

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ZHUHAI COSMX BATTERY CO., LTD.,  
Petitioner

v.

NINGDE AMPEREX TECHNOLOGY LIMITED,  
Patent Owner

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Case IPR2025-00431  
U.S. Patent No. 11,799,131

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**PETITIONER'S NOTICE OF DEPOSITION  
OF DEAN R. WHEELER, PH.D.**

Please take notice that pursuant to 37 C.F.R. § 42.53, Petitioner Zhuhai CosMX Battery Co., Ltd. (“Petitioner”), through its attorneys, will conduct cross-examination by deposition of Patent Owner’s Declarant, Dean R. Wheeler, Ph.D., in IPR2025-00431 (U.S. Patent No. 11,799,131). Pursuant to 37 C.F.R. § 42.53(d), and as agreed by counsel, Dr. Wheeler’s deposition will take place beginning at 10:00 am Mountain Time for up to 7 hours of cross-examination on January 28, 2026. The deposition will be conducted at Regus – Downtown Provo, located at 180 N. University Avenue, Ste. 270, Provo, Utah, 84601. This deposition will be recorded by audio, stenographic, and/or visual means, before a certified court reporter and/or duly qualified officer to administer oaths. It may also be transcribed by real-time reporting software. In accordance with 37 C.F.R. § 42.53(d)(1), the parties have conferred and agreed upon the time and place of the deposition.

In accordance with the Parties’ Notice of Stipulation Regarding Scheduling Order (Paper No. 29), the deposition will take place more than one week prior to the due date for Patent Owner’s Response to the Petition, thereby complying with 37 C.F.R. § 42.53(d)(2).

Respectfully submitted,

LEE & HAYES, P.C.

/James D. Stein/

James D. Stein  
Registration No. 63,782  
Lead Counsel for Petitioner

Date: January 6, 2026

**CERTIFICATE OF SERVICE (37 C.F.R. §§ 42.6(e), 42.105(a))**

I certify that the above-captioned **PETITIONER'S NOTICE OF DEPOSITION OF DEAN R. WHEELER, PH.D.** was served in its entirety upon the Patent Owner on January 6, 2026, by email to the following addresses:

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Respectfully submitted,

LEE & HAYES, P.C.

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