of it. 23 And then we do other tests that we feel -- until 24 we truly feel that they are infringing, and then 25 we take the appropriate steps. But to say when
Page 87 1 redirect. So I'm trying to keep my questions -- 2 A. I need to explain that your question 3 was like open-ended. You think I have three 4 separate, but two of them are the same. One is 5 your client, and the other one is the company 6 that your client sold. So that's all I'm 7 getting at. 8 Q. I understand. For -- now, you allege 9 infringement against all three of those parties, 10 correct? 11 A. Two. And then after the tortious 12 interference claim, we countersued. So, yes, if 13 you want to say yes. But did I, you know, start 14 the one lawsuit with DSM? No. 15 Q. I understand. And the three parties I 16 mentioned have all taken the position that the 17 patent is invalid, correct? 18 A. They're alleging it is, yes. 19 Q. Okay. 20 MR. WOLTER: Objection. Beyond the scope. 21 BY MR. ABDELNOUR: 22 Q. And three parties I mentioned have all 23 taken the position in litigation of 24 noninfringement, correct? 25 A. Yes. They're alleging, yes.	Page 89 1 somebody says one-way see-through hunting blind 2 or a 360, that's the whole thing with this. You 3 know, looking back, there's been blinds that say 4 360 degree view, 2013, well, they're talking 5 about the window openings, they're not talking 6 about seeing through the material. They're 7 talking about the window openings. So it's kind 8 of like a trick question when -- and it's a 9 play, because the industry always wants to put 10 play words to make it seem like the product is 11 something more than it is. Prime example of, 12 like I just said, the window openings. You've 13 had products, oh, 360 degree view. Well, yeah, 14 they're talking about the windows. When all the 15 windows are open, you can see 360 degrees. So 16 for -- so your question is do I feel -- I look 17 at them. It's not like we -- one-way 18 see-through mesh, we immediately send them a 19 cease and desist and try to threaten them. 20 That's not what we do. We try to work with 21 them. I try to call corporations. And most of 22 them, they value that, and that's why we have 23 great relationships with our licensees. I don't 24 go around threatening people. 25 Q. When you do this, what are you looking

Page 90 1 for? What features are you looking for before 2 you make a determination that there's an 3 infringement? 4 A. Is it mesh material? 5 THE WITNESS: Did you say something, Robert? 6 MR. WOLTER: No, I didn't. 7 BY MR. ABDELNOUR: 8 Q. Go ahead. You can answer. 9 A. Several things: dark coated on the 10 back side of the mesh material, if it's a 11 camouflage pattern, if it has a solid roof, 12 that's another big -- a solid roof. There's 13 been alleged infringers saying, well, it's not 14 interwoven. Why don't you send it off? And it 15 is. Experts say it is. So it just depends on 16 what it is and what's it called. Does it -- you 17 know, the structure of the blind. I mean 18 there's all kinds of things we look for. 19 Q. Let's break for lunch. 20 (Lunch break taken.) 21 BY MR. ABDELNOUR: 22 Q. Welcome back, Chris. Page 27 of your 23 declaration. It's -- there's a section called 24 RCHB Licensing. Do you see that? 25 A. Mm-hmm.	Page 92 1 what -- do we consider it part of Outtech? Is 2 that why it's not in here? 3 A. Yes. 4 Q. Okay. Do you know the difference 5 between an exclusive license and a nonexclusive 6 license? 7 A. Yes. 8 Q. And you understand an exclusive license 9 would mean that the licensee is the only one who 10 would be allowed to practice the patent, 11 correct? 12 A. Yes. 13 Q. In Paragraph 72 you state that Bushnell 14 was an exclusive licensee starting in 2017; is 15 that right? 16 A. Yes. 17 Q. And then at some point that was 18 terminated. Do you see that in Paragraph 73? 19 A. Yes. 20 Q. Why did Bushnell terminate its 21 exclusive license? 22 A. Due to extensive copying in the market. 23 Q. Can you be more specific? 24 A. Yeah. Right after the release of the 25 2018/2019, there were, I believe, two
Page 91 1 Q. In Paragraph 70, you state that RCHB 2 currently has four different nonexclusive 3 licensees for the technology disclosed in the 4 '535 patent. Do you see that? 5 A. Correct. 6 Q. And you've identified Bushnell, which 7 is also Primos, correct? That's one? 8 A. Mm-hmm. 9 Q. Primal is two? 10 A. Mm-hmm. 11 Q. Millennium is three? 12 A. Correct. 13 Q. And Outtech is four? 14 A. Correct. 15 Q. And are all four of these entities 16 currently nonexclusive licensees? 17 A. Correct. 18 Q. Are there any other licensees of the 19 '535 patents? 20 A. Yes, most recent one, True North. It's 21 out of Canada. 22 Q. Why isn't that in your declaration? 23 A. It was signed -- it's kind of through 24 Outtech, so it kind of piggy-backed off that. 25 Q. What do you mean by that? I mean	Page 93 1 see-through blinds that -- the company were 2 putting out revolutionary, you know, same 3 jargon, that -- trying to think of what show it 4 was. I believe the ATA 2019 is when two 5 companies came out with a see-through blind that 6 caught in the market, and they were selling it 7 for a lot cheaper. 8 And then in 2020, here came several other 9 big ones that was Rhino, your client, and 10 several others, and it just kept more and more, 11 and until this day they're popping up every day, 12 so. So obviously -- 13 Q. Did Bushnell terminate the exclusive 14 license? 15 A. Yes. Because we weren't able to move 16 fast enough to -- and obviously we weren't able 17 to move fast enough for them to control the 18 fire -- the firestorm that this technology was 19 having in the industry where everybody was 20 trying to get their hands on it. And it was 21 such a big firestorm where there was multiple -- 22 almost every -- every company had see-through 23 hunting blinds by 2020 within two years. 24 Q. What was the date that Bushnell 25 terminated its exclusive license?

Page 94 1 A. I really -- honestly, I can't recall. 2 I can get that for you at a future date, but it 3 had to be -- actually, I can tell you when. It 4 was probably like 2021, I believe, because it's 5 kind of when -- it was right around the same 6 time, I believe, almost, that I first had 7 contact with your client about possibly doing 8 something, because they were coming out with one 9 that same year. So I don't know if it's 2020 or 10 2021. 11 Q. Okay. And you said that Bushnell took 12 on a new nonexclusive license after that? 13 A. Correct. 14 Q. When did that occur? 15 A. I believe that was after we got our 16 second patent and a guy named Jim Bruno took 17 over, and he's the one that called me and wanted 18 to hear our story and -- who was a CEO of 19 Bushnell, and we had a conversation. I never 20 threatened Bushnell or anything. We had a great 21 conversation, and I believe it was not only the 22 right thing to do to keep the relationship, but 23 what we had done with the Double Bull, putting 24 them out in the market and creating this 25 product, they wanted to continue to be a part of	Page 96 1 A. During when our -- when they -- when 2 they went -- you're talking about when -- I'm 3 sorry. When they did away with our exclusive, 4 you're saying, were they still selling? 5 Q. Correct. 6 A. Yes. 7 Q. They continued to sell unlicensed, 8 correct? 9 A. Correct. But there was conversations 10 being had around that time. We were still in 11 communication with them, because they knew that 12 we had other patents in the system going and 13 stuff. Like I said, it was not nothing -- there 14 was no bad blood or anything. We understand, we 15 totally understand their situation. They 16 totally understood ours. 17 Q. Did the terms of the license, other 18 than the fact that it was exclusive and then it 19 was nonexclusive, did other terms change between 20 the two licenses? 21 A. No. Nope. Got back and they paid, and 22 they paid all backpay for when that license, 23 when they canceled the license. They even gave 24 us money for all sales because they understood 25 our situation. So they did a great thing.
Page 95 1 us. And it also helped that we also got issued 2 another patent. I don't know if that was the 3 second or third patent that was issued. And -- 4 but really we understood -- again, me and my 5 brother -- we could only do what we did. We had 6 to put ourselves in the position first to try to 7 combat large corporations. I mean we're a small 8 company. So obviously that took time, and we 9 just didn't move fast enough. I understand that 10 we had an exclusive, and we just couldn't move 11 fast enough for them. And, of course, it was 12 heartbreaking, but we were able to, you know, 13 patch stuff up, and they understood with the new 14 CEO. And to this day, we have a great working 15 relationship with those guys. 16 Q. So as to my last question, I think in 17 Paragraph 73 you state that you entered into a 18 nonexclusive license with Bushnell in 2023. Is 19 that accurate? 20 A. Yep. Correct. 21 Q. Okay. Between the time that Bushnell 22 terminated its exclusive license and the time in 23 2023 when it took on a nonexclusive license, was 24 Bushnell continuing to sell its surround-view 25 hunting blinds?	Page 97 1 Q. Before -- so there's five licenses that 2 you've described in your declaration. 3 A. Mm-hmm. 4 Q. Correct? The four nonexclusive and the 5 one exclusive, correct? 6 A. Mm-hmm. 7 Q. In your declaration you agree with me 8 that you do not describe the terms of those 9 licenses, correct? 10 A. Correct. 11 Q. For instance, you don't identify the 12 licensing rate that somebody might be paying, 13 correct? 14 A. Correct. 15 Q. You don't disclose or describe the 16 amount of any payments being made pursuant to 17 any of these licenses, correct? 18 A. Correct. 19 Q. You don't describe whether these 20 patent -- whether these licenses cover just the 21 '535 patent or other patents, correct? 22 A. Correct. 23 Q. I take it that these licenses do relate 24 to patents other than just the '535 patent. Am 25 I right about that?

