

Transcript of Glenn Vallee, Ph.D.

Date: January 20, 2025
Case: Trove Brands, LLC -v- CamelBak Products, LLC (PTAB)

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TROVE BRANDS, LLC,

Petitioner,

v.

CAMELBAK PRODUCTS, LLC

Patent Owner,

IPR2024-00858

Patent 8,905,252 B2

REMOTE DEPOSITION OF

GLENN VALLEE, PH.D.

January 20, 2025

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

Job No. 568338

January 20, 2025

Remote Deposition of GLENN VALLEE, PH.D., held before Susan S. Klinger, a Registered Merit Reporter and Certified Realtime Reporter of the States of Texas.

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A P P E A R A N C E S:

Attorneys for Petitioner:

Joseph F. Jennings, Esquire
KNOBBE MARTENS OLSON & BEAR, LLP
2040 Main Street, 14th Floor
Irvine, California 92614
949.660.0404

Attorneys for Patent Owner:

Jason R. Mudd, Esquire
SHOOK HARDY & BACON LLP
2555 Grand Boulevard
Kansas City, Missouri 64108
816.474.6550

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P R O C E E D I N G S

GLENN VALLEE, Ph.D.,

having been first duly sworn testified as follows:

EXAMINATION

BY MR. MUDD:

Q Good morning.

A Good morning.

Q Can you state your name for the record, please?

A Glenn Vallee.

Q Can you spell that for the court reporter, please?

A First name Glenn, G-l-e-n-n, last name Vallee, V-a-l-l-e-e.

Q And you have been retained as an expert witness in this matter by the petitioner Trove Brands; is that correct?

A That's correct.

Q Where do you currently reside, Dr. Vallee?

A My home address is 194 Meadowlark Lane, and that is in Westbrook, Connecticut, and that is where I am today.

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Q Thank you. What is your current occupation and who is your employer?

A I am the chairman of the mechanical engineering department at Western New England University in Springfield, Massachusetts.

Q Since we're taking this deposition remotely via Zoom today, can you let me know is there anyone else there with you in the room?

A No, I am alone.

Q And have you brought anything with you to your deposition today such as notes or any other documents?

A All I have before me is a binder that has my report and prior art and the asserted patent, that is all I have.

Q So does that binder only contain materials that are already of record in the proceeding?

A Yes.

Q Thank you. And I assume you have had your deposition taken before?

A I have.

Q About how many times?

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A Around 25 to 30, something like that.
Q Thank you. Just briefly go through some ground rules as a refresher. I will be asking you questions and you will be answering those questions as we've been doing; is that fair?
A That is.
Q And if I ask a question you don't understand, will you please let me know so I can try to rephrase it?
A I will.
Q And so if you answer a question, I will assume you have understood it; is that okay?
A That's fine.
Q And you understand the testimony you give today is under oath and it is the same oath as if you were testifying in a court of law; is that understood?
A Understood.
Q Is there any reason such as medication or illness that would prevent you from testifying truthfully and accurately today?
A No.

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Q Okay. We will try to take regular breaks, as often as you need them, probably about once per hour. But if you need a break at any time, will you tell me?

A I will.

Q And I will just ask that you answer any pending question before a break, okay?

A That is fine.

Q What did you do to prepare for today's deposition?

A Well, I reviewed my report and the associated documents, the prior art, the file history and then I had several meetings with counsel just to help refresh my memory.

Q Great. Which counsel did you meet with to prepare for today?

A Mr. Jennings, who is here and Cheryl Burgess, who is in the same firm as Mr. Jennings.

Q Thank you. About how many meetings did you have with them?

A I believe it was two.

Q And about how long in total did those

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meetings last?

A I don't recall exactly. It was somewhere around three hours or so per meeting give or take.

Q Did you have discussions with any non-lawyers about your deposition today?

A No.

Q And did you review any documents to prepare for your deposition today?

A I did.

Q Did you review any documents to prepare that were not already of record in this proceeding?

A I don't think so, no.

Q And you understand that you're testifying today with regard to IPR2024-00858; is that correct?

A That is correct.

Q And that is regarding United States Patent 8,905,252; is that right?

A That's correct.

Q I've dropped Exhibit 1001, which I will represent is a copy of U.S. Patent 8,908,252.

I've placed a copy of that exhibit into the chat.

(Exhibit 1001 marked.)

Q Feel free to refer to that version or if you have a hard copy version you would like to refer to, that is fine as well.

A Okay, thank you.

Q And if I -- if I call the subject patent the '252 patent, will you understand what I'm referring to?

A I will.

Q So you have reviewed this document, Exhibit 1001, the '252 patent before, correct?

A Correct.

Q And you're familiar with this patent, correct?

A Correct.

Q And you have offered some opinions with regard to this patent in this proceeding, correct?

A Correct.

Q What is your understanding of the invention of the '252 patent in this proceeding?

MR. JENNINGS: Object to the form.

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A Well, I discuss that in my report. I will go to page 19.

Q And so just so the record is clear, are you referring to Exhibit 1003, your declaration in this proceeding?

(Exhibit 1003 marked.)

A Yes, my declaration, that's right.

Q Okay.

A I'm sorry, so we're going to page 16.

Q 16 you said?

A Correct. Page 16 of my report of the Section A that talks about the overview, okay. So as I state it is related to -- and I'm on paragraph 31. And by the way if I -- if you can't hear me because I'm facing the document, please let me know. Is it okay so far?

Q Yes, I can hear you.

A Okay, great.

It is related to drink containers including a liquid container and cap assembly that is removably coupled from the liquid container. That is what the patent has to do with.

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Q And do you have an understanding of what was purported to be new with regard to the '252 patent?

MR. JENNINGS: Object to the form.

A Do you mean the novel -- the novelty of the invention, is that what you are referring to?

Q Yes, that's correct.

MR. JENNINGS: Object to the form.

A That is discussed in the patent itself. So this is the '252 patent I'm going to refer to and I will go to -- just bear with me, please. So as we discussed, the container related to, I'm sorry, the invention is related to drink containers and the cap assemblies, where the cap assembly can be opened or the -- we will call it the closure can be removed from the, what we will call the spout and it can be retained in one embodiment within the handle for storage. That is basically what the claimed novelty is.

Q So in your opinion, the patent purports that its novelty relates to retaining the closure within the handle of the drink bottle; is that

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right?

MR. JENNINGS: Object to the form.

A Yes, that's correct.

Q And is part of the novelty of the '252 patent that it purports to have -- related to something called a closure retention mechanism?

A That is correct, and that is claimed in claim 5, for example.

Q In your opinion, what problem or problems was the '252 patent attempting to solve?

A Again, we will go back to the patent. I believe it was trying to solve the problem of removing the closure and finding a way to stow it either in the handle or on the cap so that it wouldn't be lost.

Q Do you believe the '252 patent was also purporting to attempt to solve the problem of the closure hitting the user in the face as they drink from the bottle?

MR. JENNINGS: Object to the form.

A Go back to my report.

I don't recall that specifically being one

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of the goals of the invention. If you could refer me to someplace in the -- where it says that. I don't think that was the main purpose of it, as I recall, although in the end it may have resulted in that. And I know that is not referred to in any of the claims.

Q Okay, thank you.

And in going to the bottom of page 18. And when I refer to the page numbers, I will refer to the native page number printed on the document instead of the PDF number, page number. So the bottom of native page 18 of Exhibit 1003 at the start of paragraph 34. Are you there?

A Is that the patent?

Q Of your declaration?

A Okay, I'm sorry. That page again was?

Q Page 18.

A 18.

Q The last line at the bottom.

A Okay. That would be paragraph 34, correct?

Q Yes.

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A Okay, I'm there.

Q You state in paragraph 34, the closure retention mechanism on the handle of the '252 patent cap assembly consists of spaced apart tabs 56 that engage and retain the closure in the stowed position.

Do you see that?

A I do.

Q Is it your opinion that the claimed closure retention mechanism of the '252 patent consists of the spaced apart tabs 56?

A That is correct. And I highlight that in I will call it pink right above paragraph 34. And that points to the two tabs also in pink, items 56.

Q All right. Thank you.

Are the spaced apart tabs 56 the mechanism by which the '252 patent purports to address the problem it is addressing?

MR. JENNINGS: Object to the form.

A The tabs are intended to, I will call it the closure. I will call it the closure, because

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that is in the figure. The tabs are intended to retain the closure in the open position.

Q And when you say the "open position," you are referring to the fact that the closure is not covering the drink spout?

A Correct.

Q I have some general questions about Exhibit 1003, your declaration. So Exhibit 1003 can you just confirm that it is your declaration that you have submitted in this IPR proceeding, correct?

A That would be -- yes, 1003, I believe is what you called. I may have that tabbed as -- no, I just have a declaration. But that would be the IPR titled Trove versus CamelBak declaration of Glenn E. Vallee. That is my declaration.

Q Yes. And in the bottom right corner there should be a Exhibit 1003 designation.

A That is not on my copy. I can just make -- actually, if I open the chat maybe that is the smart thing to do. Yes, I'm just in the chat you showed me, like, Exhibit 1001 is the patent, 1003

is the declaration. So I will just open these on the side so we don't have to spend any time doing this.

Q Okay.

A I will just open these things up.

So to answer your question yes, 1003 is my declaration.

Q Okay. And I believe you have also at certain points in the deposition so far referred to this document as your report also?

A Correct. Technically my report would be a declaration.

Q Okay, thank you.

If you could go to the very last page, page 145 and confirm if that is your signature on page 145?

A That is my signature.

Q And does this declaration contain all of the opinions you have rendered in this IPR proceeding?

A It does contain all of the opinions I have rendered.

Q And did you author this declaration?
A I did.
Q And do you stand by all of your opinions set forth in this declaration?
A I do.
Q And are you aware of any mistake or errors in this declaration that you would like to correct?
A Other than perhaps a typo here and there, I'm not aware of anything I would like to change.
Q Thank you. If you could turn to page 8 of your declaration?
A Page 8, I'm there.
Q And you state in paragraph 10 that Exhibit A to this declaration is a copy of your curriculum vitae. Do you see that?
A I do.
Q But it appears that there is not any Exhibit A attached to this declaration; is that right?
A Not to the declaration itself. Exhibit A is part of the declaration, but it is not actually

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attached. And in the chat that version, yeah, it is not there either.

Q So it is not in your copy or the one in the chat?

A Correct.

MR. JENNINGS: So Jason, I'm just appreciating that now, appears to be an inadvertent oversight. You did not get a copy of his CV?

MR. MUDD: We didn't, no, we didn't. It wasn't attached to the declaration and we didn't see it otherwise submitted as an exhibit.

MR. JENNINGS: Okay.

Q So since I don't have a copy of your CV, I would like to briefly ask you some questions about your education and work history if that is all right?

A That is fine.

Q So what degrees do you hold and from where?

A I hold a Ph.D. in mechanical engineering from the University of Rhode Island, in Kingston,

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Rhode Island. And I also have a master's degree in mechanical engineering from the same institution and also a bachelor of science in mechanical engineering from the same institution.

Q And in what year did you obtain your Ph.D.?

A 1995, 30 years ago.

Q Time flies.

A It does.

Q I believe you testified earlier you are currently the chair of the mechanical engineering department at Western New England University?

A Correct.

Q And how long have you held that title?

A Since 2022.

Q And how long in total have you been employed by Western New England University?

A Since 2004, no. I actually have a copy of my CV, it has been so long. I joined Western Illinois University in 2002 -- 2002.

Q And what prior titles have you held at Western New England University?

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A I was an associate professor and technically my title now is associate professor and chair of mechanical engineering. Before assuming the chairmanship, I was an associate professor of mechanical engineering, and prior to that I was an assistant professor of mechanical engineering.

Q What have your job responsibilities included at Western New England University?

A Well, as chair, my job was to advise the Dean as to staffing and oversee the general work of the faculty. I schedule classes for my department. I evaluate personnel and give them annual evaluations. I am in charge of the budget, in assisting the Dean in forming the budget. I represent my department to the whole university where needed as the chair. I'm responsible for requesting manpower, resources, things like that.

And I'm always trying to improve the performance of the faculty and ensure that the programs meet their goals and also making sure that we are ready for accreditation. Our

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department is accredited by an organization called ABET which is Accreditation Board of Engineering and Technology.

And I have to make sure that we're prepared for those evaluations that occur every six years. That is my responsibility as chair.

As an associate professor, I was responsible for teaching a wide range of courses in mechanical engineering including courses related to mechanical design, which includes everything from mechanisms to seals and consideration of durability, stress, general things that you would encounter in a mechanical engineering design course.

And I also created a course called product development and innovation, which layers teams of mechanical engineers and business students with the goal of trying to develop innovative commercially viable products in a very wide range of areas. I've been doing that since about 2009. We have actually had a number of patents that were issued as a result of that course.

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And I also teach about -- in that course, I teach students about how to develop products, interface with a consumer, determine the needs of the consumer, how to test, evaluate and bring things to the point where they could be manufactured.

I also was in charge of laboratory courses where we teach methods of experimentally determining different quantities. I've taught a number of courses, mechanics of materials and am in charge of the labs associated with that and the course development.

Q Do you continue to have -- strike that.

Do you continue to teach classes as chair of the department?

A Yes, I do. And I teach -- I'm in charge of coordination of the senior design -- senior capstone design project course. Every mechanical engineer has to complete a one or two semester capstone course. And the goal of that is to find a significant problem, using engineering process to solve it, develop a solution, design a solution

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and evaluate it, and quantify the results of the evaluation. That is one of the courses I teach.

Q I remember capstone well although I was a ChemE, not an ME.

Have you worked in industry prior to working at the university?

A Yes, I have.

Q For who and when?

A Well, from -- I will go back. Prior to the university, I was the director of global engineering at Remington Products Company. I was actually -- the title was Director of Engineering and Quality Assurance Worldwide and I started there in September of 1997 and left August of 2002 to join the university.

Q Okay. And how about before Remington?

A I was the -- I had several titles at Stanley Bostitch Company, that is in East Greenwich, Rhode Island. They were a subsidiary of Stanley Works and a major manufacturer of pneumatic nailers and fastening tools and links like that. I was the manager of the engineering

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laboratories. By the way, I was employed by Stanley Bostitch from 1985 to 1997.

Q Were you employed by anyone else in industry?

A No, I was not.

Q So is it correct that at Stanley Bostitch you worked on nailers?

A Pneumatic nailers, propane prior to gas-fired nailers. I worked on -- I worked on a number of products from pencil sharpeners to everything that the company sold, electric tackers, because I started there in '85 as a lab technician where I performed testing on all the products, then I was promoted to test engineer when I designed the protocols to test all the products, then I had other titles. I was a design engineer where I designed them, then I was in charge of a product line, et cetera.

Q And what product -- what types of products did you work on at Remington?

A Remington was the manufacturer of personal care products, shavers and beard trimmers. Not

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the gun guy Remingtons, these were the Victor Kiam Remingtons. And I worked on, as I said, electric shavers, manual shavers, like, razors. The whole line of oil shavers, rotary shavers.

I worked on hair setters, hair dryers, facial spas. There were a number of care -- there was the shaver division and the personal care division and I oversaw both of those. The engineers and laboratories, and I was in charge of quality assurance there. And for a time I oversaw the manufacturing department that was in Bridgeport, Connecticut.

Q While you were in industry, did you ever work on drink bottles?

A Not while I was in industry. I developed a drink bottle as part of my product innovation course that we spoke of earlier, but my industrial work had to do with -- well, everything that I just discussed most of which had some kind of sealing capabilities. And the majority had to deal with fluid flow and, you know, ergonomics, because the consumers had to hold all these

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products, things like that.

Q Did any of your work in industry relate to working on liquid containers?

A Part of the -- well, I will go through. The facial spas had a liquid that was heated and imparted a fragrance. The propane file -- the propane-fired nail gun that dealt with storage of liquid propane. Just bear with me as I go through the 40 years. I don't believe Bostitch had anything that dealt with liquids.

Remington also had hair setters where the rollers had a liquid inside that was heated to help retain the heat. Part of my work had to do with solving the leak problem that they had with many of those hair setters.

I will just quickly check with my CV just to make sure I didn't miss some of the other products. Lady shavers, in fact, most of the shavers were liquid tight. In other words, they didn't contain liquid. They were designed to keep the liquid out so you could use them in the shower, you could use them in the wet mode. They

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claim that in some cases especially lady shavers that helped with the quality of the shave. And that is most of it as I can recall.

Q Thank you. How about in academia, have you worked on drink bottles?

A Yes. As I discussed, I developed a two-piece beverage bottle in a product development course. It was a unique design that actually had two different containers that were sealed with a liquid in one. But you drew from the -- from a mouthpiece that actually drew liquid from both containers so you would have two different color liquids. And you could have, for example, a yellow liquid and a red liquid. And when you drew on it, it turned into an orange liquid, I think that was the color combination. Yellow and red I believe is orange.

So we developed that drink container. I don't believe just -- again, that was one, just checking quickly.

COURT REPORTER: Excuse me, I lost audio for a minute, could you please repeat the last

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thing you said?

(Record read.)

A Ok. After that -- and you can hear me now, right?

COURT REPORTER: Yes, I can, thank you.

A After that I went through and discussed other products, that there was a water purification system that dealt with liquids and sealing liquids although that wasn't a drink container. And I believe I also cited -- I thought there was one more. I mentioned, we talked about the beverage bottle, the water purification system and that was it.

Q And then I believe I asked whether that two-piece beverage bottle was a student designed product?

A Yes, thank you. Okay.

So where I was with that is the way the product development course works is students select a project that interests them, because they're going to work on it for an entire semester. If they're not interested, it is not

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very beneficial for the students.

So I lay out the problem, and I layout a design methodology. And basically the students implement the design task that I set before them and I teach them to do -- they do consumer surveys so they basically go out and design the product on my direction.

Q So in that particular course, had you laid out a problem focused on designing a drink bottle?

A That is correct. And as I look at my CV, that product actually turned into a capstone senior design product project. In fact, I want to make sure I'm accurate, because it was a long time ago. I believe -- I believe that was, in fact, started as a capstone project. That one I don't think was part of the product development course. That one, I'm sorry, that one was started as a capstone project.

