

JUNE ANN MUNFORD
UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

- - -
DISH NETWORK, LLC, : CASE:
: IPR2024-000373
PETITIONER, :
: U.S. PATENT NO.
vs. : 7,594,249
:
ENTROPIC COMMUNICATIONS, : CASE:
INC., : IPR2024-000393
:
PATENT OWNER. : U.S. PATENT NO.
: 7,295,518
:
:

- - -
REMOTE DEPOSITION OF
JUNE ANN MUNFORD
- - -

Taken remotely, via Zoom, on
Thursday, February 20th, 2025, beginning at
12:00 p.m. EST, before Beau Dillard, RPR, a
Notary Public in and for the Commonwealth of
Pennsylvania.

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ENTROPIC EXHIBIT 2020

DISH v. Entropic

IPR2024-00373

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JUNE ANN MUNFORD

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Representing the Patent Owner

ENTROPIC COMMUNICATIONS, INC.,

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JUNE ANN MUNFORD
DEPOSITION SUPPORT INDEX

DIRECTION TO WITNESS NOT TO ANSWER
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None

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None

STIPULATIONS
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5 1

QUESTIONS MARKED
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None

JUNE ANN MUNFORD

- - -

The attorneys participating in this deposition acknowledge that the court stenographer is not physically present in the deposition room and that he will be reporting this deposition remotely.

They further acknowledge that, in lieu of an oath administered in person, the oath will be administered remotely. The parties and their counsel consent to this arrangement and waive any objections to this manner of reporting.

The attorneys have indicated their agreement to the above stipulation off the stenographic record.

It is stipulated and agreed to by and between counsel for the respective parties that all objections, except as to form of the question, are reserved to the time of trial.

- - -

1 JUNE ANN MUNFORD

2 - - -

3 JUNE ANN MUNFORD, after having
4 been first duly sworn, was examined and
5 testified as follows:

6 - - -

7 EXAMINATION

8 - - -

9 BY MR. HALVERSON:

10 Q. Welcome back, Ms. Munford.
11 Can you state your name for the
12 record, again?

13 A. Sure.
14 My name is June Ann Munford.

15 Q. And I'll dispense with a lot of
16 the same precursor instructions, as we've done
17 this before, but if at any time you need a
18 break, feel free to ask. I just ask that if
19 there's an outstanding question, you answer
20 that question before we go on break.

21 Is that fair?

22 A. That's fair.

23 Q. Please try to give oral answers
24 so that the court reporter can take down what
25 it is that's being said.

1 JUNE ANN MUNFORD

2 Nods are hard and uh-huhs and
3 uh-uhs are very hard, but yeses, noes, and
4 spoken sentences make for a clean record.

5 If you could strive to do that,
6 that would be fantastic.

7 Is that all right?

8 A. That's good with me.

9 Q. And then my standard Zoom one,
10 because we are on a remote platform, it's
11 important that we pause and let the other
12 person finish speaking.

13 I will do my best to wait for
14 you to finish answering. If you could do your
15 best to wait for me to finish asking my
16 questions before you jump in.

17 Is that fair?

18 A. That's fair.

19 Q. And then from time to time your
20 counsel may object. Unless you're instructed
21 to not answer the question, you are supposed to
22 still give an answer.

23 Is that fair?

24 A. That's fair.

25 Q. And do you have access to the

1 JUNE ANN MUNFORD

2 Exhibit Share program this morning?

3 A. I do not.

4 Q. Do you have your declaration
5 available to you from ICR202400373?

6 A. Not readily accessible.

7 Q. All right.

8 MR. HALVERSON: Let's go off the
9 record for a second.

10 - - -

11 (Whereupon, a recess took place
12 from 12:03 p.m. to 12:04 p.m.)

13 - - -

14 (Whereupon the document was
15 marked, for identification purposes, as
16 Exhibit Number 1031.)

17 - - -

18 BY MR. HALVERSON:

19 Q. Ms. Munford, you have in front
20 of you Dish 1031.

21 Is that right?

22 A. That's correct.

23 Q. And what do you see at the very
24 top of that document -- of the first page of
25 that document?

1 JUNE ANN MUNFORD

2 A. The title, Declaration of
3 June Ann Munford January 31st, 2025.

4 Q. Can you go to the seventh page
5 for me real quick?

6 A. Okay.

7 Q. Is that your signature on the
8 bottom of the seventh page?

9 A. It is.

10 Q. And did you apply that signature
11 on roughly January 31st, 2025?

12 A. I did.

13 Q. Do you stand by everything in
14 this declaration?

15 A. I do.

16 Q. Are there any corrections or
17 changes that we should make to it?

18 A. Not that I'm aware of.

19 Q. All right.

20 So if you could flip to the
21 second page for me?

22 A. I'm there.

23 Q. In Paragraph 6, you made a
24 statement, Reasonably diligent, interested
25 POSITAs would be able to interact with

1 JUNE ANN MUNFORD

2 resources, and the sentence goes.

3 Do you see that sentence?

4 A. I do.

5 Q. What is a POSITA?

6 A. POSITA is a phrase commonly used
7 in this type of work that stands for Person of
8 Ordinary Skill in the Art.

9 I can't give a formal legal
10 definition of this term, but I understand it to
11 mean someone with the requisite background or
12 education in a given subject.

13 Q. And do you know what the given
14 subject in this proceeding is?

15 A. Not without speculating.

16 Q. Do you know the educational
17 level attained by a POSITA in this proceeding?

18 A. I do not.

19 Q. Do you know what kind of work
20 experience a POSITA in this proceeding would
21 have had?

22 A. I do not, without speculating.

23 Q. And so when you're offering
24 opinions in this paragraph about what a POSITA
25 would have been able to do, how did you come to

1 JUNE ANN MUNFORD

2 that conclusion?

3 MR. AMER: Objection. Form.

4 THE WITNESS: Discussing
5 accessibility in this document in light
6 of whether or not POSITAs would be able
7 to access the materials within.

8 I made that determination based
9 on my belief that any member of the
10 general public would be able to access
11 these materials, and as such, a POSITA
12 would be included within that group,
13 regardless of the education or work
14 experience.

15 BY MR. HALVERSON:

16 Q. So your opinions are not limited
17 to POSITAs as much as POSITAs are part of the
18 subset of people that you contend would have
19 been able to do the things that you outlined in
20 Paragraph 6?

21 MR. AMER: Objection. Form.

22 THE WITNESS: Correct. Correct.

23 BY MR. HALVERSON:

24 Q. Have you ever worked at the
25 Linda Hall Library?

1 JUNE ANN MUNFORD

2 A. I have not.

3 Q. Have you ever -- and please
4 forgive me, we talked about this last time and
5 I forgot some of the specifics of it, but have
6 you ever worked at a college library?

7 A. I have not.

8 Q. Have you ever worked at a
9 research library?

10 A. I have not.

11 Q. What kind of libraries have you
12 worked at?

13 A. Public libraries.

14 Q. Like the library of a
15 municipality or a town or some sort?

16 A. Correct.

17 Q. And which public libraries have
18 you worked at?

19 A. I've worked at the Hart Public
20 Library in Hart, Michigan. The
21 Anchorage Public Library in Anchorage, Alaska,
22 and the Dowagiac Public Library in Dowagiac,
23 Michigan.

24 Q. And did you work physically on
25 location in those three libraries?

1 JUNE ANN MUNFORD

2 A. I did.

3 Q. How long did you work at the
4 Anchorage Library?

5 A. I worked at the Anchorage
6 Library for two years and a few months after.

7 Q. At approximately what point in
8 time?

9 A. The approximate points in time
10 would have been late 2010 to early 2011, late
11 2012. As my-- the time leaving the library
12 happened very close to the new year, I wouldn't
13 be able to give you a clear answer without
14 reviewing the CV.

15 Q. That's okay.

16 In your time working in
17 municipal public libraries, did any
18 technically-inclined individuals ask you for
19 help finding documents?

