

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3 TESLA, INC,
4 Petitioner, v.

5 CHARGE FUSION TECHNOLOGIES, LLC,
6 Patent Owner.
7 Case IPR2025-00152
8 U.S. Patent 11,990,788

9 ORAL DEPOSITION OF SCOTT ANDREWS
10 OCTOBER 1, 2025
11 VOLUME 1 OF 1
12
13

14 ORAL DEPOSITION OF SCOTT ANDREWS, produced as a
15 witness at the instance of the PATENT OWNER and duly
16 sworn, was taken in the above styled and numbered cause on
17 Wednesday, October 1, 2025, from 10:59 a.m. to 11:28 a.m.,
18 before MICHELLE MINOR, CSR in and for the State of Texas,
19 reported by computerized stenotype machine remotely via
20 Zoom from her home located in Houston, Texas, pursuant to
21 the Texas Rules of Civil Procedure and pursuant to the
22 Current Emergency Order Regarding the COVID-19 State of
23 Disaster.
24
25

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A P P E A R A N C E S

FOR PETITIONER:

Ms. Lydia Raw

ERISE IP

7015 College Boulevard, 10th Floor

Overland Parks, Kansas 66211

Lydia.raw@eriseip.com

FOR PATENT OWNER:

Mr. Michael Pomeroy

COZEN O'CONNOR

1717 Main Street, Suite 3100.

Dallas, Texas 75201

Mpomeroy@cozen.com

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THE REPORTER: Good morning. Today's date is October 1st, 2025. The time is 10:59 a.m. Central Standard Time, and we are on the record.

Mr. Andrews, will you please raise your right hand?

SCOTT ANDREWS,
having been first duly sworn, testified as follows:

THE REPORTER: Thank you.

At this time, will counsel please state your appearances for the record starting with our taking attorney; then, we may begin.

MR. POMEROY: This is Michael Pomeroy for Patent Owner, Charge Fusion Technologies.

MS. RAW: Lydia Raw for the Petitioner, Tesla, Inc., and Erise.

EXAMINATION

BY MR. POMEROY:

Q. Good morning, Mr. Andrews. Welcome back. I recall taking your deposition well over a month ago on August 21st.

Do you recall that?

A. Yep.

Q. And do you recall that being for IPR2025-00032?

A. That's correct.

1 Q. You submitted a declaration and testified under
2 oath for that matter; is that correct?

3 A. Yes.

4 Q. Are you aware that the patent involved in
5 IPR2025-00032 shares the same brief description as the
6 reason you're here for your deposition today, which is
7 both IPR2025-00152 and IPR2025-00153?

8 A. That's correct.

9 Q. Are there any changes or modifications to the
10 testimony you provided in IPR2025-00032?

11 A. One of these -- or maybe both -- has a very
12 minor typo that I would like --

13 MS. RAW: Scott, can you -- I don't -- I
14 think, listen to his question.

15 THE WITNESS: Oh, yes. Go ahead.

16 Q. (BY MR. POMEROY) I'll get to that. I promise
17 I'll ask that question. What I was asking, based off
18 your -- is there any changes or modifications to the
19 testimony you provided in IPR2025-00032?

20 A. Nothing substantive, other than the correction
21 of a typo, yes.

22 Q. All right. Now, regarding your current two
23 declarations, IPR2025-00152 and IPR2025-00153, are there
24 any modifications to your declarations that you'd like
25 to provide today?

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1 A. That's the typo that I was talking about. Give
2 me a second, and I'll try to find it. I can't remember
3 which of the two declarations it's in. Let me try this
4 one.

5 Okay. So, in the 788 declaration around
6 Paragraph 122, I think that the term RAM, R-A-M, should
7 actually be ROM, R-O-M, because I'm talking about a
8 nontransitory membrane device, and so I think that was
9 just a typo.

10 Q. Got it.

11 Anything else?

12 A. I don't recall if that appears in the other
13 declaration, but if it does, that would be the same
14 correction.

15 Q. Okay. Sitting here today, are there any other
16 changes you're aware of?

17 A. No.

18 Q. Other than the claim language, would you agree
19 that the patents that you are here to testify about
20 today and the patent that you testified regarding
21 IPR2025-00032, all have the same specification?

22 A. The specifications are the same. They're all
23 continuations of the same application. Obviously, the
24 formatting and some of the physical layout is a little
25 bit different, but from a -- a content perspective, the

1 specifications are the same.

