

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

SHENZHEN TUOZHU TECHNOLOGY CO., LTD.,
Petitioner,
v.

STRATASYS, INC.,
Patent Owner.

Case IPR2025-00611 (US Patent No 11,886,774)

VIDEOCONFERENCE DEPOSITION OF

DENIS R. CORMIER

APRIL 3, 2026

Page 1 - 84 10:00 a.m. - 12:36 p.m.

REPORTED BY:

Tamara L. Houston

CA CSR No. 7244, RPR, CCRR No. 140, CRG

Job Number J14524664

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VIDEOCONFERENCE DEPOSITION OF DENIS R. CORMIER,
taken on behalf of the Petitioner, commencing from 10:00
a.m. to 12:36 p.m. EST, Friday, April 3, 2026, before
Tamara L. Houston, CSR No. 7244, CCRR, RPR, CRG.

THE SULLIVAN GROUP OF COURT REPORTERS

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DENIS R. CORMIER

SHENZHEN TUOZU TECHNOLOGIES vs. STRATASYS, INC.

APRIL 3, 2026

Tamara L. Houston, CSR No. 7244, CRR No. 140, RPR

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APRIL 3, 2026, FRIDAY

10:00 A.M. EST

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COURT REPORTER: My name is Tamara Houston,
California Certified Shorthand Reporter Number 7244.

DENIS R. CORMIER,
having been called as a witness,
who was thereupon examined and testified as hereinafter
set forth:

EXAMINATION BY MR. VINCENT:

Q. Good morning, sir.

Can you hear me?

A. Yes, I can hear you fine. Thanks.

Q. If at any time you cannot hear me well or if
you're having technical difficulties, just let me know,
then we can pause to fix things.

Is that okay?

A. Yes. And converse. I've told you I've had
some trouble with my computer the last 24 hours; so,
likewise, I'll let you know.

Q. Okay. I appreciate that.

Could you please state your name for the
record?

A. Denis Cormier.

Q. And you understand that you're under oath

1 today?

2 A. Yes, I do.

3 Q. Is there any reason, medical or otherwise,
4 that you cannot give truthful and accurate testimony
5 today?

6 A. No.

7 Q. If that changes throughout the course of the
8 day, will you please let me know?

9 A. Yes, certainly.

10 Q. If at any point today you need to modify an
11 answer that you had previously given me, I need you to
12 bring that to my attention during the deposition today.

13 Will you do that?

14 A. Yes.

15 Q. If you don't understand a question, will you
16 ask for clarification?

17 A. Yes.

18 Q. And if you answer a question, I will assume
19 you understood what was asked.

20 Is that fair?

21 A. Yes.

22 Q. Where are you physically located today?

23 A. Rochester, New York.

24 Q. Is there anyone in the room with you?

25 A. No.

1 Q. Do you have any physical documents with you?

2 A. I do not.

3 Q. Do you have any electronic documents with you?

4 A. Not in the room, no. Well --

5 Q. Are you --

6 A. -- to be -- relative to this case. Sorry.

7 Q. Do you have any electronic documents at your
8 immediate disposal in front of you right now?

9 A. No, I do not.

10 Q. Okay. Are you on a laptop?

11 A. Desktop.

12 Q. Do you have the Zoom screen open? Correct?

13 A. I do, yes.

14 Q. Do you have any other screens open?

15 A. I do not.

16 Q. Do you have any e-mail open?

17 A. Nope.

18 Q. Any chat programs?

19 A. No.

20 Q. If anyone attempts to contact you during the
21 course of your testimony today, will you let me know?

22 A. Yes, I will.

23 Q. If I use the term "patent owner" or
24 "Stratasys," will you understand that I'm referring to
25 Stratasys, Inc., the patent owner in this proceeding?

1 A. Yes.

2 Q. If I use the term "Petitioner" or "Bambu,"
3 will you understand that I'm referring to Shenzhen
4 Tuozhu Technology Company, Limited?

5 A. Yes.

6 Q. If I use the term "the '774 patent," will you
7 understand that I'm referring to U.S. Patent Number
8 11,886,774?

9 A. Yes.

10 Q. If I use the phrase "this IPR" or "this
11 proceeding," will you understand that I'm referring to
12 the IPR Proceeding Number IPR2025-00611 filed against
13 the '774 patent?

14 A. Yes.

15 Q. And if I use the phrase "your declaration,"
16 will you understand that I'm referring to Exhibit 2014
17 titled "Declaration of Denis R. Cormier"?

18 A. Yeah. I don't have the number memorized; but,
19 yes, that's correct.

20 Q. Great. I have placed into the chat the
21 document we just discussed, your declaration,
22 Exhibit 2014.

23 (Exhibit 2014 was referenced.)

24 BY MR. VINCENT:

25 Q. Please let me know when you've got it open.

1 A. Yes, it's open.

2 Q. Does your declaration set forth your own
3 opinions concerning the '774 patent and the prior art?

4 A. Yes.

5 Q. Do you have any opinions concerning the '774
6 patent or the prior art that you omitted from your
7 declaration?

8 A. That I omitted? Not off the top of my head,
9 no.

10 Q. In forming your opinions in the declaration,
11 did you rely on any assumptions that are not identified
12 in your declaration?

13 A. None that I can think of, no.

14 Q. Sitting here right now, do you have any
15 correct -- corrections to your declaration?

16 A. As I was reviewing things this -- we -- so I
17 didn't write them down. There -- there are one or two
18 places where there might have been a -- you know, a
19 paragraph that was -- should have been before or after.
20 But there were just one or two small things like that
21 that I happened to notice, but I didn't write them down.

22 Q. What do you mean by a paragraph before or
23 after?

24 A. I'm sorry. So if I referenced Douglas
25 paragraph such and such, it -- the paragraph that I

1 referenced maybe should have been the one before or the
2 one after. I think there might have been one place that
3 I spotted along those lines.

4 Q. So there's a single typographical error that
5 you're presently aware of in your declaration?

6 A. That I'm -- yeah. I believe so. And, again,
7 I won't swear that there are others that I didn't catch
8 reading through. But, yes, that I'm presently aware of,
9 yeah.

10 Q. Other than the error that we just discussed,
11 are there any changes that you'd like to make to your
12 declaration?

13 A. Nope. Not -- not standing here right now, no.

14 Q. Are there any opinions about which you are
15 less certain than other opinions in your declaration?

16 MR. KAPADIA: Object to the form.

17 THE WITNESS: That's a tough question to
18 answer. I -- I mean, there's nothing that I would
19 change my mind over, I guess, if that's -- if that's
20 what you mean.

21 BY MR. VINCENT:

22 Q. But sitting here right here right now, you
23 cannot think of any opinions about which you have less
24 confidence than other opinions?

25 MR. KAPADIA: Objection.

1 THE WITNESS: Not -- I'm sorry. Not standing
2 here right now.

3 BY MR. VINCENT:

4 Q. Do you have a hundred percent complete
5 confidence in every opinion that you offered within your
6 declaration?

7 MR. KAPADIA: Objection. Form.

8 THE WITNESS: I mean, given infinite time to
9 study things, you never know if you'll -- you know,
10 change -- change your opinion; but standing here right
11 now, there isn't anything -- there isn't anything that I
12 would change.

13 BY MR. VINCENT:

14 Q. Did you --

15 A. With any allowable time constraints, I guess.

16 Q. Did you read every word of your declaration?

17 A. I -- yes.

18 Q. Did you write every word of your declaration?

19 A. No. That was what a team -- a team effort.

20 It represents my opinions. But it was the drafting of
21 it, and then my review and final edits represent my
22 opinions.

23 Q. What percentage of the words in your
24 declaration did you write?

25 A. I have no idea. I -- I couldn't give you a

1 percentage.

2 Q. Could you estimate the percentage of words in
3 your declaration that were written by others?

4 A. I couldn't estimate the number. I mean -- no,
5 I don't have an estimate of the percentage.

6 Q. It's possible that other people wrote
7 99 percent of your declaration?

8 A. I don't think it was that high, but -- I doubt
9 it was that high. Let me put it that way.

10 Q. 99 percent would be too high of an estimation?

11 A. Yes. My -- my guess is that's correct.

12 Q. What's your best numerical estimation of the
13 portion of the words in your declaration that were
14 written by others?

15 A. That -- my experiences, my background, and
16 things like that.

17 Q. And as to the remaining sections in your
18 declaration, were those that were drafted by others?

19 A. I'm -- I'm sorry. Were the other sections
20 drafted by others?

21 Q. That's correct.

22 A. Is that -- the majority of it, yes.

23 Q. When did you start drafting your declaration?

24 A. I can't remember exactly. So I'm giving you a
25 hand waving, five or six months, maybe. It could have

1 been a little more; it could have been a little less.
2 In that general ballpark. Maybe it was a little bit
3 longer.

4 Q. That would put it around November 2025 that
5 you started working on your declaration?

6 A. Again, that -- in that general timeframe, I
7 guess.

8 Q. Okay.

9 A. You know, I -- I couldn't tell you the exact
10 month, but...

11 Q. That's fine, but it feels like it was closer
12 to turkey than Christmas?

13 A. I'm thinking it might have been a little
14 before -- before turkey but definitely not Christmas, I
15 don't think.

16 Q. Okay. Did the lawyers for Patent Owner
17 provide the first draft of your declaration?

18 A. So, yeah, based on -- based on our Zoom
19 meetings and conversations and things like that, yes,
20 with the -- well, the chunk that I wrote up front was
21 provided -- I provided that to them, and that was
22 incorporated into that draft.

23 Q. You provided the section under background to
24 the lawyers, and then they returned a fulsome draft with
25 the actual content after that?

