

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

TESLA INC.,

Petitioner,

vs.

Case IPR2025-00152

U.S. Patent No. 11,990,788

CHARGE FUSION
TECHNOLOGIES LLC,

Patent Owner.

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

TESLA INC.,

Petitioner,

vs.

Case IPR2025-00153

U.S. Patent No. 11,631,987

CHARGE FUSION
TECHNOLOGIES LLC,

Patent Owner.

DEPOSITION OF DR. STEVEN GOLDBERG
Taken on behalf of the Petitioner

December 10, 2025

Saundra Tippins, CCR

(The deposition began at 10:00 a.m.)

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CHARGE FUSION
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Patent Owner.

DEPOSITION OF DR. STEVEN GOLDBERG,

produced, sworn, and examined on the 10th day of
December, 2025, between the hours of nine o'clock
in the forenoon and five o'clock in the afternoon
of that day, via Zoom, before SAUNDRA TIPPINS, a
Notary Public, and Certified Court Reporter within
and for the States of Missouri and Kansas, in a
certain cause now pending before the U.S. Patent
and Trademark Office, Before the Patent Trial and
Appeal Board, wherein TESLA INC. is Petitioner, and
CHARGE FUSION TECHNOLOGIES LLC is Patent Owner.

A P P E A R A N C E S (by Zoom)

For the Petitioner:

MS. LYDIA C. RAW
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For the Patent Owner:

MR. FREDERICK A. TECCE
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The Court Reporter:

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Lexitas Legal
1608 Locust Street
Kansas City, Missouri 64108

Also Present:

Mr. Ashraf Fawzy

1 IT IS HEREBY STIPULATED AND AGREED,
2 by and between counsel for parties that the
3 deposition of DR. STEVEN GOLDBERG may be taken in
4 shorthand by Sandra Tippins, a notary public and
5 shorthand reporter, and afterwards transcribed into
6 typewriting; and the signature of the witness is
7 expressly reserved.

8 * * * * *

9 THE REPORTER: Would you like an
10 electronic copy?

11 MR. TECCE: Yes.

12 * * * * *

13 MS. RAW: Let's do appearances for
14 the record. Lydia Raw from Erise IP representing
15 the Petitioner, Tesla Inc.

16 MR. TECCE: Fred Tecce for Patent
17 Owner, Charge Fusion Technologies LLC.

18 DR. STEVEN GOLDBERG,
19 of lawful age, produced, sworn and examined on
20 behalf of Petitioner, deposes and says:

21 EXAMINATION

22 QUESTIONS BY MS. RAW:

23 Q Good morning, Dr. Goldberg. Can you
24 please state your name and location for the
25 record.

1 A Steven Howard Goldberg, and I'm in
2 Cupertino, California, C-u-p-e-r-t-i-n-o.

3 Q All right. And I understand you've
4 been deposed many times before, so just a few
5 reminders as we begin today.

6 We do have a court reporter. She will be
7 taking down everything that we say today. But
8 because of that, it's very important that we be
9 careful not to talk over each other and to give
10 verbal answers like a yes or a no rather than a
11 nod or shake of the head. Is that fair?

12 A Yes, it is.

13 Q All right. If for any reason today
14 you can't understand a question I ask, please let
15 me know so that I can rephrase.

16 Can you do that for me?

17 A Yes, I can.

18 Q All right. And if I -- you do provide
19 an answer to a question, I'm going to assume that
20 you understood my question. Is that fair?

21 A Yes, it is.

22 Q Is there any reason you couldn't
23 provide complete and truthful testimony today?

24 A There is not.

25 Q Do you understand that today you are

1 here to discuss the declaration that you provided
2 in IPR numbers 2025-00152 and 2025-00153?

3 A I didn't remember them that way. I
4 remember them related to the '788 patent and the
5 '987 patent. If those match up, yes, I do.

6 Q Okay. And so you understand that you
7 provided a declaration relating to the '788
8 patent, which is Patent No. 11,990,788. Correct?

9 A Correct. I'm pretty sure. I don't
10 have the patent number memorized, but that sounds
11 right.

12 Q Okay. Sitting here today, are you
13 aware of any inaccuracies in the declaration
14 you've provided relating to the '788 patent?

15 A There may be some simple typos. The
16 last time I've been through it, I didn't see any
17 major issues. And I'll call those out if they
18 come up.

19 Q Do you have a clean copy of your
20 declaration relating to the '788 patent with you
21 today?

22 A I do.

23 MS. RAW: Okay. For the record,
24 we will designate that as Exhibit 1.

25 (Counsel electronically

1 designated a document as Exhibit No. 1.)

2 Q (By Ms. Raw) All right.

3 A Would you like me to open it?

4 Q Not yet.

5 A Okay, fine.

6 Q And I understand you also provided a
7 declaration relating to the '987 patent, which for
8 the record is U.S. Patent No. 11,631,987. Is that
9 correct?

10 A That sounds right, the '987 -- the
11 '987 patent, yes.

12 Q And sitting here today, are you aware
13 of any inaccuracies in your declaration relating
14 to the '987 patent?

15 A Same answer. I think if anything
16 there's probably just some typos or small
17 grammatical errors that I can bring up if it comes
18 up.

19 Q And do you have a clean copy of your
20 declaration relating to the '987 patent with you
21 today?

22 A I do.

23 MS. RAW: Okay. Just for the
24 record, we will mark that as Exhibit 2.

25 (Counsel electronically

1 designated a document as Exhibit No. 2.)

2 Q (By Ms. Raw) If at any point today
3 you want to refer to one of your declarations in
4 answering my question, that's fine. I'd just ask
5 that you tell me which page or paragraph number
6 you're referring to. Is that fair?

7 A Yes, it is.

8 Q Okay. And do you recall a couple of
9 months ago I took your deposition relating to the
10 '338 patent, which is U.S. Patent No. 11,563,338?

11 A I do.

12 Q Okay. Sitting here today, are you
13 aware of any inaccuracies in the testimony that
14 you provided relating to the '338 patent?

15 A Not that I'm aware of, no.

16 Q Okay. Are you aware that the '338
17 patent shares the same specification as the '788
18 and '987 patents?

19 A I am.

20 Q So if I asked you the same questions
21 about the specification that you were previously
22 asked relating to the '338 specification, is it
23 true that those same answers would apply then with
24 respect to the specifications for the '788 and
25 '987 patents?

1 MR. TECCE: Object to form.

2 A Yeah. I think I understand your
3 question. I mean, I haven't reviewed -- just to
4 be open, I have not reviewed the deposition
5 transcript, and I'm speaking under oath and being
6 as honest as I can.

7 I'll answer the questions as I see it.
8 I'm not sure word by word everything will match
9 up if you ask me the exact same question. But in
10 a deposition, I absolutely understand I answer as
11 honestly as I can.

12 Q Okay. In your opinion, does the term
13 "amount of charge" have the same meaning across
14 all three patents; that, is the '338, the '788 and
15 the '987 patent?

16 A Yeah. Basically there are three
17 different declarations. I understand they all
18 relate to the same -- to the same -- the same
19 specification. They're all tied together. And my
20 sense is they should all mean the same thing.

21 We could go to each of the declarations
22 and I could share my opinions that I wrote in
23 those -- in those declarations.

24 Q You understand that the '788 patent
25 and the '987 patent both have claims that require

1 a unitary vehicle charge indicator?

2 A If you'd like to show me that, I could
3 take a look.

4 Q Okay. Can you please open your
5 declaration for, let's do the '788 patent.

6 A (Witness complies.) I have it open
7 now.

8 Q Okay. Okay, can you go to page 19.

9 A Yes. That's the section on unitary
10 vehicle charge indicator.

11 Q Correct.

12 A Yes.

13 Q Okay. Do you understand the '788
14 patent has claims that require unitary vehicle
15 charge indicator?

16 A I'm just -- would you mind if I opened
17 the '788 patent up?

18 Q Yes.

19 MS. RAW: For the record, we can
20 mark U.S. Patent No. 11,990,788 as Exhibit 3.

21 (Counsel electronically
22 designated a document as Exhibit No. 3.)

23 Q (By Ms. Raw) Can you just confirm
24 that the copy you're opening is a clean copy with
25 no annotations?

1 A It is a clean copy with no
2 annotations. I'm not sure what limitation I
3 called it, but in Claim 1 of the '788 patent there
4 is language, And adapted to display a unitary
5 vehicle charge indicator, yes. So the '788 does
6 use that language.

7 Q Okay. Do you also have a clean copy
8 of the '987 patent?

9 A I do.

10 Q Can you please open that patent just
11 to confirm that that patent also includes the
12 language 'unitary vehicle charge indicator'?

13 MS. RAW: For the record, we'll
14 mark the U.S. Patent No. 11,631,987 as Exhibit 4.

15 (Counsel electronically
16 designated a document as Exhibit No. 4.)

17 A Yes. And in one of the later
18 limitations of Claim 1 of the '987 opinion, there
19 is the language "unitary vehicle charge
20 indicator."

21 Q What is a unitary vehicle charge
22 indicator in the context of the '788 and '987
23 patents?

24 A It can -- I'm gonna go back to my '788
25 declaration. So basically I'm just going to say

1 one thing first.

2 I don't recall a claim construction
3 requirement that I provided, and so I talk about
4 it. And as a matter of fact, paragraph -- on
5 page 19 that you just called out a moment ago
6 starting at paragraph 39 and going through
7 paragraph 42, I basically rebut Mr. -- I think
8 it's Mr. Andrews' and Petitioner's proposed
9 construction.

10 And so that's where I focus on this
11 section. I'd be happy to read through this. I'm
12 not sure if I gave my own definition. I
13 definitely talk a lot about what I believe it
14 means in the context of how it's constructed.
15 Let's see.

16 I restate the claims, for example, in
17 paragraph 41. Each of the challenged claims
18 require a unitary vehicle charge indicator, and
19 then it talks about from the claim, comprising a
20 combination of input and output GUI, G-U-I,
21 elements, the GUI elements comprising.

22 And then I can continue to read from my
23 report, but I'll just stop there.

24 Q So in the paragraph 41 that you're
25 referring to, just after you stopped reading, it

1 discusses the unitary vehicle charge indicator,
2 including a first portion indicative of the amount
3 of charge residing in the battery of the electric
4 vehicle; a second portion indicative of an
5 uncharged capacity in the battery of the electric
6 vehicle; and a third portion comprising a slider
7 by which an amount of charge may be specified.

8 Correct?

9 A You did read that correctly.

10 Q Okay. Would you agree that a bar
11 graph comprising a charged portion and uncharged
12 portion and a slider portion as illustrated in
13 Figure 7 of the specification in these patents is
14 one example of a unitary vehicle charge indicator?

15 A No, I wouldn't.

16 Q Okay. Why not?

17 A Basically again when -- I do talk
18 about the term "bar graph," and obviously it does
19 come up in some of the prior art.

20 I understand the question you asked. I
21 just want to clarify. I thought what you asked
22 me was, was a unitary vehicle charge indicator a
23 bar graph? And that may not have been exactly
24 what you asked me.

25 And can -- can a -- so can a unitary

1 vehicle charge indicator be represented by
2 something other than a bar graph? And in the
3 first sentence of paragraph 39, I basically do
4 make a statement related to the question that you
5 just asked.

6 And I just want to be really crystal
7 clear. A bar graph is a bar graph, and the
8 unitary vehicle charge indicator is a disputed --
9 I don't know if that's a good word to use -- it's
10 a term used in this matter. And I do talk a lot
11 about it.

12 The fact is that the '788 patent
13 explicitly states, and I'm just reading from my
14 report, Other configurations of systems and
15 devices may also or alternatively be utilized to
16 perform the methods described herein without
17 deviating from the scope of some of the
18 embodiments.

19 And so basically in the last sentence of
20 paragraph 39 I state, It is my opinion that a
21 POSITA would recognize that the unitary vehicle
22 charge indicator is not limited to a bar graph
23 representation.

24 Q Does Figure 7 show one example of a
25 unitary vehicle charge indicator, in your view?

1 A Yeah. In paragraph 40 of my report, I
2 was relating to -- I was responding to and
3 rebutting the fact why Mr. Andrews and Petitioner
4 didn't provide any reasoning or argument why the
5 board should construe unitary vehicle charge
6 indicator to be limited to a bar graph, aside from
7 the fact, which I'm stating, that an illustrative
8 bar graph is included within Figure 7.

9 So if that's a response to your question,
10 there is an illustrative bar graph included
11 within Figure 7 that's tied to the unitary
12 vehicle charge indicator.

13 Q In your view, does the slider have to
14 be positioned over the claimed first and second
15 portions of the charge indicator in order for it
16 to be a unitary vehicle charge indicator?

17 A So when you say -- when you say -- oh,
18 did I just lose you?

19 Q No.

20 A Someone just came on. I see.

21 When you said over, it's -- first of all,
22 I talk about the slider as being a third portion
23 of the -- it's tied -- it's tied to the
24 definition -- I call it definition, but the
25 requirement in the patent claims.

1 So I'm not sure if I'm comfortable saying
2 "on." It's a portion of.

3 Q In your view, where does the slider
4 have to be positioned in order to be part of the
5 vehicle charge indicator?

6 A Okay, I don't think I provided an
7 opinion related to where it needed to be. Again,
8 I was responding to Petitioner and Mr. Andrews
9 when I provided my opinions.

10 If you'd like to point me to something in
11 my report that maybe talked about the location.
12 But I do talk about them being a unitary I'll
13 call it an element. And I do talk about that in
14 my report, that there's a first portion, a second
15 portion and a third portion of this element, this
16 unitary element, and I talk about the term
17 "unitary."

18 Q What is the function of the first
19 portion of the unitary vehicle charge indicator?

20 A Well, again, I do talk about the first
21 portion as the claim defines it is indicative of
22 an amount of charge residing in a battery of the
23 electric vehicle, if that's what you asked. I'm
24 not sure.

25 Q But what's the -- what's the function

1 of showing the amount of charge residing in the
2 battery?

3 A I do understand your question. I'm
4 just not sure if in my report I provided a
5 response related to the function of it. I can
6 rereview my report. Maybe I could do an
7 electronic search.

8 But off the top of my head, I'm not sure
9 if there's a single one-sentence simple answer.
10 And I'm not sure I provided one.

11 Q Do you recall providing any opinions
12 about the function of the second portion of the
13 unitary vehicle charge indicator?

14 A Again, I just don't recall if I
15 provided an answer related to the function of it.
16 I talked about what it comprised and potentially
17 what it represents, but I'm not sure I answered to
18 the function.

19 I may have. Here, let's see. Okay, I was
20 just looking.

21 Yes, it's that same paragraph 41. I do
22 reference the term in the last sentence of
23 paragraph 41, Thus it is my opinion that a POSITA
24 would recognize that the unitary vehicle charge
25 indicator includes three portions that interact

1 with each other, and that each portion of the
2 indicator provides functionality.

3 I didn't say what that functionality was
4 in that sentence, so ...

5 Q In your view, does -- is the third
6 portion, the slider element, required to interact
7 with the first and second portions?