2 Q. So, if I asked you the same questions regarding
3 the specification that were previously asked in IPR2025-
4 00032, those same answers would apply with respect to
5 the specifications for IPR2025-00152 and IPR2025-00153,
6 correct?

7 MS. RAW: Objection.

8 A. Limited to the content of the specification,
9 yes.

10 Q. (BY MR. POMEROY) All right. If you could pull
11 up the 987 patent for me, and for the record I'll label
12 that as.

13 Exhibit 1.

14 (Exhibit No. 1 marked for identification.)

15 A. All right. I have it open.

16 Q. (BY MR. POMEROY) Could you go to Claim 1 for
17 me, please.

18 All right. So, what's labelled as Claim
19 Limitation 1I, do you see within the claim there's a
20 term called unitary vehicle charge indicator ?

21 A. I don't have the Is on here, but let me look.
22 I'm not seeing it. I'm going to actually move to my
23 declaration because I think we have a list that's broken
24 down in that same way with --

25 Q. That's fine. Whatever is easiest for you.

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1 A. Sure.

2 Okay. Yes, I see that. Wherein, one or
3 more charging preferences, et cetera, et cetera?

4 Q. Yeah.

5 A. Okay.

6 Q. What's your understanding of the term "unitary"
7 in the context of the claims of the 9875?

8 A. My understanding is that the components of the
9 charged indicator element are essentially colocated
10 there graphically or physically related to one another
11 as a -- as a single unit.

12 Q. And what do you mean by colocated?

13 A. They're in essentially the same place. You
14 know, there are a lot of ways that you could imagine
15 implementing indicator element for vehicle charge. And
16 they will essentially -- located in the same place means
17 that there is essentially one thing that you would look
18 at.

19 It may have multiple parts if it's
20 indicating multiple characteristics of the vehicle
21 charge, but it's not like there's an indicator on the
22 left-hand side of the, you know, screen and another
23 indicator somewhere else. It's all essentially one
24 display.

25 Q. Does that display need to be a bar graph?

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1 MS. RAW: Objection. Form.

2 A. According to this claim, there's nothing about
3 a bar graph.

4 Q. (BY MR. POMEROY) All right.

5 A. So, I would say it does not have to be a bar
6 graph, but it certainly could be.

7 Q. Going a little bit further down -- give me one
8 second. I just want to -- okay, Claim Element 1H.

9 A. Okay.

10 Q. Do you see where it says "Transmit at control
11 signal to a parking space charge device that starts
12 charging?"

13 A. I see that.

14 Q. What does "transmit at control signal" mean to
15 you?

16 MS. RAW: Objection. Form.

17 A. Well, the -- in this claim, we have a processor
18 in Claim I -- Element IC, and it's programmed in Element
19 1D to perform a set of steps. And one of the steps is
20 this transmission of a control signal to a parking space
21 charge device.

22 What that means is that a signal is
23 conveyed in some way from that processor to the parking
24 space charging device.

25 Q. (BY MR. POMEROY) Okay. And is it your opinion

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1 that once this control signal is transmitted, the
2 parking space charge device would begin charging?

3 MS. RAW: Objection. Form.

4 A. It may or may not start charging. Claim
5 Element IH says, "Starts a charging in accordance with
6 the charging schedule of the vehicle." And that
7 charging schedule might indicate that charging isn't
8 supposed to begin then. So, it doesn't necessarily
9 start charging when it receives the control signal. It
10 starts executing the charging schedule, and that may or
11 may not involve immediately starting the charging.

12 Q. (BY MR. POMEROY) You rely on Farrow and/or
13 Seelig for this particular limitation; is that correct?

14 A. I'd have to go look at that. This is
15 Limitation H?

16 Q. Yes.

17 A. So, let's see in -- I'm going to go to a
18 section in my declaration. Excuse me a second.

19 I guess the question is which -- is it for
20 the entire limitation in Claim Element IH that you're
21 asking Farrow or Seelig or is it Farrow and Seelig
22 because they -- they apply to different parts of the
23 limitation.

24 Q. Let me change question.

25 Is there any part of the claim that you are

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1 exclusively relying upon Seelig for?

2 MS. RAW: Objection. Form.

3 A. Not exclusively. Seelig offers or describes
4 transmitting a wireless signal, which initiates the
5 charging process. So, he's very explicit in disclosing
6 a signal that -- that meets this claim element. But
7 Farrow also describes at Paragraph 78 -- it's Paragraph
8 78 of Farrow, it's Paragraph 186 of my declaration, he
9 says.

