

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

DBR FINANCE, INC.,	)	
	)	
Petitioner,	)	Inter Partes Review
	)	No.: IPR2024-00291
vs.	)	
	)	
RUGGED CROSS HUNTING	)	
BLINDS, LLC,	)	
	)	
Patent Owner.	)	
_____	)	
	)	
Patent 11,399,535	)	
	)	
Filing Date: June 11, 2021	)	
Issue Date: August 2, 2022	)	
	)	
Title: CAMOUFLAGE	)	
MATERIAL, FOR A HUNTING	)	
BLIND	)	

DEPOSITION OF ROBERT RANSOM
APPEARING REMOTELY FROM
GENESEE COUNTY, MICHIGAN

October 30, 2024

9:02 a.m. CDT

REPORTED BY:

Suzanne Thalji

CSR No. 084-002337

APPEARING REMOTELY FROM COOK COUNTY, ILLINOIS

Robert Ransom
June 11, 2021

1 REMOTE APPEARANCES: 2 HONIGMAN LLP 3 BY MR. DENNIS J. ABDELNOUR 4 155 North Wacker Drive, Suite 3100 5 Chicago, Illinois 60606 6 312.701.9300 7 dabelnour@honigman.com 8 9 - and - 10 11 ESCHWEILER & POTASHNIK LLC 12 BY MR. THOMAS ESCHWEILER 13 195 South Main Street, Suite 400 14 Akron, Ohio 44308 15 216.502.0600 16 teschweiler@epiplaw.com 17 on behalf of the Petitioner; 18 WOLTER VAN DYKE DAVIS PLLC 19 BY MR. ROBERT L. WOLTER 20 MR. JEFFERSON DEERY 21 1900 Summit Tower Boulevard, Suite 140 22 Orlando, Florida 32810 23 407.926.7700 24 rwolter@savvyiplaw.com on behalf of the Patent Owner.	Page 2 Page 4 1 REPORTED REMOTELY FROM COOK COUNTY, ILLINOIS 2 WEDNESDAY, OCTOBER 30, 2024, 9:02 A.M. CDT 3 (Witness sworn.) 4 ROBERT RANSOM, 5 having been first duly sworn, was examined and 6 testified as follows: 7 DIRECT EXAMINATION 8 BY MR. ABDELNOUR: 9 Q. Good morning. Please state your name 10 and address for the record. 11 A. Robert Ransom, 8058 West Coldwater 12 Road, Flushing, Michigan 48433. 13 Q. Where do you work? 14 A. Primal Outdoors. 15 Q. What is your job title? 16 A. President. 17 Q. Mr. Ransom, have you been deposed 18 before? 19 A. Yes. 20 Q. How many times? 21 A. Six, seven. 22 Q. Ever in connection with a patent case? 23 A. Yes. 24 Q. All of them in connection with a patent
1 I N D E X 2 WITNESS 3 ROBERT RANSOM 4 EXAMINED BY PAGE 5 MR. ABDELNOUR 4 6 MR. WOLTER 68 7 E X H I B I T S 8 RANSOM DEPOSITION EXHIBITS PAGE 9 Exhibit 1 57 10 Exhibit 2 63 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Page 3 Page 5 1 case? 2 A. No, very few. 3 Q. Tell me about the patent case you were 4 involved in. 5 A. Had to do with a chair blind. 6 Q. When was this? 7 A. My guess would be 2005 to 2007 range. 8 Q. Where were you working at the time? 9 A. Ameristep. 10 Q. Who owned the patent? 11 A. I don't recall the gentleman's name. 12 Q. Ameristep was the defendant, I take it? 13 A. Yes. 14 Q. How did that case wrap up? 15 A. We settled with them. 16 Q. Did you testify at trial in court or 17 just in a deposition? 18 A. Just in a deposition. 19 Q. Was Ameristep taking the position that 20 the patent that was being asserted against it was 21 invalid? 22 A. Yes. 23 Q. Was it taking the position that it was 24 not infringed?

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Page 6 1 A. Yes. 2 Q. When were you last deposed? 3 A. 2012 maybe. 4 Q. So it's been some time? 5 A. Yes. 6 Q. Let me just run over the ground rules 7 so we're all on the same page. You understand you 8 are under oath, correct? 9 A. Correct. 10 Q. I am going to ask questions, and you 11 understand that you have to answer those 12 questions? 13 A. Yes. 14 Q. Because we've got a court reporter and 15 this is going to be transcribed, do me a favor and 16 let's do our best to make sure all your answers 17 are audible. Fair enough? 18 A. Yes. 19 Q. Your counsel -- sorry. I will get to 20 that in a second. Mr. Wolter, who is counsel for 21 Rugged Cross, I take it may object, but 22 nevertheless even if he lodges an objection, you 23 understand you have to provide an answer? 24 A. Yes.	Page 8 1 IPR No. 2024-00291; is that correct? 2 A. Yes. 3 Q. Now, are you being represented by 4 counsel today? 5 A. Yes. 6 Q. Are you being represented by 7 Mr. Wolter? 8 A. No, I'm not being represented. I'm 9 being deposed. I'm sorry. 10 Q. And that's sort of where I'm getting 11 at. So Rugged Cross has counsel in this case. 12 You understand that? 13 A. Yes. 14 Q. And that's Mr. Wolter and his firm? 15 A. Yes. 16 Q. Do you have your own counsel 17 representing you in this case? 18 A. No. 19 Q. Is Mr. Wolter representing you? 20 A. No. 21 Q. I am going to share my screen here so 22 that we can all see. Okay. What I have put in 23 front of you, Mr. Ransom, is the front page of a 24 declaration titled "DECLARATION OF ROBERT M.
Page 7 1 Q. If you don't hear a question, ask me to 2 restate it or ask it again. Fair enough? 3 A. Fair. 4 Q. If you don't understand a question, 5 please let me know, and I'll try to make sure that 6 I ask a question that you understand. Fair 7 enough? 8 A. Yes. 9 Q. If you do answer, can we all assume 10 that you understood the question and heard the 11 question? 12 A. Yes. 13 Q. Is there any reason you cannot give 14 complete, truthful, and accurate testimony today? 15 A. No. 16 Q. For example, you are not under any 17 medication, correct? 18 A. No. 19 Q. You're familiar with the Patent Office 20 dispute between Rugged Cross and DBR, yes? 21 A. Yes. 22 Q. You understand that you have provided 23 declaration testimony in support of the patent 24 known to Rugged Cross in this IPR, which is	Page 9 1 RANSOM IN OPPOSITION TO PETITION FOR INTER PARTES 2 REVIEW OF U.S. PATENT NO. 11,399,535." Do you see 3 that? 4 A. I do. 5 Q. And at the bottom this is labeled 6 Exhibit 2034, 2034. Do you see that? 7 A. Yes. 8 Q. And this is in connection with IPR 9 No. 2024-00291, correct? 10 A. Yes. 11 Q. Is this your declaration, sir? 12 A. Yes. 13 MR. WOLTER: I will object to the form 14 of the question. 15 BY MR. ABDELNOUR: 16 Q. I am going to go to the last page. 17 This is page 26 of the declaration. Are you with 18 me? 19 A. Yes. 20 Q. And there is a signature, and it is 21 dated September 5, 2024. Do you see those? 22 A. Yes. 23 Q. Is that your signature? 24 A. Yes.

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1 Q. And did you sign this on September 5,
2 2024?
3 A. Yes.
4 Q. Does this declaration contain all of
5 the testimony that you intend to provide in
6 support of Rugged Cross in this case?
7 A. Yes.
8 Q. Is your declaration to your knowledge
9 sitting here today accurate?
10 A. Yes.
11 Q. And you have made this declaration
12 under penalty of perjury, correct?
13 A. Correct.
14 Q. Is there anything in here that needs to
15 be corrected?
16 A. No.
17 Q. Mr. Ransom, how did you get involved in
18 this IPR?
19 A. Well, I met Chris Seaton quite some
20 time ago, and we had a discussion, and I took a
21 license with him for his intellectual property.
22 Q. I think in your declaration you say
23 that was in 2021, right?
24 A. Yes, sir.

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1 Q. Let me step back. My question was a
2 little bit different, and that is how did you get
3 involved in connection with this IPR, which is
4 this Patent Office proceeding?
5 A. I guess I'm being used as an expert
6 witness.
7 Q. When did you first hear about this IPR?
8 Who first approached you?
9 A. Chris.
10 Q. When was that?
11 A. I could only guess.
12 Q. Well, your declaration is signed in
13 September 2024. I take it it was within some
14 months before that?
15 A. Yes.
16 Q. When Chris first approached you to ask
17 you to become involved, what did he say to you?
18 MR. WOLTER: Object, lack of
19 foundation.
20 MR. ABDELNOUR: You can answer.
21 A. He just described -- well, I went to
22 Chris. I went to Chris because I have a license
23 with Chris, and I asked him what was going on with
24 the situation at hand.

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1 Q. Okay. And then what did Chris say?
2 When we say "Chris," we are talking about Mr. --
3 A. Seaton.
4 Q. Chris Seaton, okay.
5 A. Yeah, yeah.
6 Q. What did Mr. Seaton say?
7 A. He's working on defending his patent.
8 Q. What else was said?
9 A. That was pretty much about it, you
10 know. He's going to defend his patent, and then
11 at that point I really didn't have much more to
12 say.
13 Q. And at that time did he ask you to
14 prepare a declaration in support of his --
15 A. No.
16 Q. -- IPR?
17 A. No.
18 Q. When did that -- later?
19 A. Yes, much later.
20 Q. Okay. So when was the discussion when
21 you first approached Mr. Seaton about his patent
22 and defending his patent? When was that?
23 A. Probably about our first discussion.
24 Q. In 2021?

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1 A. Very early on, yes, very early on.
2 Q. Would this have been before or after
3 you had taken a license?
4 A. I might not understand the question.
5 When you're asking me about the declaration, that
6 happened much further down the road in time than
7 when I first met Chris.
8 Q. Why don't we do this. Let's start from
9 the beginning, and we can work our way
10 chronologically. That might be easier.
11 When did you first become aware of
12 Rugged Cross's patents, including this '535
13 patent?
14 A. Probably 2019, 2020.
15 Q. How did you become aware?
16 A. Word of mouth.
17 Q. Can you be more specific?
18 A. We have mutual friends.
19 Q. And when did you first have any
20 interaction with anybody at Rugged Cross?
21 A. It was Chris Seaton, and I would guess
22 in the 2019, 2020 time frame.
23 Q. And what was that first interaction?
24 A. Chris called me up and informed me that

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Page 14 1 he has a patent and he would like me to take a 2 license. 3 Q. Now, where were you working at the 4 time? 5 A. Primal Outdoors. 6 Q. Primal, okay. And so he wants Primal 7 to take a license, right? 8 A. That's correct. 9 Q. And was Primal selling products that he 10 believed were covered by his patent at the time? 11 A. Yes. 12 Q. What products did he suggest were 13 covered by his patent? 14 A. Specific products? 15 Q. Yes. 16 A. At the time we had a blind called the 17 Wraith. 18 Q. Spell that. 19 A. W-r-a-i-t-h. 20 Q. And did Mr. Seaton suggest that the 21 Wraith was covered by his patent? 22 A. He did. 23 Q. Were there other products that he 24 suggested were covered by his patent?	Page 16 1 didn't feel I needed to pay anyone for the 2 technology. 3 Q. Why did you feel that way? 4 A. I don't -- I don't know. I don't know. 5 I just didn't want to take a license. 6 Q. Had you asked your attorneys to take a 7 look at Mr. Seaton's assertion that the Wraith 8 product was covered by his patent? 9 MR. WOLTER: Object to form. 10 A. After the second phone call, I 11 instructed my attorney to look into his patent. 12 BY MR. ABDELNOUR: 13 Q. Did you believe that the Wraith product 14 was covered by the Rugged Cross patent? 15 A. I did not know. 16 Q. And so you didn't want to pay a license 17 for that product, correct? 18 A. Yes. 19 Q. Was the Wraith a pop-up hunting blind? 20 A. I call it a hub style blind. 21 Q. Hub style blind. 22 A. It could also be called a pop-up blind, 23 but I call it a hub style blind. 24 Q. Did it have mesh panels?
Page 15 1 A. No, he did not. 2 Q. And how did you respond to his 3 suggestion that you should take a license? 4 A. I put him off. 5 Q. Can you be more specific? 6 A. I told him we would take -- I would 7 take his input into consideration and go from 8 there. 9 Q. Did you get your lawyers involved at 10 that time? 11 A. Not at that time. 12 Q. All right. When was the next 13 interaction with Mr. Seaton or anybody at Rugged 14 Cross? 15 A. Probably about six months after that. 16 Chris called me back. 17 Q. What did Chris say when he called you 18 back? 19 A. He asked me, you know, about putting 20 together a license. 21 Q. And how did you respond at that time? 22 A. I told him I wasn't interested. 23 Q. Why? 24 A. Because at the time I didn't -- I	Page 17 1 A. Yes. 2 Q. Did it have camouflage on the mesh? 3 A. Yes. 4 Q. Was one side of the mesh -- the other 5 side of the mesh that wasn't camo, did it have a 6 single color, dark color? 7 A. It was black. 8 Q. Okay. So why in your opinion was the 9 Wraith not covered by Rugged Cross's patent? 10 A. I didn't have any idea about Chris's 11 patent. I'm not a patent attorney, and I'm not a 12 person that can evaluate a patent and decide 13 whether or not I need to take a license. 14 Q. So was your opinion that you didn't 15 need a license based on your legal counsel? 16 A. Yes. 17 Q. You were advised that the Wraith -- 18 MR. WOLTER: Well, I am going to 19 object. I know I am not representing this 20 client, but communications between Mr. Ransom 21 and his attorney are privileged 22 communications between an attorney and 23 client. 24 MR. ABDELNOUR: You are not

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Page 18 1 representing Mr. Ransom. You can make an 2 objection for the record. You cannot 3 instruct the witness -- 4 MR. WOLTER: I didn't instruct him 5 anything. I'm just explaining. I made an 6 objection and explained where this 7 questioning was going. 8 MR. ABDELNOUR: I understand, and I 9 don't want any -- 10 MR. WOLTER: I did not instruct 11 Mr. Ransom to answer or not answer. 12 MR. ABDELNOUR: Okay. That's fine. 13 Please, you can make your objections for the 14 record. You are not representing Mr. Ransom, 15 and you can't instruct the witness while 16 we're on the record or while we're off the 17 record. 18 MR. WOLTER: As I explained, I made an 19 objection. I did not instruct him, and I 20 told you I was not representing him. 21 MR. ABDELNOUR: Suzanne, is there a 22 question pending? Can you read it back, 23 please. 24	Page 20 1 your attorney's advice. Was your attorney saying 2 that you needed a license or that you didn't need 3 a license? 4 A. He told me that I needed to take a 5 license. 6 Q. What was the date of that? 7 A. Well, 2021. 8 Q. Turn to paragraph 5 of your 9 declaration, please. 10 A. Okay. 11 Q. In paragraph 5 you state that, "With 12 respect to the hub-style blind we," Primal, "sell 13 five different models." Do you see that? 14 A. Yes. 15 Q. "Three of the hub-style blind models 16 that Primal sells include one-way see-through mesh 17 window panels," and it goes on. Do you see that? 18 A. Yes. 19 Q. And in paragraph 6 you identify the 20 blinds Primal sells that include this mesh 21 material are the Vision 270, the Harvester 270, 22 and the Outlook 270. Do you see that? 23 A. Yes. 24 Q. I didn't see in your declaration any
Page 19 1 (Record read as follows: 2 "Q You were advised that the 3 Wraith --") 4 BY MR. ABDELNOUR: 5 Q. I don't want to know what your lawyers 6 told you in terms of the substance or the details, 7 but were you relying upon your lawyer's counsel 8 that the Wraith product was not covered by the 9 Rugged Cross patent? 10 A. Upon turning it over to my attorney, I 11 took the license. 12 Q. Okay. Now you have confused me -- 13 A. Yeah. Okay. Sorry. 14 Q. -- because I thought you had said that 15 your view was the Wraith was not covered by the 16 Rugged Cross patent. 17 A. That was my thinking going into it. I 18 didn't want to -- I didn't want to take a license. 19 Q. Okay. 20 A. So my first response is I don't need to 21 take a license. Then when Chris kept -- when 22 Chris was persistent, I turned it over to my 23 attorney. 24 Q. I see. And then you were relying upon	Page 21 1 discussion of the Wraith. 2 A. The Wraith was the first -- the Wraith 3 was the first blind we came out with that used the 4 fabric in question. 5 Q. When did you come out with the Wraith? 6 A. 2020, 2019, 2019 maybe. 2019 would 7 probably be a more accurate answer. 8 Q. And the Wraith used one-way see-through 9 mesh, correct? 10 A. Yes. 11 Q. And when you came out with the Wraith, 12 were you aware of Rugged Cross? 13 A. No. 14 Q. Were you aware of Rugged Cross's 15 patent? 16 A. No. 17 Q. Did Primal copy Rugged Cross's product 18 when it was designing the Wraith? 19 A. No. 20 Q. Did Primal copy Rugged Cross's patent 21 when it was designing the Wraith? 22 A. No. 23 Q. How is it that Primal was able to 24 develop a hub style blind with one-way see-through

Page 22 1 mesh without knowledge of Rugged Cross's 2 invention? 3 A. It was the hottest thing in the 4 marketplace. 5 Q. But my question is a little bit 6 different. How was Primal able to design a hub 7 style blind with one-way see-through mesh if it 8 wasn't aware of Rugged Cross's products or patent? 9 A. Went to the ATA show, Archery Trade 10 Association. 11 Q. And why are you identifying that show? 12 What is the significance -- 13 A. Just because that's where -- that's 14 where I -- it was around that time that I became 15 aware of this fabric, the one-way see-through 16 mesh, and it was the talk of the show. 17 Q. What year was that? 18 A. I want to guess 2018, 2019. 19 Q. And what products were being displayed 20 using this one-way mesh? 21 A. I know for a fact Double Bull had it. 22 Double Bull had it the first time I saw it. 23 Q. And Double Bull is Primos, right? 24 A. Correct.	Page 24 1 Q. When relative to the license that you 2 took? 3 A. I took the license prior to knowing or 4 understanding of any lawsuits. 5 Q. And since learning of the lawsuits, 6 have you had any discussions with Rugged Cross 7 about the patents? 8 A. No. I mean, other than there's -- they 9 were, you know -- any discussions might include 10 continuations. 11 Q. What is that? 12 A. Oh, they're just the -- just applying 13 for additional coverage. 14 Q. So Rugged Cross would inform you when 15 they are applying for additional patent coverage? 16 A. It was a discussion Chris and I had. 17 Q. And what was the nature of the 18 discussion? What was said? 19 A. Chris informed me that they had 20 received more claims, and that was it. 21 Q. What was your response? 22 A. Great. 23 Q. Anything else? 24 A. No.
Page 23 1 Q. In designing the Wraith, did Primal 2 copy the Primos Double Bull blind? 3 A. We used the same window coverings that 4 they were using. I looked at what they were 5 doing, and we mimicked that. 6 Q. Now, in your declaration you say that 7 Primal entered into a nonexclusive license with 8 Rugged Cross in July of 2022; is that correct? 9 A. Yes. 10 Q. And then when did you first become 11 aware of lawsuits involving these patents, the 12 Rugged Cross patents? 13 A. Boy -- 14 MR. WOLTER: I'll object to being 15 outside the scope, but as Dennis has said, 16 please answer. 17 A. Could you repeat the question, please. 18 BY MR. ABDELNOUR: 19 Q. Sure. Let me ask it this way. Are you 20 aware of lawsuits involving Rugged Cross patents? 21 A. Yes. 22 Q. When did you first become aware of 23 those lawsuits? 24 A. Two years ago.	Page 25 1 Q. When did you first become aware of this 2 IPR? Actually, let me back up. Do you understand 3 that an IPR is a challenge to the validity of the 4 '535 Rugged Cross patent? 5 A. Yes. 6 Q. When did you first become aware of this 7 IPR proceeding? 8 A. A year ago. 9 Q. How did you become aware of it? 10 A. Chris informed me. 11 Q. What did Chris say about it? 12 A. He said they're going to work cleaning 13 up the marketplace. 14 Q. What does that mean? 15 A. That means that there's a lot of 16 infringers in the marketplace, and he's going to 17 defend his patent. 18 Q. And you said that was about a year ago? 19 A. Probably two years ago. 20 Q. How did you respond? 21 A. Great. 22 Q. Anything else? 23 A. No. 24 Q. How did this declaration you have

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1 submitted come to be? Who asked you to put a
2 declaration together?
3 A. I don't recall if it was Chris or
4 Robert.
5 Q. One of Chris or Robert contacted you
6 and asked if you would prepare a declaration?
7 A. Yes.
8 Q. And what was said about the
9 declaration?
10 A. Just to put together my history of what
11 I -- of my knowledge of the marketplace, the
12 history that I have, the experience I have with
13 ground blinds and then of course pertaining
14 specifically to my experience with the one-way
15 see-through fabric.
16 Q. And you agreed to do that?
17 A. Yes.
18 Q. How much time did you put into
19 preparing your declaration?
20 A. Oh, a couple hours.
21 Q. Two?
22 A. Call it three.
23 Q. Three hours. And how were you
24 compensated for your time?

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1 A. I was not compensated for my time.
2 Q. Are you being compensated for your time
3 today?
4 A. No.
5 Q. How did the declaration come to be
6 prepared? Did you write the first draft?
7 A. Yes.
8 Q. Did anybody edit the declaration other
9 than you?
10 A. No.
11 Q. Top to bottom, it's just you?
12 A. Well, I put together a rough draft and
13 then turned it in, and then we discussed it.
14 Q. Turned it in to who, Robert Wolter?
15 A. Yes.
16 Q. And then you discussed it with
17 Mr. Wolter?
18 A. Yes.
19 Q. And did Mr. Wolter or his firm suggest
20 changes to your declaration?
21 A. No.
22 Q. Did they redline edit your declaration?
23 A. No. We talked about what certain
24 things meant, and we clarified -- because I get

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1 to -- I get to rolling with industry lingo, and if
2 Robert helped me with anything, it was just
3 possibly helped to clarify what it is I was trying
4 to convey.
5 Q. How did you prepare for your deposition
6 today?
7 A. I had discussion with Robert prior to.
8 Q. When? When was that discussion?
9 A. Monday.
10 Q. How long did you discuss with
11 Mr. Wolter?
12 A. Twenty minutes.
13 Q. And what was said?
14 A. We just talked about the deposition I
15 was going to need to give and just pretty
16 straightforward. Answer the questions. Answer
17 the questions truthfully. Don't worry about
18 anything other than telling the truth, I guess.
19 Q. Okay. Did you discuss the substance of
20 your declaration?
21 A. No.
22 Q. Other than your discussion with
23 Mr. Wolter, did you do anything else to prepare
24 for the deposition today?

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1 A. I read over my declaration.
2 Q. Anything else?
3 A. No.
4 Q. Your declaration contains background
5 information about your career and about your work
6 in the outdoor industry, correct?
7 A. Correct.
8 Q. Are you offering yourself as an expert
9 witness in this case?
10 A. Yes.
11 Q. Are all of the credentials and
12 qualifications upon which you intend to rely as an
13 expert witness contained in your declaration?
14 A. Yes.
15 Q. What is the expert opinion that you
16 formulated and wish to offer the Patent Office in
17 this case?
18 A. I'm sorry. Can you repeat the
19 question? I'm not following.
20 Q. If you are offering testimony as an
21 expert, then did you do analysis and reach an
22 opinion or a conclusion?
23 A. Yes.
24 Q. Okay. And what is that conclusion that

Page 30 1 you're offering? 2 A. My answer would be when you hunt, you 3 want to be concealed as much as possible, and this 4 fabric offers a tremendous advantage to allowing 5 you to remain concealed at all times. 6 Q. Is your opinion based upon your 7 personal observations and experience in the 8 industry? 9 A. And in the woods. My personal 10 observation of -- my experience -- I have hunted 11 my entire life, spent my entire life in the 12 outdoors, and of my professional opinion, I've 13 spent my entire life marketing and selling in the 14 industry, and that's my conclusion. 15 Q. And so outside of that experience that 16 you have described, did you do any other analysis 17 on which you base your opinion? 18 A. No. 19 Q. Okay. Are you offering yourself as an 20 expert in materials? 21 A. No. 22 Q. Are you offering yourself as an expert 23 in material science? 24 A. No.	Page 32 1 design of textiles or fabrics? 2 A. Yes. 3 Q. Explain. 4 A. We came out with several patents for 5 ground blinds while I owned Ameristep, and we made 6 ground blinds many different ways, with many 7 different window shapes and configurations, and, 8 you know, we have come out and marketed several 9 different types of fabrics, several different 10 types of camo, several different types of 3-D 11 elements to help conceal the hunter, help hide the 12 blind, help conceal the blind, and then what I 13 would call shoot-through mesh. Our windows in our 14 blinds have shoot-through mesh on a lot of them. 15 Q. Do you have any financial interest or 16 other interest in the outcome of this IPR? 17 A. No. 18 Q. Do you have any interest, financial or 19 otherwise, in the '535 patent? 20 A. No, other than I have a license. 21 Q. Would you agree with me that you would 22 benefit from the validity of these patents by 23 virtue of Rugged Cross's ability to keep others 24 out of the market?
Page 31 1 Q. Are you offering yourself as an expert 2 in textiles? 3 A. No. 4 Q. Are you offering yourself as an expert 5 in fabric? 6 A. No. 7 Q. Are you offering yourself as an expert 8 in mesh fabric? 9 A. No. 10 Q. Are you offering yourself as an expert 11 in methods of manufacturing textiles for use in 12 hunting blinds? 13 A. No. 14 Q. Do you have any background, whether it 15 be educational or work experience, in any of the 16 areas I just mentioned, for example, textiles? 17 A. Yes. 18 Q. And what would that be? 19 A. We started manufacturing and marketing 20 blinds in '98, and so I've been involved in 21 creating blinds since 1998. 22 Q. Outside of creating blinds -- let me 23 ask you in a different way. 24 Do you have any experience in the	Page 33 1 A. Yes. 2 Q. And that would include DBR, for 3 example? 4 A. Yes. 5 Q. Let's turn to pop-up blinds. You 6 described some level of history of pop-up blinds 7 in your declaration, right? 8 A. Yes. 9 Q. And you testified that the basic 10 structural design of a pop-up blind was first 11 introduced in 1996, correct? 12 A. No, no. I refer to a pop-up blind as a 13 spring steel blind. I refer to a hub style blind 14 as a hub style blind. 15 Q. Okay. Can you explain the difference 16 for me between a hub style blind and a pop-up 17 blind? 18 A. A pop-up blind is -- the structure is 19 made out of band steel, and as a result, it can 20 fold right into itself. And it curls right up, 21 and it looks like a drum cymbal when it's in its 22 case. And when you take the pop-up blind out, it 23 virtually explodes into place. 24 And a hub style blind is, for the most

Page 34 1 part, a five -- most blinds in the market are 2 five-hub blinds. You've got a roof hub and four 3 wall hubs that pull out and pop open, snap open 4 into position, and that's what I refer to as a hub 5 style blind. 6 Q. So a hub style blind is one type of a 7 pop-up blind, fair? 8 A. Fair. 9 Q. Okay. Now, hub style blinds have been 10 around since the Double Bull blind in 1996, right? 11 A. Correct. 12 Q. And that's your testimony, for example, 13 at paragraph 33 of your declaration? 14 A. Yes. 15 Q. And the basic design and structure of 16 the hub style blind has not changed since 1996, 17 correct? 18 A. Correct. 19 Q. And that's true as of today, right? 20 A. Correct. 21 Q. I take it since the beginning, hub 22 style blinds have used camouflage material, right? 23 A. Yes. 24 Q. At paragraph 44 you state that	Page 36 1 Q. That's okay. Let me try it a different 2 way. 3 At paragraph 50 of your declaration, 4 you describe a hub style blind called the Den, 5 correct? 6 A. Yes. 7 Q. And you state that it has a window 8 configuration similar to what had been used in the 9 past, right? 10 A. Correct. 11 Q. Including the time frame leading up to 12 the year 2015, right? 13 A. Yes. 14 Q. When was the Den first introduced in 15 the market? 16 A. The Den was first introduced 2018. 17 Q. The Den was introduced in 2018? 18 A. Yes. It might have been 20 -- yes, 19 2018. 20 Q. And did the Den incorporate one-way 21 see-through mesh? 22 A. No. 23 Q. I guess I'm not understanding why you 24 are discussing the Den in paragraph 50.
Page 35 1 initially the blinds did not include any mesh 2 material. It's the last sentence. Do you see 3 that? 4 MR. WOLTER: Excuse me. What paragraph 5 are you on, Dennis? 6 MR. ABDELNOUR: Forty-four. 7 A. Correct. 8 Q. But I take it hub style blinds started 9 to use mesh sometime shortly after their 10 introduction? 11 A. Correct. 12 Q. When? 13 A. When we started coming out with blinds 14 in -- I want to say we started in like 2000. 15 Q. "We" being Ameristep? That was you at 16 the time? 17 A. Yes, yes. 18 Q. So in 2000 Ameristep had hub style 19 blinds with mesh material? 20 A. Correct. 21 Q. And those hub style blinds had nonmesh 22 material and had camouflage, right? 23 A. I'm not understanding. I mean -- I'm 24 not understanding.	Page 37 1 A. I guess maybe I'm confused. The 2 picture that we are looking at is the Den with 3 shoot-through mesh. That's a fine mesh that 4 covers the windows. 5 Q. Okay. And so in the picture in 6 paragraph 50, the shoot-through mesh are those 7 triangle features? 8 A. Yes, in the corner windows there. 9 Q. In the corners, okay. 10 A. Yes. 11 Q. This shoot-through mesh that you use in 12 the Den, was this something that you had used in 13 prior hub style blinds? 14 A. Yes. 15 Q. Dating back to 2015 and before, 16 correct? 17 A. Yes. 18 Q. Okay. Can I ask you about the 19 see-through mesh? Is it the case that the 20 see-through mesh has a camouflage pattern printed 21 on it? 22 A. Okay. I don't want to correct you, but 23 are you referring to the one-way see-through 24 fabric, or are you referring to the shoot-through

Page 38 1 mesh? 2 Q. Sorry. No. I do want you to correct 3 me if the question is -- thank you for that. 4 I am talking about the shoot-through 5 mesh that we are looking at in paragraph 50 and 6 which had been used in prior versions of hub style 7 brands at Ameristep. That shoot-through mesh, 8 does it have a camouflage pattern printed on it? 9 A. Yes. 10 Q. If there is a hunter inside of the 11 blind, can they see outside of the blind -- 12 A. Yes. 13 Q. -- through those windows? 14 A. Yes. 15 Q. Does the camouflage material conceal 16 the hunter inside of the blind? 17 A. Yes. 18 MR. WOLTER: Object to the line of 19 questioning as beyond the scope. 20 MR. ABDELNOUR: We can certainly 21 disagree about that, but I'm going to 22 continue. I'm asking him about the blind in 23 paragraph 50 of his declaration. How is that 24 outside the scope?	Page 40 1 camouflage on both sides of the material or just 2 on one side? 3 A. Just on one side, but the mesh is so 4 thin, it is so fine, that you couldn't really 5 tell. 6 Q. So you print it on the outside of the 7 mesh, the side that you would see if you are 8 looking outside in the blind looking in, right? 9 A. Yes. 10 Q. You are not printing anything on the 11 other side of the shoot-through mesh, right? 12 A. No, no. 13 Q. Before you print on to that mesh, what 14 color is the mesh? 15 A. Whatever the base color is. It's 16 normally like a light gray. 17 Q. Is it ever black? 18 A. No, no, because you lose your 19 visibility. 20 Q. Can you explain that? If you have the 21 shoot-through mesh and you print camouflage on it 22 and the mesh is black to start, why do you lose 23 your visibility? 24 A. Just because it obstructs your vision
Page 39 1 MR. WOLTER: Dennis, I just raised the 2 objection. I didn't say you have to stop 3 questioning. So it is outside the scope. He 4 didn't provide any opinion. This is just a 5 simple -- if you look at the declaration, it 6 is referring to the window configuration as 7 opposed to the mesh material. It's not 8 referring to the mesh material. It's just an 9 example of window configurations that were 10 used. There is no mention of the mesh 11 material relative to this particular blind. 12 MR. ABDELNOUR: I think I have made my 13 point about the objection, and I will 14 continue. 15 Q. For this shoot-through mesh, was there 16 anything on the inside of the mesh? 17 A. No. 18 Q. Now, what color was the mesh? 19 A. The mesh -- we would print the mesh in 20 camouflage. Preferably whatever camouflage we 21 were printing the blind, we would print the 22 shoot-through mesh in the same camouflage. 23 Q. Okay. So let's talk about the 24 shoot-through mesh material. Are you printing in	Page 41 1 looking out. 2 Q. What if you were to apply a black ink 3 on the inside of this shoot-through mesh and a 4 camouflage ink on the other side -- 5 MR. WOLTER: Object to form, calls for 6 speculation. 7 BY MR. ABDELNOUR: 8 Q. -- could you see through it? 9 A. Not as well. 10 Q. Why not? 11 A. We have experimented with it, and my 12 conclusion was always we need to start with a 13 light gray because if you start with black, you 14 lose too much visibility. 15 Q. Can you turn to paragraph 64 of your 16 declaration? 17 A. Yes. 18 Q. In paragraph 64 you state the 19 following: "To that end, the invention for a 20 pop-up blind that includes a one-way see-through 21 mesh that has a camouflage pattern on one side 22 (outside surface) and a black coating on the other 23 side (inside surface) has met the above identified 24 needs and solved the problems associated with

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1 ground blinds...." Did I read that correctly?

2 A. Yes.

3 Q. If you were experimenting with

4 shoot-through mesh which already had camouflage on

5 one side, outside surface, why didn't it work if

6 you simply applied a black coating on the other

7 side as you state in paragraph 64?

8 A. All I can tell you, Dennis, is we would

9 experiment with lots of different fabrics in lots

10 of different ways, and with the one-way

11 see-through fabric, we would make it all black on

12 the inside, and that would make it very visible

13 from the inside looking out.

14 When you take that fine mesh, the

15 shoot-through mesh, that very fine mesh, when you

16 print it -- if you were to print it with black,

17 you would never see the camo. It's so fine that

18 it wouldn't -- it wouldn't be worth printing it in

19 camo.

20 Q. So is the distinction between the

21 see-through mesh and the shoot-through mesh

22 dependent upon the starting mesh material that you

23 use?

24 A. Yes.

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1 Q. Is the one-way see-through feature

2 dependent upon the mesh that you are going to use?

3 A. Yes.

4 MR. WOLTER: Objection, beyond scope.

5 BY MR. ABDELNOUR:

6 Q. Is it dependent upon characteristics of

7 the mesh such as how fine the mesh is?

8 A. Yes.

9 Q. Is it also dependent upon

10 characteristics of the mesh including how big the

11 holes are in the mesh?

12 A. Yes.

13 Q. I should have mentioned this at the

14 outset, Mr. Ransom, but if you need a break at

15 all, I'm happy to take a break whenever. I need

16 one every hour or so.

17 A. I'm good.

18 Q. Okay. Let's keep going.

19 A. I'll let you know, but thank you.

20 Q. Let's go another 10 minutes or so, and

21 then I may have to ask you for a break, but I'll

22 go as long as you want.

23 In a couple places but at paragraph 65

24 of your declaration, you talk about licensing with

Page 44

1 Rugged Cross, right?

2 A. I'm not following. Paragraph 65,

3 licensing.

4 Q. Right. Your declaration discusses your

5 licensing arrangement with Rugged Cross, right?

6 A. Yes.

7 Q. You did not submit the actual license

8 that Primal has with Rugged Cross along with your

9 declaration, correct?

10 A. Correct.

11 Q. And I take it to understand the full

12 arrangement between Primal and Rugged Cross,

13 someone would need to review the full license

14 agreement, fair?

15 A. Yes.

16 Q. And you agree with me you didn't

17 undertake to set forth all of the terms of that

18 license agreement in your declaration, correct?

19 A. Correct.

20 Q. For example, your declaration does not

21 describe the licensing rate, if any, that you pay

22 to Rugged Cross, correct?

23 A. Correct.

24 Q. If there are any payments made from

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1 Primal to Rugged Cross, the amounts of those

2 payments are not included in your declaration,

3 correct?

4 A. Yes.

5 Q. The declaration doesn't identify how

6 many patents are covered by the license, correct?

7 A. Correct.

8 Q. I take it that the license covers more

9 patents than just the '535 patent, true?

10 A. I don't know.

11 Q. You don't know without looking at the

12 license, right?

13 A. Right, right.

14 Q. You're aware that Rugged Cross has more

15 than one patent, right?

16 A. Yes.

17 Q. Do you have an understanding whether

18 Primal is licensed to all of Rugged Cross's

19 patents?

20 A. What I understand is Chris has been

21 allowed more coverage since we created our

22 license, and we didn't rewrite the agreement.

23 Q. At the time of the initial agreement,

24 did it cover more than one patent?

Page 46 1 A. I do not recall. 2 Q. Have you ever read the '535 patent? 3 A. I have. 4 Q. When was the last time you read it? 5 A. Back upon -- you know, prior to us 6 taking the license. 7 Q. Okay. And that's where I'm confused 8 and I want to try to focus it here. So the 9 license was taken I think you said July 2022, 10 correct? 11 A. If it's in my -- whatever I said in my 12 declaration. 13 Q. Yes. In paragraph 67, the last 14 sentence, you state that Primal and Rugged Cross 15 entered into a license agreement in July 2022. 16 A. Okay. Yes. 17 Q. Now, the '535 patent issued in August 18 of 2022, after the license agreement. Were you 19 aware of that? 20 A. No. 21 Q. So I have to assume that the patent 22 that you reviewed before you entered into a 23 license agreement was not the '535 patent because 24 it hadn't issued yet. Fair enough?	Page 48 1 long as ground blinds have been in existence, and 2 certainly from the introduction of the hub-style 3 blind in 1996, there has been a long-felt need for 4 a ground hunting blind that did not include blinds 5 spots, or minimized the blind spots that required 6 an occupant to move to expand a field of view." 7 Is that your testimony? 8 A. Yes. 9 Q. And that's the opinion that you're 10 offering to the Patent Office in this case, 11 correct? 12 A. Yes. 13 Q. And so to put a fine point on it, the 14 long-felt need that you have identified was a need 15 for a hub style blind with no blind spots, right? 16 A. That's part -- yes. It helps eliminate 17 blind spots for sure. 18 Q. Your opinion is not that there was a 19 long-felt need for a material with one-way 20 viewing, correct? 21 A. That is what I am stating there. It's 22 one and the same. You can see out, but you can't 23 see in. 24 Q. Is it your opinion that there is a
Page 47 1 A. Yes. I mean, I don't recall. In my -- 2 I would -- as I've previously testified, I just 3 turned it over to my attorney. My attorney 4 instructed me to take a license. There was a 5 license drawn up, and we entered into an 6 agreement. 7 MR. ABDELNOUR: I'm going to turn to 8 something different now. Why don't we take a 9 10-minute break if that's okay with you. 10 THE WITNESS: Sure, sure, yes. You 11 bet. 12 MR. ABDELNOUR: Let's say 10:25 or 13 11:25 Eastern. 14 MR. WOLTER: Okay. 15 THE WITNESS: Okay. 16 MR. ABDELNOUR: Thanks, everybody. 17 THE WITNESS: Thank you. 18 (Recess taken.) 19 MR. ABDELNOUR: Let's get on the 20 record. 21 Q. Welcome back, Mr. Ransom. Paragraph 59 22 of your declaration, can you turn to that, please. 23 A. Yes. 24 Q. You state that, "In my opinion since as	Page 49 1 long-felt need for a material with one-way 2 viewing? 3 A. Yes. 4 Q. And my question there is going to be 5 generally, not just in the context of your 6 industry, but generally do you have a basis to 7 opine that there was a long-felt need for material 8 with one-way viewing? 9 A. Yes. 10 Q. What's that opinion based on? 11 A. My personal experience. 12 Q. Anything else? 13 A. No -- well, yeah, yes, yes, there is. 14 It's my personal experience. When I sit inside 15 the blind and I can see out, that's a wonderful 16 experience when you're outside the blind and you 17 can't see in. That's part of it. The other part 18 is from a marketability standpoint, everybody 19 wants it. So between my personal experience from 20 a hunter and my professional experience from being 21 in the business as long as I've been in, the 22 one-way see-through fabric fits both needs. 23 Q. So the need is a feature need, correct? 24 It's a feature of the blind or the --

Page 50 1 A. Yes. 2 Q. Sorry. You can answer. 3 A. Yes. 4 Q. The long-felt need that you described 5 is not a long-felt need from a technological 6 perspective, correct? 7 A. No. Technologically speaking, it 8 prevents game from seeing in the blind. 9 Q. And what I really want to pin down on 10 this question of one-way viewing, material that 11 allows somebody to see through one direction but 12 not through another direction, do you know whether 13 that was known before the Rugged Cross patent or 14 not? 15 A. I do not. To my knowledge it was not 16 known prior. 17 Q. Right. And to your knowledge based on 18 your work and your work in the industry, right? 19 A. Correct. 20 Q. Okay. Are you aware of -- let me put 21 it different. 22 Is there any description in your 23 declaration of someone attempting to create a 24 one-way viewing feature and being unsuccessful?	Page 52 1 and the blind would stick out, and I didn't 2 think -- from a consumer standpoint, they did not 3 like the fact that the sheen from the window 4 coverings gave away the location of the blind. 5 Q. Okay. I want to come back to the scent 6 containment product in a few minutes. 7 A. Okay. 8 Q. That's not in your declaration, 9 correct? 10 A. Yes. 11 Q. In preparing your opinion here, did you 12 do anything to research whether there have been 13 attempts to develop one-way viewing material in 14 any context? 15 A. In creating my declaration? 16 Q. Yes. 17 A. No. 18 Q. In offering an opinion that there was a 19 long-felt need, at what point in time did you 20 analyze the question of whether there was a 21 long-felt need? 22 A. When I saw the blind being marketed for 23 the first time. 24 Q. What date was that?
Page 51 1 A. No. Could you restate the question? I 2 might be confused on that. 3 MR. ABDELNOUR: Suzanne, let's try 4 this. Can you read it back. 5 (Question read.) 6 A. No. 7 BY MR. ABDELNOUR: 8 Q. Did Ameristep where you worked ever 9 make an attempt to design a one-way viewing 10 material? 11 A. Ameristep made a product called total 12 scent containment, and what that was is it was a 13 cellophane Saran wrap covering that went over the 14 window, and our basis for total scent containment 15 was to do just what the description says, contain 16 your scent, and there was -- as a result -- we 17 were unsuccessful with it, but we were trying to 18 contain scent in that situation. 19 Q. What do you mean you were unsuccessful? 20 A. Well, okay. So we made this product, 21 and unfortunately the window coverings reflected 22 too much sunlight, and as a result, if your blind 23 was at the other end of the field and the sun -- 24 the sun would reflect off the window coverings,	Page 53 1 A. What did I say? It was at the ATA 2 show. It would have been around '18 or '19. 3 Q. Okay. Did you do any research to 4 determine whether the one-way viewing feature was 5 available before you first saw it in 2018 or 2019? 6 A. I did not. 7 Q. Your opinion of long-felt need -- and 8 maybe I've asked this and I apologize, but I just 9 want to have it clear. Your opinion of long-felt 10 need is based on your personal observations and 11 experience in the industry, correct? 12 A. Correct. 13 Q. In support of your opinion, have you 14 cited any contemporaneous evidence identifying 15 this long-felt need? 16 A. Not other than what I have stated about 17 my personal and professional hunting experience. 18 Q. So, for example, you haven't cited to 19 any patents that say this is a long-felt need, 20 correct? 21 A. Correct. 22 Q. You haven't cited to any industry 23 reports identifying this long-felt need, correct? 24 A. Correct.

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1 Q. You haven't cited any patent
2 applications or white papers or advertisements
3 identifying this as a long-felt need, correct?
4 A. Well, from a professional standpoint, I
5 would say as far as reviewing marketing material,
6 you can establish that there is a long-felt need
7 based on the fact that everyone has it and
8 everyone markets it and everyone that's in the
9 blind industry has one.
10 Q. And I understand that. I understand
11 that opinion. My question is a little bit
12 different, and that is you haven't identified any
13 written material that says this is a long-felt
14 need in our industry?
15 A. No.
16 Q. Correct?
17 A. Correct.
18 Q. Did you analyze the '535 patent to
19 identify whether it said that there was a
20 long-felt need for hunting blinds that do not
21 include blind spots?
22 A. No.
23 Q. Have you assessed whether the claims of
24 the '535 patent cover blinds that may have blind

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1 spots?
2 A. No.
3 Q. Do you know one way or the other
4 whether the claims of the '535 patent require
5 blinds that have no blind spots?
6 A. No.
7 Q. What is the denier rating?
8 A. The weight of the fabric.
9 Q. And are you familiar with denier
10 ratings?
11 A. Yes.
12 Q. In the context of your work?
13 A. Yes.
14 Q. Does mesh fabric have a denier rating?
15 A. I don't know. Are you talking about
16 the shoot-through mesh or the see-through mesh?
17 Q. Any mesh. Generally, would mesh
18 material have a denier rating?
19 A. Yes.
20 Q. And would that denier rating be
21 different for shoot-through mesh and banner mesh,
22 for example?
23 MR. WOLTER: Objection.
24 A. Banner mesh?

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1 BY MR. ABDELNOUR:
2 Q. Let me ask it differently.
3 A. I don't --
4 Q. Let me ask it differently. The one-way
5 see-through mesh you use on your products today,
6 would that mesh have a different denier rating
7 than the shoot-through mesh that you talked about?
8 A. Yes.
9 Q. Would you agree that the denier rating
10 would have an impact on whether and how well
11 somebody could see out of a tent?
12 A. Yes.
13 MR. WOLTER: I'll object to that
14 question as beyond scope.
15 BY MR. ABDELNOUR:
16 Q. How many hunting blinds did Ameristep
17 offer on the market in the time frame that you
18 worked there?
19 A. Different models?
20 Q. Sure.
21 A. Over all the years? Over all the
22 years, different models. I would only have to
23 guess, but I mean is lots a good answer?
24 Q. Yes, lots is okay. I mean, is it more

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1 than 10?
2 A. It's probably more than 30.
3 Q. Okay. Are you familiar with the
4 Ameristep penthouse blind?
5 A. I am.
6 Q. Can you describe it for me?
7 A. It's a spring steel blind with a 66 by
8 66 inch footprint. It's got double-zippered
9 portholes inside of double-zippered horizontal
10 windows on the sides of the blind. It's about 72
11 inches 8 tall. You can stand up in it easily.
12 You can stand up and shoot a bow in it.
13 Q. When was the penthouse blind offered
14 for sale?
15 A. '99, 1999.
16 Q. How long was it on the market?
17 A. I'm not sure if it's still on the
18 market now, but we were selling it in 2012 when I
19 sold the company. It had one way -- or not one
20 way. It had shoot-through mesh.
21 MR. ABDELNOUR: I'm going to mark what
22 we will call Ransom Deposition Exhibit 1.
23 (Ransom Deposition Exhibit 1 was
24 marked for identification.)

Page 58 1 BY MR. ABDELNOUR: 2 Q. Let me share my screen here. 3 Mr. Ransom, can you see the document I have put on 4 the screen? 5 A. Yes. 6 Q. It says "Ameristep Quality Hunting, 7 Penthouse TSC Blind, Instruction Manual." Do you 8 see that? 9 A. Yes. 10 Q. It's a five-page document. Let me 11 scroll through it for your benefit for a second 12 here. This is the first page, second page, third 13 page, fourth page, and this is the last page. Can 14 I ask, are you familiar with this instruction 15 manual? 16 A. Yes. 17 Q. Can you identify it for us? 18 A. Yes. 19 Q. Describe it. Please tell us what it 20 is. 21 A. It's an instruction manual for our 22 penthouse TSC blind. 23 Q. If I wanted to know the date that this 24 instruction manual would have been available to	Page 60 1 with this product, correct? 2 A. Correct. 3 Q. Let's do this. There is a description 4 on the second page of this instruction manual 5 where it labels the features of the penthouse 6 blind. Do you see that? 7 A. Yes. 8 Q. And are you familiar with this 9 description? Have you seen this before? 10 A. Yes. 11 Q. Okay. So there's various windows, E 12 and B, correct? 13 A. Yes. 14 Q. And are these windows the shoot-through 15 mesh that you described earlier? 16 A. No. 17 Q. Can you be more specific? Can you 18 explain? 19 A. Yes. These -- okay. B -- this is 20 total scent containment and what -- we had two 21 window systems for this. One was your 22 shoot-through mesh, and then one was the 23 cellophane membrane which I referred to earlier as 24 total scent containment.
Page 59 1 the public, how would I figure that out? 2 A. Are you talking about this particular 3 version, this particular model specifically? 4 Q. Yes, this version, this model. 5 A. How would I figure it out? 6 Q. Would there be some identifier in this 7 document that -- 8 A. I don't -- I don't know. I don't know 9 if there would be -- there should be. It should 10 be dated. It should be dated for sure. 11 Q. This is page 5, the bottom of the last 12 page. 13 A. Yes. 14 Q. In the bottom right-hand corner, it 15 says "REV. 4/05." 16 A. Yes. 17 Q. Is that a date? 18 A. Yes, I'm sure it is. Yes, it is. 19 Q. What is that date? 20 A. 2005. 21 Q. April 2005? 22 A. Correct. 23 Q. Okay. So that's the date that this 24 instruction manual would have been available along	Page 61 1 Q. And so these windows would have been 2 the total scent containment windows? 3 A. It had both. 4 Q. Okay. So total scent containment is to 5 contain the human scent inside the tent, right? 6 A. Yes. 7 Q. And so the cellophane is going to go 8 over the mesh window portion, correct? 9 A. Yes. I don't recall exactly which one 10 covered, but, yes. 11 Q. Okay. 12 A. Yes. 13 Q. And the mesh windows here had 14 camouflage printed on them, correct? 15 A. Correct. 16 Q. Okay. So I want to go down a little 17 bit to -- this is the last page where it's got 18 "Windows Installation Instructions." Do you see 19 that? 20 A. Yes. 21 Q. And in the middle of this page, there 22 is a section that says "How the Ameristep Total 23 Scent Containment (TSC) System Works." Do you see 24 that?

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Page 62 1 A. Yes, yes. 2 Q. And it describes the TSC system as a 3 "black ShadowGuard interior lining" for the window 4 membranes, right? 5 A. Yes. 6 Q. And so it further says, "The 7 ShadowGuard interior lining not only eliminates 8 shadows and silhouettes, it also contains human 9 scent within the blind," correct? 10 A. Correct. 11 Q. And it describes these windows as 12 "see-through, shoot-through TSC windows," correct? 13 A. Correct. 14 Q. And it promotes these in part as 15 "enabling hunters to remain completely concealed 16 within the blind while still being able to see and 17 shoot." Do you see that? 18 A. Yes. 19 Q. And would you agree with me that the 20 concept of the black interior lining is to promote 21 this concept of concealing the hunter within the 22 blind, right? 23 A. Yes. 24 MR. ABDELNOUR: Mr. Ransom, let me put	Page 64 1 understand. 2 Q. No. That's okay. Are you familiar 3 with the contents of this patent sitting here 4 today? 5 A. Yes. 6 Q. Does the patent contain a description 7 of your total scent containment system? 8 A. Yes. 9 Q. Okay. For the total scent containment 10 system, this cellophane material that you 11 described, are you applying that only to the 12 windows or to the entire inside of the tent? 13 MR. WOLTER: Object to form of the 14 question, lack of foundation. 15 MR. ABDELNOUR: You can answer. 16 A. Only the windows. 17 MR. WOLTER: Are you referring to the 18 total scent containment in the manual or in 19 the patent? 20 MR. ABDELNOUR: He understood the 21 question. 22 Can we take a five-minute break? 23 I am nearly done. I know it's lunchtime for 24 you guys. Can we take a five-minute break?
Page 63 1 up another exhibit, and I am going to mark 2 this as Ransom Deposition Exhibit No. 2. 3 (Ransom Deposition Exhibit 2 was 4 marked for identification.) 5 BY MR. ABDELNOUR: 6 Q. Let me share. This is U.S. Patent 7 No. 7,493,910. Do you see that? 8 A. Yes. 9 Q. Are you familiar with this patent? 10 A. Yes. 11 Q. Can you identify it? 12 A. It's a scent containment system for 13 hunting blinds. 14 Q. And if I look on the front page -- 15 maybe I can make it bigger for you -- there is an 16 inventor listed, Robert M. Ransom. Is that you? 17 A. Yes, it is. 18 Q. Okay. So this is your patent for your 19 total scent containment system? 20 A. Yes. 21 Q. And does this patent contain a 22 description of how the total scent containment 23 system works? 24 A. I'm sorry. Could you -- I don't	Page 65 1 We'll come back, I can finish up, and I 2 promise to be quick when we come back. 3 THE WITNESS: Sure. 4 MR. ABDELNOUR: All right. Let's do 5 that. 6 THE WITNESS: I'm fine. Yes. 7 MR. ABDELNOUR: Okay. Thank you. 8 (Recess taken.) 9 BY MR. ABDELNOUR: 10 Q. Mr. Ransom, does Primal sell products 11 that are covered by the Rugged Cross license that 12 you described in your declaration? 13 A. Yes. 14 Q. Does Primal sell those products direct 15 to consumers or through retailers? 16 A. Both. 17 Q. Which retailers does Primal sell 18 through? 19 MR. WOLTER: Objection, beyond scope. 20 A. Dom's [phonetic], Northwoods. That's 21 pretty much it right now. There's some more 22 retailers, but nothing is really popping into my 23 mind. 24 BY MR. ABDELNOUR:

Page 66 1 Q. Does Primal sell to Walmart? 2 A. Not this year. 3 Q. Did Primal sell to Walmart in the past? 4 A. Yes. 5 MR. WOLTER: Objection, same objection, 6 beyond the scope. 7 BY MR. ABDELNOUR: 8 Q. How did Primal first start selling 9 hunting blinds covered by the Rugged Cross license 10 to Walmart? 11 MR. WOLTER: I am going to raise the 12 same objection. This is beyond the scope, 13 and this is nothing more than asking for 14 confidential business information. 15 MR. ABDELNOUR: I am just asking at a 16 high level. You can answer. 17 A. I sold them to Walmart. 18 Q. Was the fact that Primal had a license 19 to Rugged Cross a factor in that sale? 20 A. No. 21 Q. Was it discussed? 22 A. With who, Walmart? 23 Q. Yes. 24 A. No, no. I had sold them prior to	Page 68 1 A. No. 2 Q. Have you had any discussions with 3 Rugged Cross about FeraDyne? 4 A. Other than they're an infringer, other 5 than that information. 6 Q. Nothing else? 7 A. No. 8 MR. ABDELNOUR: Okay. I have no 9 further questions. Thank you, Mr. Ransom. 10 THE WITNESS: Thank you. 11 MR. WOLTER: I have a few questions, 12 Mr. Ransom. Can I have access to that -- I 13 think it was Exhibit 2, the TS -- 14 MR. ABDELNOUR: The patent? 15 MR. WOLTER: No, no, the manual. 16 MR. ABDELNOUR: Okay. So the manual 17 was Dep Exhibit No. 1. The patent was Dep 18 Exhibit No. 2, but, yes, I can pull it up. 19 CROSS-EXAMINATION 20 BY MR. WOLTER: 21 Q. Before we get to that, however, 22 Mr. Ransom, I believe you testified earlier that 23 you currently have a license with Rugged Cross; is 24 that correct?
Page 67 1 having a license. 2 Q. Did the license with Rugged Cross -- 3 was it ever raised with Walmart in the context of 4 your relationship on these products? 5 A. No, no. 6 Q. Does Primal sell hunting blinds that 7 are not covered by the Rugged Cross license? 8 A. Yes. 9 Q. How many models does it sell that are 10 not covered by the Rugged Cross license? 11 A. Four. 12 Q. How many models are covered by the 13 license? 14 A. Five. 15 Q. In your declaration you don't provide 16 any information about the relative number of sales 17 between covered products and noncovered products, 18 correct? 19 A. Correct. 20 Q. Have you had any discussions with 21 Rugged Cross about DBR or OPI? 22 A. No, other than they're involved in this 23 dispute. 24 Q. Anything more specific?	Page 69 1 A. Yes. 2 Q. And have you paid royalties to Rugged 3 Cross as a result of that license? 4 A. Yes. 5 Q. And do you pay those royalties on a 6 quarterly basis? 7 A. Yes. 8 MR. ABDELNOUR: Objection, outside the 9 scope. 10 BY MR. WOLTER: 11 Q. And do you continue to pay royalties to 12 Rugged Cross? 13 A. Yes. 14 MR. WOLTER: I'm sorry. Could you 15 bring that exhibit up? 16 MR. ABDELNOUR: Sure. 17 MR. WOLTER: Am I able to move this 18 thing or no? 19 MR. ABDELNOUR: It's on my screen. Let 20 me know what you want me to do, or I can 21 email it. 22 MR. WOLTER: Can you go to the last 23 page? 24 MR. ABDELNOUR: Sure. Actually, this

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Page 70 1 is the last page. 2 MR. WOLTER: Okay. Go to the page that 3 has all the arrows and the letters. I think 4 that was it. And then blow it up. Scroll. 5 There we are. 6 Q. Mr. Ransom, can you see this Exhibit 1? 7 A. Yes. 8 Q. What is that that is labeled in the 9 arrows with the letter E? 10 A. Oh, those are double-zippered 11 portholes. 12 Q. Okay. What is a porthole? I'm sorry. 13 This E says porthole windows. What does porthole 14 windows mean? 15 A. It's just a smaller -- it's a reference 16 for a smaller hole, smaller viewing area, smaller 17 shooting area. 18 Q. Okay. So it's not a reference to a 19 type of mesh material? 20 A. No. 21 Q. So in this particular blind, which 22 windows had -- I believe it refers to a 23 shoot-through mesh. Which windows had a 24 shoot-through mesh?	Page 72 1 great day. 2 THE REPORTER: Will the witness read 3 and sign? 4 MR. WOLTER: Yes, he would read and 5 sign. 6 THE REPORTER: Are you ordering, 7 Mr. Abdelnour? 8 MR. ABDELNOUR: Yes, please. 9 THE REPORTER: And do you need a copy, 10 Mr. Wolter? 11 MR. WOLTER: Yes. 12 (Witness excused.) 13 14 15 16 17 18 19 20 21 22 23 24
Page 71 1 A. I know that the porthole windows had 2 shoot-through mesh, and my recollection is the 3 large horizontal window was the total scent 4 containment, which is the cellophane membrane that 5 encompasses the entire window. 6 Q. This penthouse TSC blind, did that have 7 blind spots? 8 A. It did. It did. 9 Q. Did this have a one-way see-through 10 mesh as you understand that term is used in 11 connection with the '535 patent? 12 MR. ABDELNOUR: Objection, form. 13 A. It did not have one -- we stated that 14 it did, but unfortunately it didn't work. It 15 wasn't successful; hence, it's not on the market. 16 The clarity that we came up with was unacceptable. 17 BY MR. WOLTER: 18 Q. What do you mean by "clarity"? 19 A. It was difficult to see out. 20 MR. WOLTER: Okay. That's all the 21 questions I have. 22 MR. ABDELNOUR: Nothing further from 23 me. Thank you, Mr. Ransom. 24 THE WITNESS: Thank you. Guys, have a	Page 73 1 UNITED STATES PATENT AND TRADEMARK OFFICE 2 BEFORE THE PATENT TRIAL AND APPEAL BOARD 3 4 DBR FINANCE, INC.,) 5) 6) 7) 8) 9) 10) 11) 12) 13) 14) 15) 16) 17) 18) 19) 20) 21) 22) 23) 24) 1 Petitioner,) Inter Partes Review 2) No.: IPR2024-00291 3 vs.) 4) 5) 6) 7) 8) 9) 10) 11) 12) 13) 14) 15) 16) 17) 18) 19) 20) 21) 22) 23) 24) 1 Patent Owner.) 2) 3) 4) 5) 6) 7) 8) 9) 10) 11) 12) 13) 14) 15) 16) 17) 18) 19) 20) 21) 22) 23) 24) 1 Patent 11,399,535) 2) 3) 4) 5) 6) 7) 8) 9) 10) 11) 12) 13) 14) 15) 16) 17) 18) 19) 20) 21) 22) 23) 24) 1 Filing Date: June 11, 2021) 2) 3) 4) 5) 6) 7) 8) 9) 10) 11) 12) 13) 14) 15) 16) 17) 18) 19) 20) 21) 22) 23) 24) 1 Issue Date: August 2, 2022) 2) 3) 4) 5) 6) 7) 8) 9) 10) 11) 12) 13) 14) 15) 16) 17) 18) 19) 20) 21) 22) 23) 24) 1 Title: CAMOUFLAGE) 2) 3) 4) 5) 6) 7) 8) 9) 10) 11) 12) 13) 14) 15) 16) 17) 18) 19) 20) 21) 22) 23) 24) 1 BLIND) 2) 3) 4) 5) 6) 7) 8) 9) 10) 11) 12) 13) 14) 15) 16) 17) 18) 19) 20) 21) 22) 23) 24) 1 I, ROBERT RANSOM, being first duly 2 sworn, on oath say that I am the deponent in the 3 aforesaid deposition taken on October 30, 2024; 4 that I have read the foregoing transcript of my 5 deposition, consisting of pages 1 through 74 6 inclusive, and affix my signature to same. 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 1 Corrections have been submitted 2 No corrections have been 3 submitted 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 1 ROBERT RANSOM, Deponent 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 1 Subscribed and sworn to 2 before me this day of 3 , 20__ 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 1 Notary Public

) SS.

3 I, Suzanne Thalji, a Certified
4 Shorthand Reporter, do hereby certify:

5 That prior to being examined, the
6 witness in the foregoing proceedings was by me
7 duly sworn to testify to the truth, the whole
8 truth, and nothing but the truth;

9 That said proceedings were taken
10 remotely before me at the time and place therein
11 set forth and were taken down by me in shorthand
12 and thereafter transcribed into typewriting under
13 my direction and supervision;

14 I further certify that I am neither
15 counsel for, nor related to, any party to said
16 proceedings, not in anywise interested in the
17 outcome thereof.

18 In witness whereof, I have hereunto
19 subscribed my name.

20 Dated: November 7, 2024.

Auzonne Itali

23 Notary Public

24 CSR No. 084-002337 - Expiration Date: 5/31/25

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