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Transcript of Lydia Grote

Date: April 18, 2025

Case: Ascend Elements, Inc. -v- Duesenfeld GmbH (PTAB)

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

Transcript of Lydia Grote
Conducted on April 18, 2025

1 (1 to 4)

1	IN THE UNITED STATES PATENT AND TRADEMARK OFFICE ----- BEFORE THE PATENT TRIAL AND APPEAL BOARD ----- ASCEND ELEMENTS, INC., Petitioner, v. DUESENFELD GMBH, Patent Owner. ----- IPR2024-00948 Patent 11,050,097 ----- VIRTUAL DEPOSITION of LYDIA GROTE FRIDAY, APRIL 18, 2025 11:03 a.m. CET Job No.: 579323 Pages: 1 - 81 Reported by: Audrey Shirley, QRR, ACR, FMBIVR	3
2	A P P E A R A N C E S ON BEHALF OF THE PETITIONER: CONOR McDONOUGH, ESQUIRE GISH PLLC 41 Madison Avenue Floor 31 New York, NY 10010 Tel: (212) 518-7380 ON BEHALF OF PATENT OWNER AND THE WITNESS: STEVEN C. CARLSON, ESQUIRE ROBINS KAPLAN LLP 555 Twin Dolphin Drive Suite 310 Redwood City, CA 94065 Tel: (650) 784-4040 ALSO PRESENT: Elisabeth Frank-Gro ebner - Interpreter	4
2	Virtual Deposition of LYDIA GROTE Pursuant to notice, before Audrey Shirley, Qualified Realtime Reporter, Accredited Court Reporter and Fellow of the British Institute of Verbatim Reporters.	4
2	I N D E X Witness Examination Page Lydia Grote By Mr McDonough 8 E X H I B I T S (Attached to the transcript) Exhibit No. Description Page No. 1 Declaration by Lydia Grote 12 No. 2 Document entitled "Licensing of Duesenfeld patents" 14 No. 3 Duesenfeld GmbH Brochure 21 No. 4 Certification Letter (in English) 38 No. 5 Duesenfeld Financials 2021/2022 (in English) 41 No. 6 Duesenfeld Financials 2021/2022 (in German) 43 No. 7 Document bearing Bates No DUESENFELD_IPR00000207 45 No. 8 Document bearing Bates No DUESENFELD_IPR00000208 46	4

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2 (5 to 8)

5			7		
1	Exhibit No.	Description	Page	1	the interpreter followed by the witness and we can
2	No. 9	Seval Agreement	59	2	proceed.
3	No. 10	RiPlastic Agreement	64	3	
4	No. 11	Document bearing Bates No	68	4	THE INTERPRETER, was duly sworn to translate from
5	No. 12	Document bearing Bates No		5	English into German and from German into English to
6		DUESENFELD_IPR00000154	69	6	the best of her ability
7	No. 13	Document bearing Bates No		7	
8		DUESENFELD_IPR00000207	73	8	MS LYDIA GROTE, having been previously duly
9				9	identified and warned of the penalties of perjury,
10				10	was examined and testified as follows:
11				11	
12				12	THE INTERPRETER: Just to make sure that
13				13	everybody understands, I just explained to the
14				14	witness what the procedure is now because she was
15				15	expecting something to be translated.
16				16	MR McDONOUGH: Okay.
17				17	THE INTERPRETER: Audrey, I think you can
18				18	go ahead. The witness is now aware of the
19				19	procedure.
20				20	THE COURT REPORTER: Counsel, we can
21				21	begin.
22				22	THE INTERPRETER: All right.
6			8		
1	THE VIDEOGRAPHER: Good morning. Here		1	EXAMINATION	
2	begins the videotaped deposition of Lydia Grote in		2	BY MR. McDONOUGH:	
3	the matter of Ascend Elements, Inc. v Duesendfeld		3	Q. Good morning, Ms. Grote, thanks for	
4	GmbH in the United States Patent and Trademark		4	attending today. I just want to go over some	
5	Office, Case No. 2024-00948.		5	ground rules.	
6	Today's date is April 18th, 2025, and the		6	First off, have you had your deposition	
7	time is 11.03 a.m.		7	taken before?	
8	The videographer today is Wendy Viner on		8	A. I've never done a deposition before.	
9	behalf of Planet Depos.		9	Q. Okay. So, I just want to familiarize you	
10	This video deposition is taking place		10	with how this will go. I'm sure you've had some	
11	remotely.		11	discussions with your counsel about how this is	
12	Could I ask counsel to please identify		12	meant to go. I'm going to ask questions and	
13	themselves and state whom they represent.		13	you're to answer those questions to the best of	
14	MR. McDONOUGH: Conor McDonough of Gish		14	your knowledge and ability. If there's anything	
15	PLLC on behalf of Ascend Elements, Inc.		15	unclear about any question I've asked, please	
16	MR. CARLSON: Steven Carlson from Robins		16	don't hesitate to ask for clarification.	
17	Kaplan LLP on behalf of Duesendfeld and the		17	A. Okay, thank you.	
18	witness.		18	Q. And this is probably built into the	
19	THE VIDEOGRAPHER: Thank you. Our court		19	process because we have a translation happening,	
20	reporter today is Audrey Shirley on behalf of		20	but it's important that your counsel might want to	
21	Planet Depos.		21	interpose objection or objections to the question	
22	Would the court reporter please swear in		22	or questions that I ask. So it's good for there	

9 1 to be a bit of a pause after I ask the question so 2 that the translator -- the translator can pause to 3 allow opposing counsel to enter those objections 4 if one is coming. That's important, too. 5 A. Okay. 6 Q. Is there any -- your counsel might object, 7 even if your counsel does object, it is important 8 that you still answer the question. The only time 9 you would be permitted to not answer the question 10 if your counsel instructs you not to answer the 11 question at which point it is up to you whether or 12 not to follow that instruction. But unless the 13 instruction is not to answer, the objection still 14 means that you do need to answer the question. 15 A. Okay. 16 Q. As you sit here today, is there any reason 17 that you might not be able to give truthful and 18 accurate testimony during this deposition? 19 A. No, there is no reason. 20 Q. So, are you currently employed? 21 A. I am the managing director of two 22 companies. Soon they're going to be three	11 1 before I took over as managing director of 2 Duesenfeld GmbH. However, I was not the managing 3 director of Gingko Investment GmbH from the very 4 start. 5 Q. How long have you worked at Duesenfeld 6 GmbH? 7 A. I think I was registered as the managing 8 director in the first or second week of January 9 2024. 10 Q. And so before January of 2024 you didn't 11 have any role at Duesenfeld GmbH? 12 A. Only as the managing director of the 13 company that owns Duesenfeld GmbH but, of course, 14 also with an interest of seeing successful 15 development. 16 Q. And you said "the company that owns 17 Duesenfeld GmbH", which company is that? 18 A. That's Gingko Investment GmbH. 19 Q. And how long have you worked with Gingko 20 Investment GmbH? 21 A. I'd have to look that up. To be honest 22 I don't know that from the top of my head.
10 1 companies. 2 Q. What are those companies? 3 A. Duesenfeld GmbH, Gingko Investment GmbH 4 and then there is a third one Duesenburg Energy 5 GmbH which is currently in formation. 6 THE WITNESS: Duesenfeld, sorry. Nicht 7 Duesenburg. 8 THE INTERPRETER: Duesenfeld, apologies. 9 My slip of the tongue as an interpreter. 10 BY MR. McDONOUGH: 11 Q. What is your role at Duesenfeld GmbH? 12 A. I am the managing director. 13 Q. And what does that role entail? 14 A. I have to bring the company forward so it 15 is successful. 16 Q. How long have you had that role? 17 A. I've only been the manager -- managing 18 director since last year. 19 Q. Did you have a different role at 20 Duesenfeld GmbH before that? 21 A. I am still the managing director of the 22 owner of Duesenfeld GmbH and I had that role	12 1 Q. Okay. I'd like to go ahead and show you 2 what's going to be Exhibit 1. I think that's 3 going to be shared on the screen. 4 (Exhibit Grote No. 1 was marked for 5 identification.) 6 BY MR. McDONOUGH: 7 Q. Can you see that document? 8 A. Yes. 9 Q. Do you recognize that document? 10 A. Yes, I have a translation of it before me. 11 Q. And what is this document? 12 A. It's a statement, a declaration of myself 13 vis- -vis the Patent and Trademark Office of the 14 United States. 15 Q. And just to confirm, you said you have 16 a translation of this document with you? 17 A. Yes. 18 Q. Do you have any other documents with you 19 at this time? 20 A. The schedules are for this document, 21 I printed out a large part of them, not all of 22 them, though.

13 1 Q. Have you made any notations or marks on 2 those documents? 3 MR. CARLSON: You can answer that yes or 4 no. 5 THE WITNESS: Yes. 6 BY MR. McDONOUGH: 7 Q. Okay. Were those notations or marks made 8 in consultation with your counsel? 9 MR. CARLSON: You can answer that yes or 10 no. 11 THE WITNESS: No. 12 BY MR. McDONOUGH: 13 Q. So those marks or notations are your own 14 notes? 15 MR. CARLSON: You can answer that yes or 16 no. 17 THE WITNESS: Yes. 18 BY MR. McDONOUGH: 19 Q. All right, we'll revisit whether we want 20 to ask for some of those or all of those documents 21 as exhibits but for the moment can you turn to the 22 last page of Exhibit 1.	15 1 the bottom of the first page is visible. 2 BY MR. McDONOUGH: 3 Q. Can you see the URL on the bottom left? 4 A. Yes. 5 Q. Is it correct that that's Duesenfeld's 6 website? 7 A. I think this is correct. I did not really 8 compare this text word for word, but I think it is 9 correct. 10 Q. There's no reason to doubt that this is 11 taken from Duesenfeld's website? 12 A. I can give it a quick check. 13 Q. If you need to, please. 14 A. Yes, this is part of the page. 15 Q. Right, thank you. 16 If you look at the first page, there's 17 a paragraph that begins: 18 "As a spin-off of TU Braunschweig ..." 19 Do you see that paragraph? 20 MR. CARLSON: Which -- are we talking 21 about Exhibit 1 or 2? 22 MR. McDONOUGH: Exhibit 2.
14 1 A. Yes. 2 Q. Do you see the signature at the bottom? 3 A. Yes. 4 Q. Is that your signature? 5 A. Yes. 6 Q. Thank you. Could you go to paragraph 4 of 7 Exhibit 1. So, looking at paragraph 4, it says: 8 "Duesenfeld's improved technologies falls 9 in several categories. For instance, Duesenfeld 10 has developed improved techniques for discharging 11 electricity from batteries which allows the energy 12 to be utilized and makes the process safer for 13 subsequent steps." 14 Did I read that correctly? 15 A. Correct. 16 MR. McDONOUGH: I'd like to -- this one's 17 going to be Exhibit 2. 18 (Exhibit Grote No. 2 was marked for 19 identification.) 20 MR. McDONOUGH: And it might be helpful to 21 enlarge the images to see in some of the ... 22 If we could just scroll to the -- so that	16 1 MR. CARLSON: Oh there, I see. 2 THE WITNESS: Yes. 3 BY MR. McDONOUGH: 4 Q. Part of that says: 5 "... hydrometallurgical processes have 6 been developed and patented from such cooperation 7 agreements. Further processes were developed 8 directly at Duesenfeld and patented. The LitoRec 9 process -- the LitoRec recycling process is based 10 on patents of Duesenfeld GmbH." 11 Did I read that correctly? 12 A. That is correct. It was read correctly. 13 Q. At the next paragraph it says: 14 "The Duesenfeld process ..." 15 Do you see that? 16 A. Yes. 17 Q. "... with discharging, mechanical crushing 18 of the batteries and further hydrometallurgical 19 processing of the Duesenfeld Black is 20 a low-temperature process." 21 Do you see that? 22 A. Yes.

17 1 Q. Is that saying that there's a Duesenfeld 2 process that has various aspects such as 3 discharging, mechanical crushing of batteries and 4 then further hydrometallurgical processing of the 5 Duesenfeld Black? 6 A. Yes, that's what we can read here. 7 Q. And what is "Duesenfeld Black"? 8 A. That's the black mass that emerges from 9 the low-temperature process. 10 Q. And what is the further hydrometallurgical 11 processing of the Duesenfeld Black? 12 A. It's a process for which we applied for 13 two patents and we also obtained patents in 14 several countries. 15 Would you like to hear how this process 16 works? 17 Q. Well, I guess my first question is you 18 mentioned there's -- there are patents. Is that 19 -- is the '097 Patent one of those patents? 20 A. No. The '097 Patent is the patent in 21 suit. 22 Q. And I should have mentioned, if I refer to	19 1 MR. CARLSON: Objection; calls for legal 2 conclusion. 3 THE WITNESS: In that case I would not 4 answer the question. 5 BY MR. McDONOUGH: 6 Q. Well, you can answer it. Maybe I can 7 rephrase it. 8 What patent or patent rights are being 9 referred to there? 10 MR. CARLSON: Objection; calls for legal 11 conclusion. 12 THE WITNESS: I would not want to answer 13 that question because I'm not a patent attorney 14 and I cannot say anything about that. 15 BY MR. McDONOUGH: 16 Q. So, as you sit here today, you're not sure 17 what patent or patents that statement is referring 18 to? 19 MR. CARLSON: Same objection; calls for 20 legal conclusion. 21 THE WITNESS: In that case, I do not wish 22 to answer that question. However, I can explain
18 1 the '097 Patent do you understand what I'm 2 referring to? I'm going to infer that you do, but 3 I just want to make sure that that was clear on 4 the record. 5 A. Yes. The '097 Patent is the vacuum drying 6 patent. 7 Q. And just for the record, just the full 8 patent number is US Patent No. is 11,050,097. 9 There's another paragraph that says: 10 "The process starts with deep discharging 11 of the batteries and using the energy." 12 Do you see that? 13 A. Yes. 14 Q. Then it reads: 15 "The patented Duesenfeld discharging 16 enables safe and efficient discharging of cells, 17 modules or packs connected in series." 18 Do you see that? 19 A. Yes. 20 Q. And just so I'm making sure, is the 21 patented Duesenfeld discharging, is that something 22 that it would include the '097 Patent?	20 1 the advantages of the discharge patent. 2 BY MR. McDONOUGH: 3 Q. Well, I will need you to answer the 4 question which I'll ask again is, as you sit here 5 today is it your testimony that you're not sure 6 which patent that statement refers -- patent or 7 patents that statement refers to? 8 MR. CARLSON: You can answer that. 9 THE WITNESS: This is the discharge patent 10 that we -- the process we developed for the safe 11 and efficient discharging of lithium-ion 12 batteries. 13 BY MR. McDONOUGH: 14 Q. If you look further down that paragraph, 15 there's a sentence -- a sentence that begins: 16 "Due to the defined deep discharge ..." 17 Do you see that? 18 A. Yes. 19 Q. So that sentence reads: 20 "Due to the defined deep discharge, there 21 is no further electrical risk involved in the 22 subsequent process steps. Duesenfeld discharging

21 1 ensures employee protection, process safety and 2 high efficiency." 3 Did I read that correctly? 4 A. Correct. 5 Q. Okay. If we go back to Exhibit 1, your 6 declaration, and look at paragraph 6. The last 7 sentence of that paragraph reads: 8 "Attached as [Exhibit] 2053 is a brochure 9 that describes the battery recycling process at 10 Duesenfeld's Wendeburg Plant." 11 Is that -- did I read that correctly? 12 A. Correct. 13 MR McDONOUGH: Okay. If we could bring up 14 Exhibit 3. 15 (Exhibit Grote No. 3 was marked for 16 identification.) 17 MR. McDONOUGH: If we could just scroll 18 down to make sure that the footer is visible. 19 BY MR. McDONOUGH: 20 Q. Do you recognize this as Exhibit 2053 to 21 your declaration? 22 A. Yes.	23 1 time. High discharge power." 2 Correct? 3 A. Correct. 4 Q. And is the patent being referred to here, 5 is that -- would that include, for example, the 6 discharge patent that you mentioned earlier? 7 MR. CARLSON: Objection; calls for legal 8 conclusion. 9 THE WITNESS: Well, I would not want to 10 answer that in that case. 11 BY MR. McDONOUGH: 12 Q. Well, I do need you to answer the question 13 which I'll just ask again is, earlier you had 14 mentioned, and we were talking about, the deep 15 discharge, an example of the discharging patent. 16 And I'm just asking is that one or more -- is that 17 an example of the patent that might be referred to 18 by this yellow box? 19 MR. CARLSON: Objection; vague. 20 THE WITNESS: Well, you can read out the 21 patent, it's been published. 22 I don't understand the question, actually.
22 1 Q. If you could turn to page 3. Maybe we 2 could zoom in on that. 3 So there's this diagram with a series of 4 boxes with text inside of it. Do you see this? 5 A. Yes. 6 Q. And there's a series of boxes, white boxes 7 with arrows proceeding to the left and also 8 indicating an annotation below. 9 A. Yes. 10 Q. So, is it fair to say this diagram is 11 intended to illustrate the different stages of 12 Duesenfeld's battery recycling process at its 13 Wendeburg plant? 14 A. Yes, it's one way of illustrating it. 15 Q. Okay. If you look at the first box on the 16 left it says, "Duesenfeld Discharging". Do you 17 see that? 18 A. Yes. 19 Q. And then above that there's a yellow box. 20 And in that box it says: 21 "Patent: Safe series connection enables 22 high voltages with low current flow at the same	24 1 BY MR. McDONOUGH: 2 Q. The patent that you just referred to, is 3 that different than the '097 Patent? 4 A. Yes. 5 Q. Okay. Then the next box, it doesn't have 6 a yellow box over it, it says "Disassembly". 7 A. Correct. 8 Q. Then the next -- the next box says, 9 "Duesenfeld mechanical process". 10 A. Correct. 11 Q. And below that there's a series of items 12 noted that says: 13 "Electrolyte, copper, aluminium, 14 Duesenfeld Blackmass ..." 15 And then in parentheses: 16 "... (graphite, cobalt, nickel, manganese, 17 lithium)." 18 Did I read that correctly? 19 A. Yes. 20 Q. What do these items refer to? 21 A. You mean the part: 22 "Electrolyte, copper, aluminum ..."?

25 1 Q. Maybe I could rephrase the question. 2 Is this meant to indicate that these are 3 products that are made by the Duesenfeld 4 mechanical process? 5 A. Yes. However, in this case it's NMC cell 6 chemistry not LFP. It always depends on the types 7 of batteries you put into the process. 8 Q. So this is not referring to processing of 9 lithium batteries? 10 A. Sure. NMC -- 11 MR. CARLSON: Oh wait -- is there a -- 12 wait for the translation, please. 13 THE WITNESS: It does refer to the 14 processing of lithium batteries. 15 BY MR. McDONOUGH: 16 Q. Okay. And then the yellow box above this 17 where it says: 18 "Patent: Drying below 80 degrees celsius 19 is only possible with the Duesenfeld patented 20 process." 21 Do you see that? 22 A. Correct, yes.	27 1 of your ability. 2 THE WITNESS: The '097 Patent does not 3 list a temperature limit, I believe. 4 BY MR. McDONOUGH: 5 Q. So is it your testimony that you're not 6 sure if this yellow box describing the Duesenfeld 7 mechanical process would include a reference to 8 the '097 Patent? 9 A. I'm not sure if I fully understand the 10 question. 11 The Duesenfeld process involves 12 temperatures below 80 degrees. We sent you 13 documents about that. So I don't fully understand 14 the question. 15 Q. Let me step to the next process, which is 16 the "Duesenfeld hydrometallurgical process", the 17 box on the right side of the page. Do you see 18 that? 19 A. Yes. 20 Q. And earlier we saw that this was described 21 as a process that's carried out on the Duesenfeld 22 Black which I understand is the Duesenfeld black
26 1 Q. And is the '097 Patent among the patents 2 being referred to here? 3 MR. CARLSON: Objection; calls for legal 4 conclusion. 5 THE WITNESS: And I would not answer that 6 because I'm not an attorney. 7 BY MR. McDONOUGH: 8 Q. Again, the objection is just lodged but 9 I do need you to answer the question. 10 MR. CARLSON: And I'll interject that you 11 can answer to the best of your ability. 12 THE WITNESS: Could you repeat the 13 question, please? 14 BY MR. McDONOUGH: 15 Q. Sure. The yellow box here says: 16 "Patent: Drying below 80 degrees celsius 17 is only possible with the Duesenfeld patented 18 process." 19 The question is: is the '097 Patent one of 20 the patents or patent -- among the patents being 21 referred to here? 22 MR. CARLSON: You can answer to the best	28 1 mass. Is that correct? 2 A. Correct. 3 Q. And what is the purpose of that process? 4 A. It's for winning back the items that are 5 listed below, that is cobalt sulfate, nickel 6 sulfate, lithium sulfate -- sorry, lithium 7 carbonate. What is listed below. 8 Q. In the yellow box above it says: 9 "Patent: Safe fluoride removal, 10 battery-quality end products." 11 Do you see that? 12 A. Yes. 13 Q. Is that referring to at least the -- well, 14 I guess I'll say it. Do you know what patent or 15 patents that's referring to? 16 MR. CARLSON: You can answer to the best 17 of your ability. 18 I object; calls for legal conclusion. 19 THE WITNESS: In some countries patents 20 for the hydrometallurgical process were already 21 registered. There were two in the US, one has 22 been obtained and the second hasn't been obtained