But the same -- the same -- the same process happens. We lay out a problem and a goal. In that case the goal was to, I believe it was for -- again, it was 13 years ago, or so. I

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believe it was to -- yes, it was sponsored by a local inventor. He came to me and he wanted a student team. Now I remember, he wanted a student team to develop something novel that would catch people's eye in a drink container, because water bottles were getting more and more popular at the time.

So I sat down and I asked the students if they were interested in this and at least two were. And I sat down and I laid out the objectives that were given by the inventor of the local -- the businessman, he wasn't really the inventor. He just came up with the -- with the idea. And I took them through what the process would be in design, how we would have to go about this, how we would have to talk to consumers, because something like this is a very consumer product oriented device, and come up with the design methodology selecting materials, manufacturing processes, design tolerances, and how we would prototype and test this device.

So they performed the work under my

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direction, which is the way the capstone courses worked.

Q So was this drink bottle senior design project, the project of just one small team of students?

A That is correct. I believe there were two students on that product.

Q And was it those two students that designed the drink bottle or you?

A I gave the direction on what to design. And actually -- okay, so I have in my CV there was one student on that project, I stand corrected. This one was one student, okay. And so I indicated what the design -- so I, for example, asked the student to calculate, for example, cross-sectional areas for adequate flow. I teach them how to do that. The student would execute that task.

Then I would say once we calculate this, you need to design the different components, create an assembly. So the student would work under me. So it was designed -- I would say it

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was designed by the student and myself is the most accurate way to characterize it.

Q Again, was a physical prototype built?

A Yes, it was.

Q And did that local inventor end up commercializing that bottle?

A No, he did not. He ran into problems with funding as I recall. He loved the design. He may have even taken it to a trade show, I don't recall, but he was never able to commercialize it.

Q And I'm curious with regard to the mixing of colored liquids, was this a bottle intended primarily for children?

A Well, it was intended to grab the eye of anyone of any age who thought it was cool to have these two different color liquids, so it was intended for anyone really. And you could use -- you could unscrew the top and either fill it with your own different colored liquids, like, maybe fruit punch and orange juice. There was even talk of maybe some people using vodka and cranberry juice, but that wasn't in our purview.

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It was kind of like a novel, you know, pop off-the-shelf, eye-catching device. And it was really interesting that when it mixed the liquids section it was just interesting to watch you draw on it and then all of a sudden you get a third color. So that had a lot of appeal to the consumers we surveyed.

Q So other than that drink bottle, has your work in academia focused on design of any other liquid containers?

A The water purification system that was actually patented was involved with storing of liquid water primarily. It was developed for underdeveloped countries as a very affordable means using a bicycle to purify water. So that would draw in through a pump some water, it would use ultraviolet lighting to sterilize it. It would hold it for a certain amount of time while the sterilization occurred. And then it would be delivered into a hopefully sterile receptacle so it could be used -- so it could be actually drank. That was one as far as liquids go.

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Let me look at the list here. There was a -- let's see. There were -- there was a project developed in the product development course that was a drink mixing device. For some reason our seniors really liked to invent shot pourers and drink mixing devices, why I will never know. But there was a device that actually you put two different parts of a cocktail in it and you pushed a button and it would mix them.

There was another device that actually would -- it was very economical that actually poured shots.

There was another device just last semester that was designed to hold the container, perhaps a beer or something like that and let the wait staff know if your beer is empty.

You know, and I'm sure there were -- if I went through the list over the years I'm sure there were other products that dealt with -- for example, there was another product that was used to -- to clean pets. It was a combination of a brush -- it was for horses because evidently when

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they're brushed they can get infections for some reason. So it would hold water, it would brush and it would spray water and then vacuum it up. That was an interesting device.

There were wet vacuum projects where like a shop vac would hold a liquid. And I'm sure there were -- there were other products that escape me now that had to do with containing liquids.

There was a shower device where it would automatically clean your shower. It would be connected to a showerhead and it would have a timer so it would -- it would hold the amount of liquid and then draw from the shower and it would spray it in intervals.

That is all that comes to mind at the moment.

Q Okay, thank you.

In about how many cases have you served as an expert witness?

A In the capacity of a patent litigation or -- because I also do product liability?

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Q Let's start with total cases first.

A Oh, boy. That would be -- without having my testimony I will just say on the order of around 40, 40 to 50 I would say total. I would have to go through my detailed testimony and cases, but it is on that order, somewhere in there.

Q Okay. Thank you.

And about how many patent cases have you served as an expert witness?

A I would say approximately 30 give or take, it could be more.

Q About what percentage of your time is spent consulting as a expert witness for litigation?

A I would say it is only maybe 20 percent of my time. The rest of my time is spent at the university being the department chair, which takes an awful lot of time.

Q Of your total income last year, about what percentage came from serving as an expert witness?

A 2024 calendar year? Last year, I guess,

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it's 2025.

Q Yes.

A I don't know. I would say maybe a little less than half. I would say a little less than half of my total income. Last year was a busier than usual year for some reason.

Q At what hourly rate are you being compensated for this case?

A This case I believe is 400 per hour.

Q Is that your standard hourly rate?

A It was when I was retained, yes.

Q About how many dollars total have you billed on this case to date?

A That I don't -- I don't know. I would have to go through my invoices. I don't recall how much it was.

Q Do you know about how many total hours have you billed on the case?

A Again, I would have to look at my timesheets. I think there may have been -- I don't recall if it is one or two timesheets so far, I really don't recall without looking at my

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records.

Q You have been retained by Trove's lawyers at the Knobbe Martens law firm to serve as an expert in this IPR; is that right?

A That is correct.

Q Have you worked for Knobbe Martens in the past before this case?

A I don't believe so. If you can bear with me for a second. I don't -- I believe this is the first time I've worked with this firm.

Q Thank you.

Turning back to your declaration, Exhibit 1003, and turning to paragraph 3 which begins on page 2. Does paragraph 3 of your declaration list all the materials you have reviewed in forming your opinions in this case?

A Yes. In addition to my knowledge in this field, that is the list of documents I used in forming my opinions.

Q And my apologies, just to add to that it looks I like in paragraph 4 you also refer to reviewing the file history for the '252 patent for

which Exhibit 1002 is an excerpt. Do you see that?

A That's right. I believe I testified to that at the beginning of this deposition. I talked about the file history.

Q And so just to revise my prior question slightly, do paragraphs 3 and 4 list all of the materials you reviewed in forming your opinions in this case?

A Yes, they do.

Q And did you review any other materials in forming your opinions in this case?

A There may have been other materials. For example, if I looked at different seals or I went back into a textbook or things like that, there may be documents I looked at more for reference, than anything else. They weren't documents that formed my opinion, but there may have been others.

Q So those other materials that aren't listed, would you say that those were not relied on by you in arriving at your opinions?

A I think that is accurate. They were

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really used as background to reinforce my own -- my own knowledge or refresh my memory.

Q Just so it is clear, those other background materials you are referring to are not of record in this proceeding, right?

A What is of record would be what I put in my declaration.

Q Thank you.

Are you doing okay on time right now or would you like to take a break?

A No, I think we're good. Like an hour and a half is typically where I like to.

Q Great, that works for me.

You have an understanding of what a means-plus-function term in a patent is, right?

A I do.

Q And you have offered opinions regarding means-plus-function terms in the past, right?

A I have.

Q And in paragraphs 15 through 17 on pages 9 through 10 of your declaration you explain your general understanding of how to construe

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means-plus-function terms, right?

A I will just look at this quickly. That's correct.

Q And starting on page 23 of your declaration in Section C labeled Claim Construction you offer some opinions regarding claim construction in this proceeding; is that right?

A Bear with me while I get there. That was page 23, you are referring to, paragraph 45?

Q Not specifically. I'm more referring to the entire section labeled C, Claim Construction?

A Okay.

Q So in Section C labeled Claim Construction you offer opinions regarding claim construction in this proceeding; is that right?

MR. JENNINGS: Object to the form.

A I give opinions on my interpretation of the closure tension mechanism in the entire section. I discuss that -- that is in paragraph 45, that the claims include a side closure mechanism. And then I discuss how -- what the

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function is and then I view the whole section as basically related to my opinion on that.

Q And the term "closure retention mechanism" is the only claim term on which you offer an express claim construction opinion, right?

A I believe that's correct. Let me -- if I go to page 27 I talk about any remaining terms that may be at issue. Let's see. Yeah, I write at the top of paragraph 51 that I understand that CamelBak has asserted the claims I am analyzing in a patent infringement lawsuit in district court. I talk about how they have asserted claims related to a FreeSip product.

So yes, in that section I only know -- I don't give opinions on it. I simply say that my opinions would not depend in this instance on any construction beyond plain and ordinary meaning, because I'm not involved in the civil litigation.

Q And so other than the term closure retention mechanism, you gave claim terms the plain ordinary meaning; is that right?

A Including, well, means-plus-function, but

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yes, plain and ordinary meaning is the lens I look through as one in the art when I analyzed the patents.

Q Okay. And you opine the term closure retention mechanism should be construed as a means-plus-function term, right?

A I see it on page 23. In that paragraph is where I believe I state that. The phrase does not specify the structure.

Q It is your understanding that means-plus-function terms are to be construed to encompass the disclosed corresponding structure that performs the claimed function; is that right?

MR. JENNINGS: Object to form.

A Yes, means-plus-function, sorry.

Means-plus-function term indicates that there is no associated function. It is just the -- I'm sorry, there is no associated structure just the function. And one is to go into the specification to try to determine what the structure is.

Q And I believe you do that in paragraph 47

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for the closure retention mechanism when you state, in my opinion, the corresponding structure in the specification for performing the claimed function is spaced-apart tabs 56; is that right?

A That is correct.

Q And --

A I'm sorry I also state in another embodiment that it could be some structure on the top of the cap assembly. I'm sorry I interrupted.

Q So in the next sentence in paragraph 47 you state that the specification of the '252 patent discloses two embodiments of the closure retention mechanism; is that right?

A That's right.

Q And in one of those embodiments the closure retention mechanism is on the handle; is that right?

A That's correct.

Q And in the other --

A The bottom handle.

Q In the other embodiment it is on the exterior upper surface of the cap assembly; is

that right?

A That's right.

Q But you note in the next sentence at the bottom of page 24 that claims 5 and 19 correspond to the first embodiment only; is that right?

A That's right.

Q And that's because the claims specify that the handle includes a closure retention mechanism, right?

A Yeah, I believe that is claim 5, let's see. Right, that would be the last claim element of claim 5 talks about wherein the handle includes a closure retention mechanism.

Q And claim 19 similarly requires that as well; right?

A I believe that is so, since they're very, very similar in structure, that's correct.

Q And then you explain in paragraph 48 that this corresponding structure of the tabs 56 are shown in figure 7, which you have annotated; is that right?

A That is correct.

Q And I believe you referred to this earlier that you -- you colored spaced-apart tabs 56 pink?

A That's right, looks like pink to me.

Q And you don't identify any other corresponding structure besides just the tabs 56, correct?

A As far as the structure, that's correct.

Q Then in paragraph 50, which begins about on bottom of the page 26?

A Okay.

Q You state, one skilled in the art would have understood the corresponding structure for the claimed closure retention mechanism is two or more spaced-apart tabs extending from the inner surface of the handle.

Do you see that?

A I do.

Q Now, when you said two or more spaced-apart tabs, were you intending to encompass some spaced-apart tabs other than the spaced-apart tabs 56 disclosed in the '252 patent?

MR. JENNINGS: Object to the form.

A I will go back to the claims.

I believe paragraph 50 discusses, I believe it said it could be two or more in the specification. That is just -- bear with me for a second, I will go back to the patents. I believe that came right out of the specification. That was a problem, let's see.

Okay. I'm on column 8, around line 55 where it states, as an illustrative non-exclusive example, the closure retention structure may include at least -- at least a pair of spaced-apart and optionally opposed tabs 56. That is where that is from.

So when I wrote paragraph 50, I was just citing what the specification said, which is what I need it do since I consider it a means-plus-function term.

Q Yeah. If you look at figure 3 of the '252 patent I believe it depicts three tabs 56; is that correct?

A Let's find figure 3. Like that shows three, but that is the second embodiment.

Q Oh, that is where they were on the cap or closure?

A No, that is extended from the base I believe. But anyway it shows three tabs 56 in that figure that are not part of the handle.

Q Correct, correct, yeah.

Okay. So in your opinion, figure 3 tabs 56 are not what claims 5 and 19 are directed to?

A Correct, because claim 5 and 19 talk about a handle extending from the base wherein in the handle includes, and figure 3 does not show them included on the handle.

Q Okay.

A It shows the handle or a handle and dashed lines.

Q But the tabs 56 are the only tabs disclosed in the '252 specification for a closure retention mechanism located on the handle, right?

A Sorry, could you repeat that one more time, please?

MR. MUDD: Yeah, Susan could you read it back, please?

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(Record read.)

A Correct, and that is why I show them in figure -- figure 7, which I have on page 25.

Q So returning to paragraph 50 of your declaration when you state that one skilled in the art would have understood the corresponding structure for the claimed closure retention mechanism to be two or more spaced-apart tabs extending from the inner surface of the handle you are referring to tabs 56, correct?

A Yes, that's tabs 56.

Q Thank you. I believe you referred to it earlier, you are aware that there is a district court patent infringement case pending between the parties to this IPR Trove Brands and CamelBak; is that right?

A Correct. I am aware of that case, but I am not involved in it.

Q Okay. But I believe you have reviewed some infringement contentions from CamelBak served in that district court case, correct?

A I believe if I did I listed it, yes,

that's correct. It was Exhibit 1010, CamelBak infringement contentions.

Q Have you reviewed the district court's claim construction opinion which issued after you submitted your declaration in this IPR?

A I may have seen that. I don't recall, I may have seen it, I don't recall. It wasn't something I used to -- it wasn't part of my declaration, so --

Q Okay.

A -- if I saw it, it was only in passing.

Q I will go ahead and introduce it as an exhibit. It is in the chat, which is docket entry 108 from the parallel district court litigation between Trove Brands and CamelBak Products. If you could take a --

(Exhibit 108 marked.)

A Okay.

Q -- take a moment to review it and let me know if you have seen it.

A All right. (Reviewing document.)

Q And I will direct you specifically to page

5 with the section labeled Closure Retention Mechanism?

A I don't recall seeing this, I may have seen it. I certainly didn't study it, okay, so I am on page 5.

Q Okay. And if you could, go to the next page 6 which there is a boldface section for the Court's construction. Do you see that?

A The bold section, yeah.

Q And it says, a means-plus-function governed by 35 U.S.C. Section 112(f). Do you see that?

A I do.

Q And then under the Structure the Court lists Closed Perimeter 52, Closure Retention Structure 55, Tabs 56, Cooperating/Engaging Structure 58.

Do you see that?

A I do.

Q And do you recall reviewing the Court's construction for closure retention mechanism at any point prior to your deposition today?

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A No, I don't recall. I don't think it changes my opinion at all, though, if I were to as I read this.

Q Why is that?

A The function is clear and it is really talking about the tabs. But again, I haven't studied this. I haven't really given thought to it. I haven't been asked to analyze the '252 with respect to this.

Q Okay. Understood.

But again, the structure that you applied was tabs 56 and not these other structures listed in the Court's construction, right?

MR. JENNINGS: Object to the form.

A The structure I opine on, my understanding of the structure is the tabs. The closure retention mechanism is essentially the tabs, that is my opinion.

Q Okay. Thank you.

Can you turn back to the '252 patent at column 3, line 23?

A Column 3, line 23.

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Q There is a sentence that begins with, as used herein. Do you see that sentence?

A Got it.

Q It states, as used herein, selective and selectively when modifying an action, movement, configuration or other activity of one or more components or characteristics of a drink container according to the present disclosure means that the specified action, movement, configuration or other activity is a direct or indirect result of user manipulation of an aspect of or one or more components of the drink container.

Do you see that?

A I do.

Q In that sentence, do you understand the patent to be defining how it uses the terms selective and selectively?

A I will just read it one more time, please. (Reviewing document.) Okay, yes, I do.

Q So you do understand the patent to be defining in that sentence how it uses the terms selective and selectively; is that right?

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A It says, as used herein, so that would be correct.

Q And did you consider that definition when arriving at your opinions in this case?

A Yes, that's true.

Q And I should clarify that slightly. Did you apply that definition of the term selective and selectively in arriving at your opinions in this case?

A I believe that's true. When I looked at the -- through the lens of a POSITA, the specified action, movement, configuration, or other activity as direct or indirect result of user manipulation.

So that is a very complicated way of saying the user does something to make the selection.

Q If you could then turn to claim 5 and the last limitation of claim 5. And it recites, the handle extending from the base wherein the handle includes a closure retention mechanism configured to selectively retain the closure in a stowed position.

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Do you see that language?

A I do.

Q And so when the claim refers to a mechanism configured -- a closure retention mechanism configured to selectively retain the closure in a stowed position, does the term "selectively retain" mean that the user can cause the closure to be retained or unretained?

MR. JENNINGS: Object to the form.

A All the claim says is that it is retained when it is in the stowed position. As configured to -- so selectively, so you are going to make a choice and you are going to -- you know, let's see. So the closure retention mechanism configured to selectively retain the closure in the stowed position.

So there was retention when it's stowed.

Q So because on the definition of the term selectively that we just looked at, does the claim language mean that the user can manipulate the closure to decide whether or not it is retained in a stowed position?

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MR. JENNINGS: Object to the form.

A I believe all this claim is saying is that it is retained. When you make the choice it is -- it is -- when it is in the stowed position it is retained.

Q You referred to the fact that the user can make a choice, right?

A Well, the user does -- you know, the whole idea is to open the bottle.

Q So the user can --

A I'm sorry, my fault, I paused.

I believe all this -- all this claim means is that when the user not -- when -- let me see what is the best way.

That when -- at least when the closure is stowed, at least when, that it is retained by the tabs. That is how I interpret that.

Q And as you testified a moment ago, because the term selectively is used, the user can make a choice as to whether or not the closure is retained by the tabs, right?

MR. JENNINGS: Object to the form.