1 MR. KAPADIA: Objection.

2 THE WITNESS: With the additional -- Yes, I'm
3 sorry, with the additional sections, yes.

4 BY MR. VINCENT:

5 Q. How many drafts of your declaration did you
6 review before ultimately signing it?

7 A. I don't remember a number. We went back and
8 forth three, maybe four times. At least three, I think.

9 Q. Do you have an estimate for the amount of time
10 you spent working on your declaration?

11 A. I would -- I think it was 20 -- well, maybe
12 closer to 30 hours. 25 or 30 hours is a best estimate.

13 Q. Did Patent Owner's lawyers provide any facts
14 or assumptions that you relied on to reach the opinions
15 and conclusions in your declaration?

16 A. Facts or assumptions, not -- not that I can of
17 a specific example of providing an assumption or
18 anything like that. If I'm understanding your question
19 correctly, yeah.

20 Q. When were you first contacted with an offer to
21 work on this matter?

22 A. This one, maybe it might have been last summer
23 or late summer, maybe, early fall. So I'll -- I'll give
24 an approximate nine-ish months ago, in that ballpark.

25 Q. Okay. Late summer or fall 2025, to be clear,

1 correct?

2 A. Correct.

3 Q. What information were you provided with to
4 help you determine whether or not to accept the
5 engagement?

6 A. So this one, I -- I can't remember the
7 timeline of when they provided me with the case
8 materials. So -- so we had a Zoom meeting to discuss --
9 to discuss the case, and I don't remember if the -- I
10 don't remember if the case materials were provided in
11 advance of an initial Zoom meeting or after.

12 Q. What were the initial case materials that you
13 were provided with to inform your decision of whether to
14 accept the engagement?

15 A. That was the -- the references, the --
16 basically all of the documents that form the basis of my
17 declaration. So it was the references, the petition,
18 Professor Hickner's declaration. Those were the basic
19 documents, yes.

20 Q. Before being provided with those documents,
21 had you ever come across the '774 patent?

22 A. I had not.

23 Q. Did Patent Owner's lawyers provide you with
24 any information before you accepted your engagement that
25 informed your ultimate opinions in this matter?

1 A. Well, there was -- there was a verbal
2 discussion.

3 Q. And did that discussion help you form your
4 ultimate opinions in your declaration?

5 A. So the -- well, it -- it was the basic
6 background of -- of the high level of facts of -- of the
7 case, and so did -- whether or not that discussion --
8 whether or not any content from that discussion ended up
9 into the declaration, I couldn't tell you, if that's
10 what you're asking. I don't remember specifics of that
11 conversation, you know, specific things that were said.
12 Just high-level what the discussion was about.

13 Q. The discussion set forth the patents, the
14 prior art, the arguments that the Petitioner made, and
15 the arguments that Patent Owner intended to make in
16 response?

17 MR. KAPADIA: Objection to form.

18 THE WITNESS: That's -- you're asking that
19 question in relation to the initial discussion; is that
20 correct?

21 BY MR. VINCENT:

22 Q. That's correct.

23 A. We did not get into that level of depth in
24 the -- in the initial discussion.

25 Q. You said you reviewed the petition that

1 initiated this IPR?

2 A. I've -- I've looked at it. I looked more
3 closely at Professor Hickner's declaration at that point
4 in time; but, yes, I have also looked at the petition.

5 Q. How many different times have you looked at
6 the petition?

7 A. Oh, I -- I have no -- I couldn't give you an
8 number. That was earlier -- earlier on. I don't
9 remember how many times I opened it.

10 Q. Safe to say you haven't looked at it in quite
11 a while though?

12 A. It -- a very -- in preparation for today, a
13 very cursory review of it. So as far as an in-depth
14 review, it's been -- it's been a little while. Yep.

15 Q. How long in total have you spent reviewing the
16 petition?

17 A. Oh, just that one document?

18 Q. That's right.

19 A. I -- I couldn't tell you minutes or hours. I
20 don't remember since it was a few months ago when I was
21 doing the review -- you know, the in-depth review.

22 Q. Probably less than three hours though?

23 MR. KAPADIA: Objection.

24 THE WITNESS: Probably -- I'm sorry.

25 MR. KAPADIA: Objection to form.

1 THE WITNESS: Most likely less than three
2 hours. Not -- not more, certainly.

3 BY MR. VINCENT:

4 Q. Is it fair to say that you disagree with the
5 petition's conclusions?

6 A. So on a -- my declaration goes point by point
7 through -- there isn't a single conclusion. There's,
8 you know, a whole series of conclusions based on the
9 different claim elements. So on that basis, yes, I
10 would -- there are elements of it that I disagree with.

11 Q. Do you recall any elements of the petition
12 with which you do agree?

13 A. So there -- there are elements that I did not
14 express an opinion on in my declaration. So I guess
15 that's-- the most I can say is if I didn't respond to it
16 in my declaration. I responded to the things that I --
17 that I felt there was the most logical arguments in
18 terms of differences of opinion.

19 Q. If you didn't respond to an argument in your
20 declaration, you agree with the position in the
21 petition?

22 MR. KAPADIA: Objection to form.

23 THE WITNESS: I -- I guess I wouldn't go so
24 far as to say I agree with them, but maybe -- using your
25 earlier question as an example, are there things that

1 I'm more confident about or less confident about, you
2 know, things where there are shades of gray where you --
3 you know, kind of hard to tell, those may have been
4 examples here where they were not responded to in my
5 declaration.

6 BY MR. VINCENT:

7 Q. And if you didn't respond to an argument in
8 your declaration, that means those are arguments in the
9 petition that you didn't think had strong enough
10 rebuttals worth putting into your declaration?

11 MR. KAPADIA: Objection to form.

12 THE WITNESS: I'm not sure I would word it
13 exactly that way, but not as strong as the ones that I
14 did put in my -- in my declaration, I guess, is a -- is
15 a better way to describe it.

16 BY MR. VINCENT:

17 Q. Would you then agree that Petitioner's
18 stronger arguments are not addressed in your
19 declaration?

20 MR. KAPADIA: Object to the form.

21 THE WITNESS: So, again, you're talking shades
22 of -- shades of gray here, so certainly the -- the ones
23 that might have been stronger arguments would include
24 the ones that I did not express an opinion on.

25

1 BY MR. VINCENT:

2 Q. Are you aware that Patent Owner Stratasys
3 filed a preliminary response to the petition in
4 July 2025?

5 A. I -- yes.

6 Q. Have you reviewed Patent Owner's preliminary
7 response to the petition?

8 A. Yes, when I was essentially doing homework in
9 preparation for the declaration.

10 Q. Did you read all of it?

11 A. Standing here today, I couldn't tell you if it
12 was cover to cover, if I read all of it. You know,
13 there -- there were portions that you skip over that you
14 don't -- as the -- as it relates to what needs to be
15 thought about for the declaration, there were sections
16 that I skipped over, a preliminary matter, I would
17 assume, that -- that I didn't think was necessary to
18 spend time on.

19 Q. How did you determine which sections you
20 needed to review to prepare your declaration?

21 A. So the typical -- typical approach starting in
22 this case with the '774 patent and looking at the claims
23 in that patent and then going to a document, I guess we
24 would -- any of us on this call would typically think of
25 it as speed reading, where you're -- skim a paragraph

1 and think whether or not it relates to -- if I think it
2 related to -- potentially related to a claim, and then
3 those are the ones where I would slow down and try to
4 read more carefully.

5 Q. When you were preparing your declaration, did
6 you think it important to be consistent with Patent
7 Owner's preliminary response to the petition?

8 A. Well, the -- I didn't think about it in those
9 terms. I would say it was more looking at -- so what --
10 anytime you read something, you read it and you say:
11 Yes, that makes sense or, you know, there might be cases
12 where you say: Oh, I'm not so sure about that one.

13 And so I would not say that I was making any
14 attempt to be consistent with what was in that
15 preliminary response. I was thinking independently in
16 that sense in terms of interpreting whether or not I
17 agreed with what it said or at a minimum if it looked
18 like a reasonable position.

19 Q. You mentioned not being sure about certain
20 positions and the Patent Owner's preliminary response.
21 Which ones were those?

22 A. I -- I have no idea. That was, again, long
23 enough to know -- long enough ago there's -- there's
24 nothing that comes to mind that I can -- there are no
25 specific examples that come to mind.

1 Q. There are no significant or material positions
2 in the Patent Owner's preliminary response that you
3 recall disagreeing with?

4 MR. KAPADIA: Objection to form.

5 THE WITNESS: At -- standing here today, I do
6 not have any memories of which -- which ones that -- I
7 don't have any specific memories or examples of ones
8 that I felt, in that first reading, did not seem
9 reasonable.

10 BY MR. VINCENT:

11 Q. Do you recall attempting to change your
12 declaration and its conclusions in a way that would
13 disagree with the patent owner's preliminary response?

14 A. I do not have any recollection of comparing --
15 of comparing my -- my work with the preliminary response
16 and having that be a factor in -- in whether it did or
17 did not agree.

18 I was not looking at the preliminary response
19 as a metric for -- for the content of my declaration.

20 Q. Are you saying that if the patent owner's
21 preliminary response contradicted the conclusions in
22 your declaration, you would not be aware of that?

23 A. Well, standing -- again, standing here right
24 now, the preliminary response was something I -- I had
25 gone through at the very, very beginning. I never

1 looked in the rearview mirror to compare. And so I --
2 so I think what you just asked, because I have forgotten
3 the precise wording, but I don't have recollection of
4 any -- of any disagreements between the two documents.
5 I -- I -- nothing comes to mind because I -- honestly I
6 wasn't comparing the two for consistency, for example.

7 Q. Are you aware that Patent Owner filed a
8 response to the petition?

9 A. Yes, yes, I'm sorry. I'm getting my documents
10 mixed up in my head. Yes.

11 Q. And to be clear, I'm referring to the brief
12 that was filed concurrently with your declaration, so
13 we're on the same page.

14 A. I believe we're talking about the same
15 document. Yes.

16 Q. Have you reviewed Patent Owner's response to
17 the petition?

18 A. I -- at that one point in time, yes.

19 Q. When was that point in time?

20 A. It -- it was sometime roughly in -- if --
21 if -- if I'm remembering correctly, it was -- it --
22 roughly in the same timeframe that -- that I was
23 preparing my -- my declaration.

