

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
CEVA SANTE ANIMALE S.A.,)
EGG-CHICK AUTOMATED)
TECHNOLOGIES S.A.S., and) Case No. IPR2024-00595
CEVA ANIMAL HEALTH, LLC,)
)
) U.S. Patent No.
) 10,806,124
)
)
)
TARGAN, INC.,)
)
)
) Patent Owner.

REMOTE ORAL DEPOSITION OF
SHAWN LECROY
APRIL 15, 2025

On the 15th day of April, 2025, from 8:58 a.m. CDT to 10:12 a.m. CDT, the remote oral deposition of the above-named witness, was taken at the instance of the Patent Owner, before Karen L. Shelton, RDR, CRR, CSR in and for the State of Texas, the witness appearing from Longview, Texas, pursuant to 37 C.F.R., Section 42.53, and any provisions stated on the record or attached hereto.

<p>1 A. Okay.</p> <p>2 Q. And Mr. LeCroy, do you understand you are</p> <p>3 under oath today?</p> <p>4 A. I do.</p> <p>5 Q. Okay. Is there any reason you cannot</p> <p>6 answer my questions accurately and truthfully today?</p> <p>7 A. No.</p> <p>8 Q. I'm going to introduce the first exhibit.</p> <p>9 Just give me a moment to bring it up.</p> <p>10 (LeCroy Exhibit 1 marked)</p> <p>11 MR. ROBSON: And for the record, I'm</p> <p>12 displaying to the witness what is Paper Number 27 in</p> <p>13 the proceeding.</p> <p>14 Q. Mr. LeCroy, do you see that this is titled</p> <p>15 "Notice of Deposition of Shawn LeCroy"?</p> <p>16 A. I do.</p> <p>17 Q. And is it your understanding that you're</p> <p>18 being deposed today because you submitted a</p> <p>19 declaration in connection with IPR number</p> <p>20 2024-00595?</p> <p>21 A. Yes.</p> <p>22 Q. And I'm going to take down Paper 27.</p> <p>23 So Mr. LeCroy, you're being deposed</p> <p>24 remotely, right?</p> <p>25 A. Yes.</p> <p style="text-align: right;">Page 6</p>	<p>1 Q. Okay. And do you see where it says patent</p> <p>2 owner is Targan, Inc.?</p> <p>3 A. I do.</p> <p>4 Q. Likewise, can we have an understanding</p> <p>5 that when I refer to "patent owner," I am speaking</p> <p>6 of Targan, Inc.?</p> <p>7 A. Yes.</p> <p>8 Q. Did you do anything to prepare for your</p> <p>9 deposition today?</p> <p>10 A. I did not.</p> <p>11 Q. Did you meet with counsel at any point to</p> <p>12 prepare for your deposition?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And how long did you meet with</p> <p>15 counsel to prepare?</p> <p>16 A. We probably met for an hour and a half.</p> <p>17 Q. And that's the total amount of time you</p> <p>18 met to prepare for your deposition?</p> <p>19 A. Other than phone calls earlier on. But as</p> <p>20 far as the deposition, yes.</p> <p>21 Q. Okay. What about to prepare your expert</p> <p>22 declaration? Did you speak to anyone, speaking</p> <p>23 about besides counsel, to prepare your expert</p> <p>24 declaration?</p> <p>25 A. I did not.</p> <p style="text-align: right;">Page 8</p>
<p>1 Q. Okay. And could you recite who is there</p> <p>2 in the room with you?</p> <p>3 A. Andy Ollis.</p> <p>4 Q. Okay. And -- okay. I see Cristina Lai is</p> <p>5 joining remotely. Is there anyone else in the room</p> <p>6 with you besides Andy, Mr. Ollis?</p> <p>7 A. There is not.</p> <p>8 Q. And do you have any papers or documents</p> <p>9 with you besides printouts of the documents that you</p> <p>10 cite in your report?</p> <p>11 A. I do not have any documents. Andy has</p> <p>12 some documents.</p> <p>13 Q. Okay. Thank you. Can you just tell me</p> <p>14 what windows you have open on your screen right now?</p> <p>15 A. I just have this window, the Zoom meeting.</p> <p>16 Q. Thank you. Mr. LeCroy, actually I'm just</p> <p>17 going to put up for my next question, just to make</p> <p>18 this easier, I'm going to put up Paper 27 again.</p> <p>19 So Mr. LeCroy, do you see where it says</p> <p>20 "petitioners" and then it lists three companies?</p> <p>21 A. I do.</p> <p>22 Q. Okay. Can we have an understanding that</p> <p>23 if I refer to "petitioners" today in my questions</p> <p>24 that I'm referring to these three companies?</p> <p>25 A. Yes.</p> <p style="text-align: right;">Page 7</p>	<p>1 Q. Do you know approximately how many hours</p> <p>2 you spent preparing your declaration?</p> <p>3 A. Approximately probably three hours.</p> <p>4 Q. Have you -- had you heard of any of the</p> <p>5 petitioners before this patent office proceeding?</p> <p>6 A. I had.</p> <p>7 Q. Okay. And which ones had you heard of?</p> <p>8 A. I had heard of Targan and Ceva.</p> <p>9 Q. Okay. When did you first hear of Ceva?</p> <p>10 A. I've known of Ceva for several years as a</p> <p>11 vaccine company within the poultry industry.</p> <p>12 Q. Okay. Have you ever done any work in</p> <p>13 connection with Ceva?</p> <p>14 A. I have not.</p> <p>15 Q. Have any of the companies you've been</p> <p>16 involved with had any form of business relationship</p> <p>17 with Ceva?</p> <p>18 A. A lot of my poultry customers do business</p> <p>19 with Ceva.</p> <p>20 Q. And can you tell me which poultry</p> <p>21 companies or customers, excuse me --</p> <p>22 A. I'm sorry. I can't --</p> <p>23 MR. OLLIS: Matt, Counsel, if I could just</p> <p>24 take a one-minute break. They are vacuuming outside</p> <p>25 the conference room. It's a little bit noisy.</p> <p style="text-align: right;">Page 9</p>

3 (Pages 6 - 9)

<p>1 Hopefully they'll be finished shortly, but I might 2 go see if I can get them to -- oh, they stopped for 3 the moment. If that starts back up, I may go step 4 out and see if I can get them to hold off on that 5 until later.</p> <p>6 MR. ROBSON: Okay. Sure.</p> <p>7 MR. OLLIS: For the moment they've 8 stopped. Sorry, Counsel, you can continue anytime. 9 It did stop, so hopefully it'll stay that way.</p> <p>10 MR. ROBSON: Okay.</p> <p>11 Q. Just before that little break, Mr. LeCroy, 12 you mentioned that a lot of your poultry customers 13 do business with Ceva. Can you let me know what 14 poultry customers those are?</p> <p>15 A. I believe Tyson does some business with 16 Ceva. Pilgrim's may at times. There are -- Lincoln 17 Premium Poultry may do some business with Ceva at 18 times. I don't know the regards at which -- how 19 much business they do with Ceva, though.</p> <p>20 Q. Starting with Tyson, do you know what the 21 nature of their business relationship is with -- 22 excuse me -- with Ceva?</p> <p>23 A. I would say that the majority of what I 24 see Ceva is like spray cabinets on chick processing 25 lines for vaccine.</p> <p style="text-align: right;">Page 10</p>	<p>1 customers, can you just describe what the nature of 2 your business relationship is with Tyson, Pilgrim's, 3 and Lincoln?</p> <p>4 A. So I do service work on the automation 5 equipment.</p> <p>6 Q. And what does that entail, service work?</p> <p>7 A. So it could be troubleshooting issues with 8 the equipment if it breaks down, you know, minor 9 modifications to the existing equipment, you know, 10 personnel training, robot programming, PLC 11 programming. That's kind of the nature which I do 12 business in the poultry industry.</p> <p>13 Q. And Mr. LeCroy, are you aware of how any 14 of these customers, Tyson, Pilgrim's, and Lincoln, 15 perform chick sexing operations?</p> <p>16 A. All of those customers do not perform 17 chick sexing, the ones that I have -- that I have 18 dealings with, yeah.</p> <p>19 Q. Okay. Have you personally ever worked on 20 any automated chick sexing machinery?</p> <p>21 A. Yes.</p> <p>22 Q. That's in connection with other customers, 23 I take it, besides Tyson, Pilgrim's, and Lincoln?</p> <p>24 A. Yeah. So Pilgrim's I know does some 25 sexing. The customers I deal with Pilgrim's, those</p> <p style="text-align: right;">Page 12</p>
<p>1 Q. Okay. And do you know if Tyson uses 2 Ceva's automated chicken -- chick sexing services?</p> <p>3 A. I have not seen any.</p> <p>4 Q. Are you familiar with what Ceva's system 5 is for doing automated chick sexing?</p> <p>6 A. I am not familiar with the system itself, 7 no, only that they do it.</p> <p>8 Q. Okay. You've never seen the system?</p> <p>9 A. I have not.</p> <p>10 Q. With respect to Pilgrim's, do you know 11 what the nature of the business relationship is 12 between Ceva and Pilgrim's?</p> <p>13 A. It'll be the same, spray vaccine.</p> <p>14 Q. And same question for Lincoln Premium.</p> <p>15 A. Yeah, same thing, spray -- spray vaccine, 16 yeah.</p> <p>17 Q. Do you know whether Ceva is offering its 18 chicken sexing automated solution to any customers 19 in the United States?</p> <p>20 A. I do not.</p> <p>21 Q. So besides Tyson, Pilgrim's, and Lincoln, 22 are you aware of any others of your poultry 23 customers that do business with Ceva?</p> <p>24 A. I'm not aware firsthand, no.</p> <p>25 Q. Okay. And when you say they're your</p> <p style="text-align: right;">Page 11</p>	<p>1 currently do not. But in some former roles, I did 2 install some manual sexing equipment with Pilgrim's.</p> <p>3 Q. Okay. So my question is a little bit 4 different. Have you ever worked on an automated 5 chick sexing machine?</p> <p>6 A. So clarify "automated," because the manual 7 is -- does have automation in it. It has automated 8 counters inside the manual sexing equipment.</p> <p>9 Q. Okay. I understand. And let me clarify. 10 So you're aware from your work in this 11 case that there are chick sexing automated processes 12 that use images of chicks in order to do the sexing, 13 right?</p> <p>14 A. Correct, yes.</p> <p>15 Q. Have you personally ever worked on a 16 machine that would do chick sexing based on images 17 of the chick?</p> <p>18 A. No.</p> <p>19 Q. And is it fair to say that you've never 20 personally had any experience with modifying a 21 system that performs chick sexing manually into one 22 that performs chick sexing via image processing?</p> <p>23 MR. OLLIS: Objection, form.</p> <p>24 You can answer.</p> <p>25 A. That will be correct.</p> <p style="text-align: right;">Page 13</p>

