

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

DBR FINANCE, INC.,)
 Petitioner,)
 vs.) No. IPR2024-00291
 RUGGED CROSS HUNTING)
 BLINDS, LLC,)
 Patent Owner.)

The discovery deposition of JAY SCHOLLES, conducted virtually, taken in the above-entitled cause, before Rebecca Boyce, an Illinois Shorthand Reporter, on November 1, 2024 at 9:04 a.m. pursuant to notice.

Rebecca Boyce, CSR

License No.: 084-004726

1 APPEARANCES:

2 ESCHWEILER & POTASHNIK, LLC

3 BY: MR. THOMAS ESCHWEILER

4 195 South Main Street

5 Suite 1400

6 Akron, Ohio 44308

7 (216) 502-0600

8 teschweiler@epiplaw.com

9 and

10 HONIGMAN, LLP

11 BY: MR. DENNIS J. ABDELNOUR

12 155 North Wacker Drive

13 Suite 3100

14 Chicago, Illinois 60606

15 (312) 701-9300

16 dabdelnour@honigman.com

17 Representing the Petitioner;

1 APPEARANCES (Continued):

2 WALTER VANDYKE DAVIS

3 BY: MR. ROBERT L. WOLTER

4 1900 Summit Tower Boulevard

5 Suite 140

6 Orlando, Florida 32810

7 (407) 926-7700

8 rwolter@savvyiplaw.com

9 Representing the Patent Owner.

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I N D E X

WITNESS	EXAMINATION
JAY SCHOLLES	
By Mr. Abdelnour	5
By Mr. Wolter	45

E X H I B I T S

NUMBER	MARKED FOR ID
Deposition	
Exhibit 2035	8
(Exhibit retained by Mr. Abdelnour.)	

1 (Witness sworn.)

2 JAY SCHOLES,

3 called as a witness herein, was examined and

4 testified as follows:

5 EXAMINATION

6 BY MR. ABDELNOUR:

7 Q. Good morning. Would you please state your
8 name and address for the record?

9 A. My name is Jay Scholes, S-C-H-O-L-E-S. I
10 live at 930 Meadowbrook Drive, Aurora, Ohio.

11 Q. Thank you, Mr. Scholes.

12 A. You want my office address as well?

13 Q. No. Well, tell me where you work.

14 A. I own a company called Outtech, which is
15 based in Aurora, about two miles away from where I
16 live, downtown Aurora, thriving metropolis.
17 Started back in 1988, incorporated in 1989.

18 Q. Have you been deposed before?

19 A. Yes.

20 Q. How many times?

21 A. I believe probably at least two, three
22 times, different product situations, different
23 companies.

24 Q. Ever in connection with a patent case?

25 A. No, I don't think so, no.

1 Q. When was your last deposition?

2 A. Probably eight, ten years ago.

3 Q. Let me run through the ground rules real
4 quick just so we're all on the same page and it's a
5 refresher for you. You understand you're under
6 oath?

7 A. Yes.

8 Q. So I'm going to ask questions, and you
9 understand that you'll provide answers; correct?

10 A. Correct.

11 Q. For the benefit of our court reporter,
12 this is going to be transcribed, and I'll do my
13 best, but just make sure all your answers are
14 audible as opposed to head shakes and things like
15 that; fair enough?

16 A. Yes.

17 Q. If you don't hear a question, let me know,
18 and I'll ask it again; fair enough?

19 A. Yes.

20 Q. If you don't understand one of my
21 questions, please also let me know, and I want to
22 try to make sure you understand it before you do
23 provide an answer; fair enough?

24 A. Yes, sir.

25 Q. All right. If you do give me an answer,

1 is it fair for me to assume that you've heard it
2 and understood the question?

3 A. Yes, sir.

4 Q. Okay. Thank you. Any reason you can't
5 give full, complete, and accurate and truthful
6 testimony today?

7 A. No.

8 Q. Do you understand you're here in
9 connection with a Patent Office challenge by DBR to
10 a patent owned by a company called Rugged Cross?

11 A. Yes.

12 Q. Have you ever been involved in any Patent
13 Office proceedings before?

14 A. No. Let me preface that. I have patent
15 discussions all the time with vendors we represent
16 but not in their legal proceedings.

17 Q. Okay. And I should clarify a little bit.
18 I take it you've never been involved in a Patent
19 Office proceeding challenging validity of a patent,
20 correct?

21 A. Correct.

22 Q. And so we're all on the same page, we're
23 here in connection with IPR No. 2024-291. Does
24 that sound right to you?

25 A. Yes.

1 Q. And you've submitted a declaration in
2 support of Rugged Cross in this matter, is that
3 right?

4 A. That is correct.

5 Q. And that's why we're here today. You
6 understand that?

7 A. Yes.

8 Q. Do you have a copy of your declaration in
9 front of you?

10 A. No, I don't. I mean, I've got it on my
11 phone here. I've read it thoroughly.

12 Q. Now, if I share my screen, are you going
13 to be able to see everything here?

14 A. I will try.

15 (Whereupon, Deposition
16 Exhibit 2035 was marked for
17 identification.)

18 BY MR. ABDELNOUR:

19 Q. Let's do that. I'm going to share my
20 screen. I'm going to post on the screen a
21 document. This document is -- let me know if you
22 can see that.

23 A. It's difficult, but I will try.

24 Q. Let me make it bigger. So this is titled
25 the Declaration of Jay Scholes in Opposition to

1 Petition for Inter Partes Review of U.S. Patent
2 No. 11,399,535. Do you see that?

3 A. Yes, I do.

4 Q. Is this the declaration you've submitted
5 in this case?

6 A. Yes.

7 Q. And for the record, your declaration has
8 been marked as Exhibit 2035; correct?

9 A. Yes.

10 Q. This is an 11-page document. I'm going to
11 flip to the last page for you, and there is a
12 signature block there, and it is dated September 4,
13 2024. Do you see that?