24 Q. You --

25 A. But it was -- I -- actually, let me correct

1 that.

2 You're talking about the document -- I'm
3 sorry. You said the document that was submitted at the
4 same time, correct?

5 Q. With --

6 A. I'm sorry. That one I'm not sure -- I -- I
7 don't recall reading -- I could be mistaken. There are
8 so many documents that I looked at. I don't recall
9 reading that specific document. It's possible that I --
10 it's possible that I did, but I don't have a specific
11 recollection of reading that one.

12 Q. You don't recall whether you've read the final
13 version of Patent Owner's response that was filed in
14 January 2026 concurrent with your declaration?

15 MR. KAPADIA: Objection to form.

16 THE WITNESS: That's correct. The final
17 version, I -- that is correct. I don't have any
18 recollection of reading the document that was submitted
19 concurrently with mine.

20 BY MR. VINCENT:

21 Q. Do you recall whether you had reviewed any
22 pre-filing drafts of Patent Owner's response?

23 A. I -- I don't -- I don't believe I did. And,
24 again, I won't swear to it given the number of the --
25 the number of documents. But I don't -- I don't have a

1 recollection standing here today of reviewing drafts of
2 that particular document.

3 Q. Because of that you are unable to confirm the
4 accuracy of the arguments, assertions, or conclusions in
5 Patent Owner's response to the petition?

6 A. Well, if -- if I have not read -- assuming my
7 recollection is accurate that I haven't read the
8 document, then it would be correct to say that I cannot
9 address the accuracy of something I did not read,
10 assuming my recollection is correct.

11 Q. Assuming your recollection is correct that you
12 did not review any drafts, is it fair to say that you
13 had no input in crafting the arguments in Patent Owner's
14 response to the petition?

15 MR. KAPADIA: Objection to form.

16 THE WITNESS: That, I don't know in the sense
17 that because we were having meetings leading up to
18 submission of my declaration, I have no way of knowing
19 what they considered or didn't consider in that -- in
20 the drafting of that document.

21 BY MR. VINCENT:

22 Q. How many times have you been retained as a
23 testifying expert?

24 A. I believe this would be the fourth time.

25 Q. Do you recall how many of those engagements

1 were in the context of IPR proceedings?

2 A. Three.

3 Q. Is it three, including this one?

4 A. Yes. Sorry.

5 Q. And is another one of those also on behalf of
6 Stratasys?

7 A. Yes.

8 Q. And I think the third is also on behalf of
9 Stratasys, correct?

10 A. Correct.

11 Q. Stated more simply, you've been engaged to
12 provide expert support in three IPRs in your career all
13 of which were on behalf of Stratasys?

14 A. That's correct.

15 Q. Have you ever been retained as a testifying
16 expert in a district court case?

17 A. I believe the -- I don't remember the year;
18 but, yes, one -- one previous time.

19 Q. Was this on behalf of Markforged against
20 Desktop Metal.

21 A. Yes, that's correct.

22 Q. And you testified on behalf of the plaintiff,
23 Markforged?

24 A. Yes.

25 Q. Do you recall Dr. Ken Gall's participation in

1 that litigation?

2 A. The name rings a bell. Oh, he -- he's the
3 professor at Duke, I believe, who was -- I just can't
4 remember his -- I remember his face but not the name. I
5 believe he's -- he was a professor at Duke who worked
6 with Desktop Metal, if memory serves me correctly.

7 Q. Do you recall any of the opinions that he
8 offered in that case?

9 A. Any of the opinions that he offered? Is that
10 what you said?

11 Q. That's right.

12 A. I -- that was long enough ago that there isn't
13 a whole lot -- not a whole lot of the specifics that I
14 recall, including his testimony.

15 Q. Have you encountered Dr. Gall in your
16 professional life?

17 A. Not -- I won't -- I was a professor at North
18 Carolina State University for 15 years, and it's -- it's
19 possible we ran into each other, but I don't have any
20 memory of the two of us ever working -- I'm sorry, ever
21 meeting and saying hello outside of that case.

22 Q. Have your expert opinions ever been challenged
23 in any legal proceeding?

24 A. None that I'm aware of.

25 Q. What was your first exposure to 3D printing?

1 A. In approximately 19- -- excuse me, 1993 -- '92
2 or '93, I read an article about -- at that time it was
3 called rapid prototyping, but today 3D printing, so that
4 was my first time hearing about it. It was an article
5 in Manufacturing Engineering magazine.

6 Q. And were you in school at the time?

7 A. At that time I was finishing my Ph.D., that's
8 correct.

9 Q. How did you come across that article?

10 A. I taught manufacturing classes, and I was in
11 the student chapter of the Society of Manufacturing
12 Engineers, and we got the monthly magazine, so I just
13 read it at lunch time one day.

14 Q. But at that time you had yet to encounter a 3D
15 printing machine in person?

16 A. Correct. I purchased my first 3D printer in
17 1996. The University of -- another professor in the
18 university had a machine, and -- that he purchased in
19 1994, so that would have been the first time I saw a 3D
20 printer in person. And then 1996 was when I purchased
21 my first 3D printer.

22 Q. I've always been curious. Is there a
23 difference between the terms "rapid prototyping," "3D
24 printing," and "additive manufacturing"?

25 A. That's a -- we could spend the next six hours

1 talking about that, but the -- because there is raging
2 debates even to this day.

3 But just in terms of a general perception, so
4 rapid prototyping was the preferred or prevalent term --
5 most prevalent term in the 1990s when the industry was
6 in its formative stages, and the term "prototyping" and
7 the name denoted making prototypes rather than a
8 commercial part that, you know, might be an end-use
9 part.

10 3D printing, frankly, was just a new name that
11 people came up with, you know, roughly 2000 or so.

12 "Additive manufacturing" is the term that
13 tends to be preferred by industry because managers
14 don't -- they see a desktop 3D printer that their kids
15 use in the library or the makerspace, and they think
16 it's -- it's not industrial grade, and so they don't
17 want to use the same name.

18 So -- so they like to use the term "additive
19 manufacturing" which denotes the idea of making end-use
20 production parts.

21 Q. You said another professor in your department
22 had a 3D printer in 1994, right?

23 A. He was in a different -- he was in electrical
24 engineering, but adjacent department, yeah.

25 Q. Did that machine produce parts that were

1 specifically tailored to electrical engineering
2 applications?

3 A. No. I -- I have no idea what he bought it
4 for. He got a research grant and bought it. I actually
5 don't know what he was using it for, but then he left
6 the university, and I ended up inheriting his machine
7 after that. So I don't know what he was using it for,
8 frankly.

9 Q. Do you recall the make and model of that
10 machine?

11 A. Yes. It was a 3D Systems SLA 190. So 3D
12 Systems is the company, and the SLA 190 was the model.

13 Q. And what type of printing technology did it
14 employ?

15 A. That was a stereolithography machine.

16 Q. You said you purchased your first printer in
17 '96.

18 Which one was that?

19 A. That was a Sanders Prototype Model Maker II, I
20 think was the model. So Sanders Prototype was the
21 company, and then Model Maker was the make of the
22 printer.

23 Q. Is that a wax printer?

24 A. That's correct. Yep. Inkjet with molten wax.

25 Q. What kind of parts did you build on that?

1 A. That we printed -- I would definitely say that
2 was prototyping. It was bleeding edge at the time. But
3 the intent was to print wax parts that we could then use
4 with a -- an investment casting -- a separate
5 manufacturing process that would convert the wax parts
6 into metal parts.

7 Q. You were printing wax bolts; is that right?

8 A. Actually, printing the pattern and then the
9 ceramic shell goes around the wax part; and then when
10 you put that in a furnace, the wax melts and drains out,
11 and now you have a cavity, which is the ceramic bolt
12 that you just alluded to.

13 Q. At the time that you purchased that printer,
14 you had two printers, the wax one and the SLA 190?

15 A. The SLA 190 I inherited, I don't know, maybe
16 two -- roughly two years later. So as far as what I had
17 in my lab, the wax 3D printer came first, and then the
18 transfer of the machine from the adjacent lab came
19 second.

20 Q. And at that point in time, you had only two
21 printers in your lab?

22 A. At that point in time, probably it was in
23 the -- roughly the same time that I inherited the 3D
24 Systems machine, I bought some additional 3D printers.

25 Q. About how many 3D printers did you have then?

1 A. So in addition to the two that I just
2 mentioned, I -- the next wave that I purchased was two
3 more. So I had four -- four total at that point in time
4 in roughly 2000 -- roughly around the year 2000 or so.

5 Q. Were they all different technologies?

6 A. Yes, they were, actually.

7 Q. And why did you think you needed two more
8 printers?

9 A. I was -- I started teaching an intro to rapid
10 prototyping course at that time, and I was trying to --
11 basically I was building a -- what today I'll call an
12 edited manufacturing hub to do research and for students
13 to use. So I was trying to fill out some of the
14 different 3D printing processes.

15 Q. And you personally used each of these
16 printers, correct?

17 A. Yes, I did.

18 Q. Did you CAD up your own models to use with the
19 printers?

20 A. Yes, I did.

21 Q. Do you have a preferred modeling software?

22 A. At that time it was SolidWorks. I still use
23 SolidWorks sometimes today, but I more typically use
24 Fusion today. Back then it was SolidWorks.

25 Q. SolidWorks is my preference.

1 Why is Fusion preferable for you today?

2 A. One of the classes that I teach today does --
3 we work with medical models in which all curved
4 surfaces -- there's nothing flat or square, and Fusion
5 has sculpting or surfacing tools that are pretty decent
6 to work with that at least four years ago Stratasys
7 didn't have those. So that was the primary reason to
8 pivot at that time.

9 I -- I still occasionally use SolidWorks, so I
10 have nothing against it, just -- they are both good.

11 Q. You said four years ago Stratasys didn't have
12 those.

13 Did you mean SolidWorks?

14 A. Yes, I'm sorry. Solid -- 3D printing is on my
15 brain.

16 Q. Yeah. And to be clear, when you had those
17 four printers, that was in the 2000 timeframe more or
18 less?

19 A. Yes, give or take a year.

20 Q. You said you were teaching a course at that
21 time.

22 Do you remember which textbook you used?

23 A. For that course I didn't use a textbook. I
24 created my own content for the course. I don't recall
25 there -- I want to say there wasn't one. I just don't

1 recall there being a -- what I considered a suitable
2 textbook that early in the technology.

3 Q. What sources did you pull from to create your
4 course material?

5 A. Mostly personal experience from -- so it was a
6 combination of personal experience from using the
7 machines. Starting in 1996 actually through today, I've
8 been attending an annual research conference on this
9 technology in Austin, Texas, actually, every August.

10 So it was interacting with my own machines,
11 doing research and reading, you know, reading papers in
12 journal magazines -- I'm sorry, trade magazines. Things
13 like that.

14 Q. In that course, the students also personally
15 used the printers, I assume?

16 A. To the extent that it was practical. 3D
17 printers are not the fastest machines, so if you have a
18 class of 20 students and one machine, there are some
19 logistics problems.

20 So in a lot of cases, just practical reasons.
21 It would be demonstrations and then maybe a semester
22 project at the end where they would submit files that
23 got printed.

24 Q. It sounds like you might have had to form
25 teams to submit the files based on limited printer time;

1 is that right?

2 A. Possibly. So that -- that was 25 or so years
3 ago, and I don't remember what -- I don't remember if I
4 had team or individual projects back then, to be honest
5 with you. I don't remember if the projects were team
6 based or as individuals or completed as individuals that
7 long ago.

8 Q. You said the students submitted files to
9 print.

10 Did they give that to you, or did they send
11 those to the printer themselves?

12 A. Well, none of the printers were networked.
13 Everything was done at each of the printers at that
14 time.

15 The -- so that each of the printers had a PC
16 attached to it or a computer attached to it, and the
17 students would -- honestly, I don't -- I don't remember
18 what mechanism they brought their file to the -- to the
19 computer, but a storage device of something, whether it
20 was a -- what was it? Three-and-a-half-inch discs and
21 things like that that were -- that era's storage
22 vehicle, I guess.

23 Q. The computer that received the 3D files, did
24 that computer have slicing software on it?

25 A. Yes. In those cases, yes.

1 Q. Was it one computer for all four, or did each
2 machine have its own computer?

3 A. In that case, each -- each machine had a
4 dedicated computer that was -- came with the 3D printer,
5 actually.

6 Q. Do you recall if each computer for each
7 machine had different slicing software?

8 A. Yes. They were from three different -- I'm
9 sorry, four different manufacturers, and I -- yeah. At
10 that point in time, I -- you know, they all had their
11 own unique 3D slicing software, that is.

12 Q. Your recollection is that each computer had
13 slicing software that came from the printer
14 manufacturer?

15 A. At that time, yes. That was -- that's my
16 recollection.

17 Q. When you had those four 3D printers in 2000,
18 were they part of a -- what you would call a lab?

19 A. Yes. They were all in the same -- in the same
20 lab, and the lab was dedicated to 3D printing.

21 Q. Did the lab have a name?

22 A. I believe I just called it the Rapid
23 Prototyping Lab, if memory serves me correctly. Not
24 terribly ingenious, but accurate.

25 Q. And this was at NC State, right?

1 A. That's correct.

2 Q. What was the next 3D printing lab that you
3 worked in?

4 A. So I don't remember what year it was, but
5 we -- we were moved from one building to another, and so
6 we had to transfer everything into a new lab.

7 And I -- I think I just used the same -- at
8 the time of the initial move, I think I used the same
9 name, the Rapid Prototyping Lab. Right about the time I
10 was leaving -- so I don't remember -- I don't remember
11 when it started. There's -- renaming of the same lab to
12 be the current name is called CAMAL, and I'm obviously
13 no longer there. It's a colleague who runs that lab
14 now. CAMAL, C-A-M-A-L.

15 Q. Is that an acronym?

16 A. Yeah, it's an acronym. The AM is additive
17 manufacturing, the AL is and Logistics, and I don't
18 remember -- oh, C is center, sorry. Center for Additive
19 Manufacturing and Logistics.

20 Q. What justifies the logistics portion of that
21 name?

22 A. There was another faculty member who was in
23 logistics, and so I was not part of that naming. That's
24 an odd-couple pairing, if you ask me personally, but no
25 harm.

1 Q. It makes for a better acronym.

2 A. I guess so, yeah.

3 Q. Do you recall about what year that move
4 happened?

5 A. The move from one building to another probably
6 around 2005. In that neighborhood.

7 Q. And immediately after the move, there was
8 still only those four same printers, right?

9 A. No, we -- we had purchased -- and I'm saying
10 "we" because we added another faculty member in the same
11 research area as me.

12 We had -- for instance, I think in 2003, we
13 purchased an electron beam melting machine from a
14 Swedish company called Arcam, A-R-C-A-M.

15 We -- I'm trying to remember what year
16 MakerBot was formed and -- you know, so there is a
17 flood -- you know, in the late -- you know, the 2008
18 timeframes when there was a flood of new 3D printing
19 companies and technologies coming out. So we were
20 adding new machines, retiring machines that didn't work
21 anymore, and so on.

22 Q. 2008, was that upon the expiration of the
23 Stratasys patent?

24 A. The fundamental, the original -- the patent
25 from roughly 1988, that would have coincided, yes,

1 with when 3D printing took off quite a bit and when
2 Maker -- excuse me -- MakerBot was formed roughly that
3 time as well.

4 Q. The flood of new 3D printing machines referred
5 to, were those exclusive or focused on fused deposition
6 modeling machines?

7 A. I would say the majority were focused in that
8 specific year. The stereolithography patents also
9 expired at roughly that time. I think it took a
10 little -- a few extra years for companies making --
11 making versions of that process to come out as well.

12 But -- so in that 19- -- I'm sorry, in that
13 2008 timeframe, it was predominantly fused deposition
14 modeling, or today what we call "fused filament
15 fabrication," the generic name for the process.

16 Q. Do you recall which company held the
17 stereolithography patent?

18 A. That was 3D Systems.

19 Q. When you left NC State, was that 2009?

20 A. Yes.

21 Q. So that was during this wave of 3D printing
22 machines coming out?

23 A. Yeah, it was in that -- you know, that time of
24 very rapid change in the industry.

25 Q. That must have been pretty exciting.

1 A. Yeah.

2 Q. Do you recall how many printers the CAMAL Lab
3 had at the time of your departure?

4 A. It -- probably in the neighborhood of ten or
5 so.

6 Q. Of various technologies?

7 A. Yes.

8 Q. Did -- did you teach the course or courses at
9 the time that used the lab?

10 A. Yes. I continued to teach that -- I'm sorry,
11 rapid prototyping, I kept the name. I never changed the
12 name of the course to 3D printing, but it was an
13 introduction to rapid prototyping course.

14 Q. By that time in 2009, were you aware of rapid
15 prototyping textbooks that you or other professors used?

16 A. I'm sure there were -- well, it's certainly
17 possible that there were. I had enough content, you
18 know, home-built or self-developed content that to this
19 day I don't use a textbook for any of the additive
20 manufacturing courses. I use everything that I
21 developed myself for those courses.

22 Q. Today are you aware of any particular
23 textbooks that are out there that others might be using?

24 A. I -- so I'm aware of some textbooks, and, I
25 mean, I have a book shelf over there that has some of

1 these books.

2 I do not -- I've never asked any colleagues at
3 other universities which books they are using, so I
4 guess there are books out there. I don't know who is
5 using them or to what extent they are used in the
6 classroom though.

7 Q. Did you have a specific role attached to the
8 CAMAL Lab?

9 A. So we -- we didn't have self -- we didn't have
10 titles, but I found at the lab -- you know, when I
11 bought that first 3D printer in 1996 and my department
12 gave me lab space and started adding -- adding new
13 equipment, and then I think it was -- I'm sorry, 2001 or
14 so I was fortunate enough to hire a colleague, Ola
15 Harrysson, O-L-A, not Hola, Harrysson,
16 H-A-R-R-Y-S-S-O-N, I think.

17 And so I -- so I directed the aerospace side
18 of the lab, and he -- he took over the biomedical side
19 of the lab.

20 Q. In 2009, do you recall if any of the printers
21 in the CAMAL Lab were networked?

22 A. So I -- I do not have -- I do not believe that
23 we were using networking at that time with any of them.
24 I could not tell you whether -- yes or no, I couldn't
25 tell you whether or not any of them were network

1 capable. I can say that we were not using networking at
2 that point in time.

3 Q. How did you or students get print files to the
4 printers if they weren't networked?

5 A. The old fashioned way that I described
6 earlier, that it was -- if it wasn't modeled in
7 SolidWorks or any other software package, if it wasn't
8 modeled at that 3D printer machine, more typically it
9 was modeled somewhere else.

10 And then the person who wanted something 3D
11 printed would bring a memory device -- a memory device
12 and plug it into the computer at the machine and slice
13 it at the machine and then execute the slice job.

14 Q. Did each of the printers at that time have
15 their own proprietary slicing software?

16 A. To the best of my recollection, at that point
17 in time it was still proprietary. I don't recall --
18 certainly none of the printers that we were using at
19 that date were -- were using -- let's say open source
20 slicers that are prevalent today.

21 Q. You moved to the Rochester Institute of
22 Technology, RIT, in 2009?

23 A. Yes, that's correct.

24 Q. And you're still there today?

25 A. That's correct.

1 Q. When you got there in 2009, did they already
2 have 3D printers?

3 A. Believe it or not, no. There wasn't a single
4 3D printer in the College of Engineering when I started
5 here.

6 Q. Did you purchase their first one?

7 A. Yes, I did.

8 Q. Which was that?

9 A. Let's see. I don't recall what order. So I
10 purchased several machines roughly around the same time,
11 so there was -- there were two machines -- well, two of
12 them were Stratasys. One of them was the inkjet
13 process, and one of them was the fused deposition
14 modeling.

15 I purchased the MakerBot printers around that
16 time. Honestly, I've bought so many machines since I've
17 been here, it's a -- the chronological timeline is a
18 little bit of a blur, you know, in terms of answering
19 your question and, you know, what did I purchase up
20 front in roughly 2009 after I arrived.

21 MR. KAPADIA: Counsel, we've been going for a
22 little over an hour. Is now a good time for a break?

23 MR. VINCENT: I thought the same. Let's do
24 that.

25 Ten minutes?

1 MR. KAPADIA: Okay. Sure.

2 (Recess.)

3 BY MR. VINCENT:

4 Q. You mentioned purchasing the first couple
5 printers that RIT had; is that right?

6 A. That we used in the College of Engineering,
7 yes. I won't speak to the rest of campus, but I -- I
8 don't know if anyone else on campus had 3D printers at
9 that time.

10 Q. The printers that you purchased in that
11 initial tranche were a couple Stratasys printers and a
12 MakerBot printer; is that right?

13 A. That -- that's not all of them, but those were
14 examples. There was a -- jeez, what -- what was it
15 called? It's a company that's out of business now, a
16 binder jetting process. I had multiple binder jetting
17 machines that -- those were early on as well.

18 Q. Were these all within your first year at RIT?

19 A. In the first two or three years.

20 Q. Was it in connection with a specific grant?

21 A. No. Part of it -- when -- when you get hired,
22 they have what's called a startup package, which is --
23 you know, you tell them, this is what you want -- this
24 is what I would like to do if I come, and they provide
25 you with some financial resources to get things going,

1 and so that was with my startup package.

2 And I also had an endowed professorship that
3 provided some funds as well. And then by the end of my
4 first year, I had researched -- new research grants
5 here, some of which purchased equipment as well.

6 Q. What was your pitch for -- if you were
7 selected -- what you would do and how you would use
8 these machines?

9 A. So the primary pitch at that time was the
10 Rochester area has a lot of document printing companies,
11 Kodak and Xerox here in Rochester.

12 And the document printing company -- I'm
13 sorry, the document printing industry has been in
14 decline, but most of those companies are trying -- have
15 been, over the past decade and change, have been trying
16 to get into the 3D printing world.

17 And so that was one of the reasons that I was
18 interested in Rochester specifically was there were
19 companies that had these printing technologies that I
20 was interested in seeing how they could be applied or
21 adapted to produce new 3D printing processes.

22 Q. Did you model your initial printer purchases
23 off of the types of printers that Kodak and Xerox and
24 other businesses in the region used?

25 A. Not initially. So the -- the initial thing

1 was just I need to get basic capabilities here so that I
2 can teach the classes that they asked me to teach at the
3 time. So that was the primary focus was getting those
4 basic processes in place.

5 And -- and then for subsequent purchases,
6 those were more research oriented, including some -- you
7 know, within the last ten years working with Xerox
8 primarily on a new -- development of a new metal 3D
9 printing technology.

10 Q. It sounds like the printers you selected
11 initially were across diverse technologies?

12 A. Yes. And that was by design.

13 Q. That was to give your students exposure to
14 different technologies that they might see in the
15 industry later on?

16 A. Yes. And -- and to support the class that I
17 was teaching, which is preparation for what you just
18 said at careers and industry.

19 Q. Are you aware of the types of printers that
20 Kodak was using in 2009?

21 A. I don't know what they -- well, actually, I
22 take that back. I just -- so they had a subsidiary that
23 technically was part of Kodak, and so that was their
24 3D -- well, they also called it rapid prototyping. It
25 was their rapid prototyping arm.

1 They had selective laser centering and
2 stereolithography machines, if memory serves me
3 correctly, in that facility.

4 Q. Did you ever tour that facility?

5 A. Yes, I did.

6 Q. Around 2009?

7 A. It would have been with -- not -- not that
8 early, but it -- within the first five or six years, I
9 think.

10 Q. About how many printers did Kodak have at the
11 time of that tour?

12 A. I didn't see the whole facility. I can tell
13 you the area that I was walking through, maybe five or
14 six. Maybe not that -- four to six, I'll say.

15 Q. Did you see them engage in a build?

16 A. I -- that was long enough ago, I don't recall
17 if any of them were actually printing anything at that
18 point in time, or points in time. I think I went there
19 twice.

20 Q. How were those trips to Kodak arranged?

21 A. I -- so truth be told, I don't remember
22 what -- so -- so those are instances where somebody
23 reached out to me and said -- wanted to meet about
24 something, but I -- I don't recall what it was they were
25 interested in talking about, honestly.

1 We never did a research collaboration, like a
2 funded research grant. I never asked them to print
3 anything. So I honestly don't remember why they
4 initiated whatever the discussion was on those two
5 occasions.

6 Q. Sounds like these are more casual connections
7 but not partnerships with Kodak at that time?

8 A. That's -- that specific instance, that's
9 correct. Yeah.

10 Q. Did you ever partner with Kodak later?

11 A. Not directly. So indirectly. So there's a
12 company, Evolve -- sorry, that took me a minute to get
13 to the name -- Evolve Additive, that started making a 3D
14 printing process that uses electrophotography as the
15 printing process, which is the same print engine that's
16 used in a lot of copy machines, including Kodak's copy
17 machines.

18 And so Evolve Additive decided to use Kodak's
19 print engine that's made here in Rochester. And then
20 Evolve opened up an R&D facility a couple miles away
21 from here.

22 So I didn't do any funded research with them,
23 but I visited them numerous times. So that's not
24 directly with Kodak but in a roundabout sort of way with
25 their print engine.

1 Q. You said you didn't do any funded research.
2 Did you do any work or consulting for them?

3 A. No -- let me see. No consulting, no funded
4 research. I can say many dozens of conversations that
5 were informal exchanging of technical ideas and things
6 like that.

7 Q. And what time period are we talking about
8 here?

9 A. This was more -- more like the late teens,
10 early 20s. So, you know, getting close to that time
11 where COVID -- you know, the time space continuum got
12 warped with COVID and we can't remember years.

13 But let's say 19- -- I'm sorry, 2018 to 2022
14 was when some of the -- yeah, a lot of these technical
15 brainstorming and just trading ideas and things like
16 that happened.

17 Q. You mentioned that either you or RIT have
18 partnered with Xerox; is that right?

19 A. That's correct.

20 Q. Is it you personally or is it through RIT?

21 A. Oh, I'm sorry. It's me in connection with my
22 role as a professor. So me representing RIT, if that
23 makes sense.

24 Q. And what work did you do with Xerox and when?

25 A. So let's see. It would have been -- so

1 Xerox -- the scenario that I described a few minutes
2 ago, Xerox, like many companies, was interested in
3 exploring ways that they might be able to enter the
4 additive manufacturing industry.

5 And so they asked me to -- well, it was more a
6 matter of them bouncing ideas off of me and saying, you
7 know, "What do you think about this technology? What do
8 you think about that technology? Do you have any
9 ideas?"

10 You know, in a nutshell they were trying not
11 to duplicate the same mold that everybody else was
12 doing.

13 And so those discussions were not funded.
14 Those were just informal and no consulting arrangement
15 or anything. It was just I knew people over there, and
16 I would go over there for meetings, and we would
17 brainstorm, and I would give them my two cents' worth.

18 Then after that it was -- it would have been
19 around 2021, I -- either '21 or '22, Xerox acquired a
20 startup company called Vader Systems, and I had -- I had
21 a Vader Systems machine in the lab and had been the
22 first person working with that process. It was a small
23 father/son startup company.

24 So Xerox acquired them. And then once -- and
25 that business got moved from Buffalo to here in

1 Rochester, and then Xerox funded research collaborations
2 with my -- with me and my lab to help develop that
3 process or aspects of the process.

4 Q. Okay. It sounds like that was more
5 fundamental research into developing a new process
6 rather than commercializing it?

7 A. That's -- that's a fair statement, yes.

8 Q. And remind me, when was your first interaction
9 with Xerox?

10 A. That's hard to say. So I -- I'm saying it
11 probably would have been maybe 2012-ish was the first
12 informal -- you know, it was just me going out trying to
13 meet folks, the normal thing. Just making connections
14 with companies and networking and getting to know
15 people. So it was that sort of thing roughly in the
16 2012 timeframe.

17 They were not -- to the best of my knowledge,
18 they were not -- I wasn't aware of them doing any --
19 exploring anything in the additive manufacturing space
20 that early. It's entirely possible there were things
21 that they were working on, but I wasn't privy to them if
22 they were.

23 Q. Back to the lab that you founded around 2009,
24 did it have a name?

25 A. So I didn't create or I didn't call it a new

1 name. So the lab space that I was originally given was
2 in a preexisting lab called the Brinkman Lab. It was
3 2015 when I created a new center called the AMPrint
4 Center, which is A-M-P-R-I-N-T. The AM standing for
5 additive manufacturing.

6 So that was 2015 when that lab was created,
7 and I was -- there was new building construction, and
8 that's the space that I'm in now.

9 Q. Why was the AMPrint Center created if the
10 Brinkman Lab already existed?

11 A. So the -- there's -- most universities that
12 use the word "center," that is a formal organizational
13 unit within the university. And so that was the
14 creation of a formal organizational unit under the vice
15 president for research office.

16 I also, at the same time -- what funded that
17 creation of that center was a very large tenure grant
18 proposal that I had submitted to New York State to fund
19 the creation of this center.

20 And so universities, if you bring in enough
21 dollars, they formally create a center, and it -- you
22 know, it has a reporting structure and so on.

23 So there wasn't enough space in the Brinkman
24 Lab, and they had a new building constructed with
25 undedicated space in that building, which they allocated

1 to the -- to the new research center.

2 Q. Would you say that the goals of the Brinkman
3 Lab were similar to what the AMPrint Center is for, or
4 is the print center a whole new thing?

5 A. No. It -- everything has been consistent all
6 along.

7 I mean, my personal interest is in
8 developing -- we'll call it next generation additive
9 technologies. And I -- you know, that was in place when
10 I started here in 2009.

11 The 2015 was simply a structural thing within
12 the university of making a -- you know, a formal
13 structure and identifying it and reporting structures
14 and lots and lots of paperwork.

15 Q. So it's fair to say that the print center was
16 christened with fanfare because there's a lot of
17 funding, but the research and work is very similar to
18 what you were already doing at the Brinkman Lab?

19 A. Yes. It was a continuation.

20 Q. Going back to the Brinkman Lab, were you
21 involved in physically setting up and installing any of
22 the printers?

23 A. Typically -- so yes and no. So the -- a
24 MakerBot printer, for instance, you just buy it -- or
25 I'm sorry, at that time, a MakerBot printer, you would

1 purchase it. It shows up in a box, and you uncrate it,
2 and you do it yourself.

3 The more professional grade machines, somebody
4 would come and do the installation for you.

5 Q. Like having a refrigerator installed?

6 A. Yeah, kind of. Yeah.

7 Q. And were you there for both types of
8 installation, the more consumer grade MakerBot and the
9 industrial?

10 A. Yes.

11 Q. All right. Did the Brinkman Lab have IT
12 information technology support services?

13 A. The College of Engineering had IT support that
14 covered or compassed that lab, yes. There was nobody
15 dedicated to the lab, but just the college had IT
16 support.

17 Q. Was the college's IT involved in setting up
18 any of the printers in the lab?

19 A. The -- so I don't recall any -- you're talking
20 about the initial in 2009; is that correct?

21 Q. Right.

22 A. At that point I don't recall any IT support.
23 I won't swear that there wasn't any involved, but I
24 don't recall needing any at that time point.

25 Q. Was there a later time point that the lab grew

1 such that you needed IT support?

2 A. Only -- so I think the -- so there was a point
3 in time where -- a little bit of background here.

4 Every university is different. Our IT at this
5 point in time does not like 3D printers on the network,
6 for example, because of cybersecurity concerns.

7 Earlier -- so I think the Stratasys J750, the
8 inkjet printer, was at least connected to a network.
9 And so the -- the only involvement of IT would have been
10 activating an Ethernet port for it to plug into.

11 Q. And to clarify, you said that currently today
12 IT is resistant to any 3D printers on their network,
13 right?

14 A. As a general rule, yes. They -- so I can say
15 there have been ransomware attacks and things like that,
16 so they have reasons to --

17 Q. Okay.

18 A. -- reasons to be conservative.

19 Q. Ransomware through 3D printers specifically as
20 a vector?

21 A. One of them. Yeah. I've had one metal
22 additive manufacturing machine that's been attacked
23 twice. Two ransomware attacks.

24 Q. But back in the 2009 to 2014 timeframe, IT
25 wasn't concerned about that?

1 A. I will -- I couldn't -- I'll just say I don't
2 know to what extent. I assume they've always had
3 concerns about cybersecurity as a general rule. Nobody
4 ever said -- I don't recall anyone suggesting 3D
5 printers being a specific vulnerability at that point in
6 time. That's maybe a better way to phrase it.

7 (Court reporter requested clarification.)

8 THE WITNESS: I'm sorry for having to wear
9 these headphones. My speaker died on me. So...

10 BY MR. VINCENT:

11 Q. You said the Stratasys J750 was networked via
12 Ethernet?

13 A. That's -- that's my recollection, yes.

14 Q. What kind of technology did that printer use?

15 A. It's -- the category is called material
16 jetting, and it's -- specifically it uses inkjet
17 printheads to jet droplets of liquid plastic that they
18 get hardened after they land.

19 Q. What year did you install that?

20 A. It was either 2014 or 2015. So the AMPrint
21 Center was created in the fall of 2015, and that machine
22 came just before the center was opened. So I would
23 guess that it was early 2015 is -- is my best estimate.

24 Q. And did you print on that printer by accessing
25 it via the network?

1 A. At -- not when I bought it. I can say that I
2 have done it since then in that -- you know, this would
3 have been maybe 20- -- 2020 to 2022-ish. Maybe in that
4 timeframe.

5 My -- my PC at the time -- I never asked ITS
6 to connect my PC to that device on the Internet until
7 quite a few years later.

8 Q. What software on your device do you use to
9 access the J750?

10 A. So I'm not using that machine anymore, but at
11 the time -- well, most recently it's called GrabCAD
12 software. I believe, yes, there -- there was a
13 different software package whose name escapes me right
14 when I first bought the machine. I'm almost certain it
15 was -- GrabCAD was a more recent software for that
16 machine. It wasn't the original software, I don't
17 believe.

18 Q. What does GrabCAD do?

19 A. GrabCAD - in the context of that machine,
20 GrabCAD will take a model that you want 3D printed,
21 typically in the STL file format, and then it slices it
22 into the 3D printer representation and sends to it the
23 machine for printing.

24 Q. You said it slices the file; is that right?

25 A. That's correct.

1 Q. Is that like a -- a translation step?

2 A. Yes. It's a step that -- so the sliced file
3 that you would send to the printer for execution on the
4 printer is -- well, almost all 3D printers print one
5 layer of material on top of another.

6 And so the term "slice" refers to generating
7 the printing instructions to produce each of those
8 individual layers in sequence. And so that's the
9 process of what a slicer does.

10 Q. And is that something that is specific to the
11 J750?

12 A. No. 3D printers, in general, use slicers to
13 prepare the files for printing.

14 Q. When -- when did slicing for 3D printers first
15 come out?

16 MR. KAPADIA: I'll object to the scope of the
17 question.

18 THE WITNESS: So some -- I'm sorry, was
19 there -- did somebody just say something?

20 Mr. Kapadia?

21 BY MR. VINCENT:

22 Q. You can answer.

23 A. Okay. Sorry. So the -- I don't know if they
24 called it slicing. I think they did, but I don't know
25 if they called it slicing, but the very first 3D

1 printers in the late 1980s printed in the same method,
2 layer-by-layer method, that 3D printers do today. And
3 so there was software that prepared the slice files back
4 then.

5 Q. Did you use any of those back in the day?

6 MR. KAPADIA: Same objection. Scope.

7 I don't believe there's anything being asked
8 here specific to Dr. Cormier's declaration, which I'll
9 add is the subject matter of this deposition.

10 BY MR. VINCENT:

11 Q. You can answer.

12 A. Okay. Is there a specific location in my
13 declaration that you're alluding to that -- that you
14 want to ask me about?

15 Q. Yes. I'm curious about your background and
16 familiarity with slicing software.

17 MR. KAPADIA: Was that a question, Counsel?

18 BY MR. VINCENT:

19 Q. What is your familiarity with slicing
20 software?

21 MR. KAPADIA: Same objection to the scope.
22 Beyond the scope of the declaration.

23 THE WITNESS: Okay. So is there a mention of
24 slicing in my declaration that you want me to comment
25 on?

1 BY MR. VINCENT:

2 Q. I don't recall if it's in there.

3 Do you know if you've talked about slicing
4 software?

5 A. Here, I'll do a -- okay. I just did a search
6 in my declaration. So it -- it mentions, for example,
7 that Hamilton does not discuss slicing or G-code.

8 Q. Is your opinion that Hamilton does not discuss
9 slicing or G-code based on your expert familiarity with
10 what slicing in G-code is, right?

11 A. So, yes, I'm familiar with slicing and G-code.

12 Q. How are you familiar with it?

13 A. Because I've used them.

14 Q. When?

15 A. With the very first 3D printer that I
16 purchased, which I believe was 1996.

17 Q. And that printer used a slicer?

18 A. Yes, it did.

19 Q. That printer used G-code?

20 A. That specific printer did not. Well, and I'm
21 sorry, let me be more accurate.

22 The -- in the same way that there are file
23 formats for documents, you might have a Word file or a
24 PDF file, 3D printers -- the -- the filament, the term
25 "3D" -- I'm sorry, the term "G-code" that's in my

1 declaration refers to the 3D printer file format that is
2 most commonly used today for filament extrusion 3D
3 printers.

4 The 3D printer -- the very first 3D printer
5 that I purchased was an inkjet 3D printer which used a
6 different file format.

7 I hope that answers the question.

8 Q. It does. It used a different file format, but
9 it still went through a slicing operation?

10 A. Correct.

11 Q. Looking at the J750, what other 3D printers in
12 the Brinkman Lab were networked?

13 A. I -- let's see. And, I'm sorry, you're
14 talking about in the 2009, 2010 timeframe or -- or
15 later?

16 Q. Like, say, 2009 to 2014.

17 A. So I don't -- I don't believe the J750 was
18 in -- I think it was early 2015, as I said earlier. Let
19 me think about other -- I don't recall any of the 3D
20 printers that were in the lab in the timeframe that you
21 just described being networked. I'm pretty sure none of
22 them were networked.

23 And I won't swear that -- I won't swear that
24 anything where -- I'm reasonably certain that none of
25 the ones that I had in the lab at that point in time

1 were networked.

2 Q. They weren't networked. Did you send print
3 files to the printers via the method we discussed
4 earlier, floppy drive, USB stick, et cetera?

5 A. At that point in time, yes. That was -- that
6 was the typical method for getting a file onto the 3D
7 printing system.

8 Q. Tell me how you would get a -- for example,
9 MakerBot printer to print a file.

10 A. So -- and just so I'm clear, you're talking
11 about the preparation process up to the point of
12 starting the print or actually starting the print? I
13 just want to know what the -- how far to go back.

14 Q. No. Great question.

15 Let's start at the idea. Before there's even
16 a model, someone has an idea.

17 What are the -- what are the steps necessary
18 to take that idea and end up with a part?

19 A. And -- and I'm sorry to keep asking
20 clarifications, but just so I'm answering correctly,
21 you're talking about a MakerBot back at that point in
22 time in that, let's say, 2009, 2010-or-so timeframe when
23 I had purchased those first machines? Is that accurate?

24 Q. Yes. You had a MakerBot printer in your
25 Brinkman Lab around 2009 or '10; is that right?

1 A. In that approximate timeframe, yes.

2 Q. What did one have to do to take an idea for a
3 print to get that ultimately printed on that MakerBot
4 machine in your lab?

5 A. Okay. So for that scenario that you're
6 describing, we -- so the idea of printing something
7 assumes that you already have a CAD, computer-aided
8 design, model generated of the thing you want to print.

9 And so on a computer that has the slicing
10 software compatible with that printer, you would run the
11 mod -- the geometry model would be imported into the
12 slicer software. The slicer software would slice it
13 into the individual layers.

14 And then in our case, we would have that
15 output file saved on a memory device which today,
16 analogous to a USB memory stick; and then we would
17 transfer that to the printer, the controller on the
18 printer, and then tell the printer to print the part.
19 Or print that file, I should say.

20 Q. Are you familiar with other ways of sending
21 print files to printers during that time -- same
22 timeframe such as over a network?

23 A. Well -- I'm sorry. So networks existed at
24 that time -- I -- I couldn't tell you exactly what date
25 network interface cards started appearing because a

1 whole lot happened right in that timeframe that you're
2 alluding to, so it's kind of hard to pinpoint dates,
3 unfortunately, without, you know, diving in and
4 examining specific 3D printers, which I haven't done.

5 Q. That's fair.

6 A. I'm sorry.

7 Q. Let me make it a little more relaxed.

8 A. Sure.

9 Q. Sometime prior to 2014, or in 2014, it's safe
10 to say there were 3D printers with networking
11 capabilities, right?

12 MR. KAPADIA: Objection to form.

13 THE WITNESS: I -- I -- the answer is I don't
14 know. Like I just said, I don't know when the timeline
15 was for -- for when it -- when it became a thing. It --
16 as I said a moment ago, things were happening really
17 fast right in that timeframe that you're alluding to,
18 and so I couldn't tell you which year specifically they
19 all of a sudden -- you know, that became a thing. So
20 it -- it -- I don't know the answer, I'm sorry, is the
21 short answer.

22 BY MR. VINCENT:

23 Q. That's fine.

24 You did say the Stratasys J750 was network
25 capable, and that was in your lab in probably early

1 2015?

2 A. That's approximately the date, yes, when it
3 came in. And, yes, it was network capable.

4 Q. Do you believe it was the first
5 network-capable 3D printer?

6 A. I don't know.

7 Q. Is it possible there were 3D printers before
8 the Stratasys J750 that were network capable in 2014?

9 MR. KAPADIA: Objection to form.

10 THE WITNESS: I -- it's possible. I just
11 don't know if the answer is yes or no.

12 BY MR. VINCENT:

13 Q. Do you know what a print farm is?

14 A. The current term -- well, as it's currently
15 used, a print farm is often used to describe a -- in
16 many cases it's company or let's just say a facility in
17 general terms that has a whole lot of 3D printers --
18 excuse me -- and -- and people will send jobs to a,
19 quote/unquote, print farm.

20 And the intention is for printing
21 high-throughput printing, 3D printing specifically, of
22 parts. In a lot of cases it's the same kind of 3D
23 printer. I guess it doesn't have to be exclusively
24 that.

25 Q. Have you ever personally seen a print farm?

1 A. Nothing that I will -- well, let me think. I
2 guess nothing that I would describe as a print farm, but
3 I'll -- the term "print farm," today at least, is often
4 used to describe very low-cost 3D printers, you know,
5 large numbers of low-cost 3D printers.

6 I have certainly been in service bureaus that
7 have a lot of 3D printers; but, you know, they -- they
8 tend to be -- you don't think of them as print farms
9 per se.

10 Q. Which service bureaus are you thinking of?

11 A. Incodema, I-N-C-O-D-E-M-A, would be one
12 example that's an hour -- hour and 15 minutes or so away
13 from where I am.

14 Q. And what do they do at Incodema?

15 A. They make -- my recollection is it's
16 exclusively metal parts and -- so they have laser powder
17 bed fusion machines; for the most part, making aerospace
18 components, metallic aerospace components.

19 Q. Do you know when Incodema started?

20 A. That, I do not.

21 Q. If I told you it was in 2001, would that sound
22 plausible?

23 A. It's possible, yeah. I just have no -- I have
24 no idea when it was, but it's certainly possible.

25 Q. And they're in Ithaca, New York?

1 A. That's correct.

2 Q. Did you personally tour Incodema's facility?

3 A. I have once before, yes.

4 Q. When was that?

5 A. Roughly 2020. Maybe five years ago.

6 Q. Were there any other businesses or service
7 bureaus like Incodema that you have personal knowledge
8 of?

9 A. Yeah. I mean, there are service bureaus all
10 over the country. It's not called Fineline Prototyping
11 anymore, but there was -- whenever their new name is,
12 there's a company in Raleigh where I used to live called
13 Fineline Prototyping. Again, whatever the new name is
14 now, that's an example of one.

15 There was -- Harvest Technologies is there in
16 Texas outside of Austin. Actually, I'm sorry, Harvest
17 is not -- I'm getting my service bureaus mixed up.
18 Anyway, there is a service bureau just outside of Austin
19 there. Yeah, so those are some examples.

20 Q. And when you use the phrase "service bureau,"
21 what do you mean by that?

22 A. So service bureau is a company that -- in the
23 context of what we're talking about today, a service
24 bureau is a company that -- you can think of it as
25 contract manufacturing that makes parts -- specific

1 parts for customers, and then they ship the part out to
2 the customer.

3 Q. Are you aware of any service bureaus that were
4 in existence before you launched the AMPrint Center?

5 A. Yes.

6 Q. Which ones?

7 A. Fineline Prototyping, whatever the new name
8 is. Again, that was an example of a service bureau that
9 existed before 2015.

10 Q. Did you tour Fineline before 2015?

11 A. Yes, I did.

12 Q. And what were the circumstances of your tour
13 of that facility?

14 THE WITNESS: I don't recall how we made the
15 initial connection, but they were in Raleigh. North
16 Carolina State University is in Raleigh where I was a
17 professor, and somehow -- I don't remember the
18 circumstances -- I got to know the owner of the company,
19 and he invited me out for a tour, and I would
20 periodically visit them, say hello.

21 BY MR. VINCENT:

22 Q. Who was the owner?

23 A. At that time -- he's retired. He sold the
24 company. But at that time his name was Rob Connelly.

25 Q. Did Fineline specialize in any particular 3D

1 printing technology?

2 A. Yes, they did. Stereolithography exclusively
3 at that time.

4 Q. How many machines did they have?

5 A. I'm guessing here. At that time, three, maybe
6 four.

7 Q. That --

8 A. Best estimate, yeah.

9 Q. Did you see any of them in action?

10 A. In all -- in all likelihood I did. I
11 couldn't -- I couldn't point to a specific memory in my
12 brain, but in all likelihood I did.

13 Q. Do you know if those machines were networked?

14 A. I do not.

15 Q. Can you think of any other service bureaus
16 that were in existence before the launch of the AMPrint
17 Center?

18 A. So Harvest Technologies that I mentioned --
19 this will grate on me for the rest of the day. I can't
20 remember the name of the service bureau that's right
21 outside of Austin there. I'm just drawing a blank on
22 the name of that one.

23 The -- yeah, so Harvest and Incodema are two
24 examples that did exist before the AMPrint Center was
25 established.

1 Q. Did Protolabs?

2 A. Yes, Protolabs -- and I'm sorry, Protolabs
3 refers to the Fineline acquisition, not to the Harvest
4 but Fineline. So you are correct, Fineline is now a
5 part of Protolabs.

6 Q. Do you know if the printers at Harvest were
7 networked before 2015?

8 A. I do not. I never visited Harvest. I just --
9 I -- I know folks in social circles just from trade
10 shows and things like that, so I -- I've seen their
11 booth at trade shows. But I do not know if they were
12 networked or not.

13 Q. Do you know what doctor a Dr. Bruce Kahn?

14 A. I do.

15 Q. Who is he?

16 A. He -- he's retired now. He used to work for
17 me here in the AMPrint Center. He was a research
18 scientist here in the AMPrint Center. In the very
19 beginning of his career, he worked at Kodak. He's an
20 ink chemist by training.

21 Q. Did he work in the Brinkman Lab?

22 A. He worked -- so he -- I hired him after the
23 AMPrint Center was established in 2015. So his title
24 was director of business development.

25 Q. Are you familiar with a Dr. Bruce Evans?

1 A. Bruce Evans, I do not know him per se.

2 Q. Sorry. Dr. Brian Evans?

3 A. Brian Evans, I do not know him, no.

4 Q. Do you know of a Jonathan Dummer?

5 A. The name rings a bell, but I can say I don't
6 know him personally.

7 Q. I understand Jonathan Dummer developed the
8 KISSlicer software.

9 Are you familiar with that?

10 A. That sounds familiar. That's where I -- the
11 name sounds familiar. So, yes, I've never used
12 KISSlicer, but I am familiar with the software.

13 Q. Have you ever met Mr. Dummer?

14 A. I have not.

15 Q. When did you --

16 A. At least I don't have a -- I've met a lot of
17 people. I don't have a specific recollection of ever
18 meeting him.

19 Q. When did you first -- when were you first
20 introduced to the KISSlicer software?

21 A. So like I said, I've never personally used
22 that software package. I've heard the name KISSlicer,
23 and I knew -- I knew that it was a slicer for filament
24 extrusion processes. I didn't read any specific
25 documents about it until, I mean, roughly a year ago.

1 In that ballpark. It wasn't prior to any involvement in
2 this litigation.

3 Q. And KISSlicer is a third-party software that
4 can be used with different types of printers?

5 A. That is my understanding, yes.

6 Q. And this contrasts from the early days where
7 printers came with their own proprietary slicers?

8 A. That's a fair characterization, yes.

9 Q. Do you know of anyone else who has used
10 KISSlicer before?

11 A. I do not. I've never had it installed in my
12 lab, and I -- I'm at a loss to even think of anybody I
13 know specifically who was using KISSlicer.

