

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

-000-

SKECHERS U.S.A., INC.,)
)
Petitioner,)
) Case: IPR2025-00141
v.)
)
NIKE, INC.,)
)
Patent Owner.)
-----)

REMOTE VIDEO-RECORDED DEPOSITION OF
SABIT ADANUR, PH.D.

Taken via Zoom
On Tuesday, December 16, 2025
At 8:30 a.m.

Skechers U.S.A. v. Nike, Inc.
IPR2025-00141
Patent No. 8,266,749
Ex. 2010

Reported by: Emily A. Gibb, RPR, CSR, CCR
CA CSR #14551, NV CCR #709

1 A P P E A R A N C E S

2 For the Petitioner:

3 Jonathan M. Lindsay, Esq.
4 IRELL & MANELLA LLP
840 Newport Center Drive
Suite 400
5 Newport Beach, California 92660
(949) 760-5220
6 jlindsay@irell.com
7

8 For Nike:

9 Michael J. Sebba, Esq.
Aaron Bowling, Esq. (Chicago Office)
ARNOLD & PORTER
10 777 South Figueroa Street
44th Floor
11 Los Angeles, California 90017
(213) 243-4000
12 michael.sebba@arnoldporter.com
13

14 Also Present:

15 Theresa Majers

* * *

16
17
18
19
20
21
22
23
24
25

I N D E X

	PAGE
SABIT ADANUR, PH.D.	
Examination By Mr. Sebba	5
Examination By Mr. Lindsay	142

* * *

E X H I B I T S

EXHIBIT	DESCRIPTION	PAGE
Exhibit 1014	- Petition for Inter Partes Review Under 35 U.S.C. 311-319 and 37 C.F.R. 42.100 ET SEQ.	50
Exhibit 1020	- United States Patent 7,051,460 B2	51
Exhibit 1050	- Knitting Technology - A Comprehensive Handbook and Practical Guide - Third Edition - David J. Spencer	74
Exhibit 1022	- United States Patent 5,345,638	78
Exhibit 1023	- German Reich Patent Document No. 627 878	115

** Many exhibits were discussed and placed in Exhibit Share but not officially marked for the record.

P R O C E E D I N G S

-000-

VIDEOGRAPHER: Good morning. We are on the video record at 8:30 a.m. on December 16, 2025. Please note that is deposition is being conducted virtually. Quality of recording depends on the quality of camera and Internet connection of participants. What is seen and heard from the witness is what will be recorded. Audio and video recordings will continue to take place unless all parties agree to go off the record.

This is Media No. 1 of the video-recorded deposition of Dr. Sabit Adanur in the matter of Skechers U.S.A., Inc. versus Nike, Inc., Case No. IPR2025-00141.

My name is Theresa Majers representing Veritext, and I'm the videographer. I am not authorized to administer an oath. I am not related to any party in this action, nor am I financially interested in the outcome.

If there are any objections, please state them at the time of your appearance. Counsel, please state your appearance and affiliations for the record, beginning with the noticing attorney.

1 MR. SEBBA: This is Michael Sebba from
2 Arnold & Porter. I'm here representing Nike.

3 MR. LINDSAY: And this is Jonathan Lindsay
4 from Irell & Manella representing Skechers here to
5 defend the witness, Dr. Adanur.

6 VIDEOGRAPHER: And will the court reporter
7 please introduce yourself and then swear in the
8 witness.

9 THE COURT REPORTER: Good morning. We are
10 on the record. My name is Emily Gibb. I am a
11 California Certified Stenographic Court Reporter, CSR
12 License No. 14551.

13 Dr. Adanur, please raise your right hand.

14
15 Thereupon --

16 Sabit Adanur,
17 was called as a witness, and having been first duly
18 sworn to tell the truth, the whole truth, and nothing
19 but the truth, testified as follows:

20
21 EXAMINATION

22 BY MR. SEBBA:

23 Q. Good morning, Dr. Adanur. Thank you for
24 being here today.

25 A. Good morning.

1 Q. Can we -- can you please state your full
2 name.

3 A. Sabit Adanur, S-a-b-i-t A-d-a-n-u-r.

4 Q. Thank you.

5 And have you been deposed before,
6 Dr. Adanur?

7 A. Yes.

8 Q. Approximately how many times?

9 A. Several times.

10 Q. More or -- would you say it's more than ten
11 times?

12 A. Around ten.

13 Q. Around ten. Okay.

14 So it sounds like you've been through this
15 before, but I'm still going to run through a few
16 rules for today. So, of course, I'm going to be
17 asking you questions, and as you know, there's a
18 court reporter writing everything down. So please
19 keep your answers verbal, no head nods, no head
20 shakes, so she can keep a clean record.

21 Do you understand that?

22 A. Yes.

23 Q. Similarly, for purposes of a clean record,
24 let's try not to speak over each other. Wait until
25 I've completed my question before you start answering

1 it.

2 Do you understand that?

3 A. Yes.

4 Q. If I -- if you don't understand a question
5 of mine, please let me know, and I'd be happy to
6 clarify it. But if you answer one of my questions,
7 I'm going to assume you understand it.

8 Does that make sense?

9 A. Yes.

10 Q. And also, if you'd like to take a break at
11 any point, please just let me know. I'd only ask
12 that you answer any pending question, and then once
13 you've answered that, we'll be able to take a break.

14 Do you understand that?

15 A. Yes.

16 Q. Okay. So, Dr. Adanur, let's start with
17 your -- oh, excuse me.

18 Before that, do you have any documents in
19 front of you?

20 A. No.

21 Q. Okay. Do you have the -- the documents from
22 this IPR in front of you?

23 A. No.

24 Q. Do you have them on your computer?

25 A. Yes.

1 Q. Understood.

2 Okay. So let's start by just talking a bit
3 about your background. If we look at Exhibit 1002 in
4 this proceeding. Let me know when you have that in
5 front of you.

6 A. Yes, I do.

7 Q. Okay. Do you recognize this document?

8 A. Yes.

9 Q. Okay. And what is it?

10 A. That's my declaration for this case.

11 Q. Okay. And if we go back to page -- sorry,
12 my computer is -- needs a moment. There we go.

13 And if we go to Appendix A of your
14 declaration, Exhibit 1002, which is page 149 of the
15 PDF, let me know when you're there.

16 A. Yes.

17 Q. And -- sorry, just so the record's clear, if
18 I refer to your declaration, will you understand that
19 I'm referring to Exhibit 1002?

20 A. Yes.

21 Q. So what is Appendix A of your declaration?

22 A. That's my CV.

23 Q. Okay. So can you tell me about your
24 educational background?

25 A. I have an undergraduate degree in mechanical

1 engineering from Istanbul Technical University in
2 Istanbul. And then I came to the United States, and
3 I got my master of science degree in textile
4 engineering and science from North Carolina State
5 University. And then I got my -- a Ph.D. degree from
6 fiber and polymer science in -- again, from North
7 Carolina State University in Raleigh, North Carolina.

8 Q. And what -- and after graduating -- excuse
9 me.

10 After obtaining your Ph.D., what did you do
11 professionally?

12 A. After I got my Ph.D., I work in a company in
13 Wisconsin for three years and then came to Auburn
14 University.

15 Q. And that company in Wisconsin, was that
16 Asten Forming Fabrics?

17 A. Yes.

18 Q. And what did you do at Asten Forming
19 Fabrics?

20 A. At Asten Forming Fabrics, the first four
21 months, I worked as process development engineer to
22 develop processes to make forming fabrics for paper
23 machines, for paper industry. And after that, I
24 became the -- the product and process development
25 manager. And then we were developing -- designing

1 and developing fabrics called forming fabrics from
2 the formation of the paper on the paper machine to --
3 to sell the paper industry.

4 Q. Okay. So when you say "forming fabrics,"
5 what are those?

6 A. Okay. That is a part of the papermaking
7 process. Paper is made on a paper machine, and that
8 machine is -- is a beautiful machine. It is
9 approximately 10-meter wide, and it can be as long as
10 a football field. So it has three sections to make
11 the paper.

12 The first section is called forming section
13 to form the paper. Paper starts with wood, trees,
14 and then trees are cut and then processed in the pulp
15 mill, which is different than the -- different than
16 the paper mill.

17 So in the pulp mill, it's a long process,
18 but basically what they do is that separate
19 individual wood fibers from each other. They remove
20 the lignin, which is the glue that is holding those
21 fibers together, wood fibers. And wood fiber is just
22 like a cotton fiber, approximately 1-inch long,
23 cellulosic fiber. So once those individual fibers
24 are obtained, separated from each other, they are
25 mixed with water. And the ratio is 99 percent water,

1 1 percent wood fiber. And they are mixed together.
2 So we need lots of water to make the paper. That's
3 why all the paper mills are next to rivers or lakes
4 or water.

5 So once they are mixed, wood fibers and
6 water is mixed at that ratio, then it is pumped onto
7 the paper machine. And on the paper machine, in
8 those three different sections, there are different
9 fabrics that are used to support -- to form and
10 support the paper.

11 So those fabrics in the forming section,
12 they are called forming fabrics, again, because all
13 the formation of the paper. So they are like
14 filters, but very strong fabrics, highly engineered
15 fabrics, so -- and they rotate continuously like a
16 belt, 10-meter wide, you know, 50-, 60-meter long,
17 even longer depending on the size of the machine.
18 They continuously rotate at very high speed.

19 And then also in the press section, there
20 are press fabrics, different than forming fabrics.
21 They also continuously rotate. There are at least
22 three of them in the press section.

23 And then in the dryer section, there are
24 dryer fabrics. Again, there are several of them.
25 They rotate continuously.

1 So once the paper starts at the beginning of
2 the paper machine with the slurry, which is the
3 mixture of wood fibers and water is pumped onto the
4 forming fabric, the water drains through the fabric,
5 through the opening of the fabric, and the wood
6 fibers accumulate on top of the fabric, which is
7 rotating at 2,000 feet per minute.

8 And then -- so the sheet is formed in the
9 forming section.

10 Then the sheet is transferred to the press
11 section, but at the end of the forming section, the
12 ratio -- the -- the paper is still very wet. The
13 ratio is 20 percent wood fiber, 80 percent water.
14 Still you cannot lift the paper. It doesn't have any
15 strength.

16 So from there, it goes through a press
17 section. And in the press section, as the name
18 indicates, the paper's web. And -- paper web, and
19 then press fabrics. Paper web runs on the -- I guess
20 the press fabrics, and they are squeezed against the
21 rolls under high pressure to remove more water from
22 the paper web. So at the end of the press section,
23 then approximately the ratio is 40 percent wood fiber
24 and 60 percent still water.

25 And then that -- the paper goes to the

1 drying section. In the drying section, this is a
2 closed area, heated steam is used to dry the paper to
3 remove the rest of the water from the -- from the
4 paper. Against the heated cylinders, again, the
5 paper rounds with the fabric against those cylinders
6 and then water is evaporated. And at the end of the
7 machine, then the ratio of the wood fibers is 5 --
8 95 percent wood fiber and 5 percent water. So that
9 is a typical ratio of the -- of the paper that we use
10 every day. So that is -- in summary, it's a
11 beautiful, long process, but that is the summary of
12 the process.

13 So we were making -- in Appleton, Wisconsin,
14 we were making fabrics for the forming section, for
15 the first section of the -- of the machine. And
16 that's why, again, they are called forming fabrics.
17 And it's -- the -- the forming fabrics are the most
18 important fabrics of the machine --

19 (Aaron Bowling enters the deposition.)

20 THE WITNESS: -- because if you make the
21 paper wrong in -- during the formation, then you
22 cannot correct it later. So it is very sens- --
23 sensitive to the fabric.

24 So we use -- we -- we -- we have -- if we're
25 making different fabrics, different designs for

1 different paper types such as newsprint, tissue,
2 brown paper, et cetera. For each paper type, there's
3 a different fabric that is used with the different
4 characteristics, you know --

5 (Clarification by the Reporter.)

6 THE WITNESS: Different characteristics such
7 as -- such as air permeability, drainage, surface
8 roughness, et cetera, and there are other properties
9 as well. So we were making and selling those
10 fabrics.

11 And those fabrics are extremely expensive.
12 You know, typical paper machine is around 400,
13 \$500 million. And at any time, at any given time,
14 the cost of those fabrics, all those fabrics on the
15 machine can be, you know, a couple of million dollars
16 or more. You know, I worked there many years ago, so
17 I don't know the current -- current prices, but very
18 expensive fabrics, extremely critical for
19 papermaking.

20 Basically, you know, without that paper
21 machine, you can make paper in your kitchen with a
22 blender and then, you know, recycled papers. And if
23 you have a filter, you can just drain the water and
24 then let it dry outside. And, in fact, there was a
25 technician in our company that he was producing his

1 own paper at home, tissue, towel type of stuff.

2 But -- so you can make -- theoretically you
3 can make paper without the machine, but you cannot
4 make paper without those fabrics, even if you had
5 that machine.

6 BY MR. SEBBA:

7 Q. Okay. Thank you.

8 A. You're welcome.

9 Q. So than after Asten Forming Fabrics, you
10 went -- you became a professor at Auburn University;
11 is that right?

12 A. That's right.

13 Q. And what have -- what type of research have
14 you done at Auburn?

15 A. At Auburn University, when I came, there was
16 textile engineering department, so I came to textile
17 engineering department, started as assistant
18 professor. And then I -- I did so much research, and
19 they are listed in my -- in my CV, in -- in fiber --
20 related to fibers, yarns, fabrics, their
21 applications, their properties, testing --
22 manufacturing, testing. We had beautiful labs. We
23 had all kinds of textile machinery in those labs that
24 we used to use for research as well as teaching for
25 the students.

1 And actually, the -- the textile building is
2 one of the historical buildings at Auburn University
3 that cannot be, you know, torn down because it is
4 historical building, one of the four buildings -- one
5 of the four I believe. And so it was built as a
6 textile mill a hundred years ago also. It was built
7 as a textile mill, so we had all kinds of equipment
8 to make a fabric -- to make fabrics from -- you know,
9 from the polymers, from the fibers all the way to the
10 fabric with the yarn spinning, extrusion yarn
11 spinning, fabric formation, weaving, knitting. We
12 had several knitting machines, warp knitting, weft
13 knitting machines.

14 And then we did decline -- or the textile
15 industry in the U.S., they decided to switch to fiber
16 and polymer engineering, not only textiles, but fiber
17 and polymer. So we included fibers as well, although
18 we had extruded before, we -- we started teaching
19 polymer courses. And then around 2015, they decided
20 to merge that department with other departments, so I
21 went back to mechanical engineering.

22 But I still teach courses from -- from my
23 old department, and they are also listed in my -- in
24 my declaration and in my CV.

25 So I teach one course about -- Mechanical

1 5320 and 6320, both undergrad and graduate course,
2 about engineered flexible structures, such as fibers,
3 yarns, fabrics. And I also teach another course,
4 6320 -- 50- -- 5520, 6520, and it is manufacturing of
5 polymeric structures.

6 And that covers everything from fibers
7 extrusion all the way to manufacturing processes of
8 plastics parts, plastic products.

9 Q. Okay. Thank you. That's helpful.

10 Have you ever -- in your work at Auburn
11 University ever developed a -- any footwear?

12 A. We developed several fabrics. We produced
13 several fabrics, and that includes knitting --
14 knitted fabrics. As I said, we had weft knitting
15 machines and warp knitting machines, and so we
16 produced those kind of fabrics for the students. But
17 I don't recall that we made any shoe from those
18 fabrics.

19 Q. Okay. And have you ever worked on footwear
20 in any other projects outside of Auburn University?

21 A. Yes. I consulted for a few companies
22 related to footwear, athletic shoes.

23 Q. What companies were those?

24 A. Well, I did some work for a -- for a -- a
25 low -- for a law company in Atlanta related to Adidas

1 shoes. And also I did some work for another lawyer
2 related to use of Kevlar and other fabrics in shoes,
3 athletic shoes.

4 There might be more, but those are the two
5 that I remember right now.

6 Q. Okay. I'm sorry. You said "a law company
7 in Atlanta"; is that right?

8 A. Yes, yes.

9 Q. Okay. So both of those projects, were those
10 work -- work as an expert witness?

11 A. The first one I was not designated as expert
12 witness, but I helped the company related to the
13 case.

14 And the other one was not a patent case. It
15 was a product case, and I believe I was expert
16 witness. I don't -- I don't remember the title, but
17 I analyzed the fabric -- shoes -- shoes. He sent me
18 shoes. I analyzed the shoes, fabrics, and then wrote
19 a report.

20 Q. Okay. So for both of these -- let's take
21 them one at a time. Excuse me.

22 So when you were working with the law
23 company in Atlanta related to Adidas, you were
24 providing -- were you providing an analysis of a
25 patent? Let's start there.

1 A. No, not a patent. I was providing
2 information about how those shoe fabrics were made in
3 the industry, which machines they were using, which
4 computer programs, software they were using. Because
5 I know the textile industry, so they are trying to
6 find, you know, how those fabrics were produced in
7 the industry.

8 Q. Okay. So when you were working with the law
9 firm in Atlanta, did you develop any footwear?

10 A. No.

11 Q. And do you remember the name of the law
12 firm?

13 A. Kilpatrick Townsend Stockton. I think they
14 changed name at one time, so Kilpatrick --

15 Q. Law firms have a tendency -- oh, sorry.

16 A. Sorry. Yeah, Kilpatrick Townsend &
17 Stockton.

18 Q. Thank you.

19 And you said that was in relation to Adidas;
20 is that right?

21 A. That was my understanding.

22 Q. Do you know what the dispute -- or was
23 Adidas in a dispute with another company that this
24 was related to?

25 A. I believe it was with Nike.

1 Q. Okay. And then the second project which I
2 believe you said was about products liability; is
3 that right?

4 A. Yes.

5 Q. Okay. Do you know what law firm you were
6 working with on that project?

7 A. It was another lawyer from the same -- same
8 law firm.

9 Q. From Kilpatrick Townsend?

10 A. Yes. That's --

11 Q. Okay.

12 A. -- what I remember, yes.

13 Q. Okay. And did you develop any footwear as a
14 part of that project?

15 A. No. He sent me shoes, athletic shoes, and I
16 analyzed them.

17 Q. So have you -- have you ever developed any
18 footwear?

19 A. Not that I recall.

20 Q. Do you recall when Skechers first contacted
21 you about this case?

22 A. I believe it was approximately two years
23 ago.

24 Q. And so you prepared your declaration; is
25 that correct?

1 A. That's right.

2 Q. What was the process by which you prepared
3 your declaration?

4 A. Well, we had several conversations,
5 meetings, we discussed, and then we started -- I
6 started writing down my thoughts. And then we
7 exchanged ideas and discussed the -- the progress and
8 then prepared my report.

9 Q. Did you identify the prior art in your --
10 the alleged prior art in your declaration?

11 A. I believe most of -- most of them, I did.

12 Q. So this IPR concerns U.S. Patent 8,266,749;
13 is that right?

14 A. That's right.

15 Q. If I refer to that as the '749 patent, will
16 you know what I'm referring to?

17 A. Yes.

18 Q. Okay. When did you first see the '749
19 patent?

20 A. Again, I believe it was towards the end of
21 2023. Around that time.

22 Q. Okay. So that Adidas case that you worked
23 on with Kilpatrick, did that also involve the '749
24 patent?

25 A. I was not involved with the patents in that

1 case.

2 Q. Well, what did you do instead?

3 A. Well, I -- I told you. They asked me to
4 look into the industry and how they produce those
5 shoe fabrics in the industry, which machines are
6 being used, what kind of fibers, yarns they use, and
7 what kind of fabrics they produced, what kind of
8 design, and what kind of computer programs they used,
9 especially the machine that since I'm a mechanical
10 engineer as well, as well as a textile engineer. So
11 I looked into the machinery part of it -- part of
12 that manufacturing process.

13 Q. Did you review any prior art as part -- as
14 part of your work in that case?

15 A. I don't recall that, but of course I looked
16 at the documents about the machines and processes,
17 and I called many companies, and I talked to them on
18 the phones. But I don't recall that I read any
19 patent because that was not my -- my task.

20 Q. Okay. Did you prepare a report for that
21 case?

22 A. I communicated with the lawyers. I sent
23 documents and then maybe short reports as well.

24 Q. When you say you "sent documents," what did
25 you send?

1 A. Well, I don't know if I can talk about that
2 case in more detail.

3 Q. Why would you not be able to?

4 A. Well, that -- that's a -- I think it was a
5 litigation case, and so I don't think that I have the
6 freedom to talk about the details of that case.

7 Q. Okay. Do you still have the materials you
8 worked on from that case?

9 A. No.

10 Q. Did you talk with any other experts as part
11 of that case?

12 A. Other than lawyers, I didn't talk to
13 anybody.

14 Q. What fabrics did you review as part of that
15 case?

16 A. Well, those are the fabrics that -- that
17 were produced in those machines, you know, weft
18 knitting and warp knitting machines. So those
19 general fabrics that -- that were used in shoemaking.

20 Q. Were they fabrics in specific articles of
21 footwear?

22 A. That's what -- you know, that was the case
23 about, and I was -- I was determining the types of
24 machines that were used.

25 Q. Do you recall if it was Adidas footwear that

1 you were looking at?

2 A. Well, again, I was concentrating on the
3 machine side of it, so textile machinery that is used
4 to make shoes, shoe fabrics. And that included weft
5 knitting machines, warp knitting machines, so on
6 the -- on the machinery side and -- and the programs,
7 the computer programs that they were using.

8 Q. Okay. So if you looked at the machines -- I
9 guess, whose machines were you looking at?

10 MR. LINDSAY: You know, I'm going to have to
11 object here.

12 Dr. Adanur, you may have -- may have
13 obligations to your client in -- in that other case,
14 and this is starting to feel like a deposition of
15 that case and what you were doing. I would just
16 remind you of any obligations you might have to
17 another party not to divulge attorney-client
18 privileged information or otherwise confidential
19 information.

20 THE WITNESS: Okay. Thank you.

21 Yes. Well, again, the machines that are
22 used to make those fabrics are the machines that are
23 involved in this case too. So really, they are the
24 same machines that are used by different
25 manufacturers, so same machines as in this case.

1 BY MR. SEBBA:

2 Q. And what are those machines?

3 A. Again, weft knitting machines, circular weft
4 knitting machines, or flat weft knitting machines,
5 and then warp knitting machines.

6 Q. Any specific -- were there any -- or are
7 there any specific weft knitting machines that you're
8 referring to?

9 A. Well, again, these are, you know, general
10 stuff that I teach my students too. So weft knitting
11 machines can be circular, and the circular machines
12 can be narrow or wide circular machines or they can
13 be flat weft knitting machines. So I teach those in
14 my classes too.

15 And -- and also warp knitting machines,
16 there are two types, tricot and Raschel. And all of
17 those -- any of those machines can be used -- could
18 be used in shoe fabric manufacturing.

19 I just taught that -- that class. The
20 semester just ended last week. The finals ended last
21 week, so I -- I taught those subjects to the -- to
22 the students.

23 Q. So were you discussing those machines
24 generally or was there -- like, did you visit a
25 place -- a plant or -- a manufacturing facility and

1 discuss the specific machines in that facility?

2 A. Well, I'm sorry about that. I think it is
3 getting into -- to details of the case, and I don't
4 think that I can answer that question.

5 Q. Okay. You're saying that you think that
6 information's confidential?

7 A. I believe so.

8 Q. Okay. In preparing your declaration, what
9 materials did you review?

10 A. Well, first of all, I relied on my
11 background as -- you know, as you know, I have a
12 wide, broad background starting in mechanical
13 engineering, textile engineering, and polymer
14 science. And I've -- I have done lots of research
15 and published in journals many -- many publications.
16 I supervised many graduated student, master's and
17 Ph.D. I -- I also supervised senior design projects.
18 More than 70, I believe.

19 And then -- so I did lots of research, and
20 they are also listed in my CV. So I rely -- rely on
21 my background first.

22 And then, of course, I have been following
23 the textile machinery industry over the years,
24 starting with the ATMA international show in
25 Greenville, South Carolina. That is American Textile

1 Machinery Association.

2 And I believe I went -- the first one I went
3 to was in 1983, I believe. It is repeated every four
4 years. It was repeated every four years until 10, 15
5 years ago, which they stopped having those shows. So
6 every four years, I used to attend those shows in
7 Greenville, South Carolina.

8 In fact, at one time, one year, I took my
9 class, and we stayed in -- stayed a couple of days in
10 Greenville and then went to the show.

11 And then there is ITMA in Europe,
12 International Textile Machinery Association. So I
13 used to go to those. I went to several of them.
14 Again, that is also held every four years,
15 alternating with ATMA in Greenville. So I went to
16 those in 1995, Milan. That was the first one, I
17 think. And then later, in Birmingham -- in Paris in
18 '99; in Birmingham England 2003; and then Munich,
19 Germany, 2007, I believe.

20 And then also, there are -- whenever I visit
21 Turkey, also -- Turkey also has a textile machinery
22 show, ITM. So I attended a few of those shows as
23 well. And the last one was this past summer, and
24 the -- the other one was two -- two years before
25 that.

1 So -- and being a mechanical engineer for --
2 I like machinery, so I observe those machines, what
3 kind of new products they are producing. And then I
4 looked at the -- I -- I collect lots of brochures,
5 documentations from those companies, and they are
6 listed in my -- in my declaration as exhibits. Some
7 of them are listed. So I rely on those.

8 And I also -- I also talk to people, of
9 course, the engineers, the mechanics at -- at those
10 shows. And also, I know the subject since I've been
11 teaching that for more than 30 years now.

12 Q. Okay. That's helpful, but that wasn't quite
13 what I asked.

14 My -- I -- my question was specifically:
15 When preparing your declaration, what did you review?

16 A. Well, those are listed as exhibits. I mean,
17 if you ask me a specific exhibit, I can talk about
18 it, but they are all listed there.

19 Q. Sure. Let me -- let me phrase that a
20 different way.

21 Did you review any documents that aren't
22 exhibits to your declaration?

23 A. Well, the patents are there. I reviewed
24 those patents.

25 Other than that, just the documents, not --

1 just the documents that -- that were sent to me, and
2 then they are all listed there. I -- I didn't review
3 anything -- anything else. I don't recall.

4 Q. Okay. So you -- let's step back.

5 I believe you said you identified the prior
6 art in your declaration, but then you just said that
7 the documents were sent to you.

8 So was it identified by someone other than
9 you or --

10 A. No, I -- I didn't say that I identified the
11 documents. I said I identified most of the documents
12 probably. And those are -- I can tell you which
13 one -- you know, I identified. So I -- I didn't -- I
14 didn't identify all of them. But, you know, probably
15 most of them I identified, and they are -- they are
16 listed there.

17 Q. Okay. Were any documents sent to you that
18 you didn't discuss in your declaration?

19 A. Yeah. I mean, there is, for example,
20 declaration from, I guess, a lady, Ingrid. I don't
21 believe that I discussed that in my -- in my -- I --
22 I don't think that I discussed -- I think it is a
23 she -- her declaration in my declaration.

24 Q. Okay. Did you review any prior art or
25 alleged prior art that is not in your declaration?

1 A. No. Everything that I reviewed is included
2 in my declaration.

3 Q. Have you reviewed any -- any documents from
4 other proceedings relating to the '749 patent?

5 MR. LINDSAY: Objection. Form.

6 THE WITNESS: Other proceedings? What do
7 you mean by "other proceedings"? Can you be more
8 specific?

9 BY MR. SEBBA:

10 Q. Sure.

11 There have been -- there are -- there's a
12 co-pending litigation between Skechers and Nike
13 involving the '749 patent. '749 patent has been in
14 other litigations and IPRs.

15 Have you reviewed any documents from any
16 other proceeding involving the '749 patent?

17 A. Not -- not for '749. I reviewed those for
18 the other patents, but whatever I reviewed for '749
19 is included in the list.

20 Q. So you didn't -- did you review anything in
21 litigation between Skechers and Nike in the Central
22 District of California?

23 MR. LINDSAY: Objection. Form.

24 THE WITNESS: No. The only thing I
25 reviewed -- the other documents I reviewed were

1 related to '749.

2 BY MR. SEBBA:

3 Q. I'm sorry.

4 What do you mean when you say they "were
5 related" to the '749?

6 A. I mean, they are, you know, prior art for
7 '749, for example, or people in -- declarations of
8 the people involved in '749.

9 Q. What declarations have -- did you review?

10 A. There is -- there is the declaration of
11 Grant Delgatty. And there is declaration of Ingrid
12 Ishia -- Ishia -- if I -- if I'm pronouncing it
13 right.

14 And I think they were the only -- oh, there
15 is -- there was the declaration of -- let me see --
16 Dr. Christopher Pastor. I think they were the only
17 three declarations that I -- I was sent.

18 Q. Let's turn to paragraph 77 of your
19 declaration, which is on page 26.

20 A. Yes.

21 Q. Okay. Do you see the heading "Adidas IPR"?

22 A. Yes.

23 Q. And you wrote:

24 "I note that Adidas filed a prior IPR
25 challenging the '749 patent."

1 And then you cite to that prior IPR; is that
2 right?

3 A. Yes.

4 Q. So have you reviewed some of the documents
5 from that IPR?

6 A. Whatever is listed in my -- in my exhibits,
7 I -- I reviewed those.

8 Q. Okay. So just looking at this section, on
9 the next line you cite to Exhibit 1014; is that
10 right?

11 A. Yes.

12 Q. And so you reviewed Exhibit 1014?

13 A. I believe so. It should be in the exhibits.

14 Q. Okay. And then -- so a few lines later, you
15 also refer to Exhibit 1015; is that right?

16 A. That's right.

17 Q. And did you -- so did you review
18 Exhibit 1015?

19 A. Yes, I did. I think it -- again, it should
20 be in the -- in the exhibits.

21 Q. Then if we look lower in the page, there's a
22 heading "Construction of Terms Used in the Claims of
23 the '749 Patent."

24 Do you see that?

25 A. Yes.

1 Q. And there it refers to -- in paragraph 79
2 you state:

3 "I understand that certain terms of the
4 claims of the '749 patent were construed by
5 the Board in the Adidas IPR."

6 Do you see that?

7 A. Yes.

8 Q. And then you cite to Exhibit 1019, which is
9 the Adidas Remand Decision; is that right?

10 A. Yes.

11 Q. So did you review the Adidas Remand
12 Decision?

13 A. I believe I did, yes.

14 Q. Okay. And so did you -- I mean, you're
15 saying you believe you did.

16 Did you just quickly flip through these
17 documents, or did you review them in your entirety?

18 A. I reviewed --

19 MR. LINDSAY: Objection. Form.

20 THE WITNESS: I'm sorry.

21 BY MR. SEBBA:

22 Q. You can still answer.

23 A. Yeah. I -- I -- I reviewed them, yes.

24 But, again, this case started two years ago,
25 so I don't recall exactly when I reviewed them. So

1 that's why -- you know, I -- I wrote this declaration
2 a year ago or so, so ...

3 Q. Okay. Thank you.

4 So let's talk about each of those
5 individually. Let's start with 1014, Exhibit 1014,
6 which is the Adidas Petition.

7 You said you reviewed that -- or when did
8 you review that?

9 A. That must be early 2024. Around that time.
10 First few months of 2024.

11 Q. Okay. And did Adidas discuss the Nishida
12 reference in that petition?

13 A. I have to refresh my mind, if you don't
14 mind.

15 Can I open that document?

16 Q. Sure. And I'll introduce it so we have it
17 on the record, but you can go ahead and introduce --
18 I mean review yours in the meantime.

19 A. So what is your question again? I'm sorry.
20 Could you repeat your question?

21 Q. Did Adidas discuss the Nishida reference?

22 A. They -- I believe so, yes. Yes, yes they
23 did.

24 Q. Okay.

25 A. Nishida with another one. Reed, I believe,

1 if I remember correctly, yes.

2 Q. Sure.

3 And so when you were reviewing Exhibit 1014
4 prior to preparing your declaration, did you -- do
5 you read -- did you read that document from cover to
6 cover?

7 A. Yes, I did.

8 Q. And when you're working as an expert in a
9 case like this, do you typically read each exhibit
10 from cover to cover?

11 A. Yes.

12 Q. Okay. And so did you also read
13 Exhibit 1015, the Adidas IPR Institution Decision,
14 from cover to cover?

15 A. Yes, I did.

16 Q. And did you also read Exhibit 1019, the
17 Adidas Remand Decision, from cover to cover?

18 A. Yes, I did.

19 Q. And then let's also look at -- so do you
20 have Exhibit 1016 there?

21 A. Yes, I do.

22 Q. Okay. And did you review Exhibit 1016 when
23 you were preparing your declaration?

24 A. Yes, I did.

25 Q. And did you read that cover to cover?

1 A. Yes.

2 Q. And do you have Exhibit 1017 there with you?

3 A. Yes.

4 Q. And did you review Exhibit 1017 when you
5 were preparing your declaration?

6 A. Yes, I did.

7 Q. And did you read Exhibit 1017 from cover to
8 cover?

9 A. Yes, I did.

10 Q. For every exhibit identified in your
11 declaration and for the materials you considered, is
12 it your recollection that you carefully reviewed each
13 document from cover to cover?

14 A. Yes. I did it at least once from cover to
15 cover.

16 Q. Okay. So then do you have Exhibit 1005?

17 A. Yes, I do.

18 Q. And so do you see -- let me know when you
19 have it in front of you.

20 A. I do.

21 Q. Okay. Do you see how it says -- on the
22 first page of it, it says Nike versus -- excuse me,
23 it says Nike, Inc., Plaintiff, versus Skechers
24 U.S.A., Inc., Defendant?

25 A. Yes, I do.

1 Q. And at the top it says United States
2 District Court for Central District of California?

3 A. Yes.

4 Q. Okay. And so have you reviewed this
5 document from cover to cover?

6 A. Yes, I did.

7 Q. Okay. And this document is from -- do you
8 understand this document is from the Nike versus
9 Skechers dispute in the Central District of
10 California?

11 A. Yes.

12 Q. Okay. Let's look at Exhibit 1006.

13 A. Yes.

14 Q. Did you review this document when you were
15 preparing your declaration?

16 A. Yes, I believe I did.

17 Q. Okay. And did you review it from cover to
18 cover when you were preparing your declaration?

19 A. Yes.

20 Q. Let's look at Exhibit 1007.

21 A. Yes.

22 Q. Did you review Exhibit 1007 when you were
23 preparing your declaration?

24 A. Yes, I believe I did.

25 Q. And did you review it from cover to cover

1 when you were preparing your declaration?

2 A. Yes.

3 Q. Okay.

4 MR. SEBBA: And I just saw a question from
5 Emily in the chat asking if I'm introducing these and
6 I'll -- I'll tell you, I -- I will mark them all at
7 the next break. I'm keeping track of them on my own.

8 BY MR. SEBBA:

9 Q. Then, let's look at Exhibit 1008.

10 Do you have that?

11 A. By the way, I don't -- I didn't see that
12 message in the chat, so I don't know if there is
13 another chat that is being used.

14 Q. It -- it looks like it was sent just to me.

15 A. Oh, okay. Just -- just to make sure that,
16 you know, I'm not missing any chat documents.

17 Q. Of course.

18 Do you have Exhibit 1008?

19 A. 1008. Yes.

20 Q. Okay. Did you review Exhibit 1008 when you
21 were preparing your declaration?

22 A. I believe I did.

23 Q. And did you review Exhibit 1008 from cover
24 to cover when you were preparing your declaration?

25 A. I believe I did.

1 Q. Okay. Let's look at 1009.

2 Do you have Exhibit 1009 in front of you?

3 A. Yes.

4 Q. Okay. Did you review Exhibit 1009 from
5 cover to cover when you were preparing your
6 declaration?

7 A. Yes, I believe I did.

8 Q. Okay. And let's look at Exhibit 1010.

9 A. Yes.

10 Q. Did you review Exhibit 1010 from cover to
11 cover when you were preparing your declaration?

12 A. Yes.

13 Q. Okay. And let's look at Exhibit 1011.

14 A. Yes.

15 Q. Did you review Exhibit 1011 from cover to
16 cover when you were preparing your declaration?

17 A. Yes, I believe I did.

18 Q. When you rendered your opinions in this
19 case, did you perform your analysis in view of all
20 the evidence and arguments contained in the prior
21 litigation-related exhibits we just discussed?

22 A. The exhibits that we just opened?

23 Q. Yeah.

24 A. Yes. At least some of them are included.

25 Q. Are you aware of any of these -- of -- are

1 you aware of any that you didn't include in part of
2 your analysis?

3 MR. LINDSAY: Objection. Form.

4 THE WITNESS: Well, I don't -- I don't
5 recall right now. I don't believe so. But again, it
6 has been more than a year. You know, first -- first
7 several months of 2004, I think, when I reviewed
8 these. So it has been more than a year, and I need
9 to -- I have to, you know, check whether I, you know,
10 included every one of them or not. But I believe I
11 did because I read all of them, and I used the
12 information from them.

13 BY MR. SEBBA:

14 Q. And just to clarify for the record, it was
15 the first several months of which year that you
16 believe you reviewed these?

17 A. 2024.

18 Q. Thank you.

19 MR. SEBBA: All right. We've been going
20 about an hour. I think now might be a good time for
21 a break.

22 Do you want to go off the record for, I
23 don't know, five -- five minutes or so?

24 THE WITNESS: Okay.

25 VIDEOGRAPHER: We are off the record at

1 9:28 a.m.

2 (Short recess taken.)

3 VIDEOGRAPHER: This is the beginning of
4 Media File No. 2. We are back on the record at
5 9:39 a.m.

6 BY MR. SEBBA:

7 Q. Welcome back, Dr. Adanur.

8 Did you speak to anyone during the break?

9 A. No.

10 Q. So just returning to what we were talking
11 about, you said that you reviewed the exhibits to
12 your declaration in early 2024; is that right?

13 A. Well, it started early 2024 and then
14 continued until I submitted the declaration.

15 Q. Okay. So when you performed your analysis
16 in this case in preparing your declaration, did you
17 analyze the prior art from the perspective of a
18 skilled artisan in 2024?

19 A. You mean 2004?

20 Q. So when you performed the analysis in this
21 case, did you analyze the prior art from the
22 perspective of a skilled artisan in 2024?

23 A. No. I analyzed it from the perspective of
24 2004.

25 Q. Okay. So you're -- you're -- we just

1 discussed how you reviewed materials from the
2 Skechers and Nike litigation as well as the Adidas
3 and Nike IPRs; is that right?

4 A. Well, again, in Adidas versus Nike case, my
5 enrollment was different. You know, I was not
6 reviewing documents from Adidas. I was reviewing
7 you, know, documents independently, my own documents,
8 so ...

9 Q. Sure.

10 But if some of the exhibits we just
11 discussed, Exhibit 1014 --

12 A. Oh, okay.

13 Q. -- 1015, 1016, 1017, and 1019 were from
14 Adidas and Nike's.

15 A. Okay. Okay. Sorry. Sorry. I
16 misunderstood you. Yes.

17 Q. Okay. So you reviewed documents from the
18 dispute between Nike and Skechers and a different
19 dispute between Nike and Adidas; is that correct?

20 A. Yes, yes.

21 Q. And those documents were from, you know,
22 2018 to 2024 -- or were dated from between 2018 to
23 2024; is that right?

24 A. I would agree, 2000 -- there is one 2017.

25 Q. Okay. So those documents were dated from

1 2017 to 2024; is that right?

2 A. Yes. And, again, I have to check the -- the
3 date of each one, but I mean, if you say so, I'll --
4 I'll accept it.

5 Q. Okay. So if you reviewed those materials
6 from, you know, these litigations and IPRs from more
7 recently, how could you -- how would you be able to
8 analyze the prior art from the perspective of someone
9 in 2004?

10 A. Well, there -- I've reviewed those
11 documents, but my analysis is based on -- on -- on a
12 POSITA during 2004 time frame.

13 Q. And how would you be able to do that after
14 having reviewed these much more recent documents?

15 MR. LINDSAY: Objection to form.

16 THE WITNESS: I mean, I -- I didn't
17 understand your question.

18 Could you repeat?

19 BY MR. SEBBA:

20 Q. Sure.

21 So --

22 A. I mean, what -- what is wrong -- I mean, why
23 not?

24 Q. So when you were preparing your declaration,
25 you had seen documents and evidence that were from

1 much later than 2004, and you had reviewed that and
2 that factored into your analysis.

3 And so how would you be able to factor that
4 into your analysis while also looking at it from the
5 perspective of someone from 2004?

6 MR. LINDSAY: Objection. Form. Misstates
7 prior testimony.

8 THE WITNESS: Really, I did not factor them
9 in from a technical point of view. You know, those
10 are legal documents, I understand, the documents that
11 we just opened, you asked me to open. Those are
12 legal documents about the case, but, you know, my
13 technical analysis is based on -- on a -- you know,
14 on the time frame of 2004 and before from the point
15 of view -- view of a POSITA.

16 So, you know, I don't see really direct
17 relation there with some of the legal documents and
18 then, you know, technical aspect of the issue.

19 BY MR. SEBBA:

20 Q. Would a skilled artisan in 2004 have had an
21 opportunity to review those materials?

22 A. Well, based -- those materials are a lot
23 later. But again, those are mostly -- as far as I
24 can tell, those are mostly legal documents, although,
25 you know, they may be discussing technical issues

1 too. But they are mostly legal documents, and -- and
2 so a person, you know, before 2004, of course, could
3 not review those.

4 Q. So would a skilled artisan in 2004 have been
5 presented with those documents and arguments?

6 A. Would you repeat your question?

7 Q. Would a skilled artisan in 2004 have been
8 presented with those documents and those arguments?

9 MR. LINDSAY: Objection. Form.

10 THE WITNESS: I mean, those documents are,
11 you know, late 2010s, early 2020s. So it would be
12 impossible for a person to review them in 2004.

13 BY MR. SEBBA:

14 Q. So did you just forget about these documents
15 when it came time to perform your analysis?

16 MR. LINDSAY: Objection. Form.

17 THE WITNESS: No, I didn't forget about
18 them, but I just did not read them again, you know,
19 for my -- for my -- for this deposition.

20 I mean, once I submitted my declaration and,
21 you know, those documents, I read them before I
22 submit my declaration in October 2024.

23 BY MR. SEBBA:

24 Q. And so did you just forget about them while
25 you were preparing your declaration?

1 MR. LINDSAY: Objection. Form.

2 THE WITNESS: Well, I -- I don't think that
3 I forgot about them, but I don't think that, you
4 know, I can remember everything written -- written in
5 those several documents either word by word.

6 BY MR. SEBBA:

7 Q. Okay. So you said that you didn't consider
8 these documents for your technical analysis.

9 Did you perform some other nontechnical
10 analysis?

11 A. Well, I considered those documents, you
12 know, whatever is useful and necessary in them, in my
13 declaration, such as terms, technical terms. I think
14 they were identified by the board, so I used those
15 technical terms.

16 Q. So you used parts of these -- of those
17 documents when forming your analysis.

18 A. I used whatever I felt --

19 MR. LINDSAY: Objection.

20 THE WITNESS: I'm sorry.

21 MR. LINDSAY: Objection. Form.

22 Go ahead.

23 THE WITNESS: I used whatever I felt that
24 was necessary for my technical report.

25 ///

1 BY MR. SEBBA:

2 Q. And so what -- what did you use from those
3 documents in forming your technical report?

4 A. As I said, there are some technical terms
5 that were defined between the parties and with the
6 board, so I used those terms, for example.

7 Q. Did you use anything else in those documents
8 in forming your technical report?

9 A. I -- I probably did. But again, I have to
10 do a comparison. Again, those reports, I read them
11 more than a year ago, a year ago at least. More
12 than -- more than a year ago, so -- but whatever I
13 mentioned in my report, you know, I used them.

14 Q. So you don't recall if there was additional
15 information from those documents that you used in
16 your declaration?

17 A. What do you mean by "additional"?
18 Additional with respect to what?

19 Q. So you said that you -- you said you used
20 some of the technical terms defined by the board in
21 your declaration; is that right?

22 A. Yes.

23 Q. And as we sit here today, you don't recall
24 if you used any additional information from these IPR
25 litigation documents in preparing your declaration.

1 A. I might have, and they are included in my --
2 in my declaration as referenced.

3 Q. How did you -- so then you also said that --
4 I believe you said you used any information that was
5 necessary; is that right?

6 A. Yes.

7 MR. LINDSAY: Objection. Form. Misstates
8 prior testimony.

9 BY MR. SEBBA:

10 Q. How did you decide what was necessary?

11 A. Well, if it was relevant to the technical
12 side -- side of it, technical aspect of the case,
13 then I used -- I used it.

14 Q. And how did you decide what was relevant to
15 the technical aspect of the case?

16 A. Well, I know the case. I mean, it is about
17 '749 patent, IPR petition for the patent. So if
18 there was any document -- any information that --
19 that was related to technical side of '749, then I
20 used it.

21 And you just mentioned, you know, related to
22 Adidas IPR case, for example, I used -- I used 10 --
23 1014 and 1015.

24 Q. So from these exhibits that were from the
25 prior litigations and IPRs involving other parties

1 and some other prior art, you considered all aspects
2 of those documents that were related to the technical
3 side of the '749; is that right?

4 A. Yes, I tried to.

5 Q. And these prior litigations and IPRs involve
6 prior art that isn't presented in this proceeding; is
7 that right?

8 A. Could you repeat the question, please?

9 Q. Sure. So let's do it one at a time.

10 Did the Adidas IPR that you considered
11 involve prior art that isn't at issue in this IPR?

12 A. Well, if it was not an issue in this IPR, I
13 did not include it in my report.

14 Q. All right. Let's go back to your
15 declaration, paragraph 77.

16 A. Okay.

17 Q. Let me know when you are there.

18 A. Yes, I am there.

19 Q. Okay. The second sentence of paragraph 77
20 reads:

21 "The petition relied on a combination of
22 Nishida and US3,895,003" or ('Reed')."

23 Is that right?

24 A. Yes.

25 Q. Okay. So did the Adidas IPR involve prior

1 art that is not at issue in this IPR?

2 A. I don't -- I'd have to check that. I don't
3 recall right now. Again --

4 Q. Okay.

5 A. -- it has been some time.

6 Q. So you, in your declaration, say that the
7 Adidas IPR relied on Nishida and Reed; is that right?

8 A. Yes.

9 Q. Okay. And do you rely on Reed as prior art
10 in this IPR?

11 A. No. I just mentioned it because it was
12 mentioned in the Adidas case.

13 Q. So the Adidas IPR involved at least one
14 reference that you don't -- that is not at issue in
15 this IPR.

16 A. I -- yeah. Well, actually, you know, I
17 referred to -- I -- Reed document also in my -- in my
18 presentation -- I -- in my declaration. But that was
19 not the main prior art that I used.

20 Q. Okay. Did the -- all right. How about --
21 let's go to Exhibit 1014, then.

22 (Exhibit 1014 was marked for
23 identification.)

24 BY MR. SEBBA:

25 Q. Let me know when you're there.

1 A. Exhibit 1014. Yes.

2 Q. Do you have it open?

3 A. Yes, I do.

4 Q. Okay. Let's turn to page 7 of that exhibit,
5 which is page 12 of the PDF, but it's listed as
6 page 7 at the bottom of the page.

7 A. Yes.

8 Q. All right. You see that there's multiple
9 grounds listed about three-quarters of the way down
10 the page?

11 A. Yes.

12 Q. And one of them is Castello, Fujiwara, and
13 Nishida?

14 A. Yes.

15 Q. Okay. So those -- that's -- does that mean
16 that Castello and Fujiwara are other references at
17 issue in the IPR in Exhibit 1014?

18 A. Yes, I would say so.

19 Q. And that prior art isn't presented in this
20 proceeding; is that right?

21 A. That's right. Fujiwara and Castello -- no.

22 Q. Okay.

23 MR. SEBBA: All right. Let's look at
24 Exhibit 1020.

25 ///

1 (Exhibit 1020 was marked for
2 identification.)

3 THE WITNESS: Exhibit 1020.

4 Let me see. Sorry.

5 Yes. Sorry about that.

6 BY MR. SEBBA:

7 Q. Okay.

8 A. Took longer than I thought.

9 Q. Not a problem.

10 All right. So do you have 1020 open?

11 A. Yes.

12 Q. Okay. And what is Exhibit 1020?

13 A. This is a patent by Orei, et al.

14 Q. Okay. If I refer to Exhibit 1020 as Orei,
15 will you know what I'm referring to?

16 A. Yes. Please use the name Orei.

17 Q. Okay. All right.

18 At a high level, what is Orei disclosing?

19 A. Orei is disclosing shoe fabrics -- fabrics
20 to make a shoe -- athletic shoes.

21 Q. Okay. So let's look at Figure 1 of Orei.

22 A. Yes.

23 Q. Let me know when you are there.

24 A. I'm there.

25 Q. Okay. What is Figure 1 showing us?

1 A. Figure 1 is showing different elements of
2 the shoe upper fabrics.

3 Q. Okay. In what -- in what setting are these
4 different elements of the upper shoe fabrics?

5 MR. LINDSAY: Objection. Form.

6 THE WITNESS: What do you mean by "setting"?

7 BY MR. SEBBA:

8 Q. Sure. Sure.

9 How are these shoe upper fabrics laid out?

10 A. These are laid out on a -- a larger fabric
11 surrounding these parts, and then these parts are cut
12 and then stitched to make the shoe upper.

13 Q. Okay. So if we look at your declaration,
14 let's look at paragraph 124 at the bottom of page 58.

15 A. Paragraph 124. Okay. Let me get there.
16 Yes.

17 Q. Okay. So you say:

18 "Orei's continuous knitted fabric
19 surrounding the knitted shoe parts has been
20 highlighted in brown below for FIGs. 1 and
21 5."

22 Is that right?

23 A. Yes.

24 Q. Okay. And then on the next page is
25 Figure 1. Excuse me, is an annotated version of

1 Figure 1.

2 A. That's right.

3 Q. Okay. So what is the annotated -- what are
4 the annotations showing?

5 A. The annotation is showing the surrounding
6 fabric in brown and then different portions of the
7 fabric elements with different mesh -- meshes in
8 green, aqua, and pink and gray.

9 Q. Okay. Now, you say that it's showing the
10 surrounding fabric in brown; is that right?

11 A. That's right.

12 Q. Okay. Where in Orei does -- is there a
13 description of Figure 1 that says there's a
14 surrounding fabric for these shoe elements?

15 A. Okay. I'll show it to you. But before
16 that, this is made, you know, on a -- on a machine,
17 and that is the only way to make those pieces as part
18 of a larger fabric surrounding.

19 And if you go -- you know, if you go to
20 exhibits, for example, Karl Mayer and Liba, those are
21 Raschel warp knitting machines, and if you look at
22 those pictures of the machine, with the fabric on it,
23 you see that that fabric is a -- you know, a constant
24 width fabric in rectangular shape. I mean, can I
25 open and show it to you, the -- the Exhibit 2027 --

1 1027, for example?

2 Q. Sure.

3 A. Yeah. If you open 1027, on the very first
4 page, there is that fabric with the fabric roll in
5 the front and the width of the fabric roll is fixed
6 on the machine. And that comes from the warp yarns
7 on top of the machine, the width of the warp yarns,
8 that is the width of the fabric. So that is the only
9 way to produce those elements, those four or five
10 elements as part of the surrounding fabric. So that
11 is one thing.

12 And the same thing, you can look at 1028.
13 Let's see if it has a picture of the machine.

14 No, it doesn't have the picture of the
15 machine. There's a schematic of the machine which
16 shows but from the side. Maybe 1029 -- yeah, 1029,
17 there is also a double needle bar Raschel machine,
18 and you can see the fabric -- again, the width of the
19 fabric, the surrounding fabric is fixed. So that's
20 the only way to make those smaller pieces as part of
21 that surrounding fabric.

22 But also, Orei indicates that he is using
23 that surrounding fabric. And, for example, if you go
24 Column 2, line 5, "BRIEF DESCRIPTION OF THE
25 DRAWINGS," it says:

1 "FIG. 1 is a plan view showing a shoe
2 pattern" -- "a shoe pattern using a double
3 raschel warp knitted fabric."

4 So, you know, single fabric.

5 The same thing in Figure 5.

6 "FIG. 5 is a plan view showing a shoe
7 pattern using a double raschel warp knitted
8 fabric according to Embodiment 3 of the
9 present invention."

10 And also, if you go to Column 4, line 16, it
11 says:

12 "Shoe patterns 10 matched to paper patterns
13 are placed continuously on one knitted fabric
14 as shown in FIG. 1."

15 One knitted fabric. So those patterns are
16 placed on one knitted fabric. So they prove there is
17 a surrounding fabric.

18 Q. You used the word -- let me ask that a
19 different way.

20 Do knitting machines place objects?

21 A. Place objects where?

22 Q. Anywhere.

23 A. Could you be more specific?

24 Q. Sure.

25 A. Oh, you mean anywhere on the surrounding

1 fabric?

2 Q. Mm-hmm.

3 A. Yeah. Yes, you can place them anywhere
4 within -- within the fabric, surrounding fabric.

5 Q. Are there any other parts of Orei that
6 indicate that there's -- that the -- what you've
7 shaded brown is fabric?

8 A. Yeah. In the claims, for example, it says:
9 "A shoe" --

10 Claim 1, independent claim:

11 -- "an upper material using" -- "a double
12 raschel warp knitted fabric."

13 So -- and there may be more. Again,
14 independent Claim 6:

15 "A shoe comprising:

16 "a double raschel warp knitted fabric" and
17 then it keeps going.

18 Q. All right. So Orei doesn't specifically
19 identify the textile that you've shaded brown; is
20 that right?

21 A. I -- I -- I would agree with that.

22 Q. Okay. And where in Orei do you see that
23 Figure 1 is not shown after the components are cut
24 from each other?

25 MR. LINDSAY: Objection. Form.

1 THE WITNESS: Well, again, you cannot make
2 those components without a larger surrounding fabric
3 on those double -- Raschel double needle bar
4 machines. You simply cannot do it. So therefore,
5 those elements, those individual elements are placed
6 on the surrounding fabric and then -- the fabric and
7 those elements are made simultaneously, and then the
8 fabric is removed from the machine, and then those
9 parts are cut.

10 BY MR. SEBBA:

11 Q. Okay. So that's helpful, but that's not
12 quite my question.

13 Specifically when looking at Figure 1 --

14 A. Yes.

15 Q. -- where -- where in Orei is it disclosed
16 that Figure 1 is not shown after the components are
17 cut from something else?

18 A. Well, again, as I --

19 MR. LINDSAY: Objection. Form.

20 THE WITNESS: I'm sorry.

21 As I -- as I mentioned those places, he
22 talks about a fabric. And here there are multiple
23 elements. So, you know, obviously, he's not talking
24 about those multiple elements. He's saying a fabric
25 in those places that I indicated. Again, definition

1 of Figure 1, Figure 5, and I believe that was what,
2 Column 4 -- Column 4, line 16 through -- 16, 17.

3 Okay. It says "continuously on one knitted fabric."

4 And so based on those facts, it is very easy
5 for a POSITA to understand that those pieces were
6 made together with the -- with the wider fabric as
7 shown in those machine pictures.

8 So that's -- that's not -- given for a
9 POSITA based on what Orei also discloses.

10 BY MR. SEBBA:

11 Q. Okay. So Orei discloses folding these into
12 a shoe; is that right?

13 MR. LINDSAY: Objection. Form.

14 THE WITNESS: Partly folding, yes, and
15 stitching.

16 BY MR. SEBBA:

17 Q. Folding and stitching. Thank you.

18 If we look a few rows below what you
19 discuss, Column 4, line 25.

20 Let me know when you're there.

21 A. Yes, I'm there.

22 Q. Okay. It says:

23 "A cut 13 at the tip is a part that becomes
24 circular shape at the stie of the tiptoe when
25 folded into the shoe sole."

1 Is that right?

2 A. Yes.

3 Q. Okay. So what we're looking at in Figure 1
4 has -- includes a cut; is that right?

5 A. Well, that cut -- what he meant is, you
6 know, the shape. There's a cut -- as if it is cut.
7 You know, the -- the pattern, the drawing there of
8 the pattern is that -- you know, that -- that piece
9 is designed to have a V shape which looks like cut,
10 you know. But that is part of the design.

11 Q. So what's your basis for saying that the cut
12 is a shape and not a physical cut?

13 A. Well, again, that -- you know, that piece on
14 the top -- there are one, two, three, four separate
15 pieces, four separate elements, and each element is
16 knitted with those shapes, you know, together with
17 the -- simultaneous with the surrounding fabric. So
18 he is naming that -- you know, that V shape drawn
19 there as a cut.

20 But, you know, also, all these four pieces
21 would be cut with scissors or machine, laser, for
22 example, with a laser machine, would be cut to make
23 into shoe upper. But the cut 13 that he's using here
24 is -- he's referring to -- to the shape of that --
25 that section.

1 Q. Okay. As we sit here, can you identify
2 anything in Orei that specifies that that cut is a
3 shape and not a cut?

4 A. No. I think that's the only -- the only
5 place he mentioned that as a cut for -- 13, I
6 believe.

7 But, you know, again, those pieces would be
8 cut from the surrounding fabric. And if he was
9 using, you know, that physical cut, then he would
10 include other elements, other portions too.

11 Q. I'm sorry. Explain that a little more. If
12 he was -- why would he include other elements?

13 A. If he was referring to a physical cut for
14 No. 13, I mean, he would say for other parts too,
15 because all those four parts, four elements, you
16 know, are going to be cut from the surrounding fabric
17 and then made into a shoe upper. So he didn't, you
18 know, mention any of these -- any of the other parts
19 or elements for the No. 13, except, you know, for
20 that V shape bay, you know, bay -- bay, H2M3 area.

21 So that's -- that's proof that he's
22 referring to the geometry of the -- of that section
23 of the shoe.

24 Q. So the reason that you believe the cut 13 is
25 a shape and not a cut is that there are not

1 references to other pieces being cut; is that
2 correct?

3 A. Yeah. I mean, he would include other pieces
4 too, that, you know, they would be cut together, all
5 together.

6 Q. Okay. Do you have any other reason to
7 believe that cut 13 is not a cut?

8 A. Well, it will be cut -- of course, it will
9 be cut later to make the shoe. So all those --
10 surroundings of those elements will be cut along
11 those outer lines and, you know, and -- and folded
12 and then stitched together to make the -- a shoe
13 upper.

14 But that No. 13 is referring only to -- to
15 the geometry in that figure.

16 Q. Do you ever use the word "cut" to refer to
17 geometry?

18 A. I might. I mean, I don't remember right
19 now, but I might.

20 Q. Can you recall any time that you've used the
21 word "cut" to refer to geometry?

22 A. Well, probably not recently, but, you know,
23 a cut, I believe it is used for geometry.

24 Q. Can you recall any exam- -- any other
25 documents or publications that use the words -- word

1 "cut" as geometry -- for geometry?

2 A. Well, not top of my head. But, you know,
3 I'm sure it is used and, you know, it is -- it is
4 logical to use "cut" to define the geometry,
5 different geometry shapes.

6 Q. Is it more logical to use the word "cut" to
7 define geometry or a cut?

8 A. Well, it depends on the person using it.

9 Q. Okay. Looking at Figure 1 --

10 A. Yes.

11 Q. Excuse me. Looking at the annotated
12 Figure 1 on page 59 of your declaration.

13 A. Okay.

14 Q. Let me know if you're there.

15 A. Yes.

16 Q. Okay. And just so the record's clear, I'm
17 referring to the annotated Figure 1 of Orei on
18 page 59 of your declaration.

19 A. Yes.

20 Q. Let's -- there are four shapes here; is that
21 right?

22 A. That's right. Four independent shapes.

23 Q. Okay. If I refer to them as -- well, let me
24 start over.

25 At the top, there's one -- there's a shape

1 that has a 1a coming out of it.

2 Do you see it?

3 A. Yes.

4 Q. If I refer to that as the north shape, will
5 you know what I'm referring to?

6 A. Okay. I will -- I'll -- I'll follow that.

7 Q. I'm trying to come up with a short name.
8 I -- I'm happy if you have another suggestion for a
9 way to refer to that.

10 A. No. Top -- top would be fine too.

11 Q. Top, great. We'll call it the top piece or
12 top shape.

13 A. Okay.

14 Q. Then next to it, there's a shape with 1c
15 coming out of it.

16 Do you see that?

17 A. Yes, I do.

18 Q. Okay. Should we refer to that as the right
19 shape? Will that -- will you understand that?

20 A. Yes.

21 Q. Okay. Then there's a pink shape or pink and
22 gray shape.

23 Do you see that?

24 A. Yes.

25 Q. Okay. If we refer to that as the bottom

1 shape, will you understand what we're referring to?

2 A. Yes.

3 Q. Okay. And then there's one more shape. If
4 we call that the left shape, will you understand what
5 that's referring to?

6 A. Yes.

7 Q. Okay. So let's look at the -- let's start
8 by looking at the top shape and the right shape.

9 A. Okay.

10 Q. Okay. At the bottom right of the top shape,
11 there's -- it is cut as though there's a line, then a
12 deeper slope, and then another line.

13 Do you see that?

14 A. Yes.

15 Q. You know what, actually, I'm sorry. I'm
16 going to share my screen. That's going to make this
17 process easier. Let me do that.

18 All right. Are you seeing page -- do you
19 see me sharing page 59 of your declaration?

20 A. Yes, I do.

21 Q. Okay. I'm going to zoom in a bit.

22 All right. Do you still see it?

23 A. Yes.

24 Q. Okay. And can you see my cursor on the
25 screen share?

1 A. Yes.

2 Q. Yes. Okay.

3 And so now, here on the -- so as I was
4 referring to before, on the bottom right of the top
5 shape here, excuse me, is this line.

6 A. Yes.

7 Q. How -- how would you like to refer to that?

8 A. Bottom right line of top shape.

9 Q. Great. We've got the bottom right line of
10 the top shape.

11 And we've got here on the right shape the
12 top line.

13 Do you see that?

14 A. Yes.

15 Q. Okay. And so those -- are those
16 approximately the same shape?

17 A. They look like.

18 Q. Okay. And then do you see in the right
19 shape, there's the -- at the top, there's a light
20 blue dotted stripe? Do you see that?

21 A. Yes.

22 Q. And on the top shape at the bottom, touching
23 the bottom right line of the top shape, there's
24 another light blue shape.

25 Do you see that?

1 A. Yes.

2 Q. Okay. And the portions where the light
3 blue -- let me step back --

4 On the top shape where the light blue shape
5 intersects the bottom right line, do you see that?

6 A. Yeah.

7 Q. Okay. If I -- can I refer to that as the
8 blue intersection of the top shape?

9 A. That's fine.

10 Q. Okay. And then on the right shape, there's
11 also the -- the light blue line that we were
12 referring to intersects the top line.

13 Do you see that?

14 A. Yes.

15 Q. Okay. If I refer to that as the light blue
16 intersection of the right shape, will you understand
17 what I'm referring to?

18 A. Yes.

19 Q. Okay. So now, if we look -- do those -- do
20 the intersections of the light blue shape on the
21 right shape and the light blue shape of the top
22 shape, do those also match?

23 A. Well, as a POSITA, yes, they should match.

24 Q. They should match. Okay. So --

25 A. But you don't know unless you cut them and

1 put them side by side, of course.

2 Q. Of course.

3 But they look approximately like they match;
4 is that right?

5 A. Yes.

6 Q. Okay. So would that be consistent with the
7 top shape and the right shape having been originally
8 joined and then cut apart?

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

10 Q. Why not?

11 A. Well, there are -- there may be several
12 reasons for that. One is the symmetry. So, you
13 know, if you do that, you would -- you would spoil
14 the symmetry, and that symmetry may be needed during
15 the fabrication of the -- of the -- of the fabric as
16 well as during the cutting -- cutting that is
17 wanting.

18 Also, if they were joined together, then you
19 know, you need to cut them through the -- through
20 those borders -- border lines, and that would cause
21 more problems because -- because then you would have
22 raveling or unraveling -- I guess they are the same
23 words -- problem of the -- the fibers of the yarns
24 from those pieces. And that would cause -- you know,
25 that would generate fringes, fringed yarns,

1 et cetera. So you wouldn't want to do that.

2 Q. Okay. If we could look at figures -- here,
3 I'm going to stop sharing my screen.

4 If we look at Figures 2 and 3 of Orei. Let
5 me know when you're there.

6 A. Okay. Let's see. Figure 2 and 3. Yes.

7 Q. Okay. So that is -- what -- what is shown
8 in Figures 2 and 3 of Orei?

9 A. They look -- they -- they show what looks
10 like a complete shoe --

11 Q. Okay.

12 A. -- two complete shoes.

13 Q. So are these the shoes that are assembled
14 from the pieces in Figure 1?

15 A. Yes, I -- I would say so.

16 Q. Okay. Do those -- do -- when you look at
17 those, do you see the bottom right line of the top
18 piece of Figure 1 connecting to the top line of the
19 right piece of Figure 1?

20 A. Yes, I think I can see that.

21 Q. Where is that?

22 A. That should be just -- in Figure 2 --

23 Q. Mm-hmm.

24 A. -- that should be just above 1c. The -- you
25 know, the piece that is shown as 1c just above that.

1 And -- and 1c, 3a, and 1b, just the top of those.

2 Again, here, if -- you know, I'm guessing
3 because, you know, to be sure, of course you need to
4 cut those pieces and put together. But just, you
5 know, visualizing Figure 1 and then putting the
6 pieces together in my mind, that's what it looks
7 like, yes.

8 Q. What is a continuous knitted fabric?

9 A. Continuous knitted fabric is -- all -- all
10 the knitted fabrics are continuously produced.
11 Whether it is on the weft knitting machines or warp
12 knitting machines, the fabric is continuous along
13 the -- along the whole width of the fabric. So in
14 the width direction as well as along the machine
15 direction. So X direction and Y direction the -- the
16 fabrics knitted continuously.

17 Q. So a -- the continuous knitted fabric is --
18 is that referring to --

19 A. Basically, it is referring to the
20 surrounding fabric.

21 Q. It means that there's no physical breaks in
22 the resulting knit; is that right?

23 A. That's right. Unless it is by design. If
24 you want a small opening in the fabric, then you
25 would have a discontinuous place there, but that

1 is -- to put meshes, for example. But other than
2 that, yes, the fabric has to be continuous.

3 Q. So the "continuous" relates to the physical
4 placement of components of the resulting knit; is
5 that right?

6 A. Exactly.

7 MR. LINDSAY: Objection. Form.

8 THE WITNESS: I'm sorry.

9 Yes, exactly.

10 In fact, you know, the fabric behind me
11 is -- you know, if you look at that fabric and if you
12 draw a line across it, that line, you know, moves up
13 all together across the whole width of the fabric
14 when the fabric is manufactured. So that is --
15 that's why it is called continuous. And of course,
16 it is continuous in the width direction as well. But
17 the -- the growing or manufacturing of the fabric is
18 in the vertical direction. So that -- if you draw a
19 line, then that would continue moving up, like,
20 continuously across the whole width.

21 BY MR. SEBBA:

22 Q. Okay. Let's look -- let's go back to your
23 declaration. Give me a moment to find the page.
24 Page 60 of the declaration, which is page 67 of the
25 PDF.

1 A. Yes.

2 Q. Okay. At the top of this page is an
3 annotated version of Orei Figure 5; is that right?

4 A. That's right.

5 Q. Okay. And did you make this annotation?

6 A. I don't remember who did it, me or the
7 counsel.

8 Q. Okay. And so you -- or the brown shading
9 was added to Figure 5 as part of the annotation; is
10 that right?

11 A. That's right.

12 Q. Okay. Let's look at the top of Figure 5.
13 There's a piece with a label -- there's a piece 31 at
14 the top; is that right?

15 A. That's right.

16 Q. And then below it, there's piece 32; is that
17 right?

18 A. That's right.

19 Q. Okay. Does the top of piece 32 line up with
20 the bottom of piece 31?

21 A. It looks like that, on the right side at
22 least.

23 Q. Great.

24 MR. SEBBA: All right. We've been going
25 about an hour. Now might be a good time for a break.

1 Another five minutes or so, if that works for
2 everyone.

3 THE WITNESS: Yes.

4 MR. SEBBA: Great.

5 VIDEOGRAPHER: We are off the record at
6 10:40 a.m.

7 (Short recess taken.)

8 VIDEOGRAPHER: This is the beginning of
9 Media File No. 3. The time is 10:53.

10 BY MR. SEBBA:

11 Q. Welcome back, Dr. Adanur.

12 A. Thank you.

13 Q. Let's go back to your declaration. Let me
14 know when you're there.

15 A. Yes, I am there.

16 Q. Okay. Let's go to page 61 of the
17 declaration, paragraph 127.

18 A. Yes.

19 Q. Okay. You say there:

20 "In addition, it was well known to use
21 double needle-bar raschel machines of the
22 same type Orei envisions to knit textile
23 elements simultaneously with surrounding
24 textile structures."

25 Did I read that correctly?

1 A. Yes.

2 Q. Okay. And then you cite to Exhibit 1050,
3 which is Spencer; is that right?

4 A. Yes. Yes. And there's a typo there. 201,
5 page 201 should be 363.

6 Q. Okay. Great. I'm going to -- I appreciate
7 that clarification. And I'm going to introduce --
8 well, I suppose, let's -- we can -- we can talk about
9 1050, and I'm just going to add it into the Exhibit
10 Share for Emily.

11 So do you have Exhibit 1050 with you?

12 (Exhibit 1050 was marked for
13 identification.)

14 THE WITNESS: 1050, yes.

15 BY MR. SEBBA:

16 Q. Okay. And -- well, I'm sorry. What page --
17 you said it should be 363; is that right?

18 A. That's right, yes.

19 Q. Okay. So -- and your -- you refer to
20 your -- you quote the first sentence of the section
21 numbered 29.5.3 in Exhibit 1050; is that right?

22 A. Yes. I'm almost there. Sorry.

23 Q. Oh, sure. Sorry. Go ahead.

24 A. Yes.

25 Q. You're there?

1 A. Yes.

2 Q. And you quote that first sentence in the
3 section titled "29.5.3"; is that right?

4 A. Yes.

5 Q. And I'm sorry. I misspoke. Let me just
6 clarify the record.

7 You quote the first sentence of the section
8 numbered "29.5.3"; is that right?

9 A. Yes.

10 Q. Okay. Thank you.

11 And it states that:

12 "Some raschel double needle bed products are
13 in the form of articles, a number of which
14 can be simultaneously knitted side-by-side
15 across the needle bed."

16 Is that right?

17 A. Yes.

18 Q. Okay. So if they're knitted side by side,
19 that means that the articles discussed in Spencer are
20 touching each other; is that right?

21 A. Not -- not necessarily.

22 Q. All right. Well, where in Spencer do you
23 see that?

24 A. Well, side-by-side means next to each other.
25 I mean, if I am sitting with somebody side by side,

1 that doesn't mean that I am touching that person. So
2 there may still be a gap between us. So here, side
3 by side doesn't mean that they are touching.

4 Q. Okay. Let's look at the final paragraph of
5 that same section, 29.5.3.

6 Do you see that?

7 A. Yes.

8 Q. It says:

9 "The scarf fabric is knitted as a
10 continuous strip of double-faced fabric with
11 the fringe sections composed of two-wale wide
12 strips, each unconnected by underlaps to its
13 neighbour."

14 Do you see that?

15 A. Yes.

16 Q. Then it says:

17 "Each scarf piece is separated from the next
18 by cutting through the center of the fringe
19 section and seaming the ends to secure them."

20 Is that right?

21 A. Yes.

22 Q. Okay. So if they're separated -- if each
23 scarf piece is separated by cutting through a fringe
24 section --

25 A. Yes.

1 Q. -- doesn't that suggest that they're
2 touching?

3 A. Well, no. It just -- the fringe section
4 means that they're not touching each other. That's
5 why there is a fringe there.

6 Q. So it's cut through the center of the fringe
7 section, and then the cut ends are seamed; is that
8 right?

9 A. Yeah.

10 Q. So if Spencer -- does Spencer refer to any
11 waste material in this process?

12 A. Well, this is a process to make, as -- as
13 the paragraph indicates, bed products, for example,
14 scarfs. So this is not really shoe parts, you know,
15 shoe elements that -- that he's referring to.

16 So I just, you know, included this -- that
17 paragraph -- that sentence from that -- from this
18 page just as an example. But again, that does not
19 really represent the shoe elements.

20 Q. Okay.

21 A. So just to -- to emphasize that, you know,
22 they can be simultaneously produced, you know, side
23 by side, close to each other, and it can have a gap
24 between them, as I said. And that fringe is a gap.
25 So that was the purpose of that -- that sentence, the

1 quotation from -- from this page in my report.

2 Q. Okay. So does this discussion in Spencer,
3 though, address any waste material in the knitting
4 process?

5 A. You know, the fringe -- depending on the
6 length of the fringe, that may be a waste area. So
7 some of the fringe may be cut and then seamed after
8 that. So it -- it is not specified here. But it
9 does not exclude that.

10 And, again, side by side does not mean that
11 they are touching each other.

12 Q. Okay. Let's -- I'm going to introduce
13 Exhibit 1022, which is Nishida.

14 (Exhibit 1022 was marked for
15 identification.)

16 BY MR. SEBBA:

17 Q. Let me know when you pull that up.

18 A. Yes, I am there.

19 Q. Okay. Okay. So have you reviewed
20 Exhibit 1022?

21 A. Yes.

22 Q. And what is Exhibit 1022?

23 A. This is a patent by Nishida, U.S. Patent,
24 with the title "PROCESS FOR PRODUCING A SHOE-SHAPED
25 PART FROM A WEB OF MATERIAL AND RESULTING SHOE-SHAPED

1 PART."

2 Q. Okay. If I refer to Exhibit 22 -- excuse
3 me.

4 If I refer to Exhibit 1022 as Nishida, will
5 you know what I'm referring to?

6 A. Yes.

7 Q. Okay. Where in Nishida is there a
8 discussion of the timing of knitting each piece?

9 MR. LINDSAY: Objection. Form.

10 THE WITNESS: Timing of the knitting each
11 piece?

12 BY MR. SEBBA:

13 Q. Sure. Let's step -- you know what, let me
14 clarify that. Thank you.

15 So let's look at Figure 2 of Nishida.

16 A. Okay.

17 Q. Are you there?

18 A. Almost.

19 Q. Okay.

20 A. Yes.

21 Q. Okay. What does Figure 2 show us?

22 A. Figure 2 shows a surrounding fabric in -- in
23 the -- in the shape of almost a square and then
24 several pieces -- at least two complete piece, and
25 then three partially shown pieces of shoe upper woven

1 together -- I'm -- I'm sorry, knitted together. Not
2 woven. Sorry.

3 But, you know, could be woven too.

4 Q. And so where in Nishida is there a
5 discussion of when the square piece is knitted in --
6 of the timing of when the square piece is knitted
7 compared to one of the shoe uppers?

8 A. Yes. It is -- by default, again, when you
9 are making a -- a fabric, a surrounding fabric with
10 the parts in it, then you are knitting these pieces
11 all together simultaneously timewise. So -- so
12 that's where the time is mentioned or indicated in
13 manufacturing of these -- these pieces.

14 Q. So you said "by default"; is that right?

15 A. That's right. I mean, for a POSITA who
16 knows the process, it is -- it is obvious that these
17 pieces are together -- are knitted together
18 simultaneously.

19 Q. Okay. And what is your basis of an
20 understanding of what a POSITA who would know the
21 process is?

22 A. Well, a personal -- person -- person of
23 ordinary skill in the art would know that -- would
24 know how the knitting machines work. So therefore,
25 they produce the fabric, again, as a line moving up

1 across the whole width. And all those machines are,
2 by the way, standard machines, commercially available
3 in the market.

4 So, you know, the machines that are
5 mentioned in '749 patent or Nishida or Orei patents,
6 anybody could go and buy, you know, from those
7 textile machinery shows that I mentioned, you know,
8 watch -- see the machine, run the machine, and then,
9 you know, purchase the machine, and then install it.
10 And then the people -- you know, the engineers from
11 the manufacturers of those machines, they come
12 install the machine, and then they start up, and they
13 train the people in the textile plant how to use the
14 machine, how to program it, how to make fabrics. And
15 then they leave. So it is, you know, nothing new in
16 these patents about those machines. They are all
17 commercially available machines.

18 So, you know, for '749, for example, they
19 simply purchase the machine and, you know, use it to
20 make those fabrics. And those fabrics, you know, not
21 specific to those machines. Those machines are so --
22 so sophisticated, so very subtle, that you can make
23 any -- any piece that pretty much you think of. And
24 that is the beauty of textile engineering, by the
25 way. You know, these are flexible structures with

1 different geometries, and the machines are so
2 advanced, so technologically advanced, computer
3 controlled and everything, that you can make those --
4 anybody can make those pieces. Just a matter of, you
5 know, buying the machine, installing it, and then,
6 you know, having help from the manufacturer to
7 install it, run it, train the people. And you can
8 pretty much make any type of shape.

9 Q. Okay. So you said -- I just want to break
10 it down a little to make sure I understand.

11 So the -- your basis of an understanding of
12 what a skilled artisan would know about the process
13 is based on how commercial machines work; is that
14 right?

15 A. Yes. Partly. Yes, part of it, yes, to know
16 how those commercial machines work.

17 Q. Okay. And that's partly based on the
18 commercial machines that are discussed in the '749
19 patent?

20 A. That is right. There is nothing new in '749
21 patent, whether it is material, fiber, yarn types, or
22 machine. You know, those machines were available at
23 that time, long before that time, or the fabric
24 structures. There is nothing -- nothing new really
25 in '749 patent.

1 Q. Okay. So you relied on the disclosure of
2 the '749 patent, in part, to understand what a
3 skilled artisan would have known; is that right?

4 A. No, no, I didn't say that.

5 You know, again, a POSITA at that time,
6 2004, would know those machines, that they are
7 available, offered by -- you know, by the
8 manufacturers, commercially available. And -- and
9 you don't have to make any modification in those
10 machines. Once you purchase them, as I said, you
11 know, the engineers come from the manufacturer of
12 those machines. And then they install it. They
13 start it up and then train the people of the plant
14 how to use those machines, how to code -- you know,
15 how -- how to program them. And then -- and then,
16 that's it.

17 I mean, you don't have to read that patent
18 because there is nothing new in the patent, the '749
19 patent, to know those things.

20 And if you look at the exhibits that I
21 listed, the Karl Mayer, Liba, and then texted
22 information -- information, and then there are others
23 too, all those structures are shown in those -- in
24 those company brochures, machine brochures in those
25 documents, in those journal articles. You know,

1 again, there is nothing new in '749 patent that was
2 not known in 2004.

3 Q. Okay. Is there any other -- do you have any
4 other basis for understanding what a skilled artisan
5 would know about Nishida?

6 MR. LINDSAY: Objection. Form.

7 THE WITNESS: No. Again, I mean, you know,
8 Nishida -- also the machines that -- that are
9 mentioned, the process that is mentioned in Nishida,
10 that's also, again, open to everybody, you know, to
11 purchase those machines and then make those parts.

12 BY MR. SEBBA:

13 Q. And how -- how are you aware of what
14 machines were available?

15 A. Well, they are mentioned in -- in the
16 patents, except Nishida does not -- let me see. It
17 does not probably mention the type of the machine
18 that -- that closely. But, you know, '749 is
19 mentioned, circulating machines and -- and jacquard
20 double bar machines, so -- so it's really a -- I
21 mean, nothing new with those machines.

22 And that -- Nishida, that machine can be --
23 can be made, again, with knitting machines, warp
24 knitting, weft knitting machines. And I believe
25 Nishida made mention of weaving also is possible.

1 Weaving machines -- to use weaving machines is also
2 possible to make those structures, which is -- which
3 correct, and also embroidery, also another method to
4 make the parts in Nishida.

5 But I think he is concentrating on knitting
6 in -- in his patent.

7 Q. Okay. So how are you able to determine what
8 a skilled artisan would have been aware of in 2004?

9 A. Well, I -- I think a -- a POSITA in 2004, if
10 he is -- or she is in that field, knitting field for
11 example, would know the knitting machines, the -- the
12 state-of-the-art knitting machines that are available
13 in the commercial market, whether they are weft
14 knitting machines and then variations of weft
15 knitting machines and warp knitting machines and
16 their variations.

17 So I mean, as I said, every two years, there
18 was a textile machinery show in the U.S. and then
19 in -- in Europe. So a POSITA, if he or -- or she
20 wants to follow the latest developments, would visit
21 those machinery shows and -- and learn the latest
22 developments, whether that person or POSITA is
23 working in a -- in a company, in a mill, textile mill
24 to improve their processes.

25 Because, you know, with the 1980s, with the

1 computer revolution, those machines developed so
2 fast, so well, so sophisticated. So it would be, you
3 know, expected for a POSITA to visit those textile
4 machinery shows every three years and then learn
5 about the latest developments.

6 Q. So I think you're telling me that a -- a
7 POSITA would -- would know about the knitting
8 machines.

9 And I'm asking: How are you able to
10 determine that to be the case? How are you --

11 A. Well --

12 Q. -- able to determine what a POSITA would
13 know?

14 A. Well, the name says person of ordinary skill
15 in the arts.

16 So in this case, the art is knitting, and --
17 and a person with skills in that -- in knitting would
18 know what kind of machinery is used to make knitted
19 fabrics.

20 Q. And is that based on your experience?

21 A. Yeah. For my experience, as I said, I
22 visited many of the textile machinery shows. And
23 also as a professor, I am teaching those courses. As
24 I said, I just finished teaching that class in the --
25 in the fall. I submitted the final grades last week.

1 So, you know, as -- as a -- an academician,
2 yes, I have to follow the latest developments in my
3 field.

4 Q. Is it -- is your understanding what a
5 skilled artisan would know based on anything other
6 than your experience?

7 A. Again, there is a definition of POSITA in my
8 declaration. So, you know, if a person has those
9 qualifications, then yes, that person -- person would
10 know, you know, what machines are used at the time of
11 those patents, what -- what machines were available,
12 yes.

13 Q. Okay. And that understanding is based, in
14 part, on your teaching; right? Is that what you
15 said?

16 A. Not necessarily teaching only, because there
17 are people that -- you know, that are -- people that
18 are experts out there working in those companies, in
19 those mills, textile mills, manufacturing mills,
20 plants. And they know -- they know the trade. They
21 know the business. They know the machines. They
22 know how to run them, what to produce in those
23 machines.

24 Again, these are all commercially available
25 machines. The textile companies that purchase these

1 machines, they don't have any know-how to make any
2 modification on those machines because those machines
3 are so sophisticated.

4 In fact, I tell my students in that class
5 that air-jet weaving machine is the most
6 sophisticated machine that exists today. In fact,
7 more -- more sophisticated than the, you know, rocket
8 science. And, you know, I have my reasons to -- to
9 say that. So these are extremely complicated,
10 sophisticated machines that when a company purchases
11 that -- those machines, really, that company --
12 purchaser does not have any -- does not have enough
13 know-how how to make any modification in those
14 machines unless, you know, the manufacturer comes and
15 helps to program the machine.

16 And I don't think that they -- they do any
17 physical modification to the machine. I doubt it.
18 But programming, yeah, you know, anybody can make
19 programming -- different -- different programming to
20 different -- to produce different parts.

21 But again, I mean, anybody can purchase any
22 of these machines -- well, could purchase any of
23 these machines at the time in 2004, and then -- and
24 with the help the machine manufacturer to start out
25 the machine, they could make any of those parts.

1 Q. Okay. So let's go back to the original
2 question, which is: In Figure 2 of Nishida, is --
3 looking at Figure 2 of Nishida, where in Nishida is
4 there a discussion of the timing of when the
5 different components shown in Figure 2 are
6 manufactured?

7 A. There is no need to -- to really discuss,
8 you know, in a patent, you know, the -- the timing.
9 And -- because it -- again, for a person that knows a
10 trade, this piece -- that square piece is made as one
11 single piece with different elements in it.

12 So, you know, the -- if you start with the
13 bottom line there, and that is -- in a knitting
14 machine, that is the needle bed, needle bar, so the
15 needles are there and then the yarn, many yarns. You
16 know, if this is, let's say, 1-meter-wide fabric,
17 there are thousands of yarns in vertical direction,
18 you know, coming onto the -- the needles on the -- on
19 the bar, and then the fabric is -- is formed there.
20 And then the whole width -- that formation of the
21 fabric continues all the way up to the top line, you
22 know, of the -- of the -- of the box.

23 So the timing in terms of, you know, actual
24 minutes, seconds, et cetera, that depends on the
25 speed of the machine.

1 But I guess that was not discussed. No need
2 to discuss, I guess, in a patent like that. But the
3 timing -- you know, actual timing, production time
4 depends on the -- the type of the machine, speed of
5 the machine.

6 Q. Okay. So Nishida does not specifically
7 discuss when different components of the material
8 shown in Figure 2 are manufactured; is that right?

9 A. Well, once you start making this fabric --
10 let's say you start at the bottom line of the -- of
11 that square, now -- you know, on the right side, now
12 there are two legs of one element. So -- and then on
13 the left side, the -- again, there are two legs. And
14 then so once you finish the legs on the right side,
15 then you go into the surrounding fabric. But on the
16 left side the part continues to -- to be built. So
17 it is a line that is moving, moving line, and the --
18 the -- the parts formed that way.

19 So -- and that timing depends on the machine
20 speed. And also the design of the -- of the fabric.
21 If you have, you know, more open structure, of course
22 it goes faster. If it is more dense structure, it
23 goes slower. So -- so the timing is, again, machine
24 specific.

25 But all those parts, including the

1 surrounding fabric, are produced simultaneously along
2 a moving line.

3 Q. Okay. So where in Nishida does it disclose
4 that they're produced simultaneously?

5 A. Well, there is no other way to -- to make --
6 to make these fabrics. There is no other way in
7 knitting. Again, you know, Karl Mayer and Liba
8 pictures show that, you know, it is a fabric of a
9 certain fixed width. And then it is -- you know,
10 with parallel lines. It is produced that way. And
11 then whatever you make inside as different elements,
12 it is with the surrounding fabric. And that
13 surrounding fabric is shown as, you know, one here in
14 the picture.

15 Q. Okay. So your understanding that Nishida
16 produces everything shown in Figure 2 simultaneously
17 is based on your knowledge?

18 A. Yes, yes.

19 Q. Okay.

20 A. Based on the -- based on my knowledge how
21 those machine works. I know how those machine works,
22 and there is no other way that those pieces would be
23 produced not simultaneously.

24 Q. Okay. But Nishida doesn't specifically
25 state that they're produced simultaneously; is that

1 right?

2 A. I -- I don't -- well, actually, it does, on
3 page -- I'm sorry, yeah. Column 5, line 35, you
4 know, it says "related tongues ... are produced
5 simultaneously with a layout 2 the same web of
6 material 1."

7 Q. Okay. So that's discussing Figure 4; is
8 that right?

9 A. Yes, that is discussing Figure 4.

10 Q. Okay.

11 A. But that is -- that is true for all the
12 figures: Figure 4, Figure 5, and then Figures 2 and
13 Figure 1. Yes --

14 Q. Okay.

15 A. -- they are applied to all of them.

16 Q. Okay. And what -- what that -- what you
17 just referred to in Column 5 --

18 A. Line 35.

19 Q. Line 35. Thank you.

20 A. Thirty-four. I guess starts with 34.

21 Q. Column 5, line -- okay. So what you just
22 referred to on Column 5, line 34 to 36 --

23 A. Yes.

24 Q. -- is referring to tongues being produced
25 simultaneously to the rest of the layout or the rest

1 of the shoe upper; is that right?

2 A. Yes. If the tongue is produced
3 simultaneously, the other parts are also produced
4 simultaneously.

5 Q. Okay. But is that referring to being
6 produced at the same time as the backing material?

7 A. Yes.

8 Q. And where do you see that?

9 A. Again, that is, you know, trick of the
10 trade. I mean, if you know how those machines work
11 and how those fabrics are produced, there is no other
12 way to produce -- to produce those fabrics and with
13 those pieces in -- inside.

14 Q. Okay. So again, that's based on your
15 understanding, not based on what's disclosed in
16 Nishida.

17 A. Well, he is saying simultaneously. So I
18 think he's disclosing it for a POSITA. A POSITA
19 would understand that.

20 Q. But when he says simultaneously, he's
21 referring to the tongues and the uppers; is that
22 right?

23 A. Well, again, you cannot produce surroundings
24 without, you know -- you know, not being
25 simultaneous.

1 So, you know, if you are producing the
2 tongue, you know, simultaneously with the surrounding
3 material 1, that means that you are producing all the
4 parts with the surrounding at the same time.

5 Q. Does that sentence in Column 5, lines 35 to
6 36, say that the tongue is being produced at the same
7 time as material 1?

8 A. Yeah. It says "related tongues 40 are
9 produced simultaneously with a layout 2 on same web
10 of material 1."

11 And material 1 is surrounding fabric.

12 Q. Right. So it says that the "related tongues
13 40 are produced simultaneously with a layout 2"; is
14 that right?

15 A. Yeah. Layout -- figure -- yeah, layout is
16 just -- let me find that.

17 That is Figure 4. Yeah, layout is actually
18 in Figure 1. You know, that is -- that -- that --
19 I'm sorry, in Figure 2. That is layout 2. So there
20 are -- there is layout 3, and then there are portions
21 of the other layouts. So, you know, everything in
22 that -- in that piece 1 is -- is produced
23 simultaneously along the line. And that line is the
24 needle bar that houses the needles. So all the yarns
25 come to that bar. You know, that's a straight bar.

1 And then the fabric is produced as a line. And
2 then -- so as we move up, then those elements start
3 showing up in the fabric. And then when you get to
4 the top, then you have all those elements shown in
5 the fabric, in the surrounding fabric.

6 Q. Okay. So going back to Column 5, lines 34
7 to 36, that sentence says that the "related tongues
8 40 are produced simultaneously with a layout 2"; is
9 that right?

10 A. Yes.

11 Q. Okay. And then it says that those -- both
12 the tongues and the layout are produced on a "web of
13 material 1"; is that right?

14 A. Yes.

15 Q. It --

16 A. "Same web of material 1."

17 Q. Yeah. But the simultaneously does not refer
18 to web of material 1; is that right?

19 A. No. It refers to, I think. It says
20 "simultaneously with a layout 2 on same web of
21 material 1."

22 Q. So if -- the tongues in the layout are being
23 produced on the material 1, web of material 1.

24 A. Yes.

25 Q. Is that right?

1 A. Yes.

2 Q. So -- so it -- there's nowhere that says the
3 tongues are being produced simultaneously to the web
4 of material 1; is that right?

5 A. No, I would disagree with that.

6 Again, by default, that -- all the elements
7 in that one -- material 1 are produced, has to be
8 produced, must be produced simultaneously because the
9 machine does not work in -- in any other way.

10 Q. Okay. So your basis for that is based -- is
11 your understanding of the knitting machine, not the
12 explicit statement in Nishida; is that right?

13 A. No, not --

14 MR. LINDSAY: Objection. Form.

15 THE WITNESS: I'm sorry.

16 Not necessarily. I mean, I -- I think to
17 me, you know, or to a POSITA, it is very clear that
18 they are produced simultaneously.

19 In fact, it is so basic that -- I mean, the
20 patent, you know, owner probably did not feel to, you
21 know, elaborate on that because that's -- that's
22 given.

23 BY MR. SEBBA:

24 Q. So other than this excerpt on Column 5,
25 lines 34 to 36, is it your view that Nishida anywhere

1 else discloses that the shoe uppers shown in Figure 2
2 layout 2 are produced simultaneously?

3 A. I don't know if it specifies anywhere else.
4 But again, I mean, to me, it is really obvious. To a
5 POSITA it is very obvious. And he mentions in -- in
6 those two lines, in that sentence. That is more than
7 enough for a POSITA to understand that they are
8 simultaneously manufactured.

9 Q. Okay. So it's based -- so your
10 understanding that layout 2 is manufactured
11 simultaneously to the rest of what's shown in
12 Figure 2 is based on your -- your experience and this
13 one excerpt on Column 5, lines 34 to 36; is that
14 right?

15 A. Yes.

16 Q. Now, let's look at Figure 2 again.
17 Well, let's look at -- yeah, let's look at
18 Figure 2.

19 Okay. Do you see in the middle it says "1"?

20 A. Yes.

21 Q. Okay. What's your understanding of what 1
22 represents?

23 A. That 1 is the surrounding fabric.

24 Q. Okay. And then do you see where it says
25 "4"?

1 A. Yes.

2 Q. What's your understanding of what 4 is?

3 A. Four is -- can be 1, if it is a knitted
4 fabric. And if -- if it is woven fabric, can be
5 another layer behind 1.

6 And so it is -- depending on the
7 manufacturing method, it is, you know, surrounding
8 fabric in -- in case of knitting. Or if you are
9 making a -- a double-layer woven fabric, then that
10 would be the other layer which is called base or
11 something in the patent.

12 Q. Okay. And then what's your understanding
13 of -- I'm sorry.

14 On the top right, do you see that there's a
15 "1.1"?

16 A. Yes.

17 Q. Okay. What's your understanding of what 1.1
18 is?

19 A. 1.1 is a -- it says that, you know, position
20 No. 1.1 in -- in Column 4, line 63.

21 Q. Okay.

22 A. That is the unfinished surface areas which
23 refers to, again, the surrounding fabric. So like 1.

24 Q. Okay. So if 1.1 is the surrounding fabric
25 and -- I'm sorry. Tell me again what 4 was.

1 A. Four could refer to a backing. I think it
2 is stated as a backing, yes, in Column 3, line 13.

3 Q. Mm-hmm.

4 A. It says backing. And that backing can be
5 another layer. You know, if it is a woven fabric, it
6 may be two layers, for example.

7 Q. Okay.

8 A. If it is an embroidery, you know, it's the
9 same as 4 and 1 or 1.1. Or if it is knitting, also
10 can be the same.

11 And that 4 is mentioned only once in the
12 whole patent and shown only in figure -- in -- only
13 in one figure, by the way. That figure is 2. It is
14 not shown in the other figures.

15 Because, you know, Nishida is covering
16 weaving, knitting, and embroidery. So I guess it
17 wants to keep all the options open, that's why he
18 mentions that No. 4.

19 Q. And so where in Nishida does it disclose
20 that this is made on a knitting machine like the ones
21 you've been discussing today?

22 A. Yes. It is -- it is in Column 3, line --
23 starting with line 6:

24 "In FIGS. 1 and 2, a web of material is
25 identified by 1, and is produced by a

1 conventional textile process" --

2 As I said, you know, nothing new in these
3 patents. They have all commercial textile processes.

4 -- "tier example" --

5 That tier should be, I think, 4, for
6 example. I think there is a typo there.

7 -- "by weaving and/or knitting and/or"
8 embroidery -- "embroidering."

9 So he's mentioning three -- three different
10 manufacturing processes for these structures.

11 Q. Okay. Why do you think tier -- or why do
12 you think tier is an error?

13 A. I believe I explain it in my -- in my
14 declaration.

15 Let me find that one.

16 And I quoted that in paragraph 217, but I
17 think -- it's tier, but I think there should be --
18 there should be one more place. Okay.

19 Yeah, in paragraph 210:

20 "Nishida discloses a method of
21 manufacturing an article of footwear. See
22 supra For example, Nishida describes,
23 with reference to FIGS. 1-2, that 'a web of
24 material is identified by 1, and is produced
25 by a conventional textile process, [for]

1 example, by weaving and ... knitting
2 The web of material 1 can be provided with a
3 single or with a plurality of layouts 2 of
4 the shape of a shoe upper 3, as it is
5 represented from the side, for example, in
6 FIG. 3."

7 So -- and then it continues.

8 Yeah. I -- I mean, I wrote that as, you
9 know, 4 -- 4 rather than tier, because tier -- tier
10 example doesn't make sense from a -- you know,
11 grammar point of view. So that is -- that's, you
12 know, another reason that it should be 4 example, not
13 tier example.

14 Although tier is as a word, maybe it escaped
15 a spelling check because it is a correct word. But I
16 think it is misused there.

17 Q. Okay. And just to step back, so why do
18 you -- can you explain why you think tier is there in
19 error?

20 A. Because it doesn't make sense -- it doesn't
21 make sense to -- you know, to use tier example. And
22 then after that, you use -- you give examples of
23 manufacturing processes, three different
24 manufacturing processes.

25 So tier example doesn't make sense, I mean,

1 from a linguistic point of view. So I think it's a
2 typo. And then I -- I corrected that in my
3 declaration when I was quoting him.

4 Q. Let's go back to Figure 2 of Nishida.

5 A. Yes.

6 Q. Okay. So we discussed that 4 represents a
7 backing; is that right?

8 A. It is referred -- referred to as backing
9 only once in the -- in the patent, yes.

10 Q. So do you agree that 4 is a backing?

11 A. It could be a backing if you are making, you
12 know, two layers of fabrics with a weaving process,
13 for example.

14 Q. Could it be something else?

15 A. For embroidery, that would be a backing,
16 too, that could be used for embroidery as well.

17 Q. So could 4 be anything other than a backing?

18 A. For -- for knitting in this case, it is
19 equal to 1 or 1.1.

20 Q. Can you explain to me how 4 is equal to 1 or
21 1.1?

22 A. I mean, you know, if you are making this as
23 a knit -- knitted structure, as we explained, you are
24 producing the surrounding fabric. And -- and all
25 those elements together simultaneously as one piece.

1 So that is -- that is knitting. But if you are
2 making woven fabric and two-layer or multilayer woven
3 fabric and, you know, weaving is mentioned as a
4 possible method. So you could have a base fabric
5 or -- or, you know, that -- another fabric, another
6 layer. So 1 would be one layer and then 4 would be a
7 backing fabric, another layer behind. So -- so that
8 would refer to weaving process.

9 Q. Okay. So let's focus on knitting for a
10 moment.

11 If you are knitting, what is shown in
12 Figure 2, what can 4 be other than a backing?

13 A. It -- it can be 1, same as 1.

14 Q. And when you say "same as 1," what do you
15 mean by that?

16 A. So 1 and 4 would be referring to the same
17 piece, same fabric.

18 Q. And -- and which piece or fabric would that
19 be?

20 A. That's shown with the square borders.

21 Q. So is it the full piece, or is it the piece
22 in between the layouts?

23 A. Is it the piece between the layouts?

24 So layouts are surrounded by 1 or 4 in
25 knitting. But 1 and 4 does not go under the layouts

1 in -- in knitting.

2 Q. Okay. And how do you know that 4 doesn't go
3 underneath the layouts?

4 A. Again, in knitting, that's not how the
5 fabric is formed, manufactured.

6 So, you know, I have a good picture to show
7 you if you'd -- if you don't mind --

8 Q. Sure.

9 A. -- in one of the exhibits.
10 Let's see. I think 1027, I believe.

11 No, not that one. That's the 1032. It's
12 one of those. One of those exhibits.

13 Yeah. If you go to -- I'm still at 10 --
14 1033, and then page -- page 17 of the PDF. An
15 example of that kind of fabric is shown. This is a
16 work man structure. The blue fabric on the most
17 left, you know, that is the surrounding fabric or,
18 you know, No. 1 or 4. And then there are different
19 elements made on that -- on that piece.

20 So this is similar to Nishida or Orei or
21 other similar patents.

22 Q. Okay. So the reason that you think
23 backing 4 does not go under layouts 2 is your
24 understanding of how the knitting machines work; is
25 that right?

1 A. That's right. That's part of it, yes.

2 Q. What else is there, then?

3 A. I mean, my background, you know, my
4 materials I teach in classes and my experience.

5 Q. Okay. Can you identify any specific
6 documents or portions of Nishida that you rely on to
7 support your understanding that backing 4 does not go
8 underneath layout 2?

9 A. Well, again, Nishida is trying to specify
10 three different manufacturing methods for -- for
11 those -- for these fabrics: knitting, weaving, and
12 embroidery.

13 So, you know, by default, embroidery would
14 have -- would have those elements going over the
15 surrounding fabric. So that would be kind of a two
16 layer there. So you have a fabric already made, and
17 then on top of that, you are putting those elements
18 with that embroidering process.

19 So I think that's why Nishida, you know, had
20 that 4 in that picture, again, to keep all the
21 options open because he's mentioning three different
22 manufacturing methods for -- for different kind of
23 fabrics.

24 Q. Does Nishida specify that backing 4 is only
25 there for embroidery?

1 A. I don't think so. I don't recall that. But
2 again, that is -- for a POSITA, that is well
3 understood because that's how embroidery fabrics are
4 made, embroidery structures are made.

5 So you have a different fabric produced
6 first on a separate process, and then on top of that,
7 you do embroidery. So the pieces go on top of each
8 other.

9 But he is not really emphasizing embroidery
10 in his patent. He is really emphasizing knitting.

11 Q. Okay. So despite not emphasizing knitting,
12 he still disclosed a backing 4 which would only --
13 which -- apologize.

14 So despite not emphasizing embroidery, he
15 still disclosed a backing 4 which would only be
16 relevant to an embroidery embodiment?

17 A. Embroidery, and also it is possible for
18 weaving too.

19 Q. Okay. So it's your view that backing 4 does
20 not go underneath layouts 2 in Figure 2; is that
21 right?

22 A. That's right. For knitting, it does not.

23 Q. And how do you know that is what a skilled
24 artisan would know in 2004?

25 A. Again, the machines that are used to make

1 those kind of fabrics work in a -- in a certain way
2 that those -- those elements are produced, you know,
3 side by side, next to each other, touching each other
4 with the surrounding fabric.

5 Q. Okay. That doesn't quite answer my
6 question, though.

7 How do you gain an understanding of what a
8 skilled artisan would know in 2004? How do you know
9 that a skilled artisan would understand that
10 backing 4 would not go underneath layout 2 in 2004?

11 A. Well, yeah, in those pictures that I showed
12 from -- showed you or I mentioned in that -- in that
13 exhibit from Karl Mayer, for example, they predate
14 2004. And -- and, you know, those elements are --
15 are produced, again, with the surrounding fabric
16 touching each other in those machines. And a POSITA
17 would know -- would know that.

18 Q. How does the image you showed in
19 Exhibit 1033, page 17, show that a backing would not
20 go underneath a layout as disclosed in Nishida?

21 A. Well, there is no need for a backing in that
22 structure. It is -- it -- it would be based on
23 material, you know. And there is no need to have a
24 backing for those type of structures. And there are,
25 you know, pictures shown in that -- was it 1032 or

1 1033? 1033. Exhibit 1033, page 17. Not 1032.

2 Q. Okay. So that doesn't quite answer the
3 question, though.

4 So you're saying in -- in the picture in
5 Exhibit 1033 on page 17, there's no backing.

6 A. Yes.

7 Q. Okay.

8 A. There is no backing.

9 Q. How does the picture on Exhibit 1033,
10 page 17, suggest that there would be no -- the
11 backing would not go underneath the layout in
12 Figure 2 of Nishida?

13 A. Well, there are other -- other structures
14 that show that, you know, there are -- there may be a
15 backing or two-layer structure, and that they are
16 shown -- let me see -- well, they are shown in --
17 in -- I don't know where right now, but -- so
18 that's -- this -- this structure is not like that on
19 page 17. It is just one layer, single-layer
20 structure.

21 Q. Okay. So what is your -- what is your
22 understanding of how a skilled artisan would
23 understand -- excuse me. Let me start that over.

24 What do you base your understanding that a
25 skilled artisan in 2004 would not consider there to

1 be a backing 4 underneath layout 2 in Nishida?

2 A. Because there is no need for that -- you
3 know, Nishida does not say -- except for that one 4
4 on that Figure 2, does not say that, you know, there
5 is two-layer fabric structure. And so that's based
6 on the patent specification.

7 Q. But the patent specification says that there
8 is a backing 4; is that right?

9 A. Yeah. But it is -- again, he also mentions
10 a -- you know, embroidery and weaving, so it may be
11 for those structures.

12 Q. Okay. Can you identify any --

13 A. Can we --

14 Q. I'm sorry. Go ahead.

15 A. I'm sorry. Before you ask the question, I
16 know I -- I cannot leave after that, can we take a --
17 a lunch break now?

18 MR. SEBBA: Sure. That's fine.

19 THE WITNESS: Thank you.

20 MR. LINDSAY: Okay. How long? Well, let's
21 go off the air first.

22 VIDEOGRAPHER: We're off -- we're off the
23 record at 12:03 p.m.

24 (Lunch recess.)

25 VIDEOGRAPHER: This is the beginning of

1 Media File No. 4. We are back on the record at
2 12:40 p.m.

3 BY MR. SEBBA:

4 Q. Welcome back, Dr. Adanur.

5 A. Thank you.

6 Q. Did you talk to anyone during the lunch
7 break?

8 A. Except my wife, nobody.

9 Q. Okay. Did you text with anyone?

10 A. No.

11 Q. Or communicate with anyone other than your
12 wife during the break?

13 A. No.

14 Q. All right. We were discussing Nishida, and
15 specifically, Figure 2 of Nishida.

16 So I think we were -- I believe you've --
17 you stated that backing 4 in Figure 2 of Nishida does
18 not extend underneath layout 2 in Figure 2 of
19 Nishida.

20 Is that your view?

21 A. For knitting, yes.

22 Q. Okay.

23 A. It is -- it is my view.

24 Q. Okay. And how do you know that a skilled
25 artisan in 2004 would not consider backing 4 to

1 extend under layout 2 in Figure 2 of Nishida for
2 knitting?

3 A. For knitting, that would be based on
4 material, to use extra material under Element 2 for
5 example. Element 2 is stronger than Figure 1 or
6 Element 1, and therefore, there is no need to use
7 extra material on Figure 2.

8 Q. Okay. So it's your view that in 2004, a
9 skilled artisan would not see backing 4 to extend
10 underneath layout 2 because that would use extra
11 material; is that right?

12 A. Yes. And that would be a waste, waste of
13 money.

14 Q. Okay. So a skilled artisan would not pursue
15 a structure that included waste; is that right?

16 A. That's right. That -- that is based on
17 money, material.

18 Q. Okay. And how do you know that a skilled
19 artisan in 2004 would consider extending the backing
20 for underneath layout 2 to be a waste?

21 A. Well, again, all the machines were available
22 at that time to produce these structures and,
23 therefore, a POSITA -- POSITA also would understand
24 the requirements of these fabrics to be used in -- in
25 the shoes or any other application that he is

1 involved or she is involved in. So therefore, you
2 know, that person would -- would think that that's --
3 that would not be necessary.

4 Q. Okay. I -- I -- that's -- I don't -- that's
5 not quite the question I'm asking.

6 So what I'm wondering is: How are you able
7 to put yourselves -- excuse me, to put yourself in
8 the shoes of a skilled artisan in 2004?

9 A. Well, I would look at the technology
10 available in 2004 and what kind of fabrics -- fabrics
11 could be produced on those machines. And it is well
12 known that, you know, if you use more than what you
13 need in terms of material or time, that would cost
14 more. And -- and, you know, the -- the industry is
15 very competitive. So that would not help, you know,
16 for the -- for the market share. So those are the
17 reasons.

18 Q. Okay. And are you relying on any documents
19 from 2004 that -- for you to understand what a
20 skilled artisan would have wanted at that time?

21 A. I'm relying on my knowledge and experience.

22 Q. Okay. Are you relying on anything other
23 than your knowledge and experience?

24 A. Not other than what I mentioned.

25 Q. What do you mean when you say what you

1 "mentioned"?

2 A. I mean, we've been talking about this
3 things, so what I mentioned, I rely on those, but
4 nothing new.

5 Q. Okay.

6 A. Also, you know, I'm -- well, Nishida also
7 mentions another patent, Günther's, and so that --
8 you know, 4, No. 4 may come also from that Günther's
9 invention, which was, I think, before the second
10 World War. It was very old.

11 Q. When you say 4 may come from Günther's
12 invention, what do you mean?

13 A. I mean, Nishida has stated he is improving
14 on Günther's, and -- and I believe Günther's, you
15 know, mentioned that there may be a backing in -- in
16 his structure. So that -- that may be related. But
17 for knitting, no. It's -- Günther's is more like
18 weaving structure.

19 Q. So you're saying Günther is not -- does not
20 disclose knitting?

21 A. It could --

22 MR. LINDSAY: Objection. Misstates
23 testimony.

24 THE WITNESS: I'm sorry.

25 MR. LINDSAY: Go ahead.

1 THE WITNESS: It could be knitting as well.
2 There -- you know, there are structures like that,
3 knitting -- knitted structures, but also, it could be
4 weaving.

5 BY MR. SEBBA:

6 Q. Okay. So you said "Günther is more like a
7 weaving structure."

8 What did you mean by that?

9 A. Günther's, I think that structure can be
10 weaving and -- and -- and knitting. But he talks
11 about weaving process in the patent as well. And
12 the -- so, you know, he is also talking about
13 knitting and weaving. And Nishida is also talking
14 about knitting and weaving, so -- so that No. 4 may
15 come from Günther's, you know, idea.

16 Q. When you say "No. 4," do you mean backing 4
17 in Figure 2?

18 A. Yes.

19 Q. Okay. Okay. Let's look at Nishida
20 Column 4, line 47.

21 A. Yes.

22 Q. All right. The sentence starting on line 47
23 reads:

24 "The advantages of the previously slide
25 process according to the invention can be

1 seen especially in the fact that, with a
2 fully developed loom, up to 7 different
3 textile fibers or yarns, and the same number
4 of colors, can be put in, especially woven
5 in, the web of material in one operation."

6 Do you see that?

7 A. Yes.

8 Q. So that's -- that excerpt is focused on
9 weaving; is that right?

10 A. That's right.

11 Q. Okay. And weaving is different than
12 knitting?

13 A. Yes. The machines are different. The
14 process is different. The fabric properties are
15 different.

16 Q. Okay. Let's take a look at Günther's, which
17 I'll pull up in just a moment. All right. Günther's
18 is Exhibit 1023.

19 (Exhibit 1023 was marked for
20 identification.)

21 BY MR. SEBBA:

22 Q. Let me know when you have that.

23 A. Yes, I do. Sorry.

24 Q. Okay. Okay. Excuse me. I've lost it. Too
25 many PDFs open.

1 All right. So let's look at Figure 2 --
2 Figures 1 and 2 of Günther.

3 A. Okay.

4 Q. Okay. On a high level, what is being shown
5 in Figures 1 and 2 of Günther?

6 A. This is a fabric for the shoe upper. Again,
7 this is 1932, developed in 1932. Quite advanced
8 technology at that time, I guess. So basically, it
9 is showing a fabric with two surfaces, and then the
10 distance between two surfaces can vary -- is varied.
11 And -- and in between also can be -- can be filled
12 with -- with the materials, with -- with yarns, more
13 yarns. And also Figure 2 shows elements, textile
14 elements that are made with the surrounding fabric in
15 this configuration.

16 Q. Okay. So what -- you said something about a
17 backing earlier.

18 What is the backing on Günther?

19 A. Yeah. If -- if you look at the Figure 1, on
20 the very left side there is Roman numeral I, and that
21 is -- it is a two-layer fabric. So one layer is
22 backing, and the other one is the front layer. And
23 those layers continue all the way in Figure 1, again,
24 with a distance varying between them. And that
25 distance may be filled with the -- with extra yarns.

1 Q. Okay. So now let's go back to Nishida.

2 A. Okay.

3 Q. Okay. In Column 1 of Nishida, around --
4 starting at line 19, there's a sentence that says "A
5 process according."

6 Do you see that?

7 A. Yes.

8 Q. And that reads:

9 "A process according to this general
10 type is known from German Patent No. 627 878.
11 There, a web of material is produced so that
12 it successively has three crosswise strips of
13 different weaves. Patterns in the form of
14 the U-shaped layout of a shoe upper are
15 printed on these crosswise strips."

16 Do you see is that?

17 A. Yes.

18 Q. Okay. And German Patent No. 627 878, is
19 that Günther?

20 A. Yes.

21 Q. Okay. All right. So this passage, Column 1
22 starting at line 19, is identifying the -- Günther's
23 base as crosswise strips of different weaves --

24 A. Yes.

25 Q. -- is that right?

1 A. Yes.

2 Q. Okay. Then let's go to column -- still in
3 Nishida, Column 2, line 11.

4 A. Okay.

5 Q. Okay. It starts "By the process according
6 to the invention"; is that right?

7 A. Yes.

8 Q. Okay. And then if we -- so this paragraph
9 is discussing the invention of Nishida; is that
10 right?

11 A. Yes.

12 Q. So then if we go to line 20 -- Column 2,
13 line 20, there's a sentence that starts "The cutting
14 waste."

15 Do you see that?

16 A. Yes.

17 Q. All right. And that reads:

18 "The cutting waste accumulating with cutting
19 out therefore represents a simple,
20 lightweight and inexpensive material. In
21 contrast, with the known material that has
22 crosswise strips, the entire cutting waste,
23 for example, consists of an expensive tubular
24 material, multilayer material or the like."

25 Is that right?

1 A. Yes.

2 Q. Okay. And so that -- the known material
3 that has crosswise strips, that's referring to
4 Günther; right?

5 A. I believe so.

6 Q. Okay. So here, Nishida is explicitly
7 distinguishing its own invention of that from
8 Günther; is that right?

9 A. I would agree with that.

10 Q. All right. And it's saying that one of the
11 differences is that Nishida has less waste; is that
12 right?

13 A. Yes, I think so.

14 Q. Okay. And so in that -- Nishida having --
15 has less waste, that includes less material waste; is
16 that right?

17 A. I would agree with that.

18 Q. Okay. And then it's also that the waste
19 that is -- the material that is waste is less
20 expensive to manufacture; is that right?

21 A. Well, you need to be careful there because
22 the same method may call on the elements, textile
23 elements too. Rather than, you know, quality of the
24 material, it is the design that is less -- less
25 expensive.

1 Q. Okay. What do you mean when you say "it is
2 the design that is less expensive"?

3 A. So if you go to -- if you go to any figures
4 in Nishida, let's say Figure 1, or let's go to the
5 Figures 2 -- Figure 2. So in knitting, you have
6 yarns called warp yarns -- that's why it is called
7 warp knitting -- you know, running in the vertical
8 directions.

9 So as I said earlier, for example for a
10 1-meter or 1-yard fabric wide, there are thousands of
11 yarns in vertical direction. And those yarns, you
12 know, they pass through Element 2, and then there's a
13 gap, you know, there is no element there, and then
14 another element under that. But it -- it is the same
15 yarn that is passing through those elements and then
16 surrounding fabric, surrounding the elements.

17 So -- but if you have the surrounding fabric
18 structure less expensive than the shoe elements, then
19 you would be saving material because that would be
20 less dense material, for example, and you would be
21 using less material.

22 Q. Okay. And also Nishida refers to the
23 surround -- well, you refer to the surrounding piece
24 as a gauze; right?

25 A. Gauze woven -- gauze is a woven fabric --

1 Q. Okay.

2 A. -- that is used in medical industry. We all
3 know that. And it is very open structure, very less
4 dense structure. So there are less number of warp
5 and weft yarns per unit area. So that is the
6 charact- -- characteristics of gauze fabric. But
7 gauze fabric is usually woven fabric, not knitted.

8 Q. Thank you.

9 All right. So let's go back to that excerpt
10 we were looking at on Column 2, starting at line 20
11 through line 26, about avoiding waste.

12 So --

13 A. That is still Nishida; right?

14 Q. Yes. Thank you for clarifying. In Nishida.

15 A. Column 2 and then 26 --

16 Q. Starting at 20 through 26.

17 A. I'm sorry. Okay. Yes.

18 Q. Okay. So there, Nishida is saying that one
19 of the benefits of Nishida is that it has less waste
20 than Günther.

21 A. Yes.

22 Q. Okay. And earlier you said part of the
23 reason a skilled artisan would not view backing 4 to
24 go underneath layout 2 is because it would be
25 wasteful; is that right?

1 A. Yes.

2 Q. Okay. So a skilled artisan would consider
3 using the method from Günther combined with Nishida
4 to be wasteful; is that right?

5 A. Well, that's what Nishida is avoiding. If
6 you look at the Günther, Figures 1 and 2 -- and let's
7 look at the -- the region 2, Roman numeral II. So on
8 the -- that is the cross section. Figure 1 is the
9 cross section of the fabric, and Figure 2 is the top
10 view. So -- and also we can look at Roman
11 numeral III. Okay?

12 So if you follow that cross section, that
13 cross section, let's say 2, is passing through -- on
14 the top view, passing through the knit -- shoe
15 element indicated by 2, and then passing through the
16 surrounding fabric, 1, and then again passing through
17 the shoe element, 4, and then passing through most of
18 the surrounding fabric.

19 Same thing with Roman numeral III. If you
20 follow the width of III on -- on the top view, it is
21 passing through the knit elements and then, you know,
22 some surrounding fabric. So those surrounding fabric
23 is waste.

24 But if you look at Roman numeral II and III,
25 those are the most expensive parts of the fabric

1 because they have more material, and you can see that
2 in Figure 3.

3 If you go down in Figure 3, again, Roman
4 numeral II has more material than I on the left,
5 Roman numeral I, and therefore, it is more expensive
6 than I.

7 But -- so -- but he cannot avoid it. You
8 know -- I mean, Günther I guess could not avoid it
9 with this method. So he is also, you know,
10 discarding expensive material as waste.

11 So Nishida is avoiding that by not using two
12 layers on top of each other, by just using one layer
13 as shown and as we have been discussing in -- in his
14 figures.

15 Q. Okay. And so if the goal of Nishida is to
16 avoid some of that waste, would a skilled artisan
17 looking at Nishida want to add the extra layers from
18 Günther?

19 A. Not necessarily. And again, you know,
20 Nishida is saying that he is improving over Günther,
21 and that's why, you know, the surrounding material is
22 less expensive than the shoe element, and that's how
23 he's improving over Günther.

24 Q. Okay. So just -- just so it's clear, if the
25 goal of Nishida is to avoid -- let me -- excuse me.

1 A skilled artisan looking at Nishida in 2004
2 would -- excuse -- would a skilled artisan looking at
3 Nishida in 2004 have a reason to add the extra layers
4 of fabric disclosed in Günther?

5 A. If that person is doing embroidery, then
6 that's -- I mean, you cannot escape that because
7 embroidery structure is like that.

8 So I think that's -- that's why maybe
9 Nishida kept that 4 there for embroidery process.

10 Q. Okay. So would a skilled artisan looking at
11 Nishida in 2004 have a reason to add the extra layers
12 of fabric disclosed in Günther if they were working
13 on knitting?

14 A. I -- I mean, I don't know what they would
15 think, what they would -- they would do. Depending
16 on the application I guess. I mean, some
17 applications may justify extra cost for extra
18 strength or extra thickness.

19 So I think Nishida is keeping all the
20 options open in its patent trying to cover as much as
21 it could.

22 Q. Okay. So you said you don't know what they
23 would do.

24 Are you aware of a reason that a skilled
25 artisan looking at Nishida in 2004 would add the

1 extra layers of fabric disclosed in Günther if
2 they're working in knitting?

3 A. In knitting? Again, it is not necessary
4 for -- you know, regular, you know, knitting
5 materials. But again, if you want extra strength in
6 the structure, then a second layer always provides
7 that. And that was also, you know, an indication
8 when I was working in -- at Asten Forming Fabrics.

9 We had a singer-layer forming fabrics. We
10 had two-layer forming fabrics. We had -- we had
11 two-and-a-half-layers forming fabrics, and we had
12 three-layer forming fabrics.

13 So -- and each of those fabrics, you know,
14 gave different properties to the paper. So if the
15 paper quality was high and expensive, then you could
16 justify three-layer fabric. But for a cheaper
17 papers, you would use single layer, for example.

18 Q. Okay. So --

19 THE WITNESS: I'm sorry. Could we take
20 another five minutes' break if you don't mind?

21 MR. SEBBA: Yeah. That's fine.

22 THE WITNESS: I -- I would appreciate that.

23 MR. SEBBA: Yep.

24 THE WITNESS: Thank you. I'll be back.

25 VIDEOGRAPHER: We're off the record at

1 1:11 p.m.

2 (Short recess taken.)

3 VIDEOGRAPHER: This is the beginning of
4 Media File No. 5. We are back on the record at
5 1:17 p.m.

6 BY MR. SEBBA:

7 Q. Okay. So we were talking about added
8 backings.

9 A. Yes.

10 Q. And you had said that someone looking at
11 Nishida in '04 might add extra layers of fabric for
12 extra strength; is that right?

13 A. Yes. It is -- it is there as an option.

14 Q. Okay. So then with that in mind, how are
15 you sure that there's no -- that backing 4 in
16 Nishida's Figure 2 does not extend under layout 2 in
17 Nishida's Figure 2?

18 A. If it is embroidery, yes, that extends under
19 those -- Figure 2 and 3. And -- and if it is made
20 woven, and if it -- if it wanted to be made also, you
21 know, thicker, stronger it may extend just like
22 Günther's. But in knitting, it doesn't work that
23 way. It is surrounding fabric and then the -- the
24 elements.

25 Q. Okay. So back to applying the additional

1 layers in Günther to Nishida, would they also not
2 extend underneath layer 2 -- excuse me, layout 2?

3 A. Well, in embroidery, yes, it does.

4 Q. What about in knitting?

5 A. In knitting, I don't think so, because also,
6 4 is shown only in one figure, not in -- not in
7 Figure 4 or Figure 5. It is shown only in Figure 2.
8 And again, I think he kept it as an option, maybe
9 from Günther, but -- but it's only mentioned -- I
10 mean, shown only in one -- one place.

11 Q. Okay. So you said that in an -- in the
12 knitting context, a skilled artisan in '04 might have
13 applied the additional layers disclosed in Günther to
14 the method of Nishida to provide added strength; is
15 that right?

16 A. Well, for embroidery and for weaving, yeah.
17 The option is there in Nishida.

18 Q. And -- and in the context of knitting?

19 A. No. In embroidery and weaving.

20 Q. Only in embroidery and weaving.

21 A. Embroidery, by default, you -- you have to
22 have 4 under -- under 2, because you make 4 somewhere
23 else and then -- and then put embroidery structure on
24 top of that.

25 And for -- also in weaving, you can have

1 multiple layers as shown in Günther's or, as I
2 mentioned, in -- in forming fabrics. But in
3 knitting, there -- there is no need for that.

4 Q. Okay. So a skilled -- would a skilled
5 artisan in 2004 looking at Nishida and Günther use
6 the multiple layers in Günther in the method of
7 Nishida only for knitting?

8 A. No, not for knitting.

9 Q. Thank you.

10 Okay. Let's look at Nishida Column 4,
11 line 22. Let me know when you're there.

12 A. Yes, I am there.

13 Q. Okay. So Nishida Column 4, line 22, reads:
14 "After being cut out, this individual part 29
15 remains connect with layout 2, and after or
16 during the shaping and fixing of shoe upper 3
17 from layout 2, part 29 is folded into the
18 plane of the shoe sole and is fastened to the
19 lower edge zone of the shoe upper 3."

20 Is that right?

21 A. Yes.

22 Q. Okay. So the plane referred to in that
23 excerpt is that of the shoe sole; is that right?

24 A. What plane?

25 Q. In -- on line --

1 A. Oh, okay. Twenty-five?

2 Q. Yes. It says "the plane of the shoe sole."

3 A. Yes.

4 Q. Okay. So does this describe -- does this
5 passage that we just read, Column 4, lines 22 to 26,
6 address the shape of anything other than the shoe
7 sole?

8 MR. LINDSAY: Objection. Form.

9 THE WITNESS: Let me read it one more time.

10 BY MR. SEBBA:

11 Q. Sure.

12 A. Okay. Could you repeat your question again?

13 Q. Does the excerpt that we read on -- in
14 Column 4, lines 22 to 26, of Nishida address the
15 shape of any element other than the shoe sole?

16 A. It is describing how Element 2 is cut, and
17 then Element 29 -- part 29 is folded under on the
18 plane of the shoe sole.

19 Q. Okay. And I don't think that quite answers
20 the question, so I'll ask it one more time.

21 Does the excerpt that we read in
22 Columns 4 -- Column 4, lines 22 to 26, of Nishida
23 address the shape of any element disclosed in Nishida
24 other than the shoe sole?

25 A. Addresses the shoe sole as -- as well as the

1 upper. I mean, the -- the shoe upper element.

2 Q. What does it say about the shoe upper
3 element?

4 A. Well, it is saying that after being cut, you
5 know, the -- the element, after it is cut, Element 2,
6 or the part 2, and then 29 of that -- portion 29 of
7 that element is shaped such that it is folded
8 under -- under the shoe -- upper shoe part in the
9 plane of the -- of the sole. So therefore, it is
10 talking about the sole, plane of the sole as well as
11 the shoe upper.

12 Q. Is it talking about the plane of the shoe
13 upper?

14 A. No, plane of the sole.

15 Q. Okay. So is there an indication that there
16 is a plane of the shoe upper?

17 A. No. It says "plane of the shoe sole."

18 Q. Okay. All right. And then let's look at
19 Nishida Column 5 starting at line 14. Let me know
20 when you're there.

21 A. I am there.

22 Q. Okay. It's -- that -- that paragraph starts
23 "With the embodiment according to FIG. 5."

24 Do you see that?

25 A. Yes.

1 Q. And it continues:

2 "... a forefoot sole part section 29.5, is
3 provided on outside contour 31 of layout 2 of
4 shoe upper 3, and a heel sole part section
5 29.6 is provided on outside contour 30."

6 Do I have that right so far?

7 A. Yes.

8 Q. Okay. And it continues:

9 "Their outside contours 29.7 and 29.8 are
10 later folded under so as to face the middle
11 of shoe upper 2 and are connected with one
12 another to, then, form the entire sole part
13 29."

14 Is that right so far?

15 A. Yes.

16 Q. Okay.

17 "The seam resulting in this case runs
18 crosswise, obliquely, or obliquely in
19 approximately an S-shape or the like
20 corresponding to the configuration of outside
21 contours 29.7 or 29.8."

22 Is that right?

23 A. Right.

24 Q. And then the paragraph continues:

25 "The path of this seam is preferably selected

1 so that it cannot exert an unpleasant
2 pressure on the sole of the foot."

3 Is that right?

4 A. Yes.

5 Q. Okay. Is there anything in this paragraph
6 that -- discussing whether any component of the knit
7 product is planar?

8 A. It is -- the -- the sole part, the -- the
9 parts that are folded under, they are planar.

10 Q. Okay. But only the sole part; is that
11 right?

12 A. It does not specify one way or another about
13 the upper.

14 Q. Okay. To be clear, you're saying that that
15 passage, Column 5, lines 14 to 26, does not specify
16 whether or not the upper of the shoe is planar; is
17 that correct?

18 A. Yeah. From -- from what I -- I can tell,
19 yes, it does not specify on the upper whether it is
20 planar or -- or -- or -- but this is, of course,
21 after it is formed into the shoe upper. Before it is
22 formed into the shoe upper, it is planar, of course.

23 Q. And what is that -- what is -- how do you
24 know that to be true?

25 A. I mean, on the woven -- knitted structure,

1 you know, coming out of the machine, knitting
2 machine, it is a planar -- planar structure. And
3 then the -- the sides are folded under, and then it
4 is formed into the shape of the shoe, then -- then it
5 is not planar. But it doesn't say whether it is
6 planar or some portions are planar or not. But the
7 sole part is planar.

8 Q. Does this -- does that passage address
9 whether or not it's planar upon -- excuse me.

10 Does the passage, Column 5, lines 14 to 26,
11 address whether the shoe upper is planar after it is
12 removed from what you consider to be the surrounding
13 textile structure?

14 A. Let me read it one more time. (Witness
15 reviewing document.)

16 It doesn't specifically say that.

17 Q. Okay.

18 A. But the POSITA would know that when the
19 fabric comes out of the machine, it is planar fabric.
20 And when it is saved into the -- into the shoe shape,
21 then it may or may not be planar. Some portions may
22 not be planar and some portions may be.

23 Q. And does Nishida in Column 5, lines 14 to
24 26, provide any indication as to whether or not the
25 upper, when removed from what you consider to be the

1 surrounding textile structure but before it's formed
2 into the shoe, is substantially planar?

3 A. It doesn't specifically say that, but I
4 mean, a POSITA would know that it is substantially
5 planar.

6 Q. Is there something in column -- in that
7 excerpt in Column 5, lines 14 to 26, that provides
8 support for that?

9 A. Not that I see.

10 Q. And so how would a skilled artisan know that
11 the upper would be planar once it's removed from what
12 you consider to be the surrounding textile structure?

13 A. Well, the way the fabric is made is -- is a
14 planar fabric, so that's -- by default, it comes out
15 of the machine as planar fabric.

16 Q. Okay. Let's go back to the excerpt we were
17 at in Column 4, lines 22 to 26.

18 A. Column 4, lines 20 ...

19 Q. This is in Nishida.

20 A. Twenty-two to 24 you said; right?

21 Q. Twenty-two to 26.

22 A. Twenty-six. I'm sorry.

23 Yes.

24 Q. Okay. Again, is there anything here that
25 indicates that the upper would be planar once it is

1 removed from what you consider to be the textile --
2 surrounding textile structure?

3 A. So the -- part 29 is folded, and then it
4 stays as planar structure, planar shape, but it
5 doesn't talk about the -- the upper part or the
6 fabric.

7 Q. Okay.

8 A. So it may or may not be planar, you know,
9 but it is form into 3D shape now, you know, the --
10 the -- the shoe shape.

11 Q. Okay. So that excerpt doesn't provide any
12 insight into whether or not the upper is planar.

13 A. Well, again, as it comes from the machine,
14 it is planar. But once you put it in the shape of
15 the shoe, it doesn't specify if any part stays planar
16 or not, other than the part that is folded under in
17 the plane of the sole.

18 Q. Oh, right. And -- and I understand that
19 it's your view that a skilled artisan would know that
20 the upper comes off the machine planar; is that
21 right?

22 A. Yes.

23 Q. Okay. Is the -- is that support -- is your
24 view that the upper comes off the machine planar
25 supported at all by anything you see in Column 4,

1 lines 22 to 26?

2 A. Yes, because, you know, part 29, you know,
3 originally it is in the planar shape. And then when
4 it is folded, it stays in the planer shape. So if it
5 was not in the planer shape, it would not stay, you
6 know, as planar once it is folded. So that indicates
7 that the whole fabric structure when it came off of
8 the machine was planar.

9 Q. Okay. Part 29 is the sole part; is that
10 right?

11 Well, let me -- let's look at Column 4,
12 line 65.

13 A. Column 4, line 65?

14 Yes. What about it?

15 Q. So part 29 is the sole part; is that right?

16 A. That's right. The part that is folded
17 under.

18 Q. So part 29 is not part of the upper; is that
19 right?

20 A. Well, originally, it is part of the upper,
21 when it came off the machine. And part of the same
22 structure. Planar structure, part of the same planar
23 structure.

24 Q. So is part 29, the sole part, part of the
25 upper of the article of footwear in Nishida?

1 A. When it -- when it is knitted on the
2 machine, yes, it is part of the -- part of the upper,
3 but it is folded under, under the shoe.

4 But if you consider -- if you consider the
5 sole as the base, so it's -- still, it is -- it is
6 upper.

7 Q. Okay. And why does the sole part being an
8 upper -- excuse me. Misspoke.

9 Why does the sole part being planar indicate
10 that the rest of the sole is planar?

11 A. Well, they come out of the machine as -- as
12 planar structures, the whole element.

13 Q. Hmm-mm.

14 A. And then some of it is shaped into the
15 three-dimensional shape, which is the shape of the
16 shoe, or foot, shape of the shoe. But the other part
17 is folded under, and it -- it stays planar in the
18 plane of the sole.

19 Q. So what in -- what in Column 4, lines 22 to
20 26, indicates that the layout 2 as a whole is planar?

21 A. Yeah. It says, "after or during the shaping
22 and fixing of shoe upper 3 from layout." So that
23 means that before -- before that, it was not --
24 before it was shaped, you know, it was -- it was
25 planar. It was not shaped. It was planar.

1 But during the shaping of -- of the -- of --
2 "shaping and fixing of shoe upper 3 from layout 2."
3 So layout 2 was planar, and then upper 3 from that
4 was shaped -- shaped into shoe shape or foot shape.

5 Q. Could you shape something that was not
6 planar into a shoe shape?

7 MR. LINDSAY: Objection. Form.

8 THE WITNESS: Yeah, but that would not be --
9 that would be difficult to -- to keep the form of the
10 shoe because if the part is already in a shortened
11 shape, three-dimensional shape, and that means that
12 it is set. It is fixed into that shape, so it would
13 be a lot more difficult to reshape it into another
14 shape or form. So it makes sense that before it was
15 shaped, it was planar.

16 BY MR. SEBBA:

17 Q. But it is possible that it could be shaped
18 if it was not planar?

19 A. If it is -- it is possible. It may be
20 possible, but you have to apply force, lots of force
21 to put into another shape because, obviously, the
22 previous shape is formed with the forces involved,
23 and they are saddled forces in that three-dimensional
24 shape. And if you want to convert it to another
25 three-dimensional shape, you have to apply more

1 forces, and -- and the fibers, yarns, fabrics,
2 polymers, in general, they have memory. So they
3 always want to go back to their original shape if
4 they can.

5 So if you tried to reshape it into another
6 form, you have to use more forces to keep in the
7 new -- new form or it may be distorted. You know,
8 if -- this shoe structure, it may be distorted on
9 the -- on the shoe more.

10 MR. SEBBA: All right. Let's take a --
11 let's take a break. Let's take ten minutes. I want
12 to look through my notes.

13 THE WITNESS: Okay.

14 MR. SEBBA: Thanks.

15 VIDEOGRAPHER: We're off the record at
16 1:45 p.m.

17 (Short recess taken.)

18 VIDEOGRAPHER: This is the beginning of
19 Media File No. 6. We are back on the record at
20 1:56 p.m.

21 MR. SEBBA: Thank you.

22 BY MR. SEBBA:

23 Q. Dr. Adanur, let's turn back to your
24 declaration, Exhibit 1002.

25 A. Okay.

1 Q. Let's go to page 107 starting at
2 paragraph 218.

3 A. Okay.

4 Q. Let me know when you're there.

5 A. Yes, I am there.

6 Q. So in this section, you are discussing your
7 view that Nishida discloses simultaneously knitting a
8 textile element with a surrounding textile structure;
9 is that right?

10 A. Yes.

11 Q. Okay. And then in paragraph 218, you note
12 that Nishida -- that part of your reasoning is based
13 on that Nishida indicates it's based on Günther's
14 general process; is that right?

15 A. Could you repeat that?

16 I was reading the paragraph so I couldn't
17 listen to it. Let me read the paragraph first, if
18 you don't mind.

19 Q. Go right ahead. Yeah.

20 A. (Witness reviewing document.)

21 Yes. Go ahead, please.

22 Q. So you're saying in paragraph 218 that part
23 of your understanding of Nishida is based on Günther;
24 is that right?

25 A. Well, Nishida's work or invention is based

1 on Günther, improvement of Günther.

2 Q. Uh-huh.

3 So is part of your understanding of what
4 Nishida discloses based on what Günther discloses?

5 A. Based -- based on that -- by the way, there
6 is a word missing here. "I further note that" it
7 should be Günther "informs what a POSITA would
8 understand."

9 Q. Oh, thank you.

10 A. Sorry about that.

11 Q. All good. I appreciate the clarification.

12 So then you continue on in paragraphs 219
13 through 222 to discuss Günther; is that right?

14 A. Yes.

15 Q. Okay. And so in all of -- in those
16 paragraphs, you are explaining how your understanding
17 of Günther impacts your understanding of Nishida; is
18 that correct?

19 A. Do you mind if I read those paragraphs
20 first?

21 Q. Please go right ahead.

22 A. Yeah. (Witness reviewing document.)

23 Okay.

24 Q. Okay. So in paragraphs 219 to 222 of your
25 declaration, are you explaining how your

1 understanding of Günther impacts your understanding
2 of Nishida?

3 A. Well, partly, because, again, Nishida is
4 also improving over Günther to reduce the waste
5 material.

6 Q. Okay. So your understanding of Nishida is
7 at least partly based on your understanding of
8 Günther.

9 A. Yes, that's what Nishida says in his -- he
10 mentioned that, you know, that is an improvement over
11 Günther.

12 MR. SEBBA: I have no further questions.
13 Thank you for your time today, Dr. Adanur.

14 THE WITNESS: Thank you.

15 MR. LINDSAY: Yeah. I'm -- I'm going to
16 have some -- some questions. I don't need a break if
17 we want to go ahead now. I'm going to try to do this
18 from my notes.

19 THE WITNESS: Okay.

20

21 EXAMINATION

22 BY MR. LINDSAY:

23 Q. Okay. Can you please open the Orei exhibit,
24 please.

25 A. Okay.

1 Q. And you testified about this document
2 earlier today?

3 A. Yes.

4 Q. Do you remember the questions about the
5 phrase "continuously knitted fabric" earlier today?

6 A. Yes.

7 Q. And -- so you were asked a question -- I'm
8 just going to read from realtime here -- that says:

9 "So the 'continuous' relates to the
10 physical placement of components of the
11 resulting knit; is that right?"

12 And your response was:

13 "Exactly.

14 "Yeah, exactly."

15 And then you go on to, you know, explain in
16 more detail what -- what your understanding of the
17 question was.

18 A. Yes.

19 Q. Is it your understanding of Orei that the
20 physical shoe parts are knitted continuously with
21 surrounding fabric between them as shown in the
22 figures?

23 A. Yes.

24 Q. Are Orei's shoe parts touching each other on
25 the fabric as they come off the machine?

1 MR. SEBBA: Objection. Form.

2 THE WITNESS: No, they are not touching.

3 BY MR. LINDSAY:

4 Q. So when you were asked the question about
5 "So the continuous relates to the physical placement
6 of components on the resulting" knitting, can you
7 elaborate on what your understanding of that question
8 was?

9 A. Yes. The -- the fab- -- well, let me
10 explain, you know, what -- what -- what Orei
11 discloses.

12 The -- the fabric, the surrounding fabric
13 and those elements, shoe elements that are shown on
14 that fabric are manufactured continuously together as
15 one piece. And those pieces, elements, shoe elements
16 are not touching each other. But the manufacturing
17 is continuous manufacturing. So, you know, the --
18 the needle bar is in the horizontal direction as wide
19 as the surrounding fabric. And then that knits the
20 stitches, and then those stitches form the
21 surrounding material as well as the elements of the
22 shoe.

23 Q. And is that what we see in Figure 1 of Orei?

24 A. Yes, that's Figure 1 and others too.
25 Figure 5 too.

1 Q. So take a look at Figure 1.

2 Are those individual shoe parts cut out of
3 the surrounding fabric?

4 A. After the fabric is made, yes.

5 Q. And then are those individual shoe parts
6 sewn together to form the upper of a shoe?

7 A. Yes. After they are cut, they are sewn
8 together.

9 Q. Do you remember earlier today testifying
10 about the shape of the top part, I think we referred
11 to it, matching shape the -- the shape of the right
12 part at least along the contoured line that are
13 closest to each other?

14 A. Yes.

15 Q. Is that the line along which those parts are
16 sewn?

17 A. I would assume so. They look like matching,
18 similar. But again, there is no way to -- to be sure
19 from these figures unless you cut it and then put
20 them together. It doesn't say that the figures was
21 drawn to scale, so ...

22 Q. So when you're sewing two parts together, is
23 it generally the case that those parts would have
24 complementary contours?

25 A. I would assume so.

1 Q. Is that your opinion with respect to
2 Figure 1, that those contours are complementary
3 because those parts are going to be sewn together?

4 MR. LINDSAY: Objection. Leading.

5 THE WITNESS: Yes. That would be my
6 understanding. Again, I don't know -- it doesn't say
7 that the figure is to the -- to the scale, so -- but
8 I mean, the purpose is to put the -- those parts
9 together to form the shoe. So I would assume that,
10 yes, they would fit.

11 BY MR. LINDSAY:

12 Q. Earlier today you were asked about some
13 exhibits that were legal documents.

14 Do you remember some of those discussions?

15 A. Yes.

16 Q. Those legal documents were from a prior IPR
17 and from the corresponding litigation, not -- not
18 from this proceeding; right? You remember which ones
19 I'm talking about?

20 A. Yes.

21 Q. Was your analysis of the prior art based on
22 those legal documents, or was it your independent
23 analysis of the -- the prior art?

24 A. My independent analysis.

25 MR. SEBBA: Objection.

1 THE WITNESS: I'm sorry. My independent
2 analysis.

3 BY MR. LINDSAY:

4 Q. Would you turn to your declaration,
5 Exhibit 1001 [sic], paragraph 127.

6 A. 1002; right?

7 Q. Yes.

8 A. Okay. Yes.

9 Q. Do you want to take a minute just to read
10 the paragraphs to refresh your recollection?

11 A. Which paragraph?

12 Q. 127. Sorry.

13 A. 127. Okay. (Witness reviewing document.)
14 Yes, I did.

15 Q. So you cite to Spencer in that paragraph;
16 right?

17 A. That's right.

18 Q. And -- and what is Spencer? What is your
19 understanding of the reference Spencer?

20 A. David Spencer is the author of the book
21 knitting -- it's a comprehensive book in knitting and
22 maybe, you know, one of the best books in -- written
23 in knitting. And maybe the -- the best. So it's a,
24 you know, very good reference book, and it covers
25 almost every aspect of knitting, weft knitting and

1 warp knitting and -- you know, at its time.

2 Q. Okay. Can you open up that exhibit, then,
3 Exhibit 1050?

4 A. Yes, I did.

5 Q. Okay. Can you take a look at page 145.

6 A. I'm still going there. Yes.

7 Q. Okay. Are you familiar with this -- with
8 this chapter?

9 A. Yes. That's circular fabric knitting. And,
10 in fact, I use figures from this book in my classes.

11 Q. Okay. And can you read the paragraph
12 that's -- second one from the bottom that starts "In
13 the cutting room"?

14 A. Okay.

15 "In the cutting room, the lengths of
16 fabrics are layed-up, many ply thicknesses
17 deep, onto long cutting tables using a
18 traversing carriage to transport and lay the
19 fabric. Cutting-out techniques vary widely,
20 from marked lays whose outlines are followed
21 by hand-guided cutting knives, [or] press
22 cutter blades shaped to the outline of the
23 garment part, and cutting blades guided by a
24 computerised program."

25 Q. What does "cutting-out techniques" mean?

1 A. Cutting-out techniques is when you have the
2 fabric, usually, again, it is rectangular shape from
3 those machines. And that is not the shape of the
4 garment, of course. You have to cut the different
5 shapes of the garment from that fabric. And those
6 shapes, the pattern of those shapes are marked on the
7 fabric, either with a marker or with papers put on
8 top of the fabric and marked on the paper, premarked
9 paper, and then cut using different techniques. And
10 laser is one of them, but it is not mentioned here I
11 think.

12 Q. So what is the name of the material, if
13 there is one, from which the shapes are cut?

14 A. I didn't understand the question. I mean,
15 that is the fabric. The shapes are cut from the
16 fabric, from the roll of fabric, the fabric roll.

17 Q. So -- so not all of the fabric are the
18 shapes that you're cutting out.

19 Is that what you're saying?

20 A. The fabric has a -- again, a specific shape.
21 And that is, you know, several yard or a couple of
22 yards, 2, 3 yards. Whatever the size of the
23 machine -- width of the machine, that is the width of
24 the fabric. And then the longitudinal direction is
25 very long. And so it is wrapped on a roll that is

1 called fabric roll on the machine.

2 So once the yarns are finished, then the
3 fabric is removed, fabric roll is removed from the
4 machine and put -- put on a table to be cut to the --
5 to the garment shape or whatever you are making. And
6 then, again, those shapes are marked on the -- on the
7 whole fabric, roll fabric, and then cut.

8 Q. And so the shapes are cut away from what?
9 Surrounding fabrics?

10 A. From -- yeah, exactly.

11 MR. SEBBA: Objection. Leading.

12 THE WITNESS: From the roll fabric, from --
13 you know, from the surrounding areas, yes. And that
14 surrounding area, you know, should be minimized so
15 that there would be less waste.

16 BY MR. LINDSAY:

17 Q. Okay. Earlier today you were asked about
18 Nishida and about disclosure of the -- of the textile
19 elements and the surrounding structure as being
20 simultaneous; right? And so the question was:

21 "So where are in Nishida does it
22 disclose that they're produced
23 simultaneously?"

24 And then you went on to say:

25 "Well, there's is no other way to ...

1 make these fabrics. There's no other way in
2 knitting."

3 And, you know, you described the machines
4 and the -- and the way they -- they work.

5 Do you remember that?

6 A. Yes.

7 Q. Okay. And so in that context, if you can
8 turn to your declaration, paragraph -- let's see.
9 Okay.

10 So it's the bottom of paragraph 215. You'll
11 see paragraph 215 has some text, and it has a couple
12 of figures, and then it has some text below the
13 second figure on page 106. Let me know when you're
14 there, please.

15 A. I am there, paragraph 215.

16 Q. Okay. So you see after Figure 4 on
17 page 106, there's a citation to the abstract.

18 Do you see that?

19 A. Yes.

20 Q. You want to read that for me, and then I'd
21 also like to -- you to look at the full citation in
22 Nishida, which is Exhibit 1022, just for
23 completeness.

24 A. Okay.

25 "Abstract ('[A] web of Material (1) is used

1 to produce layouts (2) by different
2 production measures ... at the same time with
3 the production of web of material"

4 Q. Right.

5 Okay. And then I wanted you to look at --
6 sorry for jumping around, Dr. Adanur, but since there
7 is a part of that quote that's been not included here
8 in your declaration, just for completeness, if you
9 could pull up Nishida Exhibit 1022 and then look at
10 the -- the full sentence in the abstract that you
11 cited here.

12 A. Okay. Yeah, I found it.

13 Shall I read it?

14 Q. Well, no, I -- unless you have some
15 questions, I was just going to ask you another
16 question about it. I wanted you to have the full
17 citation.

18 A. I have the full abstract, yes --

19 Q. Okay.

20 A. -- open here.

21 Q. So earlier when you were asked "Where in
22 Nishida does it disclose that they're produced
23 simultaneously?" would you consider the abstract to
24 be one of those areas that Nishida discloses
25 producing the web of material 1 simultaneously

1 with -- with the other aspects of the -- of the
2 layouts?

3 A. Yes.

4 MR. SEBBA: Objection. Form. Leading.
5 Who's testifying here?

6 THE WITNESS: Yes.

7 MR. LINDSAY: I'll withdraw and ask a
8 different question.

9 BY MR. LINDSAY:

10 Q. So earlier when you were asked where in
11 Nishida does it disclose producing the -- its parts
12 simultaneously, would the abstract be one of those
13 citations?

14 MR. SEBBA: Objection. Form.

15 THE WITNESS: Yes.

16 BY MR. LINDSAY:

17 Q. Okay. Okay. So staying in Nishida and --
18 at the moment, do you recall earlier testifying about
19 the backing 4 that's shown in -- referenced in
20 Figure 2?

21 A. Yes.

22 Q. Does Figure 1 of Nishida have a backing 4?

23 A. No.

24 Q. Does Figure 4 of Nishida have a backing 4?

25 A. No.

1 Q. Does Figure 5 of Nishida have a backing 4?

2 A. No.

3 Q. Do you each of the Figures 1, 2 -- no.

4 Strike that.

5 Do each of the Figures 1, 4, and 5 depict a
6 web of material 1?

7 A. Yes, they do.

8 Q. So does Nishida disclose a web of material 1
9 that does not have a backing 4?

10 A. Yes. And I believe I mentioned that also
11 today earlier.

12 Q. Can you turn back to the abstract for a
13 moment of Nishida?

14 A. Okay.

15 Q. About six lines or so from the bottom, you
16 see where it says "single layer or" multiple layer --
17 "or multilayer type of material"? Do you see that?

18 A. Yes.

19 Q. And then with that in mind, can you turn
20 over to Column 3 down at the bottom, line 66 or so.
21 And you see the part where it says, In this --
22 "Optionally, in this case the material can be woven
23 or knitted in two or more layers"? Do you see
24 that?

25 A. Did you say column -- yes. "Optionally,"

1 yes, I see it.

2 Q. Yeah, Column 3, line 66.

3 A. Yes. Yes, I see it.

4 Q. Does -- Nishida disclosed single and
5 multilayer knitted structures?

6 A. I -- from my understanding, it disclose --
7 he discloses only single-layer knitted structures.

8 Q. Okay. In the case of a woven fabric, does
9 he disclose single and multilayer structures?

10 A. Well, since his invention is based on
11 Günther's and Günther's is more for weaving, woven
12 fabric, so it seems that he -- he discloses by
13 default multilayer woven fabric, so that would be
14 included.

15 Q. In Nishida, Column 4, lines 47 -- there's a
16 paragraph there that starts lines 47. You were asked
17 about this earlier today. Talks about different
18 types of a process that uses different types of
19 fibers and yarns.

20 Do you -- do you see that?

21 A. Yes.

22 Q. And it -- it's referring to -- it says "a
23 fully developed loom, up to 7 different textile
24 fibers."

25 Do you see that part?

1 A. Yes.

2 Q. Now, earlier you mentioned that this was in
3 the context of -- of a weaving, I think; is that
4 right?

5 A. Yes.

6 Q. In the context of knitting, would a person
7 of ordinary skill in the art understand Nishida was
8 disclosing the use of multiple yarns being knitted
9 into a single fabric as well?

10 MR. SEBBA: Objection. Form. Leading.

11 THE WITNESS: Well, in this paragraph, he is
12 talking about the loom, and loom is a -- a weaving
13 machine. Older weaving machines are called loom,
14 shuttle machines, basically, that use shuttles for
15 the insertion. And shuttle is pretty much obsolete
16 these days because there are new insertion mechanisms
17 for those weaving machines. So here, he is talking
18 about weaving.

19 BY MR. LINDSAY:

20 Q. And if we can go back to the abstract, then,
21 about halfway down, it says:

22 "For this purpose, a web of material ... is
23 used to produce layouts (2) by different
24 production measures, such as different
25 styles, yarn material, color, material

1 thickness"

2 Do you see that and so on?

3 A. Yes.

4 Q. Is -- does that disclosure relate to
5 knitting as well?

6 A. Yes, it could.

7 Q. Yes.

8 Okay. In your declaration, if -- if you
9 could go to page -- well, it's bottom of page 137,
10 paragraph 287, the section starts.

11 (Pause in the proceedings.)

12 VIDEOGRAPHER: We're off the record at
13 2:33 p.m.

14 (Short recess taken.)

15 VIDEOGRAPHER: This is the beginning of
16 Media File No. 7. We are back on the record at
17 2:38 p.m.

18 BY MR. LINDSAY:

19 Q. So, Dr. Adanur, I -- before the break, I
20 directed you to page 137, paragraph 287.

21 Do you see that?

22 A. Yes.

23 Q. And there's a "GROUND 2B" there, right,
24 that's challenging certain claims as being obvious
25 over Nishida in view of Günther.

1 Do you see that?

2 A. Yes.

3 Q. Do you want to take a moment -- it's a short
4 section, it's just a few paragraphs, do you want to
5 take a moment to refresh your recollection of -- of
6 those paragraphs?

7 A. How many paragraphs?

8 Q. It just goes like a page and a half, I
9 think, if you don't include the figure.

10 A. Okay. (Witness reviewing document.)

11 Q. You don't need to read every one. I just
12 wanted you to be -- refamiliarize yourself with the
13 points in those paragraphs generally.

14 A. Okay.

15 Q. Are you still reading or are you waiting for
16 me?

17 A. I'm still reading.

18 Q. Okay.

19 A. (Witness reviewing document.)

20 Okay.

21 Q. So is this section discussing modifying
22 Nishida's web of material 1 in accordance with
23 Günther's multilayer approach?

24 A. Yes.

25 Q. And you provide some reasons why it would

1 have been obvious to do that.

2 Is that what this section's describing, more
3 or less?

4 A. Yes.

5 Q. And -- and you -- here today, you still
6 agree that it would have been obvious to modify
7 Nishida's web of material 1 with Günther's multilayer
8 approach for the reasons you provide in this section?

9 MR. SEBBA: Objection. Form.

10 THE WITNESS: Well, it depends on the -- on
11 the -- on the structure that one is trying to do.

12 So Nishida is really open to three different
13 methods: knitting, weaving, and embroidery. So --
14 so, you know, using a multilayer structure or not
15 depending -- depends on those methods as well as the
16 application of the product.

17 MR. LINDSAY: Okay. All right. I -- I have
18 no more questions.

19 MR. SEBBA: Nothing further from me either.

20 VIDEOGRAPHER: Okay. This concludes the
21 deposition on December 16, 2025, at 2:43 p.m.

22 (This deposition was concluded at
23 2:43 p.m.)

24 * * * * *

25

REPORTER'S CERTIFICATE

I, EMILY A. GIBB, a Certified Shorthand Reporter and Registered Professional Reporter certified in Utah, Nevada, California, Washington, Idaho and Oregon hereby certify:

THAT I reported the taking of the deposition of SABIT ADANUR, PH.D., commencing on December 16, 2025, at 8:30 a.m.

THAT prior to being examined, the witness was placed under oath to tell the truth, the whole truth, and nothing but the truth; that the proceedings were taken down by me in shorthand and thereafter my notes were transcribed through computer-aided transcription; and the foregoing transcript constitutes a full, true, and accurate record of such testimony adduced and oral proceedings had, and of the whole thereof.

I further certify that I am in no way related to any of the parties, nor I am I financially interested in the outcome of the case.

☐ Review and signature was requested.

☐ Review and signature was waived.

☐ Review and signature was not requested.

IN WITNESS THEREOF, I have subscribed my name on this 18th d:



Emily A. Gibb, RPR, CSR, CCR

&	122:6,8,16	48:23	115 3:17
& 2:3,9 5:2,4 19:16	144:23,24	1016 35:20,22	12 51:5
0	145:1 146:2	42:13	124 53:14,15
04 126:11 127:12	151:25 152:25	1017 36:2,4,7	127 73:17
1	153:22 154:3,5	42:13	147:5,12,13
1 4:13 10:22 11:1 52:21,25 53:1,20,25 54:1,13 56:1 56:14 57:10,23 58:13,16 59:1 60:3 63:9,12 63:17 69:14,18 69:19 70:5 89:16 92:6,13 94:3,7,10,11,18 94:22 95:13,16 95:18,21,23,23 96:4,7 97:19 97:21,23 98:3 98:5,23 99:9 99:24,25 100:24 101:2 102:19,20 103:6,13,13,14 103:16,24,25 104:18 111:5,6 116:2,5,19,23 117:3,21 120:4 120:10,10	154:6,8 158:22 159:7 1-2 100:23 1.1 98:15,17,19 98:20,24 102:21 1.1. 99:9 102:19 10 10:9 11:16 27:4 48:22 56:12 104:13 1001 147:5 1002 8:3,14,19 139:24 147:6 1005 36:16 1006 37:12 1007 37:20,22 1008 38:9,18,19 38:20,23 1009 39:1,2,4 1010 39:8,10 1011 39:13,15 1014 3:9 32:9 32:12 34:5,5 35:3 42:11 48:23 50:21,22 51:1,17 1015 32:15,18 35:13 42:13	1019 33:8 35:16 42:13 1020 3:11 51:24 52:1,3 52:10,12,14 1022 3:15 78:13,14,20,22 79:4 151:22 152:9 1023 3:17 115:18,19 1027 55:1,3 104:10 1028 55:12 1029 55:16,16 1032 104:11 107:25 108:1 1033 104:14 107:19 108:1,1 108:1,5,9 1050 3:13 74:2 74:9,11,12,14 74:21 148:3 106 151:13,17 107 140:1 10:40 73:6 10:53 73:9 11 118:3	12 51:5 124 53:14,15 127 73:17 147:5,12,13 12:03 109:23 12:40 110:2 13 59:23 60:23 61:5,14,19,24 62:7,14 99:2 137 157:9,20 14 130:19 132:15 133:10 133:23 134:7 142 3:4 145 148:5 14551 1:25 5:12 149 8:14 15 27:4 16 1:18 4:5 56:10 59:2,2 159:21 160:5 17 59:2 104:14 107:19 108:1,5 108:10,19 18th 160:20 19 117:4,22 1932 116:7,7 1980s 85:25 1983 27:3 1995 27:16 1:11 126:1

1:17 126:5 1:45 139:16 1:56 139:20 1a 64:1 1b 70:1 1c 64:14 69:24 69:25 70:1	127:7,22 128:15,17 129:16 130:5,6 131:3,11 137:20 138:2,3 149:22 152:1 153:20 154:3 156:23	2018 42:22,22 2020s 45:11 2023 21:21 2024 34:9,10 40:17 41:12,13 41:18,22 42:22 42:23 43:1 45:22	136:1 137:20 28531 160:22 287 157:10,20 29 128:14,17 129:17,17 130:6,6 131:13 135:3 136:2,9 136:15,18,24
2			
2 41:4 55:24 69:4,6,8,22 79:15,21,22 89:2,3,5 90:8 91:16 92:5,12 94:9,13,19,19 95:8,20 97:1,2 97:10,12,16,18 99:13,24 101:3 102:4 103:12 104:23 105:8 106:20,20 107:10 108:12 109:1,4 110:15 110:17,18,18 111:1,1,4,5,7 111:10,20 114:17 116:1,2 116:5,13 118:3 118:12 120:5,5 120:12 121:10 121:15,24 122:6,7,9,13,15 126:16,16,17 126:19 127:2,2	2,000 12:7 20 12:13 118:12,13 121:10,16 134:18 2000 42:24 2003 27:18 2004 40:7 41:19,24 43:9 43:12 44:1,5 44:14,20 45:2 45:4,7,12 83:6 84:2 85:8,9 88:23 106:24 107:8,10,14 108:25 110:25 111:8,19 112:8 112:10,19 124:1,3,11,25 128:5 2007 27:19 201 74:4,5 2010s 45:11 2015 16:19 2017 42:24 43:1	2025 1:18 4:5 159:21 160:6 160:20 2027 54:25 210 100:19 213 2:11 215 151:10,11 151:15 217 100:16 218 140:2,11,22 219 141:12,24 22 79:2 128:11 128:13 129:5 129:14,22 134:17 136:1 137:19 222 141:13,24 24 134:20 243-4000 2:11 25 59:19 26 31:19 121:11,15,16 129:5,14,22 132:15 133:10 133:24 134:7 134:17,21	29.5 131:2 29.5.3 74:21 75:3,8 29.5.3. 76:5 29.6 131:5 29.7 131:9,21 29.8 131:9 29.8. 131:21 2:33 157:13 2:38 157:17 2:43 159:21,23 2b 157:23
			3
			3 56:8 69:4,6,8 73:9 94:20 99:2,22 101:4 101:6 123:2,3 126:19 128:16 128:19 131:4 137:22 138:2,3 149:22 154:20 155:2 30 28:11 131:5 31 72:13,20 131:3

311-319 3:10 32 72:16,19 34 92:20,22 95:6 96:25 97:13 35 3:10 92:3,18 92:19 94:5 36 92:22 94:6 95:7 96:25 97:13 363 74:5,17 37 3:10 3a 70:1 3d 135:9	114:20 121:23 122:17 124:9 126:15 127:6,7 127:22,22 128:10,13 129:5,14,22,22 134:17,18 135:25 136:11 136:13 137:19 151:16 153:19 153:22,24,24 154:1,5,9 155:15 40 12:23 94:8 94:13 95:8 400 2:4 14:12 42.100 3:10 44th 2:10 47 114:20,22 155:15,16	5,345,638 3:16 50 3:9 11:16 17:4 500 14:13 51 3:11 5320 17:1 5520 17:4 58 53:14 59 63:12,18 65:19	749 21:15,18,23 30:4,13,13,16 30:17,18 31:1 31:5,7,8,25 32:23 33:4 48:17,19 49:3 81:5,18 82:18 82:20,25 83:2 83:18 84:1,18 760-5220 2:5 77 31:18 49:15 49:19 777 2:10 78 3:15 79 33:1
4		6	
4 56:10 59:2,2 59:19 92:7,9 92:12 94:17 97:25 98:2,20 98:25 99:9,11 99:18 100:5 101:9,9,12 102:6,10,17,20 103:6,12,16,24 103:25 104:2 104:18,23 105:7,20,24 106:12,15,19 107:10 109:1,3 109:8 110:1,17 110:25 111:9 113:8,8,11 114:14,16,16	40 12:23 94:8 94:13 95:8 400 2:4 14:12 42.100 3:10 44th 2:10 47 114:20,22 155:15,16	6 57:14 99:23 139:19 60 11:16 12:24 71:24 61 73:16 627 3:17 117:10,18 63 98:20 6320 17:1,4 65 136:12,13 6520 17:4 66 154:20 155:2 67 71:24	8 8,266,749 21:12 80 12:13 840 2:4 878 3:17 117:10,18 8:30 1:19 4:5 160:6
	5	7	9
	5 3:3 13:7,8 53:21 55:24 56:5,6 59:1 72:3,9,12 92:3 92:12,17,21,22 94:5 95:6 96:24 97:13 126:4 127:7 130:19,23 132:15 133:10 133:23 134:7 144:25 154:1,5	7 51:4,6 115:2 155:23 157:16 7,051,460 3:12 70 26:18 709 1:25 74 3:13	90017 2:11 92660 2:5 949 2:5 95 13:8 99 10:25 27:18 9:28 41:1 9:39 41:5

a	adanur 1:15	50:12,13	44:2,4,13
a.m. 1:19 4:5	3:2 4:14 5:5,13	administer	45:15 46:8,10
41:1,5 73:6	5:16,23 6:3,6	4:19	46:17 146:21
160:6	7:16 24:12	advanced 82:2	146:23,24
aaron 2:9	41:7 73:11	82:2 116:7	147:2
13:19	110:4 139:23	advantages	analyze 41:17
able 7:13 23:3	142:13 152:6	114:24	41:21 43:8
43:7,13 44:3	157:19 160:5	affiliations	analyzed 18:17
85:7 86:9,12	add 74:9	4:24	18:18 20:16
112:6	123:17 124:3	ago 14:16 16:6	41:23
above 69:24,25	124:11,25	20:23 27:5	angeles 2:11
abstract 151:17	126:11	33:24 34:2	annotated
151:25 152:10	added 72:9	47:11,11,12	53:25 54:3
152:18,23	126:7 127:14	agree 4:12	63:11,17 72:3
153:12 154:12	addition 73:20	42:24 57:21	annotation
156:20	additional	102:10 119:9	54:5 72:5,9
academician	47:14,17,18,24	119:17 159:6	annotations
87:1	126:25 127:13	ahead 34:17	54:4
accept 43:4	address 78:3	46:22 74:23	answer 7:6,12
accordance	129:6,14,23	109:14 113:25	26:4 33:22
158:22	133:8,11	140:19,21	107:5 108:2
accumulate	addresses	141:21 142:17	answered 7:13
12:6	129:25	aided 160:9	answering 6:25
accumulating	adduced	air 14:7 88:5	answers 6:19
118:18	160:10	109:21	129:19
accurate	adidas 17:25	al 52:13	anybody 23:13
160:10	18:23 19:19,23	alleged 21:10	81:6 82:4
action 4:20	21:22 23:25	29:25	88:18,21
actual 89:23	31:21,24 33:5	alternating	apart 68:8
90:3	33:9,11 34:6	27:15	apologize
actually 16:1	34:11,21 35:13	american 26:25	106:13
50:16 65:15	35:17 42:2,4,6	analysis 18:24	appeal 1:2
92:2 94:17	42:14,19 48:22	39:19 40:2	appearance
	49:10,25 50:7	41:15,20 43:11	4:23,24

appendix 8:13 8:21 appleton 13:13 application 111:25 124:16 159:16 applications 15:21 124:17 applied 92:15 127:13 apply 138:20 138:25 applying 126:25 appreciate 74:6 125:22 141:11 approach 158:23 159:8 approximately 6:8 10:9,22 12:23 20:22 66:16 68:3 131:19 aqua 54:8 area 13:2 61:20 78:6 121:5 150:14 areas 98:22 150:13 152:24 arguments 39:20 45:5,8 arnold 2:9 5:2 arnoldporter.... 2:12	art 21:9,10 22:13 29:6,24 29:25 31:6 41:17,21 43:8 49:1,6,11 50:1 50:9,19 51:19 80:23 85:12 86:16 146:21 146:23 156:7 article 100:21 136:25 articles 23:20 75:13,19 83:25 artisan 41:18 41:22 44:20 45:4,7 82:12 83:3 84:4 85:8 87:5 106:24 107:8,9 108:22 108:25 110:25 111:9,14,19 112:8,20 121:23 122:2 123:16 124:1,2 124:10,25 127:12 128:5 134:10 135:19 arts 86:15 asked 22:3 28:13 44:11 143:7 144:4 146:12 150:17 152:21 153:10 155:16	asking 6:17 38:5 86:9 112:5 aspect 44:18 48:12,15 147:25 aspects 49:1 153:1 assembled 69:13 assistant 15:17 association 27:1,12 assume 7:7 145:17,25 146:9 asten 9:16,18 9:20 15:9 125:8 athletic 17:22 18:3 20:15 52:20 atlanta 17:25 18:7,23 19:9 atma 26:24 27:15 attend 27:6 attended 27:22 attorney 4:25 24:17 auburn 9:13 15:10,14,15 16:2 17:10,20	audio 4:10 author 147:20 authorized 4:19 available 81:2 81:17 82:22 83:7,8 84:14 85:12 87:11,24 111:21 112:10 avoid 123:7,8 123:16,25 avoiding 121:11 122:5 123:11 aware 39:25 40:1 84:13 85:8 124:24
b			
b 3:7 6:3 b2 3:12 back 8:11 16:21 29:4 41:4,7 49:14 67:3 71:22 73:11,13 89:1 95:6 101:17 102:4 110:1,4 117:1 121:9 125:24 126:4 126:25 134:16 139:3,19,23 154:12 156:20 157:16			

background 8:3,24 26:11 26:12,21 105:3	86:20 87:5,13 91:17,20,20 93:14,15 96:10	33:13,15 34:22 34:25 37:16,24 38:22,25 39:7	66:22,23 67:5 69:17 72:20 89:13 90:10
backing 93:6 99:1,2,4,4 102:7,8,10,11 102:15,17 103:7,12 104:23 105:7 105:24 106:12 106:15,19 107:10,19,21 107:24 108:5,8 108:11,15 109:1,8 110:17 110:25 111:9 111:19 113:15 114:16 116:17 116:18,22 121:23 126:15 153:19,22,24 154:1,9	97:9,12 107:22 109:5 111:3,16 140:12,13,23 140:25 141:4,5 141:5 142:7 146:21 155:10	39:17 40:5,10 40:16 48:4 59:1 61:6,24 62:7,23 84:24 100:13 104:10 110:16 113:14 119:5 154:10	148:12 151:10 154:15,20 157:9
backings 126:8	basic 96:19	belt 11:16	bowling 2:9 13:19
bar 55:17 58:3 73:21 84:20 89:14,19 94:24 94:25,25 144:18	basically 10:18 14:20 70:19 116:8 156:14	benefits 121:19	box 89:22
base 98:10 103:4 108:24 117:23 137:5	basis 60:11 80:19 82:11 84:4 96:10	best 147:22,23	break 7:10,13 38:7 40:21 41:8 72:25 82:9 109:17 110:7,12 125:20 139:11 142:16 157:19
based 43:11 44:13,22 59:4 59:9 82:13,17	bay 61:20,20 61:20	birmingham 27:17,18	breaks 70:21
	beach 2:5	bit 8:2 65:21	brief 55:24
	beautiful 10:8 13:11 15:22	blades 148:22 148:23	broad 26:12
	beauty 81:24	blender 14:22	brochures 28:4 83:24,24
	bed 75:12,15 77:13 89:14	blue 66:20,24 67:3,4,8,11,15 67:20,21 104:16	brown 14:2 53:20 54:6,10 57:7,19 72:8
	beginning 4:25 12:1 41:3 73:8 109:25 126:3 139:18 157:15	board 1:2 33:5 46:14 47:6,20	building 16:1,4
	believe 16:5 18:15 19:25 20:2,22 21:11 21:20 26:7,18 27:2,3,19 29:5 29:21 32:13	book 147:20,21 147:24 148:10	buildings 16:2 16:4
		books 147:22	built 16:5,6 90:16
		border 68:20	business 87:21
		borders 68:20 103:20	buy 81:6
		bottom 51:6 53:14 64:25 65:10 66:4,8,9	buying 82:5

c			
c 2:1 4:1 c.f.r. 3:10 ca 1:25 california 2:5 2:11 5:11 30:22 37:2,10 160:3 call 64:11 65:4 119:22 called 5:17 10:1 10:12 11:12 13:16 22:17 71:15 98:10 120:6,6 150:1 156:13 camera 4:8 careful 119:21 carefully 36:12 carolina 9:4,7,7 26:25 27:7 carriage 148:18 case 1:5 4:15 8:10 18:13,14 18:15 20:21 21:22 22:1,14 22:21 23:2,5,6 23:8,11,15,22 24:13,15,23,25 26:3 33:24 35:9 39:19 41:16,21 42:4	44:12 48:12,15 48:16,22 50:12 86:10,16 98:8 102:18 131:17 145:23 154:22 155:8 160:13 castello 51:12 51:16,21 cause 68:20,24 ccr 1:25,25 160:22 cellulosic 10:23 center 2:4 76:18 77:6 central 30:21 37:2,9 certain 33:3 91:9 107:1 157:24 certificate 160:1 certified 5:11 160:2,3 certify 160:4,12 cetera 14:2,8 69:1 89:24 challenging 31:25 157:24 changed 19:14 chapter 148:8 charact 121:6 characteristics 14:4,6 121:6	chat 38:5,12,13 38:16 cheaper 125:16 check 40:9 43:2 50:2 101:15 chicago 2:9 christopher 31:16 circular 25:3 25:11,11,12 59:24 148:9 circulating 84:19 citation 151:17 151:21 152:17 citations 153:13 cite 32:1,9 33:8 74:2 147:15 cited 152:11 claim 57:10,10 57:14 claims 32:22 33:4 57:8 157:24 clarification 14:5 74:7 141:11 clarify 7:6 40:14 75:6 79:14 clarifying 121:14	class 25:19 27:9 86:24 88:4 classes 25:14 105:4 148:10 clean 6:20,23 clear 8:17 63:16 96:17 123:24 132:14 client 24:13,17 close 77:23 closed 13:2 closely 84:18 closest 145:13 code 83:14 collect 28:4 color 156:25 colors 115:4 column 55:24 56:10 59:2,2 59:19 92:3,17 92:21,22 94:5 95:6 96:24 97:13 98:20 99:2,22 114:20 117:3,21 118:2 118:3,12 121:10,15 128:10,13 129:5,14,22 130:19 132:15 133:10,23 134:6,7,17,18 135:25 136:11

136:13 137:19 154:20,25 155:2,15 columns 129:22 combination 49:21 combined 122:3 come 64:7 81:11 83:11 94:25 113:8,11 114:15 137:11 143:25 comes 55:6 88:14 133:19 134:14 135:13 135:20,24 coming 64:1,15 89:18 133:1 commencing 160:5 commercial 82:13,16,18 85:13 100:3 commercially 81:2,17 83:8 87:24 communicate 110:11 communicated 22:22 companies 17:21,23 22:17	28:5 87:18,25 company 9:12 9:15 14:25 17:25 18:6,12 18:23 19:23 83:24 85:23 88:10,11 compared 80:7 comparison 47:10 competitive 112:15 complementary 145:24 146:2 complete 69:10 69:12 79:24 completed 6:25 completeness 151:23 152:8 complicated 88:9 component 132:6 components 57:23 58:2,16 71:4 89:5 90:7 143:10 144:6 composed 76:11 comprehensive 3:13 147:21 comprising 57:15	computer 7:24 8:12 19:4 22:8 24:7 82:2 86:1 160:9 computerised 148:24 concentrating 24:2 85:5 concerns 21:12 concluded 159:22 concludes 159:20 conducted 4:6 confidential 24:18 26:6 configuration 116:15 131:20 connect 128:15 connected 131:11 connecting 69:18 connection 4:8 consider 46:7 108:25 110:25 111:19 122:2 133:12,25 134:12 135:1 137:4,4 152:23 considered 36:11 46:11 49:1,10	consistent 68:6 consists 118:23 constant 54:23 constitutes 160:10 construction 32:22 construed 33:4 consulted 17:21 contacted 20:20 contained 39:20 context 127:12 127:18 151:7 156:3,6 continue 4:11 71:19 116:23 141:12 continued 41:14 continues 89:21 90:16 101:7 131:1,8 131:24 continuous 53:18 70:8,9 70:12,17 71:2 71:3,15,16 76:10 143:9 144:5,17 continuously 11:15,18,21,25
---	---	---	--

56:13 59:3 70:10,16 71:20 143:5,20 144:14 contour 131:3 131:5 contoured 145:12 contours 131:9 131:21 145:24 146:2 contrast 118:21 controlled 82:3 conventional 100:1,25 conversations 21:4 convert 138:24 correct 13:22 20:25 42:19 62:2 85:3 101:15 132:17 141:18 corrected 102:2 correctly 35:1 73:25 corresponding 131:20 146:17 cost 14:14 112:13 124:17 cotton 10:22 counsel 4:23 72:7	couple 14:15 27:9 149:21 151:11 course 6:16 16:25 17:1,3 22:15 26:22 28:9 38:17 45:2 62:8 68:1 68:2 70:3 71:15 90:21 132:20,22 149:4 courses 16:19 16:22 86:23 court 5:6,9,11 6:18 37:2 cover 35:5,6,10 35:10,14,14,17 35:17,25,25 36:7,8,13,13,14 36:15 37:5,5 37:17,18,25,25 38:23,24 39:5 39:5,10,11,15 39:16 124:20 covering 99:15 covers 17:6 147:24 critical 14:18 cross 122:8,9 122:12,13 crosswise 117:12,15,23 118:22 119:3	131:18 csr 1:25,25 5:11 160:22 current 14:17 14:17 cursor 65:24 cut 10:14 53:11 57:23 58:9,17 59:23 60:4,5,6 60:6,9,11,12,19 60:21,22,23 61:2,3,5,8,9,13 61:16,24,25 62:1,4,7,7,8,9 62:10,16,21,23 63:1,4,6,7 65:11 67:25 68:8,19 70:4 77:6,7 78:7 128:14 129:16 130:4,5 145:2 145:7,19 149:4 149:9,13,15 150:4,7,8 cutter 148:22 cutting 68:16 68:16 76:18,23 118:13,18,18 118:22 148:13 148:15,17,19 148:21,23,25 149:1,18 cv 8:22 15:19 16:24 26:20	cylinders 13:4 13:5 d d 3:1 4:1 6:3 date 43:3 dated 42:22,25 david 3:14 147:20 day 13:10 160:20 days 27:9 156:16 december 1:18 4:5 159:21 160:5,20 decide 48:10,14 decided 16:15 16:19 decision 33:9 33:12 35:13,17 declaration 8:10,14,18,21 16:24 20:24 21:3,10 26:8 28:6,15,22 29:6,18,20,23 29:23,25 30:2 31:10,11,15,19 34:1 35:4,23 36:5,11 37:15 37:18,23 38:1 38:21,24 39:6 39:11,16 41:12
--	---	--	---

41:14,16 43:24 45:20,22,25 46:13 47:16,21 47:25 48:2 49:15 50:6,18 53:13 63:12,18 65:19 71:23,24 73:13,17 87:8 100:14 102:3 139:24 141:25 147:4 151:8 152:8 157:8 declarations 31:7,9,17 decline 16:14 deep 148:17 deeper 65:12 default 80:8,14 96:6 105:13 127:21 134:14 155:13 defend 5:5 defendant 36:24 define 63:4,7 defined 47:5,20 definition 58:25 87:7 degree 8:25 9:3 9:5 delgatty 31:11 dense 90:22 120:20 121:4	department 15:16,17 16:20 16:23 departments 16:20 depending 11:17 78:5 98:6 124:15 159:15 depends 4:7 63:8 89:24 90:4,19 159:10 159:15 depict 154:5 deposed 6:5 deposition 1:14 4:6,14 13:19 24:14 45:19 159:21,22 160:5 describe 129:4 described 151:3 describes 100:22 describing 129:16 159:2 description 3:8 54:13 55:24 design 22:8 26:17 60:10 70:23 90:20 119:24 120:2	designated 18:11 designed 60:9 designing 9:25 designs 13:25 despite 106:11 106:14 detail 23:2 143:16 details 23:6 26:3 determine 85:7 86:10,12 determining 23:23 develop 9:22 19:9 20:13 developed 17:11,12 20:17 86:1 115:2 116:7 155:23 developing 9:25 10:1 development 9:21,24 developments 85:20,22 86:5 87:2 differences 119:11 different 10:15 10:15 11:8,8 11:20 13:25,25 14:1,3,3,6	24:24 28:20 42:5,18 53:1,4 54:6,7 56:19 63:5 82:1 88:19,19,20,20 89:5,11 90:7 91:11 100:9 101:23 104:18 105:10,21,22 106:5 115:2,11 115:13,14,15 117:13,23 125:14 149:4,9 152:1 153:8 155:17,18,23 156:23,24 159:12 difficult 138:9 138:13 dimensional 137:15 138:11 138:23,25 direct 44:16 directed 157:20 direction 70:14 70:15,15,15 71:16,18 89:17 120:11 144:18 149:24 directions 120:8 disagree 96:5 discarding 123:10
--	--	---	---

disclose 91:3 99:19 113:20 150:22 152:22 153:11 154:8 155:6,9 disclosed 58:15 93:15 106:12 106:15 107:20 124:4,12 125:1 127:13 129:23 155:4 discloses 59:9 59:11 97:1 100:20 140:7 141:4,4 144:11 152:24 155:7 155:12 disclosing 52:18,19 93:18 156:8 disclosure 83:1 150:18 157:4 discontinuous 70:25 discuss 26:1 29:18 34:11,21 59:19 89:7 90:2,7 141:13 discussed 3:19 21:5,7 29:21 29:22 39:21 42:1,11 75:19 82:18 90:1 102:6	discussing 25:23 44:25 92:7,9 99:21 110:14 118:9 123:13 132:6 140:6 158:21 discussion 78:2 79:8 80:5 89:4 discussions 146:14 dispute 19:22 19:23 37:9 42:18,19 distance 116:10 116:24,25 distinguishing 119:7 distorted 139:7 139:8 district 30:22 37:2,2,9 divulge 24:17 document 3:17 8:7 34:15 35:5 36:13 37:5,7,8 37:14 48:18 50:17 133:15 140:20 141:22 143:1 147:13 158:10,19 documentatio... 28:5 documents 7:18,21 22:16	22:23,24 28:21 28:25 29:1,7 29:11,11,17 30:3,15,25 32:4 33:17 38:16 42:6,7,7 42:17,21,25 43:11,14,25 44:10,10,12,17 44:24 45:1,5,8 45:10,14,21 46:5,8,11,17 47:3,7,15,25 49:2 62:25 83:25 105:6 112:18 146:13 146:16,22 doing 24:15 124:5 dollars 14:15 dotted 66:20 double 55:17 56:2,7 57:11 57:16 58:3,3 73:21 75:12 76:10 84:20 98:9 doubt 88:17 dr 4:14 5:5,13 5:23 6:6 7:16 24:12 31:16 41:7 73:11 110:4 139:23 142:13 152:6	157:19 drain 14:23 drainage 14:7 drains 12:4 draw 71:12,18 drawing 60:7 drawings 55:25 drawn 60:18 145:21 drive 2:4 dry 13:2 14:24 dryer 11:23,24 drying 13:1,1 duly 5:17
			e
			e 2:1,1 3:1,7 4:1 4:1 earlier 116:17 120:9 121:22 143:2,5 145:9 146:12 150:17 152:21 153:10 153:18 154:11 155:17 156:2 early 34:9 41:12,13 45:11 easier 65:17 easy 59:4 edge 128:19 edition 3:14 educational 8:24

either 46:5 149:7 159:19 elaborate 96:21 144:7 element 60:15 90:12 111:4,5 111:6 120:12 120:13,14 122:15,17 123:22 129:15 129:16,17,23 130:1,3,5,5,7 137:12 140:8 elements 53:1,4 54:7,14 55:9 55:10 58:5,5,7 58:23,24 60:15 61:10,12,15,19 62:10 73:23 77:15,19 89:11 91:11 95:2,4 96:6 102:25 104:19 105:14 105:17 107:2 107:14 116:13 116:14 119:22 119:23 120:15 120:16,18 122:21 126:24 144:13,13,15 144:15,21 150:19 embodiment 56:8 106:16	130:23 embroidering 100:8 105:18 embroidery 85:3 99:8,16 100:8 102:15 102:16 105:12 105:13,25 106:3,4,7,9,14 106:16,17 109:10 124:5,7 124:9 126:18 127:3,16,19,20 127:21,23 159:13 emily 1:25 5:10 38:5 74:10 160:2,22 emphasize 77:21 emphasizing 106:9,10,11,14 ended 25:20,20 ends 76:19 77:7 engineer 9:21 22:10,10 28:1 engineered 11:14 17:2 engineering 9:1 9:4 15:16,17 16:16,21 26:13 26:13 81:24 engineers 28:9 81:10 83:11	england 27:18 enrollment 42:5 enters 13:19 entire 118:22 131:12 entirety 33:17 envisions 73:22 equal 102:19 102:20 equipment 16:7 error 100:12 101:19 escape 124:6 escaped 101:14 especially 22:9 115:1,4 esq 2:3,8,9 et 3:10 14:2,8 52:13 69:1 89:24 europe 27:11 85:19 evaporated 13:6 everybody 84:10 evidence 39:20 43:25 exactly 33:25 71:6,9 143:13 143:14 150:10	exam 62:24 examination 3:3,4 5:21 142:21 examined 160:7 example 29:19 31:7 47:6 48:22 54:20 55:1,23 57:8 60:22 71:1 77:13,18 81:18 85:11 99:6 100:4,6,22 101:1,5,10,12 101:13,21,25 102:13 104:15 107:13 111:5 118:23 120:9 120:20 125:17 examples 101:22 except 61:19 84:16 109:3 110:8 excerpt 96:24 97:13 115:8 121:9 128:23 129:13,21 134:7,16 135:11 exchanged 21:7 exclude 78:9
---	---	--	--

excuse 7:17 9:8 18:21 36:22 53:25 63:11 66:5 79:2 108:23 112:7 115:24 123:25 124:2 127:2 133:9 137:8 exert 132:1 exhibit 3:8,9,11 3:13,15,17,19 8:3,14,19 28:17 32:9,12 32:15,18 33:8 34:5 35:3,9,13 35:16,20,22 36:2,4,7,10,16 37:12,20,22 38:9,18,20,23 39:2,4,8,10,13 39:15 42:11 50:21,22 51:1 51:4,17,24 52:1,3,12,14 54:25 74:2,9 74:11,12,21 78:13,14,20,22 79:2,4 107:13 107:19 108:1,5 108:9 115:18 115:19 139:24 142:23 147:5 148:2,3 151:22 152:9	exhibits 3:19 28:6,16,22 32:6,13,20 39:21,22 41:11 42:10 48:24 54:20 83:20 104:9,12 146:13 exists 88:6 expected 86:3 expensive 14:11,18 118:23 119:20 119:25 120:2 120:18 122:25 123:5,10,22 125:15 experience 86:20,21 87:6 97:12 105:4 112:21,23 expert 18:10,11 18:15 35:8 experts 23:10 87:18 explain 61:11 100:13 101:18 102:20 143:15 144:10 explained 102:23 explaining 141:16,25	explicit 96:12 explicitly 119:6 extend 110:18 111:1,9 126:16 126:21 127:2 extending 111:19 extends 126:18 extra 111:4,7 111:10 116:25 123:17 124:3 124:11,17,17 124:18 125:1,5 126:11,12 extremely 14:11,18 88:9 extruded 16:18 extrusion 16:10 17:7 f fab 144:9 fabric 12:4,4,5 12:6 13:5,23 14:3 16:8,10 16:11 18:17 25:18 53:10,18 54:6,7,10,14,18 54:22,23,24 55:4,4,5,8,10 55:18,19,19,21 55:23 56:3,4,8 56:13,15,16,17 57:1,4,4,7,12	57:16 58:2,6,6 58:8,22,24 59:3,6 60:17 61:8,16 68:15 70:8,9,12,13,17 70:20,24 71:2 71:10,11,13,14 71:17 76:9,10 79:22 80:9,9 80:25 82:23 89:16,19,21 90:9,15,20 91:1,8,12,13 94:11 95:1,3,5 95:5 97:23 98:4,4,8,9,23 98:24 99:5 102:24 103:2,3 103:4,5,7,17,18 104:5,15,16,17 105:15,16 106:5 107:4,15 109:5 115:14 116:6,9,14,21 120:10,16,17 120:25 121:6,7 121:7 122:9,16 122:18,22,22 122:25 124:4 124:12 125:1 125:16 126:11 126:23 133:19 133:19 134:13 134:14,15
--	--	--	--

135:6 136:7 143:5,21,25 144:12,12,14 144:19 145:3,4 148:9,19 149:2 149:5,7,8,15,16 149:16,16,17 149:20,24 150:1,3,3,7,7 150:12 155:8 155:12,13 156:9 fabrication 68:15 fabrics 9:16,19 9:20,22 10:1,1 10:4 11:9,11 11:12,14,15,20 11:20,24 12:19 12:20 13:14,16 13:17,18,25 14:10,11,14,14 14:18 15:4,9 15:20 16:8 17:3,12,13,14 17:16,18 18:2 18:18 19:2,6 22:5,7 23:14 23:16,19,20 24:4,22 52:19 52:19 53:2,4,9 70:10,16 81:14 81:20,20 86:19 91:6 93:11,12	102:12 105:11 105:23 106:3 107:1 111:24 112:10,10 125:8,9,10,11 125:12,13 128:2 139:1 148:16 150:9 151:1 face 131:10 faced 76:10 facility 25:25 26:1 fact 14:24 27:8 71:10 88:4,6 96:19 115:1 148:10 factor 44:3,8 factored 44:2 facts 59:4 fall 86:25 familiar 148:7 far 44:23 131:6 131:14 fast 86:2 fastened 128:18 faster 90:22 feel 24:14 96:20 feet 12:7 felt 46:18,23 fiber 9:6 10:21 10:22,23 11:1 12:13,23 13:8	15:19 16:15,16 82:21 fibers 10:19,21 10:21,23 11:5 12:3,6 13:7 15:20 16:9,17 17:2,6 22:6 68:23 115:3 139:1 155:19 155:24 field 10:10 85:10,10 87:3 fig 56:1,6,14 101:6 130:23 figs 53:20 99:24 100:23 figueroa 2:10 figure 52:21,25 53:1,25 54:1 54:13 56:5 57:23 58:13,16 59:1,1 60:3 62:15 63:9,12 63:17 69:6,14 69:18,19,22 70:5 72:3,9,12 79:15,21,22 89:2,3,5 90:8 91:16 92:7,9 92:12,12,13 94:15,17,18,19 97:1,12,16,18 99:12,13,13 102:4 103:12	106:20 108:12 109:4 110:15 110:17,18 111:1,5,7 114:17 116:1 116:13,19,23 120:4,5 122:8 122:9 123:2,3 126:16,17,19 127:6,7,7,7 144:23,24,25 145:1 146:2,7 151:13,16 153:20,22,24 154:1 158:9 figures 69:2,4,8 92:12,12 99:14 116:2,5 120:3 120:5 122:6 123:14 143:22 145:19,20 148:10 151:12 154:3,5 file 41:4 73:9 110:1 126:4 139:19 157:16 filed 31:24 filled 116:11,25 filter 14:23 filters 11:14 final 76:4 86:25 finals 25:20 financially 4:20 160:12
--	--	---	--

find 19:6 71:23 94:16 100:15 fine 64:10 67:9 109:18 125:21 finish 90:14 finished 86:24 150:2 firm 19:9,12 20:5,8 firms 19:15 first 5:17 9:20 10:12 13:15 18:11 20:20 21:18 26:10,21 27:2,16 34:10 36:22 40:6,6 40:15 55:3 74:20 75:2,7 106:6 109:21 140:17 141:20 fit 146:10 five 40:23,23 55:9 73:1 125:20 129:1 fixed 55:5,19 91:9 138:12 fixing 128:16 137:22 138:2 flat 25:4,13 flexible 17:2 81:25 flip 33:16 floor 2:10	focus 103:9 focused 115:8 folded 59:25 62:11 128:17 129:17 130:7 131:10 132:9 133:3 135:3,16 136:4,6,16 137:3,17 folding 59:11 59:14,17 follow 64:6 85:20 87:2 122:12,20 followed 148:20 following 26:22 follows 5:19 foot 132:2 137:16 138:4 football 10:10 footwear 17:11 17:19,22 19:9 20:13,18 23:21 23:25 100:21 136:25 force 138:20,20 forces 138:22 138:23 139:1,6 forefoot 131:2 foregoing 160:9 forget 45:14,17 45:24	forgot 46:3 form 10:13 11:9 30:5,23 33:19 40:3 43:15 44:6 45:9,16 46:1 46:21 48:7 53:5 57:25 58:19 59:13 71:7 75:13 79:9 84:6 96:14 117:13 129:8 131:12 135:9 138:7,9 138:14 139:6,7 144:1,20 145:6 146:9 153:4,14 156:10 159:9 formation 10:2 11:13 13:21 16:11 89:20 formed 12:8 89:19 90:18 104:5 132:21 132:22 133:4 134:1 138:22 forming 9:16 9:18,20,22 10:1,4,12 11:11,12,20 12:4,9,11 13:14,16,17 15:9 46:17 47:3,8 125:8,9	125:10,11,12 128:2 found 152:12 four 9:20 16:4 16:5 27:3,4,6 27:14 55:9 60:14,15,20 61:15,15 63:20 63:22 92:20 98:3 99:1 frame 43:12 44:14 freedom 23:6 fringe 76:11,18 76:23 77:3,5,6 77:24 78:5,6,7 fringed 68:25 fringes 68:25 front 7:19,22 8:5 36:19 39:2 55:5 116:22 fujiiwara 51:12 51:16,21 full 6:1 103:21 151:21 152:10 152:16,18 160:10 fully 115:2 155:23 further 141:6 142:12 159:19 160:12
--	---	---	---

g	glue 10:20	105:14 142:15	guessing 70:2
g 4:1	go 4:12 8:11,12	142:17 143:8	guide 3:14
gain 107:7	8:13 27:13	146:3 148:6	guided 148:21
gap 76:2 77:23	34:17 40:22	152:15	148:23
77:24 120:13	46:22 49:14	good 4:4 5:9,23	günther 113:19
garment	50:21 54:19,19	5:25 40:20	114:6 116:2,5
148:23 149:4,5	55:23 56:10	72:25 104:6	116:18 117:19
150:5	71:22 73:13,16	141:11 147:24	119:4,8 121:20
gauze 120:24	74:23 81:6	grades 86:25	122:3,6 123:8
120:25,25	89:1 90:15	graduate 17:1	123:18,20,23
121:6,7	102:4 103:25	graduated	124:4,12 125:1
general 23:19	104:2,13,23	26:16	127:1,9,13
25:9 117:9	105:7 106:7,20	graduating 9:8	128:5,6 140:23
139:2 140:14	107:10,20	grammar	141:1,1,4,7,13
generally 25:24	108:11 109:14	101:11	141:17 142:1,4
145:23 158:13	109:21 113:25	grant 31:11	142:8,11
generate 68:25	117:1 118:2,12	gray 54:8 64:22	157:25
geometries	120:3,3,4	great 64:11	günther's
82:1	121:9,24 123:3	66:9 72:23	113:7,8,11,14
geometry 61:22	134:16 139:3	73:4 74:6	113:14,17
62:15,17,21,23	140:1,19,21	green 54:8	114:9,15
63:1,1,4,5,7	141:21 142:17	greenville	115:16,17
german 3:17	143:15 156:20	26:25 27:7,10	117:22 126:22
117:10,18	157:9	27:15	128:1 140:13
germany 27:19	goal 123:15,25	ground 157:23	155:11,11
getting 26:3	goes 12:16,25	grounds 51:9	158:23 159:7
gibb 1:25 5:10	90:22,23 158:8	growing 71:17	h
160:2,22	going 6:15,16	guess 12:19	h 3:7
give 71:23	7:7 24:10	24:9 29:20	h2m3 61:20
101:22	40:19 57:17	68:22 90:1,2	half 125:11
given 14:13	61:16 65:16,16	92:20 99:16	158:8
59:8 96:22	65:21 69:3	116:8 123:8	halfway 156:21
	72:24 74:6,7,9	124:16	
	78:12 95:6		

hand 5:13 148:21 handbook 3:13 happy 7:5 64:8 head 6:19,19 63:2 heading 31:21 32:22 heard 4:9 heated 13:2,4 heel 131:4 held 27:14 help 82:6 88:24 112:15 helped 18:12 helpful 17:9 28:12 58:11 helps 88:15 high 11:18 12:21 52:18 116:4 125:15 highlighted 53:20 highly 11:14 historical 16:2 16:4 hmm 57:2 69:23 99:3 137:13 holding 10:20 home 15:1 horizontal 144:18	hour 40:20 72:25 houses 94:24 huh 141:2 hundred 16:6 i idaho 160:4 idea 114:15 ideas 21:7 identification 50:23 52:2 74:13 78:15 115:20 identified 29:5 29:8,10,11,13 29:15 36:10 46:14 99:25 100:24 identify 21:9 29:14 57:19 61:1 105:5 109:12 identifying 117:22 ii 122:7,24 123:4 iii 122:11,19,20 122:24 image 107:18 impacts 141:17 142:1 important 13:18	impossible 45:12 improve 85:24 improvement 141:1 142:10 improving 113:13 123:20 123:23 142:4 inch 10:22 include 40:1 49:13 61:10,12 62:3 158:9 included 16:17 24:4 30:1,19 39:24 40:10 48:1 77:16 111:15 152:7 155:14 includes 17:13 60:4 119:15 including 90:25 independent 57:10,14 63:22 146:22,24 147:1 independently 42:7 indicate 57:6 137:9 indicated 58:25 80:12 122:15 indicates 12:18 55:22 77:13 134:25 136:6	137:20 140:13 indication 125:7 130:15 133:24 individual 10:19,23 58:5 128:14 145:2,5 individually 34:5 industry 9:23 10:3 16:15 19:3,5,7 22:4,5 26:23 112:14 121:2 inexpensive 118:20 information 19:2 24:18,19 40:12 47:15,24 48:4,18 83:22 83:22 information's 26:6 informs 141:7 ingrid 29:20 31:11 insertion 156:15,16 inside 91:11 93:13 insight 135:12 install 81:9,12 82:7 83:12
--	---	---	--

installing 82:5 institution 35:13 inter 3:9 interested 4:21 160:13 international 26:24 27:12 internet 4:8 intersection 67:8,16 intersections 67:20 intersects 67:5 67:12 introduce 5:7 34:16,17 74:7 78:12 introducing 38:5 invention 56:9 113:9,12 114:25 118:6,9 119:7 140:25 155:10 involve 21:23 49:5,11,25 involved 21:25 24:23 31:8 50:13 112:1,1 138:22 involving 30:13 30:16 48:25	ipr 7:22 21:12 31:21,24 32:1 32:5 33:5 35:13 47:24 48:17,22 49:10 49:11,12,25 50:1,7,10,13,15 51:17 146:16 ipr2025-00141 1:5 4:16 iprs 30:14 42:3 43:6 48:25 49:5 irell 2:3 5:4 irell.com 2:6 ishia 31:12,12 issue 44:18 49:11,12 50:1 50:14 51:17 issues 44:25 istanbul 9:1,2 itm 27:22 itma 27:11 j j 2:8 3:14 jacquard 84:19 jet 88:5 jlindsay 2:6 joined 68:8,18 jonathan 2:3 5:3 journal 83:25	journals 26:15 jumping 152:6 justify 124:17 125:16 k karl 54:20 83:21 91:7 107:13 keep 6:19,20 99:17 105:20 138:9 139:6 keeping 38:7 124:19 keeps 57:17 kept 124:9 127:8 kevlar 18:2 kilpatrick 19:13,14,16 20:9 21:23 kind 17:16 22:6 22:7,7,8 28:3 86:18 104:15 105:15,22 107:1 112:10 kinds 15:23 16:7 kitchen 14:21 knit 70:22 71:4 73:22 102:23 122:14,21 132:6 143:11	knits 144:19 knitted 17:14 53:18,19 56:3 56:7,13,15,16 57:12,16 59:3 60:16 70:8,9 70:10,16,17 75:14,18 76:9 80:1,5,6,17 86:18 98:3 102:23 114:3 121:7 132:25 137:1 143:5,20 154:23 155:5,7 156:8 knitting 3:13 16:11,12,12,13 17:13,14,15 23:18,18 24:5 24:5 25:3,4,4,5 25:7,10,13,15 54:21 56:20 70:11,12 78:3 79:8,10 80:10 80:24 84:23,24 84:24 85:5,10 85:11,12,14,15 85:15 86:7,16 86:17 89:13 91:7 96:11 98:8 99:9,16 99:20 100:7 101:1 102:18 103:1,9,11,25
---	---	---	--