14 A. Yes, I do.

15 Q. Is that your signature?

16 A. Yes.

17 Q. Okay. And have you submitted this
18 declaration under penalty of perjury?

19 A. Yes.

20 Q. And you swear to the truth of the contents
21 of this declaration?

22 A. I do.

23 Q. Sitting here today, are you aware of any
24 inaccuracies in your declaration?

25 A. No.

1 Q. Anything you would like to correct?

2 A. No, sir.

3 Q. Does this declaration contain the complete
4 contents of the testimony you wish to provide in
5 this proceeding?

6 A. Yes.

7 Q. Let me flip to paragraph 27 of your
8 declaration. Can you see that?

9 A. 27, yes.

10 Q. Okay. The final sentence of paragraph 27,
11 you testify that you had the belief and
12 understanding -- and I'm going to skip to the
13 end -- you had the belief and understanding that
14 Rugged Cross had valid patents to protect this
15 technology, and I believe that today. Do you see
16 that?

17 A. Yes, I do.

18 Q. So it's your belief sitting here today
19 that Rugged Cross has valid patents, correct?

20 A. It is, yes.

21 Q. What is your belief based upon?

22 A. My expertise in the industry for over 35
23 years, developing products and my knowledge of the
24 industry and the sport of hunting.

25 Q. Anything else?

1 A. No. This is what I know. This is what
2 I've done my entire life. I've brought hundreds of
3 products to market in the industry. I think what
4 Rugged Cross has is revolutionary. It's
5 impact-worthy within the marketplace.

6 Q. Now, I take it you're not a patent
7 attorney; correct?

8 A. No, I'm not a patent attorney, sir.

9 Q. I take it you're unfamiliar with the
10 standards for validity in a patent case, correct?

11 A. Yes, sir.

12 Q. Are you familiar with the 535 patent
13 that's at issue in this case?

14 A. No.

15 Q. Have you ever read it?

16 A. No.

17 Q. Have you read the claims?

18 A. I have looked at the claims a while ago.

19 Q. Did you look at the claims in connection
20 with preparing your declaration?

21 A. I reviewed them. Again, that was a while
22 ago.

23 Q. Can you be more specific?

24 MR. WOLTER: Objection --

25 THE WITNESS: I don't think I can because I --

1 like you said, I'm not an attorney. I'm not a
2 patent attorney. I'm an expert in the hunting and
3 outdoor industry and the products that make up that
4 industry.

5 BY MR. ABDELNOUR:

6 Q. In paragraph 27, you state that Rugged
7 Cross had valid patents, plural. How many patents
8 does Rugged Cross have?

9 A. I know, at the time, they received one
10 patent and applied for additional patents. Dennis,
11 again, I've got to be honest with you. You're
12 asking me questions that I feel like I'm on here to
13 tell you whether this is viable or not. I'm not an
14 attorney, and maybe I need to have an attorney
15 present with me depending on how this goes.

16 Q. I understand that. I just want to
17 understand the basis for your testimony.

18 A. I can tell you that if you want, Dennis.
19 The basis for my testimony is that I saw an
20 innovative product, which is what I do for a
21 living. I look for innovative products in the
22 outdoor industry. People come to my firm, which is
23 highly respected and revered in the outdoor
24 industry. You can do your homework. I'm sure you
25 already have, and when I saw the see-through

1 technology, I was blown away. In my mind and I
2 believe I said it several times -- I think it's in
3 my affidavit -- I think it's probably one of the
4 top ten innovations I've seen for a long, long
5 time, long time. It changes the market.

6 Q. I understand your testimony. You said at
7 the time, I think in response to your answer
8 earlier. You mean in December of 2021, you knew
9 that Rugged Cross had one patent and other
10 applications. Is that your understanding?

11 A. Other applications pending yes.

12 Q. Did you conduct an invalidity or validity
13 analysis of the patents in December '21 when you
14 were negotiating this license?

15 A. No. I had a business partner that has
16 since retired that headed that up for me, but we
17 did read through it and felt that it was valid.

18 Q. Did you have a patent attorney conduct a
19 validity analysis of the Rugged Cross patents?

20 A. I don't believe so.

21 Q. Did you conduct a prior art analysis on
22 these patents?

23 A. I don't know.

24 Q. Have you reviewed the prior art references
25 that are being asserted against the 535 patent in

1 this IPR?

2 A. I don't know how to answer that.

3 Q. Let me see if I can help with that. So in
4 this IPR, there are various prior art references
5 which are patents that DBR has submitted to the
6 Patent Office. Have you reviewed those in
7 connection with your testimony about validity?

8 A. Yes. Did we do our research regarding
9 Rugged Cross and the validity of their patent?
10 Yes, I believe we did, yes.

11 Q. But my question is a little bit different.
12 Did you review the specific prior art references
13 that are at issue in this IPR?

14 A. Yeah, I don't understand the meaning of
15 your question. I really don't. I feel like I'm
16 being pulled into a line of questioning that -- I
17 don't know. It makes me feel uncomfortable.

18 Q. Well, let me try to do it in a way that's
19 not uncomfortable. Outside of your declaration,
20 have you reviewed any of the documents that are at
21 issue in this legal proceeding, this IPR Patent
22 Office challenge?

23 A. Yes, I have.

24 Q. Which documents?

25 A. Sir, I couldn't tell you. Looking at all

1 the information regarding this situation regarding
2 Rugged Cross, looking at all those, there's been
3 lots of information, but I don't focus on that.
4 It's not why I believe I should be here.

5 Q. Are you offering expert testimony in this
6 case --

7 A. Yes.

8 Q. -- on the validity of the patents?

9 A. I'm offering expertise based on Rugged
10 Cross, their product that they've offered to the
11 market and how it has changed the industry. It has
12 had an impact on the market, which I've only seen
13 maybe a dozen times in 30 years.

14 Q. You agree you're not offering expert
15 testimony on the question of validity, fair?

16 A. I would say yes --

17 MR. WOLTER: Objection to the form of the
18 question. The declaration speaks for itself.

19 MR. ABDELNOUR: You can answer if you
20 understand.

21 THE WITNESS: Again, I'm a little confused by
22 your questioning, but am I knowledgeable of the
23 Rugged Cross patent and the product? Hell yes, I
24 am.

1 BY MR. ABDELNOUR:

2 Q. I know this is uncomfortable, but I do
3 want to close the loop and understand. Can you be
4 more specific about the documents that you've
5 reviewed --

6 A. Not without my attorney, no, because,
7 again, I don't understand where this is going. Am
8 I aware of the patent that Rugged Cross has? Yes.
9 Am I aware that they had additional applications?
10 Yes. Do I believe in their product? I wouldn't be
11 on this call if I didn't believe that they had an
12 absolute innovative product within the market. I'm
13 just being honest, by the way, Dennis. I'm being
14 forthright and absolutely honest.

15 Q. How were you compensated for your time in
16 preparing the declaration?

17 A. I'm not compensated at all. Zero. So I'm
18 very clear, zero compensation.

19 Q. Do you have any interest, financial or
20 otherwise, in Rugged Cross's patents?

21 A. Absolutely not. Absolutely not.

22 Q. Do you have an interest, financial or
23 otherwise, in Rugged Cross?

24 A. Absolutely not.

25 Q. Tell me how you prepared the declaration.

1 A. I sat down with my assistant and reviewed
2 it and put it together, and that was it.

3 Q. What do you mean you reviewed it? Did
4 somebody else write the draft?

5 A. Sir, I don't know how busy you are, but
6 I've got 40 clients and over 100 employees. So I'm
7 a very busy man, so I have a personal assistant
8 that I dictated my beliefs to her, and that's how
9 that was done, but it's my words, my belief. I
10 stand by what's in my declaration, 100 percent, if
11 that's what you're asking.

12 Q. Who asked you to prepare a declaration in
13 this case?

14 A. I was asked, I believe, by Robert if I was
15 willing to participate in this process or what my
16 beliefs were, and I told him -- I'm a
17 right-and-wrong guy. I'm no nonsense. Rugged
18 Cross has got an innovative product, an innovative
19 market strategy that they have tried to launch
20 and -- anyways, so I believe in that.

21 Q. When you say Robert, do you mean
22 Mr. Wolter?

23 A. Yes.

24 Q. Have you had any discussions with
25 Mr. Chris Seton (Phonetic) about this proceeding or

1 your declaration?

2 A. No, no, not at all.

3 Q. When was the last time you had a
4 discussion with Chris Seton?

5 A. Probably about two weeks ago when I
6 checked on him about the hurricane because I was in
7 Asheville, North Carolina dealing with my own
8 issues, and so we talked about some real important
9 stuff, some big bucks that we had on camera that we
10 were going to try to hunt this fall.

11 Q. I take it not about this proceeding?

12 A. No, not about this proceeding at all. In
13 fact, so it's clear, we didn't even talk business.
14 It was more or less he was asking about my wife,
15 who's recovering from cancer surgery three weeks
16 ago, and he was inquiring about that, and I was
17 asking him, was he safe after the two hurricanes
18 that hit him in Florida. That's it.

19 Q. How did you prepare for today's
20 deposition?

21 A. Well, I got up, took a shower, brushed my
22 teeth, shaved, and came into my master bedroom
23 instead of going to the office today, and I read my
24 declaration that I had written and reviewed. Other
25 than that, that's it.

1 Q. Any discussions with anybody in
2 preparation for today?

3 A. No, no. Again, I'm a very busy guy, very
4 hard to get ahold of because I'm going nonstop;
5 right? Again, you probably know what it's like to
6 have 45 clients and working with major retailers
7 such as Dick's Sporting Goods, Walmart, Academy,
8 Bass Pro, Scheels, and 3,000 independent retailers,
9 and, Dennis, I want to try to help you anyway I
10 can. I want to be cooperative to the best of my
11 ability here.

12 Q. Paragraph 22 of your declaration, I'm
13 going to put it on the screen. Let me know if you
14 can see that.

15 A. Yes, I can.

16 Q. In paragraph 22, you state, I was first
17 made aware of and witnessed a blind made of novel
18 one-way see-through mesh material during a turkey
19 hunt in Southern Ohio in early 2021; is that
20 correct?

21 A. Yes.

22 Q. I think later in your declaration, you
23 discuss the SurroundView blinds by Primos; right?

24 A. Yes.

25 Q. And I think you mentioned that the

1 SurroundView blinds were introduced in 2018, right?

2 A. I believe that's when they were
3 introduced.

4 Q. Okay. Were you unaware of the Primos
5 blinds until 2021? Is that your testimony?

6 A. No. They were in the blind business prior
7 to that, just (Inaudible) --

8 Q. Sorry. Just to clarify. Were you unaware
9 of the Primos SurroundView blinds until 2021?

10 A. I was aware of the see-through blinds by
11 Primos as soon as they hit the market,
12 instantaneously. When those products hit the
13 market, I was aware of it. So, again, the exact
14 date and time, it's very hard for me to tell you,
15 but my business is knowing what's going on in the
16 market. So when that was launched, I was aware of
17 it, and I had samples of the product.

18 Q. I guess then are you saying that the
19 statement here in 22 that says, "I was first made
20 aware of and witnessed a blind made of novel
21 one-way see-through mesh material in early 2021,"
22 is that incorrect?

23 A. No. This is the games you guys play as
24 attorneys. This is, in my mind, just absolute
25 crap. I was aware of the see-through technology.

1 I was able to actually experience myself and how
2 revolutionary, how impactful this technology would
3 be to the market. Like I said earlier, I've seen
4 maybe 10, 12 products that have come out that have
5 changed a category within a market. The Rugged
6 Cross solution to the see-through technology is a
7 revolutionary concept that I was blown away by.

8 Q. This turkey hunt in southern Ohio in 2021,
9 what blinds were you using?

10 A. I couldn't tell you, sir. You need to
11 know that I sit on the foundation board of the
12 National Wild Turkey Federation, so I'm involved in
13 a lot of conservation groups within the outdoor --
14 I also sit on our trade association, the ATA. So I
15 couldn't tell you what blind I was in, but I'm
16 pretty sure it was one of the Primos samples, and
17 it was a hub-style blind versus spring steel blind.

18 Dennis, have you ever sat in one of these
19 blinds yourself? Can I ask that?

20 Q. No, I get to ask the questions
21 unfortunately.

22 A. Okay. Well, I can tell you that if you
23 did, you would find out that sitting in a normal
24 blind that's blacked out, like I've sold for a long
25 time through Ameristep -- when you sit in a

1 see-through blind, it is crazy. The whole world
2 opens up to you. That was my -- in my mind, it
3 changed the market.

4 Q. I think I did something on my computer and
5 it kicked me out for a second. Can you hear me?

6 A. Yeah, I can hear you.

7 Q. Jay, are you represented by counsel here
8 today?

9 A. No. I'm wondering if I should be though.

10 Q. Is Mr. Wolter representing you?

11 A. No.

12 Q. So for purposes of the deposition, I'm
13 going to ask that you answer the questions that I
14 ask, and if Mr. Wolter wants to ask you other
15 questions, he has that ability, but I'd ask that
16 you simply answer the questions that I have --

17 A. You don't want to basically know the
18 truth, Dennis; correct? You don't want to know the
19 fact that the Rugged Cross design had a major
20 impact on the market in the see-through technology.
21 I'll answer your questions accordingly.

22 Q. For purposes of what we're doing here and
23 the mechanism, it's my opportunity to ask you
24 questions.

25 A. Sure, yeah.

1 Q. In your declaration, you state that the
2 one-way mesh satisfied a long-felt need; right?

3 A. Yes, sir.

4 Q. And at what point in time was that
5 long-felt need satisfied, in your opinion?

6 A. Ask the question again.

7 Q. At what point in time was that long-felt
8 need satisfied?

9 A. For me, the first time I sat in a blind
10 that had that technology.

11 Q. In 2021?

12 A. Yes.

13 Q. Had you ever seen the Rugged Cross blind
14 that was introduced at a trade show?

15 A. Not in detail, no. Not in detail. I
16 don't work for Rugged Cross.

17 MR. WOLTER: I'll object to the form of the
18 question and foundation.

19 BY MR. ABDELNOUR:

20 Q. When was the first time that you observed
21 a Primos SurroundView blind? Would that be the
22 2021 date?

23 A. Again, when is the last time you went
24 trick-or-treating for crying out loud? How the
25 hell can I tell you, looking at the amount of

1 products I look at on a daily basis exactly, when I
2 saw a particular product when I'm looking at
3 multiple products in a given week? So I couldn't
4 tell you exactly when. I can tell you this: When
5 I saw it -- and this is not what you want to hear.
6 When I saw it, I knew right away that it was
7 innovative, that it was going to change the market
8 given the opportunity.

9 Q. In paragraph 25 of your declaration, you
10 state that Outtech conducted research in 2021 on
11 trends in the ground blind market; right?

12 A. Yes, sir.

13 Q. And you state that based on the research,
14 everything was pointing to consumer demands for the
15 ground blind with the one-way see-through mesh;
16 correct?

17 A. Correct.

18 Q. Can you describe the research?

19 A. I've got employees, and what we do is we
20 look at certain categories, and we know our
21 business, and we saw the technology and were very
22 impressed by it. So at that point, if you want me
23 to continue because probably not in my best
24 interest but the interest of truth here, we
25 contacted Chris Seton at that point in time. I

1 jumped on an airplane with my partner. We flew
2 down and sat with Chris Seton and his brother and
3 talked to him about potentially receiving a license
4 to manufacture ground blinds.

5 Q. At the time you conducted research, did
6 you know that Rugged Cross had intellectual
7 property around this product?

8 A. That was the first question I asked him.

9 Q. What did he say?

10 A. He said they are patent pending or in the
11 midst of that. Again, I surround myself with good
12 accountants and good attorneys to make these kind
13 of decisions and discussions, but at that point,
14 Chris -- I felt very comfortable that they had done
15 their research and their homework. Dennis, I was
16 more concerned with the quality and the validity of
17 their product and if it's legitimate. Is it
18 something I can put the Outtech name and brand and
19 get involved in, and at that point, my answer was
20 emphatically yes, that I believe it was the
21 innovation. So I was brought down there with my
22 partners because that's my gig, right? I've been
23 to Africa half dozen times. I've been to Alaska 12
24 times. I've hunted around the world, and I felt
25 that the innovation that was shared with me was

1 revolutionary. Probably talking too much, but I
2 want the truth to come out.

3 Q. So ultimately, you entered into a license
4 agreement with Rugged Cross; correct?

5 A. Yes.

6 Q. Your declaration does not contain the
7 details of that license, correct?

8 A. Yeah. I would say that that's
9 proprietary, and it's something that if you want to
10 talk to my attorney about, I'd be happy to let you
11 do that, but I -- anyways, I'll just leave it
12 there.

13 Q. So the terms of the license are
14 proprietary, which is why they're not in your
15 declaration; fair?

16 A. Yes.

17 Q. And you didn't submit the actual license
18 agreement in connection with your declaration,
19 fair?

20 A. Yes.

21 Q. Is Outtech a manufacturer of hunting
22 blinds?

23 A. Actually we are and we have. I can
24 explain that to you if you want me to.

25 Q. Please explain. Sure.

1 A. Okay. We had ownership in a company
2 called Asian American Partners at the time, called
3 AAP. They are a fabric converter, and years ago,
4 we made ground blinds -- we represented -- Outtech
5 represented Ameristep, so we sold the Ameristep
6 product line when the hub-style and spring steel
7 blinds were introduced into the marketplace back in
8 the early '90s. We did 245, but Asian American
9 Partners that I just referred to, they are a fabric
10 converter. They convert fabric in Asia. They
11 actually entered into manufacturing ground blinds
12 for Ameristep at the time, and we built lots of
13 blinds for Ameristep for AAP, which I own 30
14 percent of that. We have since sold that business
15 several years ago because we no longer work for
16 Realtree. We work for Mossy Oak. We represent
17 Mossy Oak, which is a different camo pattern.

18 So did Outtech participate in the
19 manufacturing of ground blinds? Thousands of them,
20 thousands of them. Did I travel overseas for
21 ground blinds? Yes, several times.

22 Q. In your declaration, I think you
23 described -- let's see. In paragraph 3, you
24 describe Outtech as a sales and marketing
25 services -- as providing sales and marketing

1 services to manufacturers of outdoor products;
2 correct?

3 A. Correct.

4 Q. And you state, Outtech assists
5 manufacturing partners in designing and developing
6 new products; right?

7 A. Correct. An example, the game camera
8 market, we --

9 Q. Hold on. Let me ask a question. I want
10 to be specific here. Who are the manufacturers of
11 outdoor products to which Outtech provides sales
12 and marketing services to?

13 A. Sir, that's a ridiculous question. There
14 are probably 60 companies that we have done that
15 for in the 35 years. So companies like True
16 Glue (Phonetic), companies like GSM -- I have to
17 really list 40 or 50 different companies that --

18 Q. Let me try to be more specific. Can you
19 identify the manufacturers of outdoor products that
20 Outtech works with on hunting blinds specifically?

21 A. Ameristep and the Ameristep product line,
22 and I'm trying to recall any other blind companies
23 or anybody that we've been involved with. No, that
24 would be it as far as ground blinds go.

25 Q. Okay.

1 A. Tree stands, which is another division,
2 there are different companies.

3 Q. All right. Let's focus on hunting blinds,
4 and let me ask you this, and I'm taking it out of
5 paragraph 3. Which manufacturing partners has
6 Outtech worked with in designing and developing
7 products and specifically hunting blinds?

8 A. Ameristep.

9 Q. Any others?

10 A. No. It would be with Bob Ransom from
11 Ameristep, who is the founder and owner of
12 Ameristep until it got sold. We worked with him
13 for over 12 years, at least.

14 Q. So does Outtech sell hunting blinds
15 itself?

16 A. Yeah, we have. In other words, for our
17 manufacturers we represent, for Ameristep.
18 Currently right now, we are not in the ground blind
19 business today.

20 Q. Let me try to unpack that a little bit.
21 So do the hunting blinds that Outtech is involved
22 with selling, are they sold under different brand
23 names other than Outtech?

24 A. Outtech is not a brand. Outtech is a
25 company, so it's not a consumer-facing brand, so

1 you know.

2 Q. Okay. So Outtech is involved in the sale
3 of hunting blinds for its partner entities,
4 correct?

5 A. Yeah.

6 Q. And Ameristep is one of them, right?

7 A. Yes.

8 Q. For hunting blinds that are covered by the
9 Rugged Cross license, are there any other entities
10 that you're working with?

11 A. We represent a company called Millenium
12 that is not in the ground blind business, but we
13 have talked about helping them get in the ground
14 blind business, but currently, they are not in that
15 business. We've been approached by other
16 companies, Dennis, to represent them and decided to
17 pass on those opportunities.

18 Q. Which other companies have approached you?

19 A. The company out of Ohio that they have a
20 theater company in -- I believe it's who you
21 represent.

22 Q. DBR?

23 A. Yeah, what does that stand for? Is that
24 Dennis --

25 Q. Dan Reaser's company --

1 A. Yep, yep. We met with him, and in good
2 faith, he tried to hire us on multiple occasions.
3 We decided that he really wasn't the type of person
4 that we wanted to work with, and so it's kind of
5 ironic. My partner and I both looked at each other
6 and said, you know what? This doesn't feel right,
7 and so we passed, and that was several years ago.

8 Q. Any other entities?

9 A. No.

10 MR. WOLTER: Going to object to the form of the
11 question.

12 BY MR. ABDELNOUR:

13 Q. Does Outtech sell hunting blinds for
14 private labeling purposes?

15 A. No, not currently.

16 Q. Has it ever?

17 A. I don't know how I can even begin to
18 answer that honestly. Like I said, I've got a
19 hundred employees, guys that are pitching products.
20 Have they entered into discussions with a retailer
21 about potentially building a blind? I have no
22 idea, so I don't know how to answer that without
23 potentially perjuring myself, I guess.

24 Q. Well, let me try to be more specific so
25 it's narrower. Since 2021, has Outtech been

1 involved in working on private labeling of hunting
2 blinds that are covered by the Rugged Cross
3 license?

4 A. We've been currently developing technology
5 in the ground blind business to potentially bring
6 to market, but we have not brought those products
7 to market.

8 Q. Under what brand --

9 A. That's proprietary. I can't share that
10 with you.

11 MR. WOLTER: Objection. Beyond the scope of
12 his direct testimony.

13 BY MR. ABDELNOUR:

14 Q. I take it you're working with a partner
15 entity, and you don't have to tell me which one,
16 but you're working with somebody on this
17 development; fair?

18 MR. WOLTER: Again --

19 THE WITNESS: Honestly, the answer is not
20 really. We were doing it for ourselves with the
21 idea that we were going to find somebody if we
22 chose to move forward. Again, I feel like you're
23 leading me here.