20 MR. AMER: Objection. Vague.

21 THE WITNESS: Could you help me
22 what you mean when you say,
23 technically-inclined individual?

24 BY MR. HALVERSON:

25 Q. Yeah.

1 JUNE ANN MUNFORD

2 I'm trying to capture -- so we
3 had said that the -- your opinions about
4 POSITAs were not limited to POSITAs, and so I
5 was trying to expand to try to capture the
6 scope of what would be covered by that.

7 I can ask again, limited to
8 POSITAs, but we had, I thought, established
9 that in this particular context, it wasn't
10 specific to this proceeding. I was trying to
11 capture a slightly broader avenue.

12 Is there a way that you would
13 like me to phrase that so that it can be more
14 clear?

15 A. No. I think I understand what
16 you're saying as an individual with some level
17 of -- of technical skill or knowledge.

18 Q. Yes.

19 A. I would regularly assist library
20 patrons with backgrounds in a particular skill
21 or with particular technical knowledge.

22 Q. And how do you know?

23 MR. AMER: Objection. Vague.

24 THE WITNESS: Generally
25 speaking, assisting a member of the

1 JUNE ANN MUNFORD

2 public with that type of request comes
3 with a need to seek the materials that
4 they're looking for.

5 There's also the common
6 experience in libraries of working with
7 the same patron over and over again.
8 Thus, you develop a rapport with them and
9 understand their needs and their
10 background more than you would the
11 average person to walk in a library.

12 BY MR. HALVERSON:

13 Q. And so are you thinking of a
14 specific individual that you recall working
15 with, as far as identifying and sourcing
16 certain publications or documents?

17 A. I'm thinking of a handful of
18 different individuals that had requests on --
19 along similar lines.

20 Q. And can you give me an
21 example -- I don't need to know the name, but
22 perhaps the background of one of those
23 individuals and what they were looking for?

24 A. Sure.

25 One example would be a college

1 JUNE ANN MUNFORD

2 professor that taught both literature and
3 anthropology and was requesting materials to be
4 reviewed for their upcoming syllabus.

5 Q. And so were they looking for
6 books for their class? Or when you say
7 materials, what kinds of materials, I guess --
8 let me start over. That was a poorly worded
9 question.

10 What kind of materials were you
11 referring to in that answer?

12 A. I believe in this instance, it
13 would have been a textbook, conference
14 proceeding or a journal.

15 Q. If you flip the page to Page 3,
16 I'm going to ask a couple questions about
17 Paragraph 8. Let me know when you're there.

18 A. I am there.

19 Q. The bottom of Paragraph 8 says,
20 Thus, although a library user may not know how
21 to create or maintain a MARC record, M-A-R-C,
22 they still use the MARC record when they search
23 a library catalog.

24 Do you see that?

25 A. I do.

1 JUNE ANN MUNFORD

2 Q. Have you ever seen a library
3 user use a MARC record to search a catalog?

4 A. So, as noted in previous
5 sentences in this paragraph, MARC records are
6 created to -- for usage in the library catalog,
7 as in, the MARC record exists as a way for the
8 library catalog to be able to search for
9 particular topics or fields.

10 And so, although an average
11 member of the public may interact with MARC
12 records via those search processes, those
13 members of the public would not be using MARC
14 records directly or reviewing MARC records
15 directly.

16 Q. I see.

17 So the -- the sentence -- what
18 you're trying to convey in Paragraph 8 is,
19 while the catalog search results may be
20 returned using fields from the MARC record, the
21 user who is using the catalog search engine
22 isn't necessarily using the MARC record
23 intentionally as much as on the back end of the
24 search process?

25 A. I believe that describing it as

1 JUNE ANN MUNFORD

2 happening on the back end is an accurate
3 description of the process.

4 So, for instance, a library
5 patron who is interested in the particular
6 material and requested it through the library
7 catalog may be able to search, find, request,
8 and circulate that material without ever
9 reviewing a MARC record itself.

10 Q. Understood.

11 Can you go to Paragraph 11 for
12 me? The next page?

13 A. I am there.

14 Q. There's a reference to something
15 you found on IEEE Xplore, is that right?

16 A. Correct.

17 Q. What is IEEE Xplore?

18 A. IEEE Xplore is an online
19 database of materials published and/or indexed
20 by the IEEE that serves as a way for library
21 patrons, as well as general members of the
22 public, to access and purchase these materials.

23 Q. Do you know when IEEE Xplore
24 launched its website?

25 A. I wouldn't know without

1 JUNE ANN MUNFORD

2 speculating, but I believe it was in the early
3 2000s.

4 Q. Do you know whether or not the
5 Armada reference that you're referring to in
6 Paragraph 11 was available in IEEE Xplore in
7 the early 2000s?

8 MR. AMER: Objection. Form.

9 THE WITNESS: I only know that,
10 within the IEEE page for this result, it
11 has a field for added to IEEE Xplore, and
12 thus, can infer that it was added to this
13 service on that date.

14 BY MR. HALVERSON:

15 Q. If you can go to -- I think it's
16 PDF Page 9, for me, please, real quick?

17 A. Yes. I'm there.

18 Q. And this is the IEEE Xplore web
19 printout that you printed out on
20 January 7th, 2025.

21 Is that right?

22 A. That's correct.

23 Q. For the Armada reference that we
24 were just talking about?

25 A. Correct.

1 JUNE ANN MUNFORD

2 Q. And do you see on here when the
3 Armada reference was added to IEEE Xplore?

4 A. That field does not appear to be
5 present on this screen capture.

6 Q. And this -- just for the
7 interest of full disclosure, this is a
8 multi-page screen capture of the IEEE Xplorer
9 page for this.

10 Is it somewhere else in the
11 page?

12 A. I don't see it anywhere.
13 It's possible that the field got
14 cut off in the process of capturing the page.

15 Q. And if you go to Page 31 for me,
16 please?

17 A. Okay. I'm there.

18 Q. And this is the IEEE Xplore
19 printout for the second Jacobsen paper.

20 Is that right?

21 A. That's correct.

22 Q. And do you see on here when the
23 second Jacobsen paper was added to IEEE Xplore?

24 A. I can see on Page 30 of this
25 declaration, a field that says date added to

1 JUNE ANN MUNFORD

2 IEEE Xplore, August 6th, 2002.

3 Q. And do you have any idea how
4 that data was entered or created?

5 MR. AMER: Objection. Form.

6 THE WITNESS: I have no personal
7 knowledge of how that was created.

8 BY MR. HALVERSON:

9 Q. Let's go back to -- go to
10 Paragraph 14 for me, please, back on Page 5?

11 A. I'm there.

12 Q. Talking back about MARC records
13 again.

14 Do you see that?

15 A. I do.

16 Q. And just to be fair, -- last
17 time we talked about MARC records, so we won't
18 rehash all of that, but is there anything
19 specific about the 008 field as compared to --
20 sorry. Let me start over.

21 Is there anything specific about
22 the data input process associated with the 008
23 field versus any other field in the MARC
24 record?

25 A. When you describe the data input

1 JUNE ANN MUNFORD

2 process, are you referring to the process of
3 creating the record?

4 Q. The process -- sure. The
5 process of creating the record. So the process
6 of -- let me start over.

7 My understanding is the way that
8 this goes is, a user moves their curser through
9 the field that they want to put the data into
10 for that given field.

11 And so when you're entering a
12 date, for example, into the 008 field, you go
13 click on it and then type in the date. When
14 you're entering something into, for example,
15 the 005 field, you go click on it and enter
16 whatever data goes into that.

17 So is there anything specific
18 about the 008 field that sets it apart from any
19 of the other fields?

20 A. I don't believe that your
21 description of the process is incorrect.
22 Although, in my experience, these records are
23 typically created using cataloging software
24 that may aid in the process of filling some of
25 those fields out.

1 JUNE ANN MUNFORD

2 So, for instance, in my
3 experience, when creating a new record within
4 the cataloging software, sometimes fields such
5 as header fields, 008 field as an example,
6 those fields are autopopulated by the software
7 based on pre-configured settings within the
8 cataloging software.

9 Q. Can you scroll down a little
10 bit? Paragraph 15 spans two pages. It starts
11 on Page 5 and goes to Page 6.

12 A. I'm there.

13 Q. You were talking about how --
14 I'm sorry. Go ahead. I didn't mean to --

15 A. That's okay. I'm just
16 confirming that I was there.

17 Q. We were talking about how MARC
18 records function for periodicals versus
19 single-instance publications.

20 Is that fair?

21 A. That's correct.

22 Q. And a periodical is something
23 that has subsequent additions or later
24 iterations of a publication with different
25 content, but perhaps linked together in some

1 JUNE ANN MUNFORD

2 sort of subject matter-based way, right?

3 A. I think that the typical
4 definition of periodical, as I understand it,
5 is a publication that releases volumes in
6 chronological concession rather than all at
7 once.

8 And the record is written to
9 describe the publication as a whole rather than
10 any one individual issue of that periodical.

11 Q. So like National Geographic
12 magazine would be a periodical, right?

13 A. Correct.

14 Q. And it's been published for
15 decades?

16 A. Yes.

17 Q. And so there would be one MARC
18 record for the National Geographic magazine.
19 Is that right?

20 A. Typically, yes.

21 Q. And the data creation of that
22 MARC record would be the first time that the
23 creating library received a volume of the
24 National Geographic magazine, right?

25 A. That is a possibility.

1 JUNE ANN MUNFORD

2 It is also a possibility that
3 the record gets created prior to formal
4 publication and perhaps at the onset of a
5 subscription to the periodical in question.

6 Q. And so assuming that a library
7 has been receiving the National Geographic for
8 ten years, when the March 2025 volume of the
9 National Geographic magazine comes in, it would
10 not get a new version of -- or a new MARC
11 record for that March 2025 edition, right?

12 A. Correct. Unless there was
13 something unusual or remarkable about that
14 specific issue.

15 Q. And so the MARC record date for
16 the National Geographic magazine would have
17 been ten years past 20 -- excuse me, 2015 for
18 that March 2025 volume for that library, right?

19 A. Correct.

20 New issues of a periodical are
21 appended to the previously existing MARC record
22 for the sake of expediency.

23 Q. And so looking at that MARC
24 record for the National Geographic magazine,
25 there's no way to identify when the March 2025

1 JUNE ANN MUNFORD

2 edition of the National Geographic magazine was
3 received by that library.

4 Is that right?

5 A. The MARC record does not tell us
6 explicitly when a given issue of the periodical
7 is made available.

8 Q. And you said you've created MARC
9 records for different works before, right?

10 A. Correct.

11 Q. As part of your role as -- at
12 one of the libraries that you were working at?

13 A. Correct.

14 Q. What kind of work have you
15 created a MARC record for?

16 MR. AMER: Objection. Vague.

17 THE WITNESS: I've created
18 records for periodicals, as well as
19 monographs and mixed media as well.

20 BY MR. HALVERSON:

21 Q. What is a monograph?

22 A. A monograph is a single-issue
23 publication or single-instance publication. A
24 good example would be a novel or a textbook.

25 Q. How do MARC records for theories

1 JUNE ANN MUNFORD

2 of novels or, like, -- Goosebumps or something?

3 A. Typically speaking, you would
4 create a MARC record for each new monographic
5 publication in the series and note that it is
6 part of the series within the MARC record.

7 This is different than the
8 approach that you would take for a periodical.

9 Q. And we've been talking today --
10 if you go back to Page 1 for me.

11 We've been talking today about a
12 declaration you submitted in IPR2024-00373 as
13 it relates to U.S. Patent Number 7,594,249.

14 Is that right?

15 Do you see that in Paragraph 2?

16 A. I see that this document I'm
17 reviewing is for the -00373 proceeding.

18 Is it possible I'm looking at a
19 different document?

20 Q. No. You're right.

21 I just read a lot of numbers.

22 That's on me.

23 A. That's okay.

24 Q. Without first pointing you to
25 paragraph.

1 JUNE ANN MUNFORD

2 So for clarity, the proceeding
3 and the passage number that this relates to is
4 in Paragraph 2 of this declaration, right?

5 A. Correct.

6 Q. But the discussion about MARC
7 records and POSITAs that we've had today is not
8 unique to this specific declaration.

9 Is that right?

10 A. That's correct.

11 Q. And the reason I ask is, you
12 submitted another declaration recently in
13 another proceeding.

14 Is that fair?

15 A. That is fair.

16 Q. And the opinions apply equally
17 to your opinions in the other proceeding?

18 A. Correct.

19 MR. HALVERSON: With that,
20 pending anything from your attorneys, I
21 don't have anything else.

22 Thank you, Ms. Munford.

23 THE WITNESS: Thank you.

24 MR. AMER: Can we go off the
25 record for a minute?

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JUNE ANN MUNFORD

MR. HALVERSON: Sure.

- - -

(Whereupon, a recess took place
from 12:32 p.m. to 12:37 p.m.)

- - -

MR. AMER: So nothing from us.
We'll call it a day.

MR. HALVERSON: I would love a
rough, Beau. And a five-day. Final.

MR. AMER: Same. Yes. Please.

- - -

(JUNE ANN MUNFORD was excused.)

- - -

(Deposition concluded at
12:37 p.m. EST.)

JUNE ANN MUNFORD
C E R T I F I C A T E

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF PHILADELPHIA:

I, Beau Dillard, RPR, a Notary Public within and for the County and State aforesaid, do hereby certify that the foregoing deposition of JUNE ANN MUNFORD was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand and official seal this 27th day of February, 2025.



Beau Dillard, RPR
Notary Public

Veritext Legal Solutions
1100 Superior Ave
Suite 1820
Cleveland, Ohio 44114
Phone: 216-523-1313

February 28, 2025

June Ann Munford
munford.research@gmail.com
Case Name: Dish Network, LLC v. Entropic Communications, Inc.
Veritext Reference Number: 7181789 Deposition Date: 2/20/2025

Dear Sir/Madam:

Enclosed you will find a transcript of your deposition.
As the reading and signing have not been expressly
waived, please review the transcript and note any
changes or corrections on the errata sheet
included, indicating the page, line number, change and
reason for the change. Sign at the bottom of the sheet
in the presence of a notary and forward the errata sheet
back to us at the address shown above or email to
production-midwest@veritext.com.

If the errata is not returned within thirty days of your receipt of
this letter, the reading and signing will be deemed waived.

Sincerely,
Production Department

NO NOTARY REQUIRED IN CA

DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 7181789

CASE NAME: Dish Network, LLC v. Entropic Communications, Inc.

DATE OF DEPOSITION: 2/20/2025

WITNESS' NAME: June Ann Munford

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me.

I have made no changes to the testimony as transcribed by the court reporter.

Date June Ann Munford

Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:

They have read the transcript;

They signed the foregoing Sworn Statement; and

Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal

this _____ day of _____, 20____.

Notary Public

Commission Expiration Date

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DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 7181789
CASE NAME: Dish Network, LLC v. Entropic Communications, Inc.
DATE OF DEPOSITION: 2/20/2025
WITNESS' NAME: June Ann Munford

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me.

I have listed my changes on the attached Errata Sheet, listing page and line numbers as well as the reason(s) for the change(s).

I request that these changes be entered as part of the record of my testimony.

I have executed the Errata Sheet, as well as this Certificate, and request and authorize that both be appended to the transcript of my testimony and be incorporated therein.

Date June Ann Munford

Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:

They have read the transcript;
They have listed all of their corrections in the appended Errata Sheet;
They signed the foregoing Sworn Statement; and
Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal this _____ day of _____, 20____.

Notary Public

Commission Expiration Date

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ERRATA SHEET
VERITEXT LEGAL SOLUTIONS MIDWEST
ASSIGNMENT NO: 7181789

PAGE/LINE(S) / CHANGE /REASON

Date June Ann Munford
SUBSCRIBED AND SWORN TO BEFORE ME THIS _____
DAY OF _____, 20_____ .

Notary Public

Commission Expiration Date

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.