

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

RYAN HARDIN AND ANDREWS

HILL §

Plaintiffs §

§

V. § C.A. No. 2:21-CV-0290-JRG

§

SAMSUNG ELECTRONICS §

CO., LTD., et al. §

Defendants §

VIDEOTAPED DEPOSITION

OF

RYAN J. HARDIN

SEPTEMBER 27, 2022

VOLUME 1 OF 1

Videotaped Deposition of Ryan J. Hardin, produced as a witness at the instance of the defendants, and duly sworn, was taken in the above-styled and numbered cause on the 27th day of September, 2022, from 10:03 a.m. to p.m., before Camille A. Bruess, CSR, RPR, in and for the State of Texas, reported by stenographic method with the witness appearing at the law firm of Winston & Strawn, LLP located at 800 Capitol Street, Suite 2400, Houston, Harris County, Texas 77002, pursuant to notice and in accordance with Rule 30 of the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

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H2 Intellect - Exhibit 2042

Home Depot v. H2 Intellect - IPR2025-00480

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Videographer

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* * * * *

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1 plaintiff, Andrew Hill and Wesley Hill.

2 MR. HARBER: Adam Harber of Williams &
3 Connolly for the defendants and with me is Shayon Ghosh,
4 also with Williams & Connolly.

5 THE REPORTER: Does counsel have any
6 stipulations they would like to put on the record before
7 we begin?

8 MR. HARBER: No.

9 MR. WALKER: No.

10 THE REPORTER: Okay. Please raise your
11 right hand, sir. I'm going to go ahead and swear you
12 in.

13 RYAN J. HARDIN,
14 having been first duly sworn, testified by videotape as
15 follows:

16 EXAMINATION

17 BY MR. HARBER:

18 Q. Good morning, Mr. Hardin.

19 A. Hi.

20 Q. Can you state and spell your name for the
21 record?

22 A. Yes. Ryan, R-y-a-n, Jeffrey, J-e-f-f-r-e-y,
23 Hardin, H-a-r-d-i-n.

24 Q. Do you sometimes go by Jeff instead of Ryan?

25 A. Yes.

1 Q. And -- and why did you, uh, decide not to hire
2 another attorney or patent agent after Mr. Simmons
3 withdrew?

4 A. Uh, I thought that I could do it myself.

5 Q. Why?

6 A. I'm a competent person.

7 Q. Did you think you understood the rules of patent
8 prosecution?

9 MR. WALKER: Objection, form.

10 A. I thought that I could prosecute the patents
11 myself.

12 Q. Did -- did you think you understood the rules of
13 patent prosecution?

14 MR. WALKER: Objection, form.

15 A. I think that I could follow the rules.

16 Q. Did you think you understood the rules of patent
17 prosecution?

18 MR. WALKER: Objection, form.

19 A. I think I understood the rules enough to follow
20 them.

21 Q. What would you say is the subject matter of the
22 three patents that you're asserting in this case?

23 MR. WALKER: Objection, form.

24 A. That's a broad question. Can you -- can you
25 narrow that down?

1 intend to tell the jury about how you came up with the
2 ideas that are claimed in your patents?

3 MR. WALKER: Objection, form.

4 A. I will tell them the story of -- of, uh, how I
5 came up with the idea.

6 Q. And what is that story?

7 MR. WALKER: Objection, form.

8 A. I mean where would you like me to start?

9 Q. At the beginning.

10 A. Okay. Uh, I had just gotten out of a meeting
11 with a friend of mine who owned a car dealership. I was
12 interested in the digital billboard business at the time
13 with Mr. Hill and upon seeing the challenges of expense,
14 uh, and the -- of -- of having a digital billboard and
15 also the limitations of that solution in providing
16 content to consumers.

17 Uh, after that meeting I was getting in my
18 vehicle to go to my next appointment, and I took my
19 phone out of my pocket and realized that I have a
20 digital billboard in my pocket and every one soon would
21 be having a digital billboard in the pocket. So I kind
22 of solved that problem. Uh, so then I pursued that idea
23 and discussions with Mr. Hill on -- on different problem
24 areas that needed solutions in that area.