<p>1 Q. And so besides your -- the poultry 2 customers that you just listed having business 3 relationships with Ceva, do you have any other -- 4 have you had any other -- well, let's strike that. 5 That's a bad question. 6 Have you ever done business in any 7 capacity with Ceva other than the fact that some of 8 your poultry customers do business with Ceva? 9 A. No. 10 Q. And you mentioned that you had heard of 11 Targan prior to this suit, right? 12 A. Yes. 13 Q. Okay. How were you aware of Targan? 14 A. Through just publications, LinkedIn 15 notifications, that sort of thing. 16 Q. Okay. But none of your customers do 17 business with Targan, to the best of your knowledge? 18 A. To my knowledge, no. 19 Q. Do you know anyone personally that works 20 at Ceva? 21 A. Yes. 22 Q. Okay. And who would that be? 23 A. I know Steve Culwell and James Greenlee. 24 Q. Do you know what Mr. Culwell's position 25 is?</p> <p style="text-align: right;">Page 14</p>	<p>1 Q. Okay. How do you know Mr. Greenlee? 2 A. Same thing. He worked for Embrex. 3 Q. What is the nature of Embrex's business? 4 A. Embrex was the in ovo vaccination company 5 that leases equipment to most poultry producers. 6 They later became Pfizer and Zoetis. 7 Q. And what did you do when you worked at 8 Embrex? 9 A. So at Embrex, I started as a field service 10 technician. I moved into technical service, the 11 biological side, and then I went into territory 12 management managing field service technicians and 13 then later into the automation side. 14 Q. Do you have any investments or other 15 financial interest in Ceva? 16 A. I do not. 17 Q. Have you ever heard, prior to your work in 18 this proceeding, of the inventor of the 19 patent-in-suit, Ramin Karimpour? 20 A. I have heard of Ramin. 21 Q. And how did you -- in what capacity have 22 you heard of Ramin? 23 A. I'd heard of Ramin when I worked for 24 Zoetis. 25 Q. And what was the context of that?</p> <p style="text-align: right;">Page 16</p>
<p>1 A. He is -- I don't know his exact position, 2 but I know he's with their spray cabinet vaccine 3 equipment. 4 Q. And how do you know him? 5 A. Through, you know, hatchery experience as 6 far as we'll be at the same customer occasionally. 7 In the past, he worked for the same company I did, 8 Embrex, and that's how I know Steve. 9 Q. And why would you be at the same customer 10 with Mr. Culwell? 11 A. So the customer would call us in to do -- 12 say a robot went down. We may be on site fixing a 13 robot, and they may be in working on spray cabinets. 14 It's just different trades in for different -- 15 different scenarios. 16 Q. So do you do work on spray cabinets 17 provided by Ceva? 18 A. I do not. 19 Q. And you also mentioned a James -- I think 20 it was -- 21 A. Greenlee. 22 Q. Greenlee? 23 A. Yeah. 24 Q. Do you know what his title is at Ceva? 25 A. I do not.</p> <p style="text-align: right;">Page 15</p>	<p>1 A. I only knew him that he was an engineer. 2 That's all I knew. 3 Q. And do you recall how his name came up 4 while you were at Zoetis? 5 A. Just in conversation, people talking about 6 him. 7 Q. What were they saying about him? 8 A. Just that he was an engineer. 9 Q. When you say that he was an engineer, did 10 you know where he was an engineer? 11 A. I didn't know what capacity at which he 12 was an engineer, no. 13 Q. Do you recall when you were first retained 14 as an expert by the petitioners? 15 A. I'd have to check my schedule, but I think 16 it was the first of January of this year. 17 Q. Who was it that first contacted you about 18 serving as an expert in this matter? 19 A. Steve Culwell first called me. 20 Q. Were there any attorneys for petitioners 21 on the line with Steve Culwell? 22 A. No, not at that time, no. 23 Q. What did Mr. Culwell tell you about this 24 proceeding? 25 A. All he told me was that he -- that there</p> <p style="text-align: right;">Page 17</p>

5 (Pages 14 - 17)

<p>1 were going to be a Ceva lawyer contact me. 2 Q. Nothing else about this case other than -- 3 A. No. 4 Q. -- the Ceva lawyer was going to contact 5 you? 6 A. Yeah, that was it. 7 Q. I'm going to pull up the next exhibit 8 that's been marked in this proceeding, Exhibit 1008. 9 Mr. LeCroy, you probably have a paper copy of this 10 that's your declaration. 11 MR. OLLIS: He does now. 12 A. Yes. 13 Q. My first question to you, Mr. LeCroy, is, 14 is this the declaration that you submitted in 15 connection with this IPR proceeding? 16 A. Yes. 17 Q. Go to the final page, page 25. Is that 18 your signature there? 19 A. That is. 20 Q. So let's turn to page 1 of your 21 declaration. And I'm going to direct you to 22 paragraph 2. And do you see in paragraph 2, you 23 say, "I have reviewed several documents that I 24 understand are involved in this proceeding, 25 including the following." Do you see that?</p> <p style="text-align: right;">Page 18</p>	<p>1 A. I have not. 2 Q. Okay. Mr. LeCroy, have you ever served as 3 an expert witness before? 4 A. I have not. 5 Q. And do you have any experience with patent 6 litigation prior to this proceeding? 7 A. I do not. 8 Q. And you're not an attorney, right? 9 A. I am not. 10 Q. I'm going to take down Exhibit 1008 for 11 the time being. I'm going to display the next 12 exhibit, what's been marked in this proceeding as 13 Exhibit 1005. 14 Mr. LeCroy, do you recognize this as a 15 document that you reviewed in connection with your 16 declaration? 17 A. Yes. 18 Q. And this is the -- I'm going to refer to 19 this as the Yavnai reference. Is that okay? 20 A. The what? I'm sorry? 21 Q. I will refer to this in my questioning as 22 the Yavnai reference. Do you understand? 23 A. I do. 24 Q. I'm going to turn in the reference first 25 to Figure 5B. I'm going to rotate it so that it's</p> <p style="text-align: right;">Page 20</p>
<p>1 A. I do. 2 Q. And then you list five documents. Is that 3 right? 4 A. Correct. 5 Q. Did you review any documents other than 6 these five in connection with this proceeding? 7 A. I did not. 8 Q. So you never reviewed the declaration of 9 Dr. Kevin Keener submitted by patent owner? Is that 10 right? 11 A. I did not. 12 Q. And you never reviewed the declaration of 13 Dr. Lina Karam submitted by patent owner? Is that 14 right? 15 A. I did not. 16 Q. Are you familiar with what a prosecution 17 history is for a patent? 18 A. I do not. 19 Q. In a nutshell, that is a record of the 20 back-and-forth with the patent office between the 21 applicant and the -- well, the examiner for a 22 patent. Do you understand that? 23 A. I do. 24 Q. And I take it you've never reviewed the 25 prosecution history for the '124 patent, right?</p> <p style="text-align: right;">Page 19</p>	<p>1 upright and we can see it better. 2 Okay. And Mr. LeCroy, you reviewed Figure 3 5B for purposes of your declaration, right? 4 A. I did. 5 Q. And Figure 5B shows the point where a 6 chick's image is taken, right? 7 A. Where? Say that again? Sorry. 8 Q. Is it correct that Figure 5B shows the 9 point at which a chick's image is taken in this 10 process? 11 A. I would have to make an assumption as 12 that's where the image is being taken. 13 Q. Are you familiar with what Block 48 is 14 here? 15 A. Would have to reference that. 16 Q. I can help you. If you look at paragraph 17 39 of Yavnai, that might help answer that question. 18 A. Okay. Yeah, I see that. 19 Q. Now, in this figure, Figure 5B, it shows 20 that the chicks are open to the point where they are 21 nearly up to the chick's shoulders, right? 22 A. Yes. 23 Q. And under each wing there is a pole 24 labeled "64," right? 25 A. Correct.</p> <p style="text-align: right;">Page 21</p>

<p>1 Q. And the poles keep the chick's wings open, 2 right?</p> <p>3 A. It appears that they're supporting the 4 wings.</p> <p>5 Q. And the way they support it is they keep 6 the chick's wings open, right?</p> <p>7 A. Correct.</p> <p>8 Q. And another purpose of the poles, 64, is 9 to ensure that the chick does not close its wings, 10 right?</p> <p>11 A. I would say that's the intention, correct.</p> <p>12 Q. Well, we can agree, right, that the chick 13 shown in Figure 5B isn't going to be able to close 14 its wings because the poles are under its wings, 15 right?</p> <p>16 A. With that diagram, the chick could still 17 close its wings.</p> <p>18 Q. It's your testimony that in that diagram 19 with poles underneath the chick's wings, it can 20 still close its wings?</p> <p>21 A. Yes. There's a gap between the chick and 22 the poles.</p> <p>23 Q. Do you think it's the intent of the Yavnai 24 system that when the chick has the poles under its 25 wings, it be able to close its wings?</p> <p style="text-align: right;">Page 22</p>	<p>1 move at all.</p> <p>2 Q. So a restrained chick is one that can't 3 move forward, backward, or have its wings move?</p> <p>4 A. Yes, or -- a restrained chick would be one 5 that is being basically held in place.</p> <p>6 Q. Okay. So I would take it that you 7 disagree that the definition of unrestrained chick 8 is one that is able to freely move its wings?</p> <p>9 A. Repeat your question again?</p> <p>10 Q. So I understand you've offered this 11 definition of unrestrained chick, and I understand 12 that. Would you agree that another definition of 13 unrestrained chick would be a chick that is able to 14 freely move its wings?</p> <p>15 A. That could be part of being -- being 16 unrestrained.</p> <p>17 Q. So is it correct that if a chick can't 18 freely move its wings, then it is not an 19 unrestrained chick?</p> <p>20 MR. OLLIS: Objection, form.</p> <p>21 A. I would say that just because the chick 22 can't move its wing does not mean that it's -- that 23 it's being restrained. There's more to restraining 24 a chick than just its wings being held out.</p> <p>25 Q. So in your view, a chick can have --</p> <p style="text-align: right;">Page 24</p>
<p>1 A. I would say the intent is to support the 2 wings open, yes.</p> <p>3 Q. Because the system isn't going to work 4 unless the chick's wings are open, right?</p> <p>5 MR. OLLIS: Objection, form.</p> <p>6 A. The system needs the chick's wings to be 7 open, correct. And the bars are there to support 8 the chicks, chick's wings, correct.</p> <p>9 Q. Okay. Well, and you would agree, right, 10 that the poles under the chick's wings will prevent 11 it from moving its wings freely, right?</p> <p>12 A. Correct.</p> <p>13 Q. And the movement of the chick's wings, 14 when the poles are under them, is going to be 15 restricted by the poles, right?</p> <p>16 A. I'm sorry. Say that again? Sorry.</p> <p>17 Q. When the poles are under the chick's 18 wings, the movement of the wings is going to be 19 restricted, right?</p> <p>20 A. Correct.</p> <p>21 Q. Would you agree that an unrestrained chick 22 is one that is able to freely move its wings?</p> <p>23 MR. OLLIS: Objection, form.</p> <p>24 A. I would say that a restrained chick is one 25 that is being held in place that is not allowed to</p> <p style="text-align: right;">Page 23</p>	<p>1 strike that.</p> <p>2 So in your view, a chick can be unable to 3 freely move its wings and still be an unrestrained 4 chick?</p> <p>5 MR. OLLIS: Objection, form.</p> <p>6 A. I think I've already answered that.</p> <p>7 It's -- it's -- the chick, just because its wings 8 are propped up on the bar does not mean that the 9 chick is being restrained.</p> <p>10 Q. Okay. So in your view, a chick can be 11 unable to freely move its wings and still be an 12 unrestrained chick, right?</p> <p>13 A. Well, I think -- I think you're -- the 14 point at which you're saying the chick's wings are 15 fixed on these poles, the bird can still move its 16 wings forward and backwards. It just can't tuck 17 them next to the body. So the -- you know, they can 18 still move their wings. The wings are not being 19 restrained.</p> <p>20 Q. Okay. And Mr. LeCroy, I guess this might 21 be a bit of a misunderstanding of my question, so 22 let me clarify.</p> <p>23 I'm not speaking about Figure 5B in Yavnai 24 in particular. I'm talking about what it means to 25 be an unrestrained chick generally. Okay?</p> <p style="text-align: right;">Page 25</p>

<p>1 A. Okay.</p> <p>2 Q. Okay. And my question is, is it your view</p> <p>3 that a chick can be unable to freely move its wings</p> <p>4 yet still qualify as an unrestrained chick?</p> <p>5 A. If --</p> <p>6 MR. OLLIS: Objection, form.</p> <p>7 A. I would say if the chick is totally</p> <p>8 restrained, the wings are totally restrained, if</p> <p>9 you're holding the bird with its wings, then the</p> <p>10 bird is restrained.</p> <p>11 Q. What if you're not totally re- -- excuse</p> <p>12 me. Strike that.</p> <p>13 What if you're not holding the wings such</p> <p>14 that they cannot move at all but you're holding the</p> <p>15 wings such that they can't move at least to some</p> <p>16 degree? At that point would it be a restrained</p> <p>17 chick?</p> <p>18 MR. OLLIS: Objection, form.</p> <p>19 A. If the bird can move its wing, it's not</p> <p>20 restrained.</p> <p>21 Q. And if the bird can't freely move its</p> <p>22 wings, then it is restrained, right?</p> <p>23 A. If it's being held in place, yes, it's</p> <p>24 restrained.</p> <p>25 Q. If its wings are being held in place, then</p> <p style="text-align: right;">Page 26</p>	<p>1 then the system isn't going to be able to properly</p> <p>2 perform the sexing operation?</p> <p>3 A. Can't speak to that. But if the -- if the</p> <p>4 conveyor stops, the bird can still go forward. But</p> <p>5 if the wings are still up, the system could still</p> <p>6 take its image. Just because the conveyor stops or</p> <p>7 the bird can run forward, it's still the same</p> <p>8 motion. So if the bird's wings are being propped up</p> <p>9 on the bars and it moves forward, then the system</p> <p>10 should be able to operate as intended.</p> <p>11 Q. Well, surely if the chick runs away before</p> <p>12 the image is taken, then the sexing operation can't</p> <p>13 be performed, right?</p> <p>14 A. If the -- if the bird is not being</p> <p>15 presented to the camera, then the image can't be</p> <p>16 taken. So, yes, it could not, it would not be able</p> <p>17 to work.</p> <p>18 Q. Do you think that a system that allows the</p> <p>19 bird to run away before the image is taken is a</p> <p>20 viable system for chicken sexing?</p> <p>21 A. So I didn't say the system would allow the</p> <p>22 bird to run away. I said the bird can move.</p> <p>23 However, if the conveyor is moving, the bird is</p> <p>24 going to stand still. It's just the nature at which</p> <p>25 the birds act in that environment. As those</p> <p style="text-align: right;">Page 28</p>
<p>1 it's restrained, right?</p> <p>2 A. If it cannot move its wings at all, it's</p> <p>3 restrained.</p> <p>4 Q. Okay. Turning now -- turning back to</p> <p>5 specifically Figure 5B, is it your view -- well,</p> <p>6 strike that.</p> <p>7 Turning back to Figure 5B, can the chick</p> <p>8 that is displayed there able to freely run away?</p> <p>9 A. Yes. There's nothing holding the bird in</p> <p>10 place.</p> <p>11 Q. Do you believe it's the intent of the</p> <p>12 design of the Yavnai system that the chick be able</p> <p>13 to freely run away at the point where the chick is</p> <p>14 depicted in 5B?</p> <p>15 A. The bird can move forward in the conveyor.</p> <p>16 The conveyor is moving, so the bird is moving. So</p> <p>17 the intent is for the bird to move forward.</p> <p>18 Q. But the -- it's the conveyor that's moving</p> <p>19 the bird forward, right?</p> <p>20 A. Yes.</p> <p>21 Q. Can the chick itself in the configuration</p> <p>22 it is in 5B, on its own volition and with its own</p> <p>23 legs, freely run away from the system?</p> <p>24 A. Yes. Sorry. Yes.</p> <p>25 Q. Isn't it true that if the bird runs away,</p> <p style="text-align: right;">Page 27</p>	<p>1 conveyors are moving, the birds typically try to</p> <p>2 just balance themselves and they stay put.</p> <p>3 Q. Okay. So would you agree -- well, let's</p> <p>4 do this. Strike that.</p> <p>5 Let's assume a situation where the</p> <p>6 conveyor belt is moving in Figure 5B with the chick</p> <p>7 on the conveyor. Okay?</p> <p>8 A. Uh-huh.</p> <p>9 Q. In that situation is the bird depicted in</p> <p>10 Figure 5B able to freely run away?</p> <p>11 A. I would say yes. But if the conveyor is</p> <p>12 moving, the bird is not going to be able to run away</p> <p>13 from the conveyor.</p> <p>14 Q. So if -- so in the situation where the</p> <p>15 conveyor is moving in Figure 5B, the bird is not</p> <p>16 going to be able to run away. Is that correct?</p> <p>17 A. It's not that it won't be able to. It's</p> <p>18 just basic bird behavior in those situations. You</p> <p>19 know, the bird is going to ride the conveyor when</p> <p>20 it's moving. It's not going to prevent it from</p> <p>21 running forward if it was to -- if the conveyor was</p> <p>22 to stop. Just typical bird behavior. The bird is</p> <p>23 going to stay on the conveyor as it's moving.</p> <p>24 Q. But we could agree, right, that the Yavnai</p> <p>25 system isn't designed such that the chick should be</p> <p style="text-align: right;">Page 29</p>

<p>1 able to run away before the image is taken of the 2 chick, right?</p> <p>3 A. I would say the intention is for it not to 4 run away, yes.</p> <p>5 Q. And one way that the Yavnai system ensures 6 the chick not run away is by putting poles under its 7 wings. Is that right?</p> <p>8 A. The poles are not what's keeping the bird 9 from running away, no.</p> <p>10 Q. What is keeping the bird from running 11 away?</p> <p>12 A. The conveyor moving is what's keeping the 13 bird from running away. And, you know, all 14 conveyors within a hatchery have side walls, so the 15 bird's not going to run off the side. Those are 16 animal health issues. You know, all conveyors will 17 have a side wall. So a basic conveyor design is 18 what's going to keep the bird from running away. 19 But the bars are to present the wings.</p> <p>20 Q. Well, you would agree, certainly, that the 21 bars are going to prevent the chick from running off 22 the platform laterally, right, in the left and right 23 direction?</p> <p>24 A. No.</p> <p>25 Q. How would a chick get past one of the</p> <p style="text-align: right;">Page 30</p>	<p>1 Q. As we went over before, you weren't 2 provided a full declaration -- a copy of the Keener 3 declaration, right?</p> <p>4 A. Correct.</p> <p>5 Q. Did you ever ask for a full copy of the 6 Keener declaration?</p> <p>7 A. I did not.</p> <p>8 Q. So you were provided, though, some 9 excerpts by counsel from the Keener declaration 10 directed to Gershman, right?</p> <p>11 A. Correct.</p> <p>12 Q. But you don't know one way or the other 13 whether you were provided the full discussion of the 14 Gershman reference from the Keener declaration, 15 right?</p> <p>16 A. I do not.</p> <p>17 Q. All right. So let's turn to Gershman 18 itself, and I'm going to direct you to page 5. 19 And do you see on page 5 where the 20 sentence which I've just highlighted where it says, 21 "Chickens were placed on plate manually and was 22 pushed down from a height of 20 centimeters on the 23 shock absorbers"? Do you see that?</p> <p>24 A. I do.</p> <p>25 Q. So the first step in this process that's</p> <p style="text-align: right;">Page 32</p>
<p>1 bars, 64, to leave the platform?</p> <p>2 A. I'm sorry? Say again?</p> <p>3 Q. You can strike that. I'll strike that 4 question.</p> <p>5 Would you agree that the poles, 64, under 6 the chick in Figure 5B will limit the ability of the 7 chick, at least to some degree, to move laterally?</p> <p>8 A. Yes.</p> <p>9 Q. And is one purpose of that to keep the 10 chick in the proper position so that it can have its 11 image taken?</p> <p>12 A. I would say yes, the pole -- the poles are 13 there to present the wings.</p> <p>14 Q. Okay. We can take Exhibit 1005 down. And 15 I'm going to turn to -- I'm going to project what's 16 been marked as Exhibit 1003. My first question to 17 you, Mr. LeCroy, is whether you've reviewed 18 Exhibit 1003 in connection with your expert report.</p> <p>19 A. I have.</p> <p>20 Q. This is the Gershman reference, right?</p> <p>21 A. Right.</p> <p>22 Q. And as we've gone over before, you weren't 23 provided a full copy of the Keener declaration, 24 right?</p> <p>25 A. Sorry?</p> <p style="text-align: right;">Page 31</p>	<p>1 being described is that the chick is placed on a 2 plate, right?</p> <p>3 A. Correct.</p> <p>4 Q. And at that point, when the chick is 5 placed on the plate, the plate is stationary, right?</p> <p>6 A. Correct.</p> <p>7 Q. And then after that, the plate is pushed 8 down from a height of 20 centimeters. Is that 9 right?</p> <p>10 A. Correct.</p> <p>11 Q. And when that happens, the plate drops out 12 from under the chick, right?</p> <p>13 A. Correct.</p> <p>14 Q. And Gershman describes how the plate drops 15 at a rate that's a little faster than gravitational 16 weight, G. Is that right?</p> <p>17 A. Correct.</p> <p>18 Q. Gershman doesn't state anywhere, right, 19 that the plate, during its acceleration down, will 20 drop at a rate of G or less, right?</p> <p>21 MR. OLLIS: Objection, form.</p> <p>22 A. Correct. But it also states that it's -- 23 the more than G is an initial acceleration.</p> <p>24 Q. Okay. But -- so I'm going to ask my 25 question again.</p> <p style="text-align: right;">Page 33</p>

<p>1 Gershman doesn't state anywhere, right, 2 that the plate, during its acceleration down, will 3 drop at a rate of G or less. Is that correct? 4 A. That's correct. 5 Q. And is it correct in Gershman that while 6 the chick is in free fall, that's when the image of 7 the chick is taken? 8 A. Yes, I'd agree with that. 9 Q. And at some point after the chick is in 10 free fall, it's going to land back on the plate, 11 right? 12 A. So it will land on the plate when the 13 plate stops or slows down. 14 Q. Okay. It's true, right, that after the 15 free fall, at some point the chick is going to be 16 back on that plate, right? 17 A. Correct. 18 Q. Okay. And Gershman doesn't state 19 anywhere, right, that you should take an image of 20 the chick when it is back on that plate after the 21 fall, right? 22 A. Correct. 23 Q. Okay. Now, going back to that -- the 24 falling state where the chick is falling and the 25 plate is being accelerated downward, it's true,</p> <p style="text-align: right;">Page 34</p>	<p>1 at a rate of G or less, right? 2 A. Correct. 3 Q. And the whole -- and one of the aspects of 4 Gershman is that when the chick's image is taken, 5 the chick is not going to be on the moving plate any 6 longer, right? 7 A. Correct. 8 Q. So given all that, it's accurate, right, 9 that the plate is going to hit the shock absorbers 10 before the chick does, right? 11 A. That's to make an assumption that the 12 plate is not going to decelerate, correct. 13 Q. Okay. At some point after the plate hits 14 the shock absorbers, the plate's going to come to a 15 stop, right? 16 A. Correct. 17 Q. And one purpose of those shock absorbers 18 is going to be to absorb the shock on the plate, 19 right? 20 A. Correct. 21 Q. Gershman doesn't state anywhere, right, 22 that the purpose of the shock absorbers is to 23 decelerate the chick, right? 24 A. No, but that's -- that's -- that's the 25 intent of that, obviously, is to -- is to help</p> <p style="text-align: right;">Page 36</p>
<p>1 right, at that point that the plate is going to be 2 moving downward faster than the chick is falling, 3 right? 4 A. Initially. At least initially. 5 Q. Well, does Gershman describe a situation 6 where -- strike that. 7 I think we established, right, that during 8 the acceleration downward, the plate is going to be 9 moving faster than G, right? 10 A. So it states that the initial acceleration 11 is more than gravity. 12 Q. Right. Does it ever state that after that 13 initial acceleration the plate is going to be moving 14 at gravity or less than gravitational acceleration? 15 A. It does not, but it also doesn't say it's 16 going to maintain that initial acceleration. If you 17 say "initial acceleration," it's meant to be that 18 that's what is going to happen at the start. But 19 there's always an acceleration and deceleration 20 phase of any kind of moving equipment. So it's kind 21 of understood that if you're going to start and stop 22 something, that you're going to have to decelerate 23 it. 24 Q. Okay. But at no point does Gershman say 25 that during the free fall the plate should be moving</p> <p style="text-align: right;">Page 35</p>	<p>1 absorb that plate and chick, the stop of those -- of 2 those two things. That's the purpose of a shock 3 absorber. 4 Q. Okay. But would you agree, yes or no, 5 that Gershman doesn't state anywhere that the 6 purpose of the shock absorbers is to decelerate the 7 chick? 8 MR. OLLIS: Objection, form. 9 A. I would say it is -- he does not state 10 that, correct. 11 Q. We're going to turn back now to your 12 declaration. If you want to pull out a paper copy, 13 I will pull up the electronic copy. 14 And I'm displaying on the screen right now 15 Exhibit 1008, the LeCroy declaration. I'm going to 16 direct you to paragraph 34 of your declaration. And 17 you'll let me know when you get there, Mr. LeCroy. 18 A. I'm there. 19 Q. Do you see in this paragraph, I'm going to 20 highlight it here, where it says, "However, Gershman 21 also describes the idea of having 'moving plates 22 with corresponding springs' and that he would 'push 23 the plate down.' These statements suggest to me 24 that Gershman also considered that the spring would 25 raise the plate and the chick, i.e., be a moving</p> <p style="text-align: right;">Page 37</p>

10 (Pages 34 - 37)

<p>1 platform supporting and lifting the chick back up to 2 its original level." Do you see that? 3 A. I do. 4 Q. So you're describing here the embodiment 5 where the chick, after it's dropped on the plate, is 6 lifted on the plate back up to the starting 7 position? Do I have that right? 8 A. So the way I understand that is basically 9 you could say that plate is pushed down really fast 10 and comes back up really fast. So it doesn't go to 11 a lower level. That's -- that's the way I interpret 12 that. 13 Q. Can you direct me to any disclosure in 14 Gershman where it says that the plate will come back 15 up really fast? 16 A. The way I interpret his -- when he says 17 the moving plate with corresponding springs to push 18 the plate down and it being to raise back up, 19 that's -- I mean, that's just the nature of being 20 able to use a shock absorber or a spring in that 21 application. 22 Q. Okay. Gershman, you'd agree, doesn't 23 state anywhere that the moving plate will come back 24 up after the drop, right? 25 A. Correct.</p> <p style="text-align: right;">Page 38</p>	<p>1 five-minute break as well, and if we can come 2 back -- hopefully it'll be even close to 11:10, but 3 five, six minutes. I'll see if we have anything 4 further on this side. 5 MR. ROBSON: Okay. 6 (Recess from 10:06 to 10:12) 7 MR. OLLIS: We have no further questions 8 either, so I believe we're done then for the day. 9 10 (Deposition concluded at 10:12 a.m. CDT) 11 -oOo- 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 40</p>
<p>1 Q. Okay. In the example system that he shows 2 in Figure 3 -- let me know if you want to pull that 3 up -- that doesn't show any means -- actually, 4 strike that. Strike that. 5 Okay. So this embodiment where the chick 6 is lifted back upwards on the plate, this is 7 something that you're reading into the Gershman 8 reference based on your background and 9 understanding. Is that fair? 10 MR. OLLIS: Objection to form. 11 You can answer. 12 A. That's fair. 13 MR. ROBSON: Okay. We can take a short -- 14 a short break if that works. 15 MR. OLLIS: How long would you like to 16 take, Matt? 17 MR. ROBSON: Let's do ten minutes. 18 MR. OLLIS: Okay. So 11:05? 19 MR. ROBSON: Yes, that works. 20 (Recess from 9:55 to 10:06) 21 MR. ROBSON: I don't have any further 22 questions for you, Mr. LeCroy. Thank you for your 23 time. 24 THE WITNESS: Thank you. 25 MR. OLLIS: If I could just take a</p> <p style="text-align: right;">Page 39</p>	<p>1 I, SHAWN LECROY, have read the foregoing 2 deposition and hereby affix by signature that same 3 is true and correct, except as noted above. 4 5 6 _____ 7 SHAWN LECROY 8 STATE OF _____) 9 COUNTY OF _____) 10 Before me, _____, on this 11 day personally appeared SHAWN LECROY, known to me 12 (or proved to me under oath or through 13 _____) (description of identity card or 14 other document) to be the person whose name is 15 subscribed to the foregoing instrument and 16 acknowledged to me that they executed the same for 17 the purposes and consideration therein expressed. 18 Given under my hand and seal of office 19 this _____ day of _____, 2025. 20 21 _____ 22 NOTARY PUBLIC IN AND FOR 23 THE STATE OF _____ 24 25 My Commission Expires: _____</p> <p style="text-align: right;">Page 41</p>

<p>1 UNITED STATES PATENT AND TRADEMARK OFFICE 2 BEFORE THE PATENT TRIAL AND APPEAL BOARD 3 CEVA SANTE ANIMALE S.A.,) EGG-CHICK AUTOMATED) 4 TECHNOLOGIES S.A.S., and) Case No. IPR2024-00595 CEVA ANIMAL HEALTH, LLC,) 5) Petitioners,) U.S. Patent No. 6) 10,806,124 vs.) 7) TARGAN, INC.,) 8) Patent Owner.) 9 _____) 10 REPORTER'S CERTIFICATE REMOTE ORAL DEPOSITION OF SHAWN LECROY 11 APRIL 15, 2025 12 I, KAREN L. SHELTON, a Certified Shorthand 13 Reporter in and for the State of Texas, hereby 14 certify to the following: 15 That the witness, SHAWN LECROY, was duly 16 sworn by the officer and that the transcript of the 17 oral deposition is a true record of the testimony 18 given by the witness; 19 I further certify that the signature by 20 the deponent: 21 <u> X </u> was requested by the deponent or a 22 party before the completion of the deposition and is 23 to be returned within 30 days from date of receipt 24 of the transcript. If returned, the attached Errata 25 contains any changes and the reasons therefor;</p> <p style="text-align: right;">Page 42</p>	<p>1 Andrew Ollis 2 aollis@oblon.com 3 APRIL 16, 2025 4 RE: Ceva Sante Animale SA v. Targan Inc 5 4/15/2025, Shawn LeCroy, (#7301631). 6 The above-referenced transcript has been 7 completed by Veritext Legal Solutions and 8 review of the transcript is being handled as follows: 9 <u> </u> Per CA State Code (CCP 2025.520 (a)-(e)) – Contact Veritext 10 to schedule a time to review the original transcript at 11 a Veritext office. 12 <u> </u> Per CA State Code (CCP 2025.520 (a)-(e)) – Locked .PDF 13 Transcript - The witness should review the transcript and 14 make any necessary corrections on the errata pages included 15 below, notating the page and line number of the corrections. 16 The witness should then sign and date the errata and penalty 17 of perjury pages and return the completed pages to all 18 appearing counsel within the period of time determined at 19 the deposition or provided by the Code of Civil Procedure. 20 Contact Veritext when the sealed original is required. 21 <u> </u> Waiving the CA Code of Civil Procedure per Stipulation of 22 Counsel - Original transcript to be released for signature 23 as determined at the deposition. 24 <u> </u> Signature Waived – Reading & Signature was waived at the 25 time of the deposition.</p> <p style="text-align: right;">Page 45</p>
<p>1 <u> </u> was not requested by the deponent or a 2 party before the completion of the deposition. 3 I further certify that I am neither 4 counsel for, related to, nor employed by any of the 5 parties in or counsel to this action, nor am I 6 financially or otherwise interested in the outcome 7 of this action. 8 Certified to by me this 16th day of April, 9 2025. 10 11 12  Karen L. Shelton, CSR, RDR, CRR 13 TX CSR 7050 Exp: 10/31/25 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 44</p>	<p>1 <u> X </u> Federal R&S Requested (FRCP 30(e)(1)(B)) – Locked .PDF 2 Transcript - The witness should review the transcript and 3 make any necessary corrections on the errata pages included 4 below, notating the page and line number of the corrections. 5 The witness should then sign and date the errata and penalty 6 of perjury pages and return the completed pages to all 7 appearing counsel within the period of time determined at 8 the deposition or provided by the Federal Rules. 9 <u> </u> Federal R&S Not Requested - Reading & Signature was not 10 requested before the completion of the deposition. 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 46</p>

12 (Pages 42, 44, 45, 46)

<p>1 Ceva Sante Animale SA v. Targan Inc</p> <p>2 Shawn LeCroy (#7301631)</p> <p>3 E R R A T A S H E E T</p> <p>4 PAGE____ LINE____ CHANGE_____</p> <p>5 _____</p> <p>6 REASON_____</p> <p>7 PAGE____ LINE____ CHANGE_____</p> <p>8 _____</p> <p>9 REASON_____</p> <p>10 PAGE____ LINE____ CHANGE_____</p> <p>11 _____</p> <p>12 REASON_____</p> <p>13 PAGE____ LINE____ CHANGE_____</p> <p>14 _____</p> <p>15 REASON_____</p> <p>16 PAGE____ LINE____ CHANGE_____</p> <p>17 _____</p> <p>18 REASON_____</p> <p>19 PAGE____ LINE____ CHANGE_____</p> <p>20 _____</p> <p>21 REASON_____</p> <p>22 _____</p> <p>23 _____</p> <p>24 (Shawn LeCroy) Date</p> <p>25 _____</p> <p style="text-align: right;">Page 47</p>	

[& - animal]

&	2001/0035370	5th 2:5	absorbers
& 2:4,11 4:8 45:24 46:9	3:16	6	32:23 36:9,14 36:17,22 37:6
1	2024-00595 6:20	6 3:11 64 21:24 22:8 31:1,5	accelerated 34:25
1 3:11 6:10 18:20 46:1	2025 1:12,15 41:19 42:11 44:9 45:3	7	acceleration 33:19,23 34:2 35:8,10,13,14 35:16,17,19
10,806,124 1:6 3:19 42:6	2025.520 45:9 45:12	703 2:12 7050 44:13 7301631 45:5 47:2	accurate 36:8 accurately 6:6
10/31/25 44:13	212 2:6	8	acknowledged 41:16
10016 2:6	22314 2:12	849-7000 2:6 8:58 1:16	act 28:25
1003 3:14 31:16,18	25 18:17	9	action 44:5,7
1005 3:15 20:13 31:14	27 6:12,22 7:18	9:55 39:20	actually 7:16 39:3
1008 3:17 18:8 20:10 37:15	295 2:5	a	affix 41:2
10:06 39:20 40:6	3 3 39:2 30 42:23 46:1 31 3:14 34 37:16 37 1:21 39 21:17	a.m. 1:16,16 40:10 a1 3:16 ability 31:6 able 22:13,25 23:22 24:8,13 27:8,12 28:1 28:10,16 29:10 29:12,16,17 30:1 38:20 above 1:17 41:3 45:6 absorb 36:18 37:1 absorber 37:3 38:20	agree 22:12 23:9,21 24:12 29:3,24 30:20 31:5 34:8 37:4 38:22
10:12 1:16 40:6 40:10	4 4 3:5 4/15/2025 45:5 413-3000 2:12 42.53 1:21 48 21:13		alexandria 2:12
11:05 39:18	5 5 32:18,19 5b 20:25 21:3,5 21:8,19 22:13 25:23 27:5,7 27:14,22 29:6 29:10,15 31:6		allow 28:21
11:10 40:2			allowed 23:25
124 19:25			allows 28:18
12566 44:12			amount 8:17
15 1:12 42:11			andrew 2:10 4:7 45:1
15th 1:15			andy 7:3,6,11
16 45:3			animal 1:4 30:16 42:4
16th 44:8			
18 3:17			
1940 2:11			
2			
2 3:3 18:22,22			
20 3:15 32:22 33:8			

[animale - certified]

animale 1:3 42:3 45:4 47:1 answer 5:12 6:6 13:24 21:17 39:11 answered 25:6 answers 5:1,4 anytime 10:8 aollis 2:13 45:2 appeal 1:2 42:2 appearances 3:3 4:3 appeared 41:11 appearing 1:20 45:18 46:7 appears 22:3 applicant 19:21 application 3:16 38:21 approximately 9:1,3 april 1:12,15 42:11 44:8 45:3 aspects 36:3 assume 5:17 29:5 assumption 21:11 36:11 attached 1:22 42:24 attorney 4:4 5:10 20:8 attorneys 17:20	automated 1:3 11:2,5,18 12:20 13:4,6,7 13:11 42:3 automation 12:4 13:7 16:13 avenue 2:5 aware 11:22,24 12:13 13:10 14:13 b b 3:9 46:1 back 10:3 19:20 27:4,7 34:10,16,20,23 37:11 38:1,6 38:10,14,18,23 39:6 40:2 background 39:8 backward 24:3 backwards 25:16 bad 14:5 balance 29:2 bar 25:8 bars 23:7 28:9 30:19,21 31:1 based 13:16 39:8 basic 29:18 30:17 basically 24:5 38:8	beginning 4:4 behalf 2:3,9 behavior 29:18 29:22 believe 10:15 27:11 40:8 belt 29:6 best 14:17 better 21:1 biological 16:11 bird 25:15 26:9 26:10,19,21 27:9,15,16,17 27:19,25 28:4 28:7,14,19,22 28:22,23 29:9 29:12,15,18,19 29:22,22 30:8 30:10,13,18 bird's 28:8 30:15 birds 28:25 29:1 bit 9:25 13:3 25:21 block 21:13 board 1:2 42:2 body 25:17 break 5:22,24 9:24 10:11 39:14 40:1 breaks 5:20 12:8	briefly 4:23 bring 6:9 business 9:16 9:18 10:13,15 10:17,19,21 11:11,23 12:2 12:12 14:2,6,8 14:17 16:3 c c 2:1 4:1 c.f.r. 1:21 ca 45:9,12,21 cabinet 15:2 cabinets 10:24 15:13,16 call 15:11 called 17:19 calls 8:19 camera 28:15 capacity 14:7 16:21 17:11 card 41:13 case 1:4 13:11 18:2 42:4 ccp 45:9,12 cdt 1:16,16 40:10 centimeters 32:22 33:8 certainly 30:20 certificate 42:10 certified 42:12 44:8
---	---	---	--

certify 42:14,19 44:3 ceva 1:3,4 4:9 9:8,9,10,13,17 9:19 10:13,16 10:17,19,22,24 11:12,17,23 14:3,7,8,20 15:17,24 16:15 18:1,4 42:3,4 45:4 47:1 ceva's 11:2,4 change 47:4,7 47:10,13,16,19 changes 42:25 check 17:15 chick 1:3 10:24 11:2,5 12:15 12:17,20 13:5 13:11,16,17,21 13:22 22:9,12 22:16,21,24 23:21,24 24:2 24:4,7,11,13,13 24:17,19,21,24 24:25 25:2,4,7 25:9,10,12,25 26:3,4,7,17 27:7,12,13,21 28:11 29:6,25 30:2,6,21,25 31:6,7,10 33:1 33:4,12 34:6,7 34:9,15,20,24 35:2 36:5,10	36:23 37:1,7 37:25 38:1,5 39:5 42:3 chick's 21:6,9 21:21 22:1,6 22:19 23:4,6,8 23:10,13,17 25:14 36:4 chicken 11:2,18 28:20 chickens 32:21 chicks 13:12 21:20 23:8 cite 7:10 civil 45:19,21 clai 2:13 clarify 5:17 13:6,9 25:22 close 22:9,13 22:17,20,25 40:2 code 45:9,12,19 45:21 come 36:14 38:14,23 40:1 comes 38:10 commission 41:25 companies 4:9 7:20,24 9:15 9:21 company 9:11 15:7 16:4 completed 45:7 45:17 46:6	completion 42:22 44:2 46:10 concerning 3:18 concluded 40:10 conference 9:25 configuration 27:21 connection 6:19 9:13 12:22 18:15 19:6 20:15 31:18 conscious 5:4 consideration 41:17 considered 37:24 contact 18:1,4 45:9,20 contacted 17:17 contains 42:25 context 16:25 continue 10:8 conversation 17:5 conveyor 27:15 27:16,18 28:4 28:6,23 29:6,7 29:11,13,15,19 29:21,23 30:12	30:17 conveyors 29:1 30:14,16 copy 18:9 31:23 32:2,5 37:12,13 correct 13:14 13:25 19:4 21:8,25 22:7 22:11 23:7,8 23:12,20 24:17 29:16 32:4,11 33:3,6,10,13,17 33:22 34:3,4,5 34:17,22 36:2 36:7,12,16,20 37:10 38:25 41:3 corrections 45:14,15 46:3 46:4 corresponding 37:22 38:17 counsel 4:2 8:11,15,23 9:23 10:8 32:9 44:4,5 45:18 45:22 46:7 counters 13:8 county 41:9 court 5:8 cristina 2:10 4:10 7:4 crr 1:19 44:12
---	---	--	--

csr 1:19 44:12 44:13 culwell 14:23 15:10 17:19,21 17:23 culwell's 14:24 currently 13:1 customer 15:6 15:9,11 customers 9:18 9:21 10:12,14 11:18,23 12:1 12:14,16,22,25 14:2,8,16	32:2,3,6,9,14 37:12,15,16 definition 24:7 24:11,12 degree 26:16 31:7 depicted 27:14 29:9 deponent 42:20 42:21 44:1 deposed 6:18 6:23 deposition 1:10 1:17 3:11 4:20 4:24 6:15 8:9 8:12,18,20 40:10 41:2 42:10,17,22 44:2 45:19,23 45:25 46:8,10 describe 12:1 35:5 described 33:1 describes 33:14 37:21 describing 38:4 description 3:10 41:13 design 27:12 30:17 designed 29:25 determined 45:18,23 46:7 diagram 22:16 22:18	different 13:4 15:14,14,15 difficult 5:7 direct 18:21 32:18 37:16 38:13 directed 32:10 direction 30:23 disagree 24:7 disclosure 38:13 discussion 32:13 display 20:11 displayed 27:8 displaying 6:12 37:14 document 20:15 41:14 documents 7:8 7:9,11,12 18:23 19:2,5 doing 11:5 downward 34:25 35:2,8 dr 19:9,13 drop 33:20 34:3 38:24 dropped 38:5 drops 33:11,14 duke 2:11 duly 4:13 42:15	e e 2:1,1,1,1 3:1,9 4:1,1,14 45:9 45:12 46:1 47:3,3,3 earlier 8:19 easier 7:18 egg 1:3 42:3 either 40:8 electronic 37:13 emanuel 2:4 4:6 embodiment 38:4 39:5 embrex 15:8 16:2,4,8,9 embrex's 16:3 employed 44:4 engineer 17:1,8 17:9,10,12 ensure 22:9 ensures 30:5 entail 12:6 environment 28:25 equipment 12:5,8,9 13:2,8 15:3 16:5 35:20 errata 42:24 45:14,16 46:3 46:5 established 35:7
d			
d 3:1 4:1 date 42:23 45:16 46:5 47:24 day 1:15 40:8 41:11,19 44:8 days 42:23 deal 12:25 dealings 12:18 decelerate 35:22 36:12,23 37:6 deceleration 35:19 declaration 3:18 6:19 8:22 8:24 9:2 18:10 18:14,21 19:8 19:12 20:16 21:3 31:23			

exact 15:1 examination 3:5 examiner 19:21 example 39:1 except 41:3 excerpts 32:9 excuse 9:21 10:22 26:11 executed 41:16 exhibit 3:11,14 3:15,17 6:8,10 18:7,8 20:10 20:12,13 31:14 31:16,18 37:15 exhibits 3:13 existing 12:9 exp 44:13 experience 13:20 15:5 20:5 expert 8:21,23 17:14,18 20:3 31:18 expires 41:25 expressed 41:17	familiar 11:4,6 19:16 21:13 far 8:20 15:6 fast 38:9,10,15 faster 33:15 35:2,9 federal 46:1,8,9 feel 5:22 field 16:9,12 figure 20:25 21:2,5,8,19,19 22:13 25:23 27:5,7 29:6,10 29:15 31:6 39:2 final 18:17 financial 16:15 financially 44:6 finished 10:1 first 4:13,25 6:8 9:9 17:13 17:16,17,19 18:13 20:24 31:16 32:25 firsthand 11:24 five 19:2,6 40:1 40:3 fixed 25:15 fixing 15:12 floor 2:5 following 18:25 42:14 follows 4:13 45:8	foregoing 41:1 41:15 form 9:16 13:23 23:5,23 24:20 25:5 26:6,18 33:21 37:8 39:10 former 13:1 forth 19:20 forward 24:3 25:16 27:15,17 27:19 28:4,7,9 29:21 frcp 46:1 free 34:6,10,15 35:25 freely 23:11,22 24:8,14,18 25:3,11 26:3 26:21 27:8,13 27:23 29:10 full 4:17 31:23 32:2,5,13 further 39:21 40:4,7 42:19 44:3	34:1,5,18 35:5 35:24 36:4,21 37:5,20,24 38:14,22 39:7 give 4:25 5:4 6:9 given 36:8 41:18 42:18 go 4:23 10:2,3 18:17 28:4 38:10 going 5:21 6:8 6:22 7:17,18 18:1,4,7,21 20:10,11,18,24 20:25 22:13 23:3,14,18 28:1,24 29:12 29:16,19,20,23 30:15,18,21 31:15,15 32:18 33:24 34:10,15 34:23 35:1,8 35:13,16,18,21 35:22 36:5,9 36:12,14,18 37:11,15,19 good 4:16 gravitational 33:15 35:14 gravity 35:11 35:14 greenlee 14:23 15:21,22 16:1
f		g	
fact 14:7 fair 13:19 39:9 39:12 fall 34:6,10,15 34:21 35:25 falling 34:24,24 35:2		g 4:1 33:16,20 33:23 34:3 35:9 36:1 gap 22:21 generally 25:25 gershman 3:14 31:20 32:10,14 32:17 33:14,18	

ground 4:24 guess 25:20	hopefully 10:1 10:9 40:2	intention 22:11 30:3	keep 5:21 22:1 22:5 30:18 31:9
h	hour 5:21 8:16 hours 9:1,3 huh 29:8	interest 16:15 interested 44:6 interpret 38:11 38:16	keeping 30:8 30:10,12
h 3:9 47:3 half 8:16 hand 41:18 handled 45:8 happen 35:18 happens 33:11 hatchery 15:5 30:14 heads 5:2 health 1:4 30:16 42:4 hear 9:9 heard 9:4,7,8 14:10 16:17,20 16:22,23 height 32:22 33:8 held 23:25 24:5 24:24 26:23,25 help 21:16,17 36:25 hereto 1:22 highlight 37:20 highlighted 32:20 history 19:17 19:25 hit 36:9 hits 36:13 hold 10:4 holding 26:9,13 26:14 27:9	i i.e. 37:25 idea 37:21 identity 41:13 image 13:22 21:6,9,12 28:6 28:12,15,19 30:1 31:11 34:6,19 36:4 images 13:12 13:16 included 45:14 46:3 including 18:25 industry 9:11 12:12 initial 33:23 35:10,13,16,17 initially 35:4,4 inside 13:8 install 13:2 instance 1:18 instructed 5:12 instrument 41:15 intended 28:10 intent 22:23 23:1 27:11,17 36:25	introduce 6:8 inventor 16:18 investments 16:14 involved 9:16 18:24 ipr 6:19 18:15 ipr2024-00595 1:4 42:4 issue 5:10 issues 12:7 30:16 it'll 10:9 11:13 40:2	kevin 19:9 kind 12:11 35:20,20 knew 17:1,2 know 5:23 9:1 10:13,18,20 11:1,10,17 12:8,9,24 14:19,23,24 15:1,2,4,5,8,24 16:1 17:10,11 25:17 29:19 30:13,16 32:12 37:17 39:2 knowledge 14:17,18 known 9:10 41:11
		j	l
		james 14:23 15:19 january 17:16 joining 7:5	l 1:18 42:12 44:12
		k	labeled 21:24 lai 2:10 4:10 7:4 lamar 4:19 land 34:10,12 laterally 30:22 31:7 lawyer 18:1,4
		karam 19:13 karen 1:18 42:12 44:12 karimpour 16:19 keener 19:9 31:23 32:2,6,9 32:14	

[leases - nature]

leases 16:5 leave 31:1 lecroy 1:11 3:4 3:11,18 4:12 4:16,19 6:2,10 6:14,15,23 7:16,19 10:11 12:13 18:9,13 20:2,14 21:2 25:20 31:17 37:15,17 39:22 41:1,7,11 42:10,15 45:5 47:2,24 left 30:22 legal 45:7 legs 27:23 level 38:2,11 lifted 38:6 39:6 lifting 38:1 likewise 8:4 limit 31:6 lina 19:13 lincoln 10:16 11:14,21 12:3 12:14,23 line 17:21 45:15 46:4 47:4,7,10,13,16 47:19 lines 10:25 linkedin 14:14 list 19:2 listed 14:2	lists 7:20 litigation 20:6 little 9:25 10:11 13:3 33:15 llc 1:4 42:4 llp 2:11 locked 45:12 46:1 long 8:14 39:15 longer 36:6 longview 1:20 look 21:16 lot 9:18 10:12 lower 38:11	marked 3:13 6:10 18:8 20:12 31:16 matt 9:23 39:16 matter 17:18 matthew 2:4 4:5 matthewrobson 2:7 mcclellan 2:11 mcclelland 4:8 mean 24:22 25:8 38:19 means 25:24 39:3 meant 35:17 meet 8:11,14 meeting 7:15 mentioned 10:12 14:10 15:19 met 8:16,18 mind 4:17 minor 12:8 minute 9:24 40:1 minutes 39:17 40:3 misunderstan... 25:21 modifications 12:9 modifying 13:20	moment 6:9 10:3,7 morning 4:16 motion 28:8 move 23:22 24:1,3,3,8,14 24:18,22 25:3 25:11,15,18 26:3,14,15,19 26:21 27:2,15 27:17 28:22 31:7 moved 16:10 movement 23:13,18 moves 28:9 moving 23:11 27:16,16,18 28:23 29:1,6 29:12,15,20,23 30:12 35:2,9 35:13,20,25 36:5 37:21,25 38:17,23
	m		
	m 2:1,10 4:14 machine 13:5 13:16 machinery 12:20 maier 2:11 4:8 maintain 35:16 majority 10:23 make 5:6 7:17 21:11 36:11 45:14 46:3 makes 5:7 management 16:12 managing 16:12 manual 13:2,6 13:8 manually 13:21 32:21		
			n
			n 2:1 3:1 4:1,14 4:14 name 4:17 17:3 41:14 named 1:17 nature 10:21 11:11 12:1,11 16:3 28:24 38:19

[nearly - performed]

<p>nearly 21:21</p> <p>necessary 45:14 46:3</p> <p>need 5:2,22</p> <p>needs 23:6</p> <p>neither 44:3</p> <p>neustadt 2:11 4:8</p> <p>never 11:8 13:19 19:8,12 19:24</p> <p>new 2:6,6</p> <p>ninth 2:5</p> <p>noisy 9:25</p> <p>notary 41:22</p> <p>notating 45:15 46:4</p> <p>noted 41:3</p> <p>notice 3:11 6:15</p> <p>noticing 4:4</p> <p>notifications 14:15</p> <p>number 6:12 6:19 45:15 46:4</p> <p>nutshell 19:19</p>	<p>objections 5:11</p> <p>oblon 2:11 4:8</p> <p>oblon.com 2:13 2:13 45:2</p> <p>obviously 36:25</p> <p>occasionally 15:6</p> <p>offered 24:10</p> <p>offering 11:17</p> <p>office 1:1 4:10 9:5 19:20 41:18 42:1 45:11</p> <p>officer 42:16</p> <p>oh 10:2</p> <p>okay 4:23 5:4,5 5:8,9,15,18,19 5:25 6:1,5 7:1 7:4,4,13,22 8:1 8:14,21 9:7,9 9:12 10:6,10 11:1,8,25 12:19 13:3,9 14:13,16,22 16:1 20:2,19 21:2,18 23:9 24:6 25:10,20 25:25 26:1,2 27:4 29:3,7 31:14 33:24 34:14,18,23 35:24 36:13 37:4 38:22 39:1,5,13,18</p>	<p>40:5</p> <p>ollis 2:10 4:7,7 7:3,6 9:23 10:7 13:23 18:11 23:5,23 24:20 25:5 26:6,18 33:21 37:8 39:10,15,18,25 40:7 45:1</p> <p>ones 9:7 12:17</p> <p>ooo 40:11</p> <p>open 7:14 21:20 22:1,6 23:2,4,7</p> <p>operate 28:10</p> <p>operation 28:2 28:12</p> <p>operations 12:15</p> <p>oral 1:10,16 42:10,17</p> <p>order 13:12</p> <p>original 38:2 45:10,20,22</p> <p>outcome 44:6</p> <p>outside 9:24</p> <p>ovo 16:4</p> <p>own 27:22,22</p> <p>owner 1:8,18 2:3 4:6 8:2,5 19:9,13 42:8</p>	<p>32:18,19 45:15 46:4 47:4,7,10 47:13,16,19</p> <p>pages 45:14,17 45:17 46:3,6,6</p> <p>paper 3:14 6:12 6:22 7:18 18:9 37:12</p> <p>papers 7:8</p> <p>paragraph 18:22,22 21:16 37:16,19</p> <p>part 24:15</p> <p>particular 25:24</p> <p>parties 44:5</p> <p>party 42:22 44:2</p> <p>past 15:7 30:25</p> <p>patent 1:1,2,5,8 1:18 2:3 3:16 3:18 4:6 8:1,5 9:5 16:19 19:9 19:13,17,20,22 19:25 20:5 42:1,2,5,8</p> <p>pdf 45:12 46:1</p> <p>penalty 45:16 46:5</p> <p>pending 5:25</p> <p>people 17:5</p> <p>perform 12:15 12:16 28:2</p> <p>performed 28:13</p>
o			
<p>o 2:1 4:1,14</p> <p>oath 6:3 41:12</p> <p>objection 13:23 23:5,23 24:20 25:5 26:6,18 33:21 37:8 39:10</p>		<p>p</p> <p>p 2:1,1 4:1</p> <p>page 3:2,10 18:17,17,20</p>	

[performs - question]

performs 13:21 13:22 period 45:18 46:7 perjury 45:17 46:6 person 41:14 personally 12:19 13:15,20 14:19 41:11 personnel 12:10 petitioner 4:8 petitioners 1:5 2:9 3:18 7:20 7:23 9:5 17:14 17:20 42:5 pfizer 16:6 phase 35:20 phone 8:19 pilgrim's 10:16 11:10,12,21 12:2,14,23,24 12:25 13:2 place 23:25 24:5 26:23,25 27:10 placed 32:21 33:1,5 plate 32:21 33:2,5,5,7,11 33:14,19 34:2 34:10,12,13,16 34:20,25 35:1 35:8,13,25	36:5,9,12,13,18 37:1,23,25 38:5,6,9,14,17 38:18,23 39:6 plate's 36:14 plates 37:21 platform 30:22 31:1 38:1 plc 12:10 please 4:3,25 5:3,16 point 5:15,22 8:11 21:5,9,20 25:14 26:16 27:13 33:4 34:9,15 35:1 35:24 36:13 pole 21:23 31:12 poles 22:1,8,14 22:19,22,24 23:10,14,15,17 25:15 30:6,8 31:5,12 position 14:24 15:1 31:10 38:7 poultry 9:11,18 9:20 10:12,14 10:17 11:22 12:12 14:1,8 16:5 premium 10:17 11:14	prepare 8:8,12 8:15,18,21,23 preparing 9:2 present 2:10 30:19 31:13 presented 28:15 prevent 23:10 29:20 30:21 previously 3:13 printouts 7:9 prior 14:11 16:17 20:6 probably 8:16 9:3 18:9 procedure 45:19,21 proceeding 6:13 9:5 16:18 17:24 18:8,15 18:24 19:6 20:6,12 process 21:10 32:25 processes 13:11 processing 10:24 13:22 producers 16:5 programming 12:10,11 project 31:15 proper 31:10 properly 28:1 propped 25:8 28:8	prosecution 19:16,25 proved 41:12 provided 15:17 31:23 32:2,8 32:13 45:19 46:8 provisions 1:22 public 41:22 publication 3:16 publications 14:14 pull 18:7 37:12 37:13 39:2 purpose 22:8 31:9 36:17,22 37:2,6 purposes 21:3 41:17 pursuant 1:21 push 37:22 38:17 pushed 32:22 33:7 38:9 put 7:17,18 29:2 putting 30:6
q			
qualify 26:4 question 5:18 7:17 11:14 13:3 14:5 18:13 21:17 24:9 25:21			