8 A Well, I just said that. I'll just
9 repeat the same answer.

10 The last sentence of paragraph 41, I said
11 that the unitary vehicle charge indicator
12 includes three portions that interact with each
13 other.

14 Q Okay. So what's your view of the
15 relationship, the claimed relationship, between
16 the slider and the first portion of the unitary
17 vehicle charge indicator, if any?

18 A Again, I understand your question.
19 I'm just not sure.

20 Again, my responses in my report were in
21 rebuttal and in response to Mr. Andrews and to
22 Petitioner.

23 If you'd like to point me to somewhere in
24 my report, you want to ask me to explain what
25 I've said, but I just don't recall specifically

1 answering that question. I'm not sure if that
2 was necessary in my opinions.

3 Q Can you look at paragraph 42 of your
4 report on the '788 patent.

5 A I'm right there, yes.

6 Q Okay. Do you see that in the first
7 sentence of paragraph 42 you say, As claimed, it
8 is clear the first and second portion do not
9 merely inform people of information, but instead
10 define the scope of the charge indicator and the
11 amount of charge that may be logically selected by
12 the user via the slider, as the user will not
13 select an amount of charge that is less than the
14 current state of charge?

15 Do you see that?

16 A I do.

17 Q Do the claims say that the user can't
18 use a slider to select an amount of charge less
19 than the current amount of charge?

20 A I understood your question. Just one
21 second, please.

22 Yeah, I just -- I just -- you asked me if
23 the claims say certain language. I'd be glad to
24 go to the claims, and if you want me to make a
25 statement that certain language isn't in the

1 claims, I'd be happy to do that.

2 Q Yeah. You're welcome to review the
3 claim of the '788 patent as well.

4 Essentially my question is, what's the
5 basis for your statement that the user will not
6 select an amount of charge that is less than the
7 current state of charge?

8 A I was just trying to give perspective
9 to how the unitary charge -- the unitary vehicle
10 charge indicator might be used. That's all. I
11 wouldn't read too much into it.

12 Q Can a user select an amount of charge
13 less than the current state of charge?

14 A I can go back and look at the patent
15 and see if it talks about that. But, I mean,
16 you're asking a question that -- are you saying
17 would the user want to discharge the battery? Is
18 that what you're asking me?

19 Q I'm just wondering whether there is
20 any scenario where a user would want to set an
21 amount of charge less than the current state of
22 charge.

23 A Well, again, I'm just rebutting
24 Mr. Andrews and Petitioner. And I can go back
25 and -- in this section I provided some background

1 as to how it might be used. This is not a section
2 where I'm responding to grounds that are listed in
3 the -- in Mr. Andrews' declaration or in the
4 petition.

5 Yeah, I don't -- I don't think I have an
6 opinion here for you.

7 Q Okay. Is there any citation you could
8 point me to in the specification or claims that
9 would support the statement that the user will not
10 select an amount of charge less than the current
11 state of charge?

12 A As I said, I'd be happy to go back and
13 read the specification again. It would probably
14 take a while. But off the top of my head, I don't
15 have a citation, unless you want to point one out
16 to me.

17 Q Okay. Do you recall that in the '338
18 patent, the claims required a vehicle charge
19 indicator element?

20 A I don't have them memorized.

21 Q Okay. Do you have a clean copy of the
22 '338 patent with you today?

23 A I do. I do.

24 Q Okay.

25 A And it's open.

1 Q Okay. Can you go to Claim 1 of the
2 '338 patent, please, to confirm that it also
3 requires a vehicle charge indicator element.

4 A I see that in the longest limitation
5 in Claim 1 of the '338 patent. I do see the
6 language "vehicle charge indicator element."

7 Q In your view, is there any difference
8 between a vehicle charge indicator element and a
9 unitary vehicle charge indicator element?

10 (Off the record.)

11 Q (By Ms. Raw) Dr. Goldberg, in your
12 view is there a difference between the vehicle
13 charge indicator element claimed in the '338
14 patent and the unitary vehicle charge indicator
15 claimed in the '788 and '987 patents?

16 A Yeah. So it's basically the same
17 specification, right?

18 And oh, by the way, I'm not sure if I'll
19 need to correct my testimony, but just not this
20 question, but the last question you asked me what
21 language was present in the '338. And I
22 wasn't -- I think I may have heard unitary. And
23 when I think we both agree that in the '338, it
24 doesn't say unitary. It says -- on the '338
25 claim, one, it says vehicle charge indicator

1 element.

2 Q Right. Thank you for that.

3 A Was that your question?

4 Q Thank you for that clarification. Let
5 me re-ask my question so we have a clear record.

6 My question is, what, if anything, is the
7 difference between the vehicle charge indicator
8 claimed in the '338 patent and the unitary
9 vehicle charge indicator claimed in the '788 and
10 '987 patents?

11 A Yeah. Basically my sense is that it's
12 the same specification. And we're referring to
13 Figure 7, which has the same display. And in
14 my -- I don't have my '338 declaration in front of
15 me. I can open that if you want. I think I still
16 have it.

17 But I came today to talk about the '788
18 and not about the '338. But in the '788, I do
19 reference quite a bit Figure 7 and what the
20 indication is and how it's used. And I even have
21 a cite regarding -- I can't remember if it's in
22 the '987 or '788 or both relating to how GUIs are
23 perceived.

24 So I could go into all of those things. I
25 understand your question. I came to talk about

1 the '788 and '987, and I have opinions for those
2 two today. If you want me to try to rationalize
3 differences between these and the '388, I'd have
4 to go back and look at the '388.

5 Q Okay. Is it fair to say --

6 A Or '338.

7 Q So is it fair to say you haven't
8 considered the question of whether a vehicle
9 charge indicator is different than a unitary
10 vehicle charge indicator?

11 A No. I just want to be accurate, and I
12 just want to make sure that I consider everything
13 I considered in the '338. That's all I'm saying.
14 That's all I'm saying.

15 Q Okay. Then do you have an answer to
16 the question of whether there's a difference
17 between the unitary vehicle charge indicator and a
18 vehicle charge indicator?

19 A I'll just repeat my question. You're
20 asking me about something about the '338. I
21 can't -- I came prepared today to talk about the
22 '788 and the '987. If you'd like me now to go
23 back to my '338 declaration, then I can try to
24 resolve your answer for you.

25 Q Okay. So without going back and

1 rereading your '338 declaration, you don't have an
2 answer to my question. Is that fair?

3 A I just don't feel comfortable
4 answering it until I rationalize what exactly --
5 the three separate declarations. And you're
6 asking me by memory to look at something I talked
7 about months ago. I'm just not prepared to
8 provide an answer that I feel is complete.

9 Q Okay. Can you please go back to
10 paragraph 42 of the '788 declaration you provided.

11 A Yeah, I'm there.

12 Q Can you look at the last sentence of
13 paragraph 42. It says, Further, the first and
14 second portion operate as dynamic outputs of
15 information that constantly change based on the
16 amount of charge within the battery of the
17 electric vehicle, while the third portion
18 interacts to allow the input of dynamic data that
19 allows a user to select a desired amount of
20 charge.

21 Do you see that?

22 A I do.

23 Q Here are you stating that the slider
24 must allow the user to interact with the first and
25 second portions of the unitary vehicle charge

1 indicator? Is that a fair reading?

2 A Well, I did in another -- I think in
3 one of my previous answers, I talked about them
4 interacting with each other. I'm trying to -- let
5 me see where that was. Yeah, which -- you just
6 asked me about paragraph 42.

