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

SAMSUNG DISPLAY CO., LTD.,	)	
	)	
PETITIONER,	)	
	)	
VS.	)	Case No.
	)	IPR2024-01094
PICTIVA DISPLAYS INTERNATIONAL, LTD.,	)	Patent No.
	)	6,949,389
PATENT OWNER.	)	

CORRECTED TRANSCRIPT
REMOTE DEPOSITION OF EXPERT WITNESS
JUNE ANN MUNFORD
WEDNESDAY, SEPTEMBER 3, 2025

JOB NO. 7557883
REPORTED BY: D'ANNE MOUNGEY, CSR 7872

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DEPOSITION OF JUNE ANN MUNFORD, TAKEN ON BEHALF OF THE PATENT OWNER AT PITTSBURGH, PENNSYLVANIA, COMMENCING AT 9:03 A.M. ON WEDNESDAY, SEPTEMBER 3, 2025, BEFORE D'ANNE MOUNGEY, CSR 7872.

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I N D E X

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	BY MR. WARRICK	4

E X H I B I T S

NO.	PAGE	DESCRIPTION
EXHIBIT 1	54	SCIENCEDIRECT - SYNTHETIC METALS ARTICLES IN PRESS
EXHIBIT 1007	5	ORGANIC LIGHT-EMITTING DIODES BASED ON NEW N-DOPED ELECTRON TRANSPORT LAYER
EXHIBIT 1037	7	DECLARATION OF JUNE ANN MUNFORD

QUESTIONS INSTRUCTED NOT TO ANSWER

(NONE)

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PITTSBURGH, PENNSYLVANIA

WEDNESDAY, SEPTEMBER 3, 2025; 9:03 A.M.

THE REPORTER: We are on the record. My name is D'Anne Moungey. I'm a Certified Shorthand Reporter. My CSR number is 7872.

I will now swear in the witness.

JUNE ANN MUNFORD,

having been first duly sworn by the reporter, was examined and testified as follows:

EXAMINATION

BY MR. WARRICK:

Q Good morning, Ms. Munford.

A Good morning, Mr. Warrick.

Q Have you been deposed before?

A I have.

Q Approximately how many times?

A This will be my 16th.

Q Okay. So I can assume you're familiar with the process. But just a couple of reminders, if I may.

As I ask questions and for any reason you don't understand the question, please ask me for

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clarification. Otherwise, I'll assume you understand the question; is that fair?

A That's fair.

Q If at any point you need a break, please let me know, and we will try to accommodate. The only thing I ask is that if there is a question pending that you answer the question before we take the break.

That sounds --

A Makes sense to me.

Sorry. Didn't mean to step on you.

Yeah, it makes sense to me.

Q And, Ms. Munford, is there any reason you cannot give full, accurate and truthful testimony today?

A No.

MR. WARRICK: I would like to introduce an exhibit.

If I did this correctly, it should be -- it should show up now as Exhibit 1007.

(Whereupon, Patent Owner Exhibit 1007 was marked for identification by the Court Reporter.)

THE WITNESS: Yes, I can see that on my end.

BY MR. WARRICK:

Q Okay. And are you able to open Exhibit 1007?

A Yep. It's in front of me right now.

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Q All right. Do you recognize this document?
A I do.
Q And this is an article entitled "Organic Light-emitting diodes based on new n-doped electron transport layer" by J.W. Ma and other authors; correct?
A That's correct.
Q When did you first see this article?
A I believe it would have been soon after being contacted in November 2024.
Q And when you say "contacted," who contacted you?
A The law firm of Covington.
Q And that was in connection with this matter of Samsung Display Company versus Pictiva Displays International; is that correct?
A That's my understanding.
Q And in November of 2024 when you were first contacted, were you asked to draft a declaration in connection with this case?
A I don't recall if I was explicitly asked to write a declaration in November. We may have had some scheduling to figure out or some time to do some background research before we formalized the decision to make a declaration. But work included in this deposition was begun in November.

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MR. WARRICK: I would like to introduce another exhibit. It should be available to you. Exhibit 1037.

(Whereupon, Patent Owner Exhibit 1037 was marked for identification by the Court Reporter.)

THE WITNESS: I'm looking at it.

BY MR. WARRICK:

Q Okay. And do you recognize Exhibit 1037?

A I do.

Q And Exhibit 1037 is the declaration that you signed and was admitted in connection with this case; correct?

A Give me a quick second to review.

(Document reviewed by the witness.)

THE WITNESS: Correct.

BY MR. WARRICK:

Q So it's very clear on the record, when I'm referring to this case or this matter, I'm referring to Samsung Display Co., LTD versus Pictiva Displays International, Case Number ITR-202401094.

Now, Ms. Munford, if you turn to what's Page 24 of your declaration. And I guess, to be clear, it's a little bit confusing potentially because there are numbers of -- page numbers and appendix numbers.

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But I'm going to refer to the exhibit numbers in the lower right corner. So that's also the page number of the PDF document.

So if you could go to Page 24 of Exhibit 1037.

A Just to confirm, that's the page with my signature on it?

Q Correct.

A Then I am looking at that.

Q Is it correct that you signed this declaration on August 11th of 2025?

A I believe so.

Q And how much time did you spend preparing this declaration?

A I'd estimate somewhere between six and seven hours.

Q Is there a reason it took from November of 2024 to August of 2025 to prepare the declaration?

A I was following the schedule preferred by my clients. I don't recall any issues that would have delayed the creation of the declaration.

Q Do you recall if the declaration was complete prior to August 11th, 2025?

A I do not recall. Although, it is possible.

Q Is it possible that the declaration was

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complete more than a month before you signed it on August 11th, 2025?

MR. GARR: Objection.

THE WITNESS: I don't recall.

BY MR. WARRICK:

Q Who drafted the declaration, Exhibit 1037?

A I drafted the declaration with assistance from counsel.

Q And when you refer to counsel, are you referring to attorneys at Covington?

A I am.

Q Did anyone else assist you in the preparation of the declaration?

A Only attorneys from Covington.

Q Did you contact anyone, other than attorneys at Covington, in the course of preparing this declaration?

A I believe I may have contacted some libraries for materials that were not ultimately included within the declaration.

Q Do you recall which libraries you reached out to?

A Not exactly. I recall at least the Linda Hall Library, but I believe there were others.

Q And you testified that there were some

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materials from those other libraries that were ultimately not included in your declaration.

Why is that?

A I don't recall.

Q Ms. Munford, have you read the entirety of your declaration, Exhibit 1037?

A Yes.

Q Now, I'd also like to ask about your preparation, if any, getting ready for today's deposition.

Did you do anything to prepare for this deposition?

A I did.

Q And what did you do?

A I reviewed the declaration with counsel, as well as reviewing the declaration on my own.

Q And when you say "counsel," are you now referring to attorneys at the Covington law firm?

A Correct.

Q Did you have discussions with anyone else in connection with preparing for the deposition?

A No.

Q Did you review any other documents to prepare for the deposition?

A Only my e-mail chain related to this case so

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I could determine the timeline of when I started working on it.

Q And approximately how much time did you spend preparing for today's deposition?

A I spent approximately 90 minutes with counsel and approximately 90 minutes on my own.

Q And going back to the preparation of your declaration itself, Exhibit 1037, you have attached various documents as appendices. And you reference some materials from other libraries that were not included.

Were there any other documents that you reviewed in the course of preparing that declaration?

A As in documents considered but not ultimately included in the dec?

Q Any documents that you reviewed as you were preparing the declaration.

A I would say that I reviewed several Internet Archive captures that were not ultimately included within the declaration.

Q Do you recall what archive captures were not included?

A They would be various captures of the ScienceDirect website similar to the captures in the current declaration that were excluded because they were either outside of the date range that were being

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discussed or were navigation pages that weren't ultimately relevant to the case.

Q In preparing your declaration, did you review any documents from this case?

A The only --

THE WITNESS: I apologize. Go ahead.

MR. GARR: I was just going to say, "objection."

THE WITNESS: The only documents that I reviewed related to this case would be the Garland declaration.

BY MR. WARRICK:

Q Okay. You didn't review any other documents from this case?

A Not that I recall.

Q Going back to Exhibit 1037. If we turn to Appendix CV, which starts at Page 25 of the PDF.

A I'm there.

Q And from pages 25 through 39, this is your CV; correct?

A Correct.

Q If you could turn, please, to Page 27.

A Got it.

Q And according to Page 27, you were employed as a library assistant at the Hart Area Public Library

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from September 2006 through October 2013; is that correct?

A That's correct.

Q And there were some responsibilities listed under that entry in your CV.

And are those accurate descriptions of your responsibilities in that role?

A Those are accurate descriptions of some of my responsibilities in that role.

Q Did you have any responsibility in 2008 or earlier for -- well, strike that.

Did you have any responsibility in 2008 or earlier for online sources?

A I would say that many of my responsibilities would be related to or involved interacting with online sources. Uh-huh.

Q Have any of your experiences -- strike that.

Do you have any experience with indexing online journal articles?

A I have experience indexing online journals via the library cataloguing process. I have not indexed any journal articles specifically.

Q Can you explain what you mean by "indexing online journals via the library cataloguing process"?

A Sure.

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In library cataloguing, journals are catalogued, much as a cataloger would index other materials, such as a hard cover book or a CD-ROM, or a magazine. But when cataloguing journals, only the journal itself is catalogued and not the individual issues or articles consisting of that journal.

Q So to ask perhaps a better question: Do you have any experience indexing online versions of journal articles for online searches?

A Only to the extent that a user of a library catalog would be able to discover the journal in question by searching. I have not indexed journal articles in specific.

Q Do you have any familiarity with how online journal articles are indexed for searching?

A Not via my experience working in libraries as a cataloger. But in my experience performing my current job and my experience in education, for instance, pursuing my library degree, in which I would need to use those online materials and their search engines.

Q But to be clear, you have never been responsible for indexing any online journal articles for Internet searching?

MR. GARR: Objection.

THE WITNESS: I have been responsible for

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indexing only the journals themselves, not the specific articles within them.

BY MR. WARRICK:

Q And when you say responsible for indexing journals, are you referring to online journals or hard copy journals?

A I have experience working with library catalog records of both paper and digital journals.

Q Are you familiar with how online journals were indexed for Internet searching in 2008?

A I am familiar with the way that journals specifically are indexed via the cataloguing process. And familiar with how journal articles are indexed via my experience using the journal platforms, such as ScienceDirect. To search for those materials would require some knowledge of how the materials are indexed.

Q Are you familiar with how long it would typically take an online journal article to be indexed for Internet searching in August of 2008?

A I believe that any knowledge related to indexing in 2008 would be specific to the journal or the platform. So I may be familiar with individual searches that I've made, but not as -- not as familiar with the industry practices as a whole.

Q And you mentioned ScienceDirect.

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Am I correct that that is an online service of Elsevier?

A Yes. That is an online database managed and maintained by Elsevier.

Q When did you first use that database?

A I wouldn't be able to provide you a specific date, but it would have been some time during my undergraduate studies.

Q Looking back at Exhibit 1007. This article is from the Synthetic Metals' journal; is that right?

A That's my understanding.

Q And just for convenience today going forward, if I refer to this as the "Ma article," will you understand that I'm referring to Exhibit 1007?

A Yes.

Q Are you familiar with the Synthetic Metals' journal?

A I am familiar with it via my research performed for this case.

Q Had you heard of the Synthetic Metals' journal prior to working on this case?

A I don't recall.

Q Do you have any knowledge of -- regarding -- or strike that.

Do you have any knowledge regarding the

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timing of the indexing of Synthetic Metals' online journal articles for Internet searching?

A I have no personal experience indexing these materials. But the information that I have gathered in this declaration does represent the -- a selection of knowledge that I understand about this journal.

Q But you have no personal knowledge regarding the timing of indexing Synthetic Metals' journal articles for Internet searching; correct?

MR. GARR: Objection.

THE WITNESS: I have no personal experience, for instance, working for Elsevier or ScienceDirect or Synthetic Metals that would allow me knowledge of their internal indexing processes. But I do have knowledge of how the journal was indexed based on its appearance within the ScienceDirect database.

BY MR. WARRICK:

Q And that knowledge is what you describe in your declaration, Exhibit 1037; correct?

A Correct.

Q If we could go back to your declaration, Exhibit 1037. And specifically go to Paragraph 13, which is on Page 7.

A Got it. I'm there.

Q Well, actually if we could, let's -- still on

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Page 7, start with Paragraph 10. States:

"In my opinion Exhibit 1007 with its present substantive content, was made available as of the date provided on the front of the article, August 29th, 2008 via the Elsevier/ScienceDirect website."

Is that a correct statement of your opinion in this case?

A That is my opinion, yes.

Q Is it also true of Paragraph 11 regarding the ability to search for that article?

A That is correct.

Q Going to Paragraph 13. The last sentence, you say:

"Based on my review of a number of different documents, as well as my own experience and my opinion, Exhibit 1007 was made available to the public on August 29th, 2008."

