

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

CASE IPR2024-00913

PATENT 8,014,394

JUNIPER NETWORKS, INC., *

*

Petitioner, *

*

VS. *

*

PORTSMOUTH NETWORK CORP., *

*

Patent Owner. *

ORAL DEPOSITION OF

JAMES OLIVIER, PhD

JULY 17TH, 2025

ORAL DEPOSITION OF JAMES OLIVIER, PhD, produced as a witness at the instance of the PETITIONER, and duly sworn, was taken in the above-styled and numbered cause on the 17th of July, 2025, from 10:01 a.m. to 10:34 p.m., via Zoom, before Tammy Staggs, CSR in and for the State of Texas, reported by machine shorthand, at Remote Locations, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto. That the deposition shall be read and

1 signed under penalties of perjury. That the deposition
2 shall be read and signed before any notary public.

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1 A P P E A R A N C E S
2 (All appearances via Zoom)

3 FOR THE PETITIONER:

Mr. Scott McKeown
4 WOLF GREENFIELD & SACKS, P.C.
605 Third Avenue
5 25th Floor
New York, New York 10158
6 212.697.7890
smckeown-ptab@wolfgreenfield.com

7
8

FOR THE PATENT OWNER:

9 Mr. James Winn
STEPTOE & JOHNSON, LLP
10 227 West Monroe
Suite 4700
11 Chicago, Illinois 60606
312.577.1260
12 jwinn@steptoe.com

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1 P R O C E E D I N G S

2 JAMES OLIVIER, PhD,

3 having been first duly sworn, testified as follows:

4 EXAMINATION

5 BY MR. MCKEOWN:

6 Q. Good morning, Dr. Olivier. I'm Scott McKeown
7 of Wolf Greenfield & Sacks. I represent Juniper
8 Networks today.

9 MR. MCKEOWN: I see we have another
10 attorney on the line, so I would like to enter in all
11 appearances.

12 MR. WINN: Hi, my name is James Winn on
13 behalf of Patent Owner Portsmouth.

14 MR. MCKEOWN: Thank you.

15 Q. (BY MR. MCKEOWN) Dr. Olivier, I know you've
16 been deposed before, and you know how all this works.
17 But, you know, just to reiterate briefly: if you need a
18 break, let me know. I will announce breaks
19 periodically, so hopefully we won't be going too -- too
20 long. But, again, I know you've -- you've been deposed
21 before, so you know how all this works.

22 In the chat window there are some
23 documents. You can feel free to access them as they
24 come up. One of them -- let me see if I can get that
25 chat window back up. So Exhibit 1005 is the Blease --

1 MR. MCKEOWN: That's B-L-E-A-S-E for
2 purposes of court reporting.

3 (Exhibits 1001, 1005, 1006, and 2005
4 introduced.)

5 Q. (BY MR. MCKEOWN) Exhibit 1001 is the '394
6 Patent. There is Exhibit 1006, which is Weyman. And
7 then there is your declaration, which is designated
8 2005, Olivier.

9 Can you access Exhibit 2005, please?

10 A. I'll give it a shot.

11 Q. Sure.

12 MR. WINN: I just want to -- I'm not able
13 to access any of these files.

14 MR. MCKEOWN: These are all directly out
15 of the -- directly out of the PTUB file history.
16 They're just copies.

17 MR. WINN: Okay.

18 A. Okay. It's opening up.

19 Q. (BY MR. MCKEOWN) Okay. So we're going to
20 talk about today IPRs 2024-00989 and IPR 2024-00913,
21 which were consolidated, both directed to U.S Patent
22 8,014,394. And the document that you opened, that
23 should be the declaration you submitted in those
24 consolidated proceedings. Can you just confirm that the
25 declaration you've opened as Exhibit 2005 is, in fact,

1 the one that you signed and filed in those proceedings?

2 A. Oh, I thought you said open 1005. Sorry. I
3 got to download it.

4 Q. Oh, sorry. Yeah, I guess there is a 2005 and
5 a 1005.

6 A. Okay. I'm opening it.

7 MR. WINN: I just want to confirm, is he
8 accessing documents from the chat or is he accessing
9 documents from his files?

