

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, D.C.

In the Matter of)
CERTAIN HIGH-STRENGTH)
ALUMINUM OR ALUMINUM) Inv. No.
ALLOY-COATED STEEL, AND) 337-TA-1402
AUTOMOTIVE PRODUCTS AND)
AUTOMOBILES CONTAINING SAME)
_____)

VIDEO-RECORDED DEPOSITION OF

RONALD KEFFERSTEIN

Brussels, Belgium

Friday, November 15, 2024

Reported Stenographically By:
PATRICIA A. BIDONDE
Registered Professional Reporter
Realtime Certified Reporter
JOB#: 6745305

Page 1 of 75

Ex. 2010
IPR2024-01376

November 15, 2024
9:09 a.m.

Video-Recorded Deposition of
RONALD KEFFERSTEIN, held at the offices
of Gibson, Dunn & Crutcher LLP, Avenue
Louise 480, 1050 Brussels, Belgium,
before Patricia A. Bidonde,
Stenographer, Registered Professional
Reporter, Realtime Certified Reporter,
Certified eDepoze Court Reporter, Notary
Public of the States of New York, New
Jersey, and Connecticut.

A P P E A R A N C E S

GIBSON, DUNN & CRUTCHER LLP

Attorneys for ArcelorMittal Tailor Blanks and
the Witness

200 Park Avenue

New York, New York 10166-6210

BY: ALLEN KATHIR, ESQ.

212-351-6282

akathir@gibsondunn.com

2001 Ross Avenue

Suite 2100

Dallas, Texas 75201-2923

BY: MARK REITER, ESQ.

214-698-3360

mreiter@gibsondunn.com

ARCELORMITAL TAILORED BLANKS GENT

In-house Counsel

John Kennedylaan 51

9042 Gent, Belgium

BY: JONATHAN LOBEL, ESQ.

+32-(0)9-347-31-11

A P P E A R A N C E S (Continued)

FISH & RICHARDSON P.C.

Attorneys for Respondent VinFast

1000 Maine Avenue SW

Suite 1000

Washington, D.C. 20024

BY: DANIEL Y. LEE, Ph.D., ESQ.

202-626-6412

lee@fr.com

BY: JACK R. WILSON, IV, ESQ.

202-626-6415

jwilson@fr.com

ALSO PRESENT:

GRANVILLE FIELDS, French Interpreter

CHRISTIAN BIDONDE, Legal Video Specialist

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P R O C E E D I N G S

- - -

THE VIDEOGRAPHER: We are now on the record. The time is 9:09 a.m. on November 15, 2024. Audio and video recording will continue to take place until all parties agree to go off the record. Please note that microphones are sensitive and may pick up whispering and private conversations.

This is the video-recorded deposition of Ronald Kefferstein in the matter of Certain High-Strength Aluminum et al. This deposition is being held at the offices of Gibson, Dunn & Crutcher LLP in Brussels, Belgium.

My name is Christian Bidonde. I am the legal video specialist. The certified stenographer is Patricia Bidonde on behalf of U.S. Legal Support.

Counsel will state their appearances for the record.

MR. LEE: Daniel Lee of Fish & Richardson on behalf of the VinFast

1 respondents, and with me is my colleague
2 Jack Wilson also of Fish & Richardson.

3 MR. KATHIR: Allen Kathir from
4 Gibson, Dunn & Crutcher on behalf of the
5 complainants. With me is Mark Reiter
6 from Gibson, Dunn & Crutcher also on
7 behalf of the witness.

8 G R A N V I L L E F I E L D S, appeared to
9 interpret the questions from English
10 into French, and the answers from
11 French into English.

12 R O N A L D K E F F E R S T E I N, appeared,
13 having agreed to tell the truth,
14 answered with the assistance of the
15 interpreter as follows:

16 EXAMINATION BY

17 MR. LEE:

18 Q. Good morning.

19 A. Good morning.

20 Q. Could you please state your name
21 for the record.

22 A. My name is Ronald Kefferstein.

23 Q. Could you state your address for
24 the address, please?

25 A. I live in Mouries, in the Provence

1 region of France.

2 Q. Have you been deposed before?

3 A. No.

4 Q. So I'll be giving you some
5 instructions about this deposition process
6 today.

7 So you understand that you're
8 testifying as if under oath. Right?

9 A. Yes.

10 Q. And that means you have to tell
11 them the truth. Right?

12 A. Yes.

13 Q. And you understand that the
14 testimony you give today is just as important
15 as if you are giving it in a court before a
16 judge. Right?

17 A. I understand that.

18 Q. You'll give truthful, complete,
19 and accurate testimony today. Right?

20 A. Yes.

21 Q. So I'm going to ask you a series
22 of questions today. And your counsel may
23 lodge objections from time to time, but unless
24 your counsel instructs you specifically not to
25 answer, you do have to answer my questions.

1 Do you understand that?

2 A. Okay.

3 Q. And if you ever do not understand
4 my question, please tell me. Okay?

5 A. Okay.

6 Q. And if you -- that means if you
7 answer a question, I'll assume that you
8 understood that question. Okay?

9 A. Okay.

10 Q. If you ever want to take back,
11 change, or correct an answer that you have
12 given, let me know. Okay?

13 A. Okay.

14 Q. So as you see, our court reporter
15 is typing up everything we say and into a
16 transcript. So that means you have to give
17 audible answers.

18 Do you understand that?

19 A. Okay.

20 Q. Is there any reason, medical or
21 otherwise, that you cannot give truthful
22 testimony today?

23 A. No, there is no such reason.

24 Q. So we'll endeavor to take a break
25 about every hour or so. But if you do ever

1 need a break, just let us know, and we'll make
2 sure to go on a break.

3 A. Okay.

4 Q. Mr. Kefferstein, do you
5 understand why you're here today?

6 A. To some extent, yes.

7 Q. So you understand that you're
8 here today because of a litigation brought by
9 ArcelorMittal.

10 Do you understand that?

11 A. Yes.

12 Q. And it involves certain patents
13 on which you're an inventor. Is that right?

14 A. Yes.

15 Q. When did you find out about this
16 litigation?

17 A. Exactly two weeks ago.

18 Q. And did you prepare for this
19 deposition?

20 A. Very little, two conference calls
21 and I arrived in Brussels yesterday and met
22 with my lawyers.

23 Q. And when were those two
24 conference calls?

25 A. One conference call was just

1 before November the 1st, and the second
2 conference call was this past Tuesday,
3 November 12.