[question - running]

<p>26:2 31:4,16 33:25 questioning 20:21 questions 5:1 5:11,16,24 6:6 7:23 39:22 40:7 quinn 2:4 4:6 quinnemanue... 2:7</p>	<p>recite 7:1 recognize 20:14 record 1:22 4:3 4:18 6:11 19:19 42:17 refer 7:23 8:5 20:18,21 reference 20:19 20:22,24 21:15 31:20 32:14 39:8 referenced 45:6 referring 7:24 regards 10:18 related 4:9 44:4 relationship 9:16 10:21 11:11 12:2 relationships 14:3 released 45:22 remote 1:10,16 42:10 remotely 6:24 7:5 repeat 24:9 reply 3:18 report 7:10 31:18 reporter 4:2,11 5:8 42:13 reporter's 42:10</p>	<p>requested 42:21 44:1 46:1,9,10 required 5:12 45:20 respect 11:10 restrained 23:24 24:2,4 24:23 25:9,19 26:8,8,10,16,20 26:22,24 27:1 27:3 restraining 24:23 restricted 23:15,19 retained 17:13 return 45:17 46:6 returned 42:23 42:24 review 19:5 45:8,10,13 46:2 reviewed 18:23 19:8,12,24 20:15 21:2 31:17 ride 29:19 right 6:24 7:14 13:13 14:11 19:3,10,14,25 20:8 21:3,6,21 21:24 22:2,6 22:10,12,15</p>	<p>23:4,9,11,15,19 25:12 26:22 27:1,19 28:13 29:24 30:2,7 30:22,22 31:20 31:21,24 32:3 32:10,15,17 33:2,5,9,12,16 33:18,20 34:1 34:11,14,16,19 34:21 35:1,3,7 35:9,12 36:1,6 36:8,10,15,19 36:21,23 37:14 38:7,24 robot 12:10 15:12,13 robson 2:4 3:5 4:5,5,15 6:11 10:6,10 39:13 39:17,19,21 40:5 roles 13:1 room 7:2,5 9:25 rotate 20:25 rules 4:24 46:8 run 27:8,13,23 28:7,19,22 29:10,12,16 30:1,4,6,15 running 29:21 30:9,10,13,18 30:21</p>
<p>r</p>			
<p>r 2:1,1 4:1 47:3 47:3 r&s 46:1,9 raise 37:25 38:18 ramin 16:19,20 16:22,23 rate 33:15,20 34:3 36:1 rdr 1:19 44:12 read 41:1 reading 39:7 45:24 46:9 really 38:9,10 38:15 reason 6:5 47:6 47:9,12,15,18 47:21 reasons 42:25 recall 17:3,13 receipt 42:23 recess 39:20 40:6</p>			

[runs - strike]

runs 27:25 28:11	services 11:2 serving 17:18 several 9:10 18:23 sexing 11:2,5 11:18 12:15,17 12:20,25 13:2 13:5,8,11,12,16 13:21,22 28:2 28:12,20 shake 5:2 shawn 1:11 3:4 3:18 4:12,19 6:15 41:1,7,11 42:10,15 45:5 47:2,24 shelton 1:19 42:12 44:12 shock 32:23 36:9,14,17,18 36:22 37:2,6 38:20 short 39:13,14 shorthand 42:12 shortly 10:1 shoulders 21:21 show 39:3 shown 22:13 shows 21:5,8 21:19 39:1 side 16:11,13 30:14,15,17 40:4	sign 45:16 46:5 signature 18:18 41:2 42:19 44:12 45:22,24 45:24 46:9 site 15:12 situation 29:5,9 29:14 35:5 situations 29:18 six 40:3 slows 34:13 solution 11:18 solutions 45:7 sorry 9:22 10:8 20:20 21:7 23:16,16 27:24 31:2,25 sort 14:15 speak 5:6 8:22 28:3 speaking 8:5,22 25:23 specifically 27:5 spent 9:2 spray 10:24 11:13,15,15 15:2,13,16 spring 37:24 38:20 springs 37:22 38:17 stand 28:24	start 35:18,21 started 16:9 starting 4:17 10:20 38:6 starts 10:3 state 1:19 4:3 33:18 34:1,18 34:24 35:12 36:21 37:5,9 38:23 41:8,23 42:13 45:9,12 stated 1:22 statements 37:23 states 1:1 11:19 33:22 35:10 42:1 stating 4:17 stationary 33:5 stay 10:9 29:2 29:23 step 10:3 32:25 steve 14:23 15:8 17:19,21 stipulation 45:21 stop 10:9 29:22 35:21 36:15 37:1 stopped 10:2,8 stops 28:4,6 34:13 street 2:11 strike 14:4 25:1 26:12 27:6
s			
s 2:1 3:9 4:1 47:3 s.a. 1:3 42:3 s.a.s. 1:4 42:4 sa 45:4 47:1 sante 1:3 42:3 45:4 47:1 saying 17:7 25:14 says 7:19 8:1 32:20 37:20 38:14,16 scenarios 15:15 schedule 17:15 45:10 screen 7:14 37:14 seal 41:18 sealed 45:20 section 1:21 see 6:14 7:4,19 8:1 10:2,4,24 18:22,25 21:1 21:18 32:19,23 37:19 38:2 40:3 seen 11:3,8 sentence 32:20 served 20:2 service 12:4,6 16:9,10,12			

[strike - understanding]

29:4 31:3,3 35:6 39:4,4 submitted 6:18 18:14 19:9,13 subscribed 41:15 suggest 37:23 suit 14:11 16:19 sullivan 2:4 support 3:18 22:5 23:1,7 supporting 22:3 38:1 sure 5:6 10:6 surely 28:11 sworn 4:11,13 42:16 system 11:4,6,8 13:21 22:24 23:3,6 27:12 27:23 28:1,5,9 28:18,20,21 29:25 30:5 39:1	taken 1:17 4:21 21:6,9,12 28:12,16,19 30:1 31:11 34:7 36:4 talking 17:5 25:24 targan 1:7 4:6 8:2,6 9:8 14:11 14:13,17 42:7 45:4 47:1 technical 16:10 technician 16:10 technicians 16:12 technologies 1:4 42:4 tell 7:13 9:20 17:23 ten 39:17 tendency 5:2 territory 16:11 testified 4:13 testimony 5:8 22:18 42:17 texas 1:20,20 42:13 thank 7:13,16 39:22,24 therefor 42:25 thing 5:23 11:15 14:15 16:2	things 37:2 think 15:19 17:15 22:23 25:6,13,13 28:18 35:7 three 7:20,24 9:3 time 5:10,10 8:17 17:22 20:11 39:23 45:10,18,25 46:7 times 10:16,18 title 15:24 titled 6:14 today 5:15 6:3 6:6,18 7:23 8:9 told 17:25 total 8:17 totally 26:7,8 26:11 trademark 1:1 42:1 trades 15:14 training 12:10 transcript 5:3 42:16,24 45:6 45:8,10,13,13 45:22 46:2,2 trial 1:2 42:2 troubleshooti... 12:7 true 27:25 34:14,25 41:3 42:17	truthfully 6:6 try 5:21 29:1 tuck 25:16 turn 18:20 20:24 31:15 32:17 37:11 turning 27:4,4 27:7 two 37:2 tx 44:13 typical 29:22 typically 29:1 tyson 10:15,20 11:1,21 12:2 12:14,23
t			u
t 2:1 3:9 4:14 47:3,3 take 5:8,20,24 6:22 9:24 12:23 19:24 20:10 24:6 28:6 31:14 34:19 39:13,16 39:25			u.s. 1:5 3:16,18 42:5 uh 29:8 unable 25:2,11 26:3 under 6:3 21:23 22:14,24 23:10,14,17 30:6 31:5 33:12 41:12,18 underneath 22:19 understand 5:13,16 6:2 13:9 18:24 19:22 20:22 24:10,11 38:8 understanding 6:17 7:22 8:4

[understanding - zoom]

39:9 understood 5:18 35:21 united 1:1 11:19 42:1 unrestrained 23:21 24:7,11 24:13,16,19 25:3,12,25 26:4 upright 21:1 upwards 39:6 urquhart 2:4 use 13:12 38:20 uses 11:1	w waived 45:24 45:24 waiving 45:21 wall 30:17 walls 30:14 want 37:12 39:2 way 10:9 22:5 30:5 32:12 38:8,11,16 we've 31:22 weight 33:16 went 15:12 16:11 32:1 window 7:15 windows 7:14 wing 21:23 24:22 26:19 wings 22:1,4,6 22:9,14,14,17 22:19,20,25,25 23:2,4,6,8,10 23:11,13,18,18 23:22 24:3,8 24:14,18,24 25:3,7,11,14,16 25:18,18 26:3 26:8,9,13,15,22 26:25 27:2 28:5,8 30:7,19 31:13 witness 1:17,20 2:10 4:11 6:12 20:3 39:24	42:15,18 45:13 45:16 46:2,5 work 9:12 12:4 12:6 13:10 15:16 16:17 23:3 28:17 worked 12:19 13:4,15 15:7 16:2,7,23 working 15:13 works 14:19 39:14,19
v		x
v 45:4 47:1 vaccination 16:4 vaccine 9:11 10:25 11:13,15 15:2 vacuuming 9:24 verbal 5:1,4 veritext 45:7,9 45:11,20 viable 28:20 view 24:25 25:2 25:10 26:2 27:5 virginia 2:12 volition 27:22 vs 1:6 42:6		x 3:1,9 4:14 42:21 46:1
		y
		yakov 3:14 yavnai 20:19 20:22 21:17 22:23 25:23 27:12 29:24 30:5 yeah 11:15,16 12:18,24 15:23 18:6 21:18 year 17:16 years 9:10 york 2:6,6
		z
		zoetis 16:6,24 17:4 zoom 7:15

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.