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A No, I believe -- I'm sorry, I believe what I said was the user makes a choice and it can either be closed or opened. But at least when it is open, it is retained by the tabs, right, because it says, the tabs are on the handle. So at least when it is open it is going to be retained. And the only way it gets opened is if the -- if the user decides they want to open it.

I don't think it is limiting in that respect. It is just when someone makes the decision and they are going to -- they are going to move the closure into a position where it is retained, at least then, it will be retained by the tabs. I don't think it is stating anything else in that. Just at least in that position it is going to be retained by the tabs.

Q So how does the term "selectively retain" differ from the term "retain by itself"?

A Because you have got to decide that you want it to be -- get in the stowed position. So if you make the decision that I'm going to put this in the stowed position, when it is in the

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stowed position, at least then it has to be retained by the tabs and I don't view it as anymore limiting than that.

Q So is it your opinion that when the closure is not in the stowed position it can still be retained?

MR. JENNINGS: Object to the form.

A My opinion is really just what I said. That at least when it is in the stowed position, it is retained by the tabs. I don't think it is anymore limiting than that.

Q So I believe you just testified the user can make a decision as to whether it is retained, right?

MR. JENNINGS: Object to the form.

A I believe what I said was if the user wants it stowed, the user makes the decision. If it is in the stowed position, the closure will be retained, but that -- that is really it. It doesn't say that that is the only position it can be retained. It just says in that position, it is retained in the tabs.

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MR. MUDD: Susan, would it be possible to read back Dr. Vallee's -- not his most immediate answer right now, but his prior answer where he used the word decision?

(Record read.)

Q So the use of the term "selectively retain" means that the user can decide whether they wanted the closure in the stowed position or not, correct?

A I don't think that is exactly what I said. I think what I said was if the device is going -- if the closure is going to be opened, it doesn't open by itself. But the claim says that when it is in the stowed position, someone has to decide to put it there.

At least when it is in the closure or when it is the open position, it could be in an intermediate position, but all the claim says is that, just what it says, okay. If it is going to be put in the open decision when it is, at least at that time it has to be retained.

Q So in your opinion, the use of the term

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"selectively retain" does not require the ability of the closure to become unretained by the closure retention mechanism?

MR. JENNINGS: Object to the form.

A Could you rephrase that? I'm not sure I understood your question.

MR. MUDD: Susan, could you read that back for me?

(Record read.)

MR. JENNINGS: Object to the form.

A I'm sorry, I still don't think I understand what you are asking, retained and unretained selectively.

Q Yes. So my question basically is the term "selectively retain" means that the closure is sometimes retained and sometimes not retained, right?

MR. JENNINGS: Object to the form.

A Well, it doesn't have to be. It can be retained just not necessarily in the stowed position, for example. All the claim says is again, select -- selectively retain the closure in

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a stowed position, in a stowed position relative to the handle, when the closure is selectively removed from the drink spout and received by the closure retention mechanism. Now, again, I don't think it is that limited.

Q Okay. So it is your opinion then that selectively retain does not require the ability of the closure to become unretained?

MR. JENNINGS: Object to the form.

A It does not become unretained is the same as becoming retained, isn't it, two negatives? I mean, I'm just going to stand on my prior testimony, it is probably the only way.

Q I wasn't trying to trick you there. I think I'm stating your opinion correctly as you just stated it. And that is that in your opinion, the claim only specifies a requirement of being retained in a stowed position. And that the term "selectively retain" in your opinion does not require an ability to become unretained from the closure retention mechanism?

MR. JENNINGS: Object to asked and

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answered, compound.

A I mean, I don't think I can clarify it anymore. It is -- I don't think that is --

Q Here, I will rephrase it -- I will simplify it and ask it in a different way.

So does the term "selectively retain" require the ability to become unretained or not?

MR. JENNINGS: Object to the form.

A Again, selectively retain means that the user is going to decide to retain it in a closed position, at least in a closed. So they're going to retain it at least in the closed position, but it doesn't really talk about unretaining in this claim element. That is why I was kind of really -- was having trouble understanding your previous question.

Q Yes, I agree with you. It doesn't use the term "unretained," but it does use the term "selectively retained," right?

A Right, and that is what we just discussed in some depth now.

Q And how does the word "selectively" modify

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"retain"?

MR. JENNINGS: Object to the form.

A Well, for it to be retained, okay, in the stowed position the user determines that. So they make the selection that it will be at some point in the stowed position. But again, to me, I read this claim as, you know, that at least when the user makes the decision to put it in the stowed condition, at least then, it has to be retained then. I don't think there is anything else I can add.

And it's 11:39 a.m. I don't want to interrupt your questioning, but to just break it up maybe we can take a break when it is convenient.

Q Yeah, I'm just about done with this line of questioning.

When you said the user is making a decision, what are they making a decision between?

A That at some point they want to stow the closure.

Q And when the user decides to stow the

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closure, what alternative are they deciding against?

MR. JENNINGS: Object to the form.

A I'm not sure they're really deciding against anything. They're doing an action to -- to relocate the closure.

Q A decision requires at least two options, right?

MR. JENNINGS: Object to the form.

A Well, the one option could be do nothing and whatever configuration it is in leave it there. And the other -- that could be one option. The second option could be to stow it or the option could be to close it.

Q To close the closure or the drink spout?

A I'm just saying there could be more than one option is my only point.

Q The user has to decide at least between putting the closure over the drink spout or retaining it in the stowed position?

A Well or they could decide to leave it in an intermediate position if they wanted to.

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Q I said at least in that question.

MR. MUDD: So I'll ask you, Susan, could you read that question back?

(Record read.)

A Well, I don't think it is at least, because what if the -- what if the closure were midway then they wouldn't be sliding between closed and open.

Q Okay. So the user has to decide between having the closure over the drink spout in an intermediate position or in the stowed position, correct?

MR. JENNINGS: Object to the form.

A Again, I really do not think it is that complicated.

Q I agree.

A So it could be -- it could be closed, it could be intermediate, it could be open. It could be anywhere in between. All I read of the claim is that if your selection is stowed, okay, then the -- it has to be -- let me read this.

Yeah, I mean when at least when it is

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stowed, it has to be in the closure retention mechanism is really all that says.

Q In your opinion, does the claim not allow the user to decide to remove the closure from the closure retention mechanism such that it is no longer in a stowed position?

MR. JENNINGS: Object to the form.

A All the claim says is when the handle includes the closure retention mechanism configured to selectively retain the closure in the stowed position so the claim is only talking about the configuration of the closure retention mechanism when it is in the stowed position, that is all the claim says.

Q And so the use of the term "selectively retain" doesn't require an ability of the user to manipulate the closure such that it is no longer retained in the stowed position?

MR. JENNINGS: Object to the form.

A Again, the claim really doesn't say anything about that. It just talks about the ability to retain it in the stowed position.

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Q Okay. Thank you, Dr. Vallee.

MR. MUDD: I think it is a good time for a break.

(Recess, 10:44 to 10:56 p.m.)

Q Welcome back, Mr. Vallee.

A Great to be back.

Q Could you turn please in the '252 patent to claim 5?

A Okay.

Q To the last -- to the last limitation relating to the handle. And specifically I want to focus on the last portion of that limitation that states, when the closure is selectively removed from the drink spout and received by the closure retention mechanism.

Do you see that?

A I do.

Q And do you see where the limitation uses the term "received"?

A Correct.

Q You didn't offer an express construction of the term "received," right?

A I don't believe so.
Q So would it be correct that you applied the plain and ordinary meaning of the term "received" in arriving at your opinions?
A I think that is true.
Q What plain and ordinary meaning of the term "received" did you apply in arriving at your opinions?
MR. JENNINGS: Object to the form.
A Well, it means what it says. Received which means it is in contact with.
Q So the claimed closure must be received by the closure retention mechanism, right?
A Well, when it says just what the claim says, when it is in the stowed position it must be in contact with the closure retention mechanism at least then.
Q Would you agree with the plain and ordinary meaning of receive to mean to accept or to get?
A You mean in the context of this patent? I would -- I would say received is, you know, in

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contact with.

Q Now, in contact with, that would be referring to the noun form of received. If we refer to the verb form of received in the past tense would it mean to bring into contact with?

MR. JENNINGS: Object to the form.

A I would say when it is in contact with as it is contacted referred to in the state of contact.

Q Claim 5 is using the term received in its verb form, right?

A True.

Q And the verb would require some type of action, right?

A Right, but contact is an action. I contact someone, for example.

Q So when it says, the closure is received by the closure retention mechanism, it means that it is brought into contact with the closure retention mechanism, right?

A No. I think -- again, I think it is broader than that. I think all this claim is

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saying is that however it is contacting, when it is in the state of contact, and it is in the stowed position, it is in contact with the closure retention mechanism.

So it had to be contacted somehow, at some time to be brought into contact. So when it is in the stowed position, at some point it was in contact. So at the point where it is stowed, the closure has to be in a state of contact or contacted by the retention mechanism.

Q Which means prior to that state of contact it had to have been not in contact with the closure retention mechanism, right?

MR. JENNINGS: Object to the form.

A Not necessarily, no. It is just that is something when you assemble it, until you assemble it they're not in contact. In that sense they were out of contact at some point before it was assembled. But again, this claim -- the way I understand this claim is it just requires that when it is in the stowed position, they have -- the closure retention mechanism has to be in

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contact with the closure.

Q So it is your opinion the closure can be brought into contact with the closure retention mechanism when it is already in contact with the closure retention mechanism?

MR. JENNINGS: Object to the form.

A No. I don't believe that is what I said.

Q Okay. So to be able to bring something into contact with another object it must have not already been in contact, right?

A Yes, that is why I discussed, you know, like before it is assembled you're not in contact, but so long as when it is in the stowed position, it is in contact with the closure retention mechanism, then it satisfies this claim element. It is not as specific as trying to say exactly when did the initial contact happen. It just generally states that in the stowed position the closure must be in contact with a closure retention mechanism.

Q So I like to think of the term "receive" in terms of receiving a gift. In order for me to

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be able to receive a gift, I can't already have that same gift, right?

MR. JENNINGS: Object to the form.

A See how I can put this another way, if I can. I mean, I think the claim says what it says. I think I made my understanding pretty clear what the context of this patent, you know, mechanically when someone -- when something is received it is in contact. It is not the same as getting a gift or something like that.

I interpret this claim in the context of the patent. And as one in the art and it simply tells me when it is in the stowed position. The closure retention mechanism has to be in contact with the closure. It doesn't say when. It says when in the sense of at least when it is stowed it has to be the case. It is not any more restrictive.

Q The claim language says the closure is selectively removed from the drink spout. Do you see that?

A Right, the second to last sentence. So

the closure is selectively moved from the spout, that is true.

Q So when it says the closure is selectively moved from the drink spout, that means the closure can be either on the drink spout or off the drink spout, right?

A Correct. We discussed it could also be some intermediate position. So whenever it is decided that we're going to open this, okay, the fact that it is decided just indicates that if you decide to open it, this claim tells me that the closure retention mechanism at some point has to be in contact with the closure.

Q So is it your opinion that the closure can be in contact with the closure retention mechanism when it is on the drink spout?

A Well, at this time the claim itself is not that specific. It simply says whatever else happens, when that closure retention mechanism is in contact. If it is in the stowed position, the closure mechanism has to be in contact with the closure. That is all it says, that is all it

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says.

Q When it says, when the closure is selectively removed from the drink spout and received by the closure retention mechanism, do you have an opinion on whether the term "selectively" modifies only the term "removed" or also modifies the term "received"?

A I think when I read the claim, if you decided that it is going to be in a stowed position then the closure has to be in contact with the closure retention mechanism.

Q Do you have an opinion on whether the term "selectively" only modifies "removed" or whether it also modifies "received"?

A I think selectively simply states that someone decided that the closure is going to the stowed position. I mean it reads the way it reads.

Q So you don't have a specific opinion on whether selectively modifies only removed or also received?

MR. JENNINGS: Object to the form.

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A No. My opinion is I don't think of it as what does it modify. Read the whole sentence and decide what selectively applies to and I think that I made that pretty clear so far.

Q So you don't believe the user can decide whether or not the closure is in contact with the closure retention mechanism?

A No. I believe the user decides -- reading this claim element the user decides if the closure is going to be in a stowed position or not. It decides if it is going to be -- if it is, the closure retention mechanism must be in contact with that closure at that time.

Q And what does it mean to not be in the stowed position?

A Just what you said. It is not in the stowed position. The claim doesn't talk about what is going on when it is not in the stowed position. This element talks about what happens when it is in the stowed option. And in the stowed position, the closure is in contact with the closure retention mechanism.

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Q The claim refers to a separate closed position of the closure, right?

A Well, that is where it says it starts. It is talking about what happens in the stowed position.

Q But when the closure is in a closed position relative to the drink spout it restricts dispensing of drink liquid, right?

A Yeah, but again that claim element simply talks about the handle extending from the base, the handle including the retention mechanism to retain the closure in a stowed position. I'm sorry, configured to selectively retain the closure in the closed position.

Q So yeah, I'm referring to the --

A I'm sorry, go ahead, go ahead.

Q So I'm referring to the closed position where the closure is restricting dispensing of drink liquid. Are you familiar with that position?

A Right. And if I read the claim, let's see -- let's see. The first element just says it's a

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liquid container with a neck and the liquid container holds a volume. It talks about the cap assembly, has the base. And then it has the drink spout where the liquid comes out. The closure that you can remove and coupled to the drink spout in a closed position to restrict the liquid.

Okay. So it talks about the closure. So the user, you know, wants it in the -- selects the closed position, so it is closed and in the closed position it restricts the dispensing of the liquid from the drink spout. Okay, so that is what that element said.

So that element talks about when closed, for the closed position it keeps the liquid from coming out. And the next element says, okay, let's talk about the open position. When we're in the open -- I'm sorry, stowed, sorry. In the stowed position, okay, so you have the previous element what happens when it is closed.

The last element, what happens when it is stowed. When it is stowed the closure has to be in contact with the closure retention mechanism,

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that is it. So it explains what happens in closed and explains what it is happening when it is stowed.

Q Yes, thank you.

The closed position of the closure is different from the stowed position of the closure, correct?

A Correct. That is where the word selectively comes in, because the user has to consciously decide where the closure will be.

Q So then what distinguishes the closed position from the stowed position?

A The closed position, the closure is sealed against the drink spout and in the stowed position it is stowed as defined relative to the handle. It says in a stowed position relative to the handle.

Q When the closure is in the stowed position, liquid can be dispensed from the bottle, right?

A That's true.

Q So when the closure is in the closed

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position, it is not in the stowed position, right?

A That is true.

Q So when the closure is in the closed position, it is not received by the closure retention mechanism, right?

A Well, it doesn't say that. All it says with respect to the closure retention mechanism is that when it is stowed it has to be in contact. It doesn't discuss any other position.

Q What in the claim defines what the stowed position is?

MR. JENNINGS: Object to the form.

A Well, if you look at the last claim element again. If you read that claim element, it simply says that it is in a -- they call it a stowed position. It is relative to the handle.

So it is a position where with respect to the handle it is not closed. All the claim says is the handle extending from a base wherein the handle includes a closure retention mechanism, configured to selectively retain the closure in a stowed position relative to the handle.

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So it keeps it in some position with respect to the handle. And in that position, whatever it may be, it is not open -- I'm sorry, it is not closed, right, whatever that position may be it will be -- the closure retention mechanism must be in contact with the closure. And the exact position would depend on design and other things.

Q Well, I meant to ask this question earlier. Did you discuss the substance of your testimony with counsel during the break?

A Oh, no.

Q Thanks.

Okay. Now I would like to turn to Exhibit 1004, which I represent is the Samartgis reference.

(Exhibit 1004 marked.)

Q I am dropping it into the chat. Are you familiar with the Samartgis reference, Exhibit 1004?

A I am.

Q And this is the same Samartgis reference

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that you refer to in your declaration?

A The '822, that is correct.

Q And for the record, it is U.S. Patent 9,272,822?

A That's right.

Q And have you analyzed Samartgis and rendered opinions about it, correct?

A That is correct.

Q And on page 44, I'm sorry, 43 of your declaration you have opined that claims 5 through 7 and 16 to 19 of the '252 patent are anticipated by and/or would have been obvious over Samartgis; is that correct?

A Sorry, what page are we on again?

Q Page 43?

A Paragraph 76.

Q Yes, looking specifically at the heading above that?

A Right, that is correct.

Q So you have opined that claims 5 through 7 and 16 to 19 are anticipated by and/or would have been obvious over Samartgis; is that right?

A That's correct.
Q I would like to turn to paragraph 93.
A Paragraph 93.
Q And in paragraph 93 you opined that the flap member 20 of Samartgis constitutes the claimed closure of claims -- of claim 5; is that correct?
A That is correct.
Q And in the last sentence on page 50 you state that flap member 20 includes a cap member 21 and a seal 30; is that right?
A That's correct.
Q Now, I want to turn briefly back to your summary of Samartgis in paragraph 61.
A Paragraph 61.
Q Are you there?
A Almost.
Q Okay. That is in the prior art section, okay, paragraph 61.
A I am there.
Q Okay. And you state, Samartgis's flap 20 also includes a shaped arm 22 with tracks 23 on

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each side; is that right?

A That is correct.

Q So it is correct, then, that the shaped arm 22 and tracks 23 are part of the flap member 20, right?

A That's correct.

Q Going back a few pages to page 30 of your declaration. You have an annotated version of figure 3 of Samartgis with colors. Do you see that?

A I do.

Q And in this annotated version of figure 3, you have colored all of the components of flap member 20 a what you call a royal blue or dark blue color; is that right?

A That is right.

Q And you have colored cap member 21, arm 22 and tracks 23, that same royal blue color to depict that they are all parts of the same flap member 20, right?

A Correct.

Q And so since you have opined that the flap

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member 20 constitutes the claimed closure of claim 5, then the cap member 21, arm 22 and tracks 23 are part of what you contend to be the claimed closure of claim 5, right?

A That's correct.

Q And if you could turn to paragraph 99 -- sorry for jumping around so much.

A Paragraph 99, page 54.

Q Yes, that's correct.

A Okay, I'm there.

Q And in paragraph 99 you opine that the lug members 15 and 16 of Samartgis constitute the claimed closure retention mechanism of claim 5 of the '252 patent, correct?

A Correct.

Q And you don't contend that any other components besides lug members 15 and 16 are the claimed closure retention mechanism of claim 5 in your declaration, correct?

A Well, I think exactly what I said in paragraph 99. Samartgis discloses the handle lever member 10 includes lug members 15, 16 which

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are a closure retention mechanism, so I stated it is a closure retention mechanism.

Q But you don't opine that any other components of Samartgis constitute a closure retention mechanism, right?

A The law I opine to is the Lugzar closure -- a closure retention mechanism.

Q Okay. And for example, you don't opine that the tracks 23 of the flap member 20 are part of the claim closure retention mechanism, right?

A No, I say they were received by the closure retention mechanism I believe. The closure retention mechanism I discuss is the tabs.

Q Or the lugs 15, 16, right?

A I'm sorry, yes, same thing, the lugs in this patent.

Q Yes. So just to confirm, I believe that your answer to the last question was no, the tracks 23 of flap member 20 are not part of what you contend to be the claimed closure retention mechanism in Samartgis, right?

MR. JENNINGS: Object to the form.

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A No, the tracks are part of the closure in paragraphs, I believe it is the lugs. I'm on paragraph 101 -- well, no, let me think. The closure is the flap. The closure itself is the flap that has the cap, the arm, the tracks, the seal.

Q Okay. Thank you.

So you said, no, that the tracks 23 are not part of the closure retention mechanism because they are part of the closure, right?

A Yes.

MR. JENNINGS: Object to the form.

Q Okay. Let me see. Dr. Vallee, have you reviewed the Board's institution decision instituting this IPR?

A I believe I have, yes. I didn't study it, but I do remember seeing it.

Q Okay. I've dropped Paper 7 from this proceeding, which is labeled decision granting institution of inter partes review into the chat. Can you confirm this is the institution decision that you have seen in this matter?

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A As soon as I can get it to download. This is a decision granting institution of inter partes review, okay, I see that document. The upper right it says Paper 7, I believe.

Q Yes. So have you seen this document before?

A Yes, I believe I have seen this before.

Q If you could, please turn to page 12 of the institution decision.

A Okay, I'm there.

Q And I want to go to the first full paragraph beginning with, at the outset, do you see that?

A Yes.

Q And the board says, in this sentence at the outset, we note that Trove relies not only on Samartgis's lug members to satisfy the claimed closure retention mechanism, but also on Samartgis's tracks, which receive and cooperate with the lug members to open and retain closure 20 away from the drink spout 4.

Do you see that sentence?

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A I do.

Q And then the Board cites to your declaration, Exhibit 1003, specifically to paragraphs 100 to 101, which then in a parenthetical the Board states, describing how lug members 15, 16 interact with tracks 23.

Do you see that?

A I do.

Q So to the extent the Board is suggesting here that you relied on more than just lug members 15 and 16 and also included the track 23 in what you contended to be the claimed closure retention mechanism, the Board misunderstood your opinion; is that correct?

A Well, let's take a look at those paragraphs.

MR. JENNINGS: Object to the form. Sorry, I was muted.

A Okay. Just let me quickly review those paragraphs, please. (Reviewing document.)

Okay. So I'm back to the decision here and they're talking about the claim closure

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retention mechanism. So it is saying we note that Trove relies not only on the lugs, okay. So back to your question is now?

MR. MUDD: Yes. Susan, can you read my question back, please?

(Record read.)

MR. JENNINGS: Object to the form.

A I think the Board relies on what the Board relies on. I mean, I didn't use this to formulate my opinions and I haven't studied this document in any detail to determine what exactly they mean in these paragraphs, and it doesn't change my opinions.

I would have to review the whole document before I make a determination. Well, I disagree with the Board or the Board misunderstood me. I'm not in a position to do that. I see what they wrote, but I also see what I wrote and I stand by what is in my declaration.

Q Okay. That is fair.

So you testified earlier that in your opinion the tracks 23 are part of the closure, not

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the closure retention mechanism, right?

MR. JENNINGS: Object to the form.

A The closure retention mechanism is the lugs and the track is part of the closure. It is in that -- it is in the flap.

Q So to the extent the Board believed your opinion was that the tracks 23 are part of the closure retention mechanism rather than the closure, they would have misunderstood your opinion, right?

MR. JENNINGS: Object to the form.

A Again, without reading this entire document, to make sure I understand what their context was, I'm not in a position where I'm going to agree or disagree with that. I just stand by what I wrote in my report.

Q I mean, it sure looks like to me they likely misunderstood your opinion. You can't take a position on that?

A Again --

MR. JENNINGS: Okay. Objection to the form of the question.

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A Again, I'm not going to take any position until I study the document and compare it with my report.

Q If I could turn to page 56 of your declaration, please.

A I'm there.

Q In Samartgis when the cap assembly of the bottle as shown in figures 5, 6, 8 and 9 on this page, when that cap assembly is fully assembled, the lug members 15 and 16 are always in contact with the track 23, right?

A Once it is assembled, it is.

Q Sorry, you said once it is assembled they are?

A Right, correct. I believe that is how you prefaced the question with, when it is assembled, then you refer to figures 5, 6, 8, and 9, correct?

Q Yes.

A I think so, okay.

Q So would you agree, then, that in normal use of the drink bottle by the user, the lugs 15 and 16 are always in contact with the track 23?

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A It could be. It is not restricted by the claim. The last element of claim 5, for example, we have been discussing for a while talks about -- basically says, that it includes the closure retention mechanism as configured to retain the closure in a stowed position relative to the handle. So they will be in contact when the closure is in the stowed position. So they can certainly -- they can be in contact with the closure before then.

Q Okay. So in Samartgis, what you have identified as the alleged closure is always in contact with what you have identified as the closure retention mechanism when the cap assembly is fully assembled, correct?

A Well, again, there is clearance in there in the figure. I can't say for sure if they're always in contact. I mean, the tab -- the lug is inserted into the slot, but it is in either position. For example, it could not be in contact. There is going to be clearance so the thing moves, so I don't think you can say --

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Q Let's -- sorry.

A Almost done.

I think you can definitely say it is in contact with figure 9. For example, I believe he calls that the locked position, so that is when the handle is all down in the rightmost figure. But it could be -- it could be in contact when it is closed and I don't see anything in the claim language that restricts that.

Q So the lugs 15 and 16 have to be in contact with the track in order for movement of the handle or lever member 10 to be able to open and close the cap of the bottle, correct?

A Correct. If the -- if there is no contact nothing moves.

Q So in each of figures 5, 6, 8 and 9, there is contact between the lug members and the track 23, right?

A Well, that is not necessarily so either, because if it is not in the process of moving because of the clearance they may not necessarily be in contact.

Q At what point in figures 5, 6, 8 and 9 of Samartgis is the closure received by the closure retention mechanism?

A Again, I interpreted received to be in contact, figure 9 for sure. And I show figure -- again let's see where I put it. I'm sorry, I'm just trying to find the figure I'm looking at, I guess I will just stick with figure 9, okay.

Q So that is the only one?

A I'm going to apologize and ask you to repeat the question one more time. I lost it, I'm sorry.

Q Yeah. Out of figures 5, 6 and 8 and 9 of Samartgis is figure 9 the only figure showing a -- the closure received by the closure retention mechanism?

A Well, it is not that specific. Again, we talked about there could be clearance, it may not be in contact. 6 and 8 that may be the case, I don't know, but it is certainly received in figure 9. You can't really tell from the previous. I say that in figure 9 because it looks like the lug

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has bottomed out in the slot, so figure 9 for sure. It could be in the other figures. I just can't tell from the figure -- from the -- the figures aren't really highly detailed.

Q So in figures 6 and 8 you can't tell whether the closure has been received by the closure retention mechanism?

A Again, you can't tell if they're in contact or -- they could be, but again, the claim -- that claim element we've been discussing really talking about when it is in the stowed position. And I believe Samartgis calls figure 9 the stowed position if I recall correctly, the locked position.

Q What about figure 5? Does figure 5 of Samartgis shows a configuration where the closure has been received by the closure retention mechanism?

A It could be, it could be, but again, you don't have a detail in the figure. I have to go back to Samartgis to recall if he discusses figure 5 in any more detail than he just did. If you

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will bear with me again.

No, I don't believe he does. I'm on Samartgis column 4, line 20 when he begins to discuss the principle of operation. And he's discussing figures 5 to 9. I believe that is the only place he does and he talks about --

Q Which column and line, apologies?

A Sorry. Column 4 starting at line 20 is when he discusses the principle of operation, and he talks about hand or finger pressure on the lever number 10 allows controlled movement along track 23 of the flap 20. And then he goes on just to talk about figure 8.

And then as -- I'm on line 29. Lever 10 is moved further, for example, to the position 9 it can be returned to the locking position. So he calls that the locking position.

And then he says it engage -- lugs 15 and 16 engaging the anti-tamper ramp section. So there he talks about, you know, the receiving. He doesn't restrict -- he doesn't say it can't be received in another position, but that is really

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the only place I see him talking about it is with respect to figure 9, which we will call the locking position.

Q In column 4, line 30, is Samartgis saying figure 9 is a locking position or is it saying that the lever can be returned to the locking position from figure 9?

A I think he's saying figure 9 is the locking position. It is returned -- you move that handle and you are returning it to the locking position in figure 9.

Q But he doesn't say the locking position of figure 9; right?

A I mean, that is how I interpret what he is saying. He doesn't talk about any other -- he doesn't talk about the closed position in figure 5 other than to say -- or actually I don't even think he says it. He just shows in the figure that appears to be the closed position.

So I take this portion of the specification. I read this to say that, you know, the stowed position is figure 9 and certainly the

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lugs are received when it is in that position. So the closures -- the closures received by the lugs, right, the closures received by the lugs.

Q What does he mean by figure 9 is a locking position? Does it mean that the lever is held in that position by some type of mechanism?

A I think because I just stated that locking position according to Samartgis that is analogous to the stowed position.

Q So if the user lets go of the handle in the position shown in figure 9, the handle will stay in that position?

A I'm not sure if he goes into that much detail. I believe that is just really the stowed position.

Q What does he mean by using the term "locking"?

A I interpret that to mean that that is where it is -- that is where the closure is locked into the handle, for example.

Q If it is locked into the handle, does that mean if the user lets go of the handle the closure

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won't reclose?

A I mean, based on my interpretation of his invention, I mean I believe that would be correct, because it also talks about -- I'm back in Samartgis column 4. I'm around line 30. So it says, as shown in figure 9, it can be returned to the locking position, which I'm calling the stowed position. That the lug members 15 and 16 are engaging the anti-tamper ramp section 25.

So he talks about that in figure 5. I'm going to go back to the patent. Figure 5, he calls -- no, he really just calls them an intermediate section. Okay, that is just -- that is just a wide section where it doesn't jam.

Q Where it doesn't jam?

A Yeah. It says, talks about resist jamming, line 34. Without -- I will go a little farther, maybe line 33. Anti-tamper -- okay, above that. Lug members 15 and 16 engage the anti-tamper ramp section 25 lifting the flap member 20 and allowing the lever member to pass through that section without the possibility of

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jamming.

So that is just -- so that is actually -- that is just a different section. It just says when you are getting tight it can pass through them.

Q So ramp section 25 doesn't lock the handle and cap into the position shown in figure 9, right?

A Right, it has to pass through that section while open, that is all.

Q And Samartgis never describes the section of ramp where the lugs are located in figure 9; right?

A Well, he describes it as the position where the lugs are rightmost in the -- in the channel.

Q But he doesn't assign a reference numeral or describe any particular feature other than it being the end of the track?

A Correct, he doesn't. If you look at figure 9, you can tell that is the end of the track. Yeah, I will leave it at that. You can

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see at the end of the track.

Q Okay. I want to jump back briefly to the line of questions we were at when we kind of went off course there for a little bit. And that was in your declaration we were looking at figures 5, 6, 8 and 9. And I believe you testified that certainly in figure 9 the closure retention mechanism has received the closure; right?

A Correct.

Q And then you also testified in figure 6 and 8 you cannot tell if the closure retention mechanism has received the closure, right?

A Well, I think what I said was that it could, it could be, but he doesn't talk about the fact that it is or not because he doesn't discuss the contact that I say has to be there if it is received.

Q So you can't tell one way or the other for sure whether in figures 6 and 8 the closure has been received by the closure retention mechanism?

A And I really don't elaborate on it in my report only because in my claim analysis, that is

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really -- it really isn't the issue at hand. I was focusing on that claim element 5, where I refer to the stowed position. And he explains in the specification that figures 6 and 8 really are in a stowed position.

It could be received, it certainly could, but he doesn't discuss that and I didn't focus on that in my claim analysis. I was focusing on what I considered to be the stowed position of Samartgis.

Q And then how about in figure 5, where the cap member 21 of the flap member 20 is in the closed position. Has the closure retention mechanism received the closure in figure 5?

A It could be received, I believe we discussed that earlier. He doesn't specifically talk about it, but the claims of the '252 don't discuss the closure retention mechanism and whether it is received or not in the closed position.

I'm looking at claim 5. It just says the claim element above the last one in claim 5, only

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that when it is closed to drink, the closure restricts the flow of liquid through it. So this receiving of the lugs is really only discussed in the last claim element of claim 5.

Q So you testified earlier that you -- in your opinion, figure 9 is the stowed position of Samartgis, correct?

A It is certainly the -- he calls it the -- he calls it the locking position. I just want to go through it one more time. So that is the closest he comes to calling figure 9 the locking position. The way he actually says it when it is in position 9 it can be turned to the locking position. So I interpret that to be close to or at the locking position.

Q And so is the closure in a stowed position in figures 5, 6 or 8 of Samartgis?

A No.

Q Is there a mechanism in Samartgis that locks the flap member 20 and it specifically it is cap member 21 in a closed position that will prevent liquid inside the bottle from spilling

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out?

A By mechanism you mean -- I mean, the lugs do that.

Q So figure 5 is the closed position, correct?

A That is correct.

Q Is there a feature of Samartgis that will tend to hold the cap member 21 in that closed position?

A I don't believe he talks about a feature.

Q Okay. Let's -- yeah, let's turn --

A Okay, go ahead.

Q Let's turn in Samartgis to column 6, line 15?

A All right.

Q Are you there?

A Yeah, I'm reading, sorry.

Q Okay. It says, secondly, the lever member, which also functions as a carry handle by having a kink in its side profile as shown in the drawings provides a biased load on the locking mechanism, the flap member, when the container or

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flask is being carried. This ensures a load in the direction of locking during any impact as, for example, as might be incurred by the container or flask when carried by a jogger or the like.

Do you see that?

A I do.

Q And so it is referring to a kink that provides a bias load.

Do you see that?

A That's right. That is what it says, kink.

Q And are you familiar with where that kink is located in the track in Samartgis?

A That kink would be somewhere on the left of the track. As I recall now that kink basically uses the weight of the bottle to help keep it shut because the kink is leftward of where it is connected to the base. So if you were to hold it, the weight would tend to keep it shut. That is what he's explaining here.

Q Okay. So the purpose of the kink is to try to hold the cap shut so liquid doesn't spill; is that right?

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A Yeah. More specifically it says it provides a biased load on the locking mechanism, the flap, when the container flask is carried. So you carry it by the handle and the weight helps close it shut, keep it shut.

Q Okay.

A I think that is his intent here.

Q Okay. Can you turn to column 2, line 27 of Samartgis?

A Line 27 it was?

Q Yes. It is in the brief description -- sorry, the description of the drawings and it is the description of figure 7.

A Okay.

Q Are you there?

A I'm there.

Q It says, figure 7 is a view similar to figures 5 and 6 showing the principle behind the locking action for the assembly.

Do you see that?

A I do.

Q So figure 7, at least according to this,

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is intended to show the locking action for the assembly, right?

A Well, yeah, it is showing as it is opening. It is just showing -- my view reads -- let's see. It shows the principle behind the locking action. So it is explaining, see how it looks -- 5 and 6 are essentially -- 5 shows it as if you were carrying it, so the lug is biased to the front which keeps it closed.

Figure 6 you are starting to move the handle and you can see the lug moves to the right in the channel, but it hasn't opened yet. Do you remember I discussed how due to the tolerances it may not be in contact, the lug may not be in contact with the slot? In that situation there, the closure hasn't opened. Where am I going. Now if you are going to figure -- let me get to 7.

I'm sorry, I was looking in my report which doesn't have figure 7, I apologize. So it starts with 5 it is closed and then the cap starts to come up in figure 6. Oh, 7, shows if you -- I see, that's right.

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Q So yeah, could we go in the reverse? Could we go from 7 to 6 to 5 and describe what happens? Specifically my question is this.

So going from figure 7 to 6 to 5, is that showing the action of the user pushing the handle and lug into a locked position shown in figure 5?

A Well, you have got to be careful, the arrows in figure 6, you can't go from 7 to 6 to 5, because that one would imply that you are slightly open in figure 7, and you are pushing the handle rotating it to the left, then immediately going to figure 6 and rotating it to the right.

Q Sure, fair enough. Let's go from figure 7 to figure 5 then, okay. And so if the user pushes the handle from figure 7's position to figure 5's position, they have -- they have locked the handle and lug into place in figure 5; is that correct?

A Let's see. It could be, but you could also go from figure 7 to 8 and 9.

Q And so --

A Show how it is locked in the stowing position, so it could lock shut.

Q Okay. So going from figure 7 to figure 5, is the lug moving up and to the left over what Samartgis calls the kink?

A That's correct.

Q And again the purpose of the kink is to bias the position of the lug to the position shown in figure 5, right?

A Right, under the weight of the bottle.

Q Now, Samartgis doesn't show a position between figure 7 and figure 5 where the lug would be at the top of the kink, but in that position there would be some tension created; is that correct?

MR. JENNINGS: Object to the form.

A Tension and between what and what now?

Q Well, let me phrase it this way.

Would the user experience some resistance in pushing the handle from figure 7's position to figure 5's position because of the kink?

MR. JENNINGS: Object to the form.

A Samartgis describes the kink as helping to keep the lid shut -- closed so the user would see

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resistance doing that.

Q And as we just read in column 2 at line 27, Samartgis calls this the locking action for the assembly, right?