24 BY MR. ABDELNOUR:

25 Q. I'm really just asking the question.

1 Let's go back to the Rugged Cross license. You
2 took this out in 2021, correct?

3 A. Yes.

4 Q. Which products are covered by the license?

5 MR. WOLTER: Object to the form of the
6 question.

7 THE WITNESS: Yeah, I would have to defer to my
8 team to answer that correctly.

9 BY MR. ABDELNOUR:

10 Q. Can you name any products covered by the
11 Rugged Cross license?

12 MR. WOLTER: Object to the form. Are you
13 referring to products that Outtech sells or
14 somebody else sells?

15 MR. ABDELNOUR: I'm referring to any
16 products --

17 BY MR. ABDELNOUR:

18 Q. Can you name any products that are covered
19 by the 2021 license you have with Rugged Cross?

20 MR. WOLTER: I'll object. It's been asked and
21 answered.

22 MR. ABDELNOUR: It hasn't been answered.

23 MR. WOLTER: You've already asked him if
24 they're making products. He said he's in the
25 process of developing products so they're under

1 the --

2 THE WITNESS: Dennis, we develop products with
3 innovative features and designs, and we will take
4 them to a manufacturer and say, hey, do you want to
5 bring this to market, and so I -- we're always,
6 always, every day, today, tomorrow, next week,
7 always looking at innovative products to bring to
8 market in the outdoor industry, and again, I'm not
9 trying to be adversarial, Dennis, at all. I'm
10 trying to answer your questions.

11 BY MR. ABDELNOUR:

12 Q. Let me try to break it down in different
13 pieces. Maybe that will be helpful. You testified
14 that your -- that you're in the process of
15 developing a product that might be covered by the
16 Rugged Cross hunting blind, correct?

17 A. Yes.

18 Q. Are there any products on the market sold
19 by either Outtech or anybody that they work with
20 that are covered by the license with Rugged Cross?

21 A. I don't think so, but I don't really -- to
22 the best of my ability, I would say there are not.

23 Q. Has Outtech paid Rugged Cross royalties
24 under this license?

25 A. No. We haven't manufactured a product.

1 Q. Does your license with Rugged Cross cover
2 the work that you're doing with Ameristep?

3 MR. WOLTER: Object to form.

4 THE WITNESS: I don't work for Ameristep, sir.
5 I don't have any involvement with Ameristep. I
6 worked with Ameristep for a lot of years, and then
7 it got bought by GSM, and at that point, they
8 decided to exit the category, so we resigned
9 Ameristep and went to work for another company
10 within 48 hours that I've already mentioned.
11 That's Millenium. So since the -- I couldn't even
12 tell you the date, but since Ameristep was
13 purchased by GSM, we worked for them for a short
14 period of time, and then that was it. We were
15 done.

16 BY MR. ABDELNOUR:

17 Q. Okay. Maybe I misunderstood that. So
18 since 2021, has Outtech done any work with
19 Ameristep?

20 A. No, but we worked with him prior to that
21 for, I'm going to say, probably 15, 20 years. I
22 mean, we worked for Ameristep for a long, long
23 time.

24 Q. Have you ever worked with Ameristep on a
25 blind that has one-way see-through mesh?

1 A. No.

2 Q. When we talk about these products, is your
3 expertise from the perspective of an engineer?

4 A. If you're asking me if I'm an engineer, I
5 am not an engineer, but I will tell you I've worked
6 with hundreds of engineers, and I do stand by the
7 fact that I believe I am an absolute expert when it
8 comes to these categories within the hunting
9 industry. It's why I have a house in Florida on
10 the ocean. It's why I have a log home in
11 Asheville, North Carolina and a beautiful home in
12 Aurora, Ohio is because I'm an expert, and I've
13 brought thousands of products, literally thousands
14 of products to market in the outdoor industry,
15 individual products. So yes, I do consider myself
16 an expert.

17 Q. You're not offering yourself as an
18 engineering expert, fair?

19 A. I don't know how to answer that because I
20 think I know more about what makes a proper ground
21 blind sellable in the market than any engineer, but
22 I don't have an engineering degree, which I've
23 already stated that, but do I consider myself an
24 expert on ground blinds? Absolutely. Probably in
25 the top five in the country. There's not very many

1 of us, and I've probably been involved -- you don't
2 want to hear this either, Dennis. My organization,
3 my company has probably been involved in more
4 ground blind sales than anybody in the world.
5 That's my sales, my 80 salesmen traveling the U.S.
6 calling on accounts.

7 Q. After you met with Chris Seton in 2021 at
8 the airport, how long after that did you consummate
9 the license agreement?

10 MR. WOLTER: I'll object to the (Inaudible).

11 THE WITNESS: I would say weeks. I don't know
12 exactly, but it was weeks. How long does it take
13 for you guys, an attorney, to write up an agreement
14 and go back and forth and back and forth so the
15 attorneys get paid? You know, it was probably
16 months, but I don't know that exactly.

17 By the way, in that time frame, Dennis --
18 BY MR. ABDELNOUR:

19 Q. What did you do --

20 A. Hold on one second. Let me finish.

21 Q. I think you already answered my question,
22 sir. I'm going to ask another one.

23 A. Okay.

24 Q. Between the time you met with Chris Seton
25 and the time that you signed the license agreement,

1 what diligence did you do concerning the
2 intellectual property?

3 A. You obviously don't know or understand
4 what I do for a living. Our due diligence is our
5 expertise, and entering into a category like this,
6 we would have every product sample, every item that
7 would pertain to that category my team would bring
8 in and we would review and look at. Again, part of
9 my answer would be when we first met with Chris
10 Seton and entered into that discussion, I was very,
11 very intrigued. As time went on, that
12 strengthened. I got more excited about the
13 technology.

14 Q. Are you familiar with Rugged Cross's
15 lawsuits against various manufacturers of hunting
16 blinds?

17 A. When you say familiar --

18 MR. WOLTER: Objection to --

19 THE WITNESS: -- what do you mean? Am I aware
20 that -- the industry is very small. Am I aware
21 that there's legal issues? Yeah. It's part of the
22 reason probably I'm not in the market right now is
23 because of you guys, right?

24 MR. WOLTER: Can I raise my objection? It's
25 beyond the scope, and you may want to rephrase that

1 or reask the question. I apologize.

2 BY MR. ABDELNOUR:

3 Q. I take it that you're aware that -- sorry.

4 Are you familiar with a company called
5 Outdoor Products, OPI?

6 A. I know of them.

7 Q. Are you familiar with a company called
8 FeraDyne?

9 A. Yes.

10 Q. What's your relationship with FeraDyne?

11 MR. WOLTER: Objection --

12 THE WITNESS: They're a competitor in the
13 marketplace. I know them, and they are a
14 manufacturing group that owns several different
15 brands in the outdoor industry, which we do not
16 represent.

17 BY MR. ABDELNOUR:

18 Q. Have you ever had any discussions with
19 anybody at FeraDyne regarding the Rugged Cross
20 patents or the lawsuits that I mentioned?

21 A. Absolutely not, a clear no.

22 Q. Have you ever had any discussions with
23 anybody at FeraDyne concerning hunting blinds
24 having one-way see-through mesh?

25 A. Absolutely not.

1 Q. Who do you know at FeraDyne?

2 MR. WOLTER: Object to form.

3 THE WITNESS: Well, a lot of them are no longer
4 there. They've gone through a great deal of
5 people, so I'm not going to bring up names. My
6 knowledge at FeraDyne is to say hi to the guys at a
7 trade show, shake their hands, and that's it.
8 That's the extent of it.

9 BY MR. ABDELNOUR:

10 Q. The folks you know at FeraDyne are no
11 longer there?

12 A. Some of the guys aren't there. I know
13 they've gone through a lot of turnover. They're a
14 competitor, sir.

15 Q. Are you aware that FeraDyne is taking the
16 position that the Rugged Cross patents are invalid?

17 MR. WOLTER: Object. Beyond the scope.

18 THE WITNESS: Am I aware of that? I believe I
19 am, that they're trying to fight the validity of
20 Chris Seton and his brother's patents, which
21 frankly is very sad, personally.

22 BY MR. ABDELNOUR:

23 Q. Why is that?

24 A. Why is that? It's an example of big money
25 coming into the outdoor industry where you've got

1 an ENT that spent time and money and countless
2 hours developing technology, improving it, and
3 making it absolutely spectacular, and other people
4 see the money involved, and so they want to jump
5 in, and they believe that they can beat these guys
6 down and wear them out through guys like yourself,
7 frankly. Chris Seton --

8 Q. (Inaudible) --

9 A. -- has built a very innovative item,
10 again. In my expertise, it is very, very
11 innovative, and I have not seen those type of
12 innovations, maybe 10 to 12 in my entire career,
13 which I stated earlier.

14 Q. Does your opinion that this is big money
15 and unfair, does that apply to DBR?

16 A. I don't understand what you're asking me.

17 MR. WOLTER: Object to the form of the
18 question.

19 THE WITNESS: Is this about big money? Yes, it
20 is, Dennis. Of course it is. That's why your firm
21 is getting paid and poor Dennis and his brother who
22 did all the labor and work and development, in my
23 mind, that's the problem with the U.S. Patent
24 Office today.

1 BY MR. ABDELNOUR:

2 Q. Can you be more specific? What's the
3 problem with the U.S. Patent Office?

4 A. No, I'm not going to be. I'm already
5 talking too much because I care too much about
6 what's right and what's wrong; right?

7 Q. Do you think that this proceeding is
8 wrong?

9 A. I think you're trying to gather
10 information to benefit your client, Dennis, and not
11 focusing on the fact that the outdoorsmen -- for
12 years and years and years, which I sold thousands,
13 probably more like millions of blinds over my time
14 with Ameristep that were blacked out inside. So
15 when you sit in them, you're feeling like you're in
16 a cave. It's claustrophobic. It's dark. You got
17 a little window that you see an animal, a turkey, a
18 deer walking in front of you, and you shoot. The
19 see-through technology allowed you, which I kind of
20 outlined with my grandson, that you can see the
21 wonderment of the outdoors. You can see squirrels
22 and chipmunks and see all that all the way around
23 you, and it's amazing. That's the impact that --
24 that's the story that should be told. Chris Seton
25 and his brother developed something that allowed

1 outdoorsmen to enjoy the outdoors, to appreciate
2 the outdoors, and for someone that's involved in
3 conservation and, again, National Turkey
4 Federation, it is a wonderment. It's an innovation
5 and allows older guys, as you get older -- I'm 65,
6 but as I get older, I won't be able to hunt out of
7 a tree saddle or a tree stand. I'll be hunting out
8 of a ground blind, and I will be hunting out of a
9 ground blind that's got see-through technology, and
10 again, that's why I'm here, Dennis, to tell the
11 truth.

12 Q. Mr. Scholes, what is the technology that
13 enables the one-way see-through feature?

14 A. I don't know the details behind it nor has
15 Chris Seton shared that information with me in
16 detail, but it's the -- I would say it's the layers
17 of how the screen is printed and the codings and
18 how light is transferred, but I got to tell you,
19 it's a wonderment to sit in a ground blind, which I
20 have and I will testify to this -- obviously I am
21 testifying to this -- where I've had a deer at ten
22 yards in front of me, and when the wind is right,
23 they have no idea you're there, and you feel like
24 you can reach out and they're right there. You can
25 see them very clearly, but they can't see you

1 and --

2 MR. WOLTER: For the record, I made an
3 objection --

4 MR. ABDELNOUR: Don't interrupt the answer
5 please. He's still talking.

6 THE WITNESS: No, I'm done.

7 MR. ABDELNOUR: Are you done?

8 THE WITNESS: Yeah, I am.

9 MR. ABDELNOUR: We've been going about 70
10 minutes. I'm going to suggest we take a ten-minute
11 break.

12 MR. WOLTER: Okay. Thank you.

13 (Whereupon, a short break was
14 taken.)

15 MR. ABDELNOUR: Back on the record please.

16 BY MR. ABDELNOUR:

17 Q. Mr. Scholes, welcome back. In your
18 declaration, you refer to long-felt need. What's
19 your understanding of what that means?

20 A. When a product comes to market, it
21 fulfills a need. It's explosive. The see-through
22 technology was a need in the marketplace that
23 improved the consumer hunting out of a ground
24 blind.

25 Q. Do you have an understanding of what

1 obviousness means in the context of a patent?

2 MR. WOLTER: Objection. Beyond the scope.

3 THE WITNESS: I can't answer that.

4 MR. ABDELNOUR: Okay. I have no further
5 questions.

6 MR. WOLTER: Give me a break, and then I'll
7 have a few questions, and then we can wrap it up
8 unless you have others beyond that. You okay with
9 that, Dennis?

10 MR. ABDELNOUR: That's all right.

11 (Whereupon, a short break was
12 taken.)

13 EXAMINATION

14 BY MR. WOLTER:

15 Q. Mr. Scholes, you referenced paragraph 22
16 of your declaration previously and referred to you
17 being aware and witnessed one-way see-through mesh
18 in 2021. Do you recall that testimony?

19 A. Uh-huh.

20 Q. Were you aware of the one-way see-through
21 mesh prior to 2021 used in ground blinds?

22 A. Yes.

23 Q. Was the reference in paragraph 22 your
24 first time to sit in a ground hunting blind with
25 one-way see-through mesh in an outdoor environment?

1 A. Yes, and again, Robert, I sat in blinds,
2 but when I was able to actually sit in a blind in a
3 hunting environment, it was amazing. It was
4 amazing. That was the aha moment for me.

5 Q. And what game were you hunting at the
6 time?

7 A. White-tailed deer and turkey in Central
8 Ohio.

9 Q. And what advantage does the one-way
10 see-through mesh on a ground blind have over ground
11 blinds that do not have the one-way see-through
12 mesh?

13 MR. ABDELNOUR: Objection. Form, outside the
14 scope.

15 THE WITNESS: Well, again, sitting in a black
16 ground blind is no fun. There's no enjoyment of
17 the outdoors. You're there basically to harvest an
18 animal. The see-through technology allows you to
19 really truly enjoy the wonderment of the outdoors,
20 which is a game changer hunting out of a ground
21 blind. I believe, Robert, more people will hunt
22 out of see-through technology going forward --
23 they'll hunt out of a ground blind because of
24 see-through technology. There will be more people
25 that will want to hunt out of a ground blind versus

1 sitting in a black shell.

2 BY MR. WOLTER:

3 Q. Mr. Abdelnour referred to your declaration
4 and some research. Did Outtech conduct some level
5 of research regarding one-way see-through blinds?

6 A. We did. It's proprietary, but we did. My
7 team conducted a consumer survey asking about
8 ground blinds, the technology, what consumers would
9 want as far as features and benefits in a ground
10 blind, and it was very enlightening.

11 Q. Who conducted the survey?

12 A. We contracted with a company that did that
13 that we have an association with that we use all
14 the time.

15 Q. Do you have any idea how many consumers
16 were subject to that survey?

17 A. Robert, I can get you specifics, but there
18 were thousands.

19 Q. And what were the results of that survey
20 as it relates to one-way see-through mesh?

21 MR. ABDELNOUR: Objection. Form.

22 THE WITNESS: Unequivocal, that the consumers
23 wanted this technology, needed this technology, and
24 it would result in increased sales and
25 participation by the hunter in the outdoors. More

1 people will hunt out of a ground blind with
2 see-through technology than without it.

3 MR. WOLTER: Okay. I have no further
4 questions.

5 MR. ABDELNOUR: Nothing.

6 MR. WOLTER: The witness would like to read.

7 MR. ABDELNOUR: I will be ordering.

8 MR. WOLTER: I'll take a copy please.

9 (Deposition concluded at
10 10:33 a.m.)
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UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

DBR FINANCE, INC.,)
Petitioner,)
vs.) No. IPR2024-00291
RUGGED CROSS HUNTING)
BLINDS, LLC,)
Patent Owner.)

I, JAY SCHOLLES, being first duly sworn, on
oath say that I am the deponent in the aforesaid
deposition taken on November 1, 2024; that I have
read the foregoing transcript of my deposition, and
affix my signature to same.

JAY SCHOLLES

Subscribed and sworn to
before me this day
of , 2024

NOTARY PUBLIC

1 STATE OF ILLINOIS)

2) SS:

3 COUNTY OF C O O K)

4 I, Rebecca Boyce, an Illinois Shorthand
5 Reporter, do hereby certify that heretofore,
6 to-wit, on November 1, 2024, JAY SCHOLES appeared
7 virtually before me in a cause now pending and
8 undetermined in the United States Patent and
9 Trademark Office Before the Patent Trial and Appeal
10 Board, wherein DBR FINANCE, INC. is the Petitioner,
11 and RUGGED CROSS HUNTING BLINDS, LLC is the Patent
12 Owner.

13 I further certify that the said
14 JAY SCHOLES was first duly sworn to testify the
15 truth, the whole truth and nothing but the truth in
16 the cause aforesaid; that the testimony then given
17 by said witness was reported stenographically by me
18 in the presence of the said witness, and afterwards
19 reduced to typewriting by Computer-Aided
20 Transcription, and the foregoing is a true and
21 correct transcript of the testimony so given by
22 said witness as aforesaid.

23 I further certify that the signature to
24 the foregoing deposition was reserved by counsel
25 for the respective parties and that there were

1 present at the deposition the attorneys
2 hereinbefore mentioned.

3 I further certify that I am not counsel
4 for nor in any way related to the parties to this
5 suit, nor am I in any way interested in the outcome
6 thereof.

7 IN TESTIMONY WHEREOF: I have hereunto set
8 my hand this day of November, 2024.

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13 ILLINOIS SHORTHAND REPORTER,
14 COOK COUNTY, ILLINOIS
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