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

-----X

ENTEGRIS, INC., :
Petitioner, : IPR 2025-00267
v. :
INPRIA CORP., : Patent No.
Patent Owner.: 11,673,903

-----X



REMOTE STENOGRAPHIC DEPOSITION OF
JOSEPH RIVERS, Ph.D.
Friday, January 9, 2026
10:01 a.m. Central Time

Job No.: 614393
Pages: 1 - 171
STENOGRAPHICALLY REPORTED BY:
GISELLE MITCHELL-MARGERUM, RPR, CRI, CCR, LCR, ACCR, CSR
CALIFORNIA CSR 14424

1 Deposition of JOSEPH RIVERS, Ph.D., held
2 remotely, via videoconference at:

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5 VIA VIDEOCONFERENCE
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9 Pursuant to agreement, before Giselle
10 Mitchell-Margerum, Registered Professional Reporter,
11 Certified Reporting Instructor, Licensed Court
12 Reporter (TN), Certified Court Reporter (GA),
13 Certified Court Reporter (NJ), Certified Court
14 Reporter (WA), Certified Shorthand Reporter (OR),
15 Certified Shorthand Reporter (CA), Alabama Certified
16 Court Reporter (ACCR), Certified Court Reporter
17 (NM) .
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A P P E A R A N C E S

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202.551.1700

ALSO PRESENT:

ERIC NIELSON

NIDHI KISSOON

MAKSIM MINTS

1 KY SHANKLKIN, Document Technician

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W I T N E S S I N D E X

Witness	Page
JOSEPH RIVERS (sworn)	7
Examination by MICHAEL WOLFE	7
Examination by ELIOT WILLIAMS	168

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E X H I B I T I N D E X

No.	Description	Page
Exhibit 2046	Declaration - Joseph Rivers	29
Exhibit 2047	[REDACTED]	115
Exhibit 2048	[REDACTED]	148

1 P R O C E E D I N G S

2 COURT REPORTER: Dr. Rivers, please raise
3 your right hand.

4 Do you swear to tell the truth, the whole
5 truth, and nothing but the truth?

6 THE WITNESS: I do.

7 COURT REPORTER: Okay. We can start.

8 JOSEPH RIVERS

9 Having been duly sworn testified as follows:

10 EXAMINATION BY ATTORNEY WOLFE:

11 Q. Thank you for joining us, Dr. Rivers. My
12 name is Michael Wolfe. I represent the patent
13 owner, Inpria Corporation, and I'll be taking your
14 deposition today.

15 Have you ever been deposed before?

16 A. No.

17 Q. Okay. So I'll go over some of the ground
18 rules as we are getting going.

19 As you just heard, we have a court
20 reporter on the line, and it's very important for us
21 not to speak over one another because the transcript
22 can get messy because of that.

1 She can't hear who is talking and can't
2 write it down. And she is writing down what each
3 and every person is saying. The questions I ask and
4 answers you give.

5 Do you understand that?

6 A. Yes.

7 Q. So we were just talking about basics for
8 deposition purposes. You understand that you are
9 under oath today. Right?

10 A. Yes.

11 Q. And you understand that that's the same
12 oath that you would be giving if you were testifying
13 live in court. Right?

14 A. Yes.

15 Q. Is there any reason you can't testify
16 completely, truthfully, and accurately today?

17 A. No.

18 Q. Okay.

19 And as we go along in this proceeding, do
20 you know who is representing you today for the
21 deposition?

22 A. Yes.

1 Q. And who is that?

2 A. Eliot.

3 Q. Okay.

4 So I believe Eliot's counsel for Entegris.
5 And as I'm asking you questions, your counsel might
6 have objections to my questions, but you are still
7 obligated to answer my questions.

8 Do you understand that?

9 ATTORNEY WILLIAMS: Objection to form.

10 THE WITNESS: Could you be more clear?

11 ATTORNEY WOLFE: Yeah.

12 BY ATTORNEY WOLFE:

13 Q. In terms of just exactly like what just
14 happened. I might ask you a question.

15 A. Right.

16 Q. Counsel might have an objection to that
17 question, and you are still obligated to answer that
18 question. Do you understand?

19 A. Yes.

20 Q. Okay. Where are you today?

21 A. I'm in Round Rock, Texas.

22 Q. Why were you in South Korea when you

1 signed your declaration?