10 MR. MCKEOWN: I believe --

11 THE WITNESS: The chat.

12 MR. MCKEOWN: -- it's the document from
13 the chat. If you would rather access your own copy,
14 that's fine too. There's no differences between them.

15 A. Yes, this appears to be the declaration I
16 signed --

17 Q. (BY MR. MCKEOWN) Okay.

18 A. -- on May 9th.

19 Q. Okay. Thank you.

20 If you could move to paragraph 1 in that
21 declaration, just let me know when you're there.

22 A. I'm there.

23 Q. Okay. That paragraph states that you have
24 been retained on behalf of Patent Owner, Portsmouth
25 Network Corporation; is that correct?

1 A. Correct.

2 Q. Is your engagement directly with Portsmouth or
3 is it through the Steptoe firm?

4 A. It's through the Steptoe firm.

5 Q. Okay. So when you submit invoices, they go to
6 the Steptoe firm?

7 A. Correct.

8 Q. Okay. Do you have any other engagements
9 pertaining to the '394 Patent?

10 A. I have other work with Steptoe. Regarding the
11 '394 patent, I don't believe I have any at this point.

12 Q. Have you been retained by anyone relative to
13 the '394 patent to work on a re-examination?

14 A. I was retained -- I think there was a -- was
15 there a re-exam on this one? There may have been, that
16 I was retained by someone else, but I think that ended
17 after the re-exam.

18 Q. Right. But do you recall the name of the firm
19 there?

20 A. No, I do not.

21 Q. Okay. Let me -- give me a sec. Let me pull
22 it up here. So I'm -- just to be specific, this would
23 be re-exam 90019441. It appears that you submitted a
24 declaration in that proceeding. That is dated March
25 12th, 2025. Does that sound correct?

1 A. Yeah, I have no idea. That's not part of the
2 report that I'm here on today.

3 Q. Okay.

4 A. So I -- I would have to go back and look at my
5 records.

6 Q. So you don't recall submitting that
7 declaration?

8 A. I don't recall when the declaration was
9 submitted. And so I could go back and look at my
10 records if you want.

11 Q. Do you recall the firm that you worked with?

12 A. No, I don't.

13 Q. Do you remember the name Robert Matheson?

14 A. No, I do not.

15 Q. Okay. Was your work on that re-examination
16 invoiced to Steptoe or the other firm?

17 A. I don't know one way or the other. I could go
18 back and look at my records, but I don't recall as I sit
19 here.

20 Q. Okay. Did you meet with anyone virtually or
21 in person to prepare for this deposition?

22 A. Yes, I did.

23 Q. Who was that?

24 A. James Winn.

25 Q. Was there anyone else?

1 A. No, I don't think so.

2 Q. And how many times did you meet with James?

3 A. To prepare for this deposition?

4 Q. Correct.

5 A. I think probably twice.

6 Q. And what was the cumulative total of that time
7 meeting with James?

8 A. I don't know. I can go back and look at my
9 records if you would like.

10 Q. That's fine.

11 Did re-examination counsel participate in
12 any of those meetings?

13 A. No.

14 Q. Have you discussed this IPR with re-exam
15 counsel?

16 A. No.

17 Q. Have you discussed the re-examination with
18 Steptoe?

19 A. I don't recall doing that.

20 Q. Okay. Do you know if your re-examination
21 declaration was submitted in this IPR?

22 A. Oh, I have no idea.

23 Q. Okay. Let's go to your declaration at
24 paragraphs 56 through 58.

25 A. Okay. I'm at 56.

1 Q. If you could take some time, just read 56
2 through 58 and any other paragraphs along the way that
3 you think would be helpful for understanding the content
4 in those three paragraphs. And just let me know when
5 you're done.

6 A. Okay.

7 (Witness reviews document.)

