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

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

ORAL DEPOSITION OF SCOTT ANDREWS
OCTOBER 1, 2025
VOLUME 1 OF 1

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

1 A P P E A R A N C E S
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FOR PETITIONER:
3 Ms. Lydia Raw
ERISE IP
4 7015 College Boulevard, 10th Floor
Overland Parks, Kansas 66211
5 Lydia.raw@eriseip.com
6
FOR PATENT OWNER:
7 Mr. Michael Pomeroy
COZEN O'CONNOR
8 1717 Main Street, Suite 3100.
Dallas, Texas 75201
9 Mpomeroy@cozen.com
10
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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.

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

A. Yes.

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

A. That's correct.

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

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

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

THE WITNESS: Oh, yes. Go ahead.

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

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

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

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

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

Q. Got it.

Anything else?

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

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

A. No.

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

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

specifications are the same.

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

MS. RAW: Objection.

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

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

Exhibit 1.

(Exhibit No. 1 marked for identification.)

A. All right. I have it open.

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

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

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

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

A. Sure.

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

Q. Yeah.

A. Okay.

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

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

Q. And what do you mean by colocated?

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

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

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

MS. RAW: Objection. Form.

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

Q. (BY MR. POMEROY) All right.

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

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

A. Okay.

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

A. I see that.

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

MS. RAW: Objection. Form.

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

What that means is that a signal is conveyed in some way from that processer to the parking space charging device.

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

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

MS. RAW: Objection. Form.

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

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

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

Q. Yes.

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

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

Q. Let me change question.

Is there any part of the claim that you are

exclusively relying upon Seelig for?

MS. RAW: Objection. Form.

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

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

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

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

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

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

MS. RAW: Objection. Form.

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

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

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

MS. RAW: Objection. Form.

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

Do you know what exhibit number that is?

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

A. No wonder I couldn't find it.

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

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

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

A. Sure. I'm there.

Q. If you go down to Line 51.

A. Okay.

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

A. I see that.

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

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

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

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

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

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

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

MS. RAW: Objection. Form.

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

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

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

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

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

A. Yes.

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

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

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

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

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

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

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

MS. RAW: Can we take a quick break?

MR. POMEROY: That's fine.

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

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

We're off the record.

(Short recess.)

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

We're back on the record.

MS. RAW: No further questions.

MR. POMEROY: Okay.

THE REPORTER: Okay. That concludes the deposition.

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

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

We're off the record.

CORRECTION PAGE

WITNESS NAME: SCOTT ANDREWS DATE: 10/01/2025

PAGE	LINE	CHANGE	REASON

Job No. TX7612675

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

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

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

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

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

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

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

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

Lydia Raw - 00:00
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

Lydia.raw@eriseip.com

October 3, 2025

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

DEPOSITION OF: Scott Andrews (# 7612675)

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

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

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

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

Yours,

Veritext Legal Solutions

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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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