2 A. I travel routinely for work to visit
3 customers, suppliers, and clients.

4 Q. Okay. So you were on a work trip in Korea
5 at that time. Is that right?

6 A. Yes.

7 Q. And one other basics for depositions. I'm
8 going to need a verbal answer, and it's particularly
9 important on the Zoom call, because if you nod or
10 say "uh-huh" or "uh-uh," it's hard to transcribe
11 that.

12 Do you understand?

13 A. Yes.

14 Q. Thank you.

15 Is there anyone else in the room with you
16 right now?

17 A. No.

18 Q. On the screen in front of you, do you have
19 a computer open?

20 A. Yes.

21 Q. Is -- are there any applications running
22 on that, like email or messaging applications?

1 A. No.

2 Q. Are there any applications other than Zoom
3 open?

4 A. No.

5 Q. Do you have any notes in front of you?

6 A. The only thing I have in front of me is a
7 clean copy of my statement.

8 Q. Okay. Your declaration. That's great.
9 We'll get to that one. When did you begin working
10 on this case?

11 ATTORNEY WILLIAMS: Objection to form.

12 THE WITNESS: Can you clarify "working on
13 this case?"

14 BY ATTORNEY WOLFE:

15 Q. Are you involved in this IPR?

16 ATTORNEY WILLIAMS: Objection to form.

17 THE WITNESS: I oversee products -- I
18 oversee a product that's related to this --
19 this IPR.

20 ATTORNEY WOLFE: Okay.

21 BY ATTORNEY WOLFE:

22 Q. So you oversee products that are related

1 to this IPR. When were you first contacted
2 regarding this IPR?

3 ATTORNEY WILLIAMS: Objection to form.

4 THE WITNESS: Can you clarify? The IPR
5 itself? Or the statement that I'm making?

6 BY ATTORNEY WOLFE:

7 Q. The IPR itself.

8 A. Well, I'm aware of the IPR that we filed
9 in December of 2024.

10 Q. You are aware of the IPR that was filed in
11 December of 2024. Were you involved in the filing
12 of the IPR that was filed in December of 2024?

13 ATTORNEY WILLIAMS: Objection to form.

14 THE WITNESS: Can you clarify, what do you
15 mean by "involved?"

16 BY ATTORNEY WOLFE:

17 Q. In December of 2024, were you aware that
18 an IPR was being filed?

19 A. Yes.

20 Q. And did you review any of the materials
21 for the IPR?

22 A. Not in detail.

1 Q. Did you review any of the materials at
2 all?

3 ATTORNEY WILLIAMS: Objection to form.

4 THE WITNESS: I was aware that there was
5 an IPR being filed, and its general contents.

6 BY ATTORNEY WOLFE:

7 Q. You were aware of the petition's general
8 contents? Is that what you are saying?

9 A. I'm aware that we filed -- we were filing
10 an IPR to invalidate the referenced patent.

11 Q. Right. But back when the IPR was being
12 filed, you understand that it was being filed in
13 December of 2024. Right?

14 A. Yes.

15 Q. At that particular time, had you reviewed
16 any materials for the IPR?

17 ATTORNEY WILLIAMS: Objection to form.

18 THE WITNESS: I did not review the
19 document in detail.

20 ATTORNEY WOLFE: Okay.

21 BY ATTORNEY WOLFE:

22 Q. You didn't review any of the documents

1 regarding the December 2024 IPR. Right? At that
2 time?

3 ATTORNEY WILLIAMS: Objection to form.

4 THE WITNESS: No. I did not review the
5 IPR.

6 ATTORNEY WOLFE: Okay.

7 BY ATTORNEY WOLFE:

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1 THE WITNESS: Eliot, I have a question.

2 ATTORNEY WILLIAMS: You have a question
3 about privilege?

4 THE WITNESS: Yeah.

5 ATTORNEY WILLIAMS: Okay. Let me ask,
6 Michael, do you want us -- do you want to go
7 off the record so we can resolve that? Or do
8 you want to ask a different question?

9 ATTORNEY WOLFE: We can go off the record
10 and talk about privilege, but I do think we are
11 entitled to ask questions about materials that
12 he was -- the witness was provided, leading up
13 to, and forming the basis of his declaration.
14 So we can have that discussion.

15 And we can have a break so you can clarify
16 privilege, or you can give a caution to the
17 witness, as you've been doing. But I think we
18 can keep going, unless you feel it's
19 appropriate to step in and make an instruction
20 that's stronger of some sort.

21 ATTORNEY WILLIAMS: No. At this point,
22 let me -- let's go off -- okay. What we'll do,

1 we'll go -- what I propose is we'll go off the
2 record and I'll call the witness separately so
3 I can talk to him about the question he has.