4 Q. And approximately how long were
5 those conference calls?

6 A. Between one and two hours.

7 Q. And who were at those conference
8 calls?

9 A. The lawyers from Gibson Dunn and
10 Jonathan Lobel from the patent department at
11 ArcelorMittal.

12 Q. And other than those people,
13 nobody else was on those conference calls?

14 A. No.

15 Q. So I'd like to ask a little bit
16 about your background. So let's start with
17 your education. Where did you go for your
18 undergraduate degree?

19 A. I earned an engineering degree
20 from a university in Compiegne just outside of
21 Paris.

22 Q. And what type of engineering
23 degree was that?

24 A. Mechanical engineering with a
25 concentration in materials.

1 Q. And did you have any subsequent
2 higher education after that degree?

3 A. No.

4 Q. When did you join ArcelorMittal?

5 A. In 1991 just after I graduated.

6 Q. And was it called Arcelor, or was
7 it called a different company back when you
8 joined in 1991?

9 A. No, at the time it was called
10 Sollac Groupe Usinor.

11 Q. And Sollac Groupe is a department
12 within Usinor?

13 A. Sollac was the name of the
14 factory that manufactured flat steel at
15 Usinor. And at the time Usinor was a French
16 group.

17 Q. And what was the -- what was your
18 title when you first joined? What was Usinor
19 at the time?

20 A. I was a research engineer at a
21 research center.

22 Q. And were you promoted to a
23 different position while you were at Usinor?

24 A. Yes, in 1997 I became department
25 manager at the same research center. In 2003

1 Usinor became Arcelor. There was a merger
2 between the ferrous metallurgy businesses in
3 Belgium and in Spain, and out of that merger
4 came Arcelor group.

5 Q. And when the merger took place,
6 were you still a department manager at the
7 Sollac Groupe research center?

8 A. Yes, but only up until 2003.

9 Q. And after 2003, what title did
10 you take?

11 A. In 2003 I joined the automobile
12 sales division as a product manager.

13 Q. What kind of responsibility does
14 a product manager of the automobile sales
15 division have?

16 A. As the product manager, I was
17 responsible for the Usibor at the time and
18 responsible for developing hot stamping.

19 Q. And by "responsible for Usibor,"
20 could you elaborate a little bit, please?

21 A. I was responsible for promoting
22 Usibor to our customers and supporting them in
23 the implementation of Usibor at their
24 facilities.

25 Q. And were you involved in

1 developing the hot stamping process using
2 Usibor?

3 A. I don't understand the question.

4 Q. Yes. I can clarify that. And
5 before I do that, when you -- we are talking
6 about Usibor, are you referring to
7 Usibor 1500P, the precoated Usibor?

8 A. Yes.

9 Q. And this Usibor 1500P is the
10 aluminum-silicon coated Usibor. Correct?

11 A. Yes.

12 Q. So as part of your promotion of
13 Usibor 1500P to the automotive customers, were
14 you involved in developing the hot stamping
15 process with the customers?

16 A. Yes, I was involved with some of
17 these clients to support them and to help
18 them.

19 Q. And do you recall the names of
20 these clients that you're helping to support
21 in your capacity?

22 A. I do recall a few of them. That
23 was 20 years ago.

24 Q. Could you tell me the names that
25 you do recall?

1 A. I remember first and foremost a
2 legacy company, Sofedit, and I also remember a
3 company named Guesstamp, G-u-e-s-s-t-a-m-p,
4 which was a partner of Arcelor.

5 Q. And did your work involve
6 providing support for Volkswagen?

7 A. I had been to a Volkswagen
8 facility several times, but Volkswagen was
9 very secretive, their process was secret, and
10 it was difficult to gain access to their
11 facilities.

12 Q. Do you recall when your visits to
13 Volkswagen was?

14 A. No, that was over 20 years ago,
15 and I haven't worked in that field since 2007,
16 so I don't recall.

17 Q. Is it fair to say it would be
18 before 2007 that you visited Volkswagen?

19 A. Yes.

20 Q. And did I understand correctly
21 that you have changed to a different
22 responsibility at 2007?

23 A. Yes, at the end of 2007, starting
24 in September, I completely left the technical
25 side of research in hot stamping to move into

1 manufacturing maintenance.

2 Q. I see. So you were an automobile
3 product manager between 2003 and
4 September 2007?

5 A. Yes.

6 Q. And is there a different name for
7 the position that you held, for example, PHS
8 product manager?

9 A. No, my business card, my title
10 was hot stamping product manager.

11 Q. And as a hot stamping product
12 manager, who did you directly report to?

13 A. I had several of them in the
14 sales division of Arcelor automobile. One was
15 John Claude Caillaud and another was Jean-Luc
16 Thirion.

17 Q. And how many people reported to
18 you as the manager?

19 A. I didn't have any people who
20 reported to me.

21 Q. As part of your job as a hot
22 stamping product manager, did you interact
23 regularly with Pascal Drillet?

24 A. Yes, I did interact regularly
25 with a number of people who worked in research

1 including Pascal Drillet.

2 Q. What was the nature of your
3 interactions with Dr. Drillet?

4 A. I would use Mr. Drillet or others
5 on his team when I needed someone to carry out
6 an expert investigation into various parts
7 that the clients sent us.

8 Q. And when were these -- let me
9 withdraw that.

10 Do the clients reach out to you
11 when they're having problems with hot stamping
12 parts using Usibor 1500P?

13 A. Yes, that did happen.

14 Q. And when they're having -- let me
15 ask that again.

16 And when the clients are having
17 problems, and you get a report of that
18 problem, do you reach out to people in the R&D
19 department like Dr. Drillet?

20 A. Exactly.

21 MR. LEE: Give me one moment,
22 please.

23 I have dropped into the chat box
24 what has been marked Exhibit 1, which is
25 AM-ITC-0102170.

1 (Exhibit 1, Expert investigation
2 report beginning Bates Number
3 AM-ITC-0102170, marked for
4 identification, as of this date.)

5 Q. Please let me know when you have
6 that open. Do you have the document open,
7 Mr. Kefferstein?

8 A. Yes.

9 Q. Do you recognize this document?

10 A. I don't recognize this specific
11 document, because we received a lot of them at
12 the time, but I do recognize it generally as
13 being a claim submitted and a request for an
14 expert an investigation into a part.

15 Q. On the upper left of Exhibit 1,
16 do you see where it lists your name as, what I
17 believe is saying "visitor"?

18 A. Yes, that probably means that I
19 attended a meeting, yes.

20 Q. Would this have been a document
21 that you have drafted?

22 A. No, this was prepared by people
23 in R&D. And the author of the document, I
24 think, should appear on it somewhere. Page 1
25 Robert Mellinger; Francois Colin and Robert

1 Mellinger. They are technical people in
2 research.

3 Q. And if you can you could help me.
4 Where on page 1 is that information you just
5 referred to?

6 A. So at the very bottom of the
7 second page of this document. Just below
8 "conclusion," you can see two names F. Colin,
9 R. Mellinger.

10 Q. Now I see.

11 So this document, Exhibit 1 is a
12 request that is generated based on a problem
13 report from a client to you. Is that right?

14 A. Yes.

15 Q. And do you receive -- let me
16 withdraw that.

17 If you could go to page 3 of
18 Exhibit 1 ending in Bates -172, let me know
19 when you're there.

20 A. Where you see the B-pillar?

21 Q. Yes, the B-pillar, yes.

22 By the way, when I refer to
23 something called a Bates number, I'm referring
24 to a series of alphabet and numbers that are
25 listed at the bottom right of the document.

1 A. Okay.

2 Q. And I'll refer to just the last
3 three digits of that, because it's a really
4 long number, and I'll try to give you the PDF
5 page number as well to help you along.

6 The images on PDF page 3 of
7 Exhibit 1 is a B-pillar that has been received
8 from Magna in this case. Is that right?

9 MR. KATHIR: Objection, the
10 question calls for speculation.

11 So Mr. Kefferstein, if you can
12 answer the question, you still have to
13 answer the question.

14 A. I read the document just like
15 you. It does say "Magna," it does say
16 "B-pillar," but I don't recall this specific
17 document. Once again, I've seen thousands of
18 similar documents.

19 Q. Do you generally receive parts
20 from the customers that you support when they
21 report a problem?

22 A. Yes, and at the relevant time I
23 did receive lots of parts.

24 Q. And would you be -- let me ask
25 that again.

1 And do you relay those parts you
2 received from your customers to the R&D
3 department?

4 A. In most cases, yes.

5 Q. And earlier you mentioned you had
6 some reports, problems from Volkswagen. Is
7 that right?

8 MR. KATHIR: Objection, misstates
9 the prior testimony.

10 THE INTERPRETER: I think he's
11 looking to you for guidance.

12 MR. KATHIR: If you can answer
13 the question, you still have to answer
14 the question.

15 A. I did not earlier say that I had
16 received parts from Volkswagen. I say that I
17 may have visited Volkswagen's premises.

18 Q. And your visit to Volkswagen
19 premises, was that triggered by a report, a
20 problem by Volkswagen?

21 MR. KATHIR: Objection, calls for
22 speculation.

23 A. I don't recall.

24 Q. Understood. So this Exhibit 1
25 was drafted by somebody in the research -- R&D

1 department and not you. Right?

2 A. That is right.

3 Q. And you don't recall this
4 specific document?

5 A. No, I don't, impossible.

6 Q. So before today, you have not
7 reviewed this document. Is that right?

8 A. No.

9 Q. Do you recall seeing this
10 document as part of preparation of the patents
11 at issue in this case?

12 A. We may have quickly reviewed this
13 yesterday among other documents possibly.

14 MR. KATHIR: Objection, vague.

15 Sorry, was your question talking
16 about the filing of the patent or in
17 preparation for today's deposition?

18 MR. LEE: It was in reference to
19 filing the patent.

20 MR. KATHIR: Okay.

21 A. I was talking about my prep
22 session yesterday.

23 Q. Thanks for the clarification.

24 Going back to your role as a
25 product manager in or around 2005-2006 time

1 frame, did you interact with Dominique
2 Spehner?

3 A. Yes, he was my contact at the
4 factory where we managed --

5 THE INTERPRETER: I'm sorry.

6 A. -- manufactured the Usibor 1500
7 coating.

8 Q. Did your work as a product
9 manager involve interactions with Raisa
10 Grigoreva?

11 A. I recall that she was Pascal
12 Drillet's intern, but I had no interactions
13 with her.

14 Q. So I'd like to get to learn a
15 little bit more about your customer-facing
16 role. Could you describe for me generally
17 what your interactions with the customers were
18 like?

19 A. Yes, that was a time when hot
20 stamping was really taking off and expanding
21 rapidly. I would meet with clients and
22 promote our Usibor 1500P and answer any
23 technical questions that they might have.

24 Q. And in answering any technical
25 questions that they might have, that sometimes

1 involved answering problem reports from the
2 clients. Is that right?

3 A. Yes, we did talk about the
4 problems that they were experiencing.

5 Q. And then you're the one who
6 relays those problems to the R&D department.
7 Is that right?

8 A. Yes, to the various R&D teams.

9 Q. And some of your relaying of the
10 problems were to Pascal Drillet at the R&D
11 team. Is that right?

12 A. Yes, that's right, some of them.

13 Q. And is Exhibit 1 a type of
14 analysis report that is generated by the R&D
15 department based on your report of client
16 problems to the R&D department?

17 MR. KATHIR: Objection.

18 I'm sorry.

19 (Continuing interpretation.)

20 MR. KATHIR: Objection, calls for
21 speculation.

22 A. This looks like one of a very
23 large number of expert investigation reports
24 that R&D prepared and produced at the time.

25 Q. And R&D -- let me ask that again.

1 Are expert investigation reports
2 like these stored centrally at ArcelorMittal?

3 MR. KATHIR: Objection.

4 A. I don't know.

5 MR. LEE: Okay. I think we've
6 been going for about an hour. So let's
7 take a short break.

8 THE VIDEOGRAPHER: The time now
9 is 10:00 a.m. This concludes Media 1.
10 Off the record.

11 (Recess taken from 10:00 a.m. to
12 10:14 a.m.)