8 A. Okay. I'm done reading those paragraphs.

9 Q. (BY MR. MCKEOWN) Okay. In paragraph 56 -- it
10 looks to be about six lines down -- there's a quotation
11 that begins, (as read): Network switches 6A and 6 -- 6B
12 (networks switches 6) may comprise -- closed paren --
13 may comprise digital subscriber line access multiplexers
14 (DSLAMS), Ethernet switches, or other devices.

15 Do you see that?

16 A. Uh-huh.

17 Q. Okay. So you agree that Blease is not limited
18 to DSLAM configurations?

19 A. Can you show me where that's in my
20 declaration? Did I agree that they are broader than
21 DSLAM?

22 Q. I'm asking you if you agree with that.

23 A. Agree that -- that Blease is not restricted to
24 DSLAMs?

25 Q. Correct.

1 A. Okay. So when you say not restricted, what do
2 you mean?

3 Q. I'm asking you if you disagree with that
4 sentence that the network switches may comprise Ethernet
5 switches?

6 A. No, I don't disagree with that sentence.

7 Q. Okay. Do you walk through an example of an
8 Ethernet implementation in paragraphs 56 through 58?

9 A. Do I walk through an Ethernet implementation?
10 So I guess I don't understand your question of walk
11 through an Ethernet implementation in 56 through 58.

12 Q. Okay. At the end of paragraph 56 is that a
13 DSLAM implementation?

14 A. Oh, that picture?

15 Q. Yes.

16 A. Oh, yeah, that's -- that's -- well, it's more
17 than a DSLAM. It has DSLAMs in it. It has DSL modems,
18 users, a B-RAS, and the Internet.

19 Q. Okay.

20 A. That's the typical way that the consumer gets
21 Internet access.

22 Q. But you don't walk through a configuration
23 where the DSLAMs are replaced by Ethernet switches,
24 correct?

25 A. I do not walk through an implementation where

1 the DSLAMs are replaced by Ethernet switches.

2 Q. Okay.

3 A. Because DSLAMs can't be replaced by Internet
4 Ethernet switches.

5 Q. So are you now disagreeing with the sentence
6 above that states that network switches -- or 6A and B
7 may comprise Ethernet switches?

8 A. No, I'm disagreeing with you when you say that
9 a DSLAM can be replaced by an Ethernet switch.

10 Q. Isn't that what that sentence is saying?

11 A. No. You're kind of taking it out of context.
12 DSLAMs can't be replaced by Ethernet switches because
13 Ethernet cannot travel. If you look at the figure from
14 the DSLAM to a DSL modem, Ethernet is restricted in
15 length.

16 Q. But there can be Ethernet switches in that
17 configuration, correct?

18 A. In what configuration?

19 Q. The configuration on page 24 of your
20 declaration.

21 A. Ethernet switches can be where in that figure?

22 Q. Anywhere.

23 A. No, they can't be anywhere.

24 Q. Okay. So then how do you reconcile that
25 statement with the quote above that you stated you don't

1 disagree with, that network switches 6A and 6B may
2 comprise Ethernet switches?

3 A. Let's see. Networks of Blease. Network
4 switches 6A, 6B.

5 Oh, because that's a different --
6 different implementation than a DSLAM implementation.

7 Q. And, again, you don't go through that
8 implementation in your declaration, correct?

9 A. I don't know if I did or did not go through
10 that implementation in my declaration or not.

11 Q. Okay.

12 A. It wasn't important to my opinion as far as
13 whether a DSLAM can be replaced by an Ethernet switch or
14 not.

15 Q. Is that your opinion that's expressed in those
16 three paragraphs?

17 A. That a DSLAM can't be replaced by an Ethernet
18 switch?

19 Q. Correct.

20 A. My opinion is that a DSLAM cannot be replaced
21 by an Ethernet switch. I don't know if that is an
22 opinion in these paragraphs or not, but that's
23 definitely an opinion that a POSITA would have, being a
24 person who's designed both Ethernet -- Ethernet switches
25 and DSLAMs. I know you can't go to a DSLAM cab and

1 replace it with an Ethernet switch.

2 Q. Can a DSLAM switch work together with an
3 Ethernet switch?

4 A. Yes, they can work together, but not -- you
5 can't replace a DSLAM with an Ethernet switch.

6 Q. Link aggregation protocol, are you familiar
7 with that?

8 A. Yes.

9 Q. That's a standardized technology?

10 A. Yes.

11 Q. Is that part of the Ethernet suite of
12 standards?

13 A. That I don't know off the top of my head. You
14 mean is it part of the IEEE Ethernet suite of standards?

15 Q. Is it an 802 -- is it an 802.3 standard?

16 A. I believe so, yeah.

17 Q. Okay. Can you describe an Ethernet switch to
18 me?

19 A. Sure. Any particular kind or -- there's lots
20 of different Ethernet switches in the world. Probably
21 thousands of different Ethernet switches in the world.

22 Q. Sure. So the one that would be contemplated
23 by the sentence we were looking at in paragraph 56 that
24 states: network switches 6A and 6B may comprise
25 Ethernet switches. I'm talking about those types of

1 Ethernet switches.

2 A. So those type of Ethernet switches would
3 probably be a low-cost Ethernet switch, which would
4 generally be based off of typically a low-cost broadcom
5 Ethernet switch chip with associated electronics to
6 convert the incoming Ethernet packet into the format
7 that the broadcom chip uses to switch the Ethernet
8 packets.

9 Q. Would there be physical ports on that switch?

10 A. Yes.

11 Q. How many --

12 A. Physical and logical ports on that switch.

13 Q. How many physical ports would you expect?

14 A. I would have no expectation. It depends what
15 the application is.

16 Q. How many ports are Ethernet switches known to
17 have?

18 A. They can have -- large switches can have up
19 over 64 or so easily. Small switches typically tend to
20 have eight.

21 Q. And how is link aggregation done on -- done on
22 Ethernet ports?

23 A. How is link aggreg- -- link aggregation done
24 on Ethernet ports? You do a configuration in your
25 switch to tell the switch that this partic- -- these

1 sets of Ethernet ports are going to be running at link
2 aggregation protocol. And then you configure the switch
3 and connect up the Ethernet links physically to the
4 other switch, which is also running link aggregation
5 protocol.

6 Q. And the aggregated links would be logical
7 links?

8 A. No, the aggregated links are physical links.

9 Q. But they would be mapped to logical links,
10 correct?

11 A. No, they would be lapped -- mapped to a
12 logical overall link that is part of how the link
13 aggregation protocol understands that the traffic is to
14 be partitioned across the physical links.

15 Q. So that's a one-to-one link -- or that's a
16 one-to-one mapping rather?

17 A. No.

18 Q. Can you explain the mapping?

19 A. It's different in different situations.
20 Typically there's a link that's in the routing table
21 that's the -- the virtual link that's sending the
22 traffic across. And then when it gets to the actual
23 line cards, they're going to run the link aggregation
24 protocol that is going to pick which physical link to
25 send the packet over.

1 Q. And is the -- so you're familiar with the term
2 "LAG," correct? L-A-G.

3 A. Link aggregation group, yes.

4 Q. And what -- what does that include?

5 A. Well, out of context, it's kind of hard to say
6 what does that include. It includes a link -- it's an
7 acronym for link aggregation group.

8 Q. Well, let me ask it a different way. What's
9 your -- what's the definition of a link aggregation
10 group?

11 A. I don't know if there's any particular
12 definition of it.

13 Q. What is your understanding of it?

14 A. A group of physical links that act as a LAG, a
15 link aggregation group.

16 Q. Is one of the benefits of a LAG increased
17 reliability and availability?

18 A. It could be depending on how it's implemented
19 or it could not be depending on how it's implemented.

20 Q. So say for example if one physical link in the
21 LAG goes down, traffic would then be dynamically and
22 transparently reassigned to one of the other physical
23 links, correct?

24 A. It can if when that link goes down, it's not
25 on the same line card that has the other physical links.

1 So it depends on how it's implemented.

2 Q. Okay. And another benefit for a LAG would be
3 better use of physical resources. For example, traffic
4 can be load balanced across physical links; is that
5 correct?

6 A. It's better used as physical resources.
7 LAGs -- again, it depends how -- how the LAG is
8 implemented if it's again going to the same -- if you
9 have two links going to the same line cards on both
10 sides, then you actually decrease your reliability
11 because you increased your failure rate. But if you
12 engineer it correctly, it's possible to get a benefit
13 out of using a LAG group.

14 Q. So is load balancing across physical links a
15 better use of physical resources?

16 A. It can or cannot. You're using two resources
17 to send the traffic, whereas you could have just used
18 one higher speed link; and, therefore, you would have a
19 better use of physical resources by just increasing your
20 link speed. So it depends on how it's implemented.

21 Q. But you don't disagree it's a benefit in some
22 situations?

23 A. It could be a benefit in some situations.

24 Q. Okay. Is another benefit cost effectiveness?
25 So in other words, a physical network upgrade is

1 expensive, especially if it requires new cable runs. So
2 link aggregation increases bandwidth without requiring
3 new equipment?

4 A. Yeah, I guess I didn't quite hear all that
5 statement.

6 Q. Sure. So I'm asking if cost effectiveness is
7 a benefit of a LAG. And the example would be where a
8 physical network upgrade is expensive -- is expensive and
9 you need to require a new cable run. The link
10 aggregation would increase the bandwidth without
11 requiring new equipment.

12 A. I guess that could or could not be true. You
13 can definitely upgrade links typically without having
14 to -- it kind of depends if you can get a LAG group out
15 of the situation or not. You have to have the
16 particular links already connecting up. So I don't see
17 how that benefits you because you already had the link
18 going to the -- the other side, and all you did was bind
19 it together in a group versus sending it over two links
20 like in an active-active mode. So I wouldn't say that's
21 entirely correct.

22 Q. What part of it isn't correct?

23 A. Can you read it back to me again?

24 Q. So I'm asking if cost effectiveness is a
25 benefit -- benefit of a LAG. And the example was a

1 physical network upgrade, which is expensive, if it
2 requires new cable link aggregation would increase the
3 bandwidth without requiring new equipment.

4 A. You see, that -- that sentence doesn't make a
5 lot of sense in that you're saying I can do link
6 aggregation without requiring a new cable, which means I
7 already had a wire going from the two switches that are
8 going to be -- you're going to make in the LAG group,
9 which means I already had the connection there. So how
10 did I save anything by taking links that were already
11 running active-active and now running them in a LAG
12 group? I can't see how that saves you anything as far
13 as cost or effectiveness.

14 Q. Well, a LAG increases bandwidth, correct?

15 A. It does not increase the bandwidth of the
16 physical link. The physical link is already running at
17 their bandwidth.

18 Q. So then what's the point of a LAG?

19 A. What's the point of a LAG? It -- if it's
20 wired -- if it's done in the proper manner, you can
21 sometimes increase the reliability by running your LAG
22 groups to different line cards on other switches and
23 therefore one line card won't tear down your link.
24 That's the main benefit of a LAG.

25 Q. Isn't bandwidth utilization over physical

1 connections a benefit of a LAG?

2 A. If you already had the links connecting and
3 they're at a particular physical speed, then you don't
4 get any more bandwidth utilization. You only -- you
5 only get the same bandwidth you had before.

6 Q. But you can more effectively do load
7 balancing, correct?

8 A. In -- you can do load balancing in a number of
9 different ways by having different routes in your
10 routing table. So to me the main benefit of a LAG is if
11 you can wire them to two different line cards. And this
12 is what we almost always use LAG groups for in
13 networking is we wire them to two different line cards,
14 and therefore increase our reliability if we wire it up
15 correctly. In other words, a single link failure won't
16 take -- won't isolate one switch from another.

17 Q. So load balancing is not a reason to use a
18 LAG?

19 A. You -- load balancing -- you can achieve load
20 balancing a lot of different ways. So it's not -- it's
21 not a reason you would typically use a LAG for -- for,
22 but you could if you wanted to.

