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

)
CHAMPION LABORATORIES, INC.,)
FIRST BRANDS GROUP, LLC,)
)
Petitioners,)
) U.S. Patent No. 9,023,203
vs.) IPR2024-00603
)
HENGST SE,)
)
Patent Owner.)
_____)

REMOTE DEPOSITION OF MEHDI BASIRAT, Ph.D.
Friday, March 14, 2025
Volume I

Reported by:
NADIA NEWHART
CSR No. 8714
Job No. 7241329
PAGES 1 - 89

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
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6 FIRST BRANDS GROUP, LLC,)
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Petitioners,)

vs.)

HENGST SE,)

Patent Owner.)

U.S. Patent No. 9,023,203

IPR2024-00603

Remote deposition of MEHDI BASIRAT, Ph.D.,
Volume I, taken on behalf of Petitioners, with all
participants appearing remotely via videoconference and
the witness testifying from Los Angeles, California,
beginning at 10:00 a.m. and ending at 1:01 p.m. on
Friday, March 14, 2025, before NADIA NEWHART, Certified
Shorthand Reporter No. 8714.

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PREVIOUSLY MARKED EXHIBITS

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1 Friday, March 14, 2025

2 10:00 a.m.

3
4 THE REPORTER: This is Nadia Newhart,
5 Certified Shorthand Reporter, license number 8714.

6 Please raise your right hand, Doctor, and I
7 will swear you in.

8 Do you solemnly swear or affirm that the
9 testimony you're about to give in this deposition will
10 be the truth, the whole truth and nothing but the truth
11 under the penalty of perjury?

12 THE WITNESS: I do.

13
14 MEHDI BASIRAT, Ph.D.,
15 having been first duly sworn, was examined and
16 testified as follows:

17
18 EXAMINATION

19 BY MR. LU:

20 Q Good morning, Dr. Basirat. Is that how you
21 pronounce your name?

22 A Yes. That's perfect, actually.

23 Q Okay. Thank you. Could you say and spell
24 your name for the record.

25 A My name is Mehdi Basirat. It's M-e-h-d-i.

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1 The last name is Basirat, B-a-s-i-r-a-t.

2 Q Okay. Thank you. Dr. Basirat, have you ever
3 been deposed before?

4 A Yes, I did.

5 Q How many times -- or let me ask you this.
6 When was the last time you were deposed?

7 A Oh, about eight months ago.

8 Q And over the past, let's say, five years, how
9 many times have you been deposed?

10 A Once or twice probably.

11 Q Okay. So, yeah, you've done this before, but
12 I'll just go over a couple of ground rules. I'm going
13 to be asking you questions, and unless your counsel,
14 Mr. Burnham, instructs you not to answer, you should
15 answer them.

16 In order that we can have a clean transcript
17 and to help the court reporter, I ask that you let me
18 finish my questions, and I will try to, you know, let
19 you finish your answers before proceeding with the
20 question.

21 And since, you know, we're doing this over
22 Zoom, it would probably help if you could enunciate and
23 speak, you know, at a normal pace. You know, we
24 have -- you know, audio quality is not always great
25 over these virtual depositions.

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1 So for the sake the court reporter so she can
2 properly transcribe what you say, if you could, you
3 know, speak at a measured pace and clearly and at a
4 reasonable volume.

5 A Got it.

6 Q Okay. Thank you. So, Dr. Basirat, did you do
7 anything to prepare for this deposition today?

8 A Well, I reviewed their report, the petition,
9 and I also had a meeting with Mr. Burnham and
10 Mr. Smith.

11 Q And when was this meeting?

12 A It was on Monday.

13 Q How long was the meeting?

14 A About 1 hour, 1 hour and 20 minutes probably.

15 Q Did you meet with counsel at any other times
16 to prepare for this deposition?

17 A One more time. It was last week on --
18 probably last Wednesday, I think. I do not have the
19 date exactly.

20 Q That's okay. Do you remember how long you met
21 with counsel?

22 A One hour.

23 Q One hour?

24 A Yeah.

25 Q And was it also Mr. Burnham and Mr. Smith?

1 A Yes.

2 Q And so you said you reviewed your declaration;
3 is that correct?

4 A Yes, I reviewed my testimony.

5 Q And you're referring to Exhibit 2017, which
6 was submitted with patent owner's response; is that
7 correct?

8 A That's correct.

9 Q So you said you reviewed your declaration and
10 the petition. Did you review any other documents in
11 preparation for this deposition?

12 A I had them opened, but I didn't really go
13 through them because I didn't -- I mean, I didn't need
14 to, but I had them in front of me.

15 Q Okay. Did you see the patents?

16 A Well, if you look into my testimony, there is
17 a list of items that I reviewed, or the documents. So
18 I had them available, but I didn't go through them this
19 time.

20 Q Okay. So you mean you did review the exhibits
21 at least listed in your declaration -- in preparation
22 of your declaration, but you did not do a further
23 review in preparation for this deposition; is that
24 right?

25 A Yes, that's correct.

1 Q Okay. Now, Mr. Basirat -- or sorry, excuse
2 me, Dr. Basirat, could you briefly go over your
3 education history.

4 A Sure. Well, I have done my undergrad back in
5 Iran in mechanical engineering in 2002. Then I was
6 working in the industry for almost six years. And then
7 I moved to Sweden after I earned my master degree there
8 between 2008 to 2010. And then I came to United States
9 in 2010, started my Ph.D. here, and I finished with my
10 work in education, like late 2013 and started working
11 for Caterpillar after that. And --

12 Q Now -- I'm sorry. Go ahead.

13 A So, yeah, that's it for my education, all in
14 mechanical engineering.

15 Q I see. And then you said you started working
16 for Caterpillar; is that right?

17 A Yes.

18 Q And your Ph.D., was that at the University
19 of Idaho?

20 A Yes.

21 Q And your mechanical -- or excuse me, your
22 master's degree, which university or school was that at?

23 A It was at KTH -- KTH. It's Royal Institute of
24 Technology in Stockholm.

25 Q Stockholm, Sweden?

1 A Yes.

2 THE REPORTER: Can you repeat the name of the
3 school again, please.

4 THE WITNESS: It's Royal Institute of
5 Technology.

6 THE REPORTER: Thank you.

7 THE WITNESS: The Swedish name is KTH.
8 It's...

9 THE REPORTER: Can you spell that, please.
10 I'm sorry. If you can repeat.

11 MR. LU: No, that's all right.

12 BY MR. LU:

13 Q Let me ask you this, Dr. Basirat. So your
14 bachelor's degree, that was in Iran?

15 A Yes, from Persian Gulf University.

16 Q Okay. And then upon receiving your
17 bachelor's, you said you worked in industry; is that
18 correct?

19 A Yeah. And I was working during my undergrad
20 as well.

21 Q Okay. So let's start with this.

22 Where did you work when you were working
23 during your undergrad?

24 A I was working designing, like, some
25 machineries for a composite manufacturing company.

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1 Q Was this in Iran? The company was --

2 A Yeah.

3 Q -- an Iranian company?

4 A Yes.

5 Q Sorry. So let me finish my questions before
6 you answer.

7 A Sure.

8 Q So let me just repeat that back so we have a
9 clean record.

10 And this was an Iranian company; is that
11 correct?

12 A Yes.

13 Q And what was the nature of your work?

14 A I designed two machineries for them, basically
15 for the -- the winding composite. Basically, the --
16 it's for -- for like composite treatments, like elbows
17 and also 45-degree and 90-degree elbows then made of --
18 it was carbon fiber reinforced composite. And then I
19 designed a few curing post -- actually post-heat
20 treatment ovens for them.

21 Q So I believe you said it was carbon fiber?

22 A Yes.

23 Q And so these elbows that you made, what --
24 were they components for some other kind of machine?

25 A No. It's like -- it was for the smaller,

Page 11

1 like, composite tubes that you can use for, basically,
2 seawater, or like -- mostly, or sometimes even for the
3 drinking water appliance. So I designed it for the
4 company that was manufacturing them.

5 Q Okay. So they were elbows for pipelines; is
6 that right?

7 A Yeah.

8 Q I see. Okay. And what years were you working
9 at this company?

10 A It was 2001, 2002. So 20 years ago.

11 Q And I'm not sure if you said this already, but
12 what was the name of the company?

13 A The name of the company was Farasan,
14 F-a-r-a-s-a-n. I worked for them, like, as a
15 contractor. So it's basically the project and
16 designing. I was not their direct employee in that
17 sense.

18 Q I see. And then after that, what was your
19 next job?

20 A I worked in different fields. I -- so let me
21 start going through my work background. That would
22 be -- I think it's easier.

23 Q Okay.

24 A I was always into, like, machines and cars
25 and, like, designing components. So that's why during

1 my high school, I was working for a few shops in like
2 -- just as a training. And then working on the cars, I
3 always fixed my car myself, because -- I mean, the car
4 I had was around '05, those types of old naturally
5 aspirated engines, pretty easy to put together and
6 assemble.

7 And I worked for -- after graduation, I worked
8 for different companies as a building inspector. I
9 worked for -- as a mechanical engineer. I designed the
10 seawater intake for my work, a mechanical company in
11 south of Iran. Basically, the heat extender system had
12 to cool down using seawater, so I led the design of
13 that --

14 Q So let me --

15 A -- so --

16 Q Excuse me, sir.

17 A Go ahead.

18 Q Yeah. I think the court reporter is having a
19 little trouble hearing you. So why don't we do this.
20 I ask you a question and then you respond.

21 A Let me put on my headset.

22 (Pause in the proceedings.)

23 BY MR. LU:

24 Q Just to make this easier, how about I just ask
25 you --

1 A Sure.

2 Q -- specific questions, and then you can
3 respond. If I need to clarify anything, I can ask.

4 A Okay.

5 Q It will be easier that way.

6 Okay. So you said after graduation, you
7 worked for different companies as a contractor; is that
8 correct, or --

9 A As -- some of them I was full time. Like I
10 worked for Anedco, full-time employee. I started as a
11 mechanical engineer and then lead mechanical engineer,
12 oversight of whole department. That was a consulting
13 company that we were designing these -- basically, one
14 project was the seawater intake that I was talking
15 about.