7 I'm just going back to the last sentence
8 of paragraph 41, where I did make a statement
9 that the three portions interact with each other.
10 And now you're asking me to parse the last
11 question of paragraph 42.

12 And I'll just -- I can have you ask the
13 question again, but it says what it says. I
14 mean, feel free to ask the question again. I'll
15 try to answer it.

16 Q Let me rephrase. And please feel free
17 to refer to the claim language of the '788 patent
18 if useful.

19 So my question is, do the claims require
20 the slider, which is the third portion, to
21 interact with the first and second portions?

22 A So you're asking me about the last
23 sentence of 42, but you really are asking about
24 the claims. You rephrased asking about the claims
25 of the '788?

1 Q That is correct. I am asking about
2 the claims of the '788.

3 A Okay. Yeah, so again, my report is in
4 rebuttal to Mr. Andrews and the Petitioner. And
5 so the opinions that I've got in this report
6 directly relate to what I read in Mr. Andrews'
7 declaration and the petition.

8 You're asking me additional questions I
9 may or may have opinions about. And so you're
10 asking me now to parse what's in the claims. And
11 I would just go back to sort of my general
12 approach to determining my opinions.

13 I read the claims. I go back to the
14 specification. I try to understand what a person
15 of ordinary skill in the art would understand the
16 claims to be by reading the specification.

17 If there's a particular spot in my
18 declaration that you'd like me to go to, fine.
19 But I -- if I don't have a specific opinion about
20 that, it's because it wasn't required in terms of
21 what I was asked to do in this declaration.

22 Q Okay. Let's look at the last sentence
23 of paragraph 41 that you pointed to a moment ago.

24 A Okay.

25 Q The last sentence of paragraph 41, I

1 understand that you're saying that the slider
2 portion interacts with the first and second
3 portions of the vehicle charge indicator.

4 Is that correct? Is that your opinion?

5 A If you're reading the last sentence as
6 the unitary vehicle charge indicator includes
7 three portions that interact with each other,
8 that's exactly what I said.

9 Q Okay. What's your basis for your
10 opinion that the slider interacts with the first
11 and second portions of the unitary vehicle charge
12 indicator?

13 A I understand the question. I'm gonna
14 go back to the '788 patent. It may take me a
15 while just to work through.

16 Yeah, I understand your question, and I
17 think I didn't construe "interact." I don't
18 think I did.

19 They're written together in the
20 specification, Claim 1, for example. I won't
21 read the whole thing, but it talks about the GUI
22 forming a part of the vehicle, adapted to
23 display. The indicator talks about what it's
24 comprised of.

25 Clearly the first and second parts

1 interact with each other as it charges. There's
2 an uncharged and charged amount. And a slider,
3 which basically relating to how much charge there
4 is and how much charge may be specified are all
5 together in this unitary element.

6 I'd have to go back and read my report
7 again to try to figure out if there was something
8 more specific I meant by the word "interact."
9 But I think I used it generally.

10 There is an integrated, unitary, all in
11 one, all in one location, a three-component
12 element.

13 Q Okay. No further questions.

14 MS. RAW: Fred, are you there?

15 MR. TECCE: Did you ask me a
16 question?

17 MS. RAW: I said no further
18 questions.

19 THE REPORTER: Do you want to read
20 and sign?

21 MR. TECCE: Steve, what do you
22 want to do? My position is sign before any
23 notary.

24 (The witness was excused, and
25 the deposition ended at 10:48 a.m.)

CERTIFICATE OF REPORTER

I, Sandra Tippins, Certified Court Reporter
(Missouri) and Certified Shorthand Reporter
(Kansas), do hereby certify that the witness whose
testimony appears in the foregoing deposition was
duly sworn by me pursuant to Section 492.010 RSMo;
that the testimony of said witness was taken by me
to the best of my ability and thereafter reduced to
typewriting under my direction; that I am neither
counsel for, related to, nor employed by any of the
parties to the action in which this deposition was
taken, and further that I am not a relative or
employee of any attorney or counsel employed by the
parties thereto, nor financially or otherwise
interested in the outcome of the action.



Certified Court Reporter
State of Missouri No. 254

Certified Shorthand Reporter
State of Kansas No. 1613

1 I, DR. STEVEN GOLDBERG, do hereby certify:

2 That I have read the foregoing deposition;

3 That I have made such changes in form
4 and/or substance to the within deposition as
5 might be necessary to render the same true and
6 correct;

7 That having made such changes thereon, I
8 hereby subscribe my name to the deposition.

9 I declare under penalty of perjury that
10 the foregoing is true and correct.

11
12 Executed the _____ day of _____,
13 20____, at

14 _____.

15
16 _____.

17
18
19 My Commission Expires:

20 _____

21 Notary Public:

22 _____

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Errata Sheet

Witness: DR. STEVEN GOLDBERG

In Re: TESLA INC. v. CHARGE FUSION TECHNOLOGIES

Upon reading the deposition and before subscribing thereto, the deponent indicated the following changes should be made:

Page	Line	Should read:
Reason assigned for change :		

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Page	Line	Should read:
Reason assigned for change :		

Reporter: Sandra Tippins

Lexitas Legal
1608 Locust Street
Kansas City, Missouri 64108

Phone (816) 221-1160 * Fax (816)221-1160

December 10, 2025

MR. FREDERICK A. TECCE
ALTIMA ADVISORS ATTORNEYS
One Liberty Place, 55th Floor
Philadelphia, Pennsylvania 19103

In Re: Tesla vs. Charge Fusion Technologies

Dear Mr. Tecce:

Please find enclosed a copy of the deposition
of DR. STEVEN GOLDBERG, taken December 10, 2025,
in the above-referenced case. Also enclosed is
the original signature page and errata sheets.

Please have the witness read this copy of the
transcript, indicate any changes and/or
corrections desired on the errata sheets, and sign
the signature page before a notary public.

Please return the errata sheets and notarized
signature page to Production Department, 1608
Locust Street, Kansas City, Missouri, 64108,
for filing within 30 days of receipt of this
letter.

Thank you for your attention to this matter.