23 Q. Okay. The -- in the chat window there's a
24 Weyman -- I don't know if I'm pronouncing that correctly
25 -- but it's Exhibit 1006. Can you access that document?

1 A. Sure. Okay.

2 Q. If you could take a look at paragraph 69 of
3 that reference, just read through it. Let me know when
4 you're -- when you're done.

5 A. Sixty-nine, I see it.

6 Q. Okay. Have you read it?

7 A. Give me a sec.

8 (Witness reviews document.)

9 A. Okay.

10 Q. (BY MR. MCKEOWN) Can you explain -- so around
11 the second line of paragraph 69 there's a phrase,
12 "router configuration." Can you explain to me your
13 understanding of that?

14 A. That would be the way the router is configured
15 to operate at this particular time. In other words, the
16 parameters in the -- you have to think of it kind of as
17 the state of the router.

18 Q. Does the state of the router include the
19 routing tables?

20 A. The state of -- I mean, the routing
21 configuration would include perhaps part of the tables
22 in the routers. It may or may not -- typically that
23 kind of information isn't part of the router
24 configuration. The router configuration is typically
25 what a person has configured a router as. And the

1 tables are usually generated with interactions over
2 signalling links.

3 Q. Okay. In paragraph 69 there's a term about
4 eight or nine lines down, non-default. Do you see that?

5 A. Right.

6 Q. And in your declaration -- I'll give you a
7 citation here in a minute. This will be about paragraph
8 60 of your declaration -- you say that that's a typo; is
9 that right?

10 A. Correct.

11 Q. And how do you arrive at the conclusion that
12 it's a typo?

13 A. Because the paragraph doesn't make sense
14 unless that's a typo. And when I first read it, it
15 didn't make sense to me. And as a POSITA, I couldn't
16 figure out how to reconcile it, what -- the
17 contradictions in the paragraph -- until I realized that
18 was a typo.

19 Q. Okay.

20 A. Then everything made sense.

21 Q. Can you go to paragraph 156 of Weyman? Take a
22 minute or two to read that paragraph.

23 (Witness reviews document.)

24 A. Okay.

25 Q. (BY MR. MCKEOWN) Can you read the last

1 sentence aloud that begins: as the configuration?

2 A. (As read): As the configuration of the
3 multicast rather is changed, it is plain that changes
4 must be made on all units within the fabric.

5 Q. Okay. That sentence is not in paragraph 69,
6 correct?

7 A. No.

8 Q. Okay. Does that change your understanding of
9 paragraph 69?

10 A. No.

11 Q. So then is the use of non-default in paragraph
12 156 also a typo?

13 A. Yes.

14 MR. MCKEOWN: No further questions.
15 Thanks for your time, Dr. Olivier.

16 MR. WINN: I don't have any questions.

17 MR. MCKEOWN: Okay.

18 (Deposition concluded at 10:34 a.m.)

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1 CHANGES AND SIGNATURE

2 Reason Codes: (1) to clarify the record; (2) to conform
 3 to the facts; (3) to correct a transcription error; (4)
 4 other (please explain).

5 PAGE LINE CHANGE REASON

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1 I, JAMES OLIVIER, PhD, have read the foregoing
 2 deposition and hereby affix my signature that same is
 3 true and correct, except as noted above.

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JAMES OLIVIER, PhD

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14 THE STATE OF _____)

15 COUNTY OF _____)

16

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18

Before me, _____, on this

19

day personally appeared JAMES OLIVIER, PhD, known to me

20

(or proved to me under oath or through

21

_____)(description of identity

22

card or other document)) to be the person whose name is

23

subscribed to the foregoing instrument and acknowledged

24

to me that they executed the same for the purposes and

25

consideration therein expressed.

