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1 UNITED STATES PATENT AND TRADEMARK OFFICE

2
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4
5 TEXAS INSTRUMENTS INC.,

6 Petitioner

7 v.

8 PARKERVISION, INC.,

9 Patent Owner

10
11 Case IPR2024-00935

12 Patent No. 7,865,177

13 Case IPR2024-00936

14 Patent No. 9,118,528

15 Our Ref. 12189-0091IP1 and 12189-0092IP1

16
17 REMOTE ORAL DEPOSITION OF

18 DAVID SORRELLS

19 Middleburg, Florida

20 May 23, 2025 - 9:02 a.m.

21 Reported by:

Micheal A. Johnson, RDR, CRR

22 Job No. J12871997

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1 REMOTE ORAL DEPOSITION OF DAVID SORRELLS,
2 produced at the instance of the Petitioner, in the
3 above-styled and numbered cause on the 23rd day of
4 May, 2025, at 9:02 a.m., before Micheal A. Johnson,
5 RDR, CRR, reported by realtime stenographic means,
6 at the location of the witness, Middleburg, Florida,
7 pursuant to Notice of Oral Deposition.

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May 23, 2025

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DEPOSITION EXHIBITS
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NUMBER	DESCRIPTION	PAGE
Exhibit 2016		9

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1 PROCEEDINGS

2 DAVID SORRELLS

3 having been first duly sworn, testified as follows:

4 EXAMINATION

5 BY MR. GRISWOLD:

6 Q. Okay. My name is Josh Griswold and I
7 represent Texas Instruments and I'll be taking your
8 deposition today, Mr. Sorrells. Have you been
9 deposed before?

10 A. Yes, sir.

11 Q. Okay. And how many times?

12 A. I happen to have an accurate count
13 because of the last time. I believe 14, but never
14 in terms of an IPR deposition.

15 Q. Okay. So you understand that I'm going
16 to ask you some questions today and you're under
17 oath and obligated to answer those questions and
18 answer truthfully; is that right?

19 A. Yes, sir, I do understand that.

20 Q. Okay. And is there any reason you'll not
21 be able to answer truthfully and accurately the
22 questions that I ask?

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1 A. No, sir, there's no reason.

2 Q. Perfect. Okay. And so I'm going to ask
3 you questions. If you don't understand a question,
4 feel free to ask me to rephrase or clarify the
5 question. You understand that?

6 A. Yes, sir.

7 Q. Okay. And during this depo, I'm going to
8 try to stop occasionally and give us all a break;
9 but if you need a break, let me know and we can stop
10 for a bit.

11 A. Thank you. I typically don't, so it
12 would be unusual for me to ask for the break.

13 Q. Understood. And then this depo
14 transcript is going to be used in a proceeding
15 before the Patent Trial and Appeal Board and they're
16 going to rely on your answers. Do you understand
17 that?

18 A. For the first time, yes, sir. I've never
19 done an IPR deposition, but you're going to get
20 truthful answers, so we're good.

21 Q. Understood. Okay. Is there anybody else
22 in the room with you?

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1 A. No, sir.

2 Q. Do you have any paper documents or notes
3 with you?

4 A. No. During COVID some of my depositions,
5 so I have a computer screen, a microphone, a mouse
6 and a keyboard. So anything else you -- I would
7 have to go and retrieve. So there's nothing near
8 me, around me or whatever. Oh, let me put my phone
9 on silent. I apologize for that one. And I will --
10 I tell you what, I will turn it off. How about
11 that?

12 Q. And I put a document into the chat. I'll
13 introduce that in a second, but other than that
14 document, do you have any electronic documents or
15 notes with you?

16 A. No, sir.

17 Q. Okay. And you'll tell me --

18 A. It's up on the screen, by the way. The
19 document you sent me is up on the screen. I don't
20 know if you want it there or not, but it's up.

21 Q. And if you need to refer to or if you
22 refer to another document or any notes other than

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1 something that I've given you, you'll let me know?

2 A. Yes, sir.

3 Q. So let's start with Exhibit 2016. I've
4 put that into the chat previously. It's premarked.
5 It's a document in this proceeding that was filed by
6 the patent owner, ParkerVision, Incorporated, and
7 it's entitled Declaration of David Sorrells. Do you
8 have that document in front of you?