Page 98 1 A. Yes. 2 Q. In addition to not describing the terms 3 of those licenses in your declaration, you also 4 haven't provided those or disclosed those in the 5 context of this patent office proceeding; is 6 that correct? 7 A. Correct. 8 Q. At Paragraph 71, you state that these 9 license agreements were not borne from 10 accusations of patent infringement. Do you see 11 that? 12 A. Correct. 13 Q. I want to dig into that statement with 14 respect to these different licensees. Let's 15 start with Outtech, for example. Your 16 declaration doesn't describe who contacted who 17 first, does it? 18 A. Where was that paragraph? I'm sorry. 19 Q. I'm wondering where you've described 20 how the license with Outtech was facilitated? 21 A. Yes. It's a -- they reached out to us. 22 Q. Where are you looking? 23 A. 74. 24 Q. Okay. 25 A. Paragraph 74, yes, sir, top.	Page 100 1 And as far as them getting a lawyer involved, I 2 know I sent a -- our patent to them. I don't 3 know if I sent the other one. Again, I don't 4 know the dates when -- you know, if I had the 5 two patents, I had three patents. I don't know. 6 I don't recall. Whatever patents -- whatever 7 patents we had we gave to them so their 8 attorneys could look over it. And then we had a 9 contract, and I assume they had the contract 10 attorney looking over that as well. 11 Q. I assume at some point there were 12 written correspondence with Outtech, correct? 13 A. I don't think so. I mean Jay, Jay's 14 a -- Jay is the owner of that company, is 15 very -- no e-mails or anything. I don't know if 16 he can do an e-mail. He's an old-school guy. 17 I've always had telephone conversations with 18 him, to be honest with you. 19 Q. And who were -- sorry. Who were your 20 conversations with? 21 A. At that time was the owner, Jay 22 Schultz. 23 Q. Millennium Outdoors, talk about 24 Paragraph 75. Do you see that? 25 A. Mm-hmm.
Page 99 1 Q. Did Outtech reach out to you in a 2 letter or by phone? How did that happen? 3 A. By a phone call. I remember I was -- 4 right before I picked up my kid. I was in 5 school picking up Austin and Mason at school. 6 It was an Ohio number, I didn't recognize it. I 7 usually don't pick up -- you know what I mean? 8 And I picked up and just had a conversation. 9 Q. Did Outtech have lawyers involved? 10 A. No. 11 Q. At any time before consummating a 12 license, did Outtech have lawyers involved? 13 A. Well, I do believe they had our -- yes. 14 They did look at our patent. They wanted a copy 15 of it, so I assumed they gave it to their 16 lawyer. Did I have any contact with their 17 lawyer? No. And it was very trans -- it was 18 very -- very transparent conversation. They 19 actually, after we had the phone conversation -- 20 it's not in here -- they flew down to meet with 21 us. They wanted to meet us in person. They 22 wanted to hear our story, what our values were, 23 how we came up with the idea, and they loved 24 everything about it and wanted to be a part of 25 it. So that's kind of how that all happened.	Page 101 1 Q. You say Millennium Outdoors contacted 2 you and expressed an interest in a license? 3 A. Yes. 4 Q. Was that written or phone call? 5 A. It was actually in-person at a trade 6 show when I first met Ed. 7 Q. Which trade show? 8 A. I don't know if it was -- like I said, 9 they all run together. Either ATA or the SHOT 10 Show where they were at; most likely it was ATA 11 show. 12 Q. In 2022? 13 A. Was that the COVID year? Yeah. I 14 don't -- I don't know if I met him at a trade 15 show; or I know we shared camp together, hunting 16 camp, too, is around that same time. And he 17 expressed what he wanted to do, but I don't know 18 if I first met him in a trade show and we talked 19 about it. Does that make sense? I met him 20 prior, but I don't know if we started talking 21 about a trade show. But, again, I don't know, 22 you know, with COVID, right, was that 2022? 23 Again, I don't know. The only time I've never 24 been to ATA and the SHOT Show was the COVID when 25 they were canceled. Does that make sense?

Page 102 1 Q. Okay. 2 A. So I don't know when they first started 3 talking about it, but I know we did share camp 4 not long after that. And we -- he expressed 5 some -- he expressed that he wanted to start 6 using a pop-up blind as well as his other 7 structures. 8 Q. Do you have any written corroboration 9 of your testimony from Paragraph 75? 10 A. No. I have a contract. 11 Q. Same question generally for your 12 paragraph, the statement in Paragraph 71, that 13 the license agreements were not borne from 14 accusations of patent infringement. Have you 15 submitted any written evidence corroborating 16 your testimony? 17 A. As far as what? Like sending these 18 guys letters or anything? Is that what you're 19 asking? 20 Q. Correct. At any -- 21 A. I've never sent these guys any letters 22 of infringement or anything like that. These 23 all were generated from conversations, knowing 24 people in the industry saying: Hey, you need to 25 talk to these guys. That's basically how it	Page 104 1 place. You know, I know it's something we 2 talked about, so -- I know what -- where it's 3 referring to, but it's kind of odd where it's 4 placed, so. 5 Q. Okay. So you state in Paragraph 77: 6 Polyester -- based on my research, polyester or 7 polyester/cotton blend camouflage materials that 8 were not mesh material and one could not see 9 through materials have had denier ratings of as 10 low as 150 denier. Right? Is that your 11 testimony? 12 A. Again, that is something that we 13 started talking about that is referring to the 14 non-see material where, based on my research 15 after -- when this all -- you know, since 16 everything started taking place, based on my 17 research, that's what they used in the past 18 blinds. 19 Q. What research are you talking about? 20 Can you be more specific? 21 A. I mean I can't actually recall what 22 exact research. I mean again, like I said, I 23 believe that it had nothing to do with this 24 case. So I don't know if it was something we 25 were talking about that I considered. And,
Page 103 1 happened. Again, we got into this, I didn't 2 know one person in the industry. 3 Q. No. I -- and my question is just a 4 little bit different. I understand your 5 testimony. My question is is there any written 6 evidence that corroborates or supports your 7 testimony that these were not -- were not borne 8 out of accusations of patent infringement? 9 A. No written other than the contracts and 10 what I'm sworn to testify and the facts I've 11 written on 76 and -- 12 Q. I understand. 13 A. And 74. 14 Q. What's a denier rating? 15 A. Yeah. I was actually looking at that 16 earlier. That's something, you know, we 17 considered, but I don't really understand how 18 that got in there, you know. I really don't 19 understand how 77 got in there. I know what it 20 is. 21 Q. So let's back up. You're saying in 22 Paragraph 77 there's discussion of denier 23 ratings. You're saying you don't know how that 24 got in your declaration? 25 A. Correct. I don't know why it's in that	Page 105 1 again, it could just be a typo or whatever you 2 want to call it. 3 Q. But in Paragraph 77 where it says 4 "based on my research," my question is what 5 research are you talking about? 6 A. And that's what I'm telling you. I 7 don't recall exactly what research: if it was 8 an article, if it was a textbook, if it was a 9 YouTube video. I can't -- again, I've been 10 going through this since 2020. So I can't tell 11 you. I've read so much research since then, so 12 I can't tell you the exact pinpoint what I mean 13 by that. I don't understand why it is there. I 14 feel like it has nothing to do with this, so 15 that's all I can tell you. 16 Q. That's fair. That's fine. What is -- 17 I don't understand -- I want to know what a 18 denier rating is. What does that mean? 19 A. Denier rating, I do know like 20 1,000/1,000 denier, I know it has to do with the 21 weight and the thickness of the material. 22 That's basically all I know. Possibly -- I mean 23 I guess ask the expert or ask an expert about 24 denier or someone that's been in the industry 25 for a while. Like I said, that's all I know

Page 106 1 about it. 2 Q. Does denier rating of the material have 3 an impact on one-way viewing feature? 4 A. I cannot testify. If you look at 5 what's taken, and this is all I know, camouflage 6 materials that were not mesh material, and one 7 could not see through materials that had a 8 denier rating of as low as 180 denier. 9 Apparently these materials were used along the 10 walls, roofs, and one could not see through the 11 material. I believe I put that in there twice, 12 could not see through the material. These 13 materials may or may not have had a black inside 14 surface. So if you're asking to see through it, 15 I mean obviously I've said it twice, you cannot 16 see through it. 17 Q. So what denier rating do you need to 18 have for material to see through it? 19 A. Like I said previously, I am not a 20 denier expert. I have no idea. 21 Q. Did you write this paragraph, 77? 22 MR. WOLTER: Objection. 23 THE WITNESS: Did I write this? 24 MR. WOLTER: Go ahead. 25 BY MR. ABDELNOUR:	Page 108 1 declaration that are wrong or otherwise 2 inaccurate that you know of sitting here today? 3 A. Not that I can see at this time. 4 Q. You mentioned earlier that you have 5 four patents on this one-way mesh technology, 6 correct? 7 A. Yes. 8 Q. One of those is the '535 patent that's 9 at issue in this proceeding, right? 10 A. Yes. 11 Q. And we've talked about a lot of 12 different evidence of secondary considerations, 13 and that's in your declaration, right? 14 A. Yes. 15 Q. Do you have an understanding of how 16 that evidence relates specifically to the '535 17 patent as opposed to other patents? 18 MR. WOLTER: Objection. Lack of foundation 19 and beyond the scope, but. 20 THE WITNESS: I don't -- I don't even know 21 how to answer that. I guess if you want to -- 22 if Laura can repeat it again. 23 BY MR. ABDELNOUR: 24 Q. Let me try it a different way. Is any 25 of the secondary consideration evidence that
Page 107 1 Q. Yeah. Did you write it? 2 A. If you're asking did anyone sit here 3 and write a declaration, I don't know the 4 format, of course. My attorney wrote this, 5 this, how it was all -- it's got to be put in 6 some certain way. I have no -- I don't have the 7 skill to write a declaration. I didn't even 8 know what it was until a couple weeks ago, 9 months ago, whatever. 10 Q. If you look on Page 29, Mr. Seaton, you 11 see your name and signature there. Is that your 12 signature? 13 A. Yes. 14 Q. Dated September 3rd, '24. Do you see 15 that? 16 A. Mm-hmm. 17 Q. Is -- Does this declaration contain 18 your full and accurate testimony that you wish 19 to provide the patent office in connection with 20 this case? 21 A. Yes. 22 Q. And do you stand by it? 23 A. Yes. 24 Q. Other than what we talked about in 25 Paragraph 77, are there any mistakes in the	Page 109 1 you've submitted in this case specific to the 2 claims of the '535 patent as opposed to your 3 other patents, to your knowledge? 4 A. I would say yes. Again, I don't -- I 5 don't understand the legal secondary patents, I 6 just -- I'm not understanding your question. 7 I'm not trying to be hard. I mean I'll answer 8 it, but if you're saying that do I feel like 9 these secondary considerations for '535, but 10 that's the only one in question here. My other 11 ones, I don't have to provide secondary 12 considerations, because they're already -- they 13 have already been assigned to me. Does that 14 make sense? Like so I'm a little confused. I 15 don't know how to answer that question, because 16 this is about '535, and this is -- obviously we 17 have a lot of secondary consideration evidence, 18 which is -- this is only maybe 5 percent what we 19 actually have. We can't put everything in here, 20 because it's nearly impossible. We'd sit here 21 for a month with videos, social media posts, 22 comments, and hundreds and hundreds of articles. 23 Articles that are still written to this day, 24 2023, about the -- 25 Q. I understand. But let me try to get us

Page 110 1 back on track a little bit. And I understand if 2 this is something that you don't understand, and 3 just bear with me. The question -- I'll try one 4 different way. Did you do anything to take the 5 secondary consideration evidence you've 6 submitted in your declaration and assign it 7 between the different -- four different patents 8 that you own allocated between the four 9 different patents? 10 A. I have no idea. We've gone through so 11 much -- you've got to understand, I've been 12 going through this since 2015. We had -- I'm 13 just saying, so like I -- and there's four of 14 them. I don't know if secondary considerations 15 were used one or two; one of them, two of them, 16 none of them. Do you know what I'm saying? All 17 I know is these secondary considerations that I 18 have on this form right here in front of me, my 19 declaration, is representative of the '535. 20 That's all I know. And because I don't really 21 understand -- I don't -- do you get -- I don't 22 know that legal process. I really don't, and if 23 I did -- 24 Q. I understand. 25 A. You know what I'm saying? I don't want	Page 112 1 BY MR. ABDELNOUR: 2 Q. You've identified four companies that 3 have licenses in this case. We don't have the 4 licenses, but you've identified four companies. 5 Let's take them one at a time. Does Primos or 6 any entity related to Primos have a financial 7 interest in Rugged Cross's '535 patent? 8 A. No. 9 Q. Does Primos have any interest 10 whatsoever, whether it be financial or 11 otherwise -- 12 A. No. 13 Q. -- in the '535 patent? 14 A. No. 15 Q. Does Primos have any ownership or other 16 financial or otherwise stake in Rugged Cross? 17 A. No. 18 Q. Same questions with respect to Primal. 19 Do they have any interest in the '535 patent? 20 A. No. 21 Q. Financial or otherwise? 22 A. No. 23 Q. Do they have any interest in Rugged 24 Cross? 25 A. No.
Page 111 1 to say something that's not accurate. Does that 2 make sense? 3 Q. That's fair. Let me move to a 4 different -- 5 A. Robert could -- you can ask Robert. 6 Q. Well, Robert doesn't get to testify. 7 A. Honestly, I don't know. I -- you can 8 ask it any way -- 9 Q. Let me move to a different topic. So 10 can you identify for me all individuals having a 11 financial or other interest in Rugged Cross? 12 MR. WOLTER: Objection. Calls for 13 confidential information. Beyond the scope. 14 Lack of foundation. Not relevant to this 15 inquiry at all. 16 BY MR. ABDELNOUR: 17 Q. You can answer. 18 MR. WOLTER: No, you can't. That's 19 confidential -- 20 THE WITNESS: -- I cannot answer. 21 MR. ABDELNOUR: All right. I'm -- I'll ask 22 some specific questions -- Robert, I disagree 23 with your objection, but I'll ask some different 24 questions and let's see if you'll let him 25 answer.	Page 113 1 Q. Outtech. Does Outtech have any 2 interest in the '535 patent financial or 3 otherwise? 4 A. No. 5 Q. Does it have any interest in Rugged 6 Cross? 7 A. No. 8 Q. Does Millennium have any financial or 9 otherwise interest in the '535 patent? 10 A. No. 11 Q. In Rugged Cross? 12 A. No. 13 Q. Let's do this. I'm almost -- I'm near 14 the end, Mr. Seaton. I'd like to take a look at 15 my notes. If we want to take a break, let's 16 take 10, and then we'll come up and -- I usually 17 don't do this, but I'll promise to wrap it up 18 pretty quick after that. 19 A. Okay. Thank you. 20 (Short break taken.) 21 BY MR. ABDELNOUR: 22 Q. Okay. Chris, turn to Pages 24 and 25 23 of your declaration. And Paragraph 63 and 64 24 refer to a company called Feradyne Outdoors. Do 25 you see that?

