

UNITED STATES PATENT AND TRADEMARK
OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RØDE MICROPHONES, LLC AND
FREEDMAN ELECTRONICS PTY LTD,
Petitioners

v.

ZAXCOM, INC.,
Patent Owner

Case IPR2025-00230
U.S. Patent 7,711,443

JOINT STIPULATION REGARDING EXHIBITS FOR
DEPOSITION OF DR. CHRIS KYRIAKAKIS

In Paper 21, in reference to the exhibits utilized during the deposition of Dr. Chris Kyriakakis, Petitioners asserted that Patent Owner “did not properly label the documents with exhibit numbers compliant with 37 C.F.R. § 42.63(c)...” It is Patent Owner’s position that the exhibits were clearly identified and numbered sequentially and understood by the Deponent, and that any deviation was purely clerical in nature, which Patent Owner seeks to correct through this joint stipulation. Patent Owner represents that each of the five “Court Reporter Deposition Exhibit[s]” listed in the table below is identical to the corresponding “IPR2025-00230 Exhibit” listed in the table except for the exhibit label(s) in the lower right corner of each page of the document. In reliance on that representation, and in an effort to narrow the disputed issues in the case, Petitioners agree to the stipulation below regarding those five documents.

Specifically, the Parties jointly stipulate that, with the exception of the exhibit labels on the right, bottom corner (“Exhibit Labels”) (as discussed below), the five deposition exhibits correspond to the following exhibits already of record:

Court Reporter Deposition Exhibit No.	Document	IPR2025-00230 Exhibit No.
1	Declaration of Dr. Kyriakakis	1002
2	IPR2018-00972 Final Written Decision ("Judgment")	1014
3	U.S. Patent No. 6,825,875	1003
4	U.S. Patent No. 7,711,443	1001
5	NAGRA V 24 bit Linear Location Recorder	2018

The Exhibit Labels include labels added by the Court Reporter and those added by Patent Owner to the footer of the documents. The Exhibit Labels do not affect the substance of the documents. Other than the Exhibit Labels, the substance of each "Deposition Exhibit" and its corresponding "IPR2025-00230 Exhibit" is identical.

Date: September 19, 2025

Respectfully Submitted,

By: /Rita C. Chipperson/

Rita C. Chipperson Reg.

No. 54,031

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