9 A. Yes, sir. And it's open to the first
10 page that you just described.

11 Q. Okay. And do you recognize this
12 document?

13 A. Yes, sir. It's a declaration -- it's my
14 declaration for the -- concerning the '177 patent.

15 Q. Okay. And did you draft this document?

16 A. I worked with attorneys to draft this
17 document.

18 Q. Okay. And can you tell me what you did
19 to work with attorneys to draft this document?

20 A. I believe the work would be -- they
21 interviewed me, I made some notes, I wrote things
22 down, and we went through together two or three

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1 databases, the Relativity database, file explorer,
2 which I'm a Mac guy, that was on Windows, so it was
3 a little cumbersome for me, and some documents that
4 I believe were taken from Relativity and put into an
5 Excel spreadsheet. So I helped them determine what
6 I thought was most significant in terms of, you
7 know, the chip layouts that you see and the
8 timelines and, you know, what I remember. And so it
9 was somewhat nice to see all these documents -- how
10 would I say it? -- support my recollection of what
11 happened.

12 Q. Okay. But you've read this document
13 through top to bottom?

14 A. Yes, sir.

15 Q. And you support everything that was said
16 in it?

17 A. To the best of my ability. And if
18 there's anything you want to discuss that -- you
19 know, that might be in error in any way, I'm happy
20 to do that. But right now it's -- it's -- I believe
21 it to be true and accurate.

22 Q. Okay. And just really quick, the very

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1 last page of the document, page 15.

2 A. Let me look. Yes, sir.

3 Q. It says: I declare under penalty of
4 perjury that the foregoing is true and correct to
5 the best of my knowledge.

6 Do you see that?

7 A. Yes, sir.

8 Q. And you've signed the document?

9 A. I've signed it and I agree with the
10 statement.

11 Q. Okay. Excellent.

12 All right. Let me refer you to
13 paragraph 2 of the document. It's on page 2 of the
14 PDF, sort of at the beginning.

15 A. It's: I, David Sorrells, have personal
16 knowledge, is that the one?

17 Q. The numbered paragraph 2. The first is
18 I'm over 18 years old and the second one --

19 A. Oh, I see. That's a paragraph. My
20 apologies. Yes, I'm there.

21 Q. And I'm going to refer to the documents
22 by the paragraph numbers when I want to talk about

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1 something.

2 So it says here in paragraph 2 that you
3 were the Chief Technology Officer at ParkerVision
4 from 1996 to 2020; is that correct?

5 A. Yes, sir.

6 Q. And were you an employee at ParkerVision
7 during this time?

8 A. I've been an employee of ParkerVision
9 since its inception. I believe the pen was stroked
10 in 1990.

11 Q. Okay.

12 A. To date, yes, sir.

13 Q. And if you'll look at paragraph 4, you
14 describe that you led the research, design,
15 development, evaluation, and testing of
16 ParkerVision's down-conversion technology.

17 Do you see that?

18 A. Yes, sir.

19 Q. Is leading the research, design,
20 development, evaluation, and testing of
21 ParkerVision's down-conversion technology, was that
22 one of your responsibilities as the CTO?

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1 A. It was before and during my CTO tenure,
2 yes, sir.

3 Q. Okay. Were there other responsibilities
4 as CTO?

5 A. No. My first -- I had other
6 responsibilities before that, but when I became CTO,
7 this became my major focus, yes, sir.

8 Q. Okay. You say "major focus." Were there
9 minor focuses?

10 A. So we had just finished developing a
11 product called [REDACTED]. And so that was kind of
12 the impetus of the development of this technology.
13 So occasionally I would do -- I would answer
14 questions or whatnot, you know, concerning
15 [REDACTED]. But I would say -- if I could put a
16 percentage on it, 95 percent of my time has been --
17 was spent in what we call the advanced research and
18 development group.

19 Q. Okay. So referring back to paragraph 2,
20 it says you're currently the Senior Technical
21 Strategist; is that correct?

22 A. Yes, sir.

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1 Q. Okay. And do I understand correctly that
2 you're still an employee of ParkerVision, Inc.?

3 A. Yes, sir.

4 Q. Okay. And how are you paid as the Senior
5 Technical Strategist?

6 A. Biweekly. Is that what you're looking
7 for?

8 Q. Are you paid a salary?

9 A. Yes, sir.

10 Q. Okay. Are you paid bonuses?

11 A. I have been paid bonuses in the past,
12 yes, sir.

13 Q. Do you know what your bonuses are based
14 on?

15 A. You're going to have to ask Mr. Parker
16 that. He -- I -- if I could put a broad category on
17 there, it's performance based on what he asked me to
18 do and how I've delivered.

19 And offering something up, you know, I
20 also receive occasionally some stock or options
21 associated with my performance.

22 Q. Okay. So when ParkerVision has a good

1 year, your stock is worth more. Is that fair to
2 say?

3 MS. LEPORE: Objection, vague.

4 A. I will just say this, sir. You know,
5 I've never been able to determine what moves
6 ParkerVision's stock up and down personally.

7 BY MR. GRISWOLD:

8 Q. Understood. Understood. So is your
9 responsibility as Senior Technical Strategist, is it
10 still to lead research, design, development,
11 evaluation, and testing of ParkerVision's
12 sound-conversion technology?

13 A. No, sir. That responsibility is I help
14 Jeff look at business and technology opportunities
15 that ParkerVision may want to participate in.

16 Q. And what do you mean by look at business
17 and technology opportunities?

18 A. Well, we have other technologies that we
19 are looking at bringing into the marketplace. And
20 so I've been -- for Jeff I've been doing work of
21 looking at different companies and different types
22 of technology and where it would be best applied for

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1 ParkerVision. So business development but from a
2 very specific technical aspect, not general
3 business.

4 Q. Okay. Is there another CTO at
5 ParkerVision? Does ParkerVision -- strike that.

6 Does ParkerVision currently have a CTO?

7 A. I don't believe so. I think I held the
8 title and Greg held the title for a period of time,
9 but to my knowledge I don't believe we have a CTO at
10 the -- I resigned -- I pulled down from that
11 position when it was no longer necessary.

12 Q. And why was it no longer necessary?

13 A. The company has shrunk considerably.
14 It's awful hard for me to maintain a C-level -- you
15 know, personally to maintain a C-level position when
16 we're all in the trenches together.

17 Q. Okay. Is there another that leads
18 research, design, development, evaluation, and
19 testing of ParkerVision's down-conversion
20 technology?

21 A. Well, to be clear, you know, I don't lead
22 it, but I -- I -- you know, I have -- you know, I

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1 have that responsibility and also the responsibility
2 of supporting the lawsuits also, which is one of the
3 reasons, you know, I'm here today. But as far as
4 leading goes, we have, as you know, Greg Rawlins,
5 Dr. Rawlins now, he works with Jeff on some
6 technical analysis. So that's the -- that's what I
7 can tell you. I don't know what -- I don't know
8 what you'd call lead or not lead, but he certainly
9 works on technical analysis for ParkerVision.

10 Q. Okay. You mentioned that you support the
11 lawsuits.

12 A. Yes, sir.

13 Q. And is that part of your role as a Senior
14 Technical Strategist?

15 A. It's part of my role as employee/inventor
16 of ParkerVision. I don't really put it under the
17 senior technical -- I do no legal strategy
18 whatsoever. What I have learned is everything
19 outside of technical is a legal document and I have
20 no opinion. That's what I've learned in my 14
21 depositions.

22 Q. Okay. What do you do in support of the

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1 lawsuits?

2 A. Mainly I am available if -- for example,
3 to help develop a document just like the one you're
4 looking at right now. So if there's any history --
5 I'm kind of invention story guy, if there's any
6 questions with that. All of our attorneys have
7 figured out that they have all the documents in the
8 world I -- you know, so occasionally I help identify
9 one by memory. I say can we find this one or that
10 one or that type of thing. I would -- I would
11 basically -- you know, it's mainly logistics
12 support.

13 Q. You said the attorneys have all the
14 documents. Can you explain that?

15 A. Yes. So first off, lawsuits, even though
16 I've been involved in them since 2013, are still
17 somewhat of an enigma to me. So during the first
18 lawsuit -- I believe there's something called a
19 litigation hold. And so ParkerVision worked with
20 our IT department and the attorneys of record at the
21 time, I believe it was McKool Smith, and they came
22 in and they basically made copies of everything and

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1 put it in the database. All the e-mails, all the
2 technical -- a lot of the documents that you see in
3 this one that we're referring -- my declaration, you
4 know, I really haven't seen since the late '90s, but
5 they were in the database. So I was pleasantly
6 surprised they were. So that's what I mean by I
7 believe there was a very accurate and in-depth
8 preservation of the documents.

9 Q. You said that you were pleasantly
10 surprised that the documents were in the database.
11 When did you become pleasantly surprised? When did
12 you learn of the documents?

