

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 BEFORE THE PATENT TRIAL AND APPEAL BOARD

3 -----
4 EVENFLO COMPANY, INC.,

5 Petitioner,

6 vs.

Case No. IPR2025-01140

7 BABY JOGGER, LLC,

8 Patent Owner.
9 -----

10
11 Deposition of DOUGLAS S. PRAIRIE, P.E.

12 August 3, 2026

13 9:50 a.m.

14 via

15 Remote Zoom

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20
21
22
23
24 Court Stenographer:

25 Dawn M. Lahti, RPR/CRR

A P P E A R A N C E S

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* * * * *

A L S O P R E S E N T

Ms. Christine Stroia Twin, Concierge Tech

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I N D E X

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Disposition of Original Exhibits:
Attached to Original Transcript.

1 TRANSCRIPT OF PROCEEDINGS. 12:00:02

2 DOUGLAS S. PRAIRIE, P.E., called as a 12:00:02

3 witness herein, having been first duly sworn on 12:00:02

4 oath, was examined and testