

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

Inter Partes Review No.: IPR2024-00291

* * * * *

DBR FINANCE, INC., *

Petitioner *

V. *

RUGGED CROSS HUNTING BLINDS, LLC., *

Patent Owner *

* * * * *

DEPOSITION OF:

DR. KIMBERLY CAMERON

Conducted Remotely

November 6, 2024 at 1:37 p.m.

Volume II

Christine M. Lo Schiavo

Professional Court Reporter

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2
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16
17 Also Present:

18 Thomas Eschweiler

19 Jefferson Derry

I N D E X

WITNESS:

Dr. Kimberly Cameron

EXAMINATION BY:

PAGE:

Mr. Abdelnour

5

EXHIBITS:

PAGE:

(None offered)

1 THE COURT REPORTER: Okay. I am just
2 going to ask that we put on the record --
3 I'm -- I'm on the record now, and I'm just
4 going to ask if you could all just stipulate
5 once again to doing this remotely. I won't
6 read the whole thing, but if you could just
7 each take a moment and just agree that we're
8 okay to do this remotely again, I would
9 appreciate it. And then I will swear in Dr.
10 Cameron again.

11 MR. ABDELNOUR: Yes, I agree.

12 MR. ESCHWEILER: I agree.

13 THE COURT REPORTER: Dr. Wol --
14 doctor -- Attorney Wolter, you're on mute.

15 MR. WOLTER: We both agree.

16

17 KIMBERLY CAMERON, Deponent, having first
18 been satisfactorily identified and duly sworn,
19 deposes and states as follows:

20

21 THE COURT REPORTER: Okay. You can
22 begin. I'm going to put myself on mute
23 again.

24

1 EXAMINATION BY MR. ABDELNOUR:

2

3 Q. Welcome back, Dr. Cameron.

4 A. Thank you.

5 Q. Since we ended the day yesterday, and
6 today, did you speak with your -- Rugged Cross's
7 lawyers?

8 A. No, but I -- I did text him to -- I
9 couldn't find the link, so I asked him to email it
10 to me.

11 Q. When -- when were you first engaged
12 by Rugged Cross in this matter?

13 A. I don't remember that date.

14 Q. About when?

15 A. I don't know. Maybe -- I'm not --
16 I'm not sure. Maybe early this year. I -- I don't
17 remember.

18 Q. Your declaration is dated September
19 5, 2024.

20 A. Mm-hmm.

21 Q. Relative to the signing of your
22 declaration, when were you retained? Was it days
23 before? Weeks before?

24 A. No. It was -- it was much longer

1 than that.

2 Q. Months?

3 A. I don't remember exactly. It
4 might've been, or it might've been longer.

5 Q. How -- how much time have you put in
6 this matter to date?

7 MR. WOLTER: Objection, as to beyond
8 the scope.

9 THE WITNESS: I don't remember
10 exactly.

11 Q. (By Mr. Abdelnour) Approximately,
12 how much time?

13 A. I don't know. Something -- something
14 over a week's worth of time, something less than
15 two months' worth of time.

16 Q. So somewhere more than 40 hours, but
17 less than 300 hours, is that your testimony?

18 A. That's kind of a guess, yeah.

19 Q. More than 100 hours?

20 A. I -- I don't -- I don't know. That
21 was kind of my guess, the range.

22 Q. In preparing your expert declaration,
23 did you undertake to list specific citations to
24 evidence that you thought was supportive of your

1 analysis and opinions?

2 A. I think I probably have some
3 citations in my report, and I also tried to make a
4 list of kind of the materials I relied on.

5 Q. Right. But I'm asking you about the
6 citations. In preparing your declaration, did you
7 undertake to provide specific citations within
8 specific paragraphs that -- that, in your opinion,
9 would support your testimony in those paragraphs?

10 MR. WOLTER: Object to form. The
11 declaration speaks for itself in that
12 regard.

13 THE WITNESS: Yeah, I think I do have
14 citations within my declaration.

15 Q. (By Mr. Abdelnour) I -- Dr. Cameron,
16 I know you have citations in your declaration. My
17 question is, when you put your declaration
18 together, if there was evidence that you thought
19 was important, it's your practice to provide a
20 specific citation, and you did that in this case,
21 correct?

22 A. I don't know how you're
23 distinguishing that from what I said, which is I
24 did put, like, some citations, the things I wanted

1 to discuss, in the declaration.

2 Q. Recall we were talking about
3 strength? Yes?

4 A. Generally, yes.

5 Q. And in discussing strength in your
6 declaration, it's your opinion that there are no
7 holes in the fabric, correct?

8 A. Correct.

9 Q. And you state that in paragraph 75 of
10 your declaration, right?

11 A. Do you want me to pull that back up?

12 Q. You have it -- you have it, don't
13 you?

14 A. I have it. I just didn't have it
15 open. I didn't -- I don't have it open yet.

16 Q. If you need to pull it up to answer
17 the question, yes, I would like you to do that.

18 A. Yeah. I don't know, like, what's in
19 75 without looking.

20 Q. In paragraph 75, you're talking about
21 strength --

22 A. Sorry. I'm still looking; I'm still
23 looking for it. Sorry. I forget where I saved it.

24 Q. Didn't you get a printout,

1 Dr. Cameron? You were going to print out your --

2 A. No. I thought you said it was going
3 to be okay to -- I was getting someone to print it,
4 and then you said we -- we could go ahead with the
5 electronic, remember?

6 Q. Yeah -- no -- I -- okay. I'm
7 confused because I thought you said somebody was
8 bringing you a printout.

9 A. That's what I -- that is what I was
10 going to do, but then you said we could just use
11 the -- I told you I also had already the thing, so
12 I canceled that. If you want me to get a printout,
13 I still can.

14 Anyway, I --

15 Q. Yeah. Let -- let's go off the
16 record. Let's get a printout because I don't
17 want -- I don't want to spend my time on the record
18 while you're -- while you're poking around on -- on
19 the computer. Can we please do that?

20 A. Okay. I have the -- I can do that.
21 I do have the --

22 THE COURT REPORTER: Am I off -- am I
23 off the record?

24 MR. ABDELNOUR: Yes.

1 THE COURT REPORTER: Okay.

2 MR. ABDELNOUR: Off the record.

3

4 (A recess was taken)

5

6 THE COURT REPORTER: Go ahead.

7 Q. (By Mr. Abdelnour) Okay. Are you
8 looking at paragraph 75, Dr. Cameron?

9 A. Yeah, I opened that up before.

10 Q. Okay. It's your testimony that the
11 fabric of strength will not allow water or air to
12 pass through, as there are no holes in the fabric,
13 correct?

14 A. That's correct.

15 Q. Okay. And yesterday you testified
16 that that was based on your reading of strength,
17 right?

18 A. That's correct.

19 Q. Okay. Outside of your reading of
20 strength, is this opinion based on any analysis?

21 A. It's just based on what's in
22 strength.

23 Q. Okay. And you have strength there,
24 right?

1 A. Yeah, I should.

2 Q. Why don't you pull strength up,
3 please?

4 A. Yup, I have it.

5 Q. * Okay. I'm going to ask a question
6 about strength, but -- but first, would you agree
7 with me that knowledge of the particular molecular
8 weight of the polymer would be relevant to
9 determining the coverage of the coating on the base
10 material?

11 A. Did you say the mole -- can you
12 repeat that question?

13 MR. ABDELNOUR: Can you please read
14 it back?

15
16 * (Question Read)

17
18 THE WITNESS: Yeah, if you just mean
19 the density, that is a factor, yes.

20 Q. (By Mr. Abdelnour) Okay. And -- and
21 strength says the coating is an ethylene methyl
22 acrylate, right?

23 A. Correct.

24 Q. And that's polymer, correct?

1 A. Correct.

2 Q. And does strength provide the
3 molecular weight of that polymer?

4 A. I don't know if it does it or not,
5 but it does tell you the material and the density.

6 Q. But my question is just about the
7 molecular weight of the polymer. Do you agree that
8 strength does not disclose the molecular weight of
9 the polymer?

10 A. I don't know. I -- my guess is I --
11 doesn't have the -- a number for the molecular
12 weight.

13 Q. In paragraph 78, you state, "The base
14 material of strength does not comport with the
15 plain and ord" --

16 A. Hold on. Let me get back to
17 my -- let me switch back over. Okay.

18 Q. You're there?

19 A. Yeah. I mean, I'm in my declaration,
20 if you -- if you have questions --

21 Q. In paragraph 78 --

22 A. -- besides 50 -- 75, then you need to
23 tell me.

24 Q. You there?

1 A. I'm at 75. If you said to go
2 somewhere else, then you need to tell me.

3 Q. 78, please.

4 A. Okay.

5 Q. Paragraph 78, you state that, "The
6 base material of strength does not comport with the
7 plain and ordinary meaning of mesh in the context
8 of the 535 patent." Do you see that?

9 A. Yes.

10 Q. That's your testimony, correct?

11 A. That's correct.

12 Q. What is the "plain and ordinary
13 meaning of mesh in the context of the 535 patent"?

14 A. So I think I was explaining here
15 that, for example, it's not enough to just think
16 about -- like Dr. Ellison does, just calculate the
17 openness, because you have to read that in the
18 context of the 535 patent, which, you know, talks
19 about things like the air flow and the ventilation.

20 And so, as I mentioned, it's not
21 really good enough to just look at that ratio,
22 because if you have more holes per inch, you have
23 more retardation. And so you don't have, like,
24 kind of the same level of airflow, for example,

1 even if you have the same cover factor.

2 Q. So in order to assess whether a
3 material comports with the plain and ordinary
4 meaning of the mesh in the context of the 535
5 patent, you need to at least assess airflow,
6 correct?

7 A. That's -- I would say, the context
8 that -- part of the context that you're thinking
9 about for mesh, yes.

10 Q. In the context of the 535 patent,
11 right?

12 A. Correct.

13 Q. ** And -- and -- and so what -- what
14 level of airflow would qualify a material as mesh
15 in the context of the 535 patent?

16 A. I didn't think about that in terms
17 of, like, a particular number.

18 Q. * But strength doesn't qualify,
19 right?

20 A. Correct.

21 MR. WOLTER: I'm sorry. Can you
22 repeat that last question?

23 MR. ABDELNOUR: Christine, if you
24 want to read it back for --

1 THE COURT REPORTER: You...

2

3 * (Question read)

4

5 THE COURT REPORTER: Did you want the
6 question before that? He asked, "But
7 strength doesn't qualify, correct"?

8 MR. WOLTER: What was the question
9 before that?

10 THE COURT REPORTER: Okay. That's
11 what I wasn't sure if that's what you
12 wanted. Hang on.

13 MR. WOLTER: Okay. You know, I think
14 I'm good, Christine.

15 THE COURT REPORTER: Okay. It's --

16 MR. WOLTER: Okay.

17 THE COURT REPORTER: It's coming
18 right now. Are you sure?

19 MR. WOLTER: Okay. Go ahead.

20 THE COURT REPORTER: All right.

21 MR. ABDELNOUR: Christine, I think
22 he's --

23 THE COURT REPORTER: What?

24 MR. ABDELNOUR: This is -- this is

1 fairly --

2 THE COURT REPORTER: I can't hear if
3 you guys are talking, so hang on one second.

4

5 ** (Question read)

6

7 MR. WOLTER: Okay. All right. Thank
8 you, Christine.

9 THE COURT REPORTER: Yup.

10 Q. (By Mr. Abdelnour) And at the bottom
11 of paragraph 78, you -- you have a criticism of
12 Dr. Ellison. Do you see that?

13 A. Yes.

14 Q. You state that he over broadens the
15 term "mesh"?

16 A. Yes.

17 Q. How does Dr. Ellison understand the
18 term mesh?

19 A. He says it's -- he simply says it's a
20 fabric characterized by open spaces.

21 Q. And your testimony is that that's too
22 broad in the context of the 535 patents?

23 A. Well, if he hasn't -- if he has in
24 mind that there's no -- it doesn't matter at all

1 what the size of the holes is of those open spaces,
2 then yes, I -- I think that's overly broad.

3 Q. And can you tell us what size of the
4 open spaces of a -- of a material would qualify as
5 mesh, in your opinion?

6 A. So again, that's what I was talking
7 about before, where you look at the context of the
8 535 patent, and you're talking about ventilation
9 and things like that. So when you have, you know,
10 a very high hole density that doesn't really allow
11 ventilation, then that would really not be
12 considered a mesh under the 535 patent, even if it
13 has tiny open spaces.

14 Q. You said "tiny." My question is,
15 what is the -- numerically, what is the thresholds
16 of size or density of open spaces required by the
17 535 patent?

18 A. I did not think about what a precise
19 cutoff number would be.

20 Q. But strength doesn't qualify, right?

21 A. Correct.

22 Q. Is it your opinion that the inventors
23 of the 535 patent acted as their own lexicographers
24 in defining the term mesh?

1 A. No.

2 Q. Is it your opinion that there is a
3 clear and unmistakable disavowal of claims scope
4 regarding the types of mesh covered by the 535
5 patent?

6 A. What -- I didn't understand that
7 question.

8 Q. I'm just going to -- let me ask it
9 again. Is it your opinion that the 535 patent
10 vendors -- let me start over.

11 Is there a clear and unmistakable
12 disavowal of claims scope for the term "mesh" in
13 the 535 patent?

14 MR. WOLTER: Ob -- objection, as to
15 lack of foundation.

16 THE WITNESS: What -- what do you
17 mean by that?

18 Q. (By Mr. Abdelnour) Do you know what
19 "clear and unmistakable disavowal" means in the
20 context of claim construction?

21 A. I think I have heard that term
22 before, but I'm not entirely sure how you're using
23 it, or what you mean by that question.

24 Q. Then I take it you didn't find a

1 clear and unmistakable disavowal in the 535 patent;
2 is that fair?

3 A. That's your same question, and again,
4 I'm not sure. I don't understand your question.

5 Q. Is there anything in the 535 patent
6 or its file history that disavows the full scope of
7 the claim coverage with respect to the term mesh?

8 A. It's -- can you use normal words?
9 Because I still don't really understand what you
10 mean by that exactly.

11 Q. Sorry, Dr. Cameron. I'm using the
12 words of the legal standard, and I have to use
13 these words.

14 A. Well, then I just -- I don't
15 understand your question, then, is my answer.

16 Q. Okay. That's fine.
17 Let me -- let me ask it differently.
18 Did you find that the patentee of the 535 patent
19 intentionally disclaimed any claim scope?

20 A. So if -- if you mean something
21 different than what I kind of answered before,
22 about I don't think that the patentee was acting as
23 his own lexicographer for mesh, I guess when --
24 when you use that phrase, I kind of link it back to

1 that. So I do not believe that the patentee was
2 acting as its own lexicographer to change the
3 meaning of the term or to intentionally disclaim
4 scope. If that's all you mean by that, then that's
5 my answer.

6 Q. Okay. Can you please state your
7 opinion as it relates to objective indicia of
8 non-obviousness?

9 MR. WOLTER: Object to form.

10 THE WITNESS: So that's in a section
11 of my report that talks about secondary
12 considerations.

13 Q. (By Mr. Abdelnour) Can you answer my
14 question? Can you please state your opinion of
15 secondary considerations of non-obviousness?

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

18 THE WITNESS: So if you look -- I
19 mean, do you want me just to read my report
20 back to you? I'm trying to --

21 Q. (By Mr. Abdelnour) Let me ask it --
22 let me ask it this way.

23 A. Okay.

24 Q. Do you have an opinion as it relates

1 to secondary considerations of non-obviousness in
2 the context of the 535 patent? Yes or no.

3 A. Yes.

4 Q. Okay. Can you state it for me,
5 please?

6 A. I can read it for you if you want.
7 I'm not trying to waste your time, but it is
8 already in my report starting at paragraph 105. If
9 you want me to read it, I can.

10 Q. I don't want you to read your report.
11 I have your report.

12 A. My rep --

13 Q. I just want you to -- I just want you
14 to tell me what your opinion is.

15 A. Well, my opinion is contained in
16 those paragraphs, so I can read it to you or you
17 can read it if you already have or -- like, I
18 don't -- however you want to do this, but I'm
19 not -- I'm not trying to be difficult here.

20 Q. Okay. Which paragraphs are you going
21 to read to me?

22 A. Paragraphs 105.

23 Q. Yes. Any others?

24 A. Through -- I think through the end of

1 my report, but I'm just checking. Yeah, through
2 125.

3 Q. Okay. So you've cited for me 20
4 pages of your report. Can you summarize your
5 opinion of secondary considerations?

6 MR. WOLTER: Object to form.

7 THE WITNESS: So a lot -- I mean,
8 it's not really as long as you -- as that
9 because, like, some of it is the photos and
10 things like that, so the text is a lot
11 shorter.

12 Q. (By Mr. Abdelnour) Are you going to
13 answer my question?

14 A. My opinions on that are contained in
15 the paragraphs that I just said. If you want me to
16 read those to you, I can do that. It's not that
17 long because there's a lot of pictures in there.

18 Q. Dr. Cameron, we are not going to sit
19 here and have you read 20 pages of your report. If
20 you can't summarize your opinion, that's fine. I'm
21 going to move on.

22 A. I mean, that -- that's fine.

23 MR. WOLTER: Objection. Do you have
24 the report -- you've read the report, right,

1 Dennis?

2 Q. (By Mr. Abdelnour) Dr. Cameron, in
3 paragraph 106, you state that your secondary
4 consideration opinion is based on your review and
5 consideration of the evidence set forth in the
6 declarations of Chris Seaton, Jason Harris, Robert
7 Ranson, and Jay Scholes, correct?

8 A. Yes.

9 Q. And I take it that that is the entire
10 sum of evidence that you relied upon in forming
11 your opinions of secondary considerations, correct?

12 A. Including what was in those
13 declarations, yes.

14 Q. Okay.

15 A. And obviously, the analysis I did
16 with respect to the patent and the product.

17 Q. Okay. Just wait for -- just wait for
18 the next question.

19 A. That was part of my last answer.

20 Q. Is it your opinion that evidence of
21 licensing supports a finding of non-obviousness?

22 A. Yes.

23 Q. Why?

24 A. That's my understanding of the law,

1 is that can -- secondary considerations can be
2 shown by things such as licensing.

3 Q. Yes, that's the standard, but is your
4 analysis of the evidence in this case that
5 licensing supports -- the evidence of licensing
6 supports a finding of non-obviousness?

7 A. Yes.

8 Q. What facts?

9 A. We -- aren't we just talk -- are you
10 talking about beyond the licensing or just -- I
11 don't understand your question if it -- unless the
12 answer is just the licensing.

13 Q. And what facts about the licensing?
14 Can you be more specific?

15 A. I'm not sure what you mean.

16 Q. Do you have a -- an opinion of
17 whether the Rugged Cross licensing was successful?

18 MR. WOLTER: Object to form.

19 THE WITNESS: Yes. So as you can see
20 in some of the information that's in the
21 declaration, that licensing, like, led to
22 their commercial success in the market.

23 Q. (By Mr. Abdelnour) Have you reviewed
24 any of the Rugged Cross licenses?

1 A. I don't think I have reviewed the
2 actual license language, or at least I don't
3 remember doing so.

4 Q. Did you ask for the licenses?

5 A. I don't remember.

6 Q. Which terms about these licenses, in
7 particular, support your opinion on licensing?

8 A. The fact that they're able to use
9 that -- that they're able to practice the patent.

10 Q. Anything else?

11 A. That's what comes to mind.

12 Q. Okay. Do you know if there's
13 payments made pursuant to these licenses?

14 MR. WOLTER: Object to the question,
15 lack of foundation.

16 THE WITNESS: I don't remember what
17 the exact terms of the license were.

18 Q. (By Mr. Abdelnour) That includes
19 whether -- whether or not there were payments made,
20 right?

21 A. Right.

22 Q. Okay. Do you know how many patents
23 are conveyed by these licenses, beyond the 535
24 patent?

1 A. I thought it was just that family,
2 but I'm -- I am not -- I don't remember for sure.

3 Q. Do you know how many patents are in
4 that family?

5 A. I think -- I don't know, something
6 like 5 to 10, like -- but I don't remem -- I don't
7 remember for sure.

8 Q. Other than the Primos SurroundView
9 Blind, can you identify any other product that is
10 covered by any of the licenses?

11 A. I don't remember.

12 Q. Did you do anything to apportion the
13 license evidence between the 535 patent and any
14 other patents that may be covered by those
15 licenses?

16 A. My recollection is that the patents
17 in there were from the same family. And if there
18 were others, I did not do an apportionment for
19 that.

20 Q. Okay. But did you do anything to
21 apportion between the patents even of the same
22 family?

23 A. Well, those patents are covering the
24 same thing that they were using, so I didn't find

1 that necessary.

2 Q. And you reviewed the declaration of
3 Jay Scholes, right?

4 A. Yes.

5 Q. He's Outtech, right?

6 A. Yes.

7 Q. Okay. Do you know how much money
8 he's paid to Rugged Cross under the patent license?

9 A. I don't remember.

10 Q. Do you know if he's ever sold a
11 product under that license?

12 MR. WOLTER: Objection, lack of
13 foundation.

14 THE WITNESS: I don't remember.

15 Q. (By Mr. Abdelnour) Dr. Cameron,
16 would you agree with me that if someone has a
17 license to a patent, but has never used that
18 license and never paid anything for that license,
19 that it would not be evidence of non-obviousness,
20 fair?

21 A. No, I don't agree with that.

22 Q. Did you compare the cost to the
23 licensees of obtaining those licenses to the cost
24 of defending a patent lawsuit?

1 A. It wasn't my understanding that any
2 of the licensees were accused of patent
3 infringement, but I did not do any investigation
4 into how much it costs to defend against an
5 infringement lawsuit.

6 Q. Okay. Did you do anything to
7 determine whether the licenses were taken for
8 economic reasons unrelated to the merits of the
9 claims invention?

10 A. From what I reviewed, as I kind of
11 outlined, it appeared to me that it was the
12 patented characteristics that the licensees were
13 interested in.

14 Q. And you just don't know what they
15 paid for that, right?

16 A. I don't remember what that is; that's
17 correct.

18 Q. Do you know what consideration Rugged
19 Cross got in return in these license arrangements?

20 MR. WOLTER: Object to form, asked
21 and answered.

22 THE WITNESS: It's -- sorry. I don't
23 understand -- if there's a difference
24 between that last question, I don't -- then

1 I don't understand your question.

2 Q. (By Mr. Abdelnour) There's a
3 difference between my last question and what?

4 A. And the one you just asked.

5 Q. Well, I -- I -- I do think there's a
6 difference. So let -- let -- let -- let me it ask
7 it -- I'm going to ask a completely different
8 question.

9 A. Okay.

10 Q. And I want to focus on the licensees.
11 Do you know what consideration, if any, the
12 licensees got in return in these license
13 arrangements, in addition to the license?

14 A. I'm not sure, no.

15 Q. I mean, you'd need to read the
16 licenses to answer that question; isn't that fair?

17 A. I -- yes, I -- I mean, I'm not an
18 expert on contracts, but I presume that if you read
19 the license agreement, you could -- you would know
20 that, yes.

21 Q. Paragraphs 117 and 118 is your
22 testimony in your declaration on licensing,
23 correct?

24 A. I'm sorry. What was those numbers

1 again?

2 Q. 117 and 118.

3 A. Yes.

4 Q. And 118 sets forth your complete
5 analysis on the issue of licensing, correct?

6 A. Yeah, that -- those declarations
7 and the things referred to in it, yes. And
8 yeah -- and -- and I guess, again, my analysis of
9 the products and the claims.

10 Q. Because you're relying on the
11 testimony of others, would you agree that your
12 opinion depends upon the assumption that those
13 statements are truthful and correct, right?

14 A. Well, I also -- but I mean, I looked
15 at what was -- it's probably true for some of the
16 statements in there, but some of them are, I
17 guess -- that's probably not the only indication of
18 that. But in general, I -- I mean, obviously I
19 don't have any reason to believe there's things
20 that aren't truthful in there.

21 Q. You also have an opinion about
22 copying, right?

23 A. Correct.

24 Q. And that analysis is contained in

1 paragraphs 115 and 116, correct?

2 A. Correct.

3 Q. 115 sets forth your understanding of
4 the legal standard, right?

5 A. Yes.

6 Q. And 116 is your application of the
7 legal standard to the facts of this case, right?

8 A. Correct.

9 Q. And here you are relying on the
10 declaration of Christopher Seaton, right?

11 A. That's correct.

12 Q. Okay. In the second sentence of
13 paragraph 116, you state that, "It is my opinion
14 that competitors likely copied the Double Bull
15 SurroundView Blind." See that?

16 A. Yes.

17 Q. Well, which competitors?

18 A. I can't remember the names, but those
19 are outlined, I think, in the Seaton declaration.

20 Q. Which products were the results of
21 copying the Double Bull SurroundView Blind?

22 A. Those are -- the product names are
23 listed in the Seaton declaration.

24 Q. Which ones? I'm asking you. Do you

1 know?

2 A. Oh, not without going and looking in
3 there.

4 Q. Well, let me ask you this, which of
5 the products that Chris Seaton contends are copies
6 of the Double Bull Blind did you analyze?

7 A. So I looked at -- I don't remember
8 the names of the products, but I did look at the
9 products to see just, like, the pattern of the yarn
10 and things like that.

11 Q. Which products?

12 A. Those are listed -- again, I don't
13 remember the names, but those names are in the
14 Seaton declaration.

15 Q. They're not in your declaration,
16 correct?

17 A. I don't think I put the names in my
18 declaration, no.

19 Q. And your declaration doesn't say that
20 you analyzed those products in paragraph 116, does
21 it?

22 A. Well, it says that I looked at that
23 declaration.

24 Q. So, when you say you analyzed the

1 products that Chris Seaton identifies, what do you
2 mean you analyzed the products? Did you look at
3 physical hunting blinds?

4 A. I looked at photos.

5 Q. Which photos?

6 A. I don't remember the product names,
7 but those are listed in the Seaton declaration.

8 Q. Which photos?

9 A. I don't remember. I just remember I
10 had seen -- like, I seen pictures of the shape of
11 the weave.

12 Q. Okay. And when you made a comparison
13 of the shape of the weave of these products to
14 something else, did you write down your analysis
15 somewhere?

16 A. Not -- not beyond just saying that I
17 looked at what was in there, and it seemed to me
18 that -- that the -- those products were copied.

19 Q. Did you compare the claims of the 535
20 patent to any of these allegedly copied products?

21 A. I don't remember if I put, like, a
22 whole claim chart, but I was looking for the -- for
23 the things in the claim, yes.

24 Q. I'm -- I'm sorry. You said -- you

1 said -- you said the answer is yes, but you didn't
2 create a claim chart?

3 A. That's correct.

4 Q. All right. Did you write in -- did
5 you write down your comparison of the 535 patent
6 claims to any of these products anywhere?

7 A. I don't remember.

8 Q. Did you -- can you identify any
9 evidence of actual copying other than similarities
10 in physical products? Pictures of them, I mean.

11 A. Yeah -- that -- no, that's what I --
12 that's what I relied on, yes.

13 Q. Nothing else, right?

14 A. That's all I remember.

15 Q. Do you agree with me that other
16 manufacturers of hunting blinds could have
17 independently designed the mesh that they used?

18 MR. WOLTER: Objection, lack of
19 foundation.

20 THE WITNESS: I think that's
21 potentially possible, but not what I would
22 consider likely.

23 Q. (By Mr. Abdelnour) Dr. Cameron, what
24 analysis did you do to distinguish independent

1 developments from so-called copying?

2 A. So again, to me, based on the
3 similarity, it seems unlikely, but I acknowledge
4 that it's possible that -- it could be possible.

5 Q. I appreciate that. My question's a
6 little bit different. My question is, did you
7 undertake any analysis to distinguish independent
8 developments from so-called copying?

9 A. Well, I didn't see any evidence that
10 it was independently developed. If there are other
11 things out there that I haven't been able to review
12 that indicates that, then obviously that could
13 weigh in favor of that. But from what I looked at,
14 it didn't -- I did not see any indication of that.

15 Q. Did -- okay. Did you see any
16 affirmative indication of copying, other than
17 similarities in the product?

18 MR. WOLTER: Ob -- object to form.

19 THE WITNESS: Well, I mean, yes,
20 that's what I was basing on it -- basing it
21 on. And it seems, based -- to me, and based
22 on that, it seems unlikely that it was
23 independently developed.

24 Q. (By Mr. Abdelnour) What's that

1 opinion based on?

2 A. Again, just the photos that I looked
3 at.

4 Q. Recognizing that we don't know which
5 products we're even talking about or which photos
6 we're talking about, what about the photos of this
7 mesh indicated to you that it was likely a copy?

8 A. The thing that I remember, in
9 particular, was just the -- the -- like, the
10 pattern of the weave.

11 Q. What about the pattern of the
12 weave --

13 A. That it was --

14 Q. Can you be more specific?

15 A. That it was similar.

16 Q. Can you be more specific about what
17 was similar in the pattern of the weave?

18 A. Basically that the weave had, like, a
19 diagonal -- a diagonal yarn.

20 Q. Anything else?

21 A. That's the thing that comes to mind.

22 Q. And is it -- Dr. Cameron, is it your
23 opinion that any mesh that has a diagonal yarn
24 would be a copy of the Primos Double Bull Blind?

1 MR. WOLTER: Object to form and
2 beyond the scope.

3 MR. ABDELNOUR: No, it's not. Of
4 course it's not.

5 Q. (By Mr. Abdelnour) You can answer.

6 A. So that was an example of what I
7 remember being similar, obviously, the -- the
8 fact that it's the same type of, like, one-way
9 see-through material.

10 Q. Is it your opinion that any one-way
11 see-through mesh material would be an infringement
12 of the 535 patent?

13 A. No. Obviously, it would need to have
14 all the elements of the -- of the claims -- of one
15 of the claims.

16 MR. WOLTER: I'll object to that as
17 beyond scope.

18 Q. (By Mr. Abdelnour) Is it your
19 opinion that any one-way see-through material in a
20 hunting blind would be a copy of Rugged Cross?

21 A. So, like, as I mentioned, the ones
22 that I looked at did appear to be the case for me.

23 I also acknowledge that there
24 is -- you know, to me that's the most likely, but I

1 acknowledge that there's a possibility that it was
2 independently developed and that would hold...

3 Q. You have an opinion of unexpected
4 superior results, correct?

5 THE COURT REPORTER: I think she
6 might have froze. Are you frozen, Doctor?

7 THE WITNESS: (No audible response)

8 THE COURT REPORTER: Yup.

9 MR. WOLTER: Yeah.

10 THE WITNESS: I can't hear anyone.

11 THE COURT REPORTER: There -- can you
12 hear us now?

13 THE WITNESS: Oh, I can hear you now.

14 THE COURT REPORTER: Yeah, you were
15 frozen a little bit.

16 THE WITNESS: Okay. I can -- I can
17 hear you. Not anyone else, though, just
18 you.

19 THE COURT REPORTER: I -- somebody --
20 I think I'm the only one talking, so...

21 THE WITNESS: Okay.

22 Q. (By Mr. Abdelnour) Can you hear me?

23 A. Yes, I can. So you cut off in the
24 middle of your question there.

1 Q. Dr. Cameron, you have an opinion
2 related to unexpected superior results, correct?

3 A. Yes.

4 Q. And that opinion in your analysis is
5 contained in paragraphs 121 and 122 of your report,
6 right?

7 A. That's correct.

8 Q. And it's your opinion that it was
9 entirely reasonable for Chris Seaton to have not
10 expected -- have any expectation that application
11 to coatings to the scrim banner mesh material would
12 achieve the results he found, correct?

13 A. That's correct.

14 Q. And so what you're providing here is
15 your opinion that it was reasonable for Mr. Seaton
16 to have not expected the results that he obtained,
17 right?

18 A. Correct.

19 Q. You don't provide an opinion that the
20 results would have been unexpected to a person of
21 ordinary skill in the art, correct?

22 A. Well, I was trying to say both of
23 those. That's why I say, "as a person of ordinary
24 skill in the art."

1 Q. Is it your opinion that Chris Seaton
2 is a person of ordinary skill in the art at the
3 time of the invention of the 535 patent?

4 A. I don't remember exactly what his
5 background is, or what I want to -- when I was
6 writing this, I think I was just saying that -- or
7 what I meant by this sentence is that a person of
8 ordinary skill in the art wouldn't have that
9 expectation. And so that -- that was reasonable
10 that -- that Chris didn't either.

11 I think I did review his background
12 at the time, but I -- I just am not recalling it
13 right now. But if you want to look at that, I can
14 comment on that. I think, more than likely, he
15 was, but I would want to look at his -- his
16 background at that time just to double-check.

17 Q. No, I don't want to have you make
18 opinions on the fly, Dr. Cameron. I -- I just want
19 to know if you've conducted an analysis and
20 rendered an opinion whether Chris Seaton is a
21 person of ordinary skill in the art in this case,
22 yes or no.

23 A. (Witness perusing documents)
24 I don't remember right now if I wrote

1 that, meaning that Chris was a person of ordinary
2 skill in the art or not. This sentence, though,
3 definitely is saying that a person of ordinary
4 skill in the art wouldn't have had that
5 expectation, and that's probably why it was
6 reasonable for Chris to not have that expectation
7 either.

8 Q. Well, it doesn't say that, but
9 you're -- you're -- you're changing your testimony.

10 A. I'm not changing my testimony. I
11 think when I testified before, which is the same,
12 is that I don't remember exactly what his
13 background is. I explained the meaning of that
14 sentence to you, and said I was happy to look at
15 his background at the time of the invention if you
16 want me to comment further.

17 Q. Did you undertake any analysis to
18 ascertain whether the results that Mr. Seaton
19 describes would have been unexpected to a person of
20 ordinary skill in the art at the time of the
21 invention?

22 A. Yes.

23 Q. And what was that analysis? Is it
24 something outside of what you've written in

1 paragraph 122?

2 A. No.

3 Q. Okay. So then what was it?

4 A. I looked at what the coatings and
5 the mesh material were, and I thought about whether
6 a person of ordinary skill in the art would have
7 expected that to occur.

8 Q. In paragraph 122, you agree with me
9 that you don't reference the closest prior art for
10 evaluating unexpectedness, true?

11 A. I looked at what was being used
12 before that. I'm not sure what you mean.

13 Q. You don't reference, in paragraph
14 122, the closest prior art for evaluating
15 unexpectedness, correct?

16 A. Well, I -- I guess I referenced
17 the -- the declarations in that paragraph, and I
18 looked at the things that was referred to in those
19 declarations.

20 Q. But not the closest prior art, right?

21 A. I don't --

22 MR. WOLTER: Object.

23 THE WITNESS: I don't know what you
24 mean by that.

1 Q. (By Mr. Abdelnour) Dr. Cameron, you
2 did not evaluate unexpectedness relative to
3 Whybrew, correct?

4 A. Yes, I analyzed Whybrew.

5 Q. I know you analyzed Whybrew,
6 Dr. Cameron, but my question is different. Isn't
7 it true that you did not evaluate unexpectedness
8 using Whybrew as a reference point?

9 A. Whybrew is similar to -- I mean,
10 Whybrew is similar in that it has panels
11 that -- that block light, so you don't have that
12 360-degree seeing ability. So yes, I had in mind
13 things like Whybrew when I did that comparison.

14 Q. You just didn't write it down in
15 paragraph 122; we can agree on that, fair?

16 A. While I explained that it was not
17 a -- a mere degree of change relative, I didn't
18 write the word "Whybrew," if that's what you're
19 asking.

20 Q. You don't write the word "strength"
21 either, did you?

22 A. Correct.

23 Q. Okay. You didn't compare
24 unexpectedness to Whybrew or strength, correct?

1 A. I do -- I do -- yes, of course. I
2 mean, of course. Whybrew and strength, I have
3 discussed that at length in my declaration. And
4 the patented -- I mean, as I explained, the
5 patented invention is a huge change compared to
6 those.

7 Q. Now, in paragraph 122, you say -- you
8 state that Chris -- it went -- "It was reasonable
9 for Chris to have not expected that the material
10 would achieve the result he found," right?

11 A. Correct.

12 Q. What result did he find that was
13 unexpected?

14 A. That you could easily have a
15 360-degree view from inside the blind.

16 Q. Is it your recollection that Chris
17 Seaton's testimony was that the unexpected result
18 was that he could achieve a 360-degree view from
19 inside the blind?

20 A. Yes.

21 Q. Isn't it true that Mr. Seaton's
22 testimony was that the unexpected result was the
23 one-way see-through effect?

24 A. Yeah. That was implicit in my

1 answer, that the 360 ability to have that be
2 everywhere, yes.

3 Q. The one-way see-through effect could
4 give rise to a 360-degree view from inside a blind,
5 right; that's your testimony?

6 MR. WOLTER: Object to form.

7 THE WITNESS: Can you repeat that
8 question?

9 Q. (By Mr. Abdelnour) Yeah. The
10 360-degree view from inside the blind could be
11 a result of using the one-way mesh, one-way
12 see-through effect, right?

13 A. So I'm not sure I'm under -- I'm not
14 sure I'm understanding your question. But it
15 has -- it has the -- you can see 360 from the
16 inside, and you can't see anywhere from the
17 outside, or you can't see inside from the outside
18 anywhere.

19 Q. You agree that discovery of a one-way
20 see-through effect is not the same as discovery of
21 a 360-degree view from inside a blind; they're
22 different, right?

23 A. They're different, but that is what I
24 meant when I said that.

1 Q. Okay. So when did Chris Seaton first
2 discover the one-way see-through effect?

3 MR. WOLTER: Object to form.

4 THE WITNESS: I don't -- I don't
5 remember a specific date.

6 Q. (By Mr. Abdelnour) When did Chris
7 Seaton first come up with a 360-degree view from
8 inside of a blind?

9 A. Again, I don't remember the specific
10 date.

11 Q. Did they happen at the same time or
12 different times, Dr. Cameron?

13 MR. WOLTER: Object to form.

14 THE WITNESS: (No audible response)

15 Q. (By Mr. Abdelnour) Do you know?

16 A. I think it's at the same time, yeah.

17 Q. And what time was that?

18 A. I don't -- as I said, I don't
19 remember the exact date.

20 Q. You're familiar with the claims of
21 the 535 patent, right?

22 A. Yes.

23 Q. Claim 1 of the 535 patent is not
24 limited to blinds having a 360-degree view from

1 inside of them, correct?

2 A. (Witness perusing documents)

3 Correct.

4 Q. In fact, the only claim that refers
5 to a 360-degree view inside of a blind is Claim 14,
6 true?

7 MR. WOLTER: Object to form.

8 THE WITNESS: I would need to go back
9 and look through the claims, but that might
10 be true.

11 Q. (By Mr. Abdelnour) Did you evaluate
12 whether it would have been unexpected for Chris
13 Seaton to discover a one-way see-through effect of
14 the mesh he created?

15 A. That's what we just talked about.
16 I -- I do think that was unexpected.

17 Q. Do you believe that the one-way
18 see-through effect that Mr. Seaton says he
19 discovered would have been unexpected in view of
20 Whybrew, strength?

21 A. Yes.

22 Q. And is that just -- again, is that
23 the analysis that's not written down and claimed in
24 paragraph 122?

1 A. Well, it might not be in 122, but I
2 have quite a long explanation of those two
3 references.

4 Q. But not in the context of unexpected
5 (indiscernible) --

6 MR. WOLTER: Object to form. Oh, was
7 that a question?

8 MR. ABDELNOUR: Yeah.

9 THE COURT REPORTER: I actually --

10 MR. ABDELNOUR: A question.

11 THE COURT REPORTER: I was going
12 to -- I -- I -- I didn't hear it. Could you
13 repeat it? You kind of moved away from the
14 microphone a little bit.

15 Q. (By Mr. Abdelnour) That -- that's
16 not in the context of unexpected results, correct?

17 A. I think I gave it a lengthy
18 explanation of those references.

19 And then I also explained that a
20 person of ordinary skill in the art would have
21 found that unexpected, and that includes -- that
22 includes the -- in light of the teaching in -- in
23 both of those references.

24 Q. Do you recall, when Mr. Seaton

1 discovered this one-way see-through mesh, that he
2 was building a hunting blind for his son; do you
3 recall that testimony?

4 A. Yes.

5 Q. And are you familiar with that
6 hunting blind that he built for his son?

7 A. I can't recall if I looked at a
8 picture of that or not.

9 Q. Okay. Do you recall Mr. Seaton's
10 testimony that he displayed his hunting blind at a
11 trade show in 2016; do you recall that?

12 A. Yes.

13 Q. Do you recall -- are you familiar
14 with the hunting blind that he displayed then?

15 A. Yes, that one I remember there being
16 pictures of.

17 Q. There are YouTube videos that he had
18 links to in his declaration; do you remember that?

19 A. Correct.

20 Q. Do you -- did you watch those YouTube
21 videos?

22 A. Yes.

23 Q. Okay. You -- you -- you're familiar
24 with the structure of that hunting blind, correct?

1 A. Yes.

2 Q. That hunting blind that he displayed
3 in 2016 was not a pop-up blind, correct?

4 A. I think that's correct.

5 Q. Can you tell me when, if at all,
6 Mr. Seaton ever developed a hunting blind that was
7 a pop-up blind?

8 MR. WOLTER: Objection, beyond scope.

9 THE WITNESS: I don't recall seeing
10 one that he built that was a pop-up.

11 Q. (By Mr. Abdelnour) Do you agree with
12 me that the hunting blind that Mr. Seaton displayed
13 in 2016 is not covered by the claims of the 535
14 patent because it is not a pop-up blind?

15 A. That's just my recollection sitting
16 here right now; it's not a pop-up. And if it
17 doesn't have a pop-up frame, then it wouldn't be
18 covered by the claims that require a pop-up frame.

19 Q. You have an opinion on long-felt
20 need, correct?

21 A. Correct.

22 Q. What is the long-felt need?

23 A. Basically, the long-felt need is
24 that, you know, you have that -- you're in the

1 blind and you are able to have it unrestricted.
2 And if you're in it, it doesn't require you to,
3 like, move around, and, of course, like, not be
4 seen from the outside.

5 Q. Is the long-felt need a technological
6 long-felt need?

7 MR. WOLTER: Object to form.

8 THE WITNESS: Yes.

9 Q. (By Mr. Abdelnour) How so?

10 A. Because that was something people
11 wanted and they don't -- didn't have it before.
12 I'm -- I'm not sure what you're asking.

13 Q. Well, you described a -- a -- a
14 functional need that consumers would be interested
15 in. But my question is, was there a technological
16 need to develop a particular type of material or
17 structure?

18 A. I'm not understanding that question.
19 Sorry.

20 Q. Do you have any evidence that there
21 was a long-felt need for one-way viewing materials?

22 A. Well, that's part of what I just
23 described.

24 Q. What's your evidence?

1 A. Based on the declarations and the
2 articles and things that I reviewed from those
3 declarations.

4 Q. In addressing long-felt need, you
5 agree with me that you did not cite to any prior
6 art references describing the long-felt need,
7 right?

8 A. Not beyond what was in the -- cited
9 to in the declarations, no.

10 Q. Did you cite to any publications
11 prior to Chris Seaton's discovery in 2016 that
12 articulates this long-felt need?

13 A. Well, some of the documents may have
14 been after, but they were discussing what was
15 before.

16 Q. Okay. So set aside the documents and
17 materials that are dated after. Are there any
18 documents that precede Mr. Seaton's 2016 discovery
19 that articulate this long-felt need?

20 A. So I don't recall if there was any
21 that had a date before, but, typically, I was,
22 like, looking at ones that were contrasted before
23 and after, which would necessarily mean the date
24 was after.

1 Q. Outside of your review of the
2 declarations and anything attached thereto, did you
3 do any other analysis in reaching your opinion on a
4 long-felt need?

5 A. I think I did look at some other
6 similar material, but I didn't see anything that
7 wasn't re -- already captured by the things that
8 were cited in the declaration, so I didn't put any
9 citations to those.

10 Q. * Do you agree, Dr. Cameron, that
11 there was not a long-felt need for a mesh fabric
12 window that allows an occupant within a blind to
13 see outwardly there through, while animals or other
14 observers outside the blind cannot see into it?

15 A. (Witness perusing documents)
16 Can you read -- I think I agree with
17 that, but can you just read that back, please?

18 MR. ABDELNOUR: Christine, please
19 read it back.

20
21 * (Partial question read)

22
23 THE COURT REPORTER: Are you saying
24 felt? F-E-L-T?

1 MR. ABDELNOUR: Yes.

2 THE COURT REPORTER: Okay.

3 MR. ABDELNOUR: Yes, felt.

4 THE COURT REPORTER: I was going to
5 ask that afterward, but I'll start again.

6

7 * (Question read)

8

9 THE WITNESS: I would agree with
10 that.

11 THE COURT REPORTER: Did you say I
12 agree with that or I don't?

13 THE WITNESS: Yes, agree.

14 THE COURT REPORTER: Okay.

15 Q. (By Mr. Abdelnour) Do you agree that
16 by 2016, it would not have been unexpected to
17 achieve a one-way vision characteristic of a mesh
18 fabric window in the context of a hunting blind?

19 A. If by that you mean, like, the setup
20 like you see in Whybrew -- was it Whybrew? Wait.
21 Let me just make sure. I get those mixed up.
22 Yeah, Whybrew. If you just mean like Whybrew,
23 where they have -- you can see out of, like, a
24 mesh window, but you -- but the other ones are

1 light-blocking the other panels, and, you know,
2 I -- obviously I agree that that's already
3 disclosed in Whybrew.

4 MR. ABDELNOUR: We've been going a
5 long time. Let's take a 10-minute break.

6
7 (A recess was taken)

8
9 THE COURT REPORTER: Go ahead.

10 Q. (By Mr. Abdelnour) At paragraph 112,
11 you have a claim chart comparing the Primos Double
12 Bull SurroundView Blinds to the claims of the 535
13 patent, correct?

14 A. Correct.

15 Q. And you agree with me that the Primos
16 Double Bull SurroundView product is the only
17 product that you charted against any claims of the
18 535 patent, right?

19 A. That is the only one I made this
20 chart for, yes.

21 Q. That's the only one you made a chart
22 for, right?

23 A. Right.

24 Q. And -- and starting at paragraph 107,

1 you've got an opinion that the Primos Double Bull
2 SurroundView Blinds have been commercially
3 successful, correct?

4 A. Yes.

5 Q. Is it your opinion that the
6 commercial success you attribute to the Double
7 Bull SurroundView Blinds weighs in favor of
8 non-obviousness?

9 A. Yes.

10 Q. What is your basis for asserting that
11 the Primos Double Bull SurroundView Blind is
12 commercially successful?

13 A. I reviewed the documents, and the
14 declarations that I cited.

15 Q. Okay. Can you be more specific?

16 A. That I reviewed the documents that
17 talked about the commercial success.

18 Q. And how did you arrive at the opinion
19 that the SurroundView was, in fact, commercially
20 successful?

21 A. By reviewing the declaration and the
22 documents cited within.

23 Q. What about the declaration and
24 documents that you reviewed indicated to you that

1 the Primos SurroundView Blind was commercially
2 successful?

3 A. The documents I reviewed talked
4 about, basically, how much better -- better it was.

5 Q. Can you be more specific?

6 A. Yeah. It talked about, basically,
7 the one-way see-through ability and things like
8 that.

9 Q. Okay. Anything else?

10 A. That's what I remember the most.

11 Q. All right. And what does "commercial
12 success" mean to you in this context?

13 A. That -- you know, that it's been
14 accept -- it's getting accepted in the marketplace.

15 Q. In paragraph 108 you referred to
16 increased sales; do you see that?

17 A. What number?

18 Q. 108.

19 A. Yes, I see that.

20 Q. What do you mean by "increased
21 sales"?

22 A. That once they had the patented
23 feature, they were more successful in the
24 marketplace, so they had more sales.

1 Q. Can you be more specific?

2 A. No. I don't know what you mean.

3 Q. Well, let me try to unpack that a
4 little bit so I can understand what you mean.

5 A. Okay.

6 Q. Sales increased relative to what?

7 A. Just that they were increasing, like
8 their market share, generally.

9 Q. Whose sales are you referring to?
10 Primos?

11 A. Well, yeah, so their sales compared
12 to the market, yes.

13 Q. Okay. Did you review sales numbers
14 for the Primos Double Bull SurroundView Blinds?

15 A. I don't remember what the specific
16 numbers are, but I reviewed the Harris -- like, I
17 think it was the Harris declaration that talks
18 about that.

19 Q. Well, in paragraph 108, you say you
20 reviewed the declaration of Jason Harris, right?

21 A. What number? One -- oh -- did you
22 say 108?

23 Q. Yeah.

24 A. Yes.

1 Q. Okay. Dr. Cameron, did you review
2 any sales numbers on the Primos Double Bull
3 SurroundView Blinds?

4 A. If they were referenced in that
5 declaration, then I did, yes.

6 Q. Sitting here today, can you tell me,
7 yes or no, whether you reviewed any sales numbers
8 of the SurroundView Blinds?

9 A. If they were in that declaration,
10 then I did.

11 Q. And if they weren't in there, then
12 you didn't, fair?

13 A. I didn't -- that's fair, yes.

14 Q. Did you review sales numbers of any
15 hunting blinds?

16 THE COURT REPORTER: Did you say any
17 hunting blinds?

18 MR. ABDELNOUR: Yes.

19 THE COURT REPORTER: Okay.

20 THE WITNESS: I don't remember if I
21 looked at the sales numbers or not, but if
22 they were in -- referred to in the
23 declarations that I reviewed, then I did
24 look at them.

1 Q. (By Mr. Abdelnour) Did you review
2 any market share data?

3 A. I don't remember looking at, like,
4 specific numbers for that, but if it was in those
5 declarations, then I did look at it.

6 Q. Can you tell me how many units of the
7 Primos SurroundView Blinds were sold in its first
8 year?

9 A. I don't recall that offhand.

10 Q. How about in its second year on the
11 market?

12 A. I don't remember those specific
13 numbers offhand.

14 Q. You're aware that Primos had Double
15 Bull Blinds before the SurroundView Blinds, right?

16 A. Yes.

17 Q. Do you know the unit sales of prior
18 Double Bull Blinds?

19 A. I don't remember those numbers
20 offhand.

21 Q. Do you know the market share of prior
22 Double Bull Blinds?

23 A. I don't remember those numbers
24 offhand.

1 Q. Do you know the profit margin for the
2 SurroundView Blinds?

3 A. I don't remember.

4 Q. Do you know the profit margin for the
5 Double Bull Blinds that predated the SurroundView
6 Blinds?

7 A. I don't remember.

8 Q. Did you consider, when forming your
9 opinion, the relative marketing spend on the
10 SurroundView Blinds relative to other Primos
11 hunting blinds?

12 A. I don't remember the numbers offhand.

13 Q. Did you review any data about the
14 advertising spent on these different blinds?

15 A. If it was in -- whatever was in the
16 declarations and what they referred to, I reviewed,
17 and if it's not in there, then I didn't review it.

18 Q. Now, did you ask Mr. Harris or the
19 Rugged Cross attorneys for any sales information
20 related to the SurroundView Blinds?

21 A. I don't remember if I did that or
22 not.

23 Q. Did you review pricing information
24 for the SurroundView Blinds?

1 A. Again, if that was cited to in any of
2 the declarations that I did look at, yup,
3 otherwise, I did not.

4 Q. What about pricing information for
5 any other Primos blinds? Same answer?

6 A. Yes.

7 Q. Okay. Can we agree that the only
8 commercial success that you rely upon in this case
9 is that due to the Primo SurroundView Blinds?

10 A. I think I discussed other products
11 besides that in my declaration, or -- but that one
12 is the only one I made a chart for, but I -- I did
13 look at the other products that were cited in the
14 declaration.

15 Q. Okay. But my question is -- is a lot
16 more specific. My question is, are you relying on
17 commercial success of any blind outside of the
18 SurroundView Blinds?

19 MR. WOLTER: Object to form.

20 THE WITNESS: Yeah, so in the
21 declarations there was other products that
22 were discussed as well, just they were not
23 one that I charted.

24 Q. (By Mr. Abdelnour) Can you point me

1 to where in your declaration you discussed the
2 commercial success of any blind other than the
3 SurroundView Blinds?

4 A. (Witness perusing documents)

5 Q. By paragraph.

6 A. I'm looking. Hold on.

7 (Witness perusing documents)

8 In wh -- it seems like that might be
9 the only one I call out, but there are definitely
10 others that are mentioned in the -- in the
11 declarations.

12 Q. So in terms of your formation of your
13 opinion, it's just the SurroundView Blinds, right?

14 A. I did look at the other ones that
15 were in the declaration, but I think, in terms of
16 the ones that I call out here and do the chart for,
17 it would just be the double view -- or surround --
18 SurroundView.

19 Q. Do you have any knowledge whether
20 Primos discontinued a hunting blind at the same
21 time that it introduced the SurroundView Blind?

22 A. I don't remember if they stopped
23 selling their previous product or not.

24 Q. Outside of the one-way see-through

1 mesh material, is there anything about the
2 SurroundView Blind that was the basis for any
3 supposed commercial success?

4 A. I mean, for me, it's really the
5 combination of that with the -- you know, it being
6 in the hunting blinds, the kind of the other parts
7 of the claim, but that -- that's certainly a large
8 part of it.

9 Q. How did you apportion this commercial
10 success that you found between the claims of the
11 535 patent and the claims of any other Rugged Cross
12 patent?

13 MR. WOLTER: Object to form.

14 THE WITNESS: I guess that goes back
15 to my answer before, is that I thought that
16 the other patents were in the same -- the
17 same family. I didn't do an analysis if
18 there was other patents outside of that in
19 the license agreement.

20 Q. (By Mr. Abdelnour) Did you conduct a
21 nexus analysis, Dr. Cameron?

22 A. I mean, yes, that was kind of
23 the -- part of the point of putting the chart in
24 the discussion there.

1 Q. And your nexus analysis is contained
2 at paragraphs 123 to 125, correct?

3 A. Yes.

4 Q. And paragraphs 123 and 124 are the
5 legal standard that you applied, right?

6 A. Yes.

7 Q. And paragraph 125 contains your
8 complete analysis of nexus, right?

9 A. Well, in the chart -- in the charts,
10 of course.

11 Q. But paragraph 125, plus the claim
12 chart of the SurroundView Blind, is your entire
13 analysis of nexus, right?

14 A. And if there's any other discussion,
15 like, right by the charts.

16 Q. You mean in the same paragraph?

17 A. In the same section, yeah.

18 Q. Isn't it true that the only
19 difference between the Primo SurroundView Blind and
20 the prior Double Bull Blinds is the introduction of
21 this one-way mesh?

22 MR. WOLTER: Object to form and lack
23 of foundation.

24 THE WITNESS: I think the in --

1 incorporation of that mesh into the
2 structure is the primary difference. I
3 don't recall if there's another -- other
4 minor differences.

5 Q. (By Mr. Abdelnour) Dr. Cameron, are
6 you better suited to assess secondary
7 considerations' evidence than the declarants upon
8 whom you rely?

9 A. I -- I really wasn't really comparing
10 myself to -- to other people. Like, for me, I just
11 reviewed the evidence and the claims.

12 Q. Let's take Robert Ranson. Recall his
13 testimony?

14 A. Generally, yes.

15 Q. Do you recall who he is?

16 A. I think he is -- actually, I don't
17 remember exactly who he is right now. I think he
18 was one of the -- I think he was one of the...

19 Q. Well, he worked at Ameristep for a
20 great number of years. Do you recall that?

21 A. Yes, I think that's correct. I think
22 he was one of -- what was the -- what was the name
23 again?

24 Q. Ranson.

1 A. Ranson, yes. So he was -- I think he
2 was one of the people that licensed the technology,
3 if I'm remembering the names correctly.

4 Q. Mr. Ranson had been in the hunting
5 industry for many years, correct?

6 A. Yes.

7 Q. Okay. And has been involved in the
8 sale of hunting blinds, right?

9 A. Correct.

10 Q. The introduction of hunting blinds,
11 right?

12 A. Correct.

13 Q. Okay. So is it your belief that you
14 are better suited than Mr. Ranson to testify
15 regarding secondary considerations?

16 A. Again, I didn't really compare myself
17 to -- to other people. For me, I just reviewed the
18 evidence that was there, and then -- and then
19 looked for the nexus and compared the claims to the
20 products and things like that.

21 Q. Okay. I understand you haven't done
22 this before. But I'm asking you right now, if you
23 can make an assessment, is it -- are you better
24 suited to testify about secondary considerations

1 than Mr. Ranson?

2 A. I don't --

3 MR. WOLTER: Object to the form,
4 asked and answered for the third time.

5 THE WITNESS: I don't have an opinion
6 on that. I don't really compare myself to
7 other people like that.

8 Q. (By Mr. Abdelnour) Do you contend
9 that you are an expert in the area of secondary
10 considerations as it pertains to the hunting
11 industry and hunting blinds?

12 THE COURT REPORTER: The hunting what
13 and hunting blinds?

14 MR. ABDELNOUR: Hunting industry.

15 THE WITNESS: Yes. In the context
16 here, yes, I consider myself an expert, and
17 I'm able to provide opinion of my review of
18 those things.

19 Q. (By Mr. Abdelnour) And what is that
20 expertise based upon?

21 A. That's based on my -- my background,
22 my education, and my professional experience.

23 Q. I -- I understand that, but
24 specifically, what experience and credentials are

1 you calling upon that you consider yourself an
2 expert in the field of secondary considerations for
3 hunting blinds?

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

6 THE WITNESS: So my expertise is
7 based on my understanding of the technology
8 and my experience with similar technology
9 and, like, my ability to compare that to
10 what's in the claims.

11 MR. ABDELNOUR: Okay. Let -- let --
12 let's -- let's take a five-minute break. I
13 just want to take a look at my notes, and
14 then we can wrap up pretty quickly. Okay?

15 THE WITNESS: Okay.

16

17 (A recess was taken)

18

19 THE COURT REPORTER: Okay. Go ahead.

20 MR. ABDELNOUR: Okay. I have no
21 further questions. Thank you very much.

22 MR. WOLTER: I have no questions
23 either.

24 THE COURT REPORTER: Okay. So I

1 guess there's no tomorrow?

2 MR. WOLTER: There's a tomorrow;
3 we're just not doing depositions.

4 THE COURT REPORTER: I just have a
5 couple more spellings from today.

6
7 (Off record discussion)

8
9 THE COURT REPORTER: So who needs a
10 copy? You both want a copy of the
11 transcript?

12 MR. ABDELNOUR: Yes, please.

13 MR. WOLTER: Yes.

14 THE COURT REPORTER: Okay. Got it.
15 PDF okay for both of you?

16 MR. ABDELNOUR: Yes.

17 THE COURT REPORTER: Okay.

18
19 (Deposition completed at 4:08 p.m.)

20

21

22

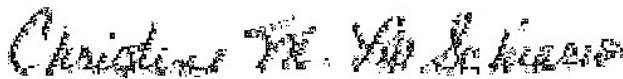
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24

1 I, CHRISTINE M. LO SCHIAVO, Notary Public,
2 do hereby certify that DR. KIMBERLY CAMERON
3 remotely appeared before me, via Zoom, and
4 satisfactorily identified herself on the 6th day of
5 November, 2024, and was duly sworn by me to testify
6 to the truth and nothing but the truth as to her
7 knowledge touching and concerning the matters in
8 controversy in this cause; that she was thereupon
9 examined upon her oath and said examination reduced
10 to writing by me; and that the statement is a true
11 record of the testimony given by the witness, to
12 the best of my knowledge and ability.

13 I further certify that I am not a relative
14 or employee of counsel/attorney for any of the
15 parties, nor a relative or employee of such
16 parties, nor am I financially interested in the
17 outcome of the action.

18 WITNESS MY HAND this 15th day of November,
19 2024.

20 
21

22
23 Christine M. Lo Schiavo My Commission Expires:
24 Notary Public April 13, 2029

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
Inter Partes Review No.: IPR2024-00291

* * * * *

DBR FINANCE, INC., *

Petitioner *

v. *

RUGGED CROSS HUNTING BLINDS, LLC., *

Patent Owner *

* * * * *

I, DR. KIMBERLY CAMERON, do hereby certify,
under the pains and penalties of perjury, that the
foregoing testimony is true and accurate, to the best
of my knowledge and belief.

WITNESS MY HAND, this ___ day of _____ 2024.