Sincerely,

Sandra Tippins

CC: Ms. Lydia C. Raw

1	20	A	ago 9:9 13:5 26:7 28:23	25:15,24 26:2,8 27:15
1 7:24 8:1 12:3,18 23:1, 5 29:20	4	a.m. 30:25	agree 14:10 23:23	answered 18:17
10:48 30:25	4 12:14,16	ability 31:8	AGREED 5:1	answering 9:4 20:1 26:4
11,563,338 9:10	40 16:1	about 9:21 13:3,13,19 14:18 15:11 16:22 17:11, 12,13,16,20 18:12,16 21:15 24:17, 18,25 25:20, 21 26:7 27:3, 6,22,23,24 28:1,9,19 29:21,23	all 6:3,13,18 8:2 10:14,17, 19,20 16:21 21:10 24:24 25:13,14 30:4,10,11	answers 6:10 9:23 27:3
11,631,987 8:8 12:14	41 13:17,24 18:21,23 19:10 27:8 28:23,25	absolutely 10:10	allow 26:18, 24	any 6:13,22 7:13,16 8:13 9:2,13 16:4 18:11 19:17 21:20 22:7 23:7 30:22 31:10,13
11,990,788 7:8 11:20	42 13:7 20:3,7 26:10,13 27:6,11,23	accurate 25:11	allows 26:19	anything 8:15 24:6
1613 31:23	492.010 31:6	across 10:13	also 8:6 12:7, 11 15:15 23:2	appearances 5:13
19 11:8 13:5	7	action 31:11, 15	alternatively 15:15	appears 31:5
2	7 14:13 15:24 16:8,11 24:13,19	adapted 12:4 29:22	amount 10:13 14:2,7 17:22 18:1 20:11, 13,18,19 21:6,12,21 22:10 26:16, 19 30:2	apply 9:23
2 8:24 9:1	788 7:4,7,14, 20 9:17,24 10:14,24 11:5,13,17 12:3,5,22,24 15:12 20:4 21:3 23:15 24:9,17,18,22 25:1,22 26:10 27:17,25 28:2 29:14	additional 28:8	and/or 32:4	approach 28:12
20 32:13		after 13:25	Andrews 16:3 17:8 19:21 21:24 28:4	argument 16:4
2025-00152 7:2		afterwards 5:5	Andrews' 13:8 22:3 28:6	art 14:19 28:15
2025-00153 7:2		again 14:17 17:7,20 18:14 19:18,20 21:23 22:13 27:13,14 28:3 30:7	annotations 11:25 12:2	as 6:5 7:24 8:1,24 9:1,17 10:6,7,10,11 11:20,22 12:14,16 13:4 14:12 16:22 17:21 20:7,12 21:3 22:1,12 26:14 29:5 30:1 32:4
254 31:21	9	age 5:19	another 27:2	aside 16:6
3	987 7:5 8:7, 10,11,14,20 9:18,25 10:15,25 12:8,18,22 23:15 24:10, 22 25:1,22		answer 6:19 8:15 10:7,10 18:9,15 19:9	
3 11:20,22				
338 9:10,14, 16,22 10:14 22:17,22 23:2,5,13,21, 23,24 24:8, 14,18 25:6, 13,20,23 26:1				
388 25:3,4				
39 13:6 15:3,				

ask 6:14 9:4 10:9 19:24 27:12,14 30:15 asked 9:20,22 14:20,21,24 15:5 17:23 20:22 23:20 27:6 28:21 asking 21:16, 18 25:20 26:6 27:10,22,23, 24 28:1,8,10 assigned 33:6,8,9,11, 12,14,15,17, 18,20,21 assume 6:19 at 9:2 13:6 20:3 21:14 25:4 26:6,12 28:22 30:25 32:13 attorney 31:13 aware 7:13 8:12 9:13,15, 16 B back 12:24 21:14,24 22:12 25:4, 23,25 26:9 27:7 28:11,13 29:14 30:6 background 21:25 bar 14:10,18,	23 15:2,7,22 16:6,8,10 based 26:15 basically 10:16 12:25 13:7 14:17 15:3,19 23:16 24:11 30:3 basis 21:5 29:9 battery 14:3,5 17:22 18:2 21:17 26:16 because 6:8 28:20 before 6:4 30:22 33:4 begin 6:5 behalf 5:20 believe 13:13 best 31:8 between 5:2 19:15 23:8,12 24:7 25:3,17 bit 24:19 board 16:5 both 10:25 23:23 24:22 bring 8:17 but 6:7 7:10 10:9 12:3 13:23 16:24 17:12,25 18:8,17 19:25 20:9 21:15 22:14 23:19, 20 24:17,18	27:13,23 28:19 29:21 30:9 by 5:2,4,22 8:2 9:2 10:8 11:23 14:7 15:1 20:11 23:11,18 26:6 28:16 30:8 31:6,7,10,13 C C-U-P-E-R-T-I- N-O 6:2 California 6:2 call 7:17 16:24 17:13 called 12:3 13:5 came 16:20 24:17,25 25:21 capacity 14:5 careful 6:9 certain 20:23, 25 CERTIFICATE 31:1 Certified 31:2, 3,21,22 certify 31:4 32:1 challenged 13:17 change 26:15 33:6,8,9,11, 12,14,15,17,	18,20,21 changes 32:3, 7 33:5 charge 5:17 10:13 11:1, 10,15 12:5, 12,19,21 13:18 14:1,3, 7,14,22 15:1, 8,22,25 16:5, 12,15,16 17:5,19,22 18:1,13,24 19:11,17 20:10,11,13, 14,18,19 21:6,7,9,10, 12,13,21,22 22:10,11,18 23:3,6,8,9,13, 14,25 24:7,9 25:9,10,17,18 26:16,20,25 29:3,6,11 30:3,4 33:3 charged 14:11 30:2 charges 30:1 citation 22:7, 15 cite 24:21 claim 12:3,18 13:2,19 17:21 21:3 23:1,5, 25 27:17 29:20 claimed 16:14 19:15 20:7 23:13,15 24:8,9	claims 10:25 11:14 13:16, 17 16:25 20:17,23,24 21:1 22:8,18 27:19,24 28:2,10,13,16 clarification 24:4 clarify 14:21 clean 7:19 8:19 11:24 12:1,7 22:21 clear 15:7 20:8 24:5 Clearly 29:25 combination 13:20 come 7:18 14:19 comes 8:17 comfortable 17:1 26:3 Commission 32:19 complete 6:23 26:8 complies 11:6 comprised 18:16 29:24 comprising 13:19,21 14:6,11 configuration s 15:14 confirm 11:23 12:11 23:2
---	--	---	--	--

consider 25:12	crystal 15:6	designate 7:24	dynamic 26:14,18	25:12
considered 25:8,13	Cupertino 6:2	designated 8:1 9:1 11:22 12:16	E	exact 10:9
constantly 26:15	current 20:14, 19 21:7,13,21 22:10	desired 26:19	each 6:9 10:21 13:17 19:1,12 27:4, 9 29:7 30:1	exactly 14:23 26:4 29:8
constructed 13:14	D	determining 28:12	electric 14:3,5 17:23 26:17	EXAMINATIO N 5:21
construction 13:2,9	data 26:18	deviating 15:17	electronic 5:10 18:7	examined 5:19
construe 16:5 29:17	day 32:12	devices 15:15	electronically 7:25 8:25 11:21 12:15	example 13:16 14:14 15:24 29:20
context 12:22 13:14	declaration 7:1,7,13,20 8:7,13,20 11:5 12:25 22:3 24:14 25:23 26:1,10 28:7,18,21	difference 23:7,12 24:7 25:16	element 17:13,15,16 19:6 22:19 23:3,6,8,9,13 24:1 30:5,12	excused 30:24
continue 13:22	declarations 9:3 10:17,21, 23 26:5	differences 25:3	embodiments 15:18	Executed 32:12
copy 5:10 7:19 8:19 11:24 12:1,7 22:21	declare 32:9	different 10:17 25:9	elements 13:21	Exhibit 7:24 8:1,24 9:1 11:20,22 12:14,16
correct 7:8,9 8:9 11:11 14:8 23:19 28:1 29:4 32:6,10	define 20:10	direction 31:9	employed 31:10,13	Expires 32:19
correctly 14:9	defines 17:21	directly 28:6	employee 31:13	explain 19:24
could 10:21, 22 11:2 18:6 22:7 24:24	definitely 13:13	discharge 21:17	ended 30:25	explicitly 15:13
couldn't 6:22	definition 13:12 16:24	discuss 7:1	Erise 5:14	expressly 5:7
counsel 5:2 7:25 8:25 11:21 12:15 31:10,13	deponent 33:4	discusses 14:1	errors 8:17	F
couple 9:8	deposed 6:4	display 12:4 24:13 29:23	Essentially 21:4	fact 13:4 15:12 16:3,7
court 6:6 31:2,21	deposes 5:20	disputed 15:8	even 24:20	fair 6:11,20 9:6 25:5,7 26:2 27:1
	deposition 5:3 9:9 10:4, 10 30:25 31:5,11 32:2, 4,8 33:4	document 8:1 9:1 11:22 12:16	everything 6:7 10:8	feel 26:3,8 27:14,16
	described 15:16	down 6:7		few 6:4
		Dr 5:3,18,23 23:11 32:1 33:2		figure 14:13 15:24 16:8,11
		duly 31:6		