Did those documents include the Garland declaration you referenced earlier?

A Yes.

Q So you relied in part on the Garland declaration in reaching your conclusion that

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Exhibit 1007 was made available to the public on August 29th, 2008?

A Yes, I believe the Garland declaration supports my opinion.

Q If we could turn to Appendix 1 of your declaration, which begins at Page 40 of the PDF.

A Okay. Got it.

Q What is Appendix 1?

A Appendix 1 is a letter by Barry P. Rand and other authors as published in Organic Electronics.

Q And this is another document you relied upon in reaching your conclusion that Exhibit 1007 was available to the public in August of 2008?

A Yes.

Q This article was published in 2009; correct?

A Correct.

Q And according to the first page of this article, it was purportedly first available online in May of 2009; correct?

A Correct.

Q Why did you choose this particular article for inclusion in your declaration?

A This particular article is also published in an Elsevier-related journal. And in the article info section of this appendix on Page 41 of the declaration,

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there is a section discussing article history. This article history section indicates this letter was revised between initially being received on April 2nd, and accepted on April 21st.

This note that the material has been revised, prior to its availability, is relevant when discussing the Ma article; as the Ma article does not include a note that the paper has been revised. And as such, has not been modified significantly from its initial acceptance through to its publication.

Q Is the absence of such a revision note on the face of the Ma article your basis for your opinion that the same version of the Ma article was available online in August 2008 as was later published in the summer of 2008?

MR. GARR: Objection.

THE WITNESS: Both appendices 1 and 3 contain similar notes about the revision, while the Ma paper does not. And as such, I believe that supports my opinion that the Ma paper was available online in its original form prior to being formally published in paper via the Synthetic Metals' journal.

BY MR. WARRICK:

Q Does your declaration identify any other evidence supporting that conclusion?

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A Which conclusion? The revision?

Q The conclusion that this article -- the Ma article was available in August of 2008 in the identical substantive form to the version that was published in December of 2008.

A The assertion that the Ma article was not revised during this publication process is supported by these two articles. And while there may be more language to discuss that, I don't believe there is additional evidence discussing it.

Q And your declaration does not include, for example, any articles from 2008 or earlier that have similar notes as Appendix 1 regarding revisions; correct?

A The other article included in this work as Appendix 3 was initially made available online in 2008.

Q And turning to that article, Appendix 3, starts at Page 54 of Exhibit 1037.

A I'm there.

Q But according to first page of the article, it was available online November 28th, 2008. And was received in revised form on September 28, 2008.

And first -- well, it says "received September 9th, 2008"; correct?

A Correct.

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Q But your declaration does not include any examples of articles including these types of revision notations from August 2008 or earlier, does it?

A Correct.

Q And going back to the body of your declaration, if we can go to Page 8, and specifically Paragraph 15.

A I'm there.

Q The first sentence says:

"It is further my experience that in cases where Elsevier journal articles that differ in substance from the first online published version, they are accompanied by a notation as to what has changed from the online article."

Did I read that correctly?

A That's correct.

Q Just to clarify, when you refer to your experience, you don't have any personal experience regarding these notations in August 2008 or earlier, do you?

A I may have reviewed articles that contained these revised notes in 2008, but I would not have been paying attention to that note at the time.

Q So is it correct to say that you had no

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personal experience regarding these revision notations in Elsevier journal articles prior to your work on this case?

A I believe I have reviewed other Elsevier materials for my prior cases where I may have noted or discussed the revisions made. But the focus on the revision of the materials, specifically for Synthetic Metals, is something I started for this case.

Q Am I also correct that there is no evidence in your declaration that this revised form notation was used in Synthetic Metals' journal articles in August 2008?

A Correct. The only evidence provided is from November 2008.

Q All right. I'd like to turn to Appendix 2 of your declaration. Starts at Page 46 of Exhibit 1037.

A All right. I'm there.

Q What is Appendix 2?

A Appendix 2 is a capture of an Internet Archive Wayback Machine record for the Elsevier Synthetic Metals articles and press page from December 2nd, 2008.

Q Am I interpreting this document correctly that this particular web page was archived by the Internet Archive Wayback Machine only three times in

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2008?

A After reviewing, I believe that is the case, yes.

Q Do you know what determines how frequently a particular web page is archived by the Wayback Machine?

A That is a question with multiple answers.

Sometimes it is a matter of what the web crawler is prioritizing. Sometimes the request to archive is made by a company or an individual contacting the Internet Archive directly. And sometimes those materials are not archived due to access restrictions.

Q Does the frequency of archiving by the Wayback Machine have any connection to how frequently the site is visited by Internet users?

A I don't have any particular knowledge of the Wayback Machine's crawling software and how influenced it is by web traffic. But I do believe that if a website were inaccessible, that the Internet Archive would still attempt to capture that website.

Q Now, this particular web page, archived web page, in Appendix 2 from December 2nd, 2008 is showing Synthetic Metals' journal articles that were In Press; correct?

A Correct.

Q And what is an Articles in Press?

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A In this context, "Articles in Press" is referring to articles that are available on the Elsevier website; but still in the process of being prepared for publication in the paper edition of the Synthetic Metals' journal.

Q So that means that these Articles In Press have not yet been published in hard copy; correct?

A That's my understanding.

Q And is the Ma article listed on this archived web page?

A It is, yes.

Q So am I correct in concluding that as of December 2nd, 2008, the Ma article had not yet been published in hard copy?

A That's my understanding. Although, it is possible for paper copies of this journal that were released in December 2008 to have been published near or slightly before this date, and for the web page to not be fully reflective of the exact date of publication, especially when a journal article -- there is typically assigned a month and year of publication, not a specific date.

Q Do you know the specific date that the Ma article was in fact published in hard copy?

A Only the month, which would be December 2008.

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Q And am I correct that you don't have any personal knowledge of whether Synthetic Metals' journal articles were in fact published -- well, strike that.

And am I correct that you do not have any personal knowledge of whether Synthetic Metals' journal articles listed as Articles In Press, in August of 2008, were in fact published at or before that time?

MR. GARR: Objection.

THE WITNESS: Just for clarification, are you asking me if I have any personal knowledge whether or not these Articles In Press, designated as Articles In Press in August, were eventually published in the paper edition?

BY MR. WARRICK:

Q No. Let me rephrase.

Do you have any personal knowledge that Synthetic Metals' journal articles that had been published were still listed as Articles In Press in 2008?

A The only personal knowledge I would have is in reference to the passage on Page 53 of this document, which describe the processes in which Elsevier would take an article, denoted articles, and as an Articles in Press, and formalize the publication of that article.

Q If we could look specifically at Page 51 of

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Exhibit 1037. This is still within Appendix 2. And specifically Item 65.

Am I correct that that is referring to the Ma article?

A That's my understanding, yes.

Q And am I correct that you rely in part on the "Purchase PDF" option for the Ma article, Item 65 in Appendix 2, in part for your conclusion that the Ma article was publicly available in August of 2008?

A That's correct.

Q But your declaration includes no evidence that this Purchase PDF option was available in connection with the Ma article prior to December 2nd, 2008, does it?

MR. GARR: Objection.

THE WITNESS: The only indication that this Purchase PDF link would be available, prior to the date captured by the Internet Archive, would be in the August 2008 date claimed by the paper itself and by the declaration from Elsevier.

BY MR. WARRICK:

Q But you don't personally know whether the Purchase PDF option was available on this web page prior to December 2nd, 2008 for the Ma article; correct?

MR. GARR: Objection.

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THE WITNESS: The only knowledge I have related to the specific Purchase PDF link is related to this December capture.

BY MR. WARRICK:

Q And you also don't personally know whether the Ma article was in fact listed as an Articles in Press on this website prior to December 2nd, 2008; correct?

A I don't have any direct confirmation that this article was listed as an Articles in Press. But the implication of the August date present on the paper and in the Garland declaration indicates that as this paper was available online as of August 2008; and, therefore, accessible via the Elsevier website, that it is highly likely that it would be then considered an Articles in Press as the article had not yet been included in the physical edition.

Q But you do not personally have any knowledge that the Ma article was listed on this website prior to December 2nd, 2008; correct?

MR. GARR: Objection.

THE WITNESS: I may ask for clarification here.

When you ask "this website," do you mean this page specifically captured in the appendix, or the

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Elsevier ScienceDirect website broadly?

BY MR. WARRICK:

Q Well, let's start with this particular page.

A For this page, I only have knowledge of the December capture presented as the appendix of this.

(Reporter clarification.)

THE WITNESS: For this page, I only have knowledge of the December capture included as the appendix of this declaration.

BY MR. WARRICK:

Q And is your answer different for the Elsevier ScienceDirect website broadly?

A It would be, yes.

Q And what evidence do you cite in your declaration that the Ma article was available on the Elsevier ScienceDirect website prior to December 2nd, 2008?

A I cite the August date available on the paper. I cite the August date mentioned in the Garland declaration, as well as some corroborating exhibits discussing Articles In Press and their availability on the Elsevier site.

I apologize for the noise outside. I don't know what that's about.

MR. WARRICK: Oh. It's not coming through.

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THE WITNESS: Okay. Good. Good. Sorry.

BY MR. WARRICK:

Q Again, just to clarify, although you rely on various documents in reaching your conclusion about the availability of the Ma article, you're not personally aware of the Ma article being available online prior to December of 2008; correct?

A The only personal experience I would have would be reviewing and discussing the documents included within the declaration. I would not have personal experience for saying -- for example, accessing the Ma article at the time.

Q And to be clear, the only evidence included in your declaration, specifically purporting to show that the Ma article was available online to the public on August 29th, 2008, is the date on the Ma article itself; correct?

A As well as the date mentioned in the Garland declaration.

Q But your declaration does not include any additional evidence purporting to show that the Ma article was available online to the public on August 29th, 2008; correct?

A The material included in this declaration that discusses Articles In Press and their availability,

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I believe is directly relevant to the Ma article and its status as an Articles in Press. Although, none of those materials directly mention Ma.

Q Again, I just want to be clear that you do not rely on any evidence, other than the date listed on the Ma article and the Garland declaration, that specifically purports to demonstrate that the Ma article was available to the public on August 29th of 2008?

MR. GARR: Object to form.

THE WITNESS: I rely on the date on the paper itself. I rely on the Garland declaration. It feels relevant to note that Appendix 2 that we are reviewing right now also reflects that date.

But I do not have any specific information on the Ma article's availability before this December capture. Only discussions of the definition of Articles In Press and their availability via Elsevier.

BY MR. WARRICK:

Q If you go back to Page 51 of Exhibit 1037.

And this is again Appendix 2, Line 65, which relates to the Ma article?

A Yes.

Q Earlier we were discussing this Purchase PDF link.

Do you recall that?

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A I do.

Q And are you personally aware of whether the Purchase PDF links on the Elsevier website in fact allowed Internet users to purchase copies of journal articles as of August 2008?

A I understand that such articles were available for purchase as Articles In Press. As for this specific PDF link, the Internet Archive did not capture that link. And as such I am not able to discuss where that link would redirect the user to.

Q And what is the basis for your statement that you understand that such articles were available for purchase as Articles In Press?

A I would say that the note that materials are available, such as the front of the article, as well as the declaration from Garland. There are also other materials included in this declaration as appendices, which discuss the availability of Articles In Press via the Elsevier platform.

Q Have you ever purchased an online article from Elsevier, Ms. Munford?

A No. I typically access Elsevier articles via library database access.

Q So is it fair to say you are not familiar with the process for purchasing articles online from

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Elsevier?

A I'm not familiar with the experience of personally purchasing an individual article from Elsevier. I have been involved with the database subscription process during my time working in libraries.

Q So, for example, you would not -- you're not familiar with what would happen in August of -- in December of 2008 if an Internet user were to click this Purchase PDF option for the Ma article?

A I would not have personal experience of that process. At the time I was accessing Elsevier journals via library database access, which would have allowed access to the articles free of charge.

Q So you don't have any knowledge, for example, whether any member of the public could purchase a PDF of the Ma article using this link?

A Using this link specifically, I do not have personal experience of that.

Q And assuming someone could use this link to purchase a copy of the Ma article in December of 2008, you have no knowledge of when that article would be delivered to the purchaser; correct?

A As I have no direct experience purchasing the material, yes. In my experience using this database at

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the time, the article would have been accessible instantly.

Q But again, your experience was not in purchasing articles at the time; correct?

A Correct. It was accessing them via library subscription.

Q Now, on Line 65 on Page 51 of Exhibit 1037, states that the -- states "In Press, Corrected Proof"...

Do you see that?

A I do.

Q And what's your understanding of that notation?

A I understand "In Press" to mean materials that have been made available online prior to the formal publication in a physical journal.

The phrase "Corrected Proof" I will refer to Page 53 of the declaration, in which the page states:

"Corrective Proofs. These are articles containing the author's corrections and may or may not yet have specific issue and page numbers assigned."

Q And am I correct that your opinion that the Ma article was available without substantial -- without substantive revision in August of 2008 -- you know, strike that.

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Am I correct that your opinion that the Ma article was available to the public online as of August 29th, 2008, in substantively the same form as the version that was published in December of 2008, relies on this "In Press, Corrected Proof" notation in Appendix 2?

MR. GARR: Objection.

THE WITNESS: My conclusion is based on that denotation in Appendix 2, as well as the lack of a revised note present on the article itself of the Ma paper that is present on the papers included in this declaration as appendices 1 and 3.

BY MR. WARRICK:

Q Is that conclusion based on any additional evidence?

A Not that I can recall.

Q Ms. Munford, do you have any evidence that this In Press, Corrected Proof notation was provided in connection with the Ma article prior to December 2nd, 2008?

A I do not.

MR. WARRICK: We've been going just over an hour.

Would this be a good time for a brief break?

THE WITNESS: I'd be comfortable with that.

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MR. GARR: Good with me. Thanks.

MR. WARRICK: Is five minutes enough?

THE WITNESS: That's good with me.

MR. GARR: Yeah.

MR. WARRICK: All right. See you in five minutes.

(Whereupon, a recess was held from 10:08 a.m. to 10:16 a.m.)

BY MR. WARRICK:

Q Welcome back, Ms. Munford.

A Welcome back.

Q Before we get started, did you have any discussions with anyone during our break?

A No.

Q Before the break we were talking about Appendix 2 to your declaration, Exhibit 1037.

Before we move on, just to clarify, you don't have any evidence that the Ma article was in fact listed on this Articles In Press web page prior to December 2nd, 2008; correct?

MR. GARR: Objection.

THE WITNESS: Correct. The Articles In Press web capture I have is dated December, and I do not have any previous captures to rely on.

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BY MR. WARRICK:

Q I'd like to turn to Appendix 4 to your declaration. Starts at Page 60 of Exhibit 1037.

A I'm there.

Q And what is this document?

A This is a capture of a Wayback Machine record for an Elsevier ScienceDirect page called Make ScienceDirect Yours, TOP 25 Hottest Articles.

Q Do you know if the Ma article was ever listed on the ScienceDirect Top 25 Hottest Articles list?

A I do not.

Q And your declaration does not include any evidence of what articles were listed on that list; correct?

A Correct.

Q I'd like to turn to Appendix 7 to your declaration. Starts at Page 69 of Exhibit 1037.

A I'm there.

Q What is this document?

A This is a capture from the Scimago JR entry for Synthetic Metals, the journal in which Ma was published.

Q What is Scimago JR?

A Scimago JR is an indexing service that indexes various academic publications, and measures

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their usage statistics and subjects.

Q Am I correct that Exhibit 7 does not include any information specific to the Ma article?

A That's correct.

Q If we look at Page 71 of Exhibit 1037 within Appendix 7, I see various charts.

Do you see those?

A I do.

Q One of those is labeled "SJR."

Do you see that?

A I do.

Q What does SJR mean?

A I believe the SJR is a chart noting Synthetic Metals' impact factor from what looks to be 1999 to 2023.

Q What's your understanding of the impact factor?

A An impact factor is a relative measure of a journal's popularity and impact within its field as measured by citations and number of documents listed within the journal.

Q Now, according to this chart, the Synthetic Metals' journal in 2008 had an SJR impact factor of roughly 1.2; is that right?

A Yeah, somewhere around there. It's relative.

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It's difficult to tell exactly where that would land. But I would say between -- somewhere between 1 and 1.2.

Q Am I correct that there are other journals within the same or similar fields that have significantly higher impact factors than 1.2?

A I suppose it's theoretically possible, but I did not review any of the Scimago JR impact factors for related journals in my analysis.

Q There's also a chart on Page 71 labeled "Total Documents."

What does that refer to?

A I believe that refers to the total number of citable documents published that year.

Q There's also a chart labeled "Total Cites"?

What does that refer to?

A I believe that would refer to citations to the journal.

Q And this document does not evidence which particular articles have been cited; correct?

A It's possible that the data is derived from individual article information, but it does not include any article-specific information in this record.

Q And it appears from Page 71 in Appendix 7 that the total cites for the Synthetic Metals' journal were at their lowest point in approximately 2008; is

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that right?

A I think there's some ambiguity as to whether or not that would be 2008 or 2009. But I can note the downward trend referenced in between those two dates.

Q And you would agree that the 2008 to 2009 period in that chart is the lowest point of the total cites indicator; correct?

A Correct.

Q There's also a reference on the bottom of Page 71 to "Non-citable documents."

What's your understanding of that label?

A That I don't fully know. I could make inferences, but nothing I'd be comfortable without doing some further research.

Q And on Page 72 of Exhibit 1037, there's a reference to "Uncited documents."

Do you have an understanding of that term?

A My understanding of that term is materials not cited within those date ranges, but still published within the Synthetic Materials' [sic] journal.

Q So according to that chart in Appendix 7, there are Synthetic Metals' articles that have not been cited; correct?

A That would be the inference from the chart, yes. Although I don't have any particular knowledge of

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any article in specific.

Q And am I interpreting that chart correctly that from roughly 2002 to approximately 2008 to 2009, there is roughly a downward trend in the number of cited documents for the Synthetic Metals' journal?

A I would agree with your assessment that there is a downward trend, although there were occasional spikes upwards in the early part of the 2000s.

Q And there's another chart on Page 72 labeled "Estimated APC."

Do you have an understanding of that label?

A I do not without further research on my part.

Q I would like to turn to Appendix 8, which starts at Page 75 of Exhibit 1037.

A I'm there.

Q Can you describe this document for me?

A This is a capture of the Exaly entry for Synthetic Metals indexing the journal similar to the Scimago indexing.

Q Now, am I correct that this document also does not include any information specific to the Ma article?

A That's correct.

Q In fact, it does not include any information significant to any particular article; correct?

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A Correct.

Q On Page 76 of Exhibit 1037 there's a chart showing an impact factor.

Is that the -- how does that relate to the impact factor in Appendix 7?

A The impact factor is a proprietary number that is tracked by an individual indexing services. So the impact factor determined from Scimago is based on specific sources of data. And the impact factor of Exaly is based on different sources of data.

Q That same chart has a percentile. It includes percentile data, I should say; is that right?

A Correct.

Q Is it your understanding that the percentile represents the relative ranking of the impact factor over time?

A I would say that there are multiple materials tracking the percentiles. Impact factor is one of them. But there are also percentiles for papers, citation, H index, G index and extended IF.

Q Let me ask it this way: Do you have an understanding of what this percentile data reflects?

A In this instance, it would refer to the relevancy of the Synthetic Metals' journal, among similar materials.

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So, for instance, the fact that this website notes that Synthetic Metals is within the top 1 percent of citations means that in comparison to other similar journals, this is within the top 1 percent of the number of citations to the journal.

Q Am I interpreting Appendix 8 correctly that Synthetic Metals is also within the top 1 percent of number of papers published?

A That's my understanding as well.

Q You testified that these numbers are in comparison to other similar journals.

What did you mean by that?

A Services like Exaly and Scimago track statistics such as number of papers and citations amongst a variety of academic publications, including other journals. The comparisons that determine the percentiles are based on the comparisons of those statistics from Synthetic Metals to the other journals being tracked.

(Reporter clarification.)

THE WITNESS: Tracked.

BY MR. WARRICK:

Q Okay. Do I understand you correctly, then, the comparisons are to all the other journals being tracked by the Exaly website?

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A That's my understanding. Although I should note it is also possible that Exaly tracks, for instance, conference proceedings, which would be different than journals but able to be tracked in a similar way.

Q Do you know approximately how many journals are tracked by Exaly?

A I do not.

Q Do you know approximately how many journals are tracked by Scimago?

A I do not.

Q I would like to turn to Appendix 9 of your declaration starting on Page 77 of Exhibit 1037.

A I'm there.

Q Can you describe this document, please?

A This document is a Wayback Machine record captured August 28th, 2008 of the Advanced Product Search feature on the Elsevier website.

Q Does your declaration include any examples of using this Advanced Product Search on the Elsevier website in 2008?

A It does not. Due to access restrictions based on search engine queries, the Internet Archive typically does not capture pages such as search results.

Q So it's also correct that your declaration

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does not include any examples of search results from 2008?

A Correct.

Q If we could go back to the body of your declaration. I would like to go to Page 16 of Exhibit 1037.

A Got it.

Q And beginning with Paragraph 38, you're describing Appendix 9 that we just looked at; correct?

A That's correct.

Q And if we look specifically at Paragraph 39, which goes to the next page, Page 17, you say:

"Based on my experience, this search feature is equally robust as the search features included in a typical library catalog."

What experience are you referring to in that sentence?

A This page describes the advanced search features of this database. So the ability to search for a variety of fields, the ability to search for multiple fields, the ability to filter your results, as well as the individual fields being referenced, such as a keyword search, title, author, ISBN/ISNN.

Those are all features that are typical of

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every library catalog that I've written catalog records for or interacted with in my experience as a librarian.

Q Am I correct that your declaration includes no evidence of how the search functionality on the Elsevier website functioned in 2008?

A I guess I would disagree with that assertion just based on this paragraph in specific, describing all of the fields in which a user could interact with and the ways that you could filter your results. I believe that the presence of these fields tells us quite a bit about how Elsevier indexes its materials, as users would not be able to search by these fields if they were not indexed by Elsevier.

Q But the only evidence included in your declaration regarding the search capabilities of the Elsevier website in 2008 are the archived web pages attached to your declaration; correct?

A That's correct.

Q Paragraph 39 of your declaration, in the last sentence, also states that:

> ..."Appendix 9 indicates that a Synthetic Metals was indexed by Elsevier according to keyword, publication title, author, editor, ISBN/ISSN, publication date,

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pre-assigned subjects, and publication type."

Do you have -- does your declaration include any evidence that Synthetic Metals was, in fact, indexed by Elsevier according to those criteria?

MR. GARR: Objection.

THE WITNESS: I believe some of the Internet archived captures being discussed include bibliographic data such as key words, publication titles, authors, et cetera. And so I have no affirmative evidence showing all of the fields in which Synthetic Metals had been indexed.

But its presence within the Elsevier database, as well as the proliferation of these search options, indicates that those fields would be present in Elsevier's records for Synthetic Metals as a prerequisite of being included within the collection.

BY MR. WARRICK:

Q Your declaration does not include any opinion regarding when the Ma article was indexed by Elsevier for Internet searching, does it?

A Only to the extent that the article is mentioned as being available in August 2008. And the December capture of the Articles In Press page, which contains an entry for the Ma paper, including several

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pieces of bibliographic data such as author and title, that would have been indexed by this database.

Q I'd like to be clear.

None of those documents indicate that the Ma paper was, in fact, indexed for Internet searching; correct?

A My understanding of the Elsevier database is that for the material to be present within the database, it would also need to be indexed to show up in search results, or to be displayed on a given page, such as the Articles In Press page.

Q What is the basis for that understanding?

A The existence of the article within the database itself. So it would be highly unusual for a material to be included in such a database without proper indexing, so that it could be made available on pages such as the Articles In Press page.

Q Is it not possible that an article could be listed on the Articles In Press page and not be indexed for searching on other pages within the Elsevier website?

A I suppose it is possible, but I would find that unusual.

Q But you personally do not know when the Ma article was indexed for Internet searching; correct?

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A I can only speak on the Ma article's presence within the Elsevier database, and its inclusion on the list of Articles In Press as positive evidence of that indexing based on the existence of the bibliographic data represented on that page.

Q And your declaration does not include any evidence that the Ma article was indexed by Elsevier according to keyword; correct?

A Allow me to review real quick.

(Document reviewed by the witness.)

THE WITNESS: Declaration doesn't include information that the Ma article was indexed by keyword. Although, I believe the Synthetic Metals' journal was.

BY MR. WARRICK:

Q Am I correct that your declaration doesn't include any specific evidence that the Synthetic Metals' journal was indexed according to keyword?

A Allow me to review.

(Document reviewed by the witness.)

THE WITNESS: I don't believe that there is any evidence that this journal was indexed by Elsevier at the time.

BY MR. WARRICK:

Q And your declaration also includes no evidence that Articles In Press were searchable using

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this website; correct?

A I believe that the --

MR. GARR: Objection.

THE WITNESS: I believe that the Articles In Press designation, included in the Articles In Press page, indicates that it was discoverable within the Elsevier database. But I do not see any affirmative evidence that Articles In Press were included within those searches. I also don't see any evidence that excludes Articles In Press.

BY MR. WARRICK:

Q I'd like to turn to Appendix 11 of your declaration, beginning at Page 83 of Exhibit 1037.

A All right. I'm there.

Q Can you please describe this document?

A This document is a capture of the modern ScienceDirect page searching for the phrase "electron transport layer."

Q And this reflects a search that you personally performed; correct?

A Correct.

Q And you performed that search on August 4th, 2025?

A Correct.

Q And this was the result of a title search;

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correct?

A That's correct.

Q Your declaration does not include any examples of keyword searches; correct?

A Correct.

Q And your declaration also includes no evidence that the search capabilities of the Elsevier ScienceDirect website in 2008 were similar to those in 2025; correct?

A I believe based on the Internet Archive captures of the Advanced Search page from 2008, that the Elsevier database, at the time, would still have been capable of searching by the title electron and transport layer, or filtering by year.

Q Am I correct that you are not familiar with the underlying search algorithms of the Elsevier website?

A That's correct.

Q Are you aware of evidence submitted in connection with this case regarding delays in indexing Elsevier journal articles for Internet searching?

A I am not.

Q Let's turn to Appendix 12 if we could, please, starting at Page 85 of Exhibit 1037.

A I'm there.

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Q Can you describe this document?

A This is a capture of a Wayback Machine record for the search tips page on the Elsevier website dated July 26th, 2008.

Q Am I correct that there is nothing in Appendix 12 that indicates that Articles In Press are included in searches -- the searches described?

A Allow me to review.

(Document reviewed by the witness.)

THE WITNESS: I do not see any language that specifically mentions Articles In Press. But there are -- rather, there is language indicating that the product search allows you to search the information about all Elsevier products that can be acquired, as well as a passage that reads:

"This includes a search through all online available full texts from Elsevier products."

BY MR. WARRICK:

Q Are you aware of a distinction between Elsevier online journal articles that are available in all text and those available as PDF documents?

A I suppose there are distinctions that could be made, but I do not have any personal knowledge of the distinctions between the two. And my experience would

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indicate that if a material was available in full text for purchase from the Elsevier website, that would be indicative of being included and discussed within the search page.

Q But I believe you have testified that you used the ScienceDirect website in the 2008 timeframe; is that right?

A That's correct.

Q Did you ever personally access Articles In Press from Elsevier in 2008?

A I don't recall which materials I accessed in 2008.

Q What about earlier than 2008?

A I wouldn't recall any specific materials at the time either.

MR. WARRICK: Okay. I think if we could -- I know it's not been a full hour. It'd be helpful to take just a brief five-minute break. I don't believe I have that much more material remaining.

Does five minutes work for everyone?

THE WITNESS: It's good with me.

MR. WARRICK: All right.

MR. GARR: Sounds good.

THE WITNESS: Thank you.

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(Whereupon, a recess was held
from 10:56 a.m. to 11:05 a.m.)
BY MR. WARRICK:
Q Welcome back, Ms. Munford.
A Welcome back.
Q Did you have any discussions during the break?
A I did not.
MR. WARRICK: I'm introducing another exhibit. It should be available to you as Exhibit 1.
(Whereupon, Patent Owner Exhibit 1 was marked for identification by the Court Reporter.)
THE WITNESS: Got it.
BY MR. WARRICK:
Q Do you recognize this document?
A This appears to be the Articles In Press page for Synthetic Metals.
MR. GARR: Can I ask to stop for a second. Where do I get this document?
MR. WARRICK: It should be in the Exhibit Share, if you have that set up, along with Exhibit 1007, 1037.
Are you able to access it?
MR. GARR: Yeah. Sorry. It's just I'm

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trying to find the correct tab.

What's the login ID for this? Can we tell?

THE REPORTER: Do you want to go off the record?

MR. GARR: Sure.

(Whereupon, a recess was held from 11:07 a.m. to 11:09 a.m.)

MR. WARRICK: Go back on the record.

BY MR. WARRICK:

Q All right. Ms. Munford, do you recognize Exhibit 1 that I just introduced?

A I recognize it. Sorry.

Q I apologize. You already answered that.

And I will represent to you that this is another Internet Archive Wayback Machine archive of the Synthetic Metals' Articles In Press page from the ScienceDirect Elsevier website.

A That is the -- oh, sorry. Go ahead.

Q Oh, go ahead.

A I was just going to a say that seems correct, and it appears to be an earlier capture from April '08.

Q Yes. It's purportedly April 6, 2008.

And I would like to draw your attention to the articles that are listed in Exhibit 1.

And so, for example, if we look at the first

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article, "Short-term heating test on doped polypyrrole-coated polyester fabrics." I may be mispronouncing that.

Under that article there are links for "Abstract," a separate "Full Text + Links," and another link for "PDF."

Do you see that?

A I do.

Q And if we look back to your Appendix 2 version of this website, and specifically at Entry 65, which is the Ma paper on Page 51 of Exhibit 1037.

A Okay. I'm there.

Q For the Ma's paper entry on December 2nd, 2008 of the archived web page there is no link for full text as there is for several of the articles in the version in Exhibit 1; correct?

A Do you mind repeating the finish there. It cut you off.

Q Oh. So there's no link for full text of the Ma article in Appendix 2 as there is for several of the articles in Exhibit 1; correct?

A That appears to be the case. Although, I would note that the capture I have made, which is dated December '08, doesn't appear to contain any links to a Full Text + Link's version of these articles,

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indicating that perhaps this is a reprioritization by Elsevier or a change in the display technology.

Q However, your declaration does not include any evidence that a full text version of the Ma article was available on the ScienceDirect Articles In Press website; correct?

A I would say that my testimony indicates that a PDF copy of this article was purchasable, and there is no reason for me to doubt that the PDF would include the full text of the article, based on the context included in the exhibit you provided, it is possible that Full Text + Links merely points towards an HTML version of the articles, in addition to a PDF version.

Q And you would agree that not all PDF documents are text searchable; correct?

A I would agree in theory. Although many programs that allow you to review PDFs are capable of introducing text searchability into documents without it.

Q So you would agree that in the context of the Elsevier website there may be a distinction between being able to purchase a PDF of a journal article and being able to access the full text, as appears to be available in Exhibit 1 for several of the listed articles?

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MR. GARR: Objection.

THE WITNESS: I would agree that there seems to be a distinction between the full text links and the PDF link that are present in this exhibit that you've shared. I also believe it's possible that these are two different data formats of the same material.

BY MR. WARRICK:

Q Going back to Appendix 12, and specifically Page 87 of Exhibit 1037.

A All right. I'm there.

Q You had previously referenced some text on this search tips page regarding online available full texts.

Do you recall that?

A I do.

Q Do you recall where specifically in Appendix 12 you were referencing that information?

A I do. Specifically on Page 87 under the heading "All Elsevier Sites Search," which discusses full text search results and mentions that all online available full texts are included in the searches.

Q And am I correct in that All Elsevier Sites Search is distinct from the Advanced Product Search that we reviewed in a different Appendix?

A Allow me to review the previous Appendix.

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(Document reviewed by the witness.)

THE WITNESS: It would seem that there are slight differences as the All Elsevier Sites Search mentions being able to search the corporate element of the website as well.

BY MR. WARRICK:

Q Well, in addition, Appendix 12 describes various types of searches that could be performed under the Advanced Product Search, similar to what we saw in Appendix 9, including, for example, keyword searches or ISBN searches that are not included in the description of the All Elsevier Search; correct?

A That seems to be true, yes.

Q And you would have to agree with me that simply because a PDF of a journal article is available on a website, that does not indicate that searchable text of that same article is also available on the website; correct?

MR. GARR: Objection.

THE WITNESS: I would say that there is no definitive correlation between the two. You could have examples of material where full text be present and the PDF is not. You could also have examples where the PDF is present and the full text is not.

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BY MR. WARRICK:

Q And your declaration doesn't include any evidence specifically showing that the full text of the Ma article was available in searchable form on August 29th, 2008; correct?

MR. GARR: Objection.

THE WITNESS: I provided no evidence that individuals would be able to search the entirety of the full text of the MA document; although the information that I provided does indicate that users would be able to search and discover the Ma document, and by accessing the PDF copy, gain access to the full text.

BY MR. WARRICK:

Q All right. I'd like to turn to Appendix 14 of your declaration, beginning at Page 93 of Exhibit 1037.

A I'm there.

Q Can you please describe this document.

A This is a Wayback Machine capture of the Penn State University library's website describing the various databases accessible via Penn State as of March 25th, 2008.

Q And your declaration references the fact that on Page 108 of Exhibit 1037 Elsevier ScienceDirect is listed in Appendix 14?

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A That's correct.

Q And if we look at that specific entry on Page 108 of Exhibit 1037, under Elsevier ScienceDirect, full text journal articles, the document states:

"The system provides access to the electronic versions of the Elsevier journals that we subscribe to"...

However, there is no indication in Appendix 14 as to whether or not Penn State University subscribed to the Synthetic Metals' journal in particular; correct?

A That's correct.

Q And your declaration includes no evidence that Penn State did in fact subscribe to the Synthetic Metals' journal; correct?

A That's correct.

Q The Elsevier ScienceDirect entry in Appendix 14 also states:

"Current issues and back files are included."

But it does not include any representation about Articles In Press; correct?

A That's correct.

Q Is it also correct that your declaration includes no evidence of any individual accessing the Ma article in August of 2008?

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A That's correct.

MR. WARRICK: Well, thank you. I have no further questions at this time.

THE WITNESS: Thank you.

MR. GARR: Why don't we take a ten-minute break.

THE WITNESS: Sounds good.

MR. WARRICK: Okay.

(Whereupon, a recess was held from 11:24 a.m. to 11:35 a.m.)

MR. GARR: No questions from our side.

MR. WARRICK: Thank you, everyone.

THE WITNESS: Thanks.

(Whereupon the deposition proceedings were concluded at 11:36 a.m.)

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STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, JUNE ANN MUNFORD, declare under penalty of perjury that the foregoing testimony is true and correct to the best of my knowledge and belief.

Dated this ___ day of _____, 2025.

_____

(JUNE ANN MUNFORD)

JOB NO. 7557883

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STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss.

I, D'Anne Moungey, C.S.R. No. 7872 in and for the State of California, do hereby certify:

That prior to being examined, the witness named in the foregoing deposition was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That said deposition was taken down by me in shorthand at the time and place therein named and thereafter reduced to typewriting under my direction, and the same is a true, correct, and complete transcript of said proceedings;

That if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript {XX } was { } was not required.

I further certify that I am not interested in the event of the action.

Witness my hand this September 4, 2025

Certified Shorthand Reporter
For the State of California

Pictiva EX2059
Samsung v Pictiva
IPR2024-01094

DAVID A. GARR

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September 4, 2025

RE: Samsung Display Co., LTD. v. Pictiva Displays International

9/3/2025, June Ann Munford, (#7557883).

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Samsung Display Co., LTD. v. Pictiva Displays International

June Ann Munford (#7557883)

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California Code of Civil Procedure

Article 5. Transcript or Recording

Section 2025.520

(a) If the deposition testimony is stenographically recorded, the deposition officer shall send written notice to the deponent and to all parties attending the deposition when the Original transcript of the testimony for each session of the deposition is available for reading, correcting, and signing, unless the deponent and the attending parties agree on the record that the reading, correcting, and signing of the transcript of the testimony will be waived or that the reading, correcting, and signing of a transcript of the testimony will take place after the entire deposition has been concluded or at some other specific time.

(b) For 30 days following each notice under subdivision (a), unless the attending parties and the deponent agree on the record or otherwise in writing to a longer or shorter time period, the deponent may change the form or the substance of the answer to a question, and may either approve the transcript of the deposition by signing it, or

refuse to approve the transcript by not signing it.

(c) Alternatively, within this same period, the deponent may change the form or the substance of the answer to any question and may approve or refuse to approve the transcript by means of a letter to the deposition officer signed by the deponent which is mailed by certified or registered mail with return receipt requested. A copy of that letter shall be sent by first-class mail to all parties attending the deposition.

(d) For good cause shown, the court may shorten the 30-day period for making changes, approving, or refusing to approve the transcript.

(e) The deposition officer shall indicate on the original of the transcript, if the deponent has not already done so at the office of the deposition officer, any action taken by the deponent and indicate on the original of the transcript, the deponent's approval of, or failure or refusal to approve, the transcript. The deposition officer shall also notify in writing the parties attending the deposition of any changes which the deponent timely made in person.

(f) If the deponent fails or refuses to approve the transcript within the allotted period, the

deposition shall be given the same effect as though it had been approved, subject to any changes timely made by the deponent.

(g) Notwithstanding subdivision (f), on a seasonable motion to suppress the deposition, accompanied by a meet and confer declaration under Section 2016.040, the court may determine that the reasons given for the failure or refusal to approve the transcript require rejection of the deposition in whole or in part.

(h) The court shall impose a monetary sanction under Chapter 7 (commencing with Section 2023.010) against any party, person, or attorney who unsuccessfully makes or opposes a motion to suppress a deposition under this section, unless the court finds that the one subject to the sanction acted with substantial justification or that other circumstances make the imposition of the sanction unjust.

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VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the deposition officer. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the deposition officer and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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