4 And then we'll come back on the record,
5 and he'll try to answer your question, which,
6 as I understand it, is [REDACTED]

7 [REDACTED] Is that right?

8 ATTORNEY WOLFE: Yes. So far, yes.

9 ATTORNEY WILLIAMS: Okay. Let's just go
10 off the record.

11 ATTORNEY WOLFE: Okay.

12 (Off the record.)

13 ATTORNEY WOLFE: Can we have the question
14 read back, please.

15 COURT REPORTER: Hold on, please?

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ATTORNEY WOLFE: Okay.

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BY ATTORNEY WOLFE:

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6 BY ATTORNEY WOLFE:

7 Q. And then, let's move to sort of preparing
8 for today's deposition. What did you do to prepare
9 for today's deposition?

10 ATTORNEY WILLIAMS: Objection to form.

11 And caution the witness not to reveal the
12 contents of any attorney/client communications.

13 THE WITNESS: Reviewed my statement and
14 the -- the documents referenced therein.

15 BY ATTORNEY WOLFE:

16 Q. And other than the people that we spoke
17 about before, that you consulted with when preparing
18 your declaration, did you speak with anyone else
19 when you were preparing for your deposition?

20 A. No.

21 ATTORNEY WOLFE: And I think maybe I can
22 put the declaration now into the chat, but I

1 understand that you have a copy in front of
2 you.

3 (Exhibit 2046 marked for identification)

4 ATTORNEY WOLFE: And I just want to give
5 this for the court reporter, if you could mark
6 this as Exhibit 2046 for us, please?

7 Are you able to open that file?

8 THE WITNESS: Yes.

9 BY ATTORNEY WOLFE:

10 Q. And do you recognize that document?

11 A. Yes.

12 Q. And is that the same document that you
13 have in front of you in paper form?

14 A. Yes.

15 Q. Okay. So feel free to use either the
16 electronic, or the paper form. Whichever is easier
17 for you. Then can we turn to page seven? The last
18 page.

19 That's your signature. Right?

20 A. Yes.

21 Q. All right. And let's just turn back to
22 paragraph one, please. Here, you mentioned that you

1 are a Senior Director, Product Management, at
2 Entegris Inc.. And I think previously, you
3 mentioned that you run an organization of product
4 managers and R&D.

5 Is that right?

6 A. I am directly responsible for an
7 organization of product managers, who are what we
8 call the "BU." And R&D is a dotted line
9 organization to the Business Unit.

10 Q. Can you explain "BU?" Do you mean
11 Business Unit?

12 A. Yes.

13 Q. And what do you mean R&D is a dotted line
14 organization?

15 A. They exist as a separate organization.
16 But obviously, we work extremely closely, and
17 decisions and directions are tightly aligned between
18 R&D and the Business Unit.

19 Q. Understood. So you are technically
20 responsible for the Business Unit, but there is also
21 interface with the R&D group.

22 Is that how you would describe it?

1 A. Correct.

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1 Q. Looking back at your role at Entegris, how
2 long have you worked at Entegris?

3 A. Fifteen years.

4 Q. And how long have you been in your current
5 role?

6 A. Two years.

7 Q. And what role were you in before this
8 role?

9 A. I was a senior director of a different
10 portfolio of products.

11 Q. Sorry. Just to back up, you said you have
12 been in this current role for two years. Do you
13 remember when you moved to this role, exactly?

14 A. Yes. January of 2024.

15 Q. Okay. So that would have been after the
16 IPR was filed. Right?

17 ATTORNEY WILLIAMS: Objection to form.

18 THE WITNESS: Yes.

19 BY ATTORNEY WOLFE:

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Q. So, I think we turned to paragraph two.
And here, you mentioned you understand that in
December 2024, Entegris filed this IPR, challenging
the validity of U.S. Patent No. 1,673,903. Right?

Do you see that?

A. Yes.

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ATTORNEY WILLIAMS: I'm sorry, Michael.
When you get a chance, we have gone about an
hour, and I would like a break.

ATTORNEY WOLFE: Yeah. That sounds good.
Now is a good natural place.

ATTORNEY WILLIAMS: All right. Let's go
off the record.

ATTORNEY WOLFE: Thanks.

(Short break.)

BY ATTORNEY WOLFE:

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ATTORNEY WILLIAMS: Hold on. Hold on.

I instructed you not to answer, Joseph.

So you can either take that instruction or tell

1 him you are going to refuse the instruction.

2 He's just asking you to say that you are
3 going to follow my instruction. That's what's
4 happening right now.

5 ATTORNEY WOLFE: Or not. Up to the
6 witness.

7 ATTORNEY WILLIAMS: That's true. And
8 waive the privilege. He is the client. Not
9 me. But I instructed him not to answer.

10 ATTORNEY WOLFE: I mean, we disagree that
11 there is a privilege. Can you please explain
12 the basis for the privilege, when it is forming
13 the basis of his declaration?

14 ATTORNEY WILLIAMS: Oh. That's to me.
15 Yeah. I can, yes. Yes. So communications --
16 the content of communications between the
17 witness and his lawyers is privileged. We are
18 not waiving.

19 That's the -- that's the basis for the
20 instruction. And you asked -- you asked the
21 question that was calling for the content of
22 the communication between him and the lawyer.

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ATTORNEY WILLIAMS: Okay. Fair enough.
Then I'll let him answer that question yes or
no.

My instruction to you, Joseph, is to only
answer that question, yes or no.

THE WITNESS: Okay.

Can you repeat the question or read back
the question?

ATTORNEY WOLFE: Yeah. Let me try it this
way.

BY ATTORNEY WOLFE:

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ATTORNEY WOLFE: Okay.

BY ATTORNEY WOLFE:

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ATTORNEY WOLFE: I'm about to move on to
another set of questions. Maybe a -- give me a
sec. Yeah.

1 So I think it will take a little while to
2 go through the next set, so we might as well
3 break for lunch. I think if you are in Texas,
4 it's almost lunchtime.

5 THE WITNESS: Sure.

6 ATTORNEY WILLIAMS: Yeah. Let's go off
7 the record.

8 (Luncheon break.)

9 BY ATTORNEY WOLFE:

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1 BY ATTORNEY WOLFE:

2 Q. Regarding Inpria, when did you first learn
3 of Inpria?

4 A. I think I had some situational awareness
5 of Inpria in the photoresist space over -- I can't
6 recall back when it was, typically.

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14 ATTORNEY WOLFE: Okay.

15 BY ATTORNEY WOLFE:

16 Q. So prior to January 2024, you were
17 generally aware that Inpria existed in the
18 photoresist space. Right?

19 A. Yes.

20 Q. When did you first become aware of the
21 '903 Patent?

22 ATTORNEY WILLIAMS: Objection to form.

1 THE WITNESS: Upon -- you know, early
2 2024, upon onboarding.

3 BY ATTORNEY WOLFE:

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1 BY ATTORNEY WOLFE:

2 Q. Let's turn to paragraph seven, if we can.

3 ATTORNEY WOLFE: Sorry. I just swallowed
4 a bit of water. One second. I'm going to go
5 on mute.

6 [Pause.]

7 BY ATTORNEY WOLFE:

8 Q. Let's look at paragraph seven, if we can,
9 in the last sentence there.

10 "Entegris had no advance notice of the
11 settlement before it was executed and was not even
12 aware that Inpria and Lam were in settlement
13 discussions."

14 Do you see that?

15 A. Yes.

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22 ATTORNEY WILLIAMS: And, Michael, when you

1 get a chance, I would like to take a break.

2 ATTORNEY WOLFE: Yeah. Just one second.

3 Let me wrap this up.

4 BY ATTORNEY WOLFE:

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 Q. Understood.

9 ATTORNEY WOLFE: Yeah. Okay. I think now
10 is a good time for a break, then.

11 ATTORNEY WILLIAMS: Okay. Let's go ahead.

12 ATTORNEY WOLFE: Okay, good.

13 (Short break.)

14 BY ATTORNEY WOLFE:

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Q. Yep. Let me drop it in.

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ATTORNEY WOLFE: I'll ask that this be
marked Exhibit 2048. And I'll drop it in the
chat.

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(Exhibit 2048 marked for identification)

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ATTORNEY WOLFE: Let me know when you have
it up.

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1 ATTORNEY WOLFE: Okay.

2 BY ATTORNEY WOLFE:

3 Q. Are you going to accept your counsel's
4 instruction not to answer that question?

5 A. Yes.

6 Q. If your counsel hadn't instructed you to
7 not answer that question, would you be able to? Do
8 you have the knowledge?

9 ATTORNEY WILLIAMS: Objection to form.

10 THE WITNESS: No.

11 BY ATTORNEY WOLFE:

12 Q. You would not be able to answer that
13 question?

14 A. Sorry. Can you repeat the question?

15 Q. The question is, if your counsel had not
16 instructed you not to answer, would you have the
17 ability to answer? And that depends on the question
18 above.

19 ATTORNEY WILLIAMS: Yeah. I'll object.

20 Do you want the question above read back
21 so you know what he is talking about?

22 THE WITNESS: Yeah. Sure.

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1 Q. Okay.

2 ATTORNEY WOLFE: I think if we take a
3 short break now, I'll just take a quick pause.

4 ATTORNEY WILLIAMS: Sorry. My mic was
5 off. Yeah. We can go off the record. How
6 long do you need?

7 ATTORNEY WOLFE: Just like five or 10
8 minutes.

9 ATTORNEY WILLIAMS: Okay.

10 (Short break.)

11 BY ATTORNEY WOLFE:

12 Q. All right, Dr. Rivers. I have one
13 question.

14 During these breaks that we have had, and
15 including lunch, did anybody speak with you about
16 the substance of your testimony?

17 A. No.

18 ATTORNEY WOLFE: And with that, I'd like
19 to say thank you for your time today,
20 Dr. Rivers. We really appreciate you being
21 available to answer our questions.

22 We have no further questions at this time.

1 ATTORNEY WILLIAMS: Okay. I need some
2 time to look back at a couple things and
3 discuss with the witness some of his testimony.
4 So let's take a break and we'll come back on
5 when we are ready.

6 Hopefully, it wouldn't be more than 15, 20
7 minutes.

8 ATTORNEY WOLFE: Okay.

9 ATTORNEY WILLIAMS: Thank you.

10 (Short break.)

11 EXAMINATION BY ATTORNEY WILLIAMS:

12 Q. Dr. Rivers, early in your deposition, you
13 were asked about the date you moved into your
14 current role.

15 Do you remember that?

16 A. Yes.

17 Q. Okay. And you were asked a question.
18 I'll just read the transcript as I see it. The
19 question was.

20 "Okay. So that would have been after the
21 IPR was filed. Right?"

22 And the answer was yes. Do you remember

1 giving that testimony?

2 A. Yes.

3 Q. Is that testimony correct?

4 ATTORNEY WOLFE: Objection. Leading.

5 BY ATTORNEY WILLIAMS:

6 Q. You can answer.

7 A. Yeah. I think I was confused. Of course,
8 I joined in January of 2024 and the IPR was filed in
9 December of 2024.

10 Q. So do you recall being in your current job
11 when the final decision was made to file the IPR?

12 ATTORNEY WOLFE: Objection. Leading.

13 THE WITNESS: Yes.

14 ATTORNEY WILLIAMS: We have no further
15 questions.

16 ATTORNEY WOLFE: Okay.

17 If we could take a short break?

18 ATTORNEY WILLIAMS: Sure.

19 ATTORNEY WOLFE: I'll confer. Let's just
20 say like 10 minutes. Okay?

21 ATTORNEY WILLIAMS: Sure. That's fine.

22 (Short break.)

1 ATTORNEY WOLFE: We have no further
2 questions. Thank you for your time,
3 Dr. Rivers.

4 THE WITNESS: Thank you, Michael.

5 (Whereupon, the deposition adjourned at
6 2:31 p.m. Central Time)

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REPORTER'S CERTIFICATE

I, GISELLE MITCHELL-MARGERUM, the undersigned, a Registered Professional Reporter, Certified Reporting Instructor, Licensed Court Reporter, and Certified Court Reporter, do hereby certify:

That, JOSEPH RIVERS, Ph.D., the witness whose deposition is hereinbefore set forth, was duly sworn by me before the commencement of such deposition and that such deposition was taken before me and is a true record of the testimony given by such witness.

I further certify that the adverse party, INPRIA CORP., was represented by counsel at the deposition.

I further certify that the deposition of JOSEPH RIVERS, Ph.D., occurred virtually on Friday, January 9, 2026, commencing at 10:01 a.m. to 2:31 p.m.

I further certify that I am not related to any of the parties to this action by blood or marriage, I am not employed by or an attorney to any of the parties to this action, and that I am in no way interested, financially or otherwise, in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 12th day of January, 2026.



GISELLE MITCHELL-MARGERUM, RPR, CRI, CCR, LCR, ACCR, CSR



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CERTIFICATE OF DEPONENT

I, JOSEPH RIVERS, hereby certify that I have read the foregoing pages, numbered 1 through 169, of my deposition of testimony taken in these proceedings on Friday, January 9, 2026 and, with the exception of the changes listed on the next page and/or corrections, if any, find them to be a true and accurate transcription thereof.

Signed:
Name: JOSEPH RIVERS
Date: