1 JUNE ANN MUNFORD
2 UNITED STATES PATENT AND TRADEMARK OFFICE
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD
4 - - -
5 DISH NETWORK, LLC, : CASE:
: IPR2024-000373
6 PETITIONER, :
: U.S. PATENT NO.
7 vs. : 7,594,249
:
8 ENTROPIC COMMUNICATIONS, : CASE:
INC., : IPR2024-000393
9 :
PATENT OWNER. : U.S. PATENT NO.
10 : 7,295,518
:
11 :
12 - - -
13 REMOTE DEPOSITION OF
14 JUNE ANN MUNFORD
15 - - -
16 Taken remotely, via Zoom, on
17 Thursday, February 20th, 2025, beginning at
18 12:00 p.m. EST, before Beau Dillard, RPR, a
19 Notary Public in and for the Commonwealth of
20 Pennsylvania.
21 - - -
22 VERITEXT LEGAL SOLUTIONS
MID-ATLANTIC REGION
23
- - -
24
25

1 JUNE ANN MUNFORD
2 A P P E A R A N C E S :
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JUNE ANN MUNFORD

I N D E X

- - -

EXAMINATION	PAGE
JUNE ANN MUNFORD	
BY MR. HALVERSON	6

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E X H I B I T S

- - -

NUMBER	DESCRIPTION	PAGE
Exhibit 1031	DISH-1031 Second Munford Declaration	8

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JUNE ANN MUNFORD

DEPOSITION SUPPORT INDEX

DIRECTION TO WITNESS NOT TO ANSWER

Page	Line
None	

REQUEST FOR PRODUCTION OF DOCUMENTS

Page	Line	Description
None		

STIPULATIONS

Page	Line
5	1

QUESTIONS MARKED

Page	Line
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.

JUNE ANN MUNFORD

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

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

Is that all right?

A. That's good with me.

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

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

Is that fair?

A. That's fair.

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

Is that fair?

A. That's fair.

Q. And do you have access to the

JUNE ANN MUNFORD

Exhibit Share program this morning?

A. I do not.

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

A. Not readily accessible.

Q. All right.

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

- - -

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

- - -

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

- - -

BY MR. HALVERSON:

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

Is that right?

A. That's correct.

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

JUNE ANN MUNFORD

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

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

A. Okay.

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

A. It is.

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

A. I did.

Q. Do you stand by everything in this declaration?

A. I do.

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

A. Not that I'm aware of.

Q. All right.

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

A. I'm there.

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

JUNE ANN MUNFORD

resources, and the sentence goes.

Do you see that sentence?

A. I do.

Q. What is a POSITA?

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

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

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

A. Not without speculating.

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

A. I do not.

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

A. I do not, without speculating.

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

JUNE ANN MUNFORD

that conclusion?

MR. AMER: Objection. Form.

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

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

BY MR. HALVERSON:

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

MR. AMER: Objection. Form.

THE WITNESS: Correct. Correct.

BY MR. HALVERSON:

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

JUNE ANN MUNFORD

A. I have not.

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

A. I have not.

Q. Have you ever worked at a research library?

A. I have not.

Q. What kind of libraries have you worked at?

A. Public libraries.

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

A. Correct.

Q. And which public libraries have you worked at?

A. I've worked at the Hart Public Library in Hart, Michigan. The Anchorage Public Library in Anchorage, Alaska, and the Dowagiac Public Library in Dowagiac, Michigan.

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

JUNE ANN MUNFORD

A. I did.

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

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

Q. At approximately what point in time?

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

Q. That's okay.

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

MR. AMER: Objection. Vague.

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

BY MR. HALVERSON:

Q. Yeah.

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

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

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

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

Q. Yes.

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

Q. And how do you know?

MR. AMER: Objection. Vague.

THE WITNESS: Generally speaking, assisting a member of the

JUNE ANN MUNFORD

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

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

BY MR. HALVERSON:

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

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

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

A. Sure.

One example would be a college

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

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

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

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

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

A. I am there.

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

Do you see that?

A. I do.

JUNE ANN MUNFORD

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

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

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

Q. I see.

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

A. I believe that describing it as

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

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

Q. Understood.

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

A. I am there.

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

A. Correct.

Q. What is IEEE Xplore?

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

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

A. I wouldn't know without

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

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

MR. AMER: Objection. Form.

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

BY MR. HALVERSON:

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

A. Yes. I'm there.

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

Is that right?

A. That's correct.

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

A. Correct.

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

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

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

Is it somewhere else in the page?

A. I don't see it anywhere.

It's possible that the field got cut off in the process of capturing the page.

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

A. Okay. I'm there.

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

Is that right?

A. That's correct.

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

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

JUNE ANN MUNFORD

IEEE Xplore, August 6th, 2002.

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

MR. AMER: Objection. Form.

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

BY MR. HALVERSON:

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

A. I'm there.

Q. Talking back about MARC records again.

Do you see that?

A. I do.

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

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

A. When you describe the data input

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

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

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

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

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

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

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

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

A. I'm there.

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

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

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

Is that fair?

A. That's correct.

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

JUNE ANN MUNFORD

sort of subject matter-based way, right?

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

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

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

A. Correct.

Q. And it's been published for decades?

A. Yes.

Q. And so there would be one MARC record for the National Geographic magazine.

Is that right?

A. Typically, yes.

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

A. That is a possibility.

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

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

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

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

A. Correct.

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

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

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

Is that right?

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

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

A. Correct.

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

A. Correct.

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

MR. AMER: Objection. Vague.

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

BY MR. HALVERSON:

Q. What is a monograph?

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

Q. How do MARC records for theories

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

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

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

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

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

Is that right?

Do you see that in Paragraph 2?

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

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

Q. No. You're right.

I just read a lot of numbers.

That's on me.

A. That's okay.

Q. Without first pointing you to paragraph.

JUNE ANN MUNFORD

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

A. Correct.

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

Is that right?

A. That's correct.

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

Is that fair?

A. That is fair.

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

A. Correct.

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

Thank you, Ms. Munford.

THE WITNESS: Thank you.

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

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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

1 DEPOSITION REVIEW
CERTIFICATION OF WITNESS
2
ASSIGNMENT REFERENCE NO: 7181789
3 CASE NAME: Dish Network, LLC v. Entropic Communications, Inc.
DATE OF DEPOSITION: 2/20/2025
4 WITNESS' NAME: June Ann Munford
5 In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
6 my testimony or it has been read to me.
7 I have made no changes to the testimony
as transcribed by the court reporter.
8
_____ _____
9 Date June Ann Munford
10 Sworn to and subscribed before me, a
Notary Public in and for the State and County,
11 the referenced witness did personally appear
and acknowledge that:
12
They have read the transcript;
13 They signed the foregoing Sworn
Statement; and
14 Their execution of this Statement is of
their free act and deed.
15
I have affixed my name and official seal
16
this _____ day of_____, 20____.
17
_____
18 Notary Public
19 _____
Commission Expiration Date
20
21
22
23
24
25

1 DEPOSITION REVIEW
CERTIFICATION OF WITNESS
2
ASSIGNMENT REFERENCE NO: 7181789
3 CASE NAME: Dish Network, LLC v. Entropic Communications, Inc.
DATE OF DEPOSITION: 2/20/2025
4 WITNESS' NAME: June Ann Munford
5 In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
6 my testimony or it has been read to me.
7 I have listed my changes on the attached
Errata Sheet, listing page and line numbers as
8 well as the reason(s) for the change(s).
9 I request that these changes be entered
as part of the record of my testimony.
10
I have executed the Errata Sheet, as well
11 as this Certificate, and request and authorize
that both be appended to the transcript of my
12 testimony and be incorporated therein.
13 _____ _____
Date June Ann Munford
14
Sworn to and subscribed before me, a
15 Notary Public in and for the State and County,
the referenced witness did personally appear
16 and acknowledge that:
17 They have read the transcript;
They have listed all of their corrections
18 in the appended Errata Sheet;
They signed the foregoing Sworn
19 Statement; and
Their execution of this Statement is of
20 their free act and deed.
21 I have affixed my name and official seal
22 this _____ day of_____, 20____.
23 _____
Notary Public
24
_____
25 Commission Expiration Date

1 ERRATA SHEET
VERITEXT LEGAL SOLUTIONS MIDWEST
2 ASSIGNMENT NO: 7181789
3 PAGE/LINE(S) / CHANGE /REASON
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20 Date June Ann Munford
21 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____
22 DAY OF _____, 20_____ .
23 _____
Notary Public
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25 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

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