29 1 yet. But I'm not sure, so I would have to ask. 2 BY MR. McDONOUGH: 3 Q. Is the US patent that has been obtained 4 different than the '09 -- a different patent than 5 the '097 Patent? 6 MR. CARLSON: You can answer to the best 7 of your ability. 8 Objection; calls for legal conclusion. 9 THE WITNESS: '097 is about vacuum drying. 10 Hydrometallurgy concerns a different process and 11 different patents. 12 BY MR. McDONOUGH: 13 Q. Understood, thank you. 14 MR. CARLSON: Can we take a quick break? 15 I need to get resituated here. 16 MR. McDONOUGH: I've just got one more 17 question and then yes. 18 MR. CARLSON: That's fine. 19 BY MR. McDONOUGH: 20 Q. So if we look at this diagram, taken as 21 a whole, it's indicating -- it's fair to say that 22 this is indicating that with respect to each	31 1 You can answer to the best of your 2 ability. 3 THE WITNESS: We applied for patents and 4 we obtained patents for the discharge process, for 5 vacuum drying and the same for the 6 hydrometallurgical process. 7 BY MR. McDONOUGH: 8 Q. And I guess I'm just trying to get -- make 9 sure I understand. Does each of these yellow 10 boxes referring to a different set of patent 11 rights or applied for rights than the other boxes? 12 MR. CARLSON: Objection; calls for legal 13 conclusion, vague. 14 THE WITNESS: It's not easy to answer that 15 question because we have patent applications that 16 -- applications out that include some of the 17 discharge part. So I don't quite understand the 18 reason for the question. I can only repeat that 19 we have patents for the discharge of -- the 20 discharging, for the vacuum drying, and for the 21 hydrometallurgical process. 22 ///
30 1 step of the process there's a first set of patent 2 rights that cover Duesenfeld's discharging process 3 or discharging stage. Another set of patent 4 rights that cover the Duesenfeld mechanical 5 process, the drying below 80 degrees. And another 6 set of patent rights that cover the Duesenfeld 7 hydrometallurgical process. Is that accurate? 8 MR. CARLSON: Objection; calls for legal 9 conclusion. 10 You can answer to the best of your 11 ability. 12 THE WITNESS: I can say that we applied 13 for patents for discharging, vacuum drying and the 14 hydrometallurgical process, the further processing 15 of black mass. But I cannot say exactly which 16 patents have already been obtained and which 17 haven't been. 18 BY MR. McDONOUGH: 19 Q. But is it accurate to say that each of 20 these yellow boxes is intended to refer to 21 a distinct set of patent rights? 22 MR. CARLSON: Objection; vague.	32 1 BY MR. McDONOUGH: 2 Q. And can you say where the '097 Patent fits 3 into this diagram? 4 MR. CARLSON: Objection; calls for legal 5 conclusion. 6 THE WITNESS: I'm -- as I said, I'm not an 7 attorney. But I would say that it's the part 8 about the mechanical process, the vacuum drying. 9 MR. McDONOUGH: Okay. Steven -- 10 MR. CARLSON: Can we take a break? 11 MR. McDONOUGH: We can. 12 MR. CARLSON: I need to get resituated 13 here. 14 MR. McDONOUGH: Yeah, if you need to take 15 a break, this is a good time. 16 MR. CARLSON: Okay. I'm going to -- I'm 17 going to exit and I'll be back. 18 THE VIDEOGRAPHER: We are going off the 19 record. The time is 12:03. 20 (Brief recess taken 12:03 p.m. - 12.12 p.m.) 21 THE VIDEOGRAPHER: We are back on the 22 record. The time is 12:12.

33 1 MR. McDONOUGH: Could we put up Exhibit 3 2 again. 3 If we could turn to page 4. 4 BY MR. McDONOUGH: 5 Q. The first paragraph on this page says: 6 "The recycling of Lithium-Ion Batteries 7 starts with the patented deep discharge of the 8 batteries and the use of the energy." 9 Did I read that correctly? 10 A. Correct. 11 Q. And there are -- appear to be four bullet 12 points, the last of which says: 13 "Defined deep discharge - no further 14 electrical danger." 15 Do you see that? 16 A. Yes, that's what it reads. 17 (The court reporter asked 18 counsel to reposition his microphone.) 19 BY MR. McDONOUGH: 20 Q. Then the final paragraph says: 21 "Thanks to this patented technology, there 22 is no further electrical risk for any of the	35 1 MR. CARLSON: Same objections. 2 THE WITNESS: And what was the question? 3 BY MR. McDONOUGH: 4 Q. Is this paragraph accurate? 5 MR. CARLSON: I object that this goes 6 beyond the scope of the declaration. 7 MR. McDONOUGH: Paragraph 6 of the 8 declaration ends with: 9 "Attached as [Exhibit] 2053 is a brochure 10 that describes the battery recycling process at 11 Duesenfeld's Wendeburg Plant." 12 And this is that exhibit. So this is 13 a direct exhibit describing -- that fleshes out 14 the statement in the declaration and I'm just 15 asking if this is an accurate paragraph. 16 THE WITNESS: The same answer as before. 17 This is one possible description but it is not the 18 only one. You cannot actually describe this 19 process in five lines. 20 BY MR. McDONOUGH: 21 Q. Maybe I can pose this another way. 22 Is there anything inaccurate about this
34 1 subsequent process steps. There is no need for 2 [a] high-voltage trained personnel for the 3 subsequent optional disassembly of lithium-ion 4 battery packs, transports are safer. Duesenfeld 5 discharging of Lithium-Ion Batteries ensures 6 employee protection, process safety and high 7 efficiency." 8 Did i read that correctly? 9 A. Correct. 10 Q. And is this an accurate description of the 11 discharge process occurring at the Wendeburg 12 facility? 13 MR. CARLSON: Objection. This goes beyond 14 the scope of the declaration. I object. 15 MR. McDONOUGH: This is an exhibit 16 attached to the declaration, so I just want to ask 17 if this is an accurate description of this stage 18 of the process at the Wendeburg facility. 19 THE WITNESS: It is a possible description 20 but not an exclusive description. 21 BY MR. McDONOUGH: 22 Q. Is it accurate?	36 1 description, even if it may not be exhaustive? 2 MR. CARLSON: Same objection. It goes 3 beyond -- this goes beyond the scope of the 4 declaration. Objection; vague. 5 THE WITNESS: If the discharge process is 6 not reduced to only what is stated here, it is 7 correct. 8 BY MR. McDONOUGH: 9 Q. Okay, thank you. 10 Can we turn to page 6 of this exhibit. 11 The paragraph -- there's an image on the 12 page with a cargo vehicle, below that is 13 a paragraph starting "Our business". Do you see 14 that? 15 A. That's what it says here, yes. 16 Q. And it reads: 17 "Our business is the licensing of our 18 processes and patents. Our licensing partners are 19 car manufacturers, recycling companies, battery 20 manufacturers, chemical companies and automotive 21 suppliers." 22 Is that an accurate characterization of

37 1 Duesenfeld's business? 2 A. This is our main business. Of course we 3 also run a recycling plant. 4 Q. But there's nothing inaccurate about that 5 statement? 6 A. No. 7 Q. If we go back to your declaration, 8 paragraph 8. It begins with: 9 "In light of the stability of the black 10 mass ..." 11 Do you see that? 12 A. Yes. 13 Q. And that full sentence reads: 14 "In light of the stability of the black 15 mass produced by the Duesenfeld process, 16 Duesenfeld qualified for a special regulatory 17 status that its black mass is no longer regulated 18 as waste and, instead, it has product status." 19 Did I read that correctly? 20 A. Correct. 21 Q. Further down in that paragraph it says 22 that Exhibit 2043 is the certification of that	39 1 2019. 2 Q. You've just answered my next question, 3 I was just going to ask that this is late 2019 and 4 -- but you've already answered that question. 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 Q. Okay. 11 MR. McDONOUGH: If we could put Exhibit 1 12 back up. 13 BY MR. McDONOUGH: 14 Q. At the very bottom of the page, paragraphs 15 -- paragraph 8 it says: 16 "Duesenfeld has been shipping its black 17 mass to its ..." 18 -- and then it proceeds to the next page: 19 "... customers since at least 2019 and 20 has never had a complaint or issue relating to the 21 chemical stability of the black mass." 22 Did I read that correctly?
38 1 product status under those regulatory -- under 2 those regulations. Is that right? 3 A. Correct. 4 Q. And an English translation of that 5 certification is attached as Exhibit 2044. 6 Correct? 7 A. I think so, yes. I'd have to look it up, 8 though. 9 MR. McDONOUGH: Okay, well why don't we -- 10 can we put Exhibit 4 up. 11 (Exhibit Grote No. 4 was marked for 12 identification.) 13 MR. McDONOUGH: So if you scroll down so 14 the footer on the first page can be visible. 15 Yes. 16 BY MR. McDONOUGH: 17 Q. Do you recognize this as Exhibit 24 -- 18 2044 attached to your declaration? 19 A. (In English) Yes. 20 Q. So this is the English translation of that 21 certification? 22 A. Yes, correct. This is dated 22 November	40 1 A. Correct. 2 Q. If you look at paragraph 9 of your 3 declaration, do you see where it says: 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 Do you see that? 9 A. Yes. 10 Q. Okay. And you don't indicate in the 11 declaration what the revenues or profits were or 12 financials were for 2019 or 2020. Correct? 13 A. No. 14 Q. Then you also note that Exhibit 2046 are 15 preliminary financial statements from 2021 and 16 2022, and that certified English translations are 17 attached as Exhibit 2047. Is that right? 18 A. It is attached and I assume that the 19 exhibit number is correct. 20 Q. And then you go on to say that: 21 [REDACTED] 22 [REDACTED]

41 1 [REDACTED] 2 Did I read that correctly? 3 (The question was interpreted.) 4 THE INTERPRETER: I'm sorry, this was just 5 between the witness and me because I had another 6 slip of the tongue mispronouncing "Duesenfeld" and 7 I apologized for that in German, just so you know. 8 And it was read correctly. 9 MR. McDONOUGH: Understood, thank you. 10 If we could put up Exhibit 5. 11 (Exhibit Grote No. 5 was marked for 12 identification.) 13 MR. McDONOUGH: If you could just scroll 14 down so the footer is visible. 15 BY MR. McDONOUGH: 16 Q. Do you recognize this as Exhibit 2047 to 17 your declaration? 18 A. (In English) Yes, is the year 2022, or 19 what? Or '21? 20 Q. I think if we scroll out we can see the 21 headers. 22 A. (In English) Ah, '21.	43 1 [REDACTED] 2 [REDACTED] 3 A. Yes. 4 Q. Okay. If we could go to the second page 5 of this exhibit. And if we look at the 6 description in the row near the bottom that says 7 "Result before taxes". [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 A. Correct. 11 [REDACTED] 12 [REDACTED] 13 your declaration. Correct? 14 A. It's the preliminary result. 15 Q. But it's the same value is my question. 16 A. Exactly. We have a tax consultant and 17 they take care of all the data in the office. 18 MR. McDONOUGH: Can we put up Exhibit 6. 19 (Exhibit Grote No. 6 was marked for 20 identification.) 21 BY MR. McDONOUGH: 22 Q. Do you recognize Exhibit 6 as Exhibit 2046
42 1 Q. And so just to confirm, this is showing 2 the financials for 2021? 3 A. Yes, that is correct. 4 Q. Okay. So if we look at the left-most 5 column under the description, there's a line near 6 the bottom that says, "Profit before taxes". If 7 you look along the right side -- if you look along 8 the right-most column in that -- in that row, it's 9 correct that that's the reported profit before 10 taxes for the period January through December 11 2021. Correct? 12 A. Yes. The figure on the right at the 13 bottom in the last line is the reported profit, 14 the preliminary reported profit, sorry. 15 [REDACTED] 16 [REDACTED] 17 A. That is correct, yes. 18 Q. And that's the value that you noted in 19 paragraph 9 of your declaration as profit for 20 2021. Is that right? 21 A. Correct. 22 Q. Okay. So this exhibit is confirming that	44 1 to your declaration? 2 A. Yes, that is 2021. 3 Q. And this is the German language version of 4 the same table we just saw. Correct? 5 A. Correct. 6 Q. And if we look down at the same row we 7 were looking at previously, the description there 8 is "Ergebnis vor Steuern". Correct? 9 A. Where exactly are you at in description? 10 Q. The third row from the bottom. 11 A. Correct. That's what it says here. 12 Q. So that's the row that is referring to the 13 profits before taxes. Correct? 14 A. Yes. That's what it looks like. 15 Q. And if we go to the second page of that 16 exhibit. And once again third row from the 17 bottom. And that row is "Ergebnis vor Steuern" 18 and that's reporting the profits before taxes for 19 the periods of 2022. Correct? 20 A. Correct. 21 Q. Okay. Thank you. 22 MR. McDONOUGH: Can we put up Exhibit 7.

Transcript of Lydia Grote
Conducted on April 18, 2025

12 (45 to 48)

45 1 (Exhibit Grote No. 7 was marked for 2 identification.) 3 BY MR. McDONOUGH: 4 Q. This is a document produced by Duesenfeld 5 bearing the Bates number DUESENFELD_IPR00000207. 6 Ms. Grote, do you recognize this document? 7 A. Yes. 8 Q. What is this document? 9 A. This is what is called an economic 10 analysis or a business analysis for the year 2023 11 not including any legal and consultancy expenses. 12 MR. CARLSON: I want to -- I want to 13 object. We produced this with a -- with a footer 14 saying "Confidential pursuant to PTAB protective 15 order" and I don't see -- 16 MR. McDONOUGH: I think if you scroll down 17 it is on there, I think it's just getting to the 18 bottom. 19 MR. CARLSON: Is it there? Okay. 20 MR. McDONOUGH: Yeah. 21 MR. CARLSON: Okay, thank you. 22 MR. McDONOUGH: Yeah.	47 1 BY MR. McDONOUGH: 2 Q. This is a document produced by Duesenfeld 3 bearing the Bates number DUESENFELD_IPR00000208. 4 Do you recognize this document? 5 A. Yes. 6 Q. And what is this document? 7 A. It is a business analysis for the year 8 2024. It's an annual overview, again without 9 legal and consultancy expenses. 10 Q. Understood. And if we look at the third 11 row from the bottom that says, "Ergebnis vor 12 Steuern" and the right-most value -- the 13 right-most column, that's reporting the value 14 for January through December 2024? 15 A. Yes. 16 [REDACTED] 17 A. That is correct. 18 Q. So, is it accurate to say that, according 19 to this document, [REDACTED] 20 [REDACTED] 21 A. That is correct. 22 Q. Okay. So, I don't think we had any
46 1 MR. CARLSON: Thank you. 2 BY MR. McDONOUGH: 3 Q. If we look at the row under the 4 second-to-left column near the bottom -- the third 5 from the bottom again it says "Ergebnis vor 6 Steuern". Correct? 7 A. Correct. 8 Q. And then if we go to the right-most 9 column, that's the value reported for January 10 through December 2023. Correct? 11 A. That is correct. 12 [REDACTED] 13 Correct? 14 A. Correct. 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 A. That is correct. 20 MR. McDONOUGH: Can we put up Exhibit 8. 21 (Exhibit Grote No. 8 was marked for 22 identification.)	48 1 production of information for the year 2020 and 2 I know you don't mention that in your declaration, 3 but for the four years that we have looked at -- 4 2021 to '24 -- [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 A. That is correct. 10 MR. McDONOUGH: Okay. Could we go back to 11 Exhibit 1. 12 BY MR. McDONOUGH: 13 [REDACTED] 14 [REDACTED] 15 A. Yes. 16 Q. And that reads: 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED]

49

1 [REDACTED]
2 Did I read that correctly?
3 **A. Yes. Yes, you read that correctly.**
4 Q. And Duesenfeld's processing of lithium
5 batteries, does that include that deep discharge
6 step that we discussed earlier?
7 **A. Sometimes yes, but it is also possible**
8 **that this is not included. The batteries arrive**
9 **at our plant as batteries and the customers tell**
10 **us to recycle them. Some of the batteries that**
11 **arrive are already deep discharged, some are not,**
12 **so we do not differentiate there.**
13 Q. When you say you don't differentiate, what
14 do you mean by that?
15 **A. Are you referring to the period of 2021 or**
16 **is this about the present days? Because there**
17 **have been developments. So what exactly are you**
18 **referring to?**
19 Q. Well, I -- you had -- you had said that:
20 "Some of the batteries that arrive are
21 already deep discharged, some are not, so we do
22 not differentiate there."