MR. JENNINGS: Object to the form.

A He calls it locking action. I don't think he is calling it the locking position, but he says that it is the locking action.

Q And then if you go back to column 2 of Samartgis at line 25 he describes figure 6, are you there?

A Yes.

Q And it says figure 6 is a view similar to figure 5 showing movement of the leverage of the disengaging position?

A Correct.

Q So if we go back to figure 6, it shows the user has moved the lever to the right such that the lug has traveled to the right over the kink to what Samartgis calls a disengaging position, correct?

MR. JENNINGS: Object to the form.

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A He calls that disengaging position, correct.

We're just about an hour and a half. If there is a convenient time to take a break.

Q Okay. Give me one second.

So when Samartgis refers to figure 6 as showing a disengaging position, Samartgis is referring to the fact that the lug has disengaged from the position shown in figure 5, correct?

MR. JENNINGS: Object to the form.

A I think he talks about that in a little more detail. Actually I don't recall him talking about that in any more detail. I mean, it wasn't a point of my focus since the claims really don't talk about locking positions when it is -- when the closure is closed but --

Q Do you have an understanding when he describes figure 6 as being a disengaging position what figure 6 position is disengaged from?

A He only talks about figure 6 with any specificity. I think they're in column 2. I don't see him discuss figure 6 anywhere else. So

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all I can go by is what he says in column 2. Figure 2 shows more in disengaging position.

Q So you are not able to --

A I'm sorry, we would have to assume figure 5 is in the engaging position.

Q Okay.

A But I don't think he says that either about figure 5. He discusses figure 5 to 9 as showing the principle of operation.

Q Would it be your understanding that figure 6 is showing the lug disengaged from the kink --

MR. JENNINGS: Object to the form.

Q -- as compared to figure 5?

A I would say that the lug is no longer on that kink area.

Q So you would say in figure 6, the lug has been disengaged from the kink?

MR. JENNINGS: Objection to form.

A It is outside -- it is outside the area of the kink. It could be in contact with something else or not. He is not really specific, but that appears to be figure 6 outside of that kink area.

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I mean, it still could be in contact with the closure. It just doesn't seem to be in that kink area.

Q Okay, thanks. Why don't we go ahead and take a break.

(Recess, 12:19 to 1:02 p.m.)

Q Welcome back, Dr. Vallee.

If you could, please turn to column 3, line 58 of the Samartgis reference, Exhibit 1004.

A 58. Okay, I am there. Okay.

Q Okay. At column 3, line 58 it says, as shown on the drawing, a track 23 of the arm member 22 includes a number of specific elements or sections.

Do you see that?

A I do.

Q We've been discussing some of those specific elements or sections of the track, right?

A That's right.

Q And it says the first of these is a disengaging ramp section 25 sited closest to the cap member 21, which ramp section 25 in use allows

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the flap member 20 to lift in an upward direction so as to disengage the seal from the spout or neck 4 of the main body member 1.

Do you see that?

A I do.

Q And then the next ramp section is a track or flap which allows track member 20 to swing away from and return to engagement with the spout or neck 4 with the main body member 1. And then it says, next there is also included an anti-tamper ramp 26, which allows the lever member 10 to continue and lock the flap member 20 in place should the flap member 20 be snapped closed by action directly thereon.

And then the very last sentence, this is at column 4, line 3 it says the fourth section is a locking ramp and interface section 27.

I want to ask about that section 27, which Samartgis calls the locking ramp and interface section 27. If we could look at element 27 in figure 5.

A If I could just take a quick second to

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read once more where we were, because I think you skipped a section there someplace.

Q Sorry, I didn't mean to do that.

A No problem, I just want to go through it. (Reviewing document.)

Okay, I'm all set, thank you.

Q Okay. I would like to ask about what Samartgis calls the locking ramp and interface section 27 as shown in figure 5?

A Okay.

Q What is your understanding of the function of the locking ramp and interface section 27?

A I believe that when you are closing the lid is where you begin to start compression of the cap against the spout. Let me read that one more time just to be sure.

I believe that is what 27 does, because it is on the bottom surface of the slot. And if you were closing it will come in contact with that, if you are opening it wouldn't necessarily.

Q So if you are moving the lug from the locking ramp and interface section 27 to the left

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such that the lid is going to the closed position, is that ramp moving the lug into a locked position?

A Well, I think it is moving the cap, the closure into the locked position forward. I don't think it says anything else about 27, no, so that is what I believe it does.

Q And again, the purpose of the locked position of the closure is to prevent unintended opening of the lid, right?

A Yeah. I think we discussed that he talks really about two locked positions. This one is the forward, where he keeps the -- he keeps the cap shut as opposed to where it locks toward the stowed position. And again, I didn't focus too much on the lid closing only because there really weren't any claims that relate to that in claim 5, I think.

Q I believe you already testified earlier that if the user is moving the lug from the ramp 27 to the positions shown in figure 5, there would be some resistance to that movement, correct?

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MR. JENNINGS: Object to the form.

A Yeah. I believe I testified that there could be resistance and, of course, we were discussing the kinked region I think.

Q Yes. And likewise, if the user were to move the lug from the position in figure 5 to the right to the ramp 27, there would similarly be resistance; is that correct?

A Yes. As you -- as you moved it from the left to the right, you most likely still would be in contact depending how the -- how the cap and the seal is designed. And Samartgis, the seal is designed to be compressed, so within the conical taper of the interior of the spout. So as it decompresses until it is fully decompressed, you would still feel some resistance although it would be less in that direction than you would as you take it.

Q Okay. If you could, please, turn to page 57 of your declaration, Exhibit 1003?

A I am there.

Q And in the very first line you say the

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lugs retained the closure in a stowed position relative to the handle when the user removes the closure from the drink spout and moves lever 10 into the locking position to maintain the closure in the open position.

Do you see that?

A I do.

Q So I believe you already testified to this earlier. That in your opinion, the stowed position in Samartgis is what is shown in figure 9, correct?

A Yes, I believe that's what I said, stowed is figure 9.

Q And you also referred to that stowed position in figure 9 as a locking position as well, correct?

A Correct.

Q And you just testified a moment ago in your opinion there are -- there are two different locked positions in Samartgis, correct?

A I believe I said the former discussion was locking in the stowed position and we discussed

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where that was in Samartgis as well. And you could lock the cap in the closed position. That was in -- I'm sorry, just looking for one item here. I think he says this was locked in the stowed position.

Q I will represent I don't believe Samartgis uses the term stowed position, but if you want to confirm that you are welcome to.

A Yeah, or he may have said locked in an open position, I forget. We had discussed that earlier.

Q But either way I think you testified a few minutes ago that in your opinion Samartgis has two locked positions, one shown in figure 5 where the cap was closed and one shown in figure 9 where the cap is open; is that right?

A Yeah, I was -- we discussed earlier column 4 right around line 25 similarly talks about figure 8 and figure 9. So as I look at these drawings, there are -- and I will refer to figure 9 versus figure 5, okay. It can be in a locked position when it is opened and I think it could

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also be locked when it is -- when it is closed fully.

Q So that is correct, then, that in your opinion there are two locked positions in Samartgis. One shown in figure 5 in the closed position and the other shown in figure 9; is that right?

MR. JENNINGS: Object to the form.

A Yes, there is a locked position in figure 9 and similarly where the kink is in figure 5 and figure 9 it locks to retain it in -- in the -- what we're calling the stowed position.

Q Now, while there is a kink at the left end of the track that we've just been discussing Samartgis doesn't depict or describe a kink at the right end of the track, correct?

MR. JENNINGS: Object to the form.

A Well, it depends on how you hold the picture. If you look at -- if you look at figure 8, for example, let's start there, you have a ramp section, I forget what he called that. That would be in figure -- okay, I'm sorry, let's go to

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figure 3.

If you look at the closure in figure 3, you can see at the left there is -- what he calls a kink, there is a distinct change in direction of the slot there. And then if you look to the right, you can see how it bends down when there is another change in direction.

It shows a similar thing in figure 8. I don't think he calls it a kink, but it is definitely -- it is definitely a change in direction, which helps you to stow the handle so it is not in transition, for example.

Q So in your opinion, figure 3 shows a kink at the right end of the track?

A Well, he doesn't call it a kink, but it is similar to his described kink in that it goes from a ramp portion and then it changes angle. And in figure 8, for example, starts even down again to help you lock in a position and maintain it there.

Q He doesn't label or describe any separate section or element corresponding to any kink on the right side of the track, correct?

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A Well, again he doesn't use the term kink but it is clear to me what it does. See, the reason if it didn't change angle there when you rotated the handle to the right, if that didn't change angle, you would be in a continually tightening position. And it wouldn't be constant, which means it would tend to want to spring back to the open -- to the closed position. But by putting that there, it allows it to settle, so there is no reaction force that's trying to close it again.

So he doesn't call it a kink, but I think that is another change in geometry to allow you to stow it. And it continually bends away -- bends in a concave fashion, so that when the lug is all the way to the right, it is retained there and it won't want to spring back. Without that, there is nothing to stop it from moving -- from moving back to the -- toward the closed position, so you wouldn't be able to keep it open.

MR. MUDD: Susan, could you read back my last question, please?

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(Record read.)

A My answer was he doesn't call it a kink, but he does show in figure 8, and I believe it is 7 as well and other figures how there is that change in geometry, which is somewhat similar to the kink he does describe. So he didn't use the word kink, no, but it shows it in four of these figures.

Q So Samartgis doesn't use the word kink or assign that change in geometry you are referring to with any separate reference numeral in the figures, correct?

A Correct. And that doesn't surprise me, because when you understand how these -- these handle locks work, when you see the taper going downward you understand that that is what holds it open, but he doesn't use the word kink, you're correct.

Q When the user starts from the position in figure 9 that you called the stowed position and pushes the lever to the left, does the user experience any kind of resistance from that

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geometry in the track like the kink on the left of the track?

MR. JENNINGS: Object to the form.

A I believe they would, because of the shape of it. As soon as you start rotating it up, it is going to start pushing it shut again. So it would -- you would feel resistance.

Q Figure 9 doesn't show a fully open position of the cap in Samartgis in your opinion, does it?

A Well, it is the open most position. I don't think these figures are designed to -- and I don't think Samartgis tries to explain how open, in his opinion, it needs to be, but it is the open most position that he shows. I don't think there is another figure that shows anything open to a larger extent, but you could -- I mean, based on his teachings, you could design this to be as open as you feel it should be.

For example, you could take on the closure, which is the arm, which is the flap basically. You could design the cap 21 to be at

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an angle and you could -- you could keep the slot in the same configuration just angle the cap upward. So you could design whatever openness you see fit, but he doesn't go into the details of the design to that extent.

He just explains to me how you can have this design that allows you to close it and how it allows you to stow it.

Q In your opinion, could a user comparably drink from the bottle with the cap in the configuration shown in figure 9?

A Sure, you could. I mean, comfort is a relative thing. It may be comfortable for one person and not another, but again, he's trying to demonstrate, you know, when is it locked in the open, when it is in the shut position, et cetera.

Q If you were drinking from the bottle in the position with the cap in the position shown in figure 9, would you prefer for the cap to be more open before you drank from it?

A Well, I mean, I think you would have to show me the whole design of the bottle, how the

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cap fits on and where it is relative to my mouth. Is it a large bottle, a small bottle, is the neck of the bottle smaller than the rest of it. I mean, something like that whether I think it would be comfortable I'd need to actually see a design.

Q Well, we have the full design in the other figures, right?

A Well, you don't have the whole bottle on it. I mean, the configuration of the bottle can affect how you hold it. It can affect what angle you can tip it at. That is why I don't think he goes into more detail on how open is open. He's trying to teach you how to go from the closed position to how you open it. It is up to you how far open you feel it needs to be.

Q If you could, turn to figure -- let's use figure 3 of Samartgis.

A Okay.

Q Do you see what Samartgis describes as the -- one second, let me get the exact term, U-shaped section 11. So let me -- let me phrase the question.

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Do you see in figure 3 what Samartgis calls the U-shaped section 11?

A I do.

Q What is your understanding of the purpose of the U-shaped section 11?

A That allows the user to carry it if the finger isn't there and carry the water bottle.

Q Is the U-shaped section 11 designed to allow the cap to pass through that section?

A Well, it allows the flap to be contained in that section and the cap is part of it. The closure is the whole -- is the arm and the cap and as we discussed before the seal, so that is contained within it.

In fact, I can also add that part of the purpose of that U-shaped section is to retain the lugs. So the lugs are connected to the inside of that section, but the closure definitely fits -- fits inside, inside the U.

Q So the closure fits inside the U-shaped section 11?

A Well, a portion of it fits in there.

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Q So a portion of the closure fits inside of the U-shaped section 11?

A That's right. In fact, I show that -- well, it is shown in several places. I don't think I need to refer to it.

Q I think also, if you could turn to column 3, line 47.

A 3, line 47 was it?

Q Yes. Are you there?

A Okay.

Q It says, the flap member 20 further includes at or in the vicinity of the free end of the arm member 22, opposed lugs or the like protrusions 24, which in use are adapted to be located in apertures 7 of the main body member 1 whereby to allow for releasable connection there between.

Do you see that?

A I do. If I could just get a little context before that, see what he is talking about.

Q Yeah, specifically I want to ask about protrusions 24 and apertures 7?

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A I believe this he's talking about figure --

Q I believe it is both figures 3 and 4. So I will represent for you that the apertures 7 are labeled in figure 3 and actually why don't we just use figure 4. They're both labeled in figure 4.

A Thank you, I appreciate that. As soon as I find figure 4, there it is.

Q So in figure 4 do you see the protrusions 24 on the flap and the apertures 7?

A I do.

Q And based on that description we just read, is it your understanding that those protrusions 24 are designed to be positioned in the apertures 7?

A That is also correct.

Q And by positioning the protrusions 24 into the apertures 7, a hingelike arrangement is created; is that right?

A Yes, and an axis of rotation between the arm and the body there.

Q Okay. Now, I want to go back to figure 9.

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In figure 9 if the user continues to push the lever 10 in that downward direction shown, the flap member will open further rotating about that axis of rotation formed by protrusion 24 and apertures 7, correct?

A Well, that is hard to say, because you need to -- he doesn't show it and I don't believe he discusses it, but to determine whether or not it rotates farther, you would have to actually analyze the kinematics to see if the rotation of the handle about its -- that is fixed on, I will call it pin 3, okay.

You have to see if having the arm pivoted at that point there. 7 we just discussed about that. You have to see if it actually can rotate farther. You can't really tell from the figure and I don't recall him discussing any further rotation, you can't really tell.

Q Figure 9 depicts a downward force being applied past the position shown in figure 9; right?

A Well, is that a force or a -- if it is a

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force, you can have a force without motion. It all depends on -- I don't believe he discusses the arrows. I think he just says -- shows A, B or C.

Q But in figure 9 the lug is offset from the axis of rotation formed by the protrusion 24 and apertures 7, correct?

A Protrusion, I'm sorry, could you ask the question one more time? I finally found my figure.

MR. MUDD: Yes, could you repeat it, please, Susan?

(Record read.)

Q So in figure 9 the lug is offset from the axis of rotation formed by protrusion 24 and apertures 7 such that the flap member will tend to rotate about that axis of rotation, correct?

MR. JENNINGS: Object to the form.

A I'm not sure. When you say offset from axis of rotation, did you mean offset from axis 24, is that what you are calling the axis of rotation?

Q Yes.

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A So the lug is offset, but that doesn't guarantee that it will be able to rotate any further. Again, you have to analyze the kinematics. It could bind in that position. Generally what I do it is I take all the dimensions and I do a kinematic analysis to make sure that you have free notion and rotation when you -- if you try to get past that point depicted in figure 9. You really can't tell, and without a description in the specification, you can't tell if that rotates any further. It may, but it really doesn't say specifically that it does, I don't believe.

Q So looking back at figure 4, and feel free to refer to figure 3 as well if necessary, there is no structure in the cap assembly of Samartgis to prevent the flap itself from continuing to rotate about that axis of rotation past the position shown in figure 9, correct?

A Well, again, we really don't know. The fact that, you know, he refers to locking in the position in figure 9, tells me that that could be

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the farthest it goes. To verify it, I would have to do an analysis, but to me it looks like, you know, you rotate it to where in figure 9, and you may be able to go a little farther, but that is basically where the motion would stop. But without the -- without analyzing a design, he doesn't teach you enough to tell you whether that is true or not.

Q In your opinion, would it be desirable for the flap to be able to move farther to the right from the position shown in figure 9?

A I mean, again depending on the design of the whole product and what you are going to use the cap on it could be -- it could be undesirable. It depends on, you know, what the -- what the consumer is looking for and how it should function and perform while it is assembled to whatever liquid container it is attached to.

Q Since the lug is offset from the axis of rotation, and since there is no other structure in the cap assembly shown to stop the flap member from continuing to rotate farther to the right

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about that axis of rotation, it is certainly possible in Samartgis that the flap member could do so; is that correct?

A You are talking about lugs 24 as opposed to lugs 15 and 16, I assume, correct?

Q I'm talking about the same element 24 we've been discussing, the protrusion 24?

A Okay. I'm sorry, you just said lugs. I want to confirm you are talking about lugs 24.

MR. MUDD: So Susan, could you read back my last question, please?

(Record read.)

MR. JENNINGS: Object to the form.

A When you said lug offset from the axis of rotation, the lug is the axis of rotation. I think I'm confused.

Q No, the axis of rotation we've been discussing is the protrusion 24 rotating within the apertures 7. The lugs 15 and 16 is part of the handle?

A Right, right.

Q That is offset from the axis of rotation?

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A Okay. You are talking about the axis of rotation of the closure, okay. So would it be possible.

MR. MUDD: So, yes, could we read that question back?

(Record read.)

A There is what got me confused. You said the lugs 24 are offset from the axis of rotation, which is 7, but it is on the axis of rotation. Am I misunderstanding your question?

Q So let's keep the terminology straight. So there is the lugs 15 and 16 and then we will call it the protrusion 24 --

A Okay.

Q -- to distinguish the terms, okay?

A Yes.

Q So since the lugs 15 and 16, you already testified earlier that the lugs 15 and 16 are offset from the axis of rotation formed by protrusion 24 and apertures 7, correct?