Christopher Seaton
October 29, 2024

Page 114 1 A. Paragraph what? 24? 2 Q. 63 and 64. 3 A. Oh, I'm sorry. I thought you said 23. 4 Okay. 5 Q. And those paragraphs refer to Feradyne 6 Outdoors. Do you see that? 7 A. Yes. 8 Q. And Rugged Cross has a patent suit 9 against Feradyne, correct? 10 A. Correct. 11 Q. Does Rugged Cross have, outside of the 12 context of that lawsuit, does Rugged Cross have 13 any relationship with Feradyne? 14 A. No. 15 Q. Or any of -- with any of Feradyne's 16 employees? 17 MR. WOLTER: Objection. Beyond the scope. 18 But go ahead and answer. 19 THE WITNESS: No. I couldn't tell you if I 20 seen them. I don't know one person there. 21 BY MR. ABDELNOUR: 22 Q. I want to go back. You testified that 23 you and your brother Timothy Seaton have 24 ownership control of Rugged Cross, right? 25 A. Correct.	Page 116 1 First of all, there was -- do you remember he 2 asked you questions regarding financial interest 3 others may have in Rugged Cross? You're on 4 mute. You're muted. 5 A. Sorry. 6 MR. WOLTER: Can you repeat the question, 7 Laura? 8 (Record read back.) 9 THE WITNESS: Yes. 10 BY MR. WOLTER: 11 Q. Do any of your licensees have an 12 interest in, for example, the outcome of this 13 IPR? 14 A. This one in particular, will it change 15 any of the outcome of them paying me? No. 16 Q. If this patent isn't -- why is that? 17 A. Because all four patents need to be 18 invalidated. 19 Q. So is it fair to say if all patents are 20 invalidated, then they -- your licensees no 21 longer have to pay royalties; is that correct? 22 A. Correct. 23 Q. If this patent is found valid in the 24 IPR, then the licensees will continue to pay 25 royalties presumably?
Page 115 1 Q. Outside of you and Timothy Seaton, are 2 there any other owners of Rugged Cross? 3 MR. WOLTER: Same objection. But go ahead 4 and answer. 5 THE WITNESS: No. My worry the company -- 6 how we're paying for this; I have taken 7 everything out of my law enforcement retirement 8 401(k) and Florida retirement system to pay for 9 this. And my brother has did the same to this 10 point. 11 BY MR. ABDELNOUR: 12 Q. Are there any entities that have any 13 financial or ownership control in Rugged Cross? 14 A. No. It's just me and my brother. 15 Q. I have no further questions. 16 MR. WOLTER: Okay. Dennis, can you give us 17 just a few minutes? I have a few questions for 18 redirect and then give us five minutes, and we 19 can wrap it up afterwards. 20 MR. ABDELNOUR: Okay. 21 (Short break taken.) 22 Examination 23 By Mr. Wolter 24 Q. Mr. Seaton, I have some questions to 25 follow up Mr. Abdelnour's line of questioning.	Page 117 1 A. Yes. 2 MR. ABDELNOUR: Objection to scope. 3 BY MR. WOLTER: 4 Q. Do you recall questions and answers 5 regarding secondary considerations including 6 industry praise? 7 A. Yes. 8 Q. Can you tell us about any awards that 9 Primos may have won regarding the Double Bull 10 surround-view blind? 11 A. Yes. That was the biggest one in our 12 industry, in the entire outdoor industry, is our 13 NRA Golden Bullseye Award. I guess you could 14 probably say it's like the Grammy or Oscar of 15 the whole industry; products like when the Yeti 16 cooler came out, it won it that year for that 17 category. They also won another time when they 18 had the soft-shell cooler. But basically they 19 look at the entire outdoor industry, fishing, 20 the whole nine yards, anything that deals with 21 outdoors. And there's a set of like not -- I 22 want to say like eight, could be five -- I don't 23 know how many -- but it's like industry praise, 24 how innovative it was, sells, how it caught the 25 attention to the market. I don't know if

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Page 118 1 every -- I don't know if it was to do with 2 competition. I don't really know just facts, 3 but I know it was a big deal, because it was the 4 first time -- and you're talking about the size 5 of Primos and Vista -- I believe it was the 6 first time they've ever won that big of an award 7 in our industry. 8 MR. ABDELNOUR: I'm going to object to this 9 line of questioning as outside of the scope of 10 my cross-examination and move to strike. 11 BY MR. WOLTER: 12 Q. Mr. Seaton, Mr. Abdelnour asked you 13 questions regarding copying of your invention. 14 In particular, what evidence do you have, for 15 example, of the petitioner DBR of copying your 16 invention. 17 A. First I have they asked me more than 18 once to send them my material, which I did. So 19 they had my material. Also the way they are 20 describing their material with that company and 21 podcast, talking about how innovative it was, 22 like their idea how it's selling off the 23 shelves, how -- and just the -- you can -- the 24 articles speak for themselves. The videos speak 25 for themselves. The podcast is a very good one	Page 120 1 Q. Okay. So and is it -- and so then 2 make -- and so someone at DBR reached out to 3 Rugged Cross regarding a potential license; is 4 that correct? 5 A. Yeah. That's when we just first 6 started talking about the idea, yes. 7 Q. Was that in the summer or fall of 2020? 8 A. Yes. 9 Q. Okay. So when did you send -- so 10 what -- so when did you send the mesh material 11 to DBR? 12 A. I can check on the date for you, but it 13 was sometime around that. Before we had a 14 meeting they called me and asked me if I would 15 introduce them to one of my good friends in the 16 manufacturing in the States, because they were 17 still having issues with COVID getting their 18 product overseas. So they were looking for a 19 source in America. So I took the time to take 20 them over to Elkhart, Indiana, to meet with my 21 buddy, possibly manufacturing hunting blinds 22 with them for them, but with the aspect of we 23 were going to sign my -- a royalty deal, but 24 that never happened. 25 Q. It --
Page 119 1 to listen to. And then -- 2 Q. Mr. Seaton, I'm going to interrupt. So 3 who at -- who at DBR was asking for your one-way 4 see-through mesh material? 5 MR. ABDELNOUR: Objection. Outside the 6 scope. 7 BY MR. WOLTER: 8 Q. Please answer. 9 A. The product developer, Mick. 10 Q. Was it Mick Maynard? 11 A. Yes. 12 Q. And did those discussions occur 13 sometime in 2020 before -- I'm sorry. Did -- 14 did DBR first reach out to you regarding 15 discussions of your patent and the one-way 16 see-through mesh material? 17 A. Yes. Through a mutual friend of the 18 industry at the ATA show. 19 Q. Who was that? 20 A. I believe it was Brian Short of Rotary 21 (ph.) said I should talk to the Rhino blinds 22 guy. 23 MR. ABDELNOUR: Objection. Outside the 24 scope. 25 BY MR. WOLTER:	Page 121 1 MR. ABDELNOUR: Objection. Outside the 2 scope. Move to strike. 3 BY MR. WOLTER: 4 Q. But that meeting took place in Elkhart, 5 Indiana; is that correct? 6 A. Correct. 7 MR. ABDELNOUR: Same objection. Outside the 8 scope. 9 BY MR. WOLTER: 10 Q. That meeting took place in June of -- 11 MR. ABDELNOUR: Robert, just let me make my 12 objections before you ask the next question, 13 please. 14 MR. WOLTER: Did you have an objection? 15 BY MR. WOLTER: 16 Q. So that meeting took place in June 17 2021; is that correct? 18 MR. ABDELNOUR: Same objection. 19 THE WITNESS: Yes. 20 BY MR. WOLTER: 21 Q. And before that meeting, is it correct 22 that you had sent your mesh material to DBR? 23 A. Correct. 24 MR. ABDELNOUR: Objection. Leading. Outside 25 the scope.

Page 122 1 BY MR. WOLTER: 2 Q. And how do you know they got the -- did 3 they receive the mesh material? 4 MR. ABDELNOUR: Objection. Foundation. 5 THE WITNESS: They received the mesh 6 material. I asked them if they received it, I 7 sent it -- well, prior they were in a rush to 8 get it before that meeting. So I checked with 9 my -- through my office to see if the UPS guy 10 picked it up. They did not. So I, again, took 11 it to FedEx and overnighted it so he would have 12 it before our meeting. He also sent some blinds 13 to my buddy so my buddy could look at it prior 14 to that meeting. And, again, prior to that 15 meeting started, I asked about our contract and 16 where we were at on it, and he said we got 17 plenty of time to talk about that. So I said 18 okay. So we went along, did an hour-long 19 through the manufacturer plant to see his 20 facility at which time I offered to drop them 21 off at the airport so they wouldn't take an 22 Uber. And before he got out, I asked him again: 23 Hey, when are we going to talk? And that's when 24 he already had a contract signed with, I guess, 25 Tru-View. And I dropped them off at the tarmac	Page 124 1 for example, by GSM? 2 A. Yes. As I testified earlier, that's 3 what we do. We purchase the product online and 4 I take pictures, I examine it, and then we even 5 sent some off to, you know, sent some off to 6 experts about interwoven/woven, and that's what 7 we do before we even accuse somebody of 8 infringing. But we try to start with a 9 conversation first. I've -- like how we started 10 with Rhino. We tried to have a conversation 11 first. 12 Q. Okay. The industry praise that's been 13 discussed, there's also -- with respect to that 14 industry praise -- mention of the one-way 15 see-through feature of this mesh material. Is 16 that industry praise due solely to that feature 17 of the hunting blind? 18 MR. ABDELNOUR: Objection. Form. 19 BY MR. WOLTER: 20 Q. Is it -- is it your understanding that 21 it's just due solely to that feature of the 22 one-way see-through? 23 A. It's got to be -- it's a combination of 24 that material being put on a hunting blind and 25 being put out in the elements. You got camo
Page 123 1 because -- maybe Nick said it in my text 2 message, they have, I guess, their own private 3 jet. So I dropped them off there and left. And 4 I was totally sidestepped because I spent all my 5 money trying to help them out, and I thought 6 that they were going to sign a deal with us for 7 our hunting blinds. 8 BY MR. WOLTER: 9 Q. Other than DBR, what evidence do you 10 have of others copying your invention? 11 MR. ABDELNOUR: Objection. Outside the 12 scope. 13 THE WITNESS: Well, dealing with the copying 14 issue is -- there's only several manufacturers 15 overseas that make -- I guess manufacture 16 hunting blinds using that material. I know a 17 couple of them by name but there are only a 18 handful of them. So all these manufacturers in 19 the States are getting their blinds made by the 20 same companies, so it's no secret. It's just a 21 different name on a blind. But in the same 22 realm, scheme of things, they're all using the 23 same material. 24 BY MR. WOLTER: 25 Q. Have you inspected mesh material used,	Page 125 1 mixed in with elements. There's all kinds of -- 2 there's several factors that play in. 3 Q. Okay. That's -- those all the 4 questions I have for redirect. 5 Re-Examination 6 By Mr. Abdelnour 7 Q. Mr. Seaton, these interactions with DBR 8 that you just described, that was in 2020, 9 right? 10 A. I can give you the exact date of them. 11 Q. I don't need the exact date. They were 12 in 2020? 13 A. That sounds right. 14 Q. All right. And the '535 patent issued 15 in August of 2022, correct? 16 A. Correct. 17 Q. After any discussions with DBR, true? 18 A. After the discussions began? 19 Q. After discussions with DBR that you 20 described in your testimony just now. 21 A. Were they before that date? Yes. 22 Q. And your first patent that issued in 23 this family is U.S. Patent No. 10,765,108, 24 correct? 25 A. That sounds right.

Page 126 1 Q. All right. That issued in September of 2 2020. Sound right? 3 A. Correct. 4 Q. And this IPR is not dealing with the 5 '108 patent. You understand that, right? 6 A. Absolutely. 7 Q. And Rugged Cross is not accusing DBR of 8 infringing the '108 patent in its lawsuit, 9 correct? 10 A. Correct. 11 Q. Nothing further. 12 MR. WOLTER: I don't have any further 13 questions. 14 MR. ABDELNOUR: E-tran, yes. 15 MR. WOLTER: Copy of the transcript, yes, 16 please. 17 (Witness excused.) 18 * * * * * 19 20 21 22 23 24 25	Page 128 1 the parties. 2 Witness my official signature in and 3 for the County of Cook, State of Illinois, on 4 this 13th day of November A.D., 2024. 5 6 7 8  9 10 LAURA MUKAHIRN, CSR, RPR, CRR 11 CSR NO. 084-003592 12 13 14 15 16 17 18 19 20 21 22 23 24 25
Page 127 1 STATE OF ILLINOIS) 2) SS. 3 COUNTY OF COOK) 4 5 I, LAURA MUKAHIRN, Certified 6 Shorthand Reporter and Notary Public in and for 7 the County of Cook, State of Illinois, do hereby 8 certify that on October 29, 2024, the deposition 9 of the witness, CHRISTOPHER SEATON, called by 10 the Petitioner, was taken before me, reported 11 stenographically, and was thereafter reduced to 12 typewriting under my direction. 13 The said deposition was taken 14 remotely, and there were present counsel as 15 previously set forth. 16 The said witness, CHRISTOPHER 17 SEATON, was first duly sworn to tell the truth, 18 the whole truth, and nothing but the truth, and 19 was then examined upon oral interrogatories. 20 I further certify that the foregoing 21 is a true, accurate, and complete record of the 22 questions asked of and answers made by the said 23 witness, CHRISTOPHER SEATON, at the time and 24 place hereinabove referred to. 25 The undersigned is not interested in the within case, nor of kin or counsel to any of	

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