24:13,19 30:7 financially 31:14 fine 8:5 9:4 28:18 first 13:1 14:2 15:3 16:14,21 17:14,18,20 19:7,16 20:6, 8 26:13,24 27:21 29:2, 10,25 focus 13:10 following 33:4 for 5:2,13,16, 24 6:13,16 7:23 8:7,23 9:24 11:5,19 12:13 13:16 16:15 21:5 22:6 24:2,4 25:1,24 29:9, 20 31:10 33:6,8,9,11, 12,14,15,17, 18,20,21 foregoing 31:5 32:2,10 form 10:1 32:3 forming 29:22 Fred 5:16 30:14 free 27:14,16 from 5:14 13:19,22 15:13,17 16:6	front 24:14 function 17:18,25 18:5,12,15,18 functionality 19:2,3 further 26:13 30:13,17 31:12 Fusion 5:17 33:3 G G-U-I 13:20 gave 13:12 general 28:11 generally 30:9 give 6:9 21:8 glad 20:23 go 10:21 11:8 12:24 20:24 21:14,24 22:12 23:1 24:24 25:4,22 26:9 28:11, 13,18 29:14 30:6 going 6:19 12:25 13:6 25:25 27:7 Goldberg 5:3, 18,23 6:1 23:11 32:1 33:2 gonna 12:24 29:13	good 5:23 15:9 got 28:5 grammatical 8:17 graph 14:11, 18,23 15:2,7, 22 16:6,8,10 grounds 22:2 GUI 13:20,21 29:21 GUIS 24:22 H happy 13:11 21:1 22:12 having 32:7 head 6:11 18:8 22:14 heard 23:22 here 7:1,12 8:12 9:12 18:19 22:6 26:23 hereby 5:1 31:4 32:1,8 herein 15:16 honest 10:6 honestly 10:11 how 13:14 21:9 22:1 24:20,22 30:3,4 Howard 6:1	I if 6:13,18 7:5, 17 8:15,17 9:2,20 10:9 11:2,16 13:12 15:9 16:9 17:1,10,23 18:4,9,14 19:17,23 20:1,22,24 21:15 23:18 24:6,15,21 25:2,22 27:18 28:17,19 29:5 30:7 illustrated 14:12 illustrative 16:7,10 important 6:8 in 5:3 6:1 7:2, 13 8:13 9:3, 13 10:9,12, 22,23 12:3, 17,22 13:14, 16,24 14:3,5, 12,13,19 15:2,10,19,25 16:1,13,15,25 17:3,4,10,13, 22 18:1,4,22 19:4,5,20,21, 23 20:2,6,25 21:25 22:2,3, 8,17 23:4,5,7, 11,13,15,21, 23 24:8,9,13, 14,18,21 25:13 27:2 28:3,5,6,10, 15,17,20,21	29:19 30:5, 10,11 31:5, 11,15 32:3 33:3 inaccuracies 7:13 8:13 9:13 Inc 5:15 33:3 included 16:8,10 includes 12:11 18:25 19:12 29:6 including 14:2 indicated 33:4 indication 24:20 indicative 14:2,4 17:21 indicator 11:1,10,15 12:5,12,20,22 13:18 14:1, 14,22 15:1,8, 22,25 16:6, 12,15,16 17:5,19 18:13,25 19:2,11,17 20:10 21:10 22:19 23:3,6, 8,9,13,14,25 24:7,9 25:9, 10,17,18 27:1 29:3,6,12,23 inform 20:9 information 20:9 26:15
--	---	---	---	---

input 13:20 26:18	it's 6:8 13:8, 14 15:9 16:21,23 17:2 18:21 22:25 23:16 24:11, 20,21 28:20 29:23	26:12 27:7, 10,22 28:22, 25 29:5	lose 16:18	means 13:14
instead 20:9		later 12:17	lot 13:13 15:10	meant 30:8
integrated 30:10		lawful 5:19	Lydia 5:14	memorized 7:10 22:20
interact 18:25 19:6,12 26:24 27:9,21 29:7, 17 30:1,8	J	less 20:13,18 21:6,13,21 22:10	M	memory 26:6
interacting 27:4	just 6:4 8:16, 23 9:4 10:3 11:16,23 12:10,25 13:5,23,25 14:21 15:5,6, 13 16:18,20 18:4,14,20 19:8,19,25 20:20,22 21:8,19,23 23:19 25:11, 12,19 26:3,7 27:5,7,12 28:11 29:15	let 6:14 24:4 27:4,16	made 32:3,7 33:5	merely 20:9
interacts 26:18 29:2,10		let's 5:13 11:5 13:15 18:19 28:22	major 7:17	methods 15:16
interested 31:15		like 5:9 6:10 8:3 11:2 17:10 19:23 25:22 28:18	make 15:4 20:24 25:12 27:8	mind 11:16
into 5:5 21:11 24:24		limitation 12:2 23:4	many 6:4	Missouri 31:3,21
IP 5:14		limitations 12:18	mark 8:24 11:20 12:14	moment 13:5 28:23
IPR 7:2		limited 15:22 16:6	match 7:5 10:8	months 9:9 26:7
issues 7:17	K	Line 33:6,7,9, 10,12,13,15, 16,18,19,21	matter 13:4 15:10	more 30:8
it 5:1 6:12,21 7:16 8:3,17 9:7,22 10:7 11:6 12:1,3, 24 13:4,13, 19,25 14:18 15:11,20 16:15,24 17:7,13,21 18:5,15,16, 17,23 20:7 21:11,15 22:1,13 23:2, 23,24,25 24:16 25:5,7 26:4,13 27:13,15 28:20 29:14, 21 30:1,9	Kansas 31:4, 23	listed 22:2	maybe 17:11 18:6	morning 5:23
	know 6:15 15:9	LLC 5:17	me 6:15,16 8:3 9:5 10:9 11:2 14:22,24 17:10 19:23, 24 20:22,24 21:18 22:8,16 23:20 24:5,15 25:2,20,22 26:6 27:5,6, 10,16,22 28:8,10,18 29:14 30:15 31:6,7	Mr 5:11,16 10:1 13:7,8 16:3 17:8 19:21 21:24 22:3 28:4,6 30:15,21
	L	location 5:24 17:11 30:11	mean 10:3,20 21:15 27:14	Ms 5:13,22 7:23 8:2,23 9:2 11:19,23 12:13 23:11 30:14,17
	language 12:4,6,12,19 20:23,25 23:6,21 27:17	logically 20:11	meaning 10:13	much 21:11 30:3,4
	last 7:16 15:19 18:22 19:10 23:20	longest 23:4		my 6:20 9:4 10:19,22 12:24 13:12, 22 15:13,20 16:1 17:9,11, 14 18:4,6,8, 23 19:20,24 20:2 21:4
		look 11:3 20:3 21:14 25:4 26:6,12 28:22		
		looking 18:20		

22:14 23:19 24:5,6,11,14 25:19,23 26:2 27:3,19 28:3, 11,12,17 30:6,22 31:8, 9 32:8,19	now 11:7 25:22 27:10 28:10 number 7:10 9:5 numbers 7:2	11,15,20,23, 25 29:3,11, 22,24 31:1,7, 8,10,13,15, 21,23 32:9,12 off 18:8 22:14 23:10 on 5:19 11:9 13:4,10 16:20 17:2 20:4 23:24 26:15 one 9:3 12:17 13:1 14:14 15:24 18:10 20:20 22:15 23:25 27:3 30:11 one-sentence 18:9 open 8:3 10:4 11:4,6 12:10 22:25 24:15 opened 11:16 opening 11:24 operate 26:14 opinion 10:12 12:18 15:20 17:7 18:23 22:6 28:19 29:4,10 opinions 10:22 17:9 18:11 20:2 25:1 28:5,9, 12 order 16:15 17:4 ordinary	28:15 other 6:9 15:2,14 19:1, 13 27:4,9 29:7 30:1 otherwise 31:14 out 7:17 13:5 22:15 30:7 outcome 31:15 output 13:20 outputs 26:14 over 6:9 16:14,21 own 13:12 Owner 5:17	parties 5:2 31:11,14 parts 29:25 patent 5:16 7:4,5,8,10,14, 20 8:7,8,11, 14,20 9:10, 14,17 10:15, 24,25 11:5, 14,17,20 12:3,8,10,11, 14 15:12 16:25 20:4 21:3,14 22:18,22 23:2,5,14 24:8 27:17 29:14 patents 9:18, 25 10:14 12:23 14:13 23:15 24:10 penalty 32:9 people 20:9 perceived 24:23 perform 15:16 perjury 32:9 person 28:14 perspective 21:8 petition 22:4 28:7 Petitioner 5:15,20 16:3 17:8 19:22 21:24 28:4 Petitioner's 13:8
N	O			
name 5:24 32:8 necessary 20:2 32:5 need 23:19 needed 17:7 neither 31:9 no 6:10 7:8 8:1,8 9:1,10, 15 11:20,22, 25 12:1,14,16 14:15 16:19 25:11 30:13, 17 31:21,23 nod 6:11 nor 31:10,14 not 6:9,24 8:4 9:15 10:4,8 12:2 13:12 14:16,23 15:22 17:1,24 18:4,8,10,17 19:19 20:1,8, 12 21:5 22:1, 9 23:18,19 24:18 26:7 31:12 notary 5:4 30:23 32:21	oath 10:5 Object 10:1 obviously 14:18 of 5:3,6,19,20 6:8,11 7:13, 19 8:13,19 9:3,8,13,15 10:13,21 12:3,8,17,18, 22 13:4,14, 17,20 14:2,3, 4,5,7,13,14, 19 15:3,14, 17,19,24 16:1,15,21,23 17:2,4,15,18, 19,21,22 18:1,5,8,12, 15,22 19:1, 10,14,16 20:3,7,9,10, 11,13,14,18, 19 21:3,6,7, 12,13,21 22:10,11,14, 21 23:1,5 24:14,24 25:8,16 26:10,12,14, 16,18,19,25 27:3,8,11,17, 23,25 28:2,		P	
			page 9:5 11:8 13:5 33:6,7,9, 10,12,13,15, 16,18,19,21 paragraph 9:5 13:4,6,7,17, 24 15:3,20 16:1 18:21,23 19:10 20:3,7 26:10,13 27:6,8,11 28:23,25 parse 27:10 28:10 part 17:4 29:22 particular 28:17	

please 5:24 6:14 11:4 12:10 20:21 23:2 26:9 27:16 point 9:2 17:10 19:23 22:8,15 pointed 28:23 portion 14:2, 4,6,11,12 16:22 17:2, 14,15,19,21 18:12 19:1,6, 16 20:8 26:14,17 27:20 29:2 portions 16:15 18:25 19:7,12 26:25 27:9,21 29:3, 7,11 POSITA 15:21 18:23 position 30:22 positioned 16:14 17:4 potentially 18:16 prepared 25:21 26:7 present 23:21 pretty 7:9 previous 27:3 previously 9:21 prior 14:19	probably 8:16 22:13 produced 5:19 proposed 13:8 provide 6:18, 23 16:4 26:8 provided 7:1, 7,14 8:6 9:14 13:3 17:6,9 18:4,10,15 21:25 26:10 provides 19:2 providing 18:11 public 5:4 32:21 pursuant 31:6 Q question 6:14,19,20 9:4 10:3,9 14:20 15:4 16:9 18:3 19:18 20:1,20 21:4,16 23:20 24:3,5,6,25 25:8,16,19 26:2 27:11, 13,14,19 29:13,16 30:16 questions 5:22 9:20 10:7 28:8 30:13,18	quite 24:19 R rather 6:10 rationalize 25:2 26:4 Raw 5:13,14, 22 7:23 8:2, 23 9:2 11:19, 23 12:13 23:11 30:14, 17 Re 33:3 re-ask 24:5 read 13:11,22 14:9 21:11 22:13 28:6,13 29:21 30:6,19 32:2 33:6,7,9, 10,12,13,15, 16,18,19,21 reading 13:25 15:13 27:1 28:16 29:5 33:4 really 15:6 27:23 reason 6:13, 22 33:6,8,9, 11,12,14,15, 17,18,20,21 reasoning 16:4 rebut 13:7 rebuttal 19:21 28:4 rebutting 16:3 21:23	recall 9:8 13:2 18:11,14 19:25 22:17 recognize 15:21 18:24 record 5:14, 25 7:23 8:8, 24 11:19 12:13 23:10 24:5 reduced 31:8 refer 9:3 27:17 reference 18:22 24:19 referring 9:6 13:25 24:12 regarding 24:21 relate 10:18 28:6 related 7:4 15:4 17:7 18:5,15 31:10 relating 7:7, 14,20 8:7,13, 20 9:9,14,22 16:2 24:22 30:3 relationship 19:15 relative 31:12 remember 7:3,4 24:21 reminders 6:5 render 32:5 repeat 19:9	25:19 rephrase 6:15 27:16 rephrased 27:24 report 13:23 15:14 16:1 17:11,14 18:4,6 19:20, 24 20:4 28:3, 5 30:6 reporter 5:5,9 6:6 30:19 31:1,2,3,21, 22 33:22 representatio n 15:23 represented 15:1 representing 5:14 represents 18:17 require 10:25 11:14 13:18 27:19 required 19:6 22:18 28:20 requirement 13:3 16:25 requires 23:3 rereading 26:1 rereview 18:6 reserved 5:7 residing 14:3 17:22 18:1
--	--	--	---	---