DR. KIMBERLY CAMERON

1 CORRECTION SHEET

2 DEPONENT: Dr. Kimberly Cameron

3 CASE: DBR Finance, Inc. v.

4 Rugged Cross Hunting Blinds, LLC

5 DATE TAKEN: November 6, 2024, Volume II

6 *****

7 PAGE / LINE / CHANGE OR CORRECTION AND REASON

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19 ____/____/____

20 ____/____/____

21 ____/____/____

22 ____/____/____

23 ____/____/____

24 ____/____/____

1 1 176:23 10 156:6 10-minute 185:5 100 136:19 105 151:8, 22 106 153:3 107 185:24 108 187:15, 18 188:19, 22 112 185:10 115 161:1, 3 116 161:1, 6, 13 162:20 117 159:21 160:2 118 159:21 160:2, 4 121 169:5 122 169:5 172:1, 8, 14 173:15 174:7 177:24 178:1	123 195:2, 4 124 195:4 125 152:2 195:2, 7, 11 14 177:5 2 20 152:3, 19 2016 179:11 180:3, 13 182:11, 18 184:16 2024 135:19 3 300 136:17 360 175:1, 15 360-degree 173:12 174:15, 18 175:4, 10, 21 176:7, 24 177:5 4 40 136:16 4:08 200:19	5 5 135:19 156:6 50 142:22 535 143:8, 13, 18 144:4, 10, 15 146:22 147:8, 12, 17, 23 148:4, 9, 13 149:1, 5, 18 151:2 155:23 156:13 163:19 164:5 167:12 170:3 176:21, 23 180:13 185:12, 18 194:11 7 75 138:9, 19, 20 140:8 142:22 143:1 78 142:13, 21 143:3, 5 146:11 A Abdelnour 134:11 135:1 136:11 137:15 139:24 140:2, 7 141:13, 20	144:23 145:21, 24 146:10 148:18 150:13, 21 152:12 153:2 154:23 155:18 157:15 159:2 164:23 165:24 167:3, 5, 18 168:22 173:1 175:9 176:6, 15 177:11 178:8, 10, 15 180:11 181:9 183:18 184:1, 3, 15 185:4, 10 189:18 190:1 192:24 194:20 196:5 198:8, 14, 19 199:11, 20 200:12, 16 ability 173:12 175:1 187:7 199:9 able 155:8, 9 165:11 181:1 198:17 accept 187:14 accepted 187:14 accused 158:2 achieve 169:12 174:10, 18 184:17
---	---	---	--

acknowledge 165:3 167:23 168:1	145:19 185:9 199:19	153:19 154:12 159:16 164:1 167:5 175:1 192:5 194:15	182:6
acrylate 141:22	air 140:11 143:19	answered 149:21 158:21 198:4	articles 182:2
acted 147:23	airflow 143:24 144:5, 14	anyone 168:10, 17	articulate 182:19
acting 149:22 150:2	allegedly 163:20	appeared 158:11	articulates 182:12
actual 155:2 164:9	allow 140:11 147:10	application 161:6 169:10	ascertain 171:18
addition 159:13	allows 183:12	applied 195:5	asked 135:9 145:6 158:20 159:4 198:4
addressing 182:4	Ameristep 196:19	apportion 156:12, 21 194:9	asking 137:5 161:24 173:19 181:12 197:22
advertising 191:14	analysis 137:1 140:20 153:15 154:4 160:5, 8, 24 163:14 164:24 165:7 169:4 170:19 171:17, 23 177:23 183:3 194:17, 21 195:1, 8, 13	apportionment 156:18	asserting 186:10
affirmative 165:16	analyze 162:6	appreciate 134:9 165:5	assess 144:2, 5 196:6
afterward 184:5	analyzed 162:20, 24 163:2 173:4, 5	Approximately 136:11	assessment 197:23
agree 134:7, 11, 12, 15 141:6 142:7 157:16, 21 160:11 164:15 172:8 173:15 175:19 180:11 182:5 183:10, 16 184:9, 12, 13, 15 185:2, 15 192:7	animals 183:13	area 198:9	assumption 160:12
agreement 159:19 194:19	answer 138:16 149:15 150:5, 13 152:13	around 139:18 181:3	attached 183:2
ahead 139:4 140:6		arrangements 158:19 159:13	Attorney 134:14
		arrive 186:18	attorneys 191:19
		art 169:21, 24 170:2, 8, 21 171:2, 4, 20 172:6, 9, 14, 20 178:20	attribute 186:6
			audible 168:7 176:14
			aware 190:14

B back 135:3 138:11 141:14 142:16, 17 144:24 149:24 150:20 177:8 183:17, 19 194:14 background 170:5, 11, 16 171:13, 15 198:21 banner 169:11 base 141:9 142:13 143:6 based 140:16, 20, 21 153:4 165:2, 21 166:1 182:1 198:20, 21 199:7 basically 166:18 180:23 187:4, 6 basing 165:20 basis 186:10 194:2 begin 134:22 belief 197:13 believe	150:1 160:19 177:17 besides 142:22 192:11 better 187:4 196:6 197:14, 23 bit 165:6 168:15 178:14 188:4 blind 156:9 161:15, 21 162:6 166:24 167:20 174:15, 19 175:4, 10, 21 176:8 177:5 179:2, 6, 10, 14, 24 180:2, 3, 6, 7, 12, 14 181:1 183:12, 14 184:18 186:11 187:1 192:17 193:2, 20, 21 194:2 195:12, 19 blinds 163:3 164:16 176:24 185:12 186:2, 7 188:14 189:3, 8, 15, 17 190:7, 15, 18, 22 191:2, 5, 6, 10, 11, 14, 20, 24 192:5, 9, 18 193:3, 13	194:6 195:20 197:8, 10 198:11, 13 199:3 block 173:11 bottom 146:10 break 185:5 199:12 bringing 139:8 broad 146:22 147:2 broadens 146:14 building 179:2 built 179:6 180:10 Bull 161:14, 21 162:6 166:24 185:12, 16 186:1, 7, 11 188:14 189:2 190:15, 18, 22 191:5 195:20 C calculate 143:16 call 193:9, 16 calling 199:1 Cameron 134:10, 17 135:3 137:15	139:1 140:8 149:11 152:18 153:2 157:15 164:23 166:22 169:1 170:18 173:1, 6 176:12 183:10 189:1 194:21 196:5 canceled 139:12 captured 183:7 case 137:20 154:4 161:7 167:22 170:21 192:8 certainly 194:7 change 150:2 173:17 174:5 changing 171:9, 10 characteristic 184:17 characteristic s 158:12 characterized 146:20 chart 163:22 164:2 185:11, 20, 21 192:12 193:16 194:23 195:9, 12
--	---	--	--

charted 185:17 192:23	177:4, 5 185:11 194:7 195:11	193:2 194:3, 9	consider 164:22 191:8 198:16 199:1
charts 195:9, 15	claimed 177:23	commercially 186:2, 12, 19 187:1	consideration 153:4, 5 158:18 159:11
checking 152:1	claims 148:3, 12 158:9 160:9 163:19 164:6 167:14, 15 176:20 177:9 180:13, 18 185:12, 17 194:10, 11 196:11 197:19 199:10	compare 157:22 163:19 173:23 197:16 198:6 199:9	considerations 150:12, 15 151:1 152:5 153:11 154:1 197:15, 24 198:10 199:2
Chris 153:6 162:5 163:1 169:9 170:1, 10, 20 171:1, 6 174:8, 9, 16 176:1, 6 177:12 182:11		compared 174:5 188:11 197:19	considerations ,
Christine 144:23 145:14, 21 146:8 183:18	clear 148:3, 11, 19 149:1	comparing 185:11 196:9	196:7
Christopher 161:10	closest 172:9, 14, 20	comparison 163:12 164:5 173:13	considered 147:12
citation 137:20	coating 141:9, 21	competitors 161:14, 17	construction 148:20
citations 136:23 137:3, 6, 7, 14, 16, 24 183:9	coatings 169:11 172:4	complete 160:4 195:8	consumers 181:14
cite 182:5, 10	combination 194:5	completed 200:19	contained 151:15 152:14 160:24 169:5 195:1
cited 152:3 182:8 183:8 186:14, 22 192:1, 13	come 176:7	completely 159:7	contains 195:7
claim 148:20 149:7, 19 163:22, 23 164:2 176:23	comes 155:11 166:21	comport 142:14 143:6	contend 198:8
	comment 170:14 171:16	comports 144:3	contends 162:5
	commercial 154:22 186:6, 17 187:11 192:8, 17	computer 139:19	context 143:7, 13, 18 144:4, 7, 8, 10, 15 146:22 147:7 148:20 151:2 178:4, 16 184:18 187:12
		conducted 170:19	
		confused 139:7	

198:15 contracts 159:18 contrasted 182:22 conveyed 155:23 copied 161:14 163:18, 20 copies 162:5 copy 166:7, 24 167:20 200:10 copying 160:22 161:21 164:9 165:1, 8, 16 correct 137:21 138:7, 8 140:13, 14, 18 141:23, 24 142:1 143:10, 11 144:6, 12, 20 145:7 147:21 153:7, 11 158:17 159:23 160:5, 13, 23 161:1, 2, 8, 11 162:16 164:3 168:4 169:2, 7, 12, 13, 18, 21 172:15 173:3, 22, 24 174:11 177:1, 3 178:16	179:19, 24 180:3, 4, 20, 21 185:13, 14 186:3 195:2 196:21 197:5, 9, 12 correctly 197:3 cost 157:22, 23 costs 158:4 couple 200:5 course 167:4 174:1, 2 181:3 195:10 COURT 134:1, 13, 21 139:22 140:1, 6 145:1, 5, 10, 15, 17, 20, 23 146:2, 9 168:5, 8, 11, 14, 19 178:9, 11 183:23 184:2, 4, 11, 14 185:9 189:16, 19 198:12 199:19, 24 200:4, 9, 14, 17 cover 144:1 coverage 141:9 149:7 covered 148:4 156:10, 14	180:13, 18 covering 156:23 create 164:2 created 177:14 credentials 198:24 criticism 146:11 Cross 135:12 154:17, 24 157:8 158:19 167:20 191:19 194:11 Cross's 135:6 cut 168:23 cutoff 147:19 D data 190:2 191:13 date 135:13 136:6 176:5, 10, 19 182:21, 23 dated 135:18 182:17 day 135:5 days 135:22	declarants 196:7 declaration 135:18, 22 136:22 137:6, 11, 14, 16, 17 138:1, 6, 10 142:19 154:21 157:2 159:22 161:10, 19, 23 162:14, 15, 18, 19, 23 163:7 174:3 179:18 183:8 186:21, 23 188:17, 20 189:5, 9 192:11, 14 193:1, 15 declarations 153:6, 13 160:6 172:17, 19 182:1, 3, 9 183:2 186:14 189:23 190:5 191:16 192:2, 21 193:11 defend 158:4 defending 157:24 defining 147:24 definitely 171:3 193:9 degree 173:17 Dennis 153:1
---	---	---	---

density 141:19 142:5 147:10, 16	differences 196:4	193:1	E
depends 160:12	different 149:21 159:7 165:6 173:6 175:22, 23 176:12 191:14	discussing 138:5 182:14	early 135:16
Deponent 134:17	differently 149:17	discussion 194:24 195:14 200:7	easily 174:14
deposes 134:19	difficult 151:19	displayed 179:10, 14 180:2, 12	economic 158:8
deposition 200:19	disavowal 148:3, 12, 19 149:1	distinguish 164:24 165:7	education 198:22
depositions 200:3	disavows 149:6	distinguishing 137:23	effect 174:23 175:3, 12, 20 176:2 177:13, 18
described 181:13, 23	disclaim 150:3	doctor 134:14 168:6	either 170:10 171:7 173:21 199:23
describes 171:19	disclaimed 149:19	documents 170:23 177:2 182:13, 16, 18 183:15 186:13, 16, 22, 24 187:3 193:4, 7	electronic 139:5
describing 182:6	disclose 142:8	doing 134:5 155:3 200:3	elements 167:14
designed 164:17	disclosed 185:3	double 161:14, 21 162:6 166:24 185:11, 16 186:1, 6, 11 188:14 189:2 190:14, 18, 22 191:5 193:17 195:20	Ellison 143:16 146:12, 17
determine 158:7	discontinued 193:20	double-check 170:16	email 135:9
determining 141:9	discover 176:2 177:13	due 192:9	end 151:24
develop 181:16	discovered 177:19 179:1	duly 134:18	ended 135:5
developed 165:10, 23 168:2 180:6	discovery 175:19, 20 182:11, 18		engaged 135:11
developments 165:1, 8	discuss 138:1		entire 153:9 195:12
diagonal 166:19, 23	discussed 174:3 192:10, 22		entirely 148:22 169:9

ESCHWEILER 134:12 ethylene 141:21 evaluate 173:2, 7 177:11 evaluating 172:10, 14 evidence 136:24 137:18 153:5, 10, 20 154:4, 5 156:13 157:19 164:9 165:9 181:20, 24 196:7, 11 197:18 exact 155:17 176:19 exactly 136:3, 10 149:10 170:4 171:12 196:17 EXAMINATION 135:1 expectation 169:10 170:9 171:5, 6 expected 169:10, 16 172:7 174:9 experience 198:22, 24 199:8 expert 136:22	159:18 198:9, 16 199:2 expertise 198:20 199:6 explained 171:13 173:16 174:4 178:19 explaining 143:14 explanation 178:2, 18 F F-E-L-T 183:24 fabric 138:7 140:11, 12 146:20 183:11 184:18 fact 155:8 167:8 177:4 186:19 factor 141:19 144:1 facts 154:8, 13 161:7 fair 149:2 157:20 159:16 173:15 189:12, 13 fairly 146:1 familiar	176:20 179:5, 13, 23 family 156:1, 4, 17, 22 194:17 favor 165:13 186:7 feature 187:23 felt 183:24 184:3 field 199:2 file 149:6 find 135:9 148:24 149:18 156:24 174:12 finding 153:21 154:6 fine 149:16 152:20, 22 first 134:17 135:11 141:6 176:1, 7 190:7 five-minute 199:12 flow 143:19 fly 170:18 focus 159:10 follows	134:19 forget 138:23 form 137:10 150:9, 16 152:6 154:18 158:20 165:18 167:1 175:6 176:3, 13 177:7 178:6 181:7 192:19 194:13 195:22 198:3 199:4 formation 193:12 forming 153:10 191:8 forth 153:5 160:4 161:3 found 169:12 174:10 178:21 194:10 foundation 148:15 155:15 157:13 164:19 195:23 frame 180:17, 18 froze 168:6 frozen 168:6, 15
---	--	--	---

full 149:6	guys 146:3	167:20	independently 164:17
functional 181:14		179:2, 6, 10, 14, 24 180:2, 6, 12 184:18	165:10, 23
	H	189:15, 17	168:2
G	hang 145:12 146:3	191:11	indicated 166:7 186:24
gave 178:17	happen 176:11	193:20 194:6	indicates 165:12
general 160:18	happy 171:14	197:4, 8, 10	indication 160:17
generally 138:4 188:8	Harris 153:6	198:10, 11, 12, 13, 14	165:14, 16
196:14	188:16, 17, 20	199:3	indicia 150:7
getting 139:3 187:14	191:18	I	indiscernible 178:5
give 175:4	hear 146:2	identified 134:18	industry 197:5
goes 194:14	168:10, 12, 13, 17, 22	identifies 163:1	198:11, 14
going 134:2, 4, 22	178:12	identify 156:9 164:8	information 154:20
139:1, 2, 10	heard 148:21	implicit 174:24	191:19, 23
141:5 148:8	high 147:10	important 137:19	192:4
151:20	history 149:6	inch 143:22	infringement 158:3, 5
152:12, 18, 21	hold 142:16 168:2	includes 155:18	167:11
159:7 162:2	193:6	178:21, 22	inside 174:15, 19
178:11 184:4	hole 147:10	Including 153:12	175:4, 10, 16, 17, 21 176:8
185:4	holes 138:7 140:12	incorporation 196:1	177:1, 5
good 143:21	143:22 147:1	increased 187:16, 20	intentionally 149:19 150:3
145:14	hours 136:16, 17, 19	188:6	interested 158:13
great 196:20	huge 174:5	increasing 188:7	181:14
guess 136:18, 21	hunting 163:3 164:16	independent 164:24 165:7	introduced 193:21
142:10			introduction 195:20
149:23			197:10
160:8, 17			
172:16			
194:14 200:1			

invention 158:9 170:3 171:15, 21 174:5	157:7, 10 158:14, 18 159:11, 19 162:1 166:4 167:24 170:19 172:23 173:5 176:15 180:24 185:1 187:13 188:2 190:17, 21 191:1, 4 194:5	174:3	limited 176:24
inventors 147:22		lengthy 178:17	link 135:9 149:24
investigation 158:3		level 143:24 144:14	links 179:18
involved 197:7		lexicographer 149:23 150:2	list 136:23 137:4
issue 160:5		lexicographers 147:23	listed 161:23 162:12 163:7
	knowledge 141:7 193:19	license 155:2, 17 156:13 157:8, 11, 17, 18 158:19 159:12, 13, 19 194:19	little 165:6 168:15 178:14 188:4
J	L	licensed 197:2	long 152:8, 17 178:2 185:5
Jason 153:6 188:20	lack 148:15 155:15 157:12 164:18 195:22	licensees 157:23 158:2, 12 159:10, 12	long-felt 180:19, 22, 23 181:5, 6, 21 182:4, 6, 12, 19 183:4, 11
Jay 153:7 157:3	language 155:2	licenses 154:24 155:4, 6, 13, 23 156:10, 15 157:23 158:7 159:16	longer 135:24 136:4
K	large 194:7	licensing 153:21 154:2, 5, 10, 12, 13, 17, 21 155:7 159:22 160:5	look 143:21 147:7 150:18 162:8 163:2 170:13, 15 171:14 177:9 183:5 189:24 190:5 192:2, 13 193:14 199:13
KIMBERLY 134:17	law 153:24	light 173:11 178:22	looked 160:14 162:7, 22 163:4, 17 165:13 166:2 167:22 172:4, 11, 18
kind 136:18, 21 137:4 143:24 149:21, 24 158:10 178:13 194:6, 22	lawsuit 157:24 158:5	light-blocking 185:1	
know 135:15 136:13, 20 137:16, 22 138:18 142:4, 10 143:18 145:13 147:9 148:18 155:12, 22 156:3, 5	lawyers 135:7		
	led 154:21		
	legal 149:12 161:4, 7 195:5		
	length		

179:7 189:21 197:19 looking 138:19, 22, 23 140:8 162:2 163:22 182:22 190:3 193:6 lot 152:7, 10, 17 192:15 M made 155:13, 19 163:12 185:19, 21 192:12 make 137:3 170:17 184:21 197:23 manufacturers 164:16 margin 191:1, 4 market 154:22 188:8, 12 190:2, 11, 21 marketing 191:9 marketplace 187:14, 24 material 141:10 142:5, 14 143:6 144:3, 14 147:4 167:9, 11, 19	169:11 172:5 174:9 181:16 183:6 194:1 materials 137:4 181:21 182:17 matter 135:12 136:6 146:24 mean 141:18 142:19 148:17, 23 149:10, 20 150:4, 19 152:7, 22 154:15 159:15, 17 160:14, 18 163:2 164:10 165:19 172:12, 24 173:9 174:2, 4 182:23 184:19, 22 187:12, 20 188:2, 4 194:4, 22 195:16 meaning 143:7, 13 144:4 150:3 171:1, 13 means 148:19 meant 170:7 175:24 mentioned 143:20 167:21 193:10 mere	173:17 merits 158:8 mesh 143:7, 13 144:4, 9, 14 146:15, 18 147:5, 12, 24 148:4, 12 149:7, 23 164:17 166:7, 23 167:11 169:11 172:5 175:11 177:14 179:1 183:11 184:17, 24 194:1 195:21 196:1 methyI 141:21 microphone 178:14 middle 168:24 might've 136:4 mind 146:24 155:11 166:21 173:12 minor 196:4 mixed 184:21 Mm-hmm 135:20 mole 141:11	molecular 141:7 142:3, 7, 8, 11 moment 134:7 money 157:7 Months 136:2 months' 136:15 move 152:21 181:3 moved 178:13 mute 134:14, 22 N name 196:22 names 161:18, 22 162:8, 13, 17 163:6 197:3 necessarily 182:23 necessary 157:1 need 138:16 142:22 143:2 144:5 159:15 167:13 177:8 180:20, 22, 23 181:5, 6, 14, 16, 21 182:4, 6, 12, 19 183:4, 11
---	---	---	--

needs 200:9	150:9, 16 152:6 154:18 155:14	139:3, 6, 20 140:1, 7, 10, 15, 19, 23	197:2
never 157:17, 18	158:20 165:18	141:5, 20 142:17 143:4	one-way 167:8, 10, 19 174:23
nexus 194:21 195:1, 8, 13 197:19	167:1, 16 172:22 175:6 176:3, 13 177:7 178:6 181:7 192:19 194:13 195:22 198:3 199:4	145:10, 13, 15, 16, 19 146:7 149:16 150:6, 23 151:4, 20 152:3 153:14, 17 155:12, 22 156:20 157:7 158:6 159:9 161:12 163:12 165:15 168:16, 21 172:3 173:23 176:1 179:9, 23 182:16 184:2, 14 186:15 187:9 188:5, 13 189:1, 19 192:7, 15 197:7, 13, 21 199:11, 14, 15, 19, 20, 24 200:14, 15, 17	175:3, 11, 19 176:2 177:13, 17 179:1 181:21 184:17 187:7 193:24 195:21
non- obviousness 150:8, 15 151:1 153:21 154:6 157:19 186:8	objection 136:7 148:14 152:23 157:12 164:18 180:8		ones 161:24 167:21 182:22 184:24 193:14, 16
normal 149:8			open 138:15 146:20 147:1, 4, 13, 16
notes 199:13	objective 150:7		opened 140:9
number 142:11 144:17 147:19 187:17 188:21 196:20	observers 183:14		openness 143:17
numbers 159:24 188:13, 16 189:2, 7, 14, 21 190:4, 13, 19, 23 191:12	obtained 169:16		opinion 137:8 138:6 140:20 147:5, 22 148:2, 9 150:7, 14, 24 151:14, 15 152:5, 20 153:4, 20 154:16 155:7 160:12, 21 161:13 166:1, 23 167:10, 19 168:3 169:1, 4, 8, 15, 19 170:1, 20
numerically 147:15	obtaining 157:23		
o	obviously 153:15 160:18 165:12 167:7, 13 185:2	once 134:5 187:22	
Ob 148:14 165:18	occupant 183:12	one 146:3 159:4 167:14 168:20 179:15 180:10 185:19, 21 188:21 192:11, 12, 23 193:9 196:18, 22	
object 137:10	occur 172:7		
	offhand 190:9, 13, 20, 24 191:12		
	okay 134:1, 8, 21		

180:19 183:3 186:1, 5, 18 191:9 193:13 198:5, 17 opinions 137:1 152:14 153:11 170:18 ord 142:15 order 144:2 ordinary 143:7, 12 144:3 169:21, 23 170:2, 8, 21 171:1, 3, 20 172:6 178:20 outlined 158:11 161:19 outside 140:19 171:24 175:17 181:4 183:1, 14 192:17 193:24 194:18 Outtech 157:5 outwardly 183:13 overly 147:2 P p.m. 200:19	pages 152:4, 19 paid 157:8, 18 158:15 panels 173:10 185:1 paragraph 138:9, 20 140:8 142:13, 21 143:5 146:11 151:8 153:3 161:13 162:20 172:1, 8, 13, 17 173:15 174:7 177:24 185:10, 24 187:15 188:19 193:5 195:7, 11, 16 paragraphs 137:8, 9 151:16, 20, 22 152:15 159:21 161:1 169:5 195:2, 4 part 144:8 153:19 181:22 194:8, 23 partial 183:21 particular 141:7 144:17 155:7 166:9 181:16 parts 194:6	pass 140:12 patent 143:8, 13, 18 144:5, 10, 15 147:8, 12, 17, 23 148:5, 9, 13 149:1, 5, 18 151:2 153:16 155:9, 24 156:13 157:8, 17, 24 158:2 163:20 164:5 167:12 170:3 176:21, 23 180:14 185:13, 18 194:11, 12 patented 158:12 174:4, 5 187:22 patentee 149:18, 22 150:1 patents 146:22 155:22 156:3, 14, 16, 21, 23 194:16, 18 pattern 162:9 166:10, 11, 17 payments 155:13, 19 PDF 200:15 people 181:10	196:10 197:2, 17 198:7 person 169:20, 23 170:2, 7, 21 171:1, 3, 19 172:6 178:20 pertains 198:10 perusing 170:23 177:2 183:15 193:4, 7 photos 152:9 163:4, 5, 8 166:2, 5, 6 phrase 149:24 physical 163:3 164:10 picture 179:8 pictures 152:17 163:10 164:10 179:16 plain 142:15 143:7, 12 144:3 please 139:19 141:3, 13 143:3 150:6, 14 151:5 183:17, 18 200:12
--	---	---	---

point 173:8 192:24 194:23	192:9 195:19	profit 191:1, 4	154:11 155:14 158:24
poking 139:18	Primos 156:8 166:24	provide 137:7, 19 142:2 169:19 198:17	159:1, 3, 8, 16 165:6 168:24 173:6 175:8, 14 178:7, 10
polymer 141:8, 24 142:3, 7, 9	185:11, 15 186:1, 11 187:1 188:10, 14 189:2 190:7, 14 191:10 192:5 193:20	providing 169:14	181:15, 18 183:21 184:7 192:15, 16 199:5
pop-up 180:3, 7, 10, 14, 16, 17, 18	print 139:1, 3	publications 182:10	question's 165:5
possibility 168:1	printout 138:24 139:8, 12, 16	pull 138:11, 16 141:2	questions 142:20 199:21, 22
possible 164:21 165:4	prior 172:9, 14, 20 182:5, 11 190:17, 21 195:20	pursuant 155:13	quickly 199:14
potentially 164:21	probably 137:2 160:15, 17 171:5	put 134:2, 22 136:5 137:17, 24 162:17 163:21 183:8	quite 178:2
practice 137:19 155:9	product 153:16 156:9 157:11 161:22 163:6 165:17 185:16, 17 193:23	putting 194:23	R
precede 182:18	products 160:9 161:20 162:5, 8, 9, 11, 20 163:1, 2, 13, 18, 20 164:6, 10 166:5 192:10, 13, 21 197:20	Q	range 136:21
precise 147:18	professional 198:22	qualify 144:14, 18 145:7 147:4, 20	Ranson 153:7 196:12, 24 197:1, 4, 14 198:1
predated 191:5		question 137:17 138:17 141:5, 12, 16 142:6 144:22 145:3, 6, 8 146:5 147:14 148:7, 23 149:3, 4, 15 150:14, 17 152:13 153:18	ratio 143:21
preparing 136:22 137:6			reaching 183:3
presume 159:18			read 134:6 141:13, 16 143:17 144:24 145:3 146:5 150:19 151:6, 9, 10, 16, 17, 21
pretty 199:14			
previous 193:23			
pricing 191:23 192:4			
primary 196:2			
Primo			

152:16, 19, 24 159:15, 18 183:16, 17, 19, 21 184:7 reading 140:16, 19 reason 160:19 reasonable 169:9, 15 170:9 171:6 174:8 reasons 158:8 recall 138:2 178:24 179:3, 7, 9, 11, 13 180:9 182:20 190:9 196:3, 12, 15, 20 recalling 170:12 recess 140:4 185:7 199:17 Recognizing 166:4 recollection 156:16 174:16 180:15 record 134:2, 3 139:16, 17, 23 140:2 200:7 reference 172:9, 13 173:8 referenced	172:16 189:4 references 178:3, 18, 23 182:6 referred 160:7 172:18 187:15 189:22 191:16 referring 188:9 refers 177:4 regard 137:12 regarding 148:4 197:15 related 169:2 191:20 relates 150:7, 24 relative 135:21 173:2, 17 188:6 191:9, 10 relevant 141:8 relied 137:4 153:10 164:12 rely 192:8 196:8 relying 160:10 161:9 192:16 remem 156:6 remember	135:13, 17 136:3, 9 139:5 155:3, 5, 16 156:2, 7, 11 157:9, 14 158:16 161:18 162:7, 13 163:6, 9, 21 164:7, 14 166:8 167:7 170:4, 24 171:12 176:5, 9, 19 179:15, 18 187:10 188:15 189:20 190:3, 12, 19, 23 191:3, 7, 12, 21 193:22 196:17 remembering 197:3 remotely 134:5, 8 rendered 170:20 rep 151:12 repeat 141:12 144:22 175:7 178:13 report 137:3 150:11, 19 151:8, 10, 11 152:1, 4, 19, 24 169:5 REPORTER 134:1, 13, 21	139:22 140:1, 6 145:1, 5, 10, 15, 17, 20, 23 146:2, 9 168:5, 8, 11, 14, 19 178:9, 11 183:23 184:2, 4, 11, 14 185:9 189:16, 19 198:12 199:19, 24 200:4, 9, 14, 17 require 180:18 181:2 required 147:16 respect 149:7 153:16 response 168:7 176:14 result 174:10, 12, 17, 22 175:11 results 161:20 168:4 169:2, 12, 16, 20 171:18 178:16 retained 135:22 retardation 143:23 return 158:19 159:12 review 153:4 165:11 170:11 183:1
---	--	--	---

188:13 189:1, 14 190:1 191:13, 17, 23 198:17 reviewed 154:23 155:1 157:2 158:10 182:2 186:13, 16, 24 187:3 188:16, 20 189:7, 23 191:16 196:11 197:17 reviewing 186:21 right 137:5 138:10 140:17, 24 141:22 144:11, 19 145:18, 20 146:7 147:20 152:24 155:20, 21 157:3, 5 158:15 160:13, 22 161:4, 7, 10 164:4, 13 169:6, 17 170:13, 24 172:20 174:10 175:5, 12, 22 176:21 180:16 182:7 185:18, 22, 23 187:11 188:20 190:15 193:13	195:5, 8, 13, 15 196:17 197:8, 11, 22 rise 175:4 Robert 153:6 196:12 Rugged 135:6, 12 154:17, 24 157:8 158:18 167:20 191:19 194:11 S sale 197:8 sales 187:16, 21, 24 188:6, 9, 11, 13 189:2, 7, 14, 21 190:17 191:19 satisfactorily 134:18 saved 138:23 saying 163:16 170:6 171:3 183:23 says 141:21 146:19 162:22 177:18 Scholes 153:7 157:3 scope 136:8 148:3,	12 149:6, 19 150:4 167:2, 17 180:8 scrim 169:11 Seaton 153:6 161:10, 19, 23 162:5, 14 163:1, 7 169:9, 15 170:1, 20 171:18 176:1, 7 177:13, 18 178:24 180:6, 12 Seaton's 174:17, 21 179:9 182:11, 18 second 146:3 161:12 190:10 secondary 150:11, 15 151:1 152:5 153:3, 11 154:1 196:6 197:15, 24 198:9 199:2 section 150:10 195:17 see 143:8 146:12 154:19 161:15 162:9 165:9, 14, 15 175:15, 16, 17 183:6, 13, 14 184:20, 23	187:16, 19 see-through 167:9, 11, 19 174:23 175:3, 12, 20 176:2 177:13, 18 179:1 187:7 193:24 seeing 173:12 180:9 selling 193:23 sentence 161:12 170:7 171:2, 14 September 135:18 set 153:5 182:16 sets 160:4 161:3 setup 184:19 shape 163:10, 13 share 188:8 190:2, 21 shorter 152:11 show 179:11 shown 154:2 signing 135:21 similar 166:15, 17
---	---	---	---

167:7 173:9, 10 183:6 199:8 similarities 164:9 165:17 similarity 165:3 simply 146:19 sit 152:18 sitting 180:15 189:6 size 147:1, 3, 16 skill 169:21, 24 170:2, 8, 21 171:2, 4, 20 172:6 178:20 so-called 165:1, 8 sold 157:10 190:7 son 179:2, 6 spaces 146:20 147:1, 4, 13, 16 speak 135:6 speaks 137:11 specific 136:23 137:7, 8, 20 154:14 166:14, 16 176:5, 9	186:15 187:5 188:1, 15 190:4, 12 192:16 specifically 198:24 spellings 200:5 spend 139:17 191:9 spent 191:14 standard 149:12 154:3 161:4, 7 195:5 start 148:10 184:5 starting 151:8 185:24 state 138:9 142:13 143:5 146:14 150:6, 14 151:4 153:3 161:13 174:8 statements 160:13, 16 states 134:19 stipulate 134:4 stopped 193:22 strength 138:3, 5, 21 140:11, 16, 20, 22, 23 141:2, 6, 21 142:2, 8, 14	143:6 144:18 145:7 147:20 173:20, 24 174:2 177:20 structure 179:24 181:17 196:2 success 154:22 186:6, 17 187:12 192:8, 17 193:2 194:3, 10 successful 154:17 186:3, 12, 20 187:2, 23 suited 196:6 197:14, 24 sum 153:10 summarize 152:4, 20 superior 168:4 169:2 support 137:9 155:7 supportive 136:24 supports 153:21 154:5, 6 supposed 194:3 sure 135:16 145:11, 18 148:22 149:4	154:15 156:2, 7 159:14 172:12 175:13, 14 181:12 184:21 surround 193:17 Surroundview 156:8 161:15, 21 185:12, 16 186:2, 7, 11, 19 187:1 188:14 189:3, 8 190:7, 15 191:2, 5, 10, 20, 24 192:9, 18 193:3, 13, 18, 21 194:2 195:12, 19 swear 134:9 switch 142:17 sworn 134:18 T take 134:7 148:24 153:9 185:5 196:12 199:12, 13 taken 140:4 158:7 185:7 199:17 talk 154:9
--	---	--	--

talked 177:15 186:17 187:3, 6	testimony 136:17 137:9 140:10 143:10 146:21 159:22 160:11 171:9, 10 174:17, 22 175:5 179:3, 10 196:13	151:24 155:1 156:5 159:5 161:19 162:17 164:20 168:5, 20 170:6, 11, 14 171:11 176:16 177:16 178:17 180:4 183:5, 16 188:17 192:10 193:15 195:24 196:16, 17, 18, 21 197:1	147:13, 14 today 135:6 189:6 200:5
talking 138:2, 20 146:3 147:6, 8 154:10 166:5, 6 168:20	text 135:8 152:10		told 139:11
talks 143:18 150:11 188:17	Thank 135:4 146:7 199:21		tomorrow 200:1, 2
teaching 178:22	thereto 183:2	thinking 144:8	trade 179:11
technological 181:5, 15	thing 134:6 139:11 156:24 166:8, 21	third 198:4	transcript 200:11
technology 197:2 199:7, 8	things 137:24 143:19 147:9 152:10 154:2 160:7, 19 162:10 163:23 165:11 172:18 173:13 182:2 183:7 187:7 197:20 198:18	thought 136:24 137:18 139:2, 7 156:1 172:5 194:15	true 160:15 172:10 173:7 174:21 177:6, 10 195:18
tell 142:5, 23 143:2 147:3 151:14 180:5 189:6 190:6	think 137:2, 13 143:14, 15 144:16 145:13, 21 147:2, 18 148:21 149:22	thresholds 147:15	truthful 160:13, 20
term 146:15, 18 147:24 148:12, 21 149:7 150:3		time 136:5, 12, 14, 15 139:17 151:7 170:3, 12, 16 171:15, 20 176:11, 16, 17 185:5 193:21 198:4	try 188:3
terms 144:16 155:6, 17 193:12, 15		times 176:12	trying 150:20 151:7, 19 169:22
testified 140:15 171:11		tiny	two 136:15 178:2
testify 197:14, 24			type 167:8 181:16
			types 148:4
			typically 182:21
			U
			understand 146:17 148:6 149:4, 9, 15

154:11 158:23 159:1 188:4 197:21 198:23 understanding 153:24 158:1 161:3 175:14 181:18 199:7 undertake 136:23 137:7 165:7 171:17 unexpected 168:3 169:2, 20 171:19 174:13, 17, 22 177:12, 16, 19 178:4, 16, 21 184:16 unexpectedness 172:10, 15 173:2, 7, 24 unit 190:17 units 190:6 unmistakable 148:3, 11, 19 149:1 unpack 188:3 unrelated 158:8 unrestricted 181:1 v vendors 148:10 ventilation	143:19 147:8, 11 videos 179:17, 21 view 174:15, 18 175:4, 10, 21 176:7, 24 177:5, 19 193:17 viewing 181:21 vision 184:17 w wait 153:17 184:20 want 138:11 139:12, 17 144:24 145:5 150:19 151:6, 9, 10, 13, 18 152:15 159:10 170:5, 13, 15, 17, 18 171:16 199:13 200:10 wanted 137:24 145:12 181:11 waste 151:7 watch 179:20 water	140:11 way 150:22 weave 163:11, 13 166:10, 12, 17, 18 week's 136:14 Weeks 135:23 weigh 165:13 weighs 186:7 weight 141:8 142:3, 7, 8, 12 went 174:8 wh 193:8 Whybrew 173:3, 4, 5, 8, 9, 10, 13, 18, 24 174:2 177:20 184:20, 22 185:3 window 183:12 184:18, 24 witness 136:9 137:13 141:18 148:16 150:10, 18 152:7 154:19 155:16 157:14	158:22 164:20 165:19 168:7, 10, 13, 16, 21 170:23 172:23 175:7 176:4, 14 177:2, 8 180:9 181:8 183:15 184:9, 13 189:20 192:20 193:4, 7 194:14 195:24 198:5, 15 199:6, 15 Wol 134:13 Wolter 134:14, 15 136:7 137:10 144:21 145:8, 13, 16, 19 146:7 148:14 150:9, 16 152:6, 23 154:18 155:14 157:12 158:20 164:18 165:18 167:1, 16 168:9 172:22 175:6 176:3, 13 177:7 178:6 180:8 181:7 192:19 194:13 195:22 198:3 199:4, 22
---	---	--	--

200:2, 13	188:11, 23	
word	192:20	
173:18, 20	195:17	
words	year	
149:8, 12, 13	135:16	
worked	190:8, 10	
196:19	years	
worth	196:20 197:5	
136:14, 15	yesterday	
wrap	135:5 140:15	
199:14	Youtube	
write	179:17, 20	
163:14	yup	
164:4, 5	141:4 146:9	
173:14, 18, 20	168:8 192:2	
writing		
170:6		
written		
171:24		
177:23		
wrote		
170:24		
Y		
yarn		
162:9		
166:19, 23		
yeah		
136:18		
137:13		
138:18		
139:6, 15		
140:9 141:1,		
18 142:19		
152:1 160:6,		
8 164:11		
168:9, 14		
174:24 175:9		
176:16 178:8		
184:22 187:6		