14 Q. Do you know if KISSlicer is still in use
15 today?

16 A. I don't know of anybody using it today. It's
17 entirely possible that it is still in use today, but
18 I -- I don't know of anybody using it today.

19 MR. VINCENT: Take a ten-minute break.

20 MR. KAPADIA: Okay. Counsel, I think it's
21 noontime Eastern.

22 Do we want to do a lunch break for the
23 witness?

24 THE WITNESS: Yeah, I -- I'm an extreme early
25 bird, and so I had breakfast at 3:30 this morning. But

1 if Mr. -- Mr. Vincent, if you're close to a logical
2 stopping point, I'm fine going a little bit longer, then
3 perhaps taking a long enough break to eat a quick bite.
4 But it's up to you.

5 MR. VINCENT: I'll -- I'll let you know. I'm
6 very close to being done. So let's take five --

7 THE WITNESS: Okay.

8 MR. VINCENT: And we'll -- we're going to
9 finish the depo before your lunch. So you won't have to
10 come back.

11 THE WITNESS: Okay. Fair enough then. Five
12 minutes is fine. Thanks.

13 (Recess.)

14 BY MR. VINCENT:

15 Q. Dr. Cormier, do you understand what it means
16 to construe a claim?

17 A. Basically how you would interpret the claim or
18 understand what it means.

19 Q. And what did you consider when analyzing the
20 words of the claim in this patent?

21 A. The -- are you asking about the plain and
22 ordinary meaning?

23 Q. How did you determine how to interpret the
24 claims of --

25 (Reporter requested clarification.)

1 BY MR. VINCENT:

2 Q. How did you determine how to interpret the
3 claims of this patent?

4 A. I -- so as described in my declaration, there
5 are the -- there are the standards for -- I'm sorry,
6 legal standards for claim construction.

7 Q. Are these standards that were provided to you
8 by Patent Owner's counsel?

9 A. I have seen them before I have -- the
10 standards that are in this declaration came from
11 counsel, yes.

12 Q. Are these the standards that you followed when
13 interpreting the claims?

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

15 Q. Did you specifically review the paragraphs in
16 which this legal standard is set out when interpreting
17 the claims?

18 A. You're asking me if I read that -- if I read
19 the language and then -- and then applied that to the
20 best of my ability in the discussion? Is that
21 essentially the question?

22 Q. Correct.

23 A. Yes, I did read through that language and did
24 my best to -- to apply those principles.

25 Q. Can you turn to paragraph 49 of your

1 declaration?

2 A. Yes. Okay. I'm there.

3 Q. The last sentence says, "This reference point
4 prevents a person of ordinary skill from using hindsight
5 in deciding whether a claim is obvious."

6 Do you see that?

7 A. I do.

8 Q. And you're criticizing the petition for
9 engaging in hindsight, correct?

10 A. There are -- there are points in the -- I do
11 use that term in the declaration where there are points
12 when it seemed like that was the case.

13 Q. And what do you mean by "engaging in
14 hindsight"?

15 A. So this is hard to -- how would I describe
16 that? So after the fact, seeing something and then --
17 and then looking backwards and -- and saying, okay, well
18 now -- as of today I can look back and see, well,
19 somebody might have done such and such. That would be,
20 I guess, hard to define it in the context here, but --
21 or giving an example, but that's -- that's how I would
22 describe it.

23 Q. And it's your understanding that this is
24 legally impermissible, correct?

25 A. So that is my understanding that -- well, you

1 can't use hindsight to fill in blanks, I guess, maybe is
2 a way to describe that.

3 Q. Turn to paragraph 91, please.

4 A. Okay. Okay. I'm there.

5 Q. Do you see in the middle you say,
6 "Petitioner's rationales lack any supporting evidence
7 and thus are guided by impermissible hindsight"?

8 A. I do.

9 Q. Do you mean to suggest here that hindsight may
10 sometimes actually be permissible?

11 A. No, that's not what I'm saying there. If
12 they -- I sorry, "they" -- in this case, the Petitioner.
13 If there was supporting evidence provided that
14 essentially says, okay, there is evidence here, I'm not
15 looking backwards, and if -- so if they had provided
16 supporting evidence for the things that are listed above
17 that in that paragraph, then we wouldn't be talking
18 about hindsight.

19 Q. Are there any circumstances in which using
20 hindsight is permissible?

21 MR. KAPADIA: Objection. Calls for a legal
22 conclusion.

23 THE WITNESS: Yeah, unfortunately, I'm -- so
24 I -- I don't have any legal experience to give an answer
25 to that specific question.

1 BY MR. VINCENT:

2 Q. Do you think it's important to know the answer
3 to that question to conduct the analysis in your
4 declaration?

5 A. As I said earlier, I was using the previous
6 paragraph that we were just reading as the instructions
7 by which I was following.

8 Q. You'd not received any legal instruction on
9 whether or not it is ever permissible to use hindsight?

10 A. Not to the -- I do not recall ever receiving
11 that type of legal information.

12 Q. You don't know whether or not it is
13 permissible to use hindsight in certain circumstances?

14 A. I have never been told that that's the case,
15 so I -- so I -- so, yes, that would be correct. I don't
16 know if it's permissible under other circumstances.

17 Q. In your declaration you reach certain
18 conclusion that -- conclusions as to whether or not
19 various claims of the patent are obvious, correct?

20 A. Yes, there is some discussion in those cases.

21 Q. And what does it mean to you for a claim to be
22 obvious?

23 A. So that goes back to the definition of a
24 POSITA and what a POSITA would -- whether or not a
25 POSITA would easily or, to use that term, obviously

1 anticipate a certain principle that's being expressed.

2 Q. Does a combination of prior art have to have
3 the same advantages as the patent for that combination
4 to be obvious?

5 A. Does it have to have the same advantages --
6 that's what you said -- of the patent?

7 Q. Does a combination of prior art have to have
8 the same advantages as the patent for that combination
9 to be obvious?

10 MR. KAPADIA: Objection. Calls for a legal
11 conclusion.

12 THE WITNESS: Yeah, so -- so I don't have a
13 legal -- a legal answer to that question.

14 BY MR. VINCENT:

15 Q. You're uncertain of whether or not legally a
16 combination of prior art has to have the same advantages
17 as the patent for that combination to be obvious?

18 A. I would say I'm uncertain. I mean, the
19 paragraph that we're in right now has -- has assertions
20 that are alluded to by this impermissible hindsight, and
21 those assertions are listed as advantages. And I'm
22 sorry, to be more specific, advantages that are not
23 necessarily explicitly called out in the '774 patent.

24 Q. As a general legal principle, you're uncertain
25 of whether a combination of prior art has to have the

1 same advantages as the patent in order for that
2 combination to be obvious?

3 MR. KAPADIA: Objection. Calls for a legal
4 conclusion.

5 THE WITNESS: Right. So I am uncertain
6 because I don't have that legal background to draw the
7 legal conclusion. I'm an engineer rather than a trained
8 patent attorney.

9 BY MR. VINCENT:

10 Q. Understandable. And you were never provided
11 with legal guidance on that point of law?

12 MR. KAPADIA: Objection to form.

13 THE WITNESS: That is correct. I was provided
14 with the section -- or the definitions that we were
15 looking at earlier.

16 MR. VINCENT: I will pass the witness.

17 MR. KAPADIA: Let's take a five-minute break.

18 (Recess.)

19 MR. KAPADIA: Welcome back, Dr. Cormier. I
20 don't have any further questions. I just want to thank
21 you for your time today.

22 THE WITNESS: Okay. You're welcome.

23 COURT REPORTER: Mr. Kapadia, would you like a
24 transcript, sir?

25 MR. KAPADIA: No, thank you.

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1 MR. VINCENT: And can I get a transcript, a
2 final by Tuesday?

3 COURT REPORTER: Sure.

4 You want the rough today still?

5 MR. VINCENT: Rough today; final Tuesday would
6 be awesome.

7 (Whereupon the proceedings concluded at
8 12:36 a.m.)

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1	ERRATA SHEET		
2	NAME OF CASE: SHENZHEN TUOZU TECHNOLOGIES v. STRATASYS, INC.		
3	DATE OF DEPOSITION: APRIL 3, 2026		
4	NAME OF DENIS R. CORMIER: DENIS R. CORMIER		
5	Reason Codes:		
6	1: To clarify the record.		
7	2: To conform to the facts.		
8	3: To correct transcription error.		
9	Page _____	Line _____	Reason _____
10	From _____	to _____	
11	Page _____	Line _____	Reason _____
12	From _____	to _____	
13	Page _____	Line _____	Reason _____
14	From _____	to _____	
15	Page _____	Line _____	Reason _____
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17	Page _____	Line _____	Reason _____
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22	From _____	to _____	
23			
24	Deponent's Signature _____		
25	Date _____		

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DECLARATION UNDER PENALTY OF PERJURY

I, DENIS R. CORMIER, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on April 3, 2026; that I have made such corrections as appear noted on the Deposition Errata Page(s), attached hereto, signed by me; that my testimony as contained herein, as corrected, is true and correct.

This Declaration is executed this _____ day of _____, 2026, at _____, California.

DENIS R. CORMIER

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**I, Tamara Houston, RPR, CCRR, CSR No. 7244, a
Certified Shorthand Reporter in the State of California,
duly empowered to administer oaths, do hereby certify:**

That said deposition was taken down by me in shorthand at the time and place therein named, and thereafter reduced to typewriting by computer-aided transcription under my direction;

That the dismantling, unsealing, or unbinding of the original transcript will render the reporter's certification null and void.

I further certify that I am not interested in the event of the action.

In witness whereof, I have hereunto subscribed my
name.

Dated: 6th of April, 2026.

Zamara L. Houston

TAMARA L. HOUSTON
CSR 7244, RPR, CCRR 140, CRG

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