50

1 And I was just trying to understand what
2 you meant by "we don't differentiate".
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

51

1 [REDACTED]
2 [REDACTED]
3 Q. Okay.
4 **A. At the time.**
5 Q. And then, if I understood correctly, if
6 a battery came in and needed to be discharged, it
7 would be. And if it was already discharged then
8 it didn't need to be. Is that accurate?
9 MR. CARLSON: Objection; compound.
10 BY MR. McDONOUGH:
11 Q. It was a bad question.
12 **A. Could you just break down --**
13 Q. Yeah.
14 **A. -- that? Could you just break down the**
15 **question?**
16 Q. I think I can ask it more simply. Because
17 you had said that sometimes batteries were
18 discharged and sometimes they weren't. And I just
19 wanted -- I'm asking if a battery arrived and it
20 needed to be discharged, Duesenfeld would
21 undertake the discharging. Is that correct?
22 [REDACTED]

52

1 [REDACTED]
2 [REDACTED]
3 [REDACTED] **nd, yes, before we recycle the**
4 **batteries we discharge them.**
5 Q. Got it. Understood. Thank you.
6 Just so I understand, the recycling -- the
7 payment for the recycling in exchange for the
8 recycling certificate, is that different from the
9 sale of black mass?
10 MR. CARLSON: Objection; vague.
11 THE WITNESS: Could you be more specific
12 in wording the question, or clearer?
13 BY MR. McDONOUGH:
14 Q. I can try.
15 Is the payment that Duesenfeld would
16 receive in exchange for the recycling certificate
17 for the battery a separate transaction from the
18 subsequent sale of black mass to the customer?
19 **A. The wording of the question is not really**
20 **very clear.**
21 [REDACTED]
22 [REDACTED]

53 1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 Q. In the 2021/2022 timeframe, do you have 13 any understanding of what the proportion of those 14 sources of revenue was? 15 MR. CARLSON: Could you -- could you 16 repeat the question, please? 17 BY MR. McDONOUGH: 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED]	55 1 the field of lithium-ion battery recycling? 2 A. I think I mentioned that we're an active 3 participant in the market. But I'm looking for 4 the actual location of that, maybe you can help me 5 there. 6 Q. Well, I'm not -- I don't know that I've 7 seen one, I'm just asking if you -- if you can 8 point me to any place in your declaration where 9 you identify Duesenfeld's market share in the 10 field of lithium battery recycling. 11 A. I found it. It's actually in paragraph 2. 12 And there it says something along the lines that 13 Duesenfeld is an active market participant in the 14 field of recycling of electric vehicle batteries. 15 THE INTERPRETER: Let me just add, as an 16 interpreter, I do not have that in front of me, so 17 my translation into English might differ from the 18 original English text. 19 BY MR. McDONOUGH: 20 Q. Well if we go to paragraph 2 of Exhibit 1. 21 The first sentence there is: 22 "Duesenfeld is an active participant in
54 1 [REDACTED] 2 Q. Who would you have to ask? 3 A. I'd have to ask the tax consultant. 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 Q. Would you be able to estimate the fraction 10 of revenue that you get from those other sources 11 in the years 2021/2022? 12 A. No, I would not be able to give you that. 13 I would have to ask the tax consultant. 14 Q. In your declaration you don't mention 15 Duesenfeld's market share in the field of lithium 16 battery recycling. Correct? 17 A. Where does it say that I'm not doing that? 18 Or where should that be mentioned? I don't really 19 know where to put that in terms of context. 20 Q. Well, I can just ask. Do you -- do you 21 have an understanding -- in your declaration is 22 there a discussion of Duesenfeld's market share in	56 1 the market for the recycling of batteries from 2 electric vehicle ('EVs')." 3 Is that the discussion of the market share 4 that you're referring to? 5 A. Correct. 6 Q. That doesn't provide a quantification of -- 7 a quantification of a percentage or dollar value 8 or euro value in the market for recycling 9 batteries from electric vehicles. Is that right? 10 A. That is right. 11 Q. It just says "market". Right? It doesn't 12 specify if there's a geographic limit. 13 A. Correct. 14 Q. If we could go to paragraph 10 -- 15 actually, we've been going for a little bit, just 16 over an hour. Is now a good time for a break? 17 MR. CARLSON: Fine by me. 18 MR. McDONOUGH: Okay. Why don't we do 19 that. 20 THE INTERPRETER: Excuse me, counsel, how 21 long is the break going to be? 22 MR. McDONOUGH: About five, ten minutes,

57

1 maybe.
2 THE VIDEOGRAPHER: Let me just go off the
3 record.
4 We are going off the record. The time is
5 1.11.
6 (Brief recess taken 1:11 p.m. - 1:22 p.m.)
7 THE VIDEOGRAPHER: We are back on the
8 record. The time is 1.22.
9 MR. McDONOUGH: Can you put Exhibit 1, if
10 we could go to paragraph 10.
11 BY MR. McDONOUGH:
12 Q. And it starts on the very bottom and goes
13 over to the next page, looking at the sentence
14 where it says:
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 Do you see that?
20 A. Yes.
21 Q. What do you mean when you say "the related
22 Italian companies"?

58

1 (The question was interpreted.)
2 THE INTERPRETER: Well, the German version
3 of it would be verbundene and the witness answered
4 "That is correct", so related in the sense of
5 related parties.
6 BY MR. McDONOUGH:
7 Q. Are they business affiliates?
8 MR. CARLSON: Objection; lack of
9 foundation.
10 THE WITNESS: All I can say is we signed
11 the license agreement and this is also available
12 to you.
13 BY MR. McDONOUGH:
14 Q. Right, I just want to make sure
15 I understand what the term "related" means in that
16 context.
17 MR. CARLSON: Is there a question pending?
18 BY MR. McDONOUGH:
19 Q. Yes, I'd like to know what the word
20 "related" means in that context.
21 [REDACTED]
22 [REDACTED]

59

1 [REDACTED]
2 Q. Okay.
3 MR. McDONOUGH: Can we go ahead and put up
4 -- I think the file name is "Exhibit 10" but this
5 should actually be Exhibit 9. So put up what is
6 marked as exhibit -- the file name that starts
7 with "Exhibit 10".
8 (Exhibit Grote No. 9 was marked for
9 identification.)
10 BY MR. McDONOUGH:
11 Q. Do you recognize this as Exhibit 2049 to
12 your declaration?
13 [REDACTED]
14 [REDACTED]
15 Q. Can -- if you -- looking at the first
16 page, there's a preamble, there are three numbered
17 paragraphs, the third paragraph begins with, "The
18 Licensee has". Do you see that?
19 A. Yes.
20 Q. And that sentence reads:
21 [REDACTED]
22 [REDACTED]

60

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 Did I read that correctly?
11 A. Yes, correct.
12 [REDACTED]
13 [REDACTED]
14 A. Of course, this is one of our cooperation
15 partners.
16 Q. And can you elaborate what that
17 cooperation partnership means?
18 A. We communicate to our cooperation partners
19 our know-how about how to best build recycling
20 plants according to the Duesenfeld process.
21 [REDACTED]
22 [REDACTED]

61 1 MR. CARLSON: Objection; lack of 2 foundation. 3 BY MR. McDONOUGH: 4 Q. Are you able to answer? 5 [REDACTED] 6 Q. If we look further on page 1, there's 7 a subsection 1.1 under "Subject matter of the 8 Agreement". Do you see that? 9 A. I can see it, yes. 10 Q. And in that section it says: 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 Do you see that? 15 A. Yes. 16 Q. So if we go to page 14 of this document. 17 So this is Annex 1. Correct? 18 A. Yes. 19 Q. And there are three lines here under 20 [REDACTED] 21 [REDACTED] 22 [REDACTED]	63 1 BY MR. McDONOUGH: 2 Q. You can answer. 3 [REDACTED] 4 is possible, or I'm fairly sure that it has 5 something to do with that because the patents are 6 valid for the country. 7 Q. You'd agree there's no United States 8 patents listed here. Correct? 9 MR. CARLSON: Objection; calls for legal 10 conclusion. 11 You can answer to the best of your 12 ability. 13 THE WITNESS: Well, I know that when we 14 apply for vacuum drying in Europe it's different 15 than in the US, but the content is similar, so 16 I really don't know how to answer that question. 17 I'm sorry, I'm not a patent attorney. 18 BY MR. McDONOUGH: 19 Q. That's okay. My question is a little more 20 -- even more simple than it might seem. I'm just 21 trying to confirm, there's no United States patent 22 numbers listed on this page. Correct?
62 1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 A. I can see that, yes. 5 Q. Do you have an understanding of what the 6 -- what is being indicated by the letters "EP," 7 followed by those numbers? 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 Q. Understood. So, it's the -- each of the 12 "EP" followed by a number is a reference to 13 a European patent document, be it an application 14 or an issued patent. Right? 15 A. I can't really say for sure. I -- it can 16 be and I can ask for this to be checked. 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 MR. CARLSON: Objection; calls for a legal 21 conclusion. 22 ///	64 1 A. I don't think so. I believe that 2 everything that starts with "EP" refers to Europe. 3 But I can also check that. I can just -- if you 4 give me a second, I can check that. 5 Q. If you need to take a second, sure, you 6 can confirm that. 7 A. Well, I'm not really a specialist when it 8 comes to looking up numbers, but US patents all 9 start with the letters "US". So it is my 10 understanding that this list does not include any 11 US patents. 12 Q. Okay, thank you. And just to confirm, in 13 paragraph 10 of your declaration you indicated 14 that this license agreement was executed -- signed 15 [REDACTED] 16 A. Correct. 17 Q. Okay. 18 MR. McDONOUGH: If we could put up exhibit 19 -- what will be Exhibit 10 and the file name 20 starts with "Exhibit 11". Sorry for the unhelpful 21 numbering. 22 (Exhibit Grote No. 10 was marked for

65 1 identification.) 2 MR. McDONOUGH: And if we could scroll 3 down so the footer is visible. 4 BY MR. McDONOUGH: 5 Q. Do you recognize this as Exhibit 2050 to 6 your declaration? 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 MR. CARLSON: Objection; lack of 15 foundation. 16 THE WITNESS: [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 ///	67 1 Correct? 2 A. Correct. 3 Q. And as we saw before, there's no United 4 States patent numbers listed here. Correct? 5 A. Yes. These should be the same numbers as 6 in the previous contract we saw earlier. 7 Q. And according to paragraph 10 of your 8 [REDACTED] 9 [REDACTED] 10 A. Correct. 11 Q. Thank you. If we go back to Exhibit 1, 12 paragraph 10. If we you scroll down a little bit. 13 The last sentence there is: 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 Do you see that? 20 A. Yes. 21 MR. McDONOUGH: Can we put up exhibit -- 22 what will be Exhibit 11 and the file name is
66 1 BY MR. McDONOUGH: 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 Q. Now, if we scroll down again to -- on the 10 same page, to section -- subsection 1.1 where it 11 says: 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 Do you see that? 16 A. Yes. 17 Q. So if we go to page 14 of this exhibit. 18 This is Annex 1. Correct? 19 A. Correct. 20 [REDACTED] 21 [REDACTED] 22 [REDACTED]	68 1 "Exhibit 12". 2 (Exhibit Grote No. 11 was marked for 3 identification.) 4 BY MR. McDONOUGH: 5 Q. This is a document that's been produced by 6 Duesenfeld in this matter bearing Bates number 7 DUESENFELD_IPR00000131. 8 Do you recognize this document? 9 [REDACTED] 10 [REDACTED] 11 Q. That's the license that you mention in 12 your declaration at paragraph 10? 13 A. Correct. 14 Q. Okay. If we could go to the second page 15 of this document. And scroll down just a little 16 bit. There. 17 Under subsection 1.1 -- there are two 18 columns, the German on the left and English on the 19 right, I'm going to have to read the English -- 20 that says: 21 [REDACTED] 22 [REDACTED]

69

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 Do you see that?
5 **A. Yes.**
6 MR. McDONOUGH: And could we put up
7 Exhibit 12, file name "Exhibit 13".
8 (Exhibit Grote No. 13 was marked for
9 identification.)
10 BY MR. McDONOUGH:
11 Q. This is a document produced by Duesenfeld
12 in this matter bearing Bates number
13 DUESENFELD_IPR00000154. Do you see that?
14 **A. Yes.**
15 Q. And do you know -- do you recognize this
16 document?
17 **A. Well, I haven't seen it for quite some**
18 **time, but it says "Appendix 1" and I assume that**
19 **this is about the property rights.**
20 Q. Is it fair to say this is the Annex 1 to
21 [REDACTED]
22 MR. CARLSON: Objection; lack of

70

1 foundation.
2 THE WITNESS: So the question is are these
3 patents in the contract, in the agreement as
4 Appendix 1?
5 BY MR. McDONOUGH:
6 Q. Yeah. The issue is that this document --
7 the license document and this annex were produced
8 to us separately, but there were contiguous
9 numbers -- contiguous production numbers and I'm
10 just trying to make sure I confirm that this is in
11 [REDACTED]
12 **A. I'm sorry, I cannot check that myself.**
13 **But I assume if we produced it that way it is the**
14 **annex to the agreement.**
15 **Has this been signed? Could you maybe**
16 **scroll down to see if it's been signed.**
17 **Normally this should be signed. This is**
18 **what I see now.**
19 Q. So here we have -- this is -- this is the
20 page that has been produced consecutively to the
21 [REDACTED]
22 agreement document which itself didn't include an

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1 Annex 1. This is the first page after that. And
2 there are subsequent appendices that follow. Any
3 [REDACTED]
4 [REDACTED]
5 **A. No.**
6 Q. Okay.
7 MR. McDONOUGH: And I think, Steve, we'd
8 just make the request that the complete agreement,
9 including all the annexes, just be produced as
10 a single document as opposed to a disjointed one
11 so we could just --
12 MR. CARLSON: Okay. We'll take that under
13 advisement.
14 MR. McDONOUGH: All right. Thank you.
15 BY MR. McDONOUGH:
16 Q. So looking at this page there's one
17 [REDACTED]
18 [REDACTED]
19 **A. Correct.**
20 Q. Then we see underneath those subheadings
21 a series of numbers that start with "EP" and seem
22 to reflect or refer to European patents or patent

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1 applications that are either pending or granted.
2 Is that correct?
3 **A. Yes. I would say that's right. And, as**
4 **I said earlier, I asked the patent attorney**
5 **exclusively to compile such lists.**
6 Q. And there's no United States patent
7 numbers listed on this page. Correct?
8 **A. Well there is nothing on it that starts**
9 **with "US".**
10 Q. So you'd agree there's no reason to think
11 these are any -- listing of any US patent numbers.
12 Correct?
13 MR. CARLSON: Objection; calls for a legal
14 conclusion.
15 THE WITNESS: Well, it's basically
16 impossible for me to say or hard to say what these
17 numbers refer to. All I know is that "EP" refers
18 to Europe and "US" refers to the United States.
19 But I can't really say anything about the numbers
20 per se.
21 BY MR. McDONOUGH:
22 Q. And we don't see the letters "US" in that

73 1 way on this page. Correct? 2 A. Yes. In front of each of these numbers 3 there is "EP" and not "US". 4 Q. And the word "United States" doesn't 5 appear anywhere on the page. Correct? 6 A. Correct. 7 MR. McDONOUGH: Now, if we could put up 8 Exhibit 13 which is file name "Exhibit 14". 9 (Exhibit Grote No. 13 was marked for 10 identification.) 11 BY MR. McDONOUGH: 12 Q. This is a document produced by Duesenfeld 13 in this matter bearing Bates number 14 DUESENFELD_IPR00000001. 15 Do you recognize this document? 16 A. That's the document you showed at the very 17 beginning. Is that right? 18 Q. Do you recognize this as a declaration you 19 submitted in the District Court litigation between 20 Duesenfeld and Ascend Elements? 21 A. I actually issued two declarations and 22 I'd like to know which one this is.	75 1 foregoing is true and correct." 2 Dated December -- well, December 17, 2024. 3 Do you see that? 4 A. Yes. 5 Q. And then there's a signature block that -- 6 just to the right of that. Is that your 7 signature? 8 A. Yes. 9 Q. Okay. All right. 10 MR McDONOUGH: We've been going for 11 a little under an hour, but why don't we take 12 another break for another ten minutes? 13 MR. CARLSON: Okay. That's fine. 14 MR. McDONOUGH: Okay. 15 THE VIDEOGRAPHER: We are going off the 16 record. The time is 2:04 p.m.) 17 (Brief recess taken 2:04 p.m. - 2:12 a.m.) 18 THE VIDEOGRAPHER: We are back on the 19 record. The time is 2:12. 20 BY MR. McDONOUGH: 21 Q. Welcome back, Ms. Grote. Is it Grote or 22 Grote?
74 1 Q. Well, the title of this one is 2 "Declaration of Lydia Grote in support of 3 Duesenfeld's Answering Brief to Ascend's Motion to 4 Stay". And that's filed in the United States 5 District Court for the District of Delaware. 6 Does that refresh your recollection about 7 this? 8 A. So that's not the declaration that this 9 hearing today is about, but the other declaration. 10 Q. Understood. But this is the declaration 11 that you submitted in the District Court case. 12 Correct? 13 A. Exactly, yes. If this is the other one, 14 that's what it is. 15 Q. Okay. And if we could turn to page 9 of 16 this document. 17 And if you look here there's a signature 18 block. Do you see that? 19 A. Yes. 20 Q. And above that it says: 21 "I declare under penalty of perjury under 22 the laws of the United States of America that the	76 1 A. Grote. 2 Q. Grote. Okay, yeah, I knew I was going to 3 -- I'm sorry. 4 Earlier, we were talking about some of the 5 documents that you brought with you which you had 6 some annotations. Were those documents that you 7 relied on in preparing for today's deposition? 8 A. Some of them, yes. I couldn't prepare to 9 the extent that I would have liked to prepare. 10 Q. Did you consult any of those annotations 11 or doc -- on documents during your testimony 12 today? 13 A. I actually printed out the German 14 translation of my declaration, the declaration 15 which this hearing is about. And I also read it 16 today and also earlier -- on an earlier occasion. 17 I also have some of the annexes. And I did not 18 read the license agreements in their entirety, 19 I did not read them in detail. 20 Q. But the documents on which you have marked 21 or annotated notes, were you consulting those 22 during your testimony today?

Transcript of Lydia Grote
Conducted on April 18, 2025

20 (77 to 80)

77 1 MR. CARLSON: Wait. What's the relevancy 2 of this? 3 BY MR. McDONOUGH: 4 Q. You can answer. 5 MR. CARLSON: Well, I object, I object. 6 It's not relevant to this. 7 MR. McDONOUGH: You've lodged your 8 objection. 9 BY MR. McDONOUGH: 10 Q. But you can answer. 11 MR. CARLSON: What's the question? 12 MR. McDONOUGH: Can I have the question 13 read back? Well, I can say it. 14 BY MR. McDONOUGH: 15 Q. The documents that you have marked or 16 annotated notes, have you consulted those during 17 your testimony today? That's the question. 18 MR. CARLSON: You can answer that yes or 19 no. 20 THE WITNESS: Yes. 21 MR. McDONOUGH: Okay. So we're going to 22 reserve the right to have those produced to us.	79 1 ACKNOWLEDGMENT OF DEPONENT 2 I, LYDIA GROTE, do hereby acknowledge that 3 I have read and examined the foregoing testimony, 4 and the same is a true, correct and complete 5 transcription of the testimony given by me and any 6 corrections appear on the attached Errata sheet 7 signed by me. 8 9 10 11 12 Signature Date 13 14 15 16 17 18 19 20 21 22
78 1 MR. CARLSON: It's work product, it's -- 2 you're -- no. Well, you can -- you can make your 3 request. We'll evaluate it. 4 MR. McDONOUGH: We'll put it in a letter. 5 MR. CARLSON: You may do that. 6 MR. McDONOUGH: Okay. Well, with that, 7 I don't have any more questions. Thank you for 8 your -- thank you for your time. 9 MR. CARLSON: We started at five in the 10 morning for that. Okay, thank you. I've no 11 questions either. 12 THE WITNESS: Thank you very much for your 13 time, thank you for the interpretation, and I wish 14 you a good day. 15 MR. McDONOUGH: Thank you very much. 16 THE VIDEOGRAPHER: This concludes the 17 deposition. We are going off the record. The 18 time is 2:17. 19 (The deposition concluded at 2:17 p.m.) 20 21 22	80 1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC 2 3 I, AUDREY SHIRLEY, Qualified Realtime 4 Reporter, Accredited Court Reporter and Fellow of 5 the British Institute of Verbatim Reporters do 6 hereby certify: 7 8 That LYDIA GROTE, the witness whose 9 deposition is hereinbefore set forth, was duly 10 sworn by me before the commencement of such 11 deposition and that such deposition was taken 12 before me and is a true record of the testimony 13 given by such witness. 14 15 I further certify that the adverse party, 16 ASCEND ELEMENTS, INC., was represented by counsel 17 at the deposition. 18 19 I further certify that the deposition of 20 LYDIA GROTE, occurred VIRTUALLY on FRIDAY, 21 APRIL 25, 2025, commencing at 11:03 A.M. to 22 2:17 P.M.

Transcript of Lydia Grote
Conducted on April 18, 2025

21 (81 to 84)

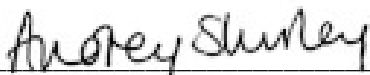
81

1 I further certify that I am not related to
2 any of the parties to this action by blood or
3 marriage, I am not employed by or an attorney to
4 any of the parties to this action, and that I am
5 in no way interested, financially or otherwise,
6 in the outcome of this matter.

7

8 IN WITNESS WHEREOF, I have hereunto set my
9 hand this 18th day of April 2025.

10

11 
12 _____

13 Audrey Shirley, QRR, ACR, FBIVR

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21

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A			
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