resolve 25:24	saying 17:1 21:16 25:13, 14 29:1	set 21:20	15:2 17:10 25:20 26:6 30:7	Steve 30:21
respect 9:24		shake 6:11		Steven 5:3,18 6:1 32:1 33:2
responding 16:2 17:8 22:2	says 5:20 23:24,25 26:13 27:13	share 10:22	somewhere 19:23	still 24:15
response 16:9 18:5 19:21	scenario 21:20	shares 9:17	sort 28:11	STIPULATED 5:1
responses 19:20	scope 15:17 20:10	Sheet 33:1	sounds 7:10 8:10	stop 13:23
restate 13:16	search 18:7	should 10:20 16:5 33:5,6,7, 9,10,12,13, 15,16,18,19, 21	speaking 10:5	stopped 13:25
review 21:2	second 14:4 16:14 17:14 18:12 19:7 20:8,21 26:14,25 27:21 29:2, 11,25	show 11:2 15:24	specific 28:19 30:8	subscribe 32:8
reviewed 10:3,4	section 11:9 13:11 21:25 22:1 31:6	showing 18:1	specifically 19:25	subscribing 33:4
right 6:3,13, 18 7:11 8:2, 10 20:5 23:17 24:2		sign 30:20,22	specification 9:17,21,22 10:19 14:13 22:8,13 23:17 24:12 28:14, 16 29:20	substance 32:4
RSMO 31:6		signature 5:6	specifications 9:24	such 32:3,7
S	see 7:16 10:7 13:15 16:20 18:19 20:6,15 21:15 23:4,5 26:21 27:5	simple 7:15 18:9	specified 14:7 30:4	support 22:9
said 16:21 19:8,10,25 22:12 29:8 30:17 31:7	select 20:13, 18 21:6,12 22:10 26:19	single 18:9	spot 28:17	sure 7:9 10:8 12:2 13:12 17:1,24 18:4, 8,10,17 19:19 20:1 23:18 25:12
same 8:15 9:17,20,23 10:9,13,18,20 18:21 19:9 23:16 24:12, 13 32:5	selected 20:11	slider 14:6,12 16:13,22 17:3 19:6,16 20:12,18 26:23 27:20 29:1,10 30:2	starting 13:6	sworn 5:19 31:6
Sandra 5:4 31:2 33:22	sense 10:20 24:11	small 8:16	state 5:24 15:20 20:14 21:7,13,21 22:11 31:21, 23	systems 15:14
say 6:7 12:25 16:17 19:3 20:7,17,23 23:24 25:5,7	sentence 15:3,19 18:22 19:4,10 20:7 26:12 27:7,23 28:22,25 29:5	some 7:15 8:16 14:19 15:17 21:25	statement 15:4 20:25 21:5 22:9 27:8	T
	separate 26:5	Someone 16:20	states 15:13	take 11:3 22:14 29:14
		something	stating 16:7 26:23	taken 5:3 31:7,12
				taking 6:7
				talk 6:9 13:3, 13 14:17

15:10 16:22 17:12,13,16, 20 24:17,25 25:21 talked 17:11 18:16 26:6 27:3 talks 13:19 21:15 29:21, 23 Tecce 5:11,16 10:1 30:15,21 Technologies 5:17 33:3 tell 9:5 term 10:12 14:18 15:10 17:16 18:22 terms 28:20 Tesla 5:15 33:3 testimony 6:23 9:13 23:19 31:5,7 than 6:10 15:2 20:13,19 21:6,13,21 22:10 25:9 Thank 24:2,4 that's 9:4 11:9 13:10 15:9 16:9,11 17:23 21:10 25:13, 14 29:8 them 7:3,4 17:12 22:20 27:3 then 9:23	13:19,22 25:15,23 there's 8:16 17:14 18:9 25:16 28:17 30:1 thereafter 31:8 thereon 32:7 thereto 31:14 33:4 these 14:13 25:3 thing 10:20 13:1 29:21 things 24:24 think 8:15 10:2 13:7 17:6 22:5 23:22,23 24:15 27:2 29:17,18 30:9 third 14:6 16:22 17:15 19:5 26:17 27:20 this 13:10,11 15:10 17:15 21:25 22:1 23:19 28:5,21 30:5 31:11 those 7:5,17 9:23 10:23 24:24 25:1 thought 14:21 three 10:14, 16 18:25 19:12 26:5 27:9 29:7	three- component 30:11 through 7:16 13:6,11 29:15 Thus 18:23 tied 10:19 16:11,23 time 7:16 times 6:4 Tippins 5:4 31:2 33:22 to 6:9,19 7:1, 4,7,14,20 8:3, 7,14,20 9:3,6, 9,14,22,24 10:1,3,18,21 11:2,8 12:4, 11,24,25 13:11,22,25 14:21 15:4,6, 9,15,22 16:2, 6,9,11,13,16, 23 17:4,7,8, 10 18:5,15,17 19:6,21,23,24 20:18,23,24 21:1,2,8,9,17, 20 22:1,2,8, 12,15,16 23:1,2,19 24:12,17,22, 25 25:2,4,5,7, 11,12,15,21, 22,23 26:2,6, 7,9,18,19,24 27:4,7,10,14, 15,17,20 28:4,6,10,11, 12,13,14,16, 18,21,23	29:14,15,22 30:3,6,7,19, 22 31:6,8,10, 11 32:4,5,8 today 6:5,7, 13,23,25 7:12,21 8:12, 21 9:2,12 22:22 24:17 25:2,21 together 10:19 29:19 30:5 too 21:11 took 9:9 top 18:8 22:14 transcribed 5:5 transcript 10:5 true 9:23 32:5,10 truthful 6:23 try 25:2,23 27:15 28:14 30:7 trying 21:8 27:4 two 25:2 typewriting 5:6 31:9 typos 7:15 8:16 U U.S. 8:8 9:10 11:20 12:14	uncharged 14:5,11 30:2 under 10:5 31:9 32:9 understand 6:3,14,25 7:6 8:6 10:2,10, 17,24 11:13 14:20 18:3 19:18 24:25 28:14,15 29:1,13,16 understood 6:20 20:20 unitary 11:1, 9,14 12:4,12, 19,21 13:18 14:1,14,22,25 15:8,21,25 16:5,11,16 17:12,16,17, 19 18:13,24 19:11,16 21:9 23:9,14,22,24 24:8 25:9,17 26:25 29:6,11 30:5,10 unless 22:15 until 26:4 up 7:5,18 8:17,18 10:9 11:17 14:19 Upon 33:4 use 12:6 15:9 20:18 used 15:10 21:10 22:1 24:20 30:9 useful 27:18
---	---	--	--	---

user 20:12,17 21:5,12,17,20 22:9 26:19,24 utilized 15:15 V vehicle 11:1, 10,14 12:5, 12,19,21 13:18 14:1,4, 6,14,22 15:1, 8,21,25 16:5, 12,16 17:5, 19,23 18:13, 24 19:11,17 21:9 22:18 23:3,6,8,9,12, 14,25 24:7,9 25:8,10,17,18 26:17,25 29:3,6,11,22 verbal 6:10 very 6:8 via 20:12 view 15:25 16:13 17:3 19:5,14 23:7, 12 W want 9:3 14:21 15:6 19:24 20:24 21:17,20 22:15 24:15 25:2,11,12 30:19,22 way 7:3 23:18	we 6:5,6,7,8 7:24 8:24 10:21 11:19 23:23 24:5 we'll 12:13 we're 24:12 welcome 21:2 well 17:20 19:8 21:3,23 27:2 what 12:2,21 13:13 14:21, 24 17:18,23 18:16,17 19:3,24 21:18 23:20 24:6,19 26:4 27:13 28:6,14,21 29:8,23 30:21 what's 17:25 19:14 21:4 28:10 29:9 when 14:17 16:17,21 17:9 23:23 where 13:10 17:3,7 21:20 22:2 27:5,8 whether 21:19 25:8,16 which 7:8 8:7 9:5,10 14:7 16:7 24:13 27:5,20 30:3 31:11 while 22:14 26:17 29:15 whole 29:21	whose 31:4 why 14:16 16:3,4 will 6:6 7:24 8:24 10:8 20:12 21:5 22:9 with 7:20 8:20 9:23 11:24 12:1 19:1,7, 12 22:22 26:24 27:4,9, 21 29:2,7,10 30:1 within 16:8,11 26:16 32:4 without 15:16 25:25 witness 5:6 11:6 30:24 31:4,7 33:2 won't 29:20 wondering 21:19 word 10:8 15:9 30:8 work 29:15 would 5:9 8:3 9:23 11:16 14:10 15:21 18:24 21:17, 20 22:9,13 28:11,15 wouldn't 14:15 21:11 written 29:19 wrote 10:22	Y Yeah 10:2,16 16:1 20:22 21:2 22:5 23:16 24:11 26:11 27:5 28:3 29:16 yes 5:11 6:10, 12,17,21 7:5 8:11 9:7 11:9, 12,18 12:5,17 18:21 20:5 yet 8:4	
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