13 THE VIDEOGRAPHER: The time now
14 is 10:14 a.m. This begins Media 2. On
15 the record.

16 BY MR. LEE:

17 Q. Welcome back.

18 MR. LEE: So I've dropped into
19 the chat box what has been marked as
20 Exhibit 2, which bears the Bates number
21 AM-ITC-0078747.

22 (Exhibit 2, Publication by Ronald
23 Kefferstein beginning Bates Number
24 AM-ITC-0078747, marked for
25 identification, as of this date.)

1 Q. Let me know when you have it
2 open.

3 A. Okay. It's open.

4 Q. Do you recognize the document?

5 A. Yes. It's a publication.

6 Q. And you are the author of this
7 publication. Correct?

8 A. Yes.

9 Q. At the bottom right of Exhibit 2,
10 there is a reference to "La Revue de
11 Metallurgie-ATS-JSI 2004."

12 Do you see that?

13 A. Yes.

14 Q. Is that where this publication
15 was published in?

16 A. Yes, it was a metallurgy review.

17 Q. Is this metallurgy review a
18 well-known journal in the field of metallurgy?

19 MR. KATHIR: Objection, calls for
20 speculation.

21 A. I don't recall whether it was
22 well-known in ferrous metallurgy circles, but
23 I think it was a specialty ferrous metallurgy
24 review.

25 Q. Is this a journal publication

1 that you had regularly reviewed publications
2 from when you were working back in 2004-2007?

3 A. Yes.

4 Q. Have you submitted any other
5 papers to this journal?

6 A. I don't recall.

7 Q. On the upper left corner of
8 Exhibit 2, there's a reference to "Session
9 16."

10 Do you see that?

11 A. Yes.

12 Q. And what does it say below
13 "Session 16"?

14 A. It's written "Steel for the
15 Automotive Industry."

16 Q. And is this in reference to some
17 conference session 16 in regards to that
18 topic?

19 MR. KATHIR: Objection.

20 (Continuing interpretation.)

21 Objection, calls for speculation.

22 A. I no longer recall precisely what
23 that's in reference to.

24 Q. Did you give a conference
25 presentation of the contents of Exhibit 2?

1 A. I don't recall.

2 Q. Have you given many conference
3 presentations, Mr. Kefferstein?

4 A. No, not a lot.

5 Q. About how many?

6 A. Four-five.

7 Q. And you do not recall whether
8 this would -- is one of the presentations that
9 you may have given?

10 MR. KATHIR: Objection, asked and
11 answered.

12 A. No, I don't recall whether there
13 was a verbal presentation of this publication.

14 MR. LEE: I've dropped into the
15 chat box what has been marked Exhibit 3.

16 (Exhibit 3, English translation
17 of Exhibit 2, marked for identification,
18 as of this date.)

19 Q. Please let me know when you have
20 it open.

21 A. Okay.

22 MR. KATHIR: Was this document
23 produced in this investigation?

24 MR. LEE: No, it's not.

25 MR. KATHIR: We object to the use

1 of this document.

2 Q. Would you please go to page 3 of
3 Exhibit 3. Is this the same paper that you
4 saw in Exhibit 2?

5 A. It looks like it.

6 Q. Please take your time if you need
7 to actually compare Exhibit 2 to Exhibit 3.

8 A. I know this is an English
9 language translation of the earlier article
10 that we looked at.

11 Q. And if you go to page one of
12 Exhibit 3, what is the title of page 1 of
13 Exhibit 3?

14 A. "Paris December 9 and 10, 2004,
15 digest of lectures."

16 Q. And if you could please follow me
17 to page 2 of Exhibit 3. Do you see the
18 reference to the International ATS Steelmaking
19 Conference gathering?

20 A. Yes.

21 Q. Do you see that this conference
22 is a gathering every year of about 700 people?

23 MR. KATHIR: Objection, lacks
24 personal knowledge.

25 A. I see what it says on the screen.

1 Q. And based on this document, do
2 you recall whether you had presented what's in
3 Exhibit 2 in this conference?

4 A. No, I really do not recall. It
5 may be that this was a poster, because it was
6 not uncommon at conferences such as this that
7 there be posters.

8 Q. I see. Understood.
9 If you could go back to
10 Exhibit 2, please. Do you see the section
11 where it says "Current Context"?

12 A. Yes.

13 Q. About fifth line from the bottom
14 of the paragraph do you see: "The huge
15 majority of the car manufacturers," and the
16 remaining sentence?

17 A. Yes.

18 Q. Is that in reference to
19 commercial use of hot stamping steel parts
20 back in 2004?

21 MR. KATHIR: Objection --

22 I'm sorry. Go ahead.

23 (Continuing interpretation.)

24 MR. KATHIR: Objection, vague,
25 and calls for speculation.

1 A. It says that in 2004 hot stamping
2 was being developed.

3 Q. And moving down into the next
4 section about the "hot stamping with
5 die-quenching."

6 Do you see that?

7 A. Mm-hmm.

8 Q. The second sentence:

9 "Hot stamping consists in heating
10 blanks until the complete
11 austenitization 900 C to 950 C during 4
12 to 10 minutes."

13 Do you see that?

14 A. Yes.

15 Q. Is that a hot stamping process
16 that you have worked on with the customers?

17 MR. KATHIR: Objection, vague,
18 and calls for speculation.

19 A. That's a very general and vague
20 sentence. That's -- there's no secret in
21 what's being described. That's just very
22 general.

23 Q. So that sentence is a general
24 description of a hot stamping process at the
25 time?

1 A. Yes.

2 Q. And this is -- this was not a
3 secret back then? This was a widespread
4 knowledge. Is that right?

5 MR. KATHIR: Objection, vague.

6 A. That was a process that was
7 well-known regarding coated or uncoated steel,
8 and it's just very general and vague,
9 "900 degrees to 950 degrees Celsius."

10 Q. And moving to the next sentence
11 do you see where it starts with:

12 "The martensitic quenching"?

13 A. Yes.

14 Q. And was martensitic quenching
15 also a well-known process back in 2004?

16 MR. KATHIR: Objection, calls for
17 speculation.

18 A. Frankly, I don't recall. That
19 was over 20 years ago. They're just talking
20 about martensitic quenching. It was a common
21 process.

22 Q. Fair enough.

23 Let's go to the diagram on the
24 upper right of Exhibit 2. Could you describe
25 for me the process that is being illustrated

1 in that diagram?

2 A. It's a diagram that illustrates
3 what we just read previously.

4 Q. And that diagram is a
5 generalization of the hot stamping of
6 precoated steel back in 2004. Is that right?

7 A. Precoated or uncoated. It's a
8 general, very general illustration.

9 Q. Got it.

10 And in the paragraph above the
11 image at the bottom right of Exhibit 2, do you
12 see where it starts with "Usibor 1500P"?

13 THE INTERPRETER: Which
14 paragraph? I'm sorry?

15 MR. LEE: It's the paragraph that
16 starts with "Usibor 1500P" of the image
17 on the bottom right.

18 A. Yes.

19 Q. The image below that paragraph,
20 the left image where it says "before hot
21 stamping"?

22 A. Yes.

23 Q. Is that a cross-section of
24 Usibor 1500P?

25 A. Yes, that's what it says "Alusi

1 coating."

2 Q. And these images are in very low
3 resolution, so I'm going to be referring to
4 the same image that is in Exhibit 3.

5 A. Yes.

6 Q. So on the right of that image
7 where it says "after hot stamping."

8 Do you see that?

9 A. Yes.

10 Q. Is that showing the result of hot
11 stamping Usibor 1500P?

12 A. Yes, it's a generic image that
13 shows it after hot stamping.

14 Q. And what do you mean by "it's a
15 generic image"?

16 A. It must have been an image that
17 we had in our catalogs or in our general
18 presentations to show customers what a layer
19 looked like after hot stamping.

20 Q. I see. So the upper image in
21 that hot stamping column, is that a image of
22 the alloyed coating layer that is formed by
23 hot stamping Usibor 1500P?

24 A. It certainly looks like it, yes.

25 Q. And are there layers in that

1 coating that is visible in that image?

2 A. I see different colors, so yes,
3 you can speak of layers.

4 Q. And how many layers do you see in
5 that image?

6 MR. KATHIR: Objection, calls for
7 speculation and lacks personal knowledge
8 and calls for expert testimony.

9 A. That is true. Typically it would
10 be up to the researchers who prepared the
11 expert investigation reports to identify the
12 layers, because it's complex and depending
13 upon how it was prepared, you might end up
14 saying a lot of stupid stuff.

15 Q. So you're unable to determine
16 whether there are layers in the image we were
17 looking at in Exhibit 3?

18 MR. KATHIR: Objection,
19 mischaracterizes his testimony.

20 A. I haven't seen any images such as
21 this since 2007.

22 Q. So sitting here today looking at
23 this image in front of you in Exhibit 3,
24 you're unable to tell whether there are layers
25 in that image or not?

1 MR. KATHIR: Objection, asked and
2 answered and calls for expert testimony.

3 A. I really can't, I'm sorry. I
4 haven't worked in this field for over 20
5 years.

6 Q. Understood.

7 If you could go to PDF page 2 of
8 Exhibit 2, please. It's the page that ends in
9 bates -748.

10 A. Mm-hmm.

11 Q. Do you see where it says
12 "Metallurgy of Usibor 1500P"?

13 A. Yes.

14 Q. Do you see the table where it
15 says "chemical analysis"?

16 A. Yes.

17 Q. Does that reflect the
18 specification of Usibor 1500P back in 2004?

19 A. I think it's an analysis that we
20 give as an example, but I don't have any
21 recollection as I sit here today what the
22 actual specifications were at that time.

23 Q. Do you recall whether the
24 specification use of Usibor 1500P has changed
25 between 2004 and 2007?

1 A. No, I don't recall that.

2 Q. Do you recall whether the
3 specification of Usibor 1500P has changed
4 since 2007 and currently?

5 A. I really don't know. Once again,
6 since 2007 I have not worked in metallurgy.
7 All I do now is maintenance and public works.

8 Q. Understood.

9 MR. LEE: I have dropped into the
10 chat box what has been marked Exhibit 4,
11 which bears the Bates number
12 AM-ITC-0013127. This is a big document
13 so I think it's taking a minute.

14 (Exhibit 4, Document by Ronald
15 Kefferstein and others beginning Bates
16 Number AM-ITC-0013127, marked for
17 identification, as of this date.)

18 Q. Let me know when you have it
19 open.

20 A. (Document review.)

21 Q. Are you taking your time to read
22 the document, Mr. Kefferstein?

23 A. Yeah, I skimmed through it.

24 Q. Okay. Please take your time. I
25 did want to direct you to PDF page 3, which is

1 the page that ends in Bates -129.

2 Are you an author of this paper?

3 A. Yes, I was an author and
4 contributor.

5 Q. What was your contribution to
6 this paper?

7 A. I was the one who asked our
8 research and development people to do a
9 digital simulation of hot stamping, and my
10 contact in the research team was Dr. Philipp
11 Hein.

12 Q. And when you say "digital
13 simulation," is that in reference to what is
14 shown at PDF page 8, which is Bates -134?

15 A. (Document review.)

16 Page 172? Page document?

17 Q. Yes, it starts at 172 and goes on
18 to 173.

19 A. I don't have any specific
20 recollection other than it was a complicated
21 issue or topic, and it was a topic for an
22 expert, the digital simulation.

23 Q. And this digital simulation is
24 contribution by Dr. Philipp Hein. Is that
25 right?

1 A. Yes, it was his contribution. He
2 was the specialist, and he was the primary
3 author of that section.

4 Q. And what were the contributions
5 of Mr. Dahan?

6 A. If I recall correctly, he was an
7 intern.

8 Q. Do you have any recollection as
9 to whether intern, Mr. Dahan, which section of
10 this paper he has contributed to?

11 A. No, I don't have any recollection
12 whatsoever.

13 Q. If you go to page 2 of Exhibit 4
14 ending in Bates -128. And do you see where it
15 says papers of the "International Conference"
16 on "New Developments in Sheet Metal Forming"?

17 A. Yes.

18 Q. Were you at this conference?

19 A. No, Philipp Hein no doubt
20 attended it.

21 Q. And it would have been Philipp
22 Hein who presented this paper at that
23 conference?

24 MR. KATHIR: Objection, lacks
25 personal knowledge.

1 A. Possibly.

2 Q. Have you been to this
3 International Conference on New Developments
4 in Sheet Metal Forming in any years?

5 A. I attended two or three
6 conferences in Germany, but I don't recall
7 which ones.

8 Q. This International Conference on
9 New Developments in Sheet Metal Forming, was
10 this a well-known conference back in the time?

11 MR. KATHIR: Objection, calls for
12 speculation.

13 A. I don't recall specifically.

14 Q. And I think now I understand what
15 the contribution of Dr. Hein is, which is the
16 numerical simulation.

17 Could you confirm for me one more
18 time what your contribution to this paper was?

19 A. Yeah, if I recall correctly, I
20 must have given him an example of a part that
21 he could simulate, because our researchers
22 didn't have any interaction with our
23 customers.

24 Q. I see. So I'd like to switch
25 gear a little bit and ask you about how you

1 came to the inventions that ended up in the
2 asserted patents.

3 So what were you working on that
4 led to the invention that was eventually filed
5 as the asserted patents?

6 A. My recollections, I guess, are
7 old of events at that time. But what I recall
8 from the 2005 to 2006 period was that hot
9 stamping was fast growing and that we were
10 having problems with some of our customers.

11 Because all the processes were
12 very different from each other, there were
13 instances where the furnaces were very small,
14 others where they were very long. They didn't
15 have the same dwell speed. And we were unable
16 to get parts that were reproduceable.

17 We were trying to understand and
18 define the best process windows to get parts
19 that were reproduceable for properties such as
20 weldability, corrosion, geometry, the
21 fissures, cracks.

22 Q. I see.

23 And you worked with Pascal
24 Drillet in trying to find what the best
25 process windows are?

1 A. Yes.

2 Q. And can you describe how that
3 collaboration worked with Dr. Drillet?

4 A. So I would go see clients and
5 come back with information about the problems
6 that they were encountering. Research and
7 development would investigate the parts and
8 analyze them.

9 And with my colleagues in
10 research and development, we would define what
11 we called experience plans, and we carried out
12 a very large number of lab trials. And we
13 conducted thousands upon thousands of trials
14 on samples.

15 Q. And by "we," is it Dr. Drillet
16 and his team in R&D department?

17 A. Yes.

18 Q. And what happened after
19 Dr. Drillet's team completed those large
20 number of experiments?

21 A. Research and development would
22 draft a summary report, which I would then use
23 to give our customers advice and
24 recommendations or to explain why customers
25 were experiencing certain problems.

1 Q. I see.

2 Do you recall which customers
3 that were involved in that inquiry that
4 resulted in your collaboration with
5 Dr. Drillet?

6 MR. KATHIR: Objection, calls for
7 speculation.

8 A. There were a very large number of
9 them.

10 Q. Large number of customers
11 involved in that process?

12 A. Yes, there were virtually all the
13 manufacturers.

14 Q. I see.

15 And was Dominique Spehner part of
16 that collaboration?

17 (Interpreter clarification.)

18 A. As earlier testified, Dominique
19 Spehner was our contact at the production
20 facility in Mouzon where we manufactured
21 Usibor. And we would ask him for different
22 samples with different thicknesses.

23 Q. And when you say "thicknesses,"
24 are you referring to the thicknesses of the
25 aluminum-silicon coating?

1 A. We're talking about the thickness
2 of either the steel or the coating.

3 Q. I see.

4 And so that I understand
5 correctly, the thicknesses of both the base
6 steel and the aluminum-silicon precoating were
7 varied as part of the experimentation?

8 A. Correct.

9 Q. And was the thicknesses of the
10 aluminum-silicon precoating a important factor
11 in a successful hot stamping process?

12 A. I do recall that that was a very
13 important parameter.

14 Q. And was the thicknesses of the
15 base steel also an important parameter for a
16 successful hot stamping process?

17 A. Yes.

18 Q. So the combination of the
19 thickness of the base steel and the thickness
20 of the aluminum-silicon precoating is an
21 important factor for a successful hot stamping
22 process?

23 A. Yes.

24 Q. And it was Dominique Spehner who
25 provided those combinations of thicknesses.

1 Is that right?

2 A. Correct.

3 Q. And Dr. Drillet's team used those
4 various combinations of the base steel and
5 precoating thicknesses to devise a successful
6 hot stamping process parameter?

7 MR. KATHIR: Objection, misstates
8 his prior testimony and calls for
9 speculation.

10 A. Those were parameters among
11 others.

12 Q. And what are the other parameters
13 you have in mind?

14 A. There were many parameters such
15 as the temperature, the heating time, the
16 heating rate, the cooling speed, the die
17 quenching time, and the atmosphere in the
18 furnace, among others.

19 Q. Yes, that is a lot of parameters.

20 And Dr. Drillet's team varied all
21 those parameters and discovered a specific set
22 of parameters that worked for a successful hot
23 stamping process?

24 MR. KATHIR: Objection, misstates
25 his prior testimony.

1 A. Yes, I think Mr. Drillet did vary
2 on these parameters.

3 Q. And after varying all those
4 parameters and Dr. Drillet found a set of
5 parameters that works, does he provide that
6 information to you?

7 A. Yes, that was the goal of
8 research.

9 Q. And then you take those
10 successful parameters, and you give them to
11 the customers to help solve their problems.
12 Is that right?

13 A. Yes.

14 Q. So Dr. Drillet and Mr. Spehner,
15 they don't interact directly with the
16 customers, they interact with you. Is that
17 right?

18 A. That was the standard process.

19 Q. And do you recall when back in
20 2005 or 2006 that process took place, this
21 experimentation process?

22 A. No.

23 MR. LEE: Okay. I think we've
24 been going for about an hour. Would you
25 like a break?

1 THE WITNESS: Okay.

2 THE VIDEOGRAPHER: The time now
3 is 11:14 a.m. This concludes Media 2.
4 Off the record.

5 (Recess taken from 11:14 a.m. to
6 11:28 a.m.)

7 THE VIDEOGRAPHER: The time now
8 is 11:28 a.m. This begins Media 3. On
9 the record.

10 BY MR. LEE:

11 Q. Welcome back.

12 MR. LEE: I have dropped into the
13 chat box the '602 patent, which is US
14 10,961,602.

15 (Exhibit 5, US Patent Number
16 10,961,602, marked for identification,
17 as of this date.)

18 Q. Let me know when you have it
19 open.

20 A. Okay.

21 Q. Were you involved in drafting any
22 of the figures or specification of the '602
23 patent?

24 A. I did contribute to the drafting
25 of this patent.

1 Q. And by "contribute to the
2 drafting," was that a collaboration with your
3 patent attorney?

4 A. At that time in 2005-2006, I
5 don't remember the exact time, we weren't
6 working with outside lawyers, but Arcelor's
7 patent office and the lawyers in the patent
8 office who were responsible for drafting the
9 patent.

10 Q. I see. As part of that drafting,
11 patent drafting process with your in-house
12 patent lawyers, did you identify any prior art
13 references for them?

14 A. That wasn't my job. That was the
15 patent lawyers' job to identify any prior art
16 references.

17 Q. And once the patent was filed,
18 did anybody ever reach out to you regarding
19 any communications that were received from the
20 patent office?

21 A. I don't have any recollection of
22 any.

23 MR. LEE: I have dropped into the
24 chat box what is marked Exhibit 6, which
25 bears the Bates number AM-ITC-0106957.

1 (Exhibit 6, E-mail from Ronald
2 Kefferstein dated July 31, 2006,
3 beginning Bates Number AM-ITC-0106957,
4 marked for identification, as of this
5 date.)

6 Q. Let me know when you have it
7 open.

8 A. Okay.

9 Q. Do you recognize this document?

10 A. No.

11 Q. Do you see from at the top of
12 page 1 which ends in Bates -957, do you see
13 the "from" field?

14 A. Yes, I do see my name.

15 Q. Does it indicate to you that
16 this -- you are the recipient -- actually let
17 me strike that. Let me ask that again.

18 Does that indicate to you that
19 you're the sender of this document?

20 A. If I know how to read, it does
21 appear to say that it was "from," so it would
22 appear to be an e-mail that I sent.

23 Q. Yes. So this appears to be an
24 e-mail that you sent. Is that right?

25 A. Unless somehow it's been

1 falsified.

2 Q. No, I represent to you that this
3 is a document that was produced by your
4 counsel.

5 So what does "Printed on:
6 Kaplan" refer to?

7 A. If I recall correctly, his name
8 was Dominique Kaplan, and he was one of our
9 contacts in the patent office. So he would
10 have been a predecessor of Jonathan Lobel,
11 but, you know, a old, very old predecessor.

12 Q. So this Mr. Kaplan was a lawyer
13 at Arcelor's in-house legal department?

14 A. Yes, and he was one of the patent
15 managers.

16 Q. And the next field below that, it
17 says "Mail," and it says "Usibor AL."

18 What is that in reference to?

19 A. Oh, that must make reference to
20 aluminized Usibor.

21 Q. And is that the subject line of
22 this e-mail?

23 A. It would appear so.

24 Q. Yes, and I've never used this
25 e-mail platform. So I'm just trying to get a

1 better understanding of what it is we're
2 looking at.

3 And below the bolded line on the
4 right, there appears to be some sort of a date
5 and time marker. Am I understanding that
6 correctly?

7 A. Yes, it would appear so.

8 Q. Can you tell me what date and
9 time, if any, is indicated in that marking?

10 A. The date is July 31, 2006, and if
11 that is the time to the right of the date,
12 then it would be 2:37 p.m.

13 Q. I see. And I'm not asking you to
14 reveal what is in that black box, but could
15 you describe for me what type of document this
16 was that has been sent to Mr. Kaplan?

17 A. I'm sorry I'm unable to do so. I
18 probably sent an extremely large number of
19 e-mails to Mr. Kaplan.

20 Q. Fair enough.

21 If you could go to PDF page 3
22 ending in page -959. Do you see where it
23 says:

24 "Received from HD.Kaplan"?

25 A. Yes.

1 Q. Does that reflect that you have
2 received a response from Mr. Kaplan to the
3 e-mail that you sent originally that was at
4 the beginning of this document?

5 A. My reading of it based on the
6 date here is that I received an e-mail from
7 Mr. Kaplan on the 24th of July and responded
8 to him with the e-mail on the first page on
9 July 31.

10 Q. Yes, that would make sense.
11 Thank you.

12 And at the bottom of that page,
13 PDF page 3, could you help me understand what
14 that information is?

15 A. Where?

16 Q. I'm referring to the information
17 between the two dotted lines where it says "04
18 sent to."

19 I'm just trying to understand
20 what that information that is conveying.

21 A. Clearly on July 24 Mr. Kaplan
22 sent an e-mail to Mr. Drillet and to myself.
23 And I responded on July 31 to Mr. Kaplan and
24 Mr. Drillet.

25 Q. I see. So that's a summary of

1 the dates and the recipients of the two
2 e-mails that we saw?

3 A. That's the previous system that
4 we used that was called Memowin that provided
5 summary information in this format.

6 (Stenographer clarification.)

7 Q. Thank you. You can put that
8 document away. If you could please go back to
9 Exhibit 5, which is the '602 patent.

10 Can you identify for me any
11 specific portion of this document that you
12 drafted?

13 A. No, I'm unable to do so. First
14 of all, that was over 20 years ago, and
15 typically the process was we would draft
16 information in French, submit it to the patent
17 office that would have it translated, and it
18 was teamwork.

19 Q. And before today, have you seen
20 Exhibit 5?

21 MR. KATHIR: Objection.

22 Can you instruct the witness not
23 to reveal any attorney-client privileged
24 information.

25 So you can answer the dates as to

1 when you saw the document, but leave it
2 at that.

3 THE WITNESS: Okay.

4 A. Jonathan Lobel sent me this
5 document or a document that looked like this,
6 and I reviewed it during my flight up and at
7 the office here yesterday. And that was the
8 first time since 2007 that I saw this
9 document.

10 MR. LEE: And I have dropped into
11 the chat box an Exhibit 7, which is the
12 US Patent 11,326,227.

13 (Exhibit 7, US Patent Number
14 11,326,227, marked for identification,
15 as of this date.)

16 Q. Before today, when was the last
17 time you saw this document?

18 A. This isn't the same document as
19 in Exhibit 6?

20 Q. It is a different issued patent
21 which ends in '227.

22 A. (Document review.)

23 They -- it looks like the patent
24 in Exhibit 6. I must have seen it yesterday.

25 Q. Did you review the claims of

1 Exhibit 5, the '602 patent?

2 A. I skimmed through them really
3 quickly.

4 Q. If you could please go to PDF
5 page 15.

6 A. Document Number 5?

7 Q. Yes, Exhibit 5, please.

8 A. Page?

9 Q. Page 15, which has the Column
10 Number 14. And if you go toward the bottom of
11 that page at Column 14, line 59, do you see
12 where it says:

13 "1, a precoated steel product"?

14 A. (Document review.)

15 Mm-hmm.

16 Q. Before I go on further,
17 Mr. Kefferstein, are you able to read English?

18 A. Yes.

19 Q. And could you please take a
20 moment to read claim 1 which starts at that
21 page and goes into the next page ending at
22 Column 15, line Number 16.

23 And if you need any assistance in
24 reading this, then please ask our interpreter
25 for any assistance you need.

1 A. (Document review.)

2 Yes, it does bring back memories.

3 Q. Does that look like your
4 invention?

5 A. That's one aspect of the
6 invention.

7 Q. And by that, what are the other
8 aspects of your invention?

9 A. I don't have the entire patent in
10 my head obviously, but this is a macroscopic
11 aspect of the coating after thermal treatment,
12 but the patent, I'm sure, somewhere also
13 describes how to produce this result.

14 Q. I see.

15 In preparing for today's
16 deposition, did you speak with any of the
17 other inventors of the patents?

18 A. I bumped into Pascal Drillet here
19 yesterday, and that was the first time that I
20 had seen him since 2007.

21 Q. Did you speak with any other
22 employees at AM, ArcelorMittal, in preparation
23 for this deposition who are not your lawyers?

24 A. No.

25 Q. And when you bumped into Pascal

1 Drillet yesterday, did you speak with him
2 about his deposition?

3 A. Very little. I just asked him
4 during breaks how it was going.

5 Q. So you did not speak to him about
6 the patent itself?

7 A. No.

8 Q. And other than the Exhibit 5,
9 which is a '602 patent and Exhibit 7, that is
10 a '227 patent, did you prepare -- did you
11 review any other documents in preparation for
12 this deposition?

13 A. Yesterday I reviewed one, two,
14 three documents that were the presentations or
15 publications that we looked at this morning.

16 Q. Were you asked to search for any
17 documents in relation to this litigation?

18 A. Two weeks ago when I was first
19 told about this case, I was asked to look for
20 records, which I did. I don't still maintain
21 many of my records from 20 years ago, but I
22 did identify a CD-ROM and a hard drive which I
23 turned over to the lawyers yesterday.

24 Q. And were the CD-ROM and hard
25 drive in relation to the work you did back in

1 2005 to 2007?

2 A. They related to my work during
3 that period.

4 Q. And did you review the contents
5 of those CD-ROM and hard drive?

6 A. I didn't have time and I no
7 longer have a CD-ROM drive on my computer.

8 Q. Fair enough. So you did not
9 review the contents, but you know that those
10 CD-ROM and hard drive pertain to your work in
11 that time period of 2005 to 2007?

12 A. Yes.

13 Q. And there were no other requests
14 to search for documents before two weeks ago
15 when your lawyers had reached out to you. Is
16 that right?

17 A. No, I did not receive any
18 requests prior to the kind request that was
19 made to me two weeks ago to be deposed.

20 (Continued on the next page.)

21

22

23

24

25

1 MR. LEE: That was all my
2 questions. Thank you so much for your
3 time today, Mr. Kefferstein. No further
4 questions.

5 THE WITNESS: Thank you.

6 MR. KATHIR: Nothing from me. We
7 can go off the record.

8 THE VIDEOGRAPHER: The time now
9 is 12:01 p.m. This concludes Media 3 of
10 3 of today's deposition. Off the
11 record.

12 (Time noted: 12:01 p.m.)

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A C K N O W L E D G M E N T

STATE OF)
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I, RONALD KEFFERSTEIN, hereby
swear that I have read the within
transcript of my testimony on
November 15, 2024; that the transcript
is a true, complete, and correct record
of my testimony, and that the answers on
the record as given by me are true and
correct.

RONALD KEFFERSTEIN

Signed and subscribed to
before me this _____
day of _____, 2024.

Notary Public

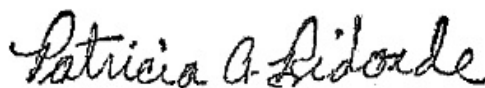
C E R T I F I C A T E

I, PATRICIA A. BIDONDE,
Stenographer, Registered Professional
Reporter, do hereby certify:

That the transcript of the
proceedings on November 15, 2024,
wherein questions were asked to and
answers were given by RONALD KEFFERSTEIN
is hereinbefore set forth, and that such
transcript is a true, complete, and
correct record.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I
am in no way interested in the outcome
of this matter.

IN WITNESS WHEREOF, I have
hereunto set my hand this day,
December 3, 2024.



PATRICIA A. BIDONDE
STENOGRAPHER
REGISTERED PROFESSIONAL REPORTER

Page 60 of 75

Ex. 2010
IPR2024-01376

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Exhibit 1	Expert investigation			
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Exhibit 2	Publication by Ronald			
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Exhibit 3	English translation of			
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Exhibit 4	Document by Ronald			
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Exhibit 5	US Patent Number			
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Exhibit 6	E-mail from Ronald			
	Kefferstein dated July			
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Exhibit 7	US Patent Number	
	11,326,227.....	53 13

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E R R A T A

INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

E R R A T A

ERRATA SHEET FOR THE TRANSCRIPT OF:

Case Name: In Re: Certain High-Strength Aluminum

Dep Date: November 15, 2024

Deponent: Ronald Kefferstein

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