1 UNITED STATES INTERNATIONAL TRADE COMMISSION

2 WASHINGTON, D.C.

3 ----------x

4 In the Matter of :

5 CERTAIN DERMATOLOGICAL : Investigation No.

6 TREATMENT DEVICES AND : 337-TA-1356

7 COMPONENTS THEREOF :

8 ----------x

9

10 [redacted]

11 [redacted]

12

13 VOLUME 2

14 Videotaped Deposition of

15 JEAN WOLOSZKO, M.D., Ph.D.

16 Austin, Texas

17 Friday, September 15, 2023

18 8:05 a.m.

19

20 Job No. 505915

21 Pages: 329 - 601

22 Reported by: Susan S. Klinger, RMR-CRR, CSR

Serendia, LLC
Exhibit 2148
Jeisys v. Serendia
IPR2024-00384
Ex. 2148-001

1 FDA as a patient contact thing, so it has to be 10:51:38
2 made of biomaterial product -- or biocompatible 10:51:41
3 product, sorry, biomedical product. 10:51:49
4 Q Just to make sure I understand, is it your 10:51:52
5 view that the LED in Mehta would be either part of 10:51:56
6 Item 216 or close to it to illuminate that area? 10:52:06
7 A I don't believe 216 is the LED, but I 10:52:13
8 would -- I would -- I would -- I would expect the 10:52:17
9 LED to be in this area. 10:52:20
10 MR. SANDERS: Thank you. We can take a 10:52:23
11 break. 10:52:24
12 THE WITNESS: Thank you. 10:52:24
13 VIDEOGRAPHER: Please stand by. We are 10:52:24
14 going off the record. The time is 10:52. 10:52:27
15 (Recess 10:52 a.m. to 11:06 a.m.) 10:52:29
16 VIDEOGRAPHER: We are now back on the 11:06:10
17 record. The time is 11:06. 11:06:35
18 Q Dr. Woloszko, I just want to follow up on 11:06:37
19 what we were discussing before the break to make 11:06:43
20 sure that your testimony is well reflected in the 11:06:45
21 written transcript. 11:06:47
22 A Sure. 11:06:47

1 Q We were talking about the LED in Mehta? 11:06:47
2 A Yes. 11:06:50
3 Q And before the break, I had asked about 11:06:50
4 where you would expect the LED to be. And in part 11:06:57
5 of your answer, you referred to this area and were 11:07:05
6 making a motion which wasn't captured on the 11:07:07
7 transcript -- 11:07:13
8 A Yes. 11:07:13
9 Q -- so I just want to ask it again, if you 11:07:14
10 wouldn't mind just explaining in words. 11:07:16
11 Where would you expect Mehta's LED to be 11:07:20
12 located? 11:07:25
13 A That would be located is what I call the 11:07:26
14 distal part, so proximal -- following Mehta's 11:07:29
15 nomenclature -- part of the -- of the handle. 11:07:33
16 So at proximity to this part number, what 11:07:36
17 was it again, 216, I think... Two -- yeah, close 11:07:40
18 to 216, but not 216, 216 being a window, so it 11:07:46
19 would be approximated to 216. 11:07:51
20 Q Thank you. 11:07:53
21 A Oh, can I make a -- just browsing through 11:08:19
22 it. I mentioned -- I saw two things, if I can add 11:08:20

1 something to my previous testimony. 11:08:24
2 You asked me, there was -- just so it 11:08:26
3 is -- just the -- the coupling system, remember 11:08:29
4 you asked me what was the male coupling system on 11:08:33
5 the distal part that would engage with the -- with 11:08:36
6 the -- with the feature on the needle cartridge so 11:08:42
7 it was the -- you asked me what is the product 11:08:48
8 engaged with the part 118. 11:08:50
9 And I just saw that, just wanted to share 11:08:55
10 that on the Column 18, he mentioned that in Figure 11:08:59
11 5 there was engagement portion 252 on the shaft 11:09:03
12 that coupled to the assembly. 11:09:14
13 So it is -- it is very schematic, it is -- 11:09:17
14 it is a schematic, so 252 is the engagement 11:09:21
15 portion that engages the male portion that engages 11:09:24
16 with the female portion in the needle cartridge. 11:09:29
17 Q So let me ask some questions so we have 11:09:36
18 this in Q and A format on the transcript. 11:09:38
19 A Yeah. 11:09:39
20 Q So in Figure 5, Item 252 is the part that 11:09:40
21 couples to 118 that was shown in Figure 4C; is 11:09:51
22 that correct? 11:09:58

1 connector, there is a deflectable contact. This 11:41:34
2 is not the analogy I'm using for the prior art 11:41:37
3 here. 11:41:39
4 Q So according to the understanding of 11:41:39
5 deflectable electrical contact that you apply in 11:41:45
6 assessing whether the references met the claims of 11:41:50
7 the asserted patents, does Na '848 disclose the 11:41:54
8 deflectable electrical contacts? 11:41:58
9 A I -- I -- he mentions the connector, and 11:42:01
10 the connector, again, is a deflectable contact. 11:42:03
11 So I cannot -- I did not use other things, but it 11:42:06
12 is -- includes presence of deflectable contacts, 11:42:10
13 as we have in the electrical connector. 11:42:13
14 Q So according to your understanding of 11:42:15
15 deflectable electrical contacts, as used in the 11:42:20
16 asserted patents, it would include virtually every 11:42:23
17 electrical contact because there is some nature of 11:42:29
18 deflectability to them; is that right? 11:42:35
19 A I think there are deflectable contacts 11:42:37
20 mentioned in several locations in the various 11:42:41
21 planes, some refer to the plane or the location of 11:42:44
22 action, and some say spring-loaded. Those that 11:42:45

1 describe, obviously, the pin that extends, those 11:42:48
2 will not include that. But the notion of 11:42:53
3 deflectable contacts, I would say yes, any 11:42:54
4 connector -- almost any connector -- I'm sure 11:42:58
5 there was other ways, so almost any connector has 11:43:01
6 a deflectable contact, yes. 11:43:04
7 Q In Na '848, is there a needle assembly 11:43:06
8 that is mechanically separatable from a proximal 11:43:27
9 end? 11:43:33
10 A Yes, the proximal end in this case is -- 11:43:34
11 oh, so the proximal end -- I think I read proximal 11:43:37
12 end as a cable, because I'm always confused, 11:43:43
13 distal and proximal end. So proximal end is still 11:43:46
14 proximal to the patient? 11:43:50
15 Q I'm referring to the proximal end as it is 11:43:52
16 used in the claims of the asserted patents. 11:43:54
17 A Okay. So repeat it again, is the needle 11:43:56
18 assembly... 11:44:00
19 Q Yeah. In Na '848, is there a needle 11:44:00
20 assembly that is mechanically separatable from a 11:44:03
21 proximal end? 11:44:06
22 A And I realize now that when I use 11:44:07

1 "proximal" in my report -- I use proximal because 11:44:28
2 I was confused always, I use proximal in the 11:44:30
3 common sense of proximal, so meaning the cable. 11:44:34
4 But in this case, in the Na -- in the Na 11:44:37
5 definition, there is no -- there is nothing more 11:44:40
6 proximal than the needle, so the answer would be 11:44:46
7 no. 11:44:49
8 Q Another reference for you. 11:44:49
9 (Exhibit 20 marked.) 11:45:14
10 Q You have been provided with what has been 11:45:15
11 marked as -- I will give you a second. You have 11:45:21
12 two copies there -- 11:45:23
13 A Oh, sorry, sorry, sorry, yes. 11:45:24
14 Q -- one is for your counsel. 11:45:25
15 A I'm getting tired. 11:45:27
16 Q You have been provided what has been 11:45:29
17 marked as Exhibit 20. It's IIooda 11668 through 11:45:31
18 11676. 11:45:37
19 Have you seen this before? 11:45:46
20 A Yeah, I didn't analyze it in detail, but I 11:45:46
21 have seen it, yes. Not something -- I spent a lot 11:45:51
22 of time on that, so I have seen it, yes. 11:45:54

1 Q And did you see this before you finalized 11:45:56
2 your opening expert report? 11:46:10
3 A I don't remember when I read it, so I 11:46:13
4 cannot answer yes or no, sorry. 11:46:15
5 Q This is what you refer to in your report 11:46:24
6 as the Kang 35 -- three -- let me say that again. 11:46:27
7 A Oh, this is the Kang patent? 11:46:30
8 Q This is -- this is what you refer to -- 11:46:32
9 A Oh, yes, sorry, sorry, sorry, I was -- 11:46:33
10 okay, yes, you know, of course I -- sorry, sorry. 11:46:35
11 Different format. Yeah, this is the Kang patent, 11:46:38
12 okay, yes. Because I saw Jeisys Medical there, so 11:46:42
13 is something else but this is the Kang, yes. 11:46:46
14 Q Exhibit 20 is what you referred to -- 11:46:48
15 A Yes. 11:46:50
16 Q Let me just finish the question 11:46:51
17 Dr. Woloszko. 11:46:52
18 A I'm sorry, yes. 11:46:53
19 Q Exhibit 20 is what you referred to as 11:46:55
20 Kang 395 in your report, right? 11:46:59
21 A Yes. 11:47:01
22 Q I would like to direct your attention back 11:47:01

1 CERTIFICATE OF STENOGRAPHIC SHORTHAND REPORTER
2 I, Susan S. Klinger, Registered Merit Reporter
3 and certified stenographic reporter of the States
4 of Texas, California and New Mexico, before whom
5 the foregoing deposition was taken, do hereby
6 certify that the foregoing transcript is a true
7 and correct record of the testimony given; that
8 said testimony was taken by me stenographically
9 and thereafter reduced to typewriting under my
10 direction; and that I am neither counsel for,
11 related to, nor employed by any of the parties to
12 this case and have no interest, financial or
13 otherwise, in its outcome.
14 IN WITNESS WHEREOF, I have hereunto set my hand
15 this 18th day of September, 2023.
16
17
18 Susan S. Klinger
19 Susan S. Klinger, RMR-CRR, CSR
20 Texas CSR 6531, Exp: 10/31/25
21 California CSR 14487, Exp: 11/30/23
22 New Mexico CSR 572, Exp: 12/31/24