25 Q. Do you recall when that meeting was that you

1 just described at the car dealership?

2 A. Yes. That was 2007.

3 Q. Who was it that you were meeting with there?

4 A. Scott Jordan.

5 Q. And why were you interested in digital
6 billboards at that time?

7 A. Uh, Mr. Hill and I were interested in other
8 business opportunities and that was one of them.

9 Q. And what was it that you saw that could be done
10 on a phone? What -- what was the -- how did you get
11 from the digital billboard to the phone?

12 A. How did I get to the digital billboard from the
13 phone?

14 Q. How did you get from the digital billboard to
15 the phone?

16 A. What do you mean get to from?

17 Q. You described how you initially wanted to use
18 digital billboards and then you decided that the phone
19 would be the billboard.

20 A. Uh-huh.

21 Q. How did you make that connection?

22 A. Well, on -- you see both. So, uh, yeah. It's
23 something that you carry and every one looks at it all
24 the time.

25 Q. And what was the -- were you trying to solve a

1 problem in the context of delivering advertisements to
2 phones?

3 MR. WALKER: Objection, form.

4 A. Was I trying to solve a problem -- say that
5 again? Sorry.

6 Q. Well, let me ask it this way. Do you think
7 you're the first one to come up with the idea of
8 delivering advertisements to mobile phones?

9 A. In what context?

10 Q. In any context.

11 A. (Pausing) It depends on what your definition of
12 deliver is.

13 Q. Well, what would -- what do you understand
14 delivered to mean?

15 A. Well, theres, I mean, for example, there's, uh,
16 there's display on a web page, for example, a mobile web
17 page that requires user interaction to go receive that
18 information. That information is stored on a server in
19 the Cloud. Then there's also push information that we
20 can -- that can be delivered to an application program
21 on a mobile device and those are two different forms of
22 delivery. One is at the request of the user. The other
23 one is done by an application program.

24 THE REPORTER: Wait. The one is -- repeat
25 what you just said.

1 A. One is done by a user requesting the
2 information. The other is done by the application
3 program.

4 Q. And so are you -- in your view your idea is to
5 push an advertisement from a mobile application program
6 to a user?

7 MR. WALKER: Objection, form.

8 A. My idea -- what -- what -- can you repeat the
9 question?

10 Q. Which -- you just gave two examples of what
11 delivery would mean?

12 A. Uh-huh.

13 Q. Which one do you think is your idea?

14 MR. WALKER: Objection, form.

15 A. The application context was an interesting
16 context that had not been pursued before.

17 Q. So is it your view that you are the first one to
18 think of the idea of delivering mobile advertisements
19 through applications on mobile phones?

20 A. I thought that was an interesting and unique
21 idea to explore, yes.

22 Q. I just want to be clear what the answer to my
23 question is. Is it your view that you are the first one
24 to think of the idea of delivering mobile advertisements
25 through applications on mobile phones?

1 of an area of interest before it was inside the area of
2 interest?

3 A. I would need to look at the claims of the patent
4 to see what they say. I believe that they just say
5 determination after it's been determined that the device
6 has entered.

7 Q. And in your view just saying after it has been
8 determined that the device has entered, that requires
9 knowing that the device was outside the area of interest
10 and then inside the area of interest at two different
11 points in time?

12 A. However that determination is made, excuse me.

13 Q. Is there anything else, any other aspects of
14 your invention you -- you and Mr. Hill were the first to
15 come up with?

16 A. (Pause) Yes.

17 Q. What?

18 A. Allowing an application program to, uh, specify
19 which area is of interest.

20 Q. What do you mean by that?

21 A. Selecting an area.

22 Q. And you're talking about allowing the
23 application program to select the area?

24 A. Yes.

25 Q. How is that done in your invention?

1 A. By providing information indicating they were --
2 the selection.

3 Q. But it's under your invention in the asserted
4 patents. It's the application that makes that
5 specification of what the area of interest is?

6 A. I would need to look at the claim language, but,
7 uh, yes, I think so.

8 Q. Have you ever heard of the term sponsor in the
9 concept of your invention?

10 A. Uh-huh.

11 Q. What does that mean?

12 A. Sponsor?

13 Q. Yes.

14 A. Uh, sponsor is something that does something on
15 behalf of something else.

16 Q. Like what?

17 A. Uh, like an application program.

18 Q. So in your view a sponsor and an application
19 program are the same thing?

20 A. In my view, uh, an application program acts as a
21 sponsor.

22 Q. Do your, uh, do your patents ever equate
23 sponsors and application programs?

24 A. Sorry, say that again.

25 Q. Do your patent -- does the patent specification

1 Q. Do you know why not?

2 A. Uh, the video is Google IO 2013, which is dated
3 after the priority date of our patents.

4 Q. So that's the reason you would not have
5 submitted this?

6 A. That's correct.

7 Q. Did -- did you, uh, consider whether to discuss,
8 to submit any information regarded android -- regarding
9 android location services to the Patent Office during
10 the prosecution of your patents?

11 A. If there was anything that was before 2009 that
12 I was aware of, then I would have, but I was not aware
13 of anything before 2009.

14 Q. What is ChamberPlanet?

15 A. ChamberPlanet is a name, uh, that Mr. Hill and I
16 gave to a, uh, to a service.

17 Q. Is it a company or is it a service or both?

18 A. Um, it's also or was a trademark name as well,
19 but it -- ChamberPlanet is not a company, but it is a
20 service.

21 Q. Is it a service of Pronet?

22 A. Uh, a service of Pronet. I'm trying to
23 understand what, uh -- it is a service that Mr. Hill and
24 I, uh, created.

25 Q. And did you create it as part of your work at

1 Pronet or separately?

2 A. We created that while we were -- while we are --
3 we are still owners of Pronet.

4 Q. And you and Mr. Hill are the sole owners of
5 Pronet, correct?

6 A. And when you say Pronet, I'm assuming Pronet
7 Solutions Corporation, our -- our business.

8 Q. Yes.

9 A. I don't think we've established that.

10 Q. Yes.

11 A. Yes, we are owners of the company. Yes.

12 Q. You are the owners of that company; is that
13 correct?

14 A. That's correct.

15 Q. And you each own 50 percent of that company?

16 A. Yes.

17 Q. When did you start -- start it?

18 A. (Sighs) uh, 2002, I believe.

19 Q. Is that after you graduated from college?

20 A. Yes.

21 Q. How did you meet Mr. Hill?

22 A. I met him, uh, at our youth group in church.

23 Q. When was that?

24 A. When I was a teenager.

25 Q. And how did you -- what is Chamber -- like what

1 is the service that is ChamberPlanet?

2 A. Uh, ChamberPlanet is a service that we --
3 provided -- that we provided Chambers of Commerce.

4 Q. The website service or something else?

5 A. A website. Well, it's a -- more than one thing.
6 It's a website and member management solution for
7 Chambers of Commerce.

8 Q. And what do you mean by member management
9 solution?

10 A. The members of the Chamber of Commerce can be
11 managed by the staff of the Chamber of Commerce through
12 the website.

13 Q. How many Chambers of Commerce have you supplied
14 the ChamberPlanet service to?

15 A. Um, let me think about it. I don't know
16 offhand. Six, I think.

17 Q. What are those? Which -- which chambers are
18 those?

19 A. The Henderson Area Chamber of Commerce, the
20 Greater Marshall Chamber of Commerce, Jacksonville
21 Chamber of Commerce, the Bullard Texas Chamber of
22 Commerce, Pittsburgh, Texas Chamber of Commerce, and
23 then there's another one in Florida, but its name fails
24 me at the moment.

25 Q. Do you still provide, uh, ChamberPlanet services

1 this page, there's a sentence that says, "Therefore,
2 paras 0019-0020 mainly indicates application program is
3 merely software that is running on the mobile devices;
4 applicant program is registered by the Applicant
5 developer/Applicant platform 108, but not the Sponsors,
6 and the Applicant developer 108 and Sponsors are two
7 different parties." Do you see that?

8 A. Yes.

9 Q. Do you agree in your specification that the
10 application developer and the sponsor are two different
11 parties?

12 MR. WALKER: Objection, form.

13 A. No.

14 Q. You think the examiner was wrong in this
15 projection in this statement?

16 A. Yes.

17 Q. Did you respond to this office action?

18 A. No.

19 Q. Why not?

20 A. (Pause) It's a long explanation. Uh, there's
21 probably more than one reason.

22 Q. What answer can you provide to my question of
23 why you did not respond to this office action?

24 A. Where would you like for me to start?

25 Q. I would like for you to answer my question

1 however you think accurately answers my question.

2 A. Okay. This rejection was received (flipping
3 pages) -- uh, when was the date of that? July 29th,
4 2016. In February -- February the 4th, 2016, my
5 daughter was born. It was a very happy day. My wife
6 received a c-section. My son was 18 months old. Uh, so
7 I'm taking care of three, a newborn baby and an 18-month
8 old and my wife, who just had a c-section. Uh, that was
9 February of 2016.

10 Less than one month later, my father
11 received a lung transplant in March of 2016. I was his
12 backup caregiver. My mother was his primary caregiver.
13 When they received the phone call that there's a donor,
14 they have three hours to make it to Houston. So they
15 made it to Houston. Uh, I had to dodge a train getting
16 there from the airport, but I did that 'cause they took
17 a -- my brother-in-law, he knows a pilot and he flew
18 them down to Houston. That was in March of 2016.

19 My mother was the backup caregiver.
20 Because they left the house in disarray in April of
21 2016, she went to go, uh, clean up around the house
22 because they left it quickly. When you're waiting for a
23 lung, you have your bags packed and you just go when you
24 get the call.

25 So she went back to Henderson, and no one

1 knows why, but she climbed a ladder and she fell and she
2 broke her back. That was April of 2016. So now I'm the
3 primary caregiver for both my mom and my wife and my dad
4 and my two babies. That was April, 2016.

5 I flew to go pick up my mom. She was in
6 Tyler at the highest level of care. I had to argue with
7 the administrative staff to get her to transfer her to
8 Houston so she could receive surgery. She broke her
9 back. She broke her pelvis. She broke her hand.

10 THE REPORTER: Wait a minute. Can you
11 slow down?

12 Q. So I don't --

13 A. I'm answering your question. So if you would,
14 please, allow me to answer your question, I would
15 appreciate it. You want to know why I didn't file or
16 why I did not respond to the application.

17 MR. WALKER: You can answer. He'll let
18 you finish.

19 A. Uh, that was in April of 2016. A few weeks
20 later or maybe a few days later -- it's hard to remember
21 'cause so much is going on at the time -- uh, so my mom
22 came here. She received surgery, but a few weeks later
23 around that period, uh, we received a phone call from my
24 wife's mother's family in the Dominican Republic because
25 my wife is Dominican. She had a heart attack. They had

1 not met their daughter yet, uh, their granddaughter yet.
2 So we had to get an emergency passport so that we could
3 go.

4 While we were waiting for the passport to
5 arrive, uh, my wife said I have this phone call -- I
6 mean I have this, uh, this appointment with the doctor.
7 Do you still want me to go? And I said, Sure. We're
8 here. We can't go anywhere. Might as well. It was for
9 a mammogram. It comes back she's positive for triple
10 positive for breast cancer. That was in May of 2016.
11 So we cancelled the trip. June 30th, 2016 she has
12 bilateral mastectomies. We were doing reconstructive
13 surgery at the same time as doing the breast cancer
14 surgery for the -- for the bilateral mastectomies. It
15 turns out that the lymph node diagnosis was
16 misdiagnosed, and she actually was positive and it did
17 actually get into the lymph nodes. So the
18 reconstructive surgery had to be put on pause. It's
19 called a DIEP Flap -- it's -- the acronym is D-I-E-P --
20 uh, where they take tissue from the stomach and they use
21 that to reconstruct the breasts. So the lymph nodes are
22 positive. Mr. Hill (pointing) was present at the
23 surgery. Uh, the doctors came to me, the plastic
24 surgeon and the breast cancer surgeon, arguing in front
25 of me what do you want to do? Do we want to do axillary

1 dissection or do you want to do radiation therapy?

2 THE REPORTER: Can you slow down?

3 A. Uh, conversations that I had with the
4 reconstructive surgeon was I was going in planning that
5 we were actually going to do radiation therapy as
6 opposed to axillary dissection. He had already lifted
7 up -- lift up the flap, uh, when the lymph nodes
8 diagnosis came back as positive. So we received a false
9 negative. He had to put his surgery on pause for us to
10 revisit now that she has to have, uh, chemotherapy and
11 radiation therapy because you cannot radiate tissue that
12 you transplant because it will fail.

13 Uh, she began chemotherapy treatment three
14 days after this rejection was provided by the Patent
15 Office. On August the 2nd, 2016 is when she began her
16 chemotherapy treatment. She received chemotherapy every
17 three weeks, uh, and it was brutal. (Pause) She began
18 radiation therapy in 2017 during the period of the
19 abandonment of when this application went abandoned.

20 I was in no capacity at all to provide any
21 response whatsoever to the Patent Office or to
22 Mr. Simmons so that he could proceed in responding to
23 the Patent Office if it was under his watch. I believe
24 that it was docked, still docketed in his system because
25 I was not aware of that application because, obviously,

1 I had much more important things on my mind. I do
2 recall a conversation that I had with Mr. Simmons about,
3 uh, what do you want to do with this application? If
4 you do not respond, it's going to go abandoned. And I
5 said, We have a continuation. Uh --

6 MR. WALKER: Hold on. I don't want you to
7 go into conversations with him about leaving this.

8 THE WITNESS: Okay.

9 A. Okay. It was irrelevant at the time. I was
10 not -- in no capacity to respond, uh, to anything of
11 substance here (indicating).

12 Q. Understood. And I'm sorry about all that and I
13 hope your wife is doing well now.

14 Can you give me the dates which you
15 believe you were in no, uh, capacity to participate in
16 the patent prosecution for your patent?

17 A. I don't believe I would say that I was in no
18 capacity to -- to prosecute. Uh, discussions with
19 Mr. Hill and I were, uh, keep the patents alive.

20 Q. So you were continuing to prosecute the patents
21 during the period you just described of your wife's and
22 your other family members health issues?

23 A. To the best of my ability, yes.

24 Q. And there was no period of time when you stopped
25 patent prosecution; is that fair?

1 said previously was that, uh, an application program is
2 a sponsor.

3 Q. Where does the patent indicate that an
4 application program can be a sponsor?

5 A. Uh, there are probably more than one place where
6 that, uh, that concept is there.

7 Q. Can you point me to any of them?

8 A. Yes. Uh, I need to read these really tiny
9 words. (Reading) (flipping pages.) (Pause) Paragraph
10 or No. 13 is at the top, whatever that's called. Line
11 35, "Various disclosed embodiments can be implemented in
12 hardware, software, or a combination containing both
13 hardware and software elements. In one or more
14 embodiments, the invention is implemented in
15 software ..., " And an application program is
16 sponsored -- is software and so that embodiment of a
17 sponsor can be an application program.

18 Another one is, uh -- and I'm sure that
19 there's -- there's more. Uh, No. 3 (pointing), it says,
20 "System 100 ... includes ..., " and then line 15, .
21 "... systems or individuals operating under control of
22 sponsor A 121, sponsor C 123, and sponsor B 125." And
23 so, uh, a system inherent in system is an application
24 program. And so the application program could be under
25 a sponsor's control.

1 And so in that case an application program
2 could also be a sponsor or, uh, can act on behalf of the
3 programmer who wrote the code. So, in essence, be a
4 sponsor, sponsor the developer in that manner.

5 Q. Anything else?

6 A. I'm sure that there are more, but those are just
7 two that just, uh, that I just recall without reading
8 the whole thing.

9 Q. You can't recall any other place that you think
10 suggests that the applications can be sponsors?

11 A. Sitting here with you today, I'm sure that there
12 are others, but sitting here with you today, I, uh --
13 there may be others, but that's all that I can do right
14 now.

15 Q. And what is a content delivery platform?

16 A. Oh, sorry. Line 40, No. 13, "Some embodiments
17 may be realized as a computer program product, and may
18 be implemented as a computer-usable or computer-readable
19 medium embodying program code ..." And, uh, the
20 understanding of that is that that is also an
21 application program, this, uh, computer program product.

22 Q. What are the sponsors when it's not in your view
23 computer software code?

24 A. What are --

25 MR. WALKER: Objection, form.

1 Q. What is the embodiment that is
2 claimed -- you're -- you're basically reading parts of
3 the patent that says this can be implemented in software
4 to say the sponsors must be able to do software and,
5 thus, must be an application? Is that -- am I
6 understanding you correctly?

7 MR. WALKER: Objection, form.

8 A. I -- I don't understand what you just said. I'm
9 trying to understand.

10 Q. You are reading parts of the specification that
11 say the invention can be implemented in software,
12 correct?

13 A. That's one of the paragraphs that I read, some
14 of the specifications that I read here (pointing), yes.

15 Q. In what claimed embodiment would sponsors not be
16 software?

17 MR. WALKER: Objection, form.

18 A. I don't understand the question.

19 Q. Is your view that sponsors are always software
20 within the scope of your invention?

21 A. No.

22 Q. What else could they be?

23 A. Uh, definition of sponsor includes, uh, persons
24 or organizations that arrange the parts of and carry out
25 an activity.

1 Q. Did you understand it at the time you filed your
2 patent application?

3 A. Yes. To an extent, yeah.

4 Q. But you don't understand it today?

5 A. That's not what I'm saying. What I'm saying is
6 that what I understand is that the content delivery
7 platform is not bound to be limited to a particular
8 location by this figure.

9 Q. Is there any, uh, is there anything else in the
10 patent that you think indicates the content delivery
11 platform can be on a mobile device?

12 A. Yes.

13 Q. What?

14 A. Uh, or No. 12, the last paragraph, "The methods
15 and processes discussed previously, as well as other
16 embodiments, may be implemented in a processing system
17 executing a set of instructions stored in memory, or on
18 a removable" computable -- a removable "computer
19 readable medium." And one example of a processing
20 system is a mobile device. And so in the content
21 delivery platform that embodiment may be implemented in
22 the processing system which includes mobile devices.

23 Q. Does that say that every aspect of the methods
24 and process is in a single mobile device?

25 A. It says, "The methods and processes discussed

1 previously, as well as other embodiments, may be
2 implemented in a processing system executing a set of
3 instructions stored in memory."

4 Q. Does that say that every aspect of the methods
5 and processes is in a single mobile device?

6 MR. WALKER: Objection, form.

7 A. It says, "The methods and processes discussed
8 previously, ... may be implemented in a processing
9 system ..." And my understanding is that a mobile
10 device is a processing system.

11 Q. Is there anything else in the patent?

12 A. Does that answer your question?

13 Q. Is there anything else from the patent that you
14 think says that a mobile device -- that a content
15 delivery platform can be on a mobile device?

16 A. Um, No. 13 (pointing), (reading) line 35,
17 "Various disclosed embodiments can be implemented in
18 hardware, software, or a combination containing both
19 hardware and software elements." A mobile device in the
20 context of this specification is comprised of hardware
21 and software and the content delivery platform is one of
22 the embodiments. And so it can be implemented in that
23 hardware, software, or combination containing both the
24 hardware and the software elements according to this
25 part (pointing).

1 Continue reading, "In one or more
2 embodiments, the invention is implemented in
3 software ..." And software, uh, is on a mobile device.

4 Q. Can soft- -- can software also not be on a
5 mobile device?

6 A. Yes.

7 Q. So it's saying that something software doesn't
8 necessarily mean it's on a mobile device, correct?

9 A. Right. But I believe that, uh, software that
10 runs on a mobile device, uh, is included, uh, when this
11 says software, that the invention is implemented in
12 software.

13 Q. Any other place do you think in your patent
14 describes that the content delivery platform can be on a
15 mobile device?

16 A. "Some embodiments ...," continuing 13, line 40,
17 "Some embodiments may be realized as a computer program
18 product, and may be implemented as a computer-usable or
19 computer-readable medium ..." My understanding is that
20 a mobile device has, uh, a computer program product on
21 it, uh, and has computer-usable or a computer-readable
22 medium, which is on a mobile device. I'm sure there are
23 others, but, uh ...

24 Q. Can you think of any others sitting here today?

25 A. Uh, not without reading the whole (indicating)

1 stipulations they would like to put on the record before
2 it concludes?

3 MR. WALKER: Nothing else.

4 MR. HARBER: No.

5 THE VIDEOGRAPHER: We are off the record
6 at 7:26, and this concludes today's testimony given by
7 Ryan Hardin.

8 (Deposition concluded at 7:26 p.m.)

9 (Signature waived.)

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

RYAN HARDIN AND ANDREWS
HILL §

Plaintiffs §
§

V. § C.A. No. 2:21-CV-0290-JRG
§

SAMSUNG ELECTRONICS §
CO., LTD., et al. §
Defendants §

REPORTER'S CERTIFICATION

VIDEOTAPED DEPOSITION

OF

RYAN J. HARDIN

SEPTEMBER 27, 2022

VOLUME 1 OF 1

I, Camille A. Bruess, Certified Shorthand
Reporter in and for the State of Texas and Registered
Professional Reporter, hereby certify to the following:

That the witness, RYAN J. HARDIN, was duly sworn
by the officer and that the transcript of the videotaped
deposition is a true record of the testimony given by
the witness to the best of my ability;

I further certify that pursuant to FRCP Rule
30(f)(1) that the signature of the deponent:

_____ was requested by the deponent or a party
before the completion of the deposition and _____ was or

1 _____ was not returned within 30 days from date of
2 receipt of the transcript. If returned, the attached
3 Changes and Signature Page contains any changes and the
4 reasons therefor:

5 ___X___ was not requested by the deponent or a
6 party before the completion of the deposition.

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

9 Mr. Walker 0 hours, 0 minutes

Mr. Hopkins 0 hours, 0 minutes

10 Mr. Hill 0 hours, 0 minutes

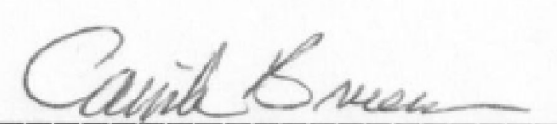
Mr. Harber 6 hours, 39 minutes

11 Mr. Ghosh 0 hours, 0 minutes

12 I further certify that I am neither attorney nor
13 counsel for, related to, nor employed by any of the
14 parties in the action in which this testimony was taken.

15 Further, I am not a relative or employee of any
16 attorney of record in this cause, nor am I financially
17 or otherwise interested in the outcome of the action.

18 Subscribed and sworn to on this 3rd day of
19 October, 2022.

20
21 
22

CAMILLE A. BRUESS, RPR, Texas CSR #3824

23 Expiration Date: 4/30/23

VERITEXT LEGAL SOLUTIONS

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Ft. Worth, Texas 76102

25 800-336-4000