A I'm with you, correct.

Q Okay. So since the lug is offset from the

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axis of rotation and since there is no structure shown to prevent the flap from continuing to rotate to the right about that axis of rotation, then it is certainly possible that it could continue to rotate to the right from what is shown in figure 9?

A Well, I don't think that is correct, because in figure 9 it looks like the lug 15 and 16 has gone as far as it can. I think that is why he refers to what is a locking position. And again to verify, you would have to do a kinematic analysis to see if there is an interference, but when I read this one, when I look at figure 9, I think he includes that because that is as far as it goes.

Q But even though the lug has gone as far as it can go within the track, the lug can still apply force to the flap member 20 via the right wall of the track, correct?

A Well, it may be able to apply force. It doesn't necessarily mean it is going to rotate any further if it is locked up and it can't go any

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further.

Q How is it locked up if the lug is offset from the axis of rotation and there is no structure to prevent that rotation from occurring?

A Well, the structure would be the right side of the groove, what it finds in the groove, because you have two different axes of rotation here. You have the axis of rotation of the handle itself, which is -- you can see that at the bottom, we will stick with figure 9, that is like, I will call it lug 3 or pin 3. So that is its axis of rotation with respect to the bottom of the cap, I'm sorry, the bottom of the assembly, the base.

Then you have a second axis of rotation which are those tabs 24 that fit in the recesses 7. So you have two axes of rotation and you can design it so that you get an interference. So the way we do it in kinematics is we would draw offsetting radio lines from each axis of rotation to see where the intersection is.

And if you simply design the position of

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the lugs 15 and 16 in the proper position, it will just lock up. You won't be able to move it anymore. And I read Samartgis to say that this is the rightmost position, because he doesn't speak of any one any farther and he refers to it as a locking position.

Q So is it your opinion, then, that it is possible figure 9 is as far as the cap can open?

A It could be. I don't think Samartgis calls it a locking position, but he doesn't go into anymore detail than that. It could be.

Q It is also possible in Samartgis that the cap could move to a position farther to the right that is more open as well, right?

A I mean, without performing analysis I couldn't say. I take the context of a specification and that tells me that that is probably as far as it goes. And he calls it a locking position, so I think that is in Samartgis, where the lug meets the end of the track is the end of the story.

Q And it would be easier to drink from the

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bottle if the cap could move farther to the right, correct?

A Again, it depends on the design of everything. And he doesn't discuss degrees of comfort or how easy it is. He is just talking about closing it and opening it. And the designer would be free to make whatever choices are necessary to separate the cap 21 from the spout pour as much as they like, but that is not what he's trying to teach in here.

I think he's just trying to teach a mechanism that allows you without touching the cap to open and close the closure and keep it in the stowed position. A stowed position is at or very close to figure 9, as depicted in figure 9.

Q Samartgis suggests that the user can apply force directly to the cap to close it, independent movement of the handle, correct?

A Could you direct me to where he says that, I don't recall that.

Q Yeah.

A The purpose of the invention is for a

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device that prevents you from having to touch the cap for sanitary reasons, I think is how he explains it.

Q Yeah. So if you go to column 5, line 56.

A I'm just going to read some of this, please. (Reviewing document.) Column 5 did you say 56?

Q Hang on. Yes. Are you there?

A Yes. So the sentence starts with there is also included?

Q Yes.

A Okay.

Q It says, there is also included an anti-tamper ramp 124 which allows the lever member 110 to continue and lock the flap member 120 in place should that flap member 120 be snapped closed by action directly thereon.

Do you see that?

A I see it.

Q Do you understand that to be referring to the user acting directly on the flap member?

A It doesn't say that. It just says if it

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is snapped closed somehow, continue to lock the flap member in place should that flap member be snapped closed.

Q So by action directly on the flap member to snap it closed, would you understand that to be some force applied directly to the cap as opposed to its arm?

A I have to think about that. This is the next embodiment, so this must be referring to figure -- this must be referring to figure 12. Anti-tamper ramp 124, yet when I look at figure 12, 124 is the tab that is inserted into in this embodiment --

Q What page --

A -- there.

Q It looks like 124 is likely mislabeled, you agree?

A I think it is probably mislabeled, because it calls it a ramp. In the previous embodiment the ramps were in the 20s, those numbers. Yeah, I think that is mislabeled.

Q What if we turn to the prior embodiment we

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were discussing, so this would begin column 3, line 66. And it says, there is also included an anti-tamper ramp 26 which allows the lever member 10 to continue and lock the flap member 20 in place should that flap member 20 be snapped closed by action directly thereon.

Do you see that?

A I do. I mean, it could be struck by anything. Closure could be of a flap, would be closed by anything. I think what he is saying here is if you're in that position of -- what does he call it ramp, section 25 I think it is.

Q Yes.

A Section 25, if you are in 25, you wouldn't be able to close it all the way. So you're close to what is shown in -- closer to what is shown in figure 6. I think that is what he's -- what he's discussing here.

Q But if you're in the position shown in figure 9, the user could apply force on the cap 21 to close it, correct?

A If you are in the configuration of figure

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9.

Q Yes.

A No, you wouldn't be able to close it not without rotating the handle.

Q What is preventing the cap from rotating about the lug to close?

A Well, let's assume figure 9 is what I have been calling the locked position. In the locked position in figure 9, I don't think he would be able to close it.

Q What is preventing it from closing?

A The lock, the lugs 15 and 16 would maintain it in that stowed position. But if you are not in that position, if you are in the position of figure 8 I believe, where the lug is in that section 25, then you wouldn't able to close it any further. That is what he's talking about in column 3, that last paragraph.

Q So it makes sense to me that in figure 8 the user couldn't apply force on the cap 21 to close it, because the lug is in the middle of the track, but in figure 9, the lug is at the far

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right end of the track such that the user would be able to push the cap closed, correct?

MR. JENNINGS: Object to the form.

A No. I believe I said figure 9, neither in figure 8 or 9 if you don't move the handle. If you hold the handle fixed, just based on these figures alone without dimensions, you wouldn't be able to close the cap manually, but the whole idea of the invention is that you don't need to touch the cap to manipulate. You simply move the handle to open and close the cap.

Q So going back to that sentence we just read in column 3, line 66. It says, there is also included an anti-tamper ramp 26, which allow the lever member 10 to continue and lock the flap member 20 in place should the flap member be snapped, closed by action directly thereon.

Do you see that sentence?

A I see the sentence, but I'm looking for the figure that has anti-tamper ramp 26.

Q So I will represent to you there doesn't appear to be any item labeled 26 in any of the

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figures, but I will let you confirm that.

A He calls 25 -- he calls 25 this engaging ramp. What I was talking to could have moved into that intermediate position in figure 8 I believe it was, that appears to be in that position 25.

Q But there is no position 26 labeled in the figures, right?

A No, I may have mistaken in our discussion anti-tamper ramp with 25, 25 is not that. So I will agree with you that I don't see 26 in any statement. So all we can go by is the text, so there was also included somewhere, I guess, an anti-tamper ramp 26 that allows the lever 10 to continue to lock the flap member in place should the flap member 20 be snapped closed.

Q Would you understand that sentence to be referring to the scenario where the user directly themselves snaps the flap member closed on the drink spout but then subsequently pushes the lever all the way to the left to lock it into position?

MR. JENNINGS: Object to the form.

A Well, I think all we can do is go by what

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it says. That whatever that ramp is, it allows the handle to keep the flap locked in place, which I take to mean the open -- the open position to the flap member be snapped closed, so whatever it is.

Q So it wouldn't be opened, it would be closed, right?

A Well, I read this to mean it continues to lock the flap member in place, the open position.

Q No, no. It continues to lock it into place once it is already closed, right?

A It continues to lock the flap member in place should that flap member 20 be snapped closed. It is already closed, why is he dealing with it being snapped closed?

Read it one more time, the anti-tamper ramp that he doesn't show -- that is the problem, he doesn't show it. Allows the lever member 10 to continue to lock the flap member 20 in place should it be snapped closed. So how can it already be closed if it is locking it in place and then assuming it prevents it from being snapped

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closed. That is the way I read that.

Q So try this Dr. Vallee. Do you think this sentence could be referring to -- strike that.

So do you think that the anti-tamper ramp 26 could be the ramp at the far right of the track?

MR. JENNINGS: Object to the form.

A Without that there it is difficult to determine whether that is or not. That is the only explanation we have. I don't see 26 cited anywhere else. I think he says the same thing in the later embodiment.

Q Would that sentence make sense to you if it was referring to the scenario where the user themselves directly closes the cap and then moves the lever from the position shown in figure 9 to the position shown in figure 5?

A Without clarification on what he's talking about with 26, that is difficult to say.

Q Would you have an alternate explanation for what it could be describing besides that?

A Well, again, I'm not -- I'm not confident

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in what he's trying to say without that illustration. I mean, that is difficult to say, but it is -- that could be as I was describing the shape of the -- of the slot, when it is in what I call the stowed position, that could be the explanation that tells us why it is, in fact, the stowed position, because it is all the way to the right and he calls it anti-tamper. So it keeps it locked in that position. And that is -- that is to keep it there would be my assumption.

Q If you could please turn to paragraph 101 of your declaration on page 56?

A Okay, 101, I'm there.

Q And is it your opinion that the lug members 15 and 16 of Samartgis are equivalent to the tabs 56 in the '252 patent?

A Yes, it is. It is the first sentence equivalent to the corresponding structure of the '252, which is the two or more spaced-apart tabs, yes.

Q And if we could turn to figure 7 of the '252 patent and I think we've already discussed

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this previously, but the tabs 56 are shown in figure 7 of the '252 patent; correct?

A I believe I have that in color for my declaration, so...

Q Yeah, we can use that version.

A That is nice and big.

Q Yeah.

A At the beginning of that section, I believe.

Q I think it is in the summary of the prior art, I will get it or sorry, no, it is in the summary of the patent?

A It is on page 25.

Q Yes, I found it.

A Under paragraph 48.

Q So on page 25 of your declaration it has the annotated version you prepared of figure 7, correct?

A Correct.

Q And as shown in figure 7, when the closure 20 is in a closed position to seal the water bottle, it is not in contact with the tabs 56,

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right?

A In that figure -- in that figure it is not.

Q In other words, the dark blue is not in contact with the pink, right?

A That's right. And claim 5 doesn't say it can't be, but you are correct, in that figure they are not in contact.

Q There is no figure in the '252 patent that shows the closure 20 in a closed position where the closure 20 is in contact with the tabs 56, correct?

A That is correct.

Q And for figure 5 of Samartgis, the lugs 15 and 16 are in contact with the track 23 of the flap 20 when it is closed, right?

A Get back to figure 5, so your question again?

Q In figure 5 of Samartgis, when the cap is in the closed position, the lugs 15 and 16 are in contact with the track 23 of the flap 20, correct?

A That's true. Again, claim 5 doesn't

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really say where are the lugs in the fully closed position to be in contact with. They just really, claim 5 just the last element just talks about when it is in the stowed position. But to answer your question, yeah, that is correct.

Q So that is one difference between how Samartgis's lugs 15 and 16 function as compared to the '252 patents, tabs 56, correct?

A Well, when you -- when you say function, that to me says we're going to talk about the function in the claims. As far as the claims go, they function exactly the same. The function is the same in the stowage and the last element of claim 5 is in the same way and you have the same result. So as far as the claims go, the only function that is discussed is in claim 5, for example, where it talks about the closure retention mechanism when it is in the stowed position.

Q Let me rephrase the question. So there is a difference between the position of Samartgis's lugs 15 and 16 with respect to the closure in

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Samartgis as compared to the position of the tabs 56 with respect to the closure in the '252 patent, correct?

MR. JENNINGS: Object to the form.

A What I was trying to answer was that although it is not relevant in the claim language, and the claims don't require that they be exactly the same in that position, it is true that in that position the lugs in Samartgis contact the cap when it is closed.

Q So the lugs 15 and 16 in Samartgis contact the cap when closed, while the tabs 56 and in the '252 patent do not contact the cap when it is closed, correct?

A I'm sorry, I should have said closure, but yeah, that is what I answered although it is not defined in the claims in that closed position.

Q Okay. And Samartgis's lugs 15 and 16 play a role in helping open the cap in Samartgis while the '252 patents tabs 56 do not, correct?

A Correct. And again, the claims don't require that they do not. There is nowhere in the

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claims where it said that that can't be the case.

Q So that would be a second difference between Samartgis's lugs 15 and 16 and the '252 patents tabs 56, correct?

A It would be an insubstantial difference with respect to the claims, but it is a difference.

Q The tabs 56 in the '252 patent allows the cap or closure to be engaged or disengaged with the handle, correct?

A In the '252 you are talking about?

Q Yes.

A No, they can be engaged or disengaged as in Samartgis. Samartgis can be disengaged as we discussed earlier, through the clearance, you could have the handle in a position that is not rearward, it is not really in contact, it could be. But to answer your first question, the cap in the '252 does not contact the tabs when it is fully closed.

Q And you already anticipated my next question. And that is with regard to Samartgis,

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the lugs 15 and 16 are always engaged with the track of the flap member 20, right?

A Well, again, due to the clearance it wouldn't move if it was always here. So it could be disengaged at different places along the path, right. If you had -- if you had the handle in, for example, in a mid position chances are you could rattle the cap a little bit and get some motion, because there has to be some clearance.

Q Let me try it this way. In Samartgis the lugs 15 and 16 always move within the track of the flap member 20, correct?

A That is correct.

Q So that would be a third difference between the lugs 15 and 16 of Samartgis and the '252 patent tabs 56, correct?

A Differences that aren't really substantive as far as when put against the claim, but they are differences, just not differences that matter with respect to the claim.

Q The '252 patents tabs 56 don't move in an upward or downward direction relative to the cap

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assembly of the bottle, correct?

A Again, it is a difference that is not called out in the claims. The claims don't talk about a motion of the lugs or the tabs with respect to anything.

Q Okay. Understood.

A It is a difference.

Q You are anticipating my question, two questions ahead. Let's -- let me just take them one piece a time and we will get to that, okay?

A Let's go back. That was --

Q So let me -- let me restate the question. So the '252 patents tabs 56 do not move up and down relative to the cap assembly, correct?

A Correct. And my answer was, it is a difference that is not important with respect to the claims. That is what my answer is.

Q But the answer to the question is, no, they do not move up and down relative to the cap assembly in the '252 patent, correct?

A That is correct.

Q In Samartgis the lugs 15 and 16 move up

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and down relative to the cap assembly, correct?

MR. JENNINGS: Object to the form.

A The lugs actually rotate with respect to the assembly.

Q So from figure 5 to figure 9, moving from figure 5 to figure 9, the lugs move in a downward direction relative to the cap assembly, correct?

MR. JENNINGS: Object to the form.

A Lugs rotate, I will say they rotate downward as you move from figure 5.

Q But they're translating at least somewhat downward in addition to rotating, correct?

MR. JENNINGS: Object to the form.

A No, that is a -- that is pure rotation. The whole rigid body rotates about one point, so that is not translation. General claim motion is translation plus rotation, this is just pure rotation, so there is no translation.

Q Relative to the surface of the cap assembly, is the frame of reference I'm asking about from figure 5 the -- the lug is higher vertically from the surface of the cap assembly

than it is in figure 9, correct?

MR. JENNINGS: Object to the form.

A That is correct.

Q And so the movement of the lugs 15 and 16 is another difference as compared to the tabs 56 of the '252 patent, correct?

MR. JENNINGS: Object to the form.

A Again, it is a difference that doesn't matter in view of the claims.

Q So we've just listed four differences between the lugs 15 and 16 of Samartgis and the tabs 56 of the '252 patent, correct?

A Correct, none of which matter in light of the claims.

Q Let's move to Leoncavallo. It might be a good time to take a break.

(Recess, 2:18 to 2:32 p.m.)

Q Dr. Vallee, if you could, I've put into the chat Exhibit 1005, which is United States Patent 7,753,240 to Leoncavallo.

(Exhibit 1005 marked.)

Q If you could take a moment to look at this

exhibit and confirm that you have reviewed it?

A The '240 patent, Leoncavallo, yes, I have reviewed this.

Q This is the Leoncavallo reference you have offered opinions on in your declaration in this proceeding?

A That is correct.

Q If you could turn to paragraph 173 of your declaration on page 100?

A Paragraph 173, okay, I'm there.

Q And in your opinion, Leoncavallo's detents 90 constitute the claimed closure retention mechanism in Leoncavallo; is that correct?

A That is correct.

Q And you don't rely on any structure other than detents 90 in Leoncavallo as satisfying the claimed closure retention mechanism, correct?

A That is correct.

Q And on pages 101 and 102 you have highlighted the detents 90 in figures 2 and 3 of Leoncavallo, correct?

A Correct.

Q And please turn to page 103 to the last sentence of paragraph 174 beginning with, in other words, are you there?

A I'm there.

Q It says, you state, in other words, Leoncavallo discloses that a user removes the closure, flip cap 68, from the drink spout and stows it relative to the handle by rotating the flip cap 68 into a position where it is retained in a stowed position relative to the handle by the frictional engagement of the connector member 80 with the detents 90.

Do you see that?

A I do.

Q I believe you have a color coded depiction of Leoncavallo, let me find it. Yeah, on page 35 of your declaration?

A That's right, figure 3.

Q And in this annotated version of figure 3, on page 35, you have colored the detents 90 pink, correct?

A That is correct. Well, I colored the box

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around the number 90, but --

Q And you have -- you have colored the flip cap 68 what you call royal blue or dark blue?

A That's correct.

Q And in your opinion, the connector member 80 is part of the flip cap 68; is that right?

A That's correct.

Q So the connector connecting member 80 and flip cap 68 are all one piece; is that right?

A Correct, that's why they're all in royal blue.

Q Okay. Is it your opinion that the stowed position of Leoncavallo is the open position shown in figure 3?

A Yes. I believe I describe that back in paragraph -- paragraph 174 on my declaration, page 102 where Leoncavallo discloses that detents 90 are designed to and do perform the claim function of retaining the closure in the stowed position, so yes, that is correct.

Q And in your opinion, figure 2 of Leoncavallo shows a closed position not a stowed

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position, correct?