16 Q Okay. And so that's --

17 A Uh-huh.

18 Q I'm sorry. That's Anedco, A-n-e-d-c-o?

19 A Yes, that's correct. I worked for another
20 company called Paysaz. It was a Persian
21 (indiscernible) storage tank manufacturer.

22 THE REPORTER: It was a what?

23 THE WITNESS: It's a P-a-y-s-a-z. I mean,
24 it's -- those are, like, many years ago. So it's hard
25 to remember all the details if you wanted to go through

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1 that. That's really 20 -- between 22 to 16 years
2 ago -- or 18 years ago, yeah.

3 BY MR. LU:

4 Q And then what was the nature of your work at
5 Paysaz?

6 A I worked as a design engineer. So basically
7 like designing the storage tanks and pressure vessel.
8 And at Anedco, we designed -- I was talking about this
9 project to see whether intake -- that was quite a large
10 project.

11 I designed the filtration system for the
12 seawater intake, because you need to remove most of the
13 debris from that. I designed the return system as well
14 to maintain the minimum pressure on the heat extenders
15 not to get into the vacuum. So, yeah, that's it,
16 basically.

17 Q So you said you redesigned the return system?

18 A Yeah. So the way the system works is you
19 basically have these floating pump stations on the sea
20 level, right? And then you suck the -- or you pump the
21 water from the sea, go to some level of filtration,
22 not -- like, it's not for drinking water filtration.

23 And then you send it to the petrochemical
24 complex for the heat exchangers, to cool down the --
25 some of the processed liquids, or the -- I mean, just

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1 providing -- removing heat from the system, and then it
2 goes back to the ocean. But then to go back to the
3 ocean, you need to design the system to avoid the --
4 it's like if you get a sudden abrupt in the power,
5 right, then the whole system will get into suction,
6 right?

7 And that actually destroys the heat extenders,
8 so you need to design specific equipments in the
9 outlet, in the water outlet system to avoid that. So
10 one of the stuff that I've done with that, it's
11 basically very large water containers. And then the
12 specific flow from top of it, which after that goes to
13 the -- it gets back to the ocean or sea.

14 Q Okay. How long did you work at Anedco?

15 A I think it was around four years, about three,
16 four years.

17 Q I'm sorry. When years were they?

18 A I left Anedco in 2008 -- in July or August in
19 2008. I do not remember exactly. 2005 -- maybe '05 or
20 '04, I started there, and --

21 Q Okay. And then --

22 A I don't remember exactly.

23 Q That's fine.

24 And before Anedco, you said you were working
25 Paysaz?

1 A Yeah. I worked for Paysaz for a short time.
2 And then I helped them later on as contractor.

3 Q So at Paysaz, you said you designed storage
4 vessels; is that correct?

5 A Pressure vessel, storage tank.

6 Q What's a pressure vessel?

7 A Pressure vessel is like -- basically, in any
8 chemical plants or in any oil and gas system, you need
9 to either provide increased pressure, or you need to
10 have, like, temperature or both together. And to
11 design those, it's a quite complicated process to make
12 it work.

13 Q Okay. And so these were pressure vessels and
14 storage tanks for the oil and gas industry?

15 A Most of it, yeah. Oil and gas. And the --
16 (Simultaneous speaking - unreportable.)

17 BY MR. LU:

18 Q Go ahead.

19 A No, you go ahead.

20 Q So these were used in oil and gas refineries
21 or -- like, where were they used?

22 A Yeah, refineries or in the -- in some
23 petrochemical companies --

24 Q Okay. I see.

25 A -- for storing the diesel.

1 Q And then after Anedco, what job did you have?

2 A I went to Sweden to start my master's degree.
3 I was there from end of August, September, 2008 until
4 March 2010. I was the first one who graduated from the
5 program, and --

6 Q Did you --

7 A Huh?

8 Q Did you have any jobs while you were studying
9 in Sweden?

10 A No, no.

11 Q Okay. And then after you graduated, you went
12 to the University of Idaho; is that correct?

13 A Yes. I got this admission and, basically,
14 this fully funded Ph.D. position from University
15 of Idaho, and it was funded by the Department of
16 Energy. So I moved to Idaho. I've done my Ph.D. there
17 and started working.

18 Q Did you do any work while you were at the
19 University of Idaho?

20 A No. As an international student, I could work
21 as a research assistant for limited -- like -- and it's
22 a full-time job, basically, doing Ph.D., not for the
23 industry.

24 Q And did you have a research engineer position
25 at the university?

1 A Yeah. That's how they pay you, as the
2 research...

3 Q I see. And what sort of research were you
4 doing?

5 A I was working for, like, validating or
6 developing the steel material and material model for
7 the nicromium steel that I think now it's -- they're
8 using it in the next generation of nuclear reactors.
9 And, basically, it was a combination of simulation and
10 physical testing.

11 I had -- our research team, we were five; my
12 advisor and the co-advisor and another co-PI and me and
13 another Ph.D. student. The other Ph.D. student was
14 doing mostly the testing, and I did most of the
15 simulations.

16 And I developed new material model for the
17 formation of nicromium steel. I published several
18 papers on that. Some of them has been cited, I think,
19 more than 300 times.

20 Q And was that the scope of your Ph.D. thesis?

21 A Yeah, basically, developing -- so it's -- when
22 you are dealing with high temperature and high
23 pressure, like, situations, like nuclear reactors,
24 that's the ultimate. You will have these non-linear
25 formations over time that can cause, like, crack

1 initiation in the reactor or in the pipelines that are
2 going into the reactors.

3 So I developed this model to be able to
4 simulate this material behavior during this project.
5 It's like for the creep deformations --

6 THE REPORTER: For the what? Sorry.

7 THE WITNESS: Creep. It's like, creepy,
8 creep.

9 THE REPORTER: Creep. Got it.

10 THE WITNESS: It actually -- the term we are
11 using for nonlinear plastic or viscoplastic deformation
12 of materials.

13 THE REPORTER: Sorry, when I ask you to
14 repeat, I need you to repeat exactly what you said.

15 THE WITNESS: I said "creep," c-r-e-e-p.

16 THE REPORTER: Thank you. And continue from
17 "creep."

18 THE WITNESS: Deformations of materials. In
19 this case, it was P91 or nicromium stainless steel.

20 BY MR. LU:

21 Q And you said that you were -- this position
22 was funded by the Department of Energy; is that right?

23 A It was funded by Department of Energy and the
24 NEUP. It's next -- I do not remember what was exactly
25 the NEUP stand for. I have to check it.

1 Q And so am I understanding correctly that the
2 program that you entered was specifically for
3 researching these nuclear reactor-related engineering
4 materials?

5 A Yeah.

6 Q Okay. And that's why the Department of Energy
7 was involved; is that correct?

8 A Yeah. It was partially funded. Like the
9 largest U.S. national lab working on nuclear materials
10 is in Idaho, Idaho National Lab, and they had some
11 collaboration with the University of Idaho and
12 Department of Energy. So one reason that the
13 project -- my advisor got the project, so...

14 Q I see. So is this a position that you applied
15 for?

16 A I had an email exchange with my supervisor,
17 because I liked this -- the field that he was working.
18 I sent him an email back in 2008. 2009 he got back to
19 me, and he said, "I have this Ph.D. position. Do you
20 want to start?"

21 And I said, "Yes," but I think it took me -- I
22 think -- actually, I think it took about seven months
23 to get the visa to come to U.S. And then I started. I
24 started -- at the time, it was in May, but yeah, I'm
25 happy I got the admission.

1 Q Yeah, I can imagine. So you said you had an
2 email exchange with your supervisor.

3 Is that your supervisor at the KTH --

4 A At the University of Idaho. It's a professor
5 who gave me the opportunity.

6 Q How had you met him before?

7 A I just emailed him.

8 Q I see. So you had an email exchange with
9 somebody at the University of Idaho, and they invited
10 you?

11 A They had, like, a phone interview. And he
12 said -- at that time, he said, "I don't have an
13 immediate position. If I have, I'll get back to you."

14 And I think it took him about a year to get
15 back to me.

16 Q And what was the nature of your studies at KTH
17 when you were doing your master's?

18 A I have done my master's in engineering
19 mechanics, so mechanical engineering. So it's mostly
20 mechanical design, simulations, analysis. I think I
21 had maybe more than 12 different courses, and I had --
22 I had a dissertation as well, so I had a written
23 thesis.

24 Q What was the subject matter of your
25 dissertation?

1 A It was for the fatigue analysis of --
2 basically, my supervisor came up with a new specimen
3 design for testing materials for the -- he had this
4 project, Scania. It's S-c-a-n-i-a. It's the second
5 largest Swedish truck manufacturer that is based in
6 Stockholm.

7 And he started working on this test specimen
8 to be able to simulate the fatigue of, like, a
9 crankshaft for the trucks, right? But then the regular
10 testing, it doesn't -- you cannot replicate the whole
11 effect of the different loadings. So he came up with
12 this new design for this specimen, and we studied the
13 effect of the size and the load directions on the
14 specimen -- on this material -- or on this specimen for
15 reducing number of tests, if that makes sense.

16 Q I think I get it. All right. So going back
17 to your time at the University of Idaho, what year did
18 you complete your Ph.D.?

19 A I completed my coursework and everything in
20 2013. Then toward later -- later than like -- later in
21 the year, I've got my job offer from Caterpillar, so I
22 left. I started my work at Caterpillar, and then came
23 back and defended my Ph.D.

24 Q I understand. And what was the nature of your
25 work at Caterpillar?

1 A I worked at the aftertreatment department of
2 Caterpillar. Basically, we designed -- the department
3 was responsible for designing this filtration system at
4 the exhaust -- after the exhaust of the engines. It's
5 basically for large trucks, locomotives, and marine
6 engines. It's --

7 THE REPORTER: A what engine?

8 THE WITNESS: A marine engine. Like, for the
9 ships --

10 THE REPORTER: Marine? Got it, yeah.

11 THE WITNESS: It's -- so you basically have
12 these large units at the -- after the exhaust of the
13 engine. And you spray some chemicals, and it goes
14 through some filtrations.

15 So you reduce the NOx -- yeah, the NOx and the
16 other emissions from the exhaust engine. And it worked
17 with different components. I helped with the design
18 and also validations of these components, or I worked
19 on a component and also the system, so...

20 Q Okay. And then how long did you work at
21 Caterpillar?

22 A About one year.

23 Q One year? Is that what you said?

24 A Yes.

25 Q And then where did you work after Caterpillar?

1 A I got this offer from Ford Motor Company. I
2 joined Ford Engine Product Development Team that was
3 working on different engines for about two years, and
4 then I moved to the Ford Performance Team. That's the
5 Ford racing team, working, again, on the engine
6 development for the racing team. Basically same work,
7 but in a different -- like a different level and
8 different requirements.

9 Q And how long did you work at Ford?

10 A Three and a half years, almost four.

11 Q And where did you work after Ford?

12 A I moved to California. I started working for
13 Faraday Future.

14 Q Faraday. Could you spell that?

15 A Yes. Faraday Future, F-a-r-a-d-a-y, Future,
16 it's Future. It's like --

17 Q And what was --

18 A That was an electric vehicle, like,
19 manufacturer in California.

20 Q And what did --

21 A I was working on the --

22 Q Go ahead.

23 A I was working on validation of different
24 systems, like battery. I work on the battery part and
25 different electronic components on the cooling system

1 and, like -- yeah. And -- yeah.

2 Q And how long did you work at Faraday Future?

3 A I think it's about 13 months or a little bit
4 more than a year.

5 Q And where did you work --

6 A I --

7 Q Sorry. And where did you work after Faraday
8 Future?

9 A I joined in Indiev. I was -- joined Indiev on
10 2018, end of June 2018.

11 Q Can you spell that.

12 A It's I-n-d-i-e-v.

13 Q E-v?

14 A Indiev, yeah. It was a new electric vehicle
15 startup in Los Angeles, and I was there until 2024 and
16 then started working for, like, my own company.

17 Q What was the nature of your work at Indiev?

18 A I joined as the CAE -- like, the computer
19 assimilation engineer and passive safety manager. And
20 then I became the VP of advanced technologies group and
21 then the VP of engineering. So I oversaw the
22 development of the vehicle and all the engineering
23 activities.

24 I worked on the simulations and validation of
25 the whole vehicle and developed the airbag systems, the

1 airbag system logics. Like in startups, you have to
2 wear so many hats.

3 Q And you said after that, you started your own
4 company?

5 A I started my own company before. But, yeah,
6 after that, I was actively working on that. I'm
7 working as a -- like, providing consultant to
8 different -- mostly smaller automotive companies in
9 different fields.

10 THE REPORTER: "Automotive companies" you
11 said?

12 THE WITNESS: Yes. I helped them with some of
13 their engineering challenges, some of the sourcing
14 parts and some simulation works and some testings.

15 BY MR. LU:

16 Q And is one of the consulting areas that you
17 provide consulting, is it litigation consulting?

18 A That's not part of my consulting work.
19 It's -- that's a side -- I mean, side project. So for
20 this project, I've been reached out by a company named
21 Patexia. And they said, "Okay. There is this case.
22 Can you help us with it?" And --

23 Q You don't need to go into the details of that.

24 A Okay.

25 Q So Patexia, that's an expert search firm; is

1 that correct?

2 A Yes, that's correct.

3 Q Okay. So how many times have you been engaged
4 as an expert for a litigation?

5 A For like a patent case?

6 Q For any case. Let's start with any case for
7 now.

8 A A few cases. Like I -- during my work in
9 Indiev, I had to work with our company lawyer for
10 different cases. And after that, I worked with few --
11 like maybe three, four cases for -- but, I mean, the
12 only patent case that I've been involved was -- is this
13 one. The other ones have to do with crash and accident
14 simulation.

15 Q The other cases besides this one are --

16 A Are mostly for crash and accidents.

17 Q I see. And for those other cases, did you
18 testify as an expert or provide an expert report?

19 A Yes, I did.

20 Q Did you provide an expert report?

21 A Yes.

22 Q I mean, did you also testify in those cases?

23 A Like, one case I did. It's nothing like --
24 like here, not in the court.

25 Q So it was a deposition?

1 A Deposition, yeah.

2 Q Okay. And then you said you have previously
3 been deposed. What was the case for that?

4 A That was, like I said, for crash, accidents.

5 Q Okay. And how long ago was that?

6 A I think it was about eight months ago or
7 something like that, seven, eight months.

8 Q Are you an inventor on any patents?

9 A I'm not, but I oversaw my team with maybe 10,
10 15 different patents. But I did not put my name on
11 those.

12 Q You did not put your name on those --

13 A No.

14 Q -- is that what you said?

15 A Yes. I was involved in the whole process.

16 THE REPORTER: Say that again.

17 THE WITNESS: I was involved in the whole
18 process at Indiev, but I -- yeah.

19 BY MR. LU:

20 Q Okay. Can you turn to Exhibit 2017, which is
21 your declaration submitted in this case?

22 A Sure.

23 Q Let me know when you have that open.

24 A I have it open.

25 Q Okay. Thank you. So can you turn to page 4,

Page 29

1 which is paragraph 5.

2 A Page 4. Paragraph 5. Yes, I have it.

3 Q So you said (as read):

4 "I have also reviewed the petition for
5 inter partes' review, the documents
6 cited in the petition and the
7 materials cited in the declaration,
8 which are listed below."

9 Do you see that?

10 A Yes.

11 Q And then you list six exhibits; is that
12 correct?

13 A That's correct.

14 Q Did you consider any other exhibits that are
15 part of this proceeding?

16 A I don't think so. Let me check. No, I think
17 that's it. That's -- no, that's it.

18 Q Okay. And one of the exhibits listed here is
19 Exhibit 1010 --

20 A Uh-huh, correct.

21 Q -- to Deschamps, D-e-s-c-h-a-m-p-s.

22 Did you provide any opinions with respect to
23 Deschamps in this declaration?

24 A No, I didn't because the timing of this was
25 filed after this patent, after the patent '203, so it

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1 was not part of the exhibits that needed to be reviewed
2 based on the agreement, yeah. That's -- that was the
3 main reason.

4 Q So you're saying you did not review Deschamps
5 because it postdates the '203 patent; is that right?

6 A Right.

7 Q Okay. Why don't we take a look at that for
8 one second.

9 Do you have Exhibit 1010 in front of you?

10 A I do not.

11 Q You don't have a digital copy?

12 A I should have. Just a second. I don't have
13 it open.

14 Q Okay. So before you do that, why don't we
15 turn to paragraph 17 of Exhibit 2017, which is on
16 page 9.

17 A Uh-huh.

18 Q And here you say -- or let me know when you're
19 there.

20 A I'm there.

21 Q Okay. So here you say (as read):

22 "I understand that Petitioner's
23 witness, Mr. Nranian, states that the
24 earliest claim priority date of the
25 203 patent is December 10th, 2009.

1 Similarly, I understand that
2 Mr. Nranian uses December 10th, 2009
3 as the relevant timeframe for his
4 analysis, so I make the same
5 assumption here."

6 A Right.

7 Q So am I correct that you are -- for the
8 purposes of your analysis, that you are assuming that
9 the earliest date for the '203 patent is December 10th,
10 2009?

11 A The earliest date of --
12 MR. BURNHAM: I'd like to object as being
13 vague.

14 You can respond now, Mehdi.

15 THE WITNESS: Yes, I think that that was the
16 time that it was filed, right? So...

17 BY MR. LU:

18 Q Well, just for the record, it was actually
19 filed December 7th, 2010. But as you stated, it has a
20 claimed priority date of December 10th, 2009.

21 Do you see that?

22 A Yes.

23 Q Okay. So do you understand what a claimed
24 priority date is?

25 A Isn't that the time that you submit your

1 summary to the U.S. Patent Office?

2 Q Well --

3 A Then you submit the full document later?

4 Q It's something like that. But I guess just
5 for your benefit, oftentimes -- let me see what
6 happened here.

7 Okay. So with respect to the '203 patent, a
8 German application was filed December 10th, 2009, and
9 then the English application was filed December 7th,
10 2010. And what you can do is, if it covers essentially
11 the same subject matter, for the English application,
12 you can say, "I claimed priority to my German
13 application that I filed in Germany."

14 And then what that means is that the earliest
15 date of the English application is going to be the same
16 date as the German application, December 10th, 2009.

17 Does that make sense?

18 A Yes. I think what I selected was -- the dates
19 that Mr. Nranian, he -- he accepted, so -- and that's
20 why I followed the same timeline, not to create a
21 different conflict.

22 Q Yes. Understood. But you don't have any
23 objections to the use of December 10th, 2009 as the
24 earliest priority date?

25 MR. BURNHAM: I'm going to object to these

1 questions as being outside the scope with respect to
2 the priority date of Deschamps.

3 You can answer.

4 MR. LU: I wasn't asking about Deschamps yet,
5 so let me repeat my question.

6 Q You don't have any objections to the use of
7 December 10th, 2009 as the earliest priority date of
8 the '203 patent; is that right?

9 MR. BURNHAM: I'm going to object again as
10 being outside the scope.

11 You can respond now, Doctor.

12 THE WITNESS: That's the timing that was in
13 the report, and I'm fine with that.

14 BY MR. LU:

15 Q Okay. So can you open Exhibit 1010 if you
16 have it.

17 A I need to find it. I don't think I --

18 Q If you don't, I can try to email you or maybe
19 send it over in Zoom chat.

20 A Give me a few minutes. I'll try to find it.

21 Q Did you find the exhibit?

22 A I did not.

23 Q Let me see if I can --

24 THE REPORTER: Counsel, if it's not too
25 long or if you're only showing him a little bit, you

1 can share your screen.