104:1,4,24	44:18,25 45:2	88:7,8,13,14,18	132:24 133:1
105:11 106:10	45:11,18,21	89:8,8,12,16,18	133:18 134:4
106:11,22	46:4,12 47:13	89:22,23 90:3	134:10 135:8,9
110:21 111:2,3	48:16,21 49:17	90:11,21 91:7	135:19 136:2,2
113:17,20	50:16,25 52:15	91:8,9,13,21	136:6 137:24
114:1,3,10,13	52:23 54:16,19	92:4 93:9,10	139:7 140:4
114:14 115:12	54:23 56:4	93:24,24 94:1	142:10 143:15
120:5,7 124:13	58:23 59:20	94:2,18,21,25	144:10,17
125:2,3,4	60:6,7,8,10,13	96:17,20,21	146:6 147:22
126:22 127:4,5	60:16,18,20	97:3 98:7,19	147:24 148:1
127:12,18	61:7,9,16,18,19	99:5,8,15	149:21 150:13
128:3,7,8	61:20 62:4,11	100:2 101:9,10	150:14 151:3
133:1 140:7	62:22 63:2,3	101:12,21	151:13 159:14
144:6 147:21	63:14 64:5	102:12,22	knowledge
147:21,23,25	65:15 67:25	103:3,5 104:2	91:17,20
147:25 148:1,9	68:13,19,24	104:6,17,18	112:21,23
151:2 156:6	69:5,25 70:2,3	105:3,13,19	known 73:20
157:5 159:13	70:5 71:10,11	106:23,24	83:3 84:2
knives 148:21	71:12 73:14	107:2,8,8,14,17	112:12 117:10
know 6:17 7:5	77:14,16,21,22	107:17,23,25	118:21 119:2
7:11 8:4,15	78:5,17 79:5	108:14,17	knows 80:16
11:16 14:4,12	79:13 80:3,20	109:3,4,10,16	89:9
14:15,16,17,20	80:23,24 81:4	110:24 111:18	I
14:22 16:3,8	81:6,7,9,10,15	112:2,12,14,15	label 72:13
19:5,6,22 20:5	81:18,19,20,25	113:6,8,15	labs 15:22,23
21:16 23:1,17	82:5,6,12,15,22	114:2,12,15	lady 29:20
23:22 24:10	83:5,6,7,11,14	115:22 119:23	laid 53:9,10
25:9 26:11,11	83:19,25 84:5	120:7,12,13	lakes 11:3
28:10 29:13,14	84:7,10,18	121:3 122:21	larger 53:10
31:6 34:1	85:11,25 86:3	123:8,9,19,21	54:18 58:2
36:18 38:12,16	86:7,13,18	124:14,22	laser 60:21,22
40:6,9,9,23	87:1,5,8,10,10	125:4,4,7,13	149:10
42:5,7,21 43:6	87:17,20,20,21	126:21 128:11	
44:9,12,13,16	87:21,22 88:1	130:5,19	

late 45:11	97:2,10 105:8	lengths 148:15	line 32:9 55:24
latest 85:20,21	107:10,20	level 52:18	56:10 59:2,19
86:5 87:2	108:11 109:1	116:4	65:11,12 66:5
law 17:25 18:6	110:18 111:1	liability 20:2	66:8,9,12,23
18:22 19:8,11	111:10,20	liba 54:20	67:5,11,12
19:15 20:5,8	117:14 121:24	83:21 91:7	69:17,18 71:12
lawyer 18:1	126:16 127:2	license 5:12	71:12,19 72:19
20:7	128:15,17	lift 12:14	80:25 89:13,21
lawyers 22:22	131:3 137:20	light 66:19,24	90:10,17,17
23:12	137:22 138:2,3	67:2,4,11,15,20	91:2 92:3,18
lay 148:18	layouts 94:21	67:21	92:19,21,22
layed 148:16	101:3 103:22	lightweight	94:23,23 95:1
layer 98:5,9,10	103:23,24,25	118:20	98:20 99:2,22
99:5 103:2,6,6	104:3,23	lignin 10:20	99:23 114:20
103:7 105:16	106:20 152:1	lindsay 2:3 3:4	114:22 117:4
108:15,19,19	153:2 156:23	5:3,3 24:10	117:22 118:3
109:5 116:21	lays 148:20	30:5,23 33:19	118:12,13
116:21,22	leading 146:4	40:3 43:15	121:10,11
123:12 125:6,9	150:11 153:4	44:6 45:9,16	128:11,13,25
125:10,12,16	156:10	46:1,19,21	130:19 136:12
125:17 127:2	learn 85:21	48:7 53:5	136:13 145:12
154:16,16	86:4	57:25 58:19	145:15 154:20
155:7	leave 81:15	59:13 71:7	155:2
layers 99:6	109:16	79:9 84:6	lines 32:14
102:12 116:23	left 65:4 90:13	96:14 109:20	62:11 68:20
123:12,17	90:16 104:17	113:22,25	91:10 94:5
124:3,11 125:1	116:20 123:4	129:8 138:7	95:6 96:25
125:11 126:11	legal 44:10,12	142:15,22	97:6,13 129:5
127:1,13 128:1	44:17,24 45:1	144:3 146:4,11	129:14,22
128:6 154:23	146:13,16,22	147:3 150:16	132:15 133:10
layout 92:5,25	legs 90:12,13	153:7,9,16	133:23 134:7
94:9,13,15,15	90:14	156:19 157:18	134:17,18
94:17,19,20	length 78:6	159:17	136:1 137:19
95:8,12,20,22			154:15 155:15

155:16 linguistic 102:1 list 30:19 listed 15:19 16:23 26:20 28:6,7,16,18 29:2,16 32:6 51:5,9 83:21 listen 140:17 litigation 23:5 30:12,21 39:21 42:2 47:25 146:17 litigations 30:14 43:6 48:25 49:5 little 61:11 82:10 llp 2:3 logical 63:4,6 long 10:9,17,22 11:16 13:11 82:23 109:20 148:17 149:25 longer 11:17 52:8 longitudinal 149:24 look 8:3 22:4 32:21 35:19 37:12,20 38:9 39:1,8,13 51:23 52:21 53:13,14 54:21	55:12 59:18 65:7 66:17 67:19 68:3 69:2,4,9,16 71:11,22 72:12 76:4 79:15 83:20 97:16,17 97:17 112:9 114:19 115:16 116:1,19 122:6 122:7,10,24 128:10 130:18 136:11 139:12 145:1,17 148:5 151:21 152:5,9 looked 22:11 22:15 24:8 28:4 looking 24:1,9 32:8 44:4 58:13 60:3 63:9,11 65:8 89:3 121:10 123:17 124:1,2 124:10,25 126:10 128:5 looks 38:14 60:9 69:9 70:6 72:21 loom 115:2 155:23 156:12 156:12,13 los 2:11	lost 115:24 lot 44:22 138:13 lots 11:2 26:14 26:19 28:4 138:20 low 17:25 lower 32:21 128:19 lunch 109:17 109:24 110:6	134:15 135:13 135:20,24 136:8,21 137:2 137:11 143:25 149:23,23 150:1,4 156:13 machinery 15:23 22:11 24:3,6 26:23 27:1,12,21 28:2 81:7 85:18,21 86:4 86:18,22 machines 9:23 16:12,13 17:15 17:15 19:3 22:5,16 23:17 23:18,24 24:5 24:5,8,9,21,22 24:24,25 25:2 25:3,4,4,5,7,11 25:11,12,13,15 25:17,23 26:1 28:2 54:21 56:20 58:4 70:11,12 73:21 80:24 81:1,2,4 81:11,16,17,21 81:21 82:1,13 82:16,18,22 83:6,10,12,14 84:8,11,14,19 84:20,21,23,24 85:1,1,11,12,14
---	---	---	---

85:15,15 86:1	81:14,20,22	87:19 98:7	118:21,24,24
86:8 87:10,11	82:3,4,8,10	100:10,21	119:2,15,19,24
87:21,23,25	83:9 84:11	101:23,24	120:19,20,21
88:1,2,2,10,11	85:2,4 86:18	105:10,22	123:1,4,10,21
88:14,22,23	88:1,13,18,25	144:16,17	142:5 144:21
93:10 104:24	91:5,6,11	mark 38:6	149:12 151:25
106:25 107:16	101:10,20,21	marked 3:19	152:3,25 154:6
111:21 112:11	101:25 106:25	50:22 52:1	154:8,17,22
115:13 149:3	127:22 151:1	74:12 78:14	156:22,25,25
151:3 156:13	makes 138:14	115:19 148:20	158:22 159:7
156:14,17	making 13:13	149:6,8 150:6	materials 23:7
made 10:7	13:14,25 14:9	marker 149:7	26:9 36:11
17:17 19:2	80:9 90:9 98:9	market 81:3	42:1 43:5
54:16 58:7	102:11,22	85:13 112:16	44:21,22 105:4
59:6 61:17	103:2 150:5	master 9:3	116:12 125:5
84:23,25 89:10	man 104:16	master's 26:16	matter 4:14
99:20 104:19	manager 9:25	match 67:22,23	82:4
105:16 106:4,4	manella 2:3 5:4	67:24 68:3	mayer 54:20
116:14 126:19	manufacture	matched 56:12	83:21 91:7
126:20 134:13	119:20	matching	107:13
145:4	manufactured	145:11,17	mean 28:16
main 50:19	71:14 89:6	material 57:11	29:19 30:7
majers 2:14	90:8 97:8,10	77:11 78:3,25	31:4,6 33:14
4:17	104:5 144:14	82:21 90:7	34:18 41:19
make 7:8 9:22	manufacturer	92:6 93:6 94:3	43:3,16,22,22
10:10 11:2	82:6 83:11	94:7,10,11	45:10,20 47:17
13:20 14:21	88:14,24	95:13,16,18,21	48:16 51:15
15:2,3,4 16:8,8	manufacturers	95:23,23 96:4	53:6 54:24
24:4,22 38:15	24:25 81:11	96:7 99:24	56:25 61:14
52:20 53:12	83:8	100:24 101:2	62:3,18 75:25
54:17 55:20	manufacturing	107:23 111:4,4	76:1,3 78:10
58:1 60:22	15:22 17:4,7	111:7,11,17	80:15 83:17
62:9,12 65:16	22:12 25:18,25	112:13 115:5	84:7,21 85:17
72:5 77:12	71:17 80:13	117:11 118:20	88:21 93:10

96:16,19 97:4 101:8,25 102:22 103:15 105:3 112:25 113:2,12,13 114:8,16 120:1 123:8 124:6,14 124:16 127:10 130:1 132:25 134:4 146:8 148:25 149:14 means 70:21 75:19,24 77:4 94:3 137:23 138:11 meant 60:5 measures 152:2 156:24 mechanical 8:25 16:21,25 22:9 26:12 28:1 mechanics 28:9 mechanisms 156:16 media 4:13 41:4 73:9 110:1 126:4 139:19 157:16 medical 121:2 meetings 21:5 memory 139:2 mention 61:18 84:17,25	mentioned 47:13 48:21 50:11,12 58:21 61:5 80:12 81:5,7 84:9,9 84:15,19 99:11 103:3 107:12 112:24 113:1,3 113:15 127:9 128:2 142:10 149:10 154:10 156:2 mentioning 100:9 105:21 mentions 97:5 99:18 109:9 113:7 merge 16:20 mesh 54:7 meshes 54:7 71:1 message 38:12 meter 10:9 11:16,16 89:16 120:10 method 85:3 98:7 100:20 103:4 119:22 122:3 123:9 127:14 128:6 methods 105:10,22 159:13,15	michael 2:8 5:1 michael.sebba 2:12 middle 97:19 131:10 milan 27:16 mill 10:15,16 10:17 16:6,7 85:23,23 million 14:13 14:15 mills 11:3 87:19,19,19 mind 34:13,14 70:6 104:7 125:20 126:14 140:18 141:19 154:19 mine 7:5 minimized 150:14 minute 12:7 147:9 minutes 40:23 73:1 89:24 125:20 139:11 missing 38:16 141:6 misspoke 75:5 137:8 misstates 44:6 48:7 113:22 misunderstood 42:16	misused 101:16 mixed 10:25 11:1,5,6 mixture 12:3 mm 57:2 69:23 99:3 137:13 modification 83:9 88:2,13 88:17 modify 159:6 modifying 158:21 moment 8:12 71:23 103:10 115:17 153:18 154:13 158:3,5 money 111:13 111:17 months 9:21 34:10 40:7,15 morning 4:4 5:9,23,25 move 95:2 moves 71:12 moving 71:19 80:25 90:17,17 91:2 multilayer 103:2 118:24 154:17 155:5,9 155:13 158:23 159:7,14 multiple 51:8 58:22,24 128:1
---	--	--	---

128:6 154:16 156:8 munich 27:18	144:18 needles 89:15 89:18 94:24 needs 8:12 neighbour 76:13 nevada 160:3 new 28:3 81:15 82:20,24 83:18 84:1,21 100:2 113:4 139:7,7 156:16 newport 2:4,5 newsprint 14:1 nike 1:7 2:7 4:15 5:2 19:25 30:12,21 36:22 36:23 37:8 42:2,3,4,18,19 nike's 42:14 nishida 34:11 34:21,25 49:22 50:7 51:13 78:13,23 79:4 79:7,15 80:4 81:5 84:5,8,9 84:16,22,25 85:4 89:2,3,3 90:6 91:3,15 91:24 93:16 96:12,25 99:15 99:19 100:20 100:22 102:4 104:20 105:6,9	105:19,24 107:20 108:12 109:1,3 110:14 110:15,17,19 111:1 113:6,13 114:13,19 117:1,3 118:3 118:9 119:6,11 119:14 120:4 120:22 121:13 121:14,18,19 122:3,5 123:11 123:15,17,20 123:25 124:1,3 124:9,11,19,25 126:11 127:1 127:14,17 128:5,7,10,13 129:14,22,23 130:19 133:23 134:19 136:25 140:7,12,13,23 141:4,17 142:2 142:3,6,9 150:18,21 151:22 152:9 152:22,24 153:11,17,22 153:24 154:1,8 154:13 155:4 155:15 156:7 157:25 159:12 nishida's 126:16,17	140:25 158:22 159:7 nods 6:19 nontechnical 46:9 north 9:4,6,7 64:4 note 4:6 31:24 140:11 141:6 notes 139:12 142:18 160:9 noticing 4:25 number 75:13 115:3 121:4 numbered 74:21 75:8 numeral 116:20 122:7 122:11,19,24 123:4,5 nv 1:25
n n 2:1 3:1 4:1 6:3 name 4:17 5:10 6:2 12:17 19:11,14 52:16 64:7 86:14 149:12 160:20 naming 60:18 narrow 25:12 necessarily 75:21 87:16 96:16 123:19 necessary 46:12,24 48:5 48:10 112:3 125:3 need 11:2 40:8 68:19 70:3 89:7 90:1 107:21,23 109:2 111:6 112:13 119:21 128:3 142:16 158:11 needed 68:14 needle 55:17 58:3 73:21 75:12,15 89:14 89:14 94:24			o o 4:1 o0o 1:3 4:2 oath 4:19 160:7 object 24:11 objection 30:5 30:23 33:19 40:3 43:15 44:6 45:9,16 46:1,19,21 48:7 53:5 57:25 58:19

59:13 71:7	okay 6:13 7:16	65:10,21,24	114:19 115:11
79:9 84:6	7:21 8:2,7,9,11	66:2,15,18	115:16,24,24
96:14 113:22	8:23 10:4,6	67:2,7,10,15,19	116:3,4,16
129:8 138:7	15:7 17:9,19	67:24 68:6	117:1,2,3,18,21
144:1 146:4,25	18:6,9,20 19:8	69:2,6,7,11,16	118:2,4,5,8
150:11 153:4	20:1,5,11,13	71:22 72:2,5,8	119:2,6,14,18
153:14 156:10	21:18,22 22:20	72:12,19 73:16	120:1,22 121:1
159:9	23:7 24:8,20	73:19 74:2,6	121:17,18,22
objections 4:22	26:5,8 28:12	74:16,19 75:10	122:2,11
objects 56:20	29:4,17,24	75:18 76:4,22	123:15,24
56:21	31:21 32:8,14	77:20 78:2,12	124:10,22
obligations	33:14 34:3,11	78:19,19 79:2	125:18 126:7
24:13,16	34:24 35:12,22	79:7,16,19,21	126:14,25
obliquely	36:16,21 37:4	80:19 82:9,17	127:11 128:4
131:18,18	37:7,12,17	83:1 84:3 85:7	128:10,13,22
observe 28:2	38:3,15,20	87:13 89:1	129:1,4,12,19
obsolete 156:15	39:1,4,8,13	90:6 91:3,15	130:15,18,22
obtained 10:24	40:24 41:15,25	91:19,24 92:7	131:8,16 132:5
obtaining 9:10	42:12,15,15,17	92:10,14,16,21	132:10,14
obvious 80:16	42:25 43:5	93:5,14 95:6	133:17 134:16
97:4,5 157:24	46:7 49:16,19	95:11 96:10	134:24 135:7
159:1,6	49:25 50:4,9	97:9,19,21,24	135:11,23
obviously	50:20 51:4,15	98:12,17,21,24	136:9 137:7
58:23 138:21	51:22 52:7,12	99:7 100:11,18	139:13,25
october 45:22	52:14,17,21,25	101:17 102:6	140:3,11
offered 83:7	53:3,13,15,17	103:9 104:2,22	141:15,23,24
office 1:1 2:9	53:24 54:3,9	105:5 106:11	142:6,19,23,25
officially 3:19	54:12,15 57:22	106:19 107:5	147:8,13 148:2
oh 7:17 19:15	58:11 59:3,11	108:2,7,21	148:5,7,11,14
31:14 38:15	59:22 60:3	109:12,20	150:17 151:7,9
42:12 56:25	61:1 62:6 63:9	110:9,22,24	151:16,24
74:23 129:1	63:13,16,23	111:8,14,18	152:5,12,19
135:18 141:9	64:6,13,18,21	112:4,18,22	153:17,17
	64:25 65:3,7,9	113:5 114:6,19	154:14 155:8

157:8 158:10 158:14,18,20 159:17,20 old 16:23 113:10 older 156:13 once 7:12 10:23 11:5 12:1 36:14 45:20 83:10 90:9,14 99:11 102:9 134:11,25 135:14 136:6 150:2 ones 99:20 146:18 open 34:15 44:11 51:2 52:10 54:25 55:3 84:10 90:21 99:17 105:21 115:25 121:3 124:20 142:23 148:2 152:20 159:12 opened 39:22 44:11 opening 12:5 70:24 operation 115:5 opinion 146:1 opinions 39:18	opportunity 44:21 option 126:13 127:8,17 optionally 154:22,25 options 99:17 105:21 124:20 oral 160:10 ordinary 80:23 86:14 156:7 oregon 160:4 orei 52:13,14 52:16,18,19,21 54:12 55:22 57:5,18,22 58:15 59:9,11 61:2 63:17 69:4,8 72:3 73:22 81:5 104:20 142:23 143:19 144:10 144:23 orei's 53:18 143:24 original 89:1 139:3 originally 68:7 136:3,20 outcome 4:21 160:13 outer 62:11 outline 148:22	outlines 148:20 outside 14:24 17:20 131:3,5 131:9,20 own 15:1 38:7 42:7 119:7 owner 1:8 96:20	paper 9:22,23 10:2,2,3,7,7,11 10:13,13,16 11:2,3,7,7,10 11:13 12:1,2 12:12,14,18,19 12:22,25 13:2 13:4,5,9,21 14:1,2,2,12,20 14:21 15:1,3,4 56:12 125:14 125:15 149:8,9 paper's 12:18 papermaking 10:6 14:19 papers 14:22 125:17 149:7 paragraph 31:18 33:1 49:15,19 53:14 53:15 73:17 76:4 77:13,17 100:16,19 118:8 130:22 131:24 132:5 140:2,11,16,17 140:22 147:5 147:11,15 148:11 151:8 151:10,11,15 155:16 156:11 157:10,20 paragraphs 141:12,16,19
--	--	--	---

141:24 147:10 158:4,6,7,13 parallel 91:10 paris 27:17 part 10:6 20:14 22:11,11,13,14 23:10,14 40:1 54:17 55:10,20 59:23 60:10 72:9 78:25 79:1 82:15 83:2 87:14 90:16 105:1 121:22 128:14 128:17 129:17 130:6,8 131:2 131:4,12 132:8 132:10 133:7 135:3,5,15,16 136:2,9,9,15,15 136:16,18,18 136:20,21,22 136:24,24,24 137:2,2,7,9,16 138:10 140:12 140:22 141:3 145:10,12 148:23 152:7 154:21 155:25 partes 3:9 partially 79:25 participants 4:9	parties 4:12 47:5 48:25 160:12 partly 59:14 82:15,17 142:3 142:7 parts 17:8 46:16 53:11,11 53:19 57:5 58:9 61:14,15 61:18 77:14 80:10 84:11 85:4 88:20,25 90:18,25 93:3 94:4 122:25 132:9 143:20 143:24 145:2,5 145:15,22,23 146:3,8 153:11 party 4:20 24:17 pass 120:12 passage 117:21 129:5 132:15 133:8,10 passing 120:15 122:13,14,15 122:16,17,21 past 27:23 pastor 31:16 patent 1:1,2,8 3:11,15,17 18:14,25 19:1 21:12,15,19,24	22:19 30:4,13 30:13,16 31:25 32:23 33:4 48:17,17 52:13 78:23,23 81:5 82:19,21,25 83:2,17,18,19 84:1 85:6 89:8 90:2 96:20 98:11 99:12 102:9 106:10 109:6,7 113:7 114:11 117:10 117:18 124:20 patents 21:25 28:23,24 30:18 81:5,16 84:16 87:11 100:3 104:21 path 131:25 pattern 56:2,2 56:7 60:7,8 149:6 patterns 56:12 56:12,15 117:13 pause 157:11 pdf 8:15 51:5 71:25 104:14 pdfs 115:25 pending 7:12 30:12 people 28:8 31:7,8 81:10	81:13 82:7 83:13 87:17,17 percent 10:25 11:1 12:13,13 12:23,24 13:8 13:8 perform 39:19 45:15 46:9 performed 41:15,20 permeability 14:7 person 45:2,12 63:8 76:1 80:22,22 85:22 86:14,17 87:8 87:9,9 89:9 112:2 124:5 156:6 personal 80:22 perspective 41:17,22,23 43:8 44:5 petition 3:9 34:6,12 48:17 49:21 petitioner 1:5 2:2 ph.d. 1:15 3:2 9:5,10,12 26:17 160:5 phones 22:18 phrase 28:19 143:5
--	--	---	---

physical 60:12 61:9,13 70:21 71:3 88:17 143:10,20 144:5 picture 55:13 55:14 91:14 104:6 105:20 108:4,9 pictures 54:22 59:7 91:8 107:11,25 piece 60:8,13 64:11 69:18,19 69:25 72:13,13 72:16,19,20 76:17,23 79:8 79:11,24 80:5 80:6 81:23 89:10,10,11 94:22 102:25 103:17,18,21 103:21,23 104:19 120:23 144:15 pieces 54:17 55:20 59:5 60:15,20 61:7 62:1,3 68:24 69:14 70:4,6 79:24,25 80:10 80:13,17 82:4 91:22 93:13 106:7 144:15	pink 54:8 64:21 64:21 place 4:11 25:25 56:20,21 57:3 61:5 70:25 100:18 127:10 placed 3:19 56:13,16 58:5 160:7 placement 71:4 143:10 144:5 places 58:21,25 plaintiff 36:23 plan 56:1,6 planar 132:7,9 132:16,20,22 133:2,2,5,6,6,7 133:9,11,19,21 133:22 134:2,5 134:11,14,15 134:25 135:4,4 135:8,12,14,15 135:20,24 136:3,6,8,22,22 137:9,10,12,17 137:20,25,25 138:3,6,15,18 plane 128:18 128:22,24 129:2,18 130:9 130:10,12,14 130:16,17 135:17 137:18	planer 136:4,5 plant 25:25 81:13 83:13 plants 87:20 plastic 17:8 plastics 17:8 please 4:6,22 4:23 5:7,13 6:1 6:18 7:5,11 49:8 52:16 140:21 141:21 142:23,24 151:14 plurality 101:3 ply 148:16 point 7:11 44:9 44:14 101:11 102:1 points 158:13 polymer 9:6 16:16,17,19 26:13 polymeric 17:5 polymers 16:9 139:2 porter 2:9 5:2 portion 130:6 portions 54:6 61:10 67:2 94:20 105:6 133:6,21,22 posita 43:12 44:15 59:5,9 67:23 80:15,20	83:5 85:9,19 85:22 86:3,7 86:12 87:7 93:18,18 96:17 97:5,7 106:2 107:16 111:23 111:23 133:18 134:4 141:7 position 98:19 possible 84:25 85:2 103:4 106:17 138:17 138:19,20 practical 3:14 predate 107:13 preferably 131:25 premarked 149:8 prepare 22:20 prepared 20:24 21:2,8 preparing 26:8 28:15 35:4,23 36:5 37:15,18 37:23 38:1,21 38:24 39:5,11 39:16 41:16 43:24 45:25 47:25 present 2:13 56:9 presentation 50:18
---	---	--	---

presented 45:5 45:8 49:6 51:19 press 11:19,20 11:22 12:10,16 12:17,19,20,22 148:21 pressure 12:21 132:2 pretty 81:23 82:8 156:15 previous 138:22 previously 114:24 prices 14:17 printed 117:15 prior 21:9,10 22:13 29:5,24 29:25 31:6,24 32:1 35:4 39:20 41:17,21 43:8 44:7 48:8 48:25 49:1,5,6 49:11,25 50:9 50:19 51:19 146:16,21,23 160:7 privileged 24:18 probably 29:12 29:14 47:9 62:22 84:17 96:20	problem 52:9 68:23 problems 68:21 proceeding 8:4 30:16 49:6 51:20 146:18 proceedings 30:4,6,7 157:11 160:8 160:10 process 9:21,24 10:7,17 13:11 13:12 21:2 22:12 65:17 77:11,12 78:4 78:24 80:16,21 82:12 84:9 100:1,25 102:12 103:8 105:18 106:6 114:11,25 115:14 117:5,9 118:5 124:9 140:14 155:18 processed 10:14 processes 9:22 17:7 22:16 85:24 100:3,10 101:23,24 produce 22:4 55:9 80:25 87:22 88:20 93:12,12,23	111:22 152:1 156:23 produced 17:12,16 19:6 22:7 23:17 70:10 77:22 91:1,4,10,23,25 92:4,24 93:2,3 93:6,11 94:6,9 94:13,22 95:1 95:8,12,23 96:3,7,8,8,18 97:2 99:25 100:24 106:5 107:2,15 112:11 117:11 150:22 152:22 produces 91:16 producing 14:25 28:3 78:24 94:1,3 102:24 152:25 153:11 product 9:24 18:15 132:7 159:16 production 90:3 152:2,3 156:24 products 17:8 20:2 28:3 75:12 77:13 professional 160:3	professionally 9:11 professor 15:10 15:18 86:23 program 81:14 83:15 88:15 148:24 programming 88:18,19,19 programs 19:4 22:8 24:6,7 progress 21:7 project 20:1,6 20:14 projects 17:20 18:9 26:17 pronouncing 31:12 proof 61:21 properties 14:8 15:21 115:14 125:14 prove 56:16 provide 127:14 133:24 135:11 158:25 159:8 provided 101:2 131:3,5 provides 125:6 134:7 providing 18:24,24 19:1 publications 26:15 62:25
---	---	--	--

published 26:15 pull 78:17 115:17 152:9 pulp 10:14,17 pumped 11:6 12:3 purchase 81:9 81:19 83:10 84:11 87:25 88:21,22 purchaser 88:12 purchases 88:10 purpose 77:25 146:8 156:22 purposes 6:23 pursue 111:14 put 68:1 70:4 71:1 112:7,7 115:4 127:23 135:14 138:21 145:19 146:8 149:7 150:4,4 putting 70:5 105:17	quarters 51:9 question 6:25 7:4,12 26:4 28:14 34:19,20 38:4 43:17 45:6 49:8 58:12 89:2 107:6 108:3 109:15 112:5 129:12,20 143:7,17 144:4 144:7 149:14 150:20 152:16 153:8 questions 6:17 7:6 142:12,16 143:4 152:15 159:18 quickly 33:16 quite 28:12 58:12 107:5 108:2 112:5 116:7 129:19 quotation 78:1 quote 74:20 75:2,7 152:7 quoted 100:16 quoting 102:3	raschel 25:16 54:21 55:17 56:3,7 57:12 57:16 58:3 73:21 75:12 rather 101:9 119:23 ratio 10:25 11:6 12:12,13 12:23 13:7,9 raveling 68:22 read 22:18 35:5 35:5,9,12,16,25 36:7 40:11 45:18,21 47:10 73:25 83:17 129:5,9,13,21 133:14 140:17 141:19 143:8 147:9 148:11 151:20 152:13 158:11 reading 140:16 158:15,17 reads 49:20 114:23 117:8 118:17 128:13 really 24:23 44:8,16 77:14 77:19 82:24 84:20 88:11 89:7 97:4 106:9,10 159:12	realtime 143:8 reason 61:24 62:6 101:12 104:22 121:23 124:3,11,24 reasoning 140:12 reasons 68:12 88:8 112:17 158:25 159:8 recall 17:17 20:19,20 22:15 22:18 23:25 29:3 33:25 40:5 47:14,23 50:3 62:20,24 106:1 153:18 recent 43:14 recently 43:7 62:22 recess 41:2 73:7 109:24 126:2 139:17 157:14 recognize 8:7 recollection 36:12 147:10 158:5 record 3:20 4:5 4:12,25 5:10 6:20,23 34:17 40:14,22,25 41:4 73:5 75:6 109:23 110:1
q	r		
qualifications 87:9 quality 4:7,8 119:23 125:15	r 2:1 4:1 6:3 raise 5:13 raleigh 9:7		