10 "The charging phase begins when energy
11 transaction execution engine 316 sends the transaction
12 plan" and "initiates the request to begin charging
13 electric vehicle." Which it appears to be -- I think
14 it's -- I've misspoke -- it's Farrow, Paragraph 60 and
15 Paragraph 51.

16 So, Farrow describes initiating -- sending
17 something and initiating a request to begin charging the
18 vehicle. He doesn't explicitly state that as a signal.
19 I think a person's would understand that anytime you
20 use send something in an electric system, it is a
21 signal, but he doesn't explicitly call that out.

22 So, I rely on both of them, to answer your
23 question.

24 Q. Understood. With respect to Seelig, is it your
25 understanding that Seelig requires no interaction from

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1 an operator or user to activate the charging device
2 within Seelig?

3 MS. RAW: Objection. Form.

4 A. No interaction or -- I guess I'm not sure what
5 you mean by interaction by the user.

6 You mean touching things on the touch
7 screen to start something, or do you mean participating
8 in some way in the process?

9 Q. (BY MR. POMEROY) If a -- if the charging
10 device of Seelig receives a control signal to activate
11 charging, are there any other steps required in the
12 Seelig charging device to allow that device to charge a
13 vehicle?

14 MS. RAW: Objection. Form.

15 A. I'm going to go -- before I answer that -- get
16 a copy of Seelig from my little file here.

17 Do you know what exhibit number that is?

18 Q. (BY MR. POMEROY) It's 1078.

19 A. No wonder I couldn't find it.

20 Well, Seelig obviously requires the -- I'm
21 not sure if this answers your question -- but requires
22 the driver to position the vehicle. And in Figure, I
23 guess it's Figure 1, there's a little sequence diagram,
24 and the first step is parking it. So, the user has to
25 do that.

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1 From that point on, it appears that the
2 system automatically initiates charging once a vehicle's
3 in the right position, and I don't believe Seelig
4 describes that the user has to do anything else.

5 Q. Can you go to Column 4 for me, Seelig?

6 A. Sure. I'm there.

7 Q. If you go down to Line 51.

8 A. Okay.

9 Q. So, this is for Figure 6. Do you see a line,
10 starting around Line 55, it states, "After the charging
11 device has been activated, for example by a deposit of a
12 coin, a switch on Pulse EI is admitted by the vehicle,
13 for example by way of key."

14 A. I see that.

15 Q. What is your understanding of this activation
16 of a charging device?

17 A. The -- essentially, my understanding is,
18 essentially, that that is one way in which the
19 charging -- charging device, essentially, could be woken
20 up. It's -- it's an arrangement for automated charging.
21 It's not the only one, but the actual start of the
22 charging is created by the vehicle. It's called the
23 switch-on pulse EI admitted by the vehicle, which then
24 turns on the actual charging.

25 Q. Sitting here today, are you -- are you aware of

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1 any other activation mechanism for the charging device
2 in Seelig that's disclosed within the Seelig reference?

3 A. My understanding is that I don't think he -- I
4 don't think Seelig describes any other way of waking up
5 the charging station, but he describes this as an
6 automated charging system.

7 And so I -- I think his example of
8 activating it by a coin is just an example. He doesn't
9 describe what he even really means by activation, but
10 he's very clear that the actual charging process is
11 activated by the vehicle sending a signal.

12 Q. But sitting here today, outside of this coin
13 example, you're not aware of any other explicit
14 activation examples within the Seelig reference?

15 MS. RAW: Objection. Form.

16 A. Well, I think it's a question of what we mean
17 by activation. I'm going to go back and rotate this
18 again.

19 He doesn't -- he -- he is really
20 describing -- I think, the activation that he's
21 describing with the coin is one way in which the -- the
22 charging station, essentially, would be made ready to
23 then automatically detect the car and detect the signal
24 from the car so that it could begin to actually apply
25 charging power.

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1 I don't think he's talking here about
2 activation from -- or activation of the charging
3 process. So, this is really more letting the charging
4 station know that something is about to happen, and it
5 now needs to be waiting and listening for a signal from
6 the car.

7 Q. Okay. I'm going to move from that.

8 We talked a -- do you recall talking for a
9 while about amount of charge in the previous deposition?

10 A. Yes.

11 Q. And your -- you're aware that the term "amount
12 of charge" is in the claims of both the 987 and 788
13 patents, as well, correct?

14 A. I believe that's correct. Let me go look at
15 the claim.

16 So, yes, it shows up in 987, and I think
17 it's pretty much the same claim limitation. Yeah,
18 obviously different number, but, yeah, that term appears
19 in both claims.

20 Q. In your opinion, does that term "amount of
21 charge" have the same meaning across all three patents?

22 A. I would have to go and look at the three
23 patents just to be certain of that. I believe that the
24 answer to that is yes because they all have the same
25 specification. So, any description or discussion of the

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1 amount of charge in one is going to be the same as the
2 other.

3 MR. POMEROY: I have no further questions.
4 I pass the witness.

5 MS. RAW: Can we take a quick break?

6 MR. POMEROY: That's fine.

7 MS. RAW: All right. Let's go off the
8 record.

9 THE REPORTER: The time is 11:28 a.m.
10 Central Standard Time.

11 We're off the record.

12 (Short recess.)

13 THE REPORTER: The time is 11:34 a.m.
14 Central Standard Time.

15 We're back on the record.

16 MS. RAW: No further questions.

17 MR. POMEROY: Okay.

18 THE REPORTER: Okay. That concludes the
19 deposition.

20 THE WITNESS: That's the shortest
21 deposition I've had yet.

22 THE REPORTER: The time is 11:34 a.m.

23 We're off the record.
24
25

[illegible]

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SIGNATURE PAGE

I, SCOTT ANDREWS, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted on the correction page.

SCOTT ANDREWS

THE STATE OF TEXAS)
COUNTY OF _____)

Before me _____ on this day personally appeared _____ known to me [or proved to me on the oath of _____ or through _____ (description of identity card or other document)] to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he/she executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this _____ day of _____, 2025.

NOTARY PUBLIC IN AND FOR
THE STATE OF T E X A S

My Commission Expires:

Job No. TX7612675

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3 TESLA, INC,
4 Petitioner, v.

5 CHARGE FUSION TECHNOLOGIES, LLC,
6 Patent Owner.
7 Case IPR2025-00152
8 U.S. Patent 11,990,788

9 REPORTER'S CERTIFICATION
10 DEPOSITION OF SCOTT ANDREWS
11 TAKEN OCTOBER 1, 2025

12 I, MICHELLE MINOR, Certified Shorthand Reporter in
13 and for the State of Texas, hereby certify to the
14 following:

15 That the witness, SCOTT ANDREWS, was duly sworn by
16 the officer and that the transcript of the oral deposition
17 is a true record of the testimony given by the witness;

18 That the deposition transcript was submitted on
19 _____ to the witness or to the attorney for
20 the witness for examination, signature and return to
21 VERITEXT LEGAL SOLUTIONS, by _____;

22 That the amount of time used by each party at the
23 deposition is as follows:

24 Lydia Raw - 00:00

25 Michael Pomeroy - 00:28

I further certify that I am neither counsel for,
related to, nor employed by any of the parties in the
action in which this proceeding was taken, and further
that I am not financially or otherwise interested in the
outcome of the action.

Further certification requirements pursuant to Rule
203 of TRCP will be certified to after they have occurred.

Certified to by me this 3rd day of October, 2025.



MICHELLE MINOR, CSR, CSR NO. 9244;

Expiration Date: 12-31-27

VERITEXT LEGAL SOLUTIONS

Firm Registration No. 571

300 Throckmorton St., Ste. 1600

Ft. Worth, TX 76102

1 Lydia.raw@eriseip.com

2 October 3, 2025

3 RE: Tesla, Inc. v. Charge Fusion Technologies, LLC

4 DEPOSITION OF: Scott Andrews (# 7612675)

5 The above-referenced witness transcript is
6 available for read and sign.

7 Within the applicable timeframe, the witness
8 should read the testimony to verify its accuracy. If
9 there are any changes, the witness should note those
10 on the attached Errata Sheet.

11 The witness should sign and notarize the
12 attached Errata pages and return to Veritext at
13 errata-tx@veritext.com.

14 According to applicable rules or agreements, if
15 the witness fails to do so within the time allotted,
16 a certified copy of the transcript may be used as if
17 signed.

18 Yours,

19 Veritext Legal Solutions
20
21
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[00032 - arrangement]

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[go - mpomeroy]

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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.

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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.

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