2 MR. LU: Okay. I will do that.

3 Q But just so the record is clear, you did
4 review Deschamps in preparing your declaration, as you
5 state in paragraph --

6 A Yeah. I just checked the timing of that, and
7 I figured it is not relevant, so -- just that much.
8 Not more than that.

9 Q Okay. I'll share my screen. We only need to
10 look at the first page.

11 So do you recognize this document,
12 Dr. Basirat?

13 A Yes, I do.

14 Q And I'm showing the cover page of the
15 Deschamps patent application; is that correct?

16 A Uh-huh, sure, yeah.

17 Q And this is marked as Exhibit 1010, correct?

18 A Right.

19 Q So do you see that this item 22, it says (as
20 read):

21 "PCT filed: August 31st, 2010"?

22 MR. BURNHAM: Objection; outside the scope.

23 And I'm going to continue to object as to questions to
24 Dr. Basirat related to this.

25 So, Dr. Basirat, if you could please refrain

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1 initially before stating your answer on this line of
2 questioning.

3 His report does not have any opinion or refer
4 to this reference at all, and so for that reason, I'm
5 objecting.

6 You may now respond, Professor Basirat.

7 MR. LU: Let me interject one second, Andrew.

8 You can object, but there are no speaking
9 objections allowed. So I would just ask that you limit
10 it to, "Objection; outside the scope."

11 MR. BURNHAM: Sure.

12 MR. LU: Thank you.

13 THE WITNESS: I see that, so what is...

14 BY MR. LU:

15 Q Okay. So just to clarify, you see that the
16 PCT application was filed August 31st, 2010 --

17 A Right.

18 Q -- is that right?

19 And if you go down a little bit, at item 30,
20 it says (as read):

21 "Foreign Application Priority Data."

22 Do you see that?

23 A Okay.

24 Q And then it says (as read):

25 "October 20th, 2009 (DE)" as in

1 Germany.

2 Do you see that?

3 A Yes.

4 MR. BURNHAM: Objection; outside the scope.

5 BY MR. LU:

6 Q And so you understand that a foreign
7 application -- or that this patent claims priority to a
8 German application that was filed October 20th, 2009;
9 is that right?

10 MR. BURNHAM: Objection; outside the scope.

11 Dr. Basirat, you can respond now.

12 THE WITNESS: Now, for first time, I note it.
13 I didn't notice that at that time. If you look at the
14 top of this page, it says, "Publication date
15 October 18th, 2012." And when I look into that, I say,
16 "Okay. It won't reply to this case." So I didn't go
17 further. And I confirmed that, I believe, with
18 Mr. Burnham and Mr. Smith.

19 BY MR. LU:

20 Q Okay. You don't need to tell me --

21 A That's -- that's how I look into that.

22 MR. LU: I see. So let me just ask this.

23 And, Counsel, if you want to object, feel free.

24 Q But it was Mr. Burnham and Mr. Smith who
25 instructed you that Deschamps is not prior art; is that

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1 right?

2 A No.

3 MR. BURNHAM: Objection; outside the scope.

4 You may respond, Professor Basirat.

5 THE WITNESS: No. I asked them. It's not the
6 time of the publication. It is after the established
7 date. It shouldn't be there, and they agreed.

8 BY MR. LU:

9 Q It's your understanding that prior art can
10 only be prior art if it was published before the
11 patent's earliest priority date?

12 MR. BURNHAM: Objection; outside the scope.
13 You may now respond.

14 THE WITNESS: That was my understanding.

15 BY MR. LU:

16 Q Okay. Well, for the record, that's not
17 correct. But putting that aside, you agree that this
18 Deschamps German application was filed before the
19 '203's German application, correct?

20 MR. BURNHAM: Objection; outside the scope.
21 You may now respond.

22 THE WITNESS: It looks like, right, the date
23 is prior to.

24 BY MR. LU:

25 Q Right. So Deschamps' German application was

1 filed October 20th, 2009. The 203 German application
2 was filed -- I believe it was December 10th, 2009; is
3 that right?

4 MR. BURNHAM: Objection; outside the scope.
5 You may now respond.

6 THE WITNESS: So December 10th was the English
7 version, right? What was --

8 BY MR. LU:

9 Q No, the English -- I'm sorry.

10 The English version wasn't filed until
11 December 7th, 2010, but the German version was filed
12 December 10th, 2009 with respect to the '203 patent.

13 Does that comport with your understanding?

14 MR. BURNHAM: Objection; outside the scope.
15 You may answer.

16 THE WITNESS: Now that you're -- I mean, I
17 trust you on that.

18 BY MR. LU:

19 Q Okay. So Deschamps was filed before the
20 English version of the '203 patent, and the German
21 version of Deschamps was filed before the German
22 version of the '203 patent; is that right?

23 MR. BURNHAM: Objection; outside the scope.
24 You may now respond.

25 THE WITNESS: It looks like.

1 BY MR. LU:

2 Q And so the only basis for you not providing
3 any opinions on Deschamps is because it was published
4 in 2012; is that right?

5 MR. BURNHAM: Objection; outside the scope.
6 You may now respond.

7 THE WITNESS: That was my understanding, yeah.

8 BY MR. LU:

9 Q And so you did testify in your declaration
10 that you reviewed Deschamps. Did you consider any of
11 its disclosures in providing your opinions?

12 A No. As I said -- so I just looked into that
13 date and said, Okay, the date is not prior to the
14 patent, so I didn't review it in even though -- I
15 didn't even go through that document.

16 Q Okay. And so am I correct that in forming
17 your opinions, you did not consider any of Deschamps'
18 disclosures; is that right?

19 A That's correct.

20 Q Okay. You can put that away, or let me close
21 it.

22 Okay. Going back to Exhibit 2017 -- actually,
23 it's been about an hour. Do you want to take like a
24 ten-minute break?

25 A Sounds good.

1 MR. LU: Counsel, is that okay?

2 MR. BURNHAM: Yeah, that sounds good with us.

3 MR. LU: Okay.

4 (Recess.)

5 MR. LU: Let's go back on the record, and then
6 Dr. Basirat can testify.

7 Q Welcome back, Dr. Basirat. Before we begin,
8 did you speak with anybody during the break?

9 A No, I didn't.

10 Q Okay. And you were about to say something?

11 A Like, I'm not sure if it's true. When was the
12 date that these patents were available to public?

13 Q Which one? Deschamps?

14 A Yeah, Deschamps.

15 Q I believe at least by 2012 when it was
16 published.

17 A So that's the date that's available to public?

18 Q Yeah, when the public can see it, yes.

19 A So that -- I think that that was the reason I
20 didn't consider it. It was not -- it was not there, so
21 it couldn't be relevant.

22 Q Okay. That's not entirely correct, but that's
23 okay.

24 A Yeah. I mean, I was trying to see why I
25 didn't consider it, right, during the break, so that

1 was it.

2 Q And, for the record, this is the first patent
3 case you've ever worked on; is that right?

4 A That's correct, yes.

5 Q Okay. All right. So there are a couple
6 questions I forgot to ask beforehand.

7 Dr. Basirat, where are you currently located?

8 A I'm in Los Angeles.

9 Q And when we started about an hour ago to now,
10 was there anybody else in the room with you?

11 A No, there was not.

12 Q And do you have any notes, whether physical or
13 digital, in front of you?

14 A I do have the -- not notes. I just have the
15 exhibits.

16 Q Okay.

17 A I have my papers here, but I didn't write
18 anything on those yet.

19 Q Okay. That's fine. Can you turn to
20 Exhibit 2017 of your -- which is your declaration.

21 A Sure.

22 Q And then I'm looking at paragraph -- starting
23 at paragraph 6, which is page 5. Let me know when
24 you're there.

25 A Okay.

1 Q And so from paragraph 6 through 16, these are
2 under the subheading "Legal Principles."

3 Do you see that?

4 A Right, yes.

5 Q And so these are the legal principles you
6 applied in analyzing or in providing your opinions; is
7 that correct?

8 A That's correct.

9 Q Were there any other legal principles you
10 applied besides these ones?

11 A No, I don't think so.

12 Q And if you turn to paragraph 13, you say --

13 A Yes.

14 Q Sorry. It's on page 7. Let me know when
15 you're there.

16 A I'm there.

17 Q Okay. (As read):

18 "I understand that" -- sorry.

19 You say that (as read):

20 "I understand that for an obviousness
21 argument, based on a combination of
22 prior art references, a person of
23 ordinary skill in the art must be
24 shown to have a motivation to combine
25 or modify a reference with a

1 reasonable expectation of success."

2 Did I read that right?

3 A Right, yes.

4 Q So is it your understanding that in order to
5 establish obviousness by combining two references, you
6 have to show a motivation to combine or modify a
7 reference?

8 A Yes. I think you need to have a motivation to
9 combine them.

10 Q And you applied that understanding in
11 providing your opinions in this declaration?

12 A Yes.

13 Q Okay. And then if you'd turn to paragraph 20,
14 which is on page 10.

15 A Sure.

16 Q You write "I understand" -- or you testify
17 that (as read):

18 "I understand that in this proceeding,
19 the claims are construed according to
20 their ordinary and customary meaning
21 in light of the specification and
22 prosecution history as understood by a
23 person of ordinary skill in the art at
24 the time of the invention. I
25 understand that this is the same claim

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1 construction approach used in district
2 court litigation."

3 Do you see that?

4 A Yes.

5 Q And just to be clear, you've never been
6 involved in a district court litigation with respect to
7 patents, right?

8 A No, I have not.

9 Q Okay. Are you aware that this is sometimes
10 called the Phillips standard?

11 A No, I'm not. I mean, I'm not like a lawyer or
12 any sort of expert in a law firm.

13 Q Oh, no. That's okay. Yeah. I mean, this is
14 your first time. I may occasionally call this the
15 Phillips standard. So if I call it the Phillips
16 standard, would you understand that I'm referring to
17 what you've opined here in paragraph 20?

18 A Yes, I will understand.

19 Q Okay. And this standard that you laid out in
20 paragraph 20, that is how you interpreted the claims in
21 this case?

22 A Yes.

23 Q You did not use any other claim construction
24 standard in interpreting the claims; is that correct?

25 A That's correct, as far as -- yeah.

1 Q Sorry. One second.

2 Going back to paragraph 5 on page 4.

3 A Okay.

4 Q So you have these six listed exhibits here.

5 Did you review the prosecution history of the
6 '203 patent?

7 A I reviewed the court exhibition.

8 THE REPORTER: "I reviewed the" what?

9 THE WITNESS: The court exhibition. I mean,
10 not the -- like the litigation. That's the only one,
11 yeah.

12 BY MR. LU:

13 Q You reviewed -- sorry.

14 So are you referring to Exhibit 1012?

15 A I think it's Exhibit 1012, yes. Yeah, I think
16 the petition, I reviewed that.

17 Q So you reviewed Exhibit 1012, which is
18 plaintiff's final infringement contentions; is that
19 right? This is paragraph 5 at the bottom.

20 A Yes, that's correct.

21 Q Okay. But you did not review the prosecution
22 history of the '203 patent, which is Exhibit 1002?

23 A I don't think so.

24 Q Okay. Do you have the '203 patent in front of
25 you? It's marked Exhibit 1001. Or if not, do you have

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1 a digital copy you can pull up?

2 A I have the '203 in front of me.

3 Q Okay. I wanted to -- if you'd turn to
4 page 19, which shows Figure 33. Let me know when
5 you're there.

6 A Okay.

7 Q So Figure 33 is a depiction of the filter
8 that's described in the '203 patent; is that right?

9 A Correct.

10 Q Are you familiar with this figure?

11 A Yes, I've seen that.

12 Q Okay. And so in this figure, at the bottom,
13 you have several openings. One of them is 11, one of
14 them is 12, and one of them is 13 prime or 13
15 apostrophe, and one of them is 52.

16 Do you see that?

17 A I've seen 13. I'm seeing --

18 Q Oh, sorry, not 52 --

19 A -- 13 prime and then -- which one?

20 Q I don't think it's actually 52. I think 52 is
21 pointing to something else, but 13 prime has two
22 openings; is that right?

23 A Right.

24 Q Okay.

25 A I can't see. Actually, it might be three. I

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1 see 11, 12, 13 prime, right?

2 Q Yeah.

3 A So I think may be three of them.

4 Q Yeah, yeah. That's what I meant. But 13
5 prime is an opening that has two -- an opening on the
6 left and an opening on the bottom; is that right?

7 A Yeah.

8 Q Okay. So I'm not sure if this is specifically
9 an oil filter, but let's assume that it is. Where
10 would the oil come in to be filtered, which of these
11 openings?

12 A Let me see. It should be -- it's probably
13 in -- the inlet is 11, the outlet is 12, and it looks
14 like 13 prime is some sort of drain, but it's hard to
15 say. It's very hard to go back to the whole document.

16 Q Okay. And then -- so 11 is where the dirty
17 fluid comes in, and then it goes up and gets filtered
18 by filter 2, and then the filtered liquid goes down and
19 out through 12; is that correct?

20 A It looks like it, right.

21 Q And so when the oil or the dirty oil is coming
22 in through 11 and goes up, does it go up via pressure?

23 A It should be, yeah.

24 Q Okay. And then when it goes down or when it
25 gets filtered and then goes down -- well, let me ask

1 you this.

2 So it get filtered by 2, and that's also via
3 pressure; is that correct?

4 A There is an -- there is an oil pump in the
5 engine, right?

6 Q Uh-huh.

7 A And that's what provide the pressure. It goes
8 toward the filter, and then the clean liquid is getting
9 out from the center of it.

10 Q Okay. And -- so let me see.

11 So the clean liquid, that goes out from the
12 center --

13 A Sorry, 12, yeah, right.

14 Q Yeah.

15 A So it continues drain -- not drain. The
16 outlet looks like...

17 Q And so the oil pump is providing pressure to
18 push the liquid through this filter and out through the
19 center; is that correct?

20 A Right. That's normally how the oil filtration
21 system works.

22 Q And that's how oil filtration systems worked
23 even before this patent, correct?

24 A That's how oil filtration system works for
25 engines for many years. I do not -- I haven't seen one

1 that works only based on gravity, if that's what you're
2 asking.

3 Q No, not specifically, but thank you for that.

4 And so in this filter, the incoming liquid and
5 the outgoing liquid are at the bottom of the filter,
6 correct?

7 A Correct. It's on the side bottom, yeah.

8 Q And that was, you know, a conventional
9 orientation, right? Before the '203 patent, you had
10 filters where the incoming liquid and the outgoing
11 liquid that came in were at the bottom of the filter?

12 A In -- it's not the convention. It's how you
13 design it, right? So let's say the oil filter is
14 attached to different components in the engine. It
15 depends on your packaging space or where the other
16 components are located.

17 You find where the inlet and outlet will be,
18 and also depends on the volume of the oil and the
19 pressure you can provide. You have to see if you can
20 put both on one side or no.

21 Q Okay. So perhaps "convention" was the wrong
22 word. But even before the '203 patent, there were oil
23 filters that had both the incoming and the outgoing at
24 the bottom of the filter, correct?

25 A I think so. I mean, I don't have a specific

1 one in mind, but it should...

2 Q Well, we can -- why don't we look at -- do you
3 have Exhibit 1009 available?

4 A 1009? Just one second.

5 Yes, I have it.

6 Q And just looking at the first page of 1009,
7 which is the -- this is the Cline reference; is that
8 right?

9 A That's right.

10 Q And so the figure on this first page, would
11 you agree that the opening or the valve on the left --
12 not the valve, the opening on the left is where the
13 incoming dirty liquid comes in and the outgoing clean
14 liquid goes out through the bottom of this apparatus?

15 MR. BURNHAM: I'm going to object as being
16 vague.

17 THE WITNESS: Do you have another picture of
18 it that you want? It's -- I'm not sure exactly if
19 that's -- the side one is exactly the inlet. Is there
20 another one? Like -- okay. Let me check.

21 MR. LU: I don't think there's a better
22 picture.

23 THE WITNESS: It looks like it's coming in
24 from the side, right? And then -- yeah, it's -- it's
25 on the side of the filter, and then it's going out,

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1 actually, going out through the other side of it. And
2 there is a 90-degree -- this one.

3 Yeah, it's going out through the side, and it
4 has a drain on the bottom, so the --

5 BY MR. LU:

6 Q So where --

7 A -- if you're looking into the -- you see that
8 varied throughout the fluid reservoir?

9 THE REPORTER: Say that again? "The" what?

10 THE WITNESS: The fluid reservoir.

11 BY MR. LU:

12 Q Reservoir. The fluid reservoir. Yeah, I see
13 that.

14 A It looks like there is a pipe or outlet on the
15 right -- top right side of it, and then the drain that
16 is connected with the line to that note.

17 Q So that's the drain, but is that where the
18 clean liquid is coming out?

19 A No. The clean liquid, it looks -- I mean, it
20 should be somewhere in the center, but where the pipe
21 is going I cannot tell from here. These are the two
22 outlet. You see the clean liquid is -- this doesn't
23 have a number. It's -- you see where you have these
24 numbers for the 62644 in this cylinder?

25 Q Yeah. There's a bunch of numbers in it. So

1 that's cylinder --

2 A It looks like that's the outlet, right, that
3 the clean oil is going through. So that's on that.

4 Q And do you know where the inlet is?

5 A I think it's on the side. It looks like it's
6 on the side based on what I can see here.

7 Q And you're referring to the cylinder on the
8 left coming out of the side; is that right?

9 A Yeah.

10 Q Okay. So at least the inlet and the outlet
11 are arranged near -- on the bottom half of this filter;
12 is that correct?

13 A Let me -- bottom half of the --

14 Q So let me ask it this way. So --

15 A Okay. It's on the -- it's, like, an incline
16 on right. So it's on the side of the filter, but --
17 which will be lower part of the filter, right? It's
18 not on the upper.

19 Q Yeah, the lower part.

20 And so I guess, similar to the '203 patent,
21 what happens is that pressure -- the dirty liquid comes
22 in from the left, and pressure pushes it through the
23 filter, and then it goes out through the outlet in the
24 middle down; is that correct?

25 A Right.

1 Q And, again, it's the same pump that's
2 providing pressure?

3 A I don't know if it is the same pump. It's a
4 pressurized system.

5 Q Okay. And you agree that Cline -- it was
6 published in 2004, right?

7 A Cline published, yeah, it was before.

8 Q Okay. And then in Cline, the drain is on the
9 right; is that correct?

10 A The right side of this picture? I can't say
11 that. I mean, it's hard to say. It's a vague picture.
12 But let's say it is, so -- I don't know where you want
13 to go with your question. If you could make it more
14 clear, I can give you a better answer.

15 Q I'm just wondering. So you said earlier that
16 there's this label "fluid reservoir" that's pointing at
17 to a cylinder and what appears to be some sort of plug?

18 A That's the drain, yeah.

19 Q Yeah? That's the drain. Okay. And having --
20 okay. All right. Let's go back to Exhibit 1001, the
21 '203 patent.

22 A Okay.

23 Q Okay. So if you could look at column 5, line
24 66 at the bottom of column 5, this is on page 25 of the
25 '203 patent. Let me know when you're there.

1 A What paragraph number?

2 Q This doesn't have paragraph numbers, but this
3 is column 5, line 66.

4 A Okay.

5 Q I'm looking at the '203 patent. Let me know
6 when you're there.

7 A Okay. Yes, I am.

8 Q So it says (as read):

9 "In the context of the invention, it
10 is also possible for a plurality of
11 fluid lines or channels to be arranged
12 eccentrically in the bottom of the
13 filter housing and for these fluid
14 lines or channels to be closed via a
15 plurality of eccentric blocking
16 elements which are arranged
17 accordingly on the filter insert."

18 Do you see that?

19 A Yes, I do.

20 Q So with that in mind, can we turn to, let's
21 say, page 21, Figure 35.

22 A Okay.

23 Q So Figure 35 is -- there's an element labeled,
24 24.

25 Do you see that?

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1 A Yes.

2 Q And that is what this patent calls a blocking
3 element; is that correct?

4 A Yes.

5 Q And so what this does is that as the filter is
6 inserted and rotated, it will connect with the opening
7 and seal it; is that right?

8 A It has two functions basically. One is like
9 to seal. The other one is to prevent it from movement
10 or stop -- like it has a structural function.

11 Q Okay. And so the paragraph we just looked at,
12 that says you could have a plurality of blocking
13 elements.

14 Do you know what the word "plurality" means?

15 A Here, it means different types of blocking
16 elements.

17 Q So in patents, it's a pretty common word.
18 "Plurality" just means two or more.

19 A Uh-huh.

20 Q So looking at that paragraph that we just
21 read, it's saying there could be a plurality or two or
22 more blocking elements that are arranged on this cover.

23 Would you agree?

24 A Let me go back to that paragraph. It says you
25 can have different connections or different opening in

1 the bottom of the filter housing.

2 Q Yeah. And the line I care about or I'm asking
3 about is column 6, line 2 (as read):

4 "Channels to be closed via a plurality
5 of eccentric blocking elements which
6 are arranged accordingly on the filter
7 insert."

8 Do you see that?

9 A Yes, channels to be closed, right.

10 Q Okay.

11 A I see that.

12 Q Okay. So going back to Figure 35 on page 21,
13 this only shows a single blocking element, right?

14 A Right.

15 Q So if you wanted a plurality of blocking
16 elements, you would need to place another one somewhere
17 on this cover, correct?

18 A Yeah. But my understanding, as I told you
19 before is, it's different type of blocking elements by
20 itself. So let's say you have a longer plug or a
21 smaller plug or different diameters of plug.

22 That's what I understood from this one,
23 because if you put two of these there, it would be very
24 hard to -- to follow this closing mechanism that you
25 want to, or placing mechanisms that they all follow. I

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1 mean, it's still -- it would be almost impossible. So
2 that's -- I think it means mostly different types of
3 plugs or blocking elements.

4 Q Okay. And if that's your understanding,
5 that's fine. I'll just let you know that when a patent
6 says "plurality," the only thing it means is that it's
7 two or more.

8 A Okay.

9 Q So with that in mind, suppose you wanted three
10 blocking elements on this panel. How would you arrange
11 the three blocking elements?

12 A Three blocking elements?

13 Q Yes.

14 A Why would you do that? I'm sorry.

15 Q Well, I'm just -- the patent says you can have
16 a plurality of blocking elements. So suppose you had
17 three of them. Would it be -- could you arrange them
18 like in a triangle?

19 MR. BURNHAM: Objection; it calls for
20 speculation.

21 THE WITNESS: It's like a hypothetical
22 question, right?

23 First, I mean, you need to know what these
24 three blocking elements that you want -- supposed to
25 do.

1 BY MR. LU:

2 Q So when the patent says "a plurality of
3 eccentric blocking elements," you're not sure of how
4 you would implement a plurality of eccentric blocking
5 elements?

6 A I don't -- I say that it's a different --
7 different types of plugging elements, not multiple
8 plugging elements. So I can have a plugging element
9 with a diameter of, like, one inch or one with a
10 diameter of three-quarter of inch. It will be like a
11 plurality of blocking elements.

12 Q So when it says "plurality of eccentric
13 blocking elements," you think -- you're not -- you
14 would not be able to put three identical blocking
15 elements. Is that how you --

16 A I mean, you can do that, but --

17 MR. BURNHAM: Objection; calls for
18 speculation.

19 THE WITNESS: It's -- okay. If you want to
20 put three, you can put, but then what is the advantage?
21 You're just creating more complications. That's the
22 part I do not understand. If you could clarify.

23 BY MR. LU:

24 Q I'm just reading what the patent says.

25 So is it your testimony that you don't

1 understand what the patent says?

2 A I understand what the patent says, and that's
3 what it says. It's -- you can use different types of
4 blocks. So I think they tried to not say -- not to
5 limit themselves to one exactly shaped plugs or
6 blocking elements --

7 Q Okay. So let's --

8 A -- or --

9 Q I'm sorry. Go ahead. I'll let you finish.

10 A Yeah, that's -- I think that's what -- that
11 was their intention, or that's my understanding.

12 Q Okay. So let's go back to column 5, line 66.
13 It says (as read):

14 "In the context of the invention, it
15 is also possible for a plurality of
16 fluid lines or channels to be arranged
17 eccentrically at the bottom of the
18 filter housing and for these fluid
19 lines or channels to be closed via a
20 plurality of eccentric blocking
21 elements, which are arranged
22 accordingly on the filter insert."

23 Do you see that?

24 A Right, yes.

25 Q So it's your opinion that this is only

1 referring to a single line -- or excuse me. Withdrawn.

2 So it's your opinion, reading this, that it's
3 referring to a single channel that is blocked by a
4 single eccentric blocking element, but that is just
5 contemplating different types of channels and blocking
6 elements? That's how you read it?

7 A Yeah, that's my understanding. Like as I
8 explained there, you can have a check valve there or
9 you can have a rigid plug. I think it's paragraph 6 on
10 line 5 or -- you can see the check -- yeah, the
11 plugging element can then refer to that non-return
12 check valve element, or it can be just -- just a
13 blocking element or different diameters, different
14 types. That's my understanding.

15 Q Okay. And so it can be different types, but
16 this is still just referring to one blocking element
17 arranged on the panel, right?

18 A I think so, yeah.

19 Q Okay. That's your opinion, right?

20 A Yeah.

21 Q Okay. We can put that away.

22 Do you have Exhibit 1008, which is the English
23 translation of the Yokoyama reference?

24 A Yes, I have.

25 Q So if you turn to -- this is -- yeah, sorry.

1 So if you turn to page 12, the figure in the
2 upper left, Figure 3. Let me know when you're there.

3 A Yes, Figure 3.

4 Q So in this figure, the incoming dirty liquid
5 is this opening --

6 A 15.

7 Q -- 15, right?

8 A Right.

9 Q And then it gets -- via pressure, is pushed
10 through the filter and then goes out through the --

11 A 17.

12 Q -- top middle, 17; is that right?

13 A Right.

14 Q Yeah. Now, I appreciate that you're just
15 trying to be helpful, but I think it would help if you
16 let me finish --

17 A Sure.

18 Q -- before you answer, but I do appreciate that
19 you're being helpful.

20 And then so there are these two elements
21 labeled 47 and -- well, let's start with 47.

22 47 is a seal that separates the incoming
23 liquid from the outgoing liquid; is that right?

24 A Right.

25 Q Okay. We can put that away.

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1 Actually, can we take like a ten-minute break
2 or why don't we return at noon Pacific?

3 A Well, can we do it -- like make it 20 minutes
4 so I can walk my dog?

5 Q Oh, yeah sure. Why don't we take a 20-minute
6 break then.

7 A Okay. Thanks. I appreciate it. Thank you.

8 MR. LU: So we'll come back at 12:10. Does
9 that work?

10 THE WITNESS: Yes.

11 (Recess.)

12 BY MR. LU:

13 Q Welcome back, Dr. Basirat. Did you speak with
14 anybody during the break?

15 A No, I haven't.

16 Q Okay. So, actually, can you turn to
17 Exhibit 1001 again, which is the '203 patent.

18 A Sure. Okay.

19 Q And so the claims of this patent recite an
20 incline plane and a nose that slides along it, right?

21 A It's like an incline plane, the rotation of
22 the filter insert, the engagement of the blocking
23 element.

24 Q Right. And then so if you turn to page --
25 let's see which one is a good example.

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1 Okay. Why don't we do page 7 of the patent,
2 which is Figure 7 and 8.

3 A Sure.

4 Q So looking at Figure 8 first, this is the
5 bottom panel of the filter insert, right?

6 A Right.

7 Q And then -- so there's this element labeled 4.
8 There's this protrusion sticking out of the hole, the
9 outer circumference of the hole.

10 Do you see that?

11 A Yes, I do.

12 Q And that's what the patent calls a nose; is
13 that correct?

14 A Uh-huh, right.

15 Q Okay. Oh, go ahead.

16 A No. Right, that's it.

17 Q Okay. Sorry. So looking up at Figure 7, we
18 see that there -- the bottom panel has been inserted on
19 top of this nozzle. And on this nozzle, there are
20 incline planes that are labeled -- I think they're
21 labeled 30 or -- sorry, 3.1 and 3.2.

22 Do you see that?

23 A 30 and 4 and 31, yeah.

24 Q Well, so the 4 is the nose --

25 A Uh-huh.

1 Q -- and it looks like in Figure 7, the nose has
2 already slid down the incline plane into the groove at
3 the bottom; is that right?

4 A The nose is to hold the incline plane in place
5 if that's what you're asking.

6 Q The nose is to what?

7 A Is to hold this -- the incline planes. You
8 have part 31. It's on a separate part in this picture,
9 right? It's the -- to -- it's engaging that incline
10 plane part.

11 Q Okay. So do you see there's these two
12 elements, 3.1 and 3.2? Do you see those?

13 A 3.1 and 3.2, that's the incline planes, yes.

14 Q Yeah. And so when this insert -- when this
15 panel gets inserted, the nose 4 will slide along either
16 3.1 or 3.2 and then enter the groove at the bottom of
17 those planes; is that right?

18 A Just a second. Could we look into the
19 description of Figure 7?

20 Q Yeah, yeah. Why don't we do that. So it's at
21 column 8, line 27. And -- well, why don't you read all
22 the way to line 58 to yourself, and then just let me
23 know when you're finished.

24 A Okay. Could you repeat your question, please.

25 Q Yeah. So 3.1 and 3.2 are the incline planes,

1 correct?

2 A Correct. That's correct.

3 Q And so the panel, the lower panel 22 has a
4 nose 4. And then in a normal operation, the nose will
5 slide along the incline panel -- one of the incline
6 planes and then enter this groove 31, correct?

7 A Towards the assembly of the filter insert and
8 this part 3 or 30, yeah.

9 Q Yes. And was I correct in my description?

10 A I think it's for the assembly of the filter
11 insert, correct. The incline plane in the groove will
12 engage with part 4, right.

13 Q And the purpose of the incline plane and the
14 nose and the groove is to position the blocking element
15 24 in Figure 8 into the opening where the drain is,
16 right?

17 A It's for axial position, as it said.

18 Q It's for axial position of what?

19 A It's for the axial -- axial positioning of
20 filter insert into this filter, into the filter
21 housing.

22 Q Does that have anything to do with aligning
23 the blocking element 24 with an opening?

24 A It will align the -- that one as well.

25 Q Sorry. Could you repeat what you said.

1 A I think it will align if that's -- so the
2 blocking element is part of the filter, right? So it's
3 under the lower plane of this filter -- of the filter
4 insert.

5 Q Yes.

6 A So if you do not rotate it properly, it will
7 not axially move into the drain -- the drain opening or
8 the drain seat, right, to engage with that. So the
9 whole system designed to provide this alignment and
10 also stop the further movements.

11 Q Okay. So the incline plane in the nose, its
12 purpose is to align the blocking element with the
13 drain; is that correct?

14 A I think, yeah, it's aligning and engaging --

15 Q Okay.

16 A -- the whole system together, yeah.

17 Q And that includes the blocking element with
18 the drain, right?

19 A Right.

20 Q Okay. So why don't we turn to page 11, which
21 is Figure 17.

22 A Page 17. Sure.

23 Q And page 11, Figure 17.

24 A Oh, sorry. Okay.

25 Q Okay. So here, you have an alternative

1 arrangement where the incline plane 3 is on the inner
2 surface of the housing.

3 Do you see that?

4 A Yes, it looks like.

5 Q So the difference between Figure 17 and Figure
6 7 was that in Figure 7, the incline plane was on the
7 outer surface of the nozzle, whereas in Figure 17, the
8 incline plane is on the inner surface of the housing,
9 correct?

10 A It has it on the housing. I don't know if it
11 has it on the lower part of the filter -- the filter
12 insert as well --

13 Q Right.

14 A -- or not, because it might -- I mean, it
15 should be there to be able to -- that you can rotate it
16 on top of each other. So on both of them, we have.

17 Q All right. So if you look at Figure 18 --
18 that's the lower panel of the insert -- you'll see that
19 here, the nose is on the outside of the panel.

20 Do you see that nose 4?

21 A Figure 18? Yes, I see it.

22 Q Yeah, Figure 18. So when the insert is
23 inserted, nose 4 is going to slide along this incline
24 plane 3 of Figure 17, correct?

25 A Nose 4 slides into the groove between the two

1 incline surfaces.

2 Q Of Figure 17, right?

3 A It's hard to say Figure 17 or --

4 Q Okay. Well, why don't you --

5 A It's not -- it should be. I mean, I cannot
6 say for sure.

7 Q Okay. Why don't you look at --

8 A The --

9 Q I'm sorry. Why don't you look at column 10,
10 line 23 through 41.

11 A Column 10.

12 Q Are you there?

13 A Yes, sir.

14 Q Yeah. Why don't you read starting at line 23
15 to 41, or, I guess, go all the way to 45 and let me
16 know when you're done.

17 A Okay.

18 Q So was my description correct? When the
19 filter insert is inserted into Figure 17, the nose of
20 the lower panel is on the outside, and it slides along
21 incline plane 3 into groove 31; is that correct?

22 A It rotates into the groove 4, and then another
23 axial movement with the spring provided will push it
24 right through that sliding mechanism.

25 Q Yeah, and then so in Figure --

1 A And --

2 Q I'm sorry. Go ahead.

3 A Let's go to that figure on page 17. There is
4 this -- or what -- the previous picture that you showed
5 between the two -- between the two incline surfaces,
6 there is a vertical space, right, for this nose 4 to
7 slide up and down to -- like for the blocking element
8 to properly seal the drain.

9 So that sliding movement is to -- like it's
10 for the -- basically, the plug or the blocking elements
11 to move inside the drain.

12 Q All right. So I've been calling that a
13 groove. But before that happens, the nose slides along
14 the incline plane 3 until it gets into position where
15 it will go down into the groove; is that correct?

16 A It gets to this position, right? So now
17 either it needs an extra -- like a pressure, right, to
18 push it down or some other types of assembly probably
19 that push it down. So you slide it, it gets engaged,
20 right? It stays at whatever level. Like, if you're
21 looking to Figure 22, you see the groove 31, right?

22 Q Yeah.

23 A So the blocking element or this protruded nose
24 4, it will relocate in 31, in the groove 31. But there
25 in that groove, it will be determined by the type or

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1 how much pressure you need to push the plugging -- the
2 plug element into that -- the blocking element into
3 that.

4 Q I see. So my question was more about what
5 happens before it is aligned with the groove. The nose
6 is just sliding along the incline plane 3, right?

7 A The nose? Again, you have different type of
8 application -- different type of picture. If the nose
9 is down there, then you replace the incline planes.
10 Then the incline planes will go stuck -- drop onto this
11 nose, right?

12 So it can be -- it doesn't show necessarily
13 that it will, like, slide -- the nose slide on the
14 incline plane. That's what I'm trying to say. Maybe
15 in one of the samples, they have it or not but not
16 necessarily. That's -- that's not always the case for
17 this specific patent.

18 Q So looking at Figure 17, your opinion is that
19 the nose doesn't slide along incline plane 3?

20 A For -- on Figure 17?

21 Q Yeah, Figure 17 of page 11, which is what I've
22 been asking about.

23 A Uh-huh.

24 Q Do you see the incline plane that's labeled 3?

25 A So the incline -- for this one, yeah, it

1 has -- there's a slide over the incline planes to get
2 to this groove 31.

3 Q Right. So when the insert is inserted into
4 this housing 10, the nose will -- yeah, will usually
5 slide along incline 3 into the groove 31; is that
6 correct?

7 A Yeah. It will go to the groove 31 in the
8 portion of groove 31.

9 Q Right, but can you confirm that the nose
10 slides along incline plane 3?

11 A That the nose will slide along -- I mean, the
12 rotation cause the nose to slide along -- along part
13 31.

14 Q And then so -- and that's the same mechanism
15 as what we saw in Figure 7, correct?

16 A Right, yes.

17 Q Okay. And so Figure 7 and Figure 17, those
18 are just obvious alternatives to each other?

19 A I think it's -- (indiscernible).

20 Q Is that a yes? I'm sorry. What was your
21 answer?

22 THE REPORTER: "I think it's the" what?

23 THE WITNESS: Yes, I think it is.

24 THE REPORTER: "The" what "design"?

25 THE WITNESS: Different design considerations

1 or different design approach, that's -- difference
2 design alternatives that they have for this.

3 BY MR. LU:

4 Q But -- so it's basically a choice in design.
5 Is that what you're saying?

6 A It looks like.

7 Q Sorry. What was your answer?

8 A I said it looks like it's their design choice
9 or their design alternatives.

10 Q Okay. Can you turn to Exhibit 1006, which is
11 the Honermann reference, if you have it.

12 A I do have it. Okay.

13 Q And you're familiar with this reference,
14 right?

15 A Yes, I am.

16 Q Okay. So the whole mechanism for this filter
17 is a little complicated to me. So maybe you can help
18 me out and try to explain this.

19 So I wanted to start looking at Figure 6,
20 which is page 7. Let me know when you're there.

21 A Okay.

22 Q So Figure 6, this is a filter insert, right?

23 A It's the cartridge, I believe, right?

24 Q Well, so it's the insert that goes into -- so
25 that -- sorry.

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1 Let's look at Figure 7. Actually, I think
2 that's easier. It's the next figure on page 8?

3 Do you see that?

4 A Yes, I do.

5 Q So Figure 7 is inserted into the housing in
6 Figure 8, correct?

7 A Right.

8 Q Right. And so in Figure 7, we have some
9 protrusions, 121 and 122.

10 Do you see that?

11 A On Figure 7?

12 Q Yes, Figure 7.

13 A Yes, I see it.

14 Q Okay. And then in Figure 8, those protrusions
15 interact with this basket at the top of that middle
16 section.

17 A Yes.

18 Q Do you see that? Let me see. The basket
19 is --

20 A Yes, I see that.

21 Q -- basket --

22 A 304.

23 Q -- 304, yes, yeah.

24 Okay. And like there's a couple better
25 figures of the basket. Let's see if we can find one.

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1 So like Figure 18, do you see that?

2 A Yes, I do.

3 Q Okay. And so this basket -- so the insert has
4 these protrusions that interact with the basket,
5 correct?

6 A No. Actually, it's the cartridge that has --
7 the filter cartridge, that's how they -- filter insert
8 is basically just the filter media. It's the -- they
9 call it cartridge, right? And that has these
10 protrusions.

11 Q Okay. We can call it a cartridge. That's
12 fine. So the filter cartridge has these protrusions,
13 121 and 122, and they interact with the basket,
14 correct?

15 A Correct.

16 Q And so as the cartridge is inserted, the
17 basket rotates via this interaction; is that correct?

18 A Basically, you rotate -- I believe you rotate
19 the cartridge which caused the locking and unlocking of
20 this mechanism. The number -- I have it in my
21 report -- in my testimony if you want to go back to
22 that one. It's easier to explain I think with the
23 picture I put there.

24 Just a second and let me -- yeah. If you go
25 to page 49 of my testimony.

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1 Q Page 49?

2 A Page 49. There are two pages, two pictures.

3 Q Okay.

4 A Actually, it's better to go to -- sorry, to
5 page 45, the pictures there --

6 Q Okay.

7 A -- on Figure 11 and 12.

8 So we have this plug mechanism in this filter,
9 right, in the Honermann filter. So, basically, when
10 you rotate this -- the cartridge, it gets like a -- it
11 rotates against this basket causing the engagement of
12 part 22 -- 222 with the part 302, right, which is like
13 to plug the drain or unplug the drain --

14 Q All right. So let me stop you there. So I
15 have a question.

16 A Sure.

17 Q So everything you just said, I got that from
18 your report. The one thing I didn't quite understand
19 is, how does the rotation of the basket cause 222 to
20 interact with the plug to -- to drop the --

21 A There is a spring. I think it's 338 on the --
22 it's connected to this basket, right? And so you
23 rotate the spring. It goes down and up. So that's how
24 it -- basically, it release the plug or push it.

25 Q So when it's unplugged, it's in tension with

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1 the spring, and when it's released, it goes into the
2 drain. Is that how it works?

3 A When you lock the basket, basically, it push
4 this 302 -- or sorry, what's the part number? 244,
5 sorry. It push that one down to plug the drain. And
6 then when you unlock the basket, right, you just turn,
7 basically, this -- the whole filter is open.

8 Q So let me start with -- let me start with the
9 locking mechanism.

10 Can you explain how we go from rotating the
11 basket to the drain being -- to the 302 being inserted
12 into the drain?

13 A It -- 244 you mean, not 302.

14 Q 244, sorry. 244.

15 A Yeah. So the mechanism, it's in a
16 spring-loaded mechanism, and it's connected to this
17 basket. From what I see from -- and what I understand
18 is when you rotate it and it's in the locked position,
19 it applies enough pressure on the spring to push the
20 part 240 down. Now, when you unlock it, the spring is
21 released. It let it go. So the spring 338, you see
22 that one --

23 Q Yes.

24 A -- on this? That's the mechanism. That's
25 where the load is applied. And then the battery

1 rotation of the baskets, I think it helps with the --

2 Q Could you --

3 A -- loading and unloading of this. Sure.

4 Q So could you explain how the rotation of the
5 basket releases or tensions the spring?

6 A The rotation of the basket is -- so let's say
7 you put this cart- -- the cartridge is inside and the
8 basket is in there, right? So either you -- there
9 is -- if I understand correctly, there is no --
10 rotation of basket, 304.

11 It basically engaged or disengaged those for
12 protruded noses that you showed me in the previous
13 picture with these grooves on the basket.

14 Q Right. Now, that part I get, but I guess -- I
15 understand the protrusions caused the basket to be
16 rotated, and I guess I don't quite understand how
17 rotating the basket causes the spring to be released.

18 A The whole cartridge, I think at that time,
19 will be released. It has nothing to hold the basket
20 and the cartridge in place in the housing.

21 Q Okay. And then -- so when you unplug the
22 drain, how does that work?

23 A When you unplug the drain? How do you mean
24 unplug the drain?

25 Q So, like, what's the mechanism for unplugging

1 the drain? Like when you're trying to remove the
2 insert --

3 A When you --

4 Q I'm sorry.

5 A When you push it, like, there should be some
6 pushing in, right, either on the cartridge itself when
7 you are putting it into the filter, or there should be
8 some incline plane on this -- the filter housing or
9 the -- on the basket to help with a downward motion.

10 I think it's -- like, you push it in; then you
11 turn it; now it's locked. As soon as you turn it back,
12 it's spring loaded, it's unlocked. And that part moves
13 out. This is -- that's how it sit.

14 Q Okay. So if you'd go to Exhibit 1009, the
15 Cline reference.

16 A Okay.

17 Q So in this filter, if you look at -- I guess
18 look at Figure 5, which is page 6.

19 A Okay.

20 Q And so you have this blocking element on
21 Figure 5, right, on the bottom of the panel?

22 A I think they are calling it, like, the plug,
23 yeah.

24 Q Sure, the plug. And so that goes into -- so
25 in Figure 6, that goes into this drain --

1 A Right.

2 Q -- on the right, correct?

3 A Correct.

4 Q So there's no guiding mechanism, but,
5 basically, all you do is you aim the block element into
6 the drain, and then you just push it. Is that how it
7 works?

8 A It looks like you -- there is the -- I don't
9 see a guiding mechanism on this one, but if you look
10 into page 3 -- so you have this cap 20 and the spring
11 there, right?

12 Q On page -- Figure 2?

13 A Figure 3 on page --

14 Q Okay.

15 A -- 4. They have this cap, and then there's
16 this spring there. You have to, again, visually be
17 able to make sure that this plug goes into the drain.
18 But then if you don't put it properly, you cannot,
19 like, tie the cap. Nothing will fit, so -- but it is
20 creating complications and not very efficient, yeah.

21 Q So what you're saying is that if the blocking
22 element is not aligned with this drain, you're not
23 going to be able to screw the cap on?

24 A Yeah, you cannot.

25 Q Okay. So there's no guiding mechanism for the

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1 blocking element, but in terms of the sealing process,
2 it's just simply inserting the blocking element into
3 the drain, right? There's no, like, spring mechanism
4 to do that?

5 A The spring is coming later to keep it in
6 place. So --

7 Q Right. But the spring --

8 A -- you put it in place, and then you tie it
9 down so it might be a little bit more to, like,
10 finalize the seal or the spring does keep it there.
11 And then as soon as you open the cap 20, right, if you
12 want to screw the cap 20, then the spring load will go
13 away. And either it opens the drain like immediately
14 or you just push a little bit from bottom and the drain
15 will be open.

16 MR. LU: Okay. Why don't we take a short
17 five-minute break and I'll see if I have any further
18 questions. Is that okay?

19 THE WITNESS: Sure.

20 (Recess.)

21 MR. LU: I have no further questions, and I
22 pass the witness.

23 ///

24 ///

25 EXAMINATION

1 BY MR. BURNHAM:

2 Q Okay. I have a couple of questions here for
3 you, Dr. Basirat.

4 Are you ready to take those now?

5 A Sure.

6 Q Okay. Okay. Dr. Basirat, are you a
7 registered patent attorney with the United States
8 Patent and Trademark Office?

9 A No, I'm not.

10 Q Are you a registered patent agent with the
11 United States Patent and Trademark Office?

12 A No, I'm not.

13 Q Okay. Now I'd like to turn to Exhibit 2017,
14 which is your declaration.

15 A Sure.

16 Q Can you please open it to page 42.

17 A Yes.

18 Q Do you see the figure here showing the basket
19 304 and the rotation of the basket 304?

20 A Yes, I can see it.

21 Q Okay. Related to this, is it your opinion
22 that the protrusions, 121 and 122, of the filter
23 cartridge caused the rotation of the basket 304 as
24 shown here in this figure?

25 A The basket rotates against the cartridge, and

1 then the protrusions get engaged with the basket.

2 Q Yes. So to clarify, is it your position that
3 when the -- your opinion is that the filter cartridge
4 is inserted into the filter housing, and that causes
5 the rotation in this figure; is that correct?

6 MR. LU: Objection; leading.

7 THE WITNESS: It is -- you put it inside the
8 cartridge, and then -- you put the cartridge inside the
9 housing and rotate it against the basket, and
10 everything will get engaged and plug the drain, all the
11 mechanism.

12 BY MR. BURNHAM:

13 Q Okay. And then one final question here.

14 Does your opinion explain in detail how the
15 Honermann reference functions?

16 MR. LU: Objection; vague.

17 THE WITNESS: Could you repeat the question.

18 BY MR. BURNHAM:

19 Q Yes. Does your opinion go through a detailed
20 explanation as to how each element of the Honermann
21 reference functions?

22 A I think I covered a good portion of it.

23 Q Okay. I am going to open up Exhibit 1006
24 here, which is the Honermann reference.

25 A Okay.

1 MR. BURNHAM: I have no further questions,
2 actually. We can leave it at that.

3 MR. LU: Okay. I have no further questions
4 either.

5 MR. BURNHAM: I would like to request 30 days
6 for review and signature for the transcript, please.

7 (TIME NOTED: 1:01 p.m.)

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I, MEHDI BASIRAT, Ph.D., do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this _____ day of _____,
20____, at _____, _____.
(City) (State)

MEHDI BASIRAT, Ph.D.
Volume I

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken before me
4 at the time and place herein set forth; that any
5 witnesses in the foregoing proceedings, prior to
6 testifying, were administered an oath; that a record of
7 the proceedings was made by me using machine shorthand
8 which was thereafter transcribed under my direction;
9 that the foregoing transcript is a true record of the
10 testimony given.

11 Further, that if the foregoing pertains to the
12 original transcript of a deposition in a Federal Case,
13 before completion of the proceedings, review of the
14 transcript [] was [] was not requested.

15 I further certify that I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney or any party to this action.

18 IN WITNESS WHEREOF, I have this date subscribed my
19 name.

20
21 Dated: March 20, 2025

22 
23

24 NADIA NEWHART

25 CSR NO. 8714

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1 ANDREW BURNHAM, ESQ.

2 aburnham@gbc.law

3 March 20, 2025

4 RE: Champion Laboratories, Inc., First Brands Group v. Hengst SE
5 3/14/2025, Medhi Basirat, Ph.D. , Volume I, (#7241329).

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 ___ 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 ___ 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 ___ 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 ___ Signature Waived - Reading & Signature was waived at the
25 time of the deposition.

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1 _X_ 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 ___ Federal R&S Not Requested - Reading & Signature was not
10 requested before the completion of the deposition.

1 Champion Laboratories, Inc., First Brands Group v. Hengst SE
2 Medhi Basirat, Ph.D. , Volume I (#7241329)

3 E R R A T A S H E E T

4 PAGE_____ LINE_____ CHANGE_____

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18 REASON_____

19 PAGE_____ LINE_____ CHANGE_____

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21 REASON_____

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24 (Medhi Basirat, Ph.D. , Volume I) 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.

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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.

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