125:25 126:4 139:15,19 157:12,16 160:10 record's 8:17 63:16 recorded 1:14 4:10,13 recording 4:7 recordings 4:11 rectangular 54:24 149:2 recycled 14:22 reduce 142:4 reed 34:25 49:22 50:7,9 50:17 refamiliarize 158:12 refer 8:18 21:15 32:15 52:14 62:16,21 63:23 64:4,9 64:18,25 66:7 67:7,15 74:19 77:10 79:2,4 95:17 99:1 103:8 120:23 reference 34:12 34:21 50:14 100:23 147:19 147:24	referenced 48:2 153:19 references 51:16 62:1 referred 50:17 92:17,22 102:8 102:8 128:22 145:10 referring 8:19 21:16 25:8 52:15 60:24 61:13,22 62:14 63:17 64:5 65:1,5 66:4 67:12,17 70:18 70:19 77:15 79:5 92:24 93:5,21 103:16 119:3 155:22 refers 33:1 95:19 98:23 120:22 refresh 34:13 147:10 158:5 region 122:7 registered 160:3 regular 125:4 reich 3:17 relate 157:4 related 4:19 15:20 17:22,25 18:2,12,23 19:24 31:1,5	39:21 48:19,21 49:2 92:4 94:8 94:12 95:7 113:16 160:12 relates 71:3 143:9 144:5 relating 30:4 relation 19:19 44:17 relevant 48:11 48:14 106:16 relied 26:10 49:21 50:7 83:1 rely 26:20,20 28:7 50:9 105:6 113:3 relying 112:18 112:21,22 remains 128:15 remand 33:9 33:11 35:17 remember 18:5 18:16 19:11 20:12 35:1 46:4 62:18 72:6 143:4 145:9 146:14 146:18 151:5 remind 24:16 remote 1:14 remove 10:19 12:21 13:3	removed 58:8 133:12,25 134:11 135:1 150:3,3 rendered 39:18 repeat 34:20 43:18 45:6 49:8 129:12 140:15 repeated 27:3,4 report 18:19 21:8 22:20 46:24 47:3,8 47:13 49:13 78:1 reported 1:25 160:5 reporter 5:6,9 5:11 6:18 14:5 160:3,3 reporter's 160:1 reports 22:23 47:10 represent 77:19 represented 101:5 representing 4:17 5:2,4 represents 97:22 102:6 118:19
--	---	--	---

requested 160:15,17	160:16,17	63:21,22 64:18	120:24 121:9
requirements 111:24	reviewed 28:23 30:1,3,15,17,18	65:8,10,18,22	121:13,25
research 15:13 15:18,24 26:14 26:19	30:25,25 32:4 32:7,12 33:18 33:23,25 34:7 36:12 37:4 40:7,16 41:11 42:1,17 43:5 43:10,14 44:1 78:19	66:4,8,9,11,18 66:23 67:5,10 67:16,21 68:4 68:7 69:17,19 70:22,23 71:5 72:3,4,10,11,14 72:15,17,18,21 72:24 74:3,17 74:18,21 75:3 75:8,16,20,22 76:20 77:8 80:14,15 82:14 82:20 83:3 87:14 90:8,11 90:14 92:1,8 93:1,22 94:12 94:14 95:9,13 95:18,25 96:4 96:12 97:14 98:14 102:7 104:25 105:1 106:21,22 108:17 109:8 110:14 111:11 111:15,16 114:22 115:9 115:10,17 116:1 117:21 117:25 118:6 118:10,17,25 119:4,8,10,12 119:16,20	122:4 126:12 127:15 128:20 128:23 130:18 131:6,14,22,23 132:3,11 134:20 135:18 135:21 136:10 136:15,16,19 139:10 140:9 140:14,19,24 141:13,21 143:11 145:11 146:18 147:6 147:16,17 150:20 152:4 156:4 157:23 159:17
reshape 138:13 139:5	reviewing 35:3 42:6,6 133:15 140:20 141:22 147:13 158:10 158:19		rivers 11:3
respect 47:18 146:1	revolution 86:1		rocket 88:7
response 143:12	right 5:13 15:11,12 18:5 18:7 19:20 20:3 21:1,13 21:14 31:13 32:2,10,15,16 33:9 40:5,19 41:12 42:3,23 43:1 47:21 48:5 49:3,7,14 49:23 50:3,7 50:20 51:8,20 51:21,23 52:10 52:17 53:22 54:2,10,11 57:18,20 59:12 60:1,4 62:18		roll 55:4,5 149:16,16,25 150:1,3,7,12
rest 13:3 92:25 92:25 97:11 137:10			rolls 12:21
resulting 70:22 71:4 78:25 131:17 143:11 144:6			roman 116:20 122:7,10,19,24 123:3,5
returning 41:10			room 148:13,15
review 3:10 22:13 23:14 26:9 28:15,21 29:2,24 30:20 31:9 32:17 33:11,17 34:8 34:18 35:22 36:4 37:14,17 37:22,25 38:20 38:23 39:4,10 39:15 44:21 45:3,12 160:15			rotate 11:15,18 11:21,25
			rotating 12:7
			roughness 14:8

rounds 13:5 rows 59:18 rpr 1:25 160:22 rules 6:16 run 6:15 81:8 82:7 87:22 running 120:7 runs 12:19 131:17	92:4 93:20 94:8,12 95:7 95:11,19 96:2 97:19,24 98:19 99:4 109:7 117:4 129:2 130:17 137:21 142:9 143:8 154:16,21 155:22 156:21	50:24 51:23 52:6 53:7 58:10 59:10,16 71:21 72:24 73:4,10 74:15 78:16 79:12 84:12 96:23 109:18 110:3 114:5 115:21 125:21,23 126:6 129:10 138:16 139:10 139:14,21,22 142:12 144:1 146:25 150:11 153:4,14 156:10 159:9 159:19	131:2,4 140:6 157:10 158:4 158:21 159:8 section's 159:2 sections 10:10 11:8 76:11 secure 76:19 see 21:18 31:15 31:21 32:24 33:6 36:18,21 38:11 44:16 51:8 52:4 54:23 55:13,18 57:22 64:2,16 64:23 65:13,19 65:22,24 66:13 66:18,20,25 67:5,13 69:6 69:17,20 75:23 76:6,14 81:8 84:16 93:8 97:19,24 98:14 100:21 104:10 108:16 111:9 115:6 117:6,16 118:15 123:1 130:24 134:9 135:25 144:23 151:8,11,16,18 154:16,17,21 154:23 155:1,3 155:20,25 157:2,21 158:1
s	scale 145:21 146:7 scarf 76:9,17 76:23 scarfs 77:14 schematic 55:15 science 9:3,4,6 26:14 88:8 scissors 60:21 screen 65:16,25 69:3 seam 131:17,25 seamed 77:7 78:7 seaming 76:19 sebba 2:8 3:3 5:1,1,22 15:6 25:1 30:9 31:2 33:21 38:4,8 40:13,19 41:6 43:19 44:19 45:13,23 46:6 47:1 48:9	second 20:1 49:19 113:9 125:6 148:12 151:13 seconds 89:24 section 10:12 10:12 11:11,19 11:22,23 12:9 12:11,11,17,17 12:22 13:1,1 13:14,15 32:8 60:25 61:22 74:20 75:3,7 76:5,19,24 77:3,7 122:8,9 122:12,13	
s 2:1 3:7 4:1 6:3 131:19 sabit 1:15 3:2 4:14 5:16 6:3 160:5 saddled 138:23 saved 133:20 saving 120:19 saw 38:4 saying 26:5 33:15 58:24 60:11 93:17 108:4 113:19 119:10 121:18 123:20 130:4 132:14 140:22 149:19 says 36:21,22 36:23 37:1 54:13 55:25 56:11 57:8 59:3,22 76:8 76:16 86:14			

seeing 65:18	several 6:9	138:25 139:3	101:4 116:6
seems 155:12	11:24 16:12	145:10,11,11	117:14 120:18
seen 4:9 43:25	17:12,13 21:4	149:2,3,20	122:14,17
115:1	27:13 40:7,15	150:5	123:22 128:16
selected 131:25	46:5 68:11	shaped 78:24	128:18,19,23
sell 10:3	79:24 149:21	78:25 117:14	129:2,6,15,18
selling 14:9	sewing 145:22	130:7 137:14	129:24,25
semester 25:20	sewn 145:6,7	137:24,25	130:1,2,8,8,11
send 22:25	145:16 146:3	138:4,4,15,17	130:12,16,17
senior 26:17	shaded 57:7,19	148:22	131:4,11
sens 13:22	shading 72:8	shapes 60:16	132:16,21,22
sense 7:8	shakes 6:20	63:5,20,22	133:4,11,20
101:10,20,21	shape 54:24	149:5,6,6,13,15	134:2 135:10
101:25 138:14	59:24 60:6,9	149:18 150:6,8	135:15 137:3
sensitive 13:23	60:12,18,24	shaping 128:16	137:16,16,22
sent 18:17	61:3,20,25	137:21 138:1,2	138:2,4,6,10
20:15 22:22,24	63:25 64:4,12	share 3:19	139:8,9 143:20
29:1,7,17	64:14,19,21,22	65:16,25 74:10	143:24 144:13
31:17 38:14	65:1,3,4,8,8,10	112:16	144:15,22
sentence 49:19	66:5,8,10,11,16	sharing 65:19	145:2,5,6
74:20 75:2,7	66:19,22,23,24	69:3	146:9
77:17,25 94:5	67:4,4,8,10,16	sheet 12:8,10	shoemaking
95:7 97:6	67:20,21,21,22	shoe 17:17 19:2	23:19
114:22 117:4	68:7,7 79:23	22:5 24:4	shoes 17:22
118:13 152:10	82:8 101:4	25:18 52:19,20	18:1,2,3,17,17
separate 10:18	129:6,15,23	53:2,4,9,12,19	18:18,18 20:15
60:14,15 106:6	131:19 133:4	54:14 56:1,2,6	20:15 24:4
separated	133:20 135:4,9	56:12 57:9,15	52:20 69:12,13
10:24 76:17,22	135:10,14	59:12,25 60:23	111:25 112:8
76:23	136:3,4,5	61:17,23 62:9	short 22:23
seq 3:10	137:15,15,16	62:12 69:10	41:2 64:7 73:7
set 138:12	138:4,4,5,6,11	77:14,15,19	126:2 139:17
setting 53:3,6	138:11,12,14	78:24,25 79:25	157:14 158:3
	138:21,22,24	80:7 93:1 97:1	

shortened 138:10	81:7 85:21 86:4,22 116:13	91:4,16,23,25 92:5,25 93:3,4	110:24 111:9 111:14,18
shorthand 160:2,8	shuttle 156:14 156:15	93:17,20 94:2 94:9,13,23	112:8,20 121:23 122:2
show 26:24 27:10,22 54:15 54:25 69:9 79:21 85:18 91:8 104:6 107:19 108:14	shuttles 156:14 sic 147:5 side 24:3,6 48:12,12,19 49:3 55:16 68:1,1 72:21 75:14,14,18,18 75:24,24,25,25 76:2,3 77:22 77:23 78:10,10 90:11,13,14,16 101:5 107:3,3 116:20	95:8,17,20 96:3,8,18 97:2 97:8,11 102:25 140:7 150:23 152:23,25 153:12	123:16 124:1,2 124:10,24 127:12 128:4,4 134:10 135:19
showed 107:11 107:12,18	singer 125:9 single 56:4 89:11 101:3 108:19 125:17 154:16 155:4,7 155:9 156:9	sit 47:23 61:1 sitting 75:25 six 134:22 154:15	skills 86:17 slide 114:24 slope 65:12 slower 90:23 slurry 12:2 small 70:24 smaller 55:20 software 19:4 sole 59:25 128:18,23 129:2,7,15,18 129:24,25 130:9,10,10,14 130:17 131:2,4 131:12 132:2,8 132:10 133:7 135:17 136:9 136:15,24 137:5,7,9,10,18
showing 52:25 53:1 54:4,5,9 56:1,6 95:3 116:9	sides 133:3 signature 160:15,16,17 160:22 similar 104:20 104:21 145:18 similarly 6:23 simple 118:19 simply 58:4 81:19 simultaneous 60:17 93:25 150:20 simultaneously 58:7 73:23 75:14 77:22 80:11,18 91:1	size 11:17 149:22 skechers 1:4 4:15 5:4 20:20 30:12,21 36:23 37:9 42:2,18 skill 80:23 86:14 156:7 skilled 41:18,22 44:20 45:4,7 82:12 83:3 84:4 85:8 87:5 106:23 107:8,9 108:22,25	smaller 55:20 software 19:4 sole 59:25 128:18,23 129:2,7,15,18 129:24,25 130:9,10,10,14 130:17 131:2,4 131:12 132:2,8 132:10 133:7 135:17 136:9 136:15,24 137:5,7,9,10,18 somebody 75:25 sophisticated 81:22 86:2 88:3,6,7,10 sorry 8:11,17 18:6 19:15,16
shown 56:14 57:23 58:16 59:7 69:7,25 79:25 83:23 89:5 90:8 91:13,16 95:4 97:1,11 99:12 99:14 103:11 103:20 104:15 107:25 108:16 108:16 116:4 123:13 127:6,7 127:10 128:1 143:21 144:13 153:19			
shows 27:5,6 27:22 28:10 55:16 79:22			

26:2 31:3 33:20 34:19 42:15,15 46:20 52:4,5 58:20 61:11 65:15 71:8 74:16,22 74:23 75:5 80:1,2 92:3 94:19 96:15 98:13,25 109:14,15 113:24 115:23 121:17 125:19 134:22 141:10 147:1,12 152:6 sounds 6:14 south 2:10 26:25 27:7 speak 6:24 41:8 specific 23:20 25:6,7 26:1 28:17 30:8 56:23 81:21 90:24 105:5 149:20 specifically 28:14 57:18 58:13 90:6 91:24 110:15 133:16 134:3 specification 109:6,7 specified 78:8	specifies 61:2 97:3 specify 105:9 105:24 132:12 132:15,19 135:15 speed 11:18 89:25 90:4,20 spelling 101:15 spencer 3:14 74:3 75:19,22 77:10,10 78:2 147:15,18,19 147:20 spinning 16:10 16:11 spoil 68:13 square 79:23 80:5,6 89:10 90:11 103:20 squeezed 12:20 standard 81:2 start 6:25 7:16 8:2 18:25 34:5 63:24 65:7 81:12 83:13 88:24 89:12 90:9,10 95:2 108:23 started 15:17 16:18 21:5,6 33:24 41:13 starting 24:14 26:12,24 99:23	114:22 117:4 117:22 121:10 121:16 130:19 140:1 starts 10:13 12:1 92:20 118:5,13 130:22 148:12 155:16 157:10 state 4:22,24 6:1 9:4,7 33:2 85:12 91:25 stated 99:2 110:17 113:13 statement 96:12 states 1:1 3:11 3:15 9:2 37:1 75:11 stay 136:5 stayed 27:9,9 staying 153:17 stays 135:4,15 136:4 137:17 steam 13:2 stenographic 5:11 step 29:4 67:3 79:13 101:17 stie 59:24 stitched 53:12 62:12 stitches 144:20 144:20	stitching 59:15 59:17 stockton 19:13 19:17 stop 69:3 stopped 27:5 straight 94:25 street 2:10 strength 12:15 124:18 125:5 126:12 127:14 strike 154:4 strip 76:10 stripe 66:20 strips 76:12 117:12,15,23 118:22 119:3 strong 11:14 stronger 111:5 126:21 structure 90:21 90:22 102:23 104:16 107:22 108:15,18,20 109:5 111:15 113:16,18 114:7,9 120:18 121:3,4 124:7 125:6 127:23 132:25 133:2 133:13 134:1 134:12 135:2,4 136:7,22,22,23 139:8 140:8
---	---	--	--

150:19 159:11 159:14 structures 17:2 17:5 73:24 81:25 82:24 83:23 85:2 100:10 106:4 107:24 108:13 109:11 111:22 114:2,3 137:12 155:5,7,9 student 26:16 students 15:25 17:16 25:10,22 88:4 stuff 15:1 25:10 styles 156:25 subject 28:10 subjects 25:21 submit 45:22 submitted 41:14 45:20 86:25 subscribed 160:19 substantially 134:2,4 subtle 81:22 successively 117:12 suggest 77:1 108:10 suggestion 64:8	suite 2:4 summary 13:10 13:11 summer 27:23 supervised 26:16,17 support 11:9 11:10 105:7 134:8 135:23 supported 135:25 suppose 74:8 supra 100:22 sure 28:19 30:10 34:16 35:2 38:15 42:9 43:20 49:9 53:8,8 55:2 56:24 63:3 70:3 74:23 79:13 82:10 104:8 109:18 126:15 129:11 145:18 surface 14:7 98:22 surfaces 116:9 116:10 surround 120:23 surrounded 103:24 surrounding 53:11,19 54:5	54:10,14,18 55:10,19,21,23 56:17,25 57:4 58:2,6 60:17 61:8,16 70:20 73:23 79:22 80:9 90:15 91:1,12,13 94:2,4,11 95:5 97:23 98:7,23 98:24 102:24 104:17 105:15 107:4,15 116:14 120:16 120:16,17,23 122:16,18,22 122:22 123:21 126:23 133:12 134:1,12 135:2 140:8 143:21 144:12,19,21 145:3 150:9,13 150:14,19 surroundings 62:10 93:23 swear 5:7 switch 16:15 sworn 5:18 symmetry 68:12,14,14 t t 3:7 6:3	table 150:4 tables 148:17 take 4:11 7:10 7:13 18:20 109:16 115:16 125:19 139:10 139:11,11 145:1 147:9 148:5 158:3,5 taken 1:17 41:2 73:7 126:2 139:17 157:14 160:8 talk 23:1,6,10 23:12 28:8,17 34:4 74:8 110:6 135:5 talked 22:17 talking 8:2 41:10 58:23 113:2 114:12 114:13 126:7 130:10,12 146:19 156:12 156:17 talks 58:22 114:10 155:17 task 22:19 taught 25:19 25:21 teach 16:22,25 17:3 25:10,13 105:4
--	---	--	---

teaching 15:24 16:18 28:11 86:23,24 87:14 87:16 technical 9:1 44:9,13,18,25 46:8,13,15,24 47:3,4,8,20 48:11,12,15,19 49:2 technician 14:25 techniques 148:19,25 149:1,9 technologically 82:2 technology 3:13 112:9 116:8 tell 5:18 8:23 29:12 38:6 44:24 88:4 98:25 132:18 160:7 telling 86:6 ten 6:10,12,13 139:11 tendency 19:15 terms 32:22 33:3 46:13,13 46:15 47:4,6 47:20 89:23 112:13	testified 5:19 143:1 testifying 145:9 153:5,18 testimony 44:7 48:8 113:23 160:10 testing 15:21 15:22 text 110:9 151:11,12 texted 83:21 textile 9:3 15:16,16,23 16:1,6,7,14 19:5 22:10 24:3 26:13,23 26:25 27:12,21 57:19 73:22,24 81:7,13,24 85:18,23 86:3 86:22 87:19,25 100:1,3,25 115:3 116:13 119:22 133:13 134:1,12 135:1 135:2 140:8,8 150:18 155:23 textiles 16:16 thank 5:23 6:4 15:7 17:9 19:18 24:20 34:3 40:18 59:17 73:12	75:10 79:14 92:19 109:19 110:5 121:8,14 125:24 128:9 139:21 141:9 142:13,14 thanks 139:14 theoretically 15:2 thereof 160:11 160:19 theresa 2:14 4:17 thicker 126:21 thickness 124:18 157:1 thicknesses 148:16 thing 30:24 55:11,12 56:5 122:19 things 83:19 113:3 think 19:13 23:4,5 26:2,4,5 27:17 29:22,22 31:14,16 32:19 40:7,20 46:2,3 46:13 61:4 68:9 69:20 81:23 85:5,9 86:6 88:16 93:18 95:19 96:16 99:1	100:5,6,11,12 100:17,17 101:16,18 102:1 104:10 104:22 105:19 106:1 110:16 112:2 113:9 114:9 119:13 124:8,15,19 127:5,8 129:19 145:10 149:11 156:3 158:9 third 3:14 thirty 92:20 thought 52:8 thoughts 21:6 thousands 89:17 120:10 three 9:13 10:10 11:8,22 31:17 51:9 60:14 79:25 86:4 100:9,9 101:23 105:10 105:21 117:12 125:12,16 137:15 138:11 138:23,25 159:12 tier 100:4,5,11 100:12,17 101:9,9,9,13,14 101:18,21,25
--	---	--	---

time 4:23 14:13 14:13 18:21 19:14 21:21 27:8 34:9 40:20 43:12 44:14 45:15 49:9 50:5 62:20 72:25 73:9 80:12 82:23,23 83:5 87:10 88:23 90:3 93:6 94:4 94:7 111:22 112:13,20 116:8 129:9,20 133:14 142:13 148:1 152:2 times 6:8,9,11 timewise 80:11 timing 79:8,10 80:6 89:4,8,23 90:3,3,19,23 tip 59:23 tiptoe 59:24 tissue 14:1 15:1 title 18:16 78:24 titled 75:3 today 5:24 6:16 47:23 88:6 99:21 142:13 143:2,5 145:9 146:12 150:17 154:11 155:17	159:5 together 10:21 11:1 59:6 60:16 62:4,5 62:12 68:18 70:4,6 71:13 80:1,1,11,17,17 102:25 144:14 145:6,8,20,22 146:3,9 told 22:3 tongue 93:2 94:2,6 tongues 92:4 92:24 93:21 94:8,12 95:7 95:12,22 96:3 took 27:8 52:8 top 12:6 37:1 55:7 60:14 63:2,25 64:10 64:10,11,11,12 65:8,10 66:4,8 66:10,12,19,22 66:23 67:4,8 67:12,21 68:7 69:17,18 70:1 72:2,12,14,19 89:21 95:4 98:14 105:17 106:6,7 122:9 122:14,20 123:12 127:24 145:10 149:8	torn 16:3 touching 66:22 75:20 76:1,3 77:2,4 78:11 107:3,16 143:24 144:2 144:16 towards 21:20 towel 15:1 townsend 19:13,16 20:9 track 38:7 trade 87:20 89:10 93:10 trademark 1:1 train 81:13 82:7 83:13 transcribed 160:9 transcript 160:10 transcription 160:9 transferred 12:10 transport 148:18 traversing 148:18 trees 10:13,14 trial 1:2 trick 93:9 tricot 25:16	tried 49:4 139:5 true 92:11 132:24 160:10 truth 5:18,18 5:19 160:7,8,8 try 6:24 142:17 trying 19:5 64:7 105:9 124:20 159:11 tubular 118:23 tuesday 1:18 turkey 27:21 27:21 turn 31:18 51:4 139:23 147:4 151:8 154:12 154:19 twenty 129:1 134:20,21,22 two 18:4 20:22 25:16 27:24,24 33:24 60:14 69:12 76:11 79:24 85:17 90:12,13 97:6 99:6 102:12 103:2 105:15 108:15 109:5 116:9,10,21 123:11 125:10 125:11 134:20 134:21 145:22 154:23
--	---	--	--

type 14:2 15:1 15:13 73:22 82:8 84:17 90:4 107:24 117:10 154:17 types 14:1 23:23 25:16 82:21 155:18 155:18 typical 13:9 14:12 typically 35:9 typo 74:4 100:6 102:2	137:3,3,17 160:7 undergrad 17:1 undergraduate 8:25 underlaps 76:12 underneath 104:3 105:8 106:20 107:10 107:20 108:11 109:1 110:18 111:10,20 121:24 127:2 understand 6:21 7:2,4,7,14 8:18 33:3 37:8 43:17 44:10 59:5 64:19 65:1,4 67:16 82:10 83:2 93:19 97:7 107:9 108:23 111:23 112:19 135:18 141:8 149:14 156:7 understanding 19:21 80:20 82:11 84:4 87:4,13 91:15 93:15 96:11 97:10,21 98:2 98:12,17	104:24 105:7 107:7 108:22 108:24 140:23 141:3,16,17 142:1,1,6,7 143:16,19 144:7 146:6 147:19 155:6 understood 8:1 106:3 unfinished 98:22 unit 121:5 united 1:1 3:11 3:15 9:2 37:1 university 9:1,5 9:7,14 15:10 15:15 16:2 17:11,20 unpleasant 132:1 unraveling 68:22 upper 53:2,4,9 53:12 57:11 60:23 61:17 62:13 79:25 93:1 101:4 116:6 117:14 128:16,19 130:1,1,2,8,11 130:13,16 131:4,11 132:13,16,19	132:21,22 133:11,25 134:11,25 135:5,12,20,24 136:18,20,25 137:2,6,8,22 138:2,3 145:6 uppers 80:7 93:21 97:1 us3,895,003 49:22 use 13:9,24 15:24 18:2 22:6 47:2,7 52:16 62:16,25 63:4,6 73:20 81:13,19 83:14 85:1 101:21,22 111:4,6,10 112:12 125:17 128:5 139:6 148:10 156:8 156:14 used 11:9 13:2 14:3 15:24 22:6,8 23:19 23:24 24:3,22 24:24 25:17,18 27:6,13 32:22 38:13 40:11 46:14,16,18,23 47:6,13,15,19 47:24 48:4,13 48:13,20,22,22
u			
u 6:3 117:14 u.s. 16:15 21:12 78:23 85:18 u.s.a. 1:4 4:15 36:24 u.s.c. 3:10 uh 141:2 unconnected 76:12 under 3:10 12:21 103:25 104:23 111:1,4 120:14 126:16 126:18 127:22 127:22 129:17 130:8,8 131:10 132:9 133:3 135:16 136:17			

50:19 56:18 62:20,23 63:3 86:18 87:10 102:16 106:25 111:24 121:2 151:25 156:23 useful 46:12 uses 155:18 using 19:3,4 24:7 55:22 56:2,7 57:11 60:23 61:9 63:8 120:21 122:3 123:11 123:12 148:17 149:9 159:14 usually 121:7 149:2 utah 160:3	versus 4:15 36:22,23 37:8 42:4 vertical 71:18 89:17 120:7,11 video 1:14 4:5 4:10,13 videographer 4:4,18 5:6 40:25 41:3 73:5,8 109:22 109:25 125:25 126:3 139:15 139:18 157:12 157:15 159:20 view 39:19 44:9 44:15,15 56:1 56:6 96:25 101:11 102:1 106:19 110:20 110:23 111:8 121:23 122:10 122:14,20 135:19,24 140:7 157:25 virtually 4:7 visit 25:24 27:20 85:20 86:3 visited 86:22 visualizing 70:5	w wait 6:24 waiting 158:15 waived 160:16 wale 76:11 want 40:22 69:1 70:24 82:9 123:17 125:5 138:24 139:3,11 142:17 147:9 151:20 158:3,4 wanted 112:20 126:20 152:5 152:16 158:12 wanting 68:17 wants 85:20 99:17 war 113:10 warp 16:12 17:15 23:18 24:5 25:5,15 54:21 55:6,7 56:3,7 57:12 57:16 70:11 84:23 85:15 120:6,7 121:4 148:1 washington 160:3 waste 77:11 78:3,6 111:12 111:12,15,20	118:14,18,22 119:11,15,15 119:18,19 121:11,19 122:23 123:10 123:16 142:4 150:15 wasteful 121:25 122:4 watch 81:8 water 10:25,25 11:2,4,6 12:3,4 12:13,21,24 13:3,6,8 14:23 way 16:9 17:7 28:20 38:11 51:9 54:17 55:9,20 56:19 64:9 81:2,25 89:21 90:18 91:5,6,10,22 93:12 96:9 99:13 107:1 116:23 126:23 132:12 134:13 141:5 145:18 150:25 151:1,4 160:12 we've 40:19 66:9,11 72:24 113:2 weaves 117:13 117:23
v			
v 1:6 60:9,18 61:20 variations 85:14,16 varied 116:10 vary 116:10 148:19 varying 116:24 verbal 6:19 veritext 4:18 version 53:25 72:3			

weaving 16:11 84:25 85:1,1 88:5 99:16 100:7 101:1 102:12 103:3,8 105:11 106:18 109:10 113:18 114:4,7,10,11 114:13,14 115:9,11 127:16,19,20 127:25 155:11 156:3,12,13,17 156:18 159:13 web 12:18,18 12:19,22 78:25 92:5 94:9 95:12,16,18,20 95:23 96:3 99:24 100:23 101:2 115:5 117:11 151:25 152:3,25 154:6 154:8 156:22 158:22 159:7 week 25:20,21 86:25 weft 16:12 17:14 23:17 24:4 25:3,3,4,7 25:10,13 70:11 84:24 85:13,14 121:5 147:25	welcome 15:8 41:7 73:11 110:4 went 15:10 16:21 27:2,2 27:10,13,15 150:24 wet 12:12 wide 10:9 11:16 25:12 26:12 76:11 89:16 120:10 144:18 widely 148:19 wider 59:6 width 54:24 55:5,7,8,18 70:13,14 71:13 71:16,20 81:1 89:20 91:9 122:20 149:23 149:23 wife 110:8,12 wisconsin 9:13 9:15 13:13 withdraw 153:7 witness 4:10 5:5,8,17 13:20 14:6 18:10,12 18:16 24:20 30:6,24 33:20 40:4,24 43:16 44:8 45:10,17	46:2,20,23 52:3 53:6 58:1 58:20 59:14 71:8 73:3 74:14 79:10 84:7 96:15 109:19 113:24 114:1 125:19 125:22,24 129:9 133:14 138:8 139:13 140:20 141:22 142:14,19 144:2 146:5 147:1,13 150:12 153:6 153:15 156:11 158:10,19 159:10 160:7 160:19 wondering 112:6 wood 10:13,19 10:21,21 11:1 11:5 12:3,5,13 12:23 13:7,8 word 46:5,5 56:18 62:16,21 62:25 63:6 101:14,15 141:6 words 62:25 68:23	work 9:12 17:10,24 18:1 18:10,10 22:14 80:24 82:13,16 93:10 96:9 104:16,24 107:1 126:22 140:25 151:4 worked 9:21 14:16 17:19 21:22 23:8 working 18:22 19:8 20:6 35:8 85:23 87:18 124:12 125:2,8 works 73:1 91:21,21 world 113:10 woven 79:25 80:2,3 98:4,9 99:5 103:2,2 115:4 120:25 120:25 121:7 126:20 132:25 154:22 155:8 155:11,13 wrapped 149:25 writing 6:18 21:6 written 46:4,4 147:22 wrong 13:21 43:22
---	---	---	--

wrote 18:18 31:23 34:1 101:8	101:8 104:13 107:11 109:9 116:19 125:21 127:16 132:18 137:21 138:8 140:19 141:22 142:15 143:14 150:10 152:12 155:2
x	year 27:8 34:2 40:6,8,15 47:11,11,12
x 3:1,7 70:15	years 9:13 14:16 16:6 20:22 26:23 27:4,4,5,6,14 27:24 28:11 33:24 85:17 86:4
y	yep 125:23
y 70:15 yard 120:10 149:21 yards 149:22 149:22 yarn 16:10,10 82:21 89:15 120:15 156:25 yarns 15:20 17:3 22:6 55:6 55:7 68:23,25 89:15,17 94:24 115:3 116:12 116:13,25 120:6,6,11,11 121:5 139:1 150:2 155:19 156:8 yeah 19:16 29:19 33:23 39:23 50:16 55:3,16 57:3,8 62:3 67:6 77:9 86:21 88:18 92:3 94:8,15 94:15,17 95:17 97:17 100:19	z zone 128:19 zoom 1:17 65:21

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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 court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.