1 Given under my hand and seal of office this
2 _____ day of _____, 20____.
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7 _____
8 NOTARY PUBLIC IN AND FOR
9 THE STATE OF _____
10 COMMISSION EXPIRES: _____
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14 ___ No changes made ___ Amendment Sheet(s) Attached
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1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3 CASE IPR2024-00893
4 PATENT 6,917,986
5 JUNIPER NETWORKS, INC., *
*
6 Petitioner, *
*
7 VS. *
*
8 PORTSMOUTH NETWORK CORP., *
*
9 Patent Owner. *

10

11

12 REPORTER'S CERTIFICATION
13 DEPOSITION OF JAMES OLIVIER, PhD
14 JULY 17TH, 2025
15
16

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18

19 I, Tammy Staggs, Certified Shorthand Reporter in
20 and for the State of Texas, hereby certify to the
21 following:

22

23 That the witness, JAMES OLIVIER, PhD, was duly
24 sworn by the officer and that the transcript of the oral
25 deposition is a true record of the testimony given by
the witness;

26

27 That the original deposition was delivered to Mr.
28 Scott McKeown.

29

1 That a copy of this certificate was served on all
2 parties and/or the witness shown herein on
3 _____, 20____.

4 I further certify pursuant to FRCP Rule 30(f)(1)
5 that the signature of the deponent:

6 _X_ was requested by the deponent or a party
7 before the completion of the deposition and that the
8 signature is to be before any notary public and returned
9 within 30 days (or ____ days per agreement of counsel)
10 from date of receipt of the transcript. If returned,
11 the attached Changes and Signature Page contains any
12 changes and the reasons therefore:

13 __ was not requested by the deponent or a
14 party before the completion of the deposition.

15 That the amount of time used by each party at the
16 deposition is as follows:

17 Mr. Scott McKeown - (0:33)

18 Mr. James Winn - (0:00)

19
20
21
22
23
24
25

1 That pursuant to information given to the
2 deposition officer at the time said testimony was taken,
3 the following includes counsel for all parties of
4 record:

5 FOR THE PETITIONER:

6 Mr. Scott McKeown

7

8 FOR THE PATENT OWNER:

9 Mr. James Winn

10

11

12

13

14

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22

23 That \$_____ is the deposition officer's
24 charges to the Petitioner for preparing the original
25 deposition transcript and any copies of exhibits;

1 I further certify that I am neither counsel for,
2 related to, nor employed by any of the parties or
3 attorneys in the action in which this proceeding was
4 taken, and further that I am not financially or
5 otherwise interested in the outcome of the action.

6 Certified to by me this ____ day of
7 _____, 20____.

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Tammy Lea Staggs

Tammy Lea Staggs

CSR 7496

Expiration Date: 10/31/2026

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1 COUNTY OF _____)
 2 STATE OF TEXAS)

3 I hereby certify that the witness was notified
 4 on _____ that the witness has 30 days
 5 or (____ days per agreement of counsel) after being
 6 notified by the officer that the transcript is available
 7 for review by the witness and if there are changes in
 8 the form or substance to be made, then the witness shall
 9 sign a statement reciting such changes and the reasons
 10 given by the witness for making them;

11 That the witness' signature was/was not returned
 12 as of _____, 20____.

13 Subscribed and sworn to on this, the _____ day of
 14 _____, 20____.

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 Tammy Lea Staggs
 CSR 7496
 Expiration Date: 10/31/2026
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 Firm No. 633



Magna

Key Contacts

Schedule a Deposition:

Scheduling@MagnaLS.com | 866-624-6221

Order a Transcript:

CustomerService@MagnaLS.com | 866-624-6221

General Billing Inquiries:

ARTeam@MagnaLS.com | 866-624-6221

Scheduling Operations Manager:

Patricia Gondor (E: PGondor@MagnaLS.com | C: 215-221-9566)

Customer Care:

Cari Hartley (E: CHartley@MagnaLS.com | C: 843-814-0841)

Director of Production Services:

Ron Hickman (E: RHickman@MagnaLS.com | C: 215-982-0810)

National Director of Discovery Support Services:

Carmella Mazza (E: CMazza@MagnaLS.com | C: 856-495-1920)

Billing Manager:

Maria Capetola (E: MCapetola@MagnaLS.com | C: 215-292-9603)

Director of Sales Operations:

Kristina Moukina (E: KMoukina@MagnaLS.com | C: 215-796-5028)

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