A If we're referring to figure 2 on my page 34 where it is annotated, that is correct. That is in the closed position in figure 2.

Q So on that same page 35, in figure 3 the connecting member 80 itself never actually covers or closes the spout; is that right?

A Yeah, it is part of the cap, but it doesn't contact the spout, that's correct.

Q So the connector member 80 by itself is not a closure, right?

MR. JENNINGS: Object to the form.

A Well, the closure is the cap that is -- that is -- that is part of it. That is part of it, just like in the '252 patent. What they label as the cap doesn't contact the entire inside of the spout, for example, only a portion of it actually does closure.

But it is that component that is the closure and it is the same here, so that flip cap is the closure. It is in paragraph 65, for example, right below the closure includes a base

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made up of a circular shaped end wall 34 annular skirt wall, let's see. Paragraph -- well, no, not that paragraph. It is basically -- it is the cap, this closure is the cap.

Q And it is your opinion that connecting member 80 is part of the closure?

A Yes, that's right.

Q Okay. When the user rotates the cap from the closed position to the open position, do the detents 90 receive the closure when they first have frictional engagement with the connector member 80?

A Let's see, member 80 you said. So connector member 80 contacts the detent 90 as it starts rotating maybe 80 degrees or so. And when it is in the fully stowed position certainly detent 90 is in contact and received by the closure retention mechanism, but the closure is received by the closure retention mechanism when it is in the stowed position.

Q So in your opinion, the detents 90 don't receive the closure in Leoncavallo until the flip

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cap is in the open position shown in figure 3; is that right?

MR. JENNINGS: Object to the form.

A Again, they come in contact, receive would be in contact as we discussed earlier at whatever angle, once it begins to open at whatever angle they come in contact. More importantly that when it is in the stowed position, it is certainly received and that -- and you can see that in figure 3.

Q So I believe you testified that it appears that the detents 90 first come into contact with the connector member 80 when the flip cap is about -- has rotated about 80 degrees; is that right?

A Based on looking at the figure, I would say that is about right.

Q And when the flip cap has rotated about 80 degrees, it is not yet fully opened, correct?

A That's correct. It is not in the stowed position, yes.

Q So the connector member 80 contacts the detents before the cap is in the stowed position,

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correct?

A That is correct.

MR. JENNINGS: Object to form.

A That is fine with respect to the claims. All claim 5 indicates is that when it is in the stowed position it has to have been received.

Q You may have already said this, so apologies if you did, but when the -- when the cap has rotated about 80 degrees and the detents first come into contact with the connector 80, the cap is not yet in a stowed position, correct?

MR. JENNINGS: Object to the form.

A Yes, that is what I said, I believe.

Q Do you know are Leoncavallo's detents 90 capable of holding the flip cap 68 in a partially opened position above the skirt wall 36 when those detents come into contact with the connector member 80?

MR. JENNINGS: Object to the form.

A Leoncavallo doesn't discuss, as I recall, whether or not it does, not to my recollection. I think he focuses on the full open position. And I

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would say if you look at figure 3 when it is in the full open position, I note that the wall thickness of that Section 80 is thicker where that contact occurs between 80 and 90 indicating it would be stiffer. And that would be the position in the full open position where you would get the greatest degree of retention, and that is why I believe that is the stowed position.

Q So in your opinion, there is greater friction between the detents 90 and connector member 80 in the fully open position shown in figure 3 as compared to a partially opened position where the connector member 80 is in contact with the detents 90?

A Yes, I believe so.

Q Do you know whether the friction between the detents 90 and connector member 80 in the -- in the open position shown in figure 3 is sufficient such that if a user were to drink from the bottle in this configuration, that the flip cap would not rotate and, you know, hit the user in the face?

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MR. JENNINGS: Object to the form.

A If I go to Leoncavallo, and again, I ask if you'd just bear with me here while I find what I'm looking for. Oh, let's see.

Q I think I may know what you are looking for. Is it the reference to using the word aid in keeping the flip cap in the open position?

A If you can direct me there, that would be a help.

Q Yeah, column 5, line 39, are you there?

A I'm there, I'm reading, thank you.

Q Okay.

A Yeah, that is all he says. Frictional engagement of the detents 90 with the connector member 80 aid in keeping the flip cap in the open position when user desires access when figure 3 is in the open position. And so that tells me that it keeps it open when it is in the open position.

Q But that sentence you just read in column 5 from lines 39 to 42 doesn't say whether or not the friction would be sufficient to prevent the flip cap from rotating to where it would hit the

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user in the face, right?

MR. JENNINGS: Object to the form.

A It says it helps keep it open. That to me means, you know, in use it won't close. That is what helps keep it open. If it doesn't have any help, it won't stay open. That is the way I read it. I mean, the purpose is to -- the patent I think is largely to have a closure with a handle that stays open conveniently right. I'm on the patent -- I'm on, let's see, let me find the right spot in the column, column 2.

Q So if I ask you another question about that sentence we just read in column 5, lines 39 to 42 when it says the connector member aids in keeping the flip cap in the open position, that means the connecting member helps in keeping the flip cap in the open position, correct?

A Correct. If you read the entire specification in its entirety, it tells me that that is what keeps it open. I mean, I don't think -- so at least someone can drink from it without, as you said, get hit in the nose.

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He doesn't say that this will keep it open when any force is applied, but I think it is pretty clear when I read the whole thing that this is designed so you can put your finger in a convenient loop. The cap, you don't lose the cap, you can easily close it or you can open it.

I don't see where the invention would be nearly as useful if it didn't have enough retention force in the open position to keep it open. I mean, then why put a detent there. If your intent is not to help keep it open or keep it open, why even have the detent. It doesn't make any sense to me if you were to design this and not have enough force so that when you opened it it stayed open. I think it is understood that in the open position the detent helps it stay there, so it doesn't spring back on you.

Q And so is it your opinion the detent is intended to keep the cap open regardless of the angle at which the bottle is oriented?

A Yes, I think that is common sense that if you read the whole specification that is what he's

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trying to do among other things, that that should keep it stowed. I don't think you would sell many of these if it didn't do that. It would be annoying hitting the nose every time you flip it open.

Q Kind of how it would be annoying in figure 9 of Samartgis if you get hit in the nose when you try to drink?

A Well, Samartgis never claims that is the most fully open position. He looks at it and he explains that as open, but he doesn't go into that. That is -- and again, there is nothing to indicate that it would close on you. Our discussion was based on the fact that it would close intermittently, and then you get hit in the nose. Samartgis is designed to keep it open when it is in the locked position and the open position, so I don't think they're analogous at all.

Q So looking at figures 2 and 3 of Leoncavallo, Exhibit 1005, both figures depict what is called a loop member 54, right? I'm

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sorry -- yeah, 54?

A That is correct. I put that in, I believe that is orange, at least on my copy it is.

Q Yeah, is that -- so you're in your declaration on page 35 and 34?

A Correct, that's right. I will call it orange.

Q Okay. Yeah, you label loop 54 in orange and figures 2 and 3 on pages 34 and 35, correct?

A Agreed.

Q And the loop 54 has a closed perimeter within it where the orange loop interfaces with the white space interior of the loop, correct?

MR. JENNINGS: Object to the form.

A The loop I guess you could say interfaces. There was -- the loop is hollow, and I forget if it is item 58 I think it was maybe the opening, but it is hollow. So the white area is hollow where there is no material. Does that answer your question?

Q Yeah.

A I'm not sure I --

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Q That's right. Leoncavallo calls 58 opening 58?

A Okay, yeah.

Q So there is a closed perimeter defined by the loop 54 where it meets the opening 58, right?

A Yeah, that would be the interior maybe 56. Let me just check that out.

Q Tubular wall 56, right?

A I believe that is 56.

Q And in paragraph 179 of your report on page 106, you label this closed perimeter in yellow, correct?

A Paragraph 176 was it?

Q 179.

A 179, let's get there, okay.

So Leoncavallo discloses the loop 54 as a closed loop in the form of a cylinder that is generally circular, cross-section in shape. Okay, I'm there.

Q And you state in the next sentence in paragraph 179 that the figures make clear that loop 54 defines a closed perimeter and you

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highlight that closed perimeter in yellow on that page 106, correct?

A Correct.

Q Now, the flip cap 68 doesn't ever enter the perimeter defined by the loop 54, correct?

MR. JENNINGS: Object to the form.

A Correct. Everything in royal blue was exterior to the closed perimeter that is in yellow in this embodiment.

Q And so --

A In this embodiment.

Q Yes, yes. So in figures 2 and 3 when the flip cap moves between its closed and open positions the flip cap never enters within what you have labeled as the closed perimeter, correct?

A Correct. It is only the alternative embodiment that shows that or that discusses that.

Q The loop 54 is what you identify as the claimed handle of Leoncavallo, right?

A The loop is the handle.

Q And I believe Leoncavallo suggests that loop may fit a person's finger or a piece of

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equipment such as a latch to a backpack or similar device; is that right?

A That's correct, yes.

Q And the detents 90 are on the outside of the loop 54, correct?

A Only in this embodiment, yes. In the alternative embodiment they're on the inside.

Q And I will ask about that alternative in just a moment. For right now I'm going to focus on the embodiment shown in figures 2 and 3. So in the embodiment shown in figures 2 and 3 the detents 90 are on the outside of loop 54, correct?

A Correct.

Q And so that means effectively in Leoncavallo the detents 90 are on the outside of the handle, right?

A In this embodiment they would be.

Q And that differs from the '252 patent, which depicts tabs 56 as being on the inside of the handle, correct?

MR. JENNINGS: Object to the form.

A Yes, that is why -- that is why I discuss

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the alternative embodiment in some detail later.

Q Let's turn to column 2, line 26 of Leoncavallo, please?

A 2, 26. I'm there.

Q And begins with the loop. It says, the loop isolates the connector members from a user's finger or attachment hardware passing through the loop so that the user's finger or attachment hardware does not interfere with movement of the flip cap or cause unintentional opening of the flip cap.

Do you see that?

A I do.

Q And then if we could turn to column 5, lines -- line 20?

A Let's find that, 5, 20. Okay, this is talking about the first embodiment, I believe, okay, I'm there.

Q And at column 5, line 20 it says, the connector members 80, 82, may be positioned to engage the outer arcuate surface 64 of the loop 54 so that the flip cap 68 is rotatably supported by

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the loop 54 for movement between the open and closed positions. In this way, the loop 54 isolates the connector members 80, 82, from a user's finger or attachment hardware passing through the loop 54 so that the user's finger or attachment hardware does not interfere with movement of the flip cap 68 or cause unintentional opening of the flip cap 68.

Do you see that?

A I do.

Q So Leoncavallo teaches that by positioning the connector members 80 and 82 on the outside of the loop it prevents the connector members from hitting a user's finger or attachment hardware passing through the loop and also prevents unintentional opening from such contact, correct?

MR. JENNINGS: Object to the form.

A For this embodiment those can be some of the advantages in the alternative embodiment. There are other advantages that aren't present here.

Q If the connector members were moved to the

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inside of the loop, then the user's finger or the attachment hardware could interfere with opening and closing of the cap, right?

A Well, not necessarily. If you put the tabs on the inside of the loop, there could be users that may want to be able to open and close the cap completely with one finger. For example, if you -- if you fit your finger inside the loop, you could design it such that all you had to do was like drawing a pistol from a holster. You just need to flip it and the cap comes open, right, because you could use the momentum of the liquid in the bottle against the contact between your finger and the inside of that loop if you wanted that as an advantage.

I mean, he talks about two embodiments I think for that reason. The different embodiments have different pluses and minuses.

Q And another disadvantage that he discusses of putting the connector members on the inside of the loop, is that the user's finger or the attachment hardware should unintentionally cause

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the cap to open, right?

MR. JENNINGS: Object to the form.

A Again, one user may see that as an advantage, one user may see it as a disadvantage. If you want one-handed operation, you may want it to open. I think all he is saying is if you prescribe to this first embodiment, here are some advantages. If that were the only way to do it, he wouldn't have discussed the second embodiment that does, in fact, have the detent on the inside of the loop.

Q Unlike Samartgis, Leoncavallo doesn't have any kind of structure designed to lock the cap in the closed position, correct?

MR. JENNINGS: Object to the form.

A I think he has.

Q Let me clarify that. So the -- the loop itself in Leoncavallo doesn't have a structure to lock the cap in the closed position, correct?

MR. JENNINGS: Object to the form.

A He uses a different kind of latch somewhere around structure 122, I believe, in

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figure 3 --

Q Okay. Thank you.

A -- that does that, I believe.

Q Now, this -- now, this alternative embodiment in Leoncavallo you have been referring to do you discuss that on page 107 of your report?

A I believe that is just about right, check quickly. That's correct.

Q And --

A Five lines down.

Q Yes. Okay, I will read that. You state, however, Leoncavallo describes an alternative embodiment wherein the connector members are located on the inside of the loop 54.

Do you see that?

A I do.

Q And your support you rely on for that alternative embodiment is column 5, lines 50 to 55 of Leoncavallo, correct?

A Correct.

Q So if we go to column 5, lines 50 to 55 of Leoncavallo, Leoncavallo states, also, while the

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flip cap 68 is shown with the arcuate connectors 80, 82, positioned on the outer surface 64 of the loop 54, it is contemplated that in an alternative embodiment one or more connector members may be provided on the flip cap 68 that engaged the inner arcuate surface 92 of the loop 54 instead.

Do you see that?

A I do.

Q Now, that is the only sentence in Leoncavallo that describes this alternative embodiment, correct?

MR. JENNINGS: Object to the form.

A Yeah. He adds that those skilled in the art would appreciate other connection structures are possible as well.

Q So that would be referring to some other potential embodiment, right?

A Correct, but that description is enough to tell me basically what I need to do to put that on the inside, put the detents on the inside.

Q And so that single sentence from column 5, lines 50 to 55 is the only sentence describing

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that alternative embodiment you have relied on, correct?

A I think it is the only sentence it needs to discuss the rest of the invention throughout the specification, but that is correct.

Q And that sentence never specifies where the detents 90 are located in that embodiment, correct?

A Yeah. I mean, that would be a design choice. He explained the invention and what the detents do. And reading the specification one understands how it works. And now he is just saying, given all of this you have been taught now, by the way you can put these detents on the inside. So I wouldn't expect him to go through all the description he did in the first embodiment once again and repeat it in the second embodiment.

Q But Leoncavallo never expressly says put the detents 90 on the inside in this alternative embodiment, right?

A Well, he says -- again, now let's see. Connector member may be provided and engages on

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the inner surface, so he is saying put on the inner surface instead. I read that to mean he put the detents on the inner surface.

Q I mean, it would be -- it would be possible for the connector members to engage the inner arcuate surface 92 in its entirety without engaging any detents, right?

A But he's talking about connector members similar to the connector members he was talking about before, which was a raised -- he calls it a detent, but is a raised detent. He is just saying use the same structure, but put it on the inside. So that detent --

Q The alternative embodiment -- sorry.

A No, my fault, I paused.

I'm just saying that -- so those raised structures would be on the inside of the loop. Now I'm done.

Q But it would be possible in this alternative embodiment to not have any detents on the inner arcuate surface 92 of the loop, correct?

A Well, he's talking about these connector

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members. And the first time he talks about those, see if we can find that. Right, so those are connector members 80 and 82, so I'm on paragraph, column 5, line 9.

Q Those connector members serve the purpose of allowing the cap to rotate about the loop, right?

A Right, and they can do the same thing on the inside.

Q Right. And so those connector members could be on the inside and allow the cap to rotate about the loop without using any detents, right?

A But the whole idea is to have some means to keep it open. So you have to have -- you have to have a detent on the inside of the ring. If you are going to have the connector members rotate on the inside, there has got to be something to frictionally engage it so it stays open.

Q But it used --

A That is why --

Q -- that is using, sorry, a finger, using their finger to manipulate the inside of the loop

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might not want detents, right?

A Yeah, but the detents would be on the inside of the ring, 56, right. So instead of having the detent 90 on the outside, you have it on the inside. You can design that loop so it is a closed loop that has some clearance where the detent may be, until you get to a location where it is open and it locks. That is fairly straightforward to do. That is -- when I read this, that is immediately what came to my mind putting the detent on the inside and the connectors on the inside.

Q So even though you could put the detents 90 on the inside of the loop, the sentence you rely on doesn't say that the detents necessarily are on the inside of the loop, right?

A Well, if the connector members -- the whole structure here is a connector members -- connector members in a detent. He is telling me put the connector members on the inside, right. So what that tells me is then the detents themselves must be in the inside of the loop and

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the inside of, I think surface 56.

Q But the connector members serve a purpose independent of engaging the detents, right?

MR. JENNINGS: Object to the form.

A Well, the connector members allow us to rotate about the loop and they interfere with the detents, that frictional engagement to hold the closure open.

Q So in that alternative embodiment, there are not necessarily detents 90 on the inside of the loop, correct?

A Well, as you read this, the whole -- the whole patent deals with holding the cap open using a detent and the connectors 80 and 82. Now, that is the whole description of how that opens and stays open. So I read that sentence and I say, okay, well, he's talking about taking that structure and flipping it so that the detent is on the inside. And I don't think he has to expressly say it because he is taking so much time discussing that in the rest of the specification. As soon as I read that, that is the first thing I

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thought of was, oh, okay, the detent is on the inside.

Q So it was obvious to you that you ought to put detents 90 on the inside, right?

A In the alternative embodiment that is what I read.

Q And is it your opinion that those detents 90 are necessarily present on the inside of the loop in that alternative embodiment?

A It is my opinion that they are the most likely in that embodiment. He goes on to say at the end of that paragraph in column 5, other pivotal connections could be used, but he doesn't discuss those at all. He just discusses basically taking the first embodiment and flipping it so the detent is on the inside of the loop. That is the way I understand the specification.

Q And you suggested there could be advantages to putting the connector members on the inside of the loop, but Leoncavallo doesn't discuss those advantages, right?

A He just mentions that it can be done,

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which implies that if you are going to do it a different way you must see an advantage to it.

Q He doesn't expressly --

A No, you wouldn't do that if there were no advantages.

Q But Leoncavallo never explicitly describes any advantages of placing the connector members on the inside of the loop, right?

A No, and I'm not surprised he doesn't, because you know, now we're into the realm of what the designer is going to help -- how his design will produce whatever performance and function for a particular instance. So someone who uses this patent as a guide, may want for some reason to have the, you know, the detents on the inside of the loop, for whatever reason. It could be many different reasons.

Q And in fact, Leoncavallo's only discussion of the effect of putting the connector members on the inside of the loop is that it would be disadvantageous to do so, right?

MR. JENNINGS: Object to the form.

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A Well, again, there are advantages and disadvantages to each embodiment. If you -- if they're mutually exclusive, one of the advantages in one embodiment, let's say, you wanted to be able to have one-handed operation to open and close it, okay. The design discussed in embodiment 1 would be a disadvantage. It all depends on what your design intent is.

Q Leoncavallo's only discussion of advantages or disadvantages of placing the connector members on the outside or inside of the loop, is that it would be disadvantageous to place them on the inside, correct?

A He talks about that. I believe it is the same column.

Q We read those two sentences earlier.

A Right. Again, when you read the first embodiment and how he talks about advantages, it is only an advantage if that is the kind of performance you want. In other words, it could be an advantage. If you are looking for A, B and C, this would be a advantage. If you are looking for

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D and E, maybe the other embodiment is an advantage. I just described to you a case where I could see the second embodiment having certain advantages over the first embodiment.

Q Okay. I understand that, I'm just talking about Leoncavallo and Leoncavallo's statements.

MR. MUDD: So Susan, would you read back my prior question?

(Record read.)

A And I believe I answered it before. He talks about these features as advantages, but why even have an alternative embodiment if there wouldn't be advantages to the alternative embodiment over the first embodiment. And even more than just alternative embodiments, he implies that there could be other structures possible for doing this. So there could be more than one alternative embodiment that would have advantages over the first embodiment.

Q Okay. Let's turn to Exhibit 1006, which I'm putting into the chat.

(Exhibit 1006 marked.)

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A That would be Miller.
Q Yes.
A Are we done with Leoncavallo for now or should I keep it up?
Q I believe we are for now, yes.
A Okay. Because I'm going to have to figure out how to pull all this together when we're done here, okay.
Q I haven't done my job if I haven't created a mess of papers for you.
A You're doing a great job.
Q Let's wait a minute until that opens up. I will represent -- okay.
A I don't know why it is taking so long to open.
Q Yeah, it is not even a megabit.
A There it is. This is a design patent. Okay, I have this in front of me, so I will look there.
Q I will represent for the record Exhibit 1006 is U.S. Design Patent D586,184 to Miller.
Have you seen this document before, Dr.

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Vallee?

A I have.

Q And do you understand this to be the Miller reference you have opined on in your declaration?

A Correct.

Q And you testified a minute ago that Miller is a design patent, correct?

A That is correct.

Q What is your understanding of what a design patent is?

A It is generally a patent that shows form, the look, the appearance of a device. And by that you can understand somewhat, you know, what it is related to and in some cases how it works.

Q And specifically a design patent is directed to the ornamental design of an article, right?

MR. JENNINGS: Object to the form.

A A design patent does relate to the ornamental design, that's correct.

Q And specifically, Miller in its claim is

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directed to the ornamental design for a beverage container, correct?

A That is correct.

Q So Miller claims an ornamental design, not any function of Miller, correct?

MR. JENNINGS: Object to the form.

A It is claiming the ornamental design. What I alluded to before is by observing the ornamental design you can read a lot into the function.

Q Dr. Vallee, in your opinion, is a drink spout just any opening in a drink container through which liquid can flow?

A Well, in the field of these drink containers it would be an opening that allows the fluid to flow from the inside of the container to the user, and it would have a size adequate to allow someone to extract the liquid from the container.

Q Okay.

A When I look at Miller, I see the spout must be underneath the cap.

Q Okay. If we could turn to the '252 patent, specifically claim 5 and take a look at the drink spout claimed in claim 5.

A Get my bearings here.

Q I want to start with the element right before that which recites a base. Are you there?

A I'm almost there. I'm trying to find myself in my report as well. Okay. Now, you want me to go to the '252?

Q Yes, claim 5?

A Claim 5.

Q And specifically I'm at column 18, line 50 where it recites a base?

A Column 18, line 50, so that would be a base removably coupled. Okay, I am there.

Q Okay. So this limitation recites a base removably coupled to the neck of the liquid container. Do you see that?

A I do.

Q In the next limitation it recites a drink spout extending from the base in defining a passage through which drink liquid from the

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internal compartment of the liquid container may be selectively dispensed.

Do you see that?

A I do.

Q And so the claimed drink spout must extend from the base, right?

A Correct.

Q So a mere opening in the base through which liquid can flow that doesn't extend from the base would not satisfy the claimed drink spout, correct?

MR. JENNINGS: Object to the form.

A The drink spout has to extend from the base.

Q And so an opening that doesn't extend from the base would not satisfy a drink spout extending from the base; right?

A Yes, the spout must extend from the -- let's hold on just a second. It doesn't say how much, but yeah, I don't read that claim element to be like it is just a hole in the base.

Q Okay. Great. If we go back to Miller and

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we look at figures 1 through 7 of Miller, which all have what appears to be a cap in a closed position, you can't tell whether there is simply a hole or whether there is a drink spout extending from a base, correct?

A Well, I don't agree with that, because if you look at the structure of this -- well, let's look at figure 4. For example, I look at that as, okay, you have the base, and everything under that cap extends from it, right. The base would be the lower part that is kind of described by the horizontal line where it meets the container and a parallel line above that. That would be the base --

Q You don't know what the structure -- sorry.

A That would be the base and the spout begins above the base, so that extends from the base and the cap simply pops over it. I've seen a lot of water bottles that look similar to this. And when I look at this as one in the art, I say, okay, it opens up and there has got to be

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something, a continuation of what I'm calling the start of the spout which is just below the cap.

And the cap is, like, on an angle, maybe 45 degrees or so, maybe 30 degrees. So when I look at this, and I see a hinge I say, okay, the cap pops up, and there is some kind of structure underneath that that extends even farther, right? It wouldn't just -- it wouldn't just end there. It wouldn't just end at the bottom of the cap.

So I see a spout under there and I mean, anyone in the art who looks at this is going to expect to see that.

Q Are you saying that the spout is part of the structure that comes into contact with the lower edge of the cap?

A It is the structure that is immediately below the bottom surface of the cap. The spout is in that region. And it extends from the base, which I described as, I think, two horizontal, two parallel lines that run perpendicular to the axis of the container.

Q I understand what you are saying. So if

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you could turn to page 40 of your declaration, where you have an annotated version of figure 5 of Miller let me know.

A Was that page 40?

Q Yes, page 40.

A Okay, I'm there.

Q And so at the lower edge of what you call the closure that you have colored dark blue?

A Yeah.

Q The lower edge of the closure contacts what you have labeled as the base and colored light blue, correct?

A Correct.

Q And at the top you have the words closure covering a spout, right?

A Correct.

Q So in your opinion, the spout is inside of the closure and you can't see it in figure 5, correct?

A Well, I think you can see the lower portion of it. Even though it is the same color as the base, the closure covers the spout. So the

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spout is at least in -- partially located inside the closure or I will call it the cap.

Q You have not labeled anything light blue as being a spout, right?

MR. JENNINGS: Object to the form.

A I labeled it, if you notice where I point at the base, okay, that points to the lower section where I just described that as the thickness basically equivalent to the distance between two parallel lines. If I added another color, I mean, I would have to have a third color and that would have confused the issue. I mean a spout basically extends from that space.

Q Yes, you have labeled the light blue area the base not the spout, correct?

MR. JENNINGS: Object to the form.

A I point to the lower portion, right. I don't point to a base up near where the cap is. The section down -- when I drew this figure, I meant the base is the portion down below and the spout begins immediately over those two parallel lines. That is where the spout starts to form,

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okay and it probably has --

Q So it is your opinion now that you can see the spout in figure 5; is that correct?

MR. JENNINGS: You know, Jason, you are interrupting the witness there, so I would appreciate if you let him finish.

Q Sure.

A I'm sorry, all I was going to finish saying was you can see the beginnings of the spout in that figure and the spout has a reduced diameter like a little step that fits within the closure. But either way, whether it is the portion that is in light -- I think that is a light blue I will call it just below the cap or it is just the region within the cap, the spout is defined in that area. And it does -- and even if we were to assume the base is everything that is in light blue, the spout does extend from that base, because the spout is inside what I will call the cap.

Q That makes -- okay.

So let's start here with the premise is

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the spout or any portion of it visible in figure 5, yes or no?

A Yes. I believe the portion that is just below the what I call the closure is the beginning of the spout and it extends from the base.

Q Okay. And so that portion below the closure, which I believe is colored light blue is it part of the base and the spout both?

A I believe what I said was it is in the color of the base and it extends from the base and that is where the spout just begins. I think I talk about that, let's see, on page 125. So on paragraph 223, I talk about how one of skill in the art would have understood that any cap assembly would have to have an opening forming the passageway for the dispensing of beverage and would recognize from the figure that it would include a passageway covered by the closure.

So the passageway of the upper end of the spout would be underneath the closure. This shape would have communicated -- the shape of the closure would communicate to one skilled in the

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art that that includes the spout. So there is a spout underneath the closure, that is what that means.

And all I was testifying to here was that the spout starts in that area underneath the cap, starts in the tapered area just below it so that is the transition point. Maybe that is a better way to say it, but either way the spout is at least inside that closure. One would expect it to be there, it wouldn't just be a hole, it would be in there.

Q Okay. Let's turn to paragraph 74 on page 41 of your declaration.

A Paragraph 74. All right, I'm there.

Q You state, although not depicted in Miller, one skilled in the art would have understood that the base of the cap assembly would necessarily include a passage through the base, i.e., a spout for dispensing the contents of the beverage container to the user.

Do you see that?

A I do.

Q So you state in paragraph 74 that a spout is not depicted in Miller, right?

MR. JENNINGS: Object to the form.

A I think what I just said was that one in the art --

Q I'm not asking what you just said, let me stop you there. I'm asking you, do you state in paragraph 74 that a spout is not depicted in Miller?

MR. JENNINGS: Object to the form. Object to the interruption of the witness.

A So I will take -- I don't say it specifically in 74, because I say in 223, claims one skilled in the art, paragraph 223, one skilled in art would have understood that any cap assembly would necessarily include the opening, et cetera. And that the shape of the closure would have communicated to one in the art that Miller includes a spout.

So while I don't say exactly in paragraph 74, to answer your question, I do say it in my more detailed discuss on a claim-by-claim basis in

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paragraph 223.

Q So you testified earlier today in your deposition that a spout is visible in Miller but in your report in paragraph 74, you say a spout is not depicted in Miller, correct?

MR. JENNINGS: Object to the form.

A What I said was if you take the beginning of the spout to be the portion immediately below the royal blue cap, that you can see, but even if you were to assume that is not the case, what I testified to was one would understand that there has got to be a spout under that cap. I believe that that is what I said.

Q Okay. I understand your opinion is that there necessarily is a spout under the cap, I understand that. I'm not asking about that opinion. I'm asking the simple question is -- is a spout shown in the figures of Miller or not?

A And what I answered was that the beginnings of that spout where the taper starts is visible, okay, because you can see the -- you can see the parallel lines that form the base. Then

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extending from the base is this smaller diameter, I don't know if it is cylindrical or not, somewhat cylindrical portion that comes out that starts to form the spout.

But then I said -- and but that is what I assume from looking at the figure. But even if we assume that is not the case and it is not visible, certainly the spout has to be underneath the cap.

Q What did you mean by the words, although not depicted in Miller in paragraph 74?

MR. JENNINGS: Object to the form.

A The portion of the spout that is under the cap that you cannot see.

Q It is the portion and it is the portion under the cap that you cannot see that you are relying on as satisfying the claimed spout of the '252 patent, correct?

MR. JENNINGS: Object to the form.

A Again, that is what I'm saying is that the spout is under the cap for sure and that is not depicted, because it is under the cap. You can't see it. But what I've said is that the beginnings

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of that spout, how it extends from the base is shown immediately below.

Q Now, for paragraph 74 you also opine that the base of the cap assembly would necessarily include a passage through the base of the spout.

Do you see that?

A Again if it is a water bottle it has to have a passageway. I don't believe I point to that anywhere, but I mean it is a water bottle, it has to have a passageway. And anyone looking at these figures would say the passageway has to extend through the cap.

Q A passage through the base could just be a hole, right?

A Well, I think technically if a passageway in any water bottle is some kind of opening, it could be a hole, it could be a large hole, but it would be a hole looking at the spigot with some -- I'm sorry, almost done.

Anyone looking at this you can see this. I'm at -- I'm going to stick with figure 4. It is a water bottle. If you look at the water bottle,

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you can see where the handle is, you can see where the base is, you can see where it connects, you can see exactly where you are going to drink from, right, it is under the cap. There is no place else you can drink from in that. Therefore, when you open the cap every water bottle I have ever seen has a spout. That is where the spout is going to be.

And obviously the liquid -- that was my fault, I paused again. The liquid is held in the container and it has got to go through a passageway to get out so you can drink it. Now I'm done.

Q You testified earlier that just a hole through the base would not constitute a drink spout extending from the base, correct?

A I don't recall that, but if it is in the record, I don't remember.

Q I wrote down not just a hole on my tab tablet here. Are you contesting that testimony now?

MR. JENNINGS: Well, the testimony is what

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it is. Object to the form.

MR. MUDD: Susan, if you are able to read back that portion.

(Record read.)

Q So I believe the testimony we were talking about came before that, so it was before we were even talking about Miller and we were just talking about the '252 patent and the claim language reciting a base where it is -- it is a base removably coupled to the neck, and then a drink spout extending from the base.

(Record read.)

Q So does that refresh your recollection, Dr. Vallee, that you said that the claimed drink spout extending from the base would not be just a hole in the base?

MR. JENNINGS: Object to the form.

A Yes, I remember testifying to that now.

Q Okay. And so in going back to paragraph 74 of your declaration, you state that one skilled in the art would have understood that the base of the cap assembly would necessarily include a

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passage through the base, i.e., a spout.

Do you see that?

MR. JENNINGS: Object to the form.

A I do. I see that, okay.

Q If the base of the cap assembly has just a hole in the base for dispensing liquid, then it would not necessarily have a drink spout extending from the base, correct?

MR. JENNINGS: Object to the form.

A Yeah, I think that is what I said in that paragraph. The base of the cap, of the assembly, would necessarily, has to include a passage through the base.

Q So it necessarily has to have at least a hole in the base, right?

A It has to have some path for a liquid to get from a container out to the user.

Q So you don't know what it has beyond a hole, right?

MR. JENNINGS: Object to the form.

A I know it has a opening that is under the cap where the spout is, like every other water

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bottle I have seen. I do know that just by looking at the picture.

Q Right, but just a hole in the base is not a spout extending from the base as you testified to earlier, right?

A The hole in the base is where you start the pathway. The hole is two-dimensional, right. It has to have a hole in the base to get from the container to the user.

I think all I was saying there was that is not a spout, but it has to have a hole somewhere. It has to have a hole in the base. I mean, if you look at the figure and it is very clear where the spout is. It is right under the cap.

Q None of Miller's figures show its cap in an open position, right?

A Correct.

Q And there is no figure -- strike that.

And because Miller does not contain a figure with the cap in an open position, there is no figure showing what the relationship is between the cap and any drink spout or opening under the

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cap, right?

MR. JENNINGS: Object to the form.

A Anyone looking at a -- at a liquid container -- I could go to one of my students, look at the figure and say, where is the cap, there it is. Where is the spout, it is under the cap. How does it work, it hinges on the back. I mean, you don't even need to open it up to tell anyone that.

Q Say there is a plastic drink --

A You can tell by looking at it.

Q Say there is a plastic drink spout underneath the cap in Miller, okay?

A Okay.

MR. JENNINGS: Object to the form.

Q You can't tell by looking at the figures of Miller whether the cap comes into contact with that plastic drink spout, right?

A Every water bottle I have ever seen that is similar to this, the shape of the spout is very similar to the shape of the cap. It helps it seal, it keeps it tight, so you wouldn't have to

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show it.

Q Okay, fair enough. I'm not asking about every other water bottle you have seen, okay, okay? Is that fair?

A Yeah, I mean as one in the art that is what I base my opinions on to some extent is my experience with them, but I understand your question.

Q Okay. I'm just asking does Miller show any contact between a drink spout and a cap?

MR. JENNINGS: Object to the form.

A Was any contact between the spout and the cap was your question?

Q Yes?

A Again, it doesn't, because it doesn't have to. I know where the spout is. There was only one place you can get the liquid through and that is under the cap. That has got to be where the spout is.

Q Okay. Let's go ahead and take a short break, maybe just five minutes and let me take a look at my notes. I think I'm just about ready to

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wrap up.

(Recess, 4:01 to 4:07 p.m.)

MR. MUDD: I have no further questions, Dr. Vallee. Thank you for your time, I appreciate it.

MR. JENNINGS: Okay, I have no questions for the witness. Reserve the right to review the transcript and make corrections as appropriate.

(Deposition adjourned at 4:07 p.m.)

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CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

I, Susan S. Klinger, Certified Reporter and Notary Public within and for the State of Texas do hereby certify:

That Glenn Vallee, Ph.D., the witness whose deposition is hereinbefore set forth, was duly sworn by me before the commencement of such deposition and that such deposition was taken before me and is a true record of the testimony given by such witness.

I further certify that the adverse party, TROVE BRANDS, LLC, was represented by counsel at the deposition.

I further certify that the deposition of Glenn Vallee, Ph.D., occurred virtually on Monday, January 20, 2025, commencing at 9:01 a.m. to 4:07 p.m.

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I further certify that I am not related to any of the parties to this action by blood or marriage, I am not employed by or an attorney to any of the parties to this action, and that I am in no way interested, financially or otherwise, in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 23rd day of January, 2025.

My commission expires:
October 23, 2025



Susan S. Klinger, RMR-CRR, Texas CSR 6531
NOTARY PUBLIC IN AND FOR THE STATE OF TEXAS

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