13 A. When I started looking at this particular
14 declaration. For example, there was layouts of the
15 first -- what we call the -- code named Eddie chip.
16 So to be able to find those and some of the PCB
17 boards that it was associated with, it brought back
18 pleasant memories and I was glad to see that there
19 was still -- I guess the legal term "evidence" of
20 this work.

21 Q. Okay. Was that in 2024?

22 A. The layouts that you see here, yes. Some

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1 of these documents I haven't seen since I helped
2 create them back in the '90s. Like some of the PC
3 board files, you know, the spice files, all of that.
4 And that's what I attempted to communicate earlier
5 was is it was nice to see everything kind of line up
6 and build the timeline as I remembered it.

7 Q. Thank you. Can I refer you to
8 paragraph 29 of your declaration. That's near the
9 back.

10 A. Yes, sir, I'm there.

11 Q. So paragraph 289 says: ParkerVision
12 files related to the design, development, testing,
13 and/or evaluation of the Eddie chip and circuit
14 board discussed above are maintained in a Relativity
15 database, correct?

16 A. Yes, sir.

17 Q. Okay. And what is a Relativity database?

18 A. Well, the way that I understand it and
19 the way I used it in this document was is it is a --
20 it's a searchable database. But what was
21 particularly important here was having the metadata
22 available. You can pull the metadata, when the

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1 files were created, when they were last modified,
2 that type of thing. So you can search by name, but
3 it also has additional information that's not
4 apparent just looking at the file itself.

5 Q. And is the -- is it fair to say the
6 Relativity database is stored on a hard drive or a
7 server someplace?

8 A. I don't know where it's stored. I will
9 tell you that it was readily available when I was
10 looking at it with the attorneys.

11 Q. Do you know who maintains the server or
12 hard drive that has the Relativity database?

13 MS. LEPORE: Objection, calls for
14 speculation.

15 A. This is a deposition, so I can only
16 guess. If you want me to guess, I will, but just
17 know that it's speculation.

18 BY MR. GRISWOLD:

19 Q. Understood. So you don't know? You
20 would have to guess?

21 A. Yes.

22 Q. Does ParkerVision maintain the hard drive

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1 or the server that has the Relativity database?

2 A. I believe the way it works is is our
3 attorneys maintain the database and new information
4 is sent to them on a regular basis.

5 Q. Okay.

6 A. That's pseudo speculation, sir, if I
7 could -- but I believe that's how it's done.

8 Q. Understood. Thank you.

9 Do you have access to this Relativity
10 database?

11 A. Me personally, I do not, no. I worked
12 with the attorneys, but, no, I do not have access to
13 it.

14 Q. Okay. In paragraph 30 -- well, at the
15 bottom of paragraph 29 it says: A search of the
16 database was run.

17 A. Yes.

18 Q. Did you perform that search?

19 A. I did with the attorneys, yes. I was --
20 I was present and we decided what files that we
21 would ask for -- you know, the file extensions that
22 we would ask the Relativity to fork over, and then I

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1 did translation for people, like what is an ERR
2 file. And that's a design rule check error for PC
3 boards. This was the result of that search.

4 Q. In paragraph 30 it says the results of
5 the search were exported to an Excel spreadsheet,
6 which is shown in Figure 2029. Do you mean
7 Exhibit 2029?

8 A. I'm sure -- you know, forgive me. That's
9 probably my error, sir. Yes, it's a giant -- you've
10 probably seen it. It's a long list of files that,
11 as far as I know, it's exhaustive. It's everything
12 we have with these search parameters.

13 Q. In paragraph 29, again, it says: The
14 Relativity database shows metadata including file
15 name, extension -- excuse me, file extension, file
16 name, and last modified date of these files; is that
17 correct?

18 A. Yes, sir.

19 Q. Do you know that the metadata that is
20 reflected in this database is current?

21 A. Well, I have certainly assumed it to be.
22 Everything kind of lines up. And just so you know,

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1 it was our convention that we would typically mark a
2 schematic or design with the date on it, the day
3 that it was created. And so the few that are in
4 here, the dates line up with what's physically
5 written on the file and what the -- what Relativity
6 database showed -- came out with.

7 Q. The list in Exhibit 2029, did you check
8 the date on the document relative to the metadata
9 for each of those documents?

10 A. Not for each one, no, sir. You know, it
11 forked over a lot of them and so the decision was
12 made to put everything that it forked over into the
13 database. So, no, sir, I did not check each
14 individual entry.

15 Q. Okay. Do you know if Relativity was used
16 by ParkerVision in 1997-98?

17 A. I'm pretty comfortable with the answer of
18 no.

19 Q. Do you know how the files got from
20 ParkerVision into Relativity?

21 A. The answer is I do not know specifically.
22 I just know that since the initial lawsuit we --

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1 we're involved in with Qualcomm that the database
2 has been treated, you know, by us and the attorneys
3 as a repository. I do not know where that
4 repository is physically.

5 Q. The suit with Qualcomm that you're
6 referring to, is that 2014 time frame? Do you know
7 that?

8 A. Yes, sir, it was -- I think it -- I think
9 it was -- I believe -- if memory serves, it was at
10 the end of 2013. But I think somewhere around 2011
11 or 2012 is when we filed the complaint and that's
12 when the litigation hold started.

13 Q. Thank you.

14 A. So I was told never to delete anything
15 again.

16 Q. So do you know where these files were
17 stored when they were stored by ParkerVision?

18 A. Yes. We had an IT department, an
19 in-house IT department, and I believe it was
20 determined that we needed an external IT department
21 to help us maintain these databases. So the current
22 company we use is called Venture Pointe. And they

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1 capture everything for us on a daily basis. But
2 this is -- by the way, there's a long gap between
3 what I just said -- there's decades between, you
4 know, when we started and what we're doing today.
5 But we went to professional management pretty
6 quickly because of the size of the database.

7 Q. And you say that Venture Pointe captures
8 data files from ParkerVision's hard drives or
9 servers; is that correct?

10 A. We just had that happen again. About a
11 month ago we all took our computers in again and
12 they made full copies of the drive. So this happens
13 on a routine and regular basis.

14 Q. Did this happen in 1997?

15 A. Yes. No, no, no, forgive me. It
16 happened -- no, it happened when the lawsuit
17 started. So there is -- there was no litigation
18 hold between when this work was done and the first
19 lawsuit. That's the first time I ever heard of that
20 term. So, no, sir, none of these were -- this was
21 all just as a result backed up on all of our hard
22 drives. And so it was captured in, I assume, 2011

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1 or 2012 when the attorneys came through and did --
2 and by the way, they pulled everything. They went
3 through our servers, our laptops. It was a very
4 thorough document capture.

5 Q. You referred to both hard drives and
6 servers of ParkerVision. Do you know which files
7 were stored on a server and which files were stored
8 on a hard drive?

9 A. I don't. And the reason I don't is when
10 we were doing chip designs, these were -- integrated
11 circuits, these were very expensive designs with
12 literally millions of details. So there was a
13 pretty sophisticated backup system that we used to
14 capture everything. And we didn't -- if it helps
15 you, we didn't discriminate, right. It was like its
16 own machine. So I consider it -- personally, which
17 I'm sure IT would disagree with me, I would
18 consider -- when I use the word "hard drive,"
19 typically I'm referring to a PC and then I say
20 server. But of course that's what's in a server
21 also is multiple hard drives. So apologies for any
22 confusion. But somewhere it exists and, you know,

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1 I'm sure that you will be able to find out where
2 that is with somebody more informed than me.

3 Q. So how big was your team that you led in
4 the development of down-conversion technology?

5 A. Well, the names are on the initial
6 patent, so there was myself, Mike Bultman, Robert
7 Cook, Charlie Moses and Richard Looke. So there
8 were five members of the team.

9 Q. And did you have a standard procedure for
10 you and the other five members of the team for when
11 a document would be stored on their personal
12 computer versus on the server?

13 A. At the time I did not. We were in
14 research and development. We -- so the way it -- if
15 I could describe the environment, I set us up in a
16 corner of the building and we had that -- that
17 corner so that we could talk to each other, raise
18 your hand, say look at this, that. The test
19 equipment and design stuff was in the center so
20 everybody could use it. And we were at the time --
21 we had a pretty streamlined method of somebody with
22 an idea, how it could be simulated, how it could be

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1 tested, built and evaluated. So we spent most of
2 our time going through literally hundreds of
3 different types of prototypes and evaluation boards.
4 And then we would all get together multiple times
5 per week and say what did we learn, you know, what
6 works, what doesn't, that type of thing. That
7 was -- if that could describe the environment.

8 So from a document standpoint, it was not
9 a sophisticated, you know, retention program. We
10 didn't delete things just because we had enough hard
11 space to -- you know, I mean, we -- it just worked
12 out that, you know, we would go now -- and we
13 figured out, by the way, a year or so into this was
14 very useful to be able to refer back to some of the
15 original experiments. So it was done voluntarily,
16 certainly not in any sophisticated or organized way.

17 Q. Okay. And do you know that when lawyers
18 came in and imaged everything, do you know that they
19 captured everything that was on the hard drives and
20 servers of your team?

21 A. I can only tell you what --

22 MS. LEPORE: Compound.

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1 THE WITNESS: I'm sorry.

2 MS. LEPORE: That's okay.

3 A. I can only tell you what my direction was
4 from Mr. Parker, and that was give them everything.

5 BY MR. GRISWOLD:

6 Q. Okay.

7 A. So if we had -- what that means, sir, is
8 if we had an older computer that hadn't been used in
9 a while, they got that too.

10 Q. And do you know whether the lawyers have
11 collected further files since the original file
12 collection that was performed by McKool Smith?

13 A. Well, again, the only way I can say this,
14 and I really -- you know, just realize I'm answering
15 to the best of my ability. The only way I can say
16 this is less than a month ago they went and captured
17 everything I had again. So I am assuming they've
18 been very thorough. Because to date, from my
19 perspective, they have been.

20 Q. Do you remember them capturing any
21 documents prior to a month ago other than the
22 original --

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1 A. Yes.

2 Q. -- capture?

3 A. Yes, yes. That's what I meant by regular
4 basis. Occasionally I'll get phone calls from our
5 IT, Venture Pointe, right, and they're, like, bring
6 your computers in. And they do a full hard drive
7 image, right. So they can see any files I've
8 deleted or -- you know, it's much more than just
9 what's on the machine. There's probably a lot of
10 history, you can see when I accessed what. But it's
11 a full hard drive image.

12 Q. And do you know if the lawyers have
13 access to the Venture Pointe backups?

14 A. They ordered it.

15 Q. They ordered it. Okay.

16 I know we haven't been going for very
17 long, but can you give me ten minutes for a break,
18 please.

19 A. Sir, this is your deposition. And I'm,
20 by the way, incredibly happy to be doing it
21 remotely, so I'm on your schedule.

22 MR. GRISWOLD: Okay. Let's go off

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1 record.

2 MS. LEPORE: That's fine with me as
3 well.

4 (Recess taken from 9:34 a.m. to
5 9:47 a.m.)

6 MR. GRISWOLD: We have no further
7 questions. We surrender the witness.

8 MS. LEPORE: Okay. We have no
9 questions for the witness as well.

10 (Deposition concluded at 9:47 a.m.)

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CHANGES AND SIGNATURE

DAVID SORRELLS

FRIDAY, MAY 23, 2025

PAGE/LINE	CHANGE	REASON

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1 I, DAVID SORRELLS, have read the foregoing
2 deposition and hereby affix my signature that same
3 is true and correct except as noted herein.

4

5

6

DAVID SORRELLS

7

8

9 STATE OF _____)

10 COUNTY OF _____)

11

12

13 Subscribed and sworn to before me by the
14 said witness, DAVID SORRELLS, on this the _____
15 day of _____, 2025.

16

17

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NOTARY PUBLIC IN AND FOR
THE STATE OF _____

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22 My Commission Expires: _____

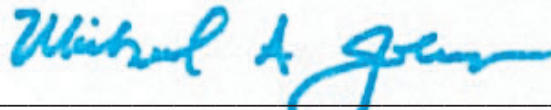
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REPORTER'S CERTIFICATION

I, Micheal A. Johnson, Registered Diplomate Reporter and Certified Realtime Reporter, certify that on the 23rd day of May, 2025, I reported the Remote Oral Deposition of DAVID SORRELLS, after the witness had first been duly cautioned and sworn to testify under oath; said deposition was subsequently transcribed by me and under my supervision and contains a full, true and complete transcription of the proceedings had at said time and place; and that reading and signing was not requested.

I further certify that I am neither counsel for nor related to any party in this cause and am not financially interested in its outcome.

GIVEN UNDER MY HAND AND SEAL of office on this 27th day of May, 2025.



MICHEAL A. JOHNSON, RDR, CRR
NCRA Registered Diplomate Reporter
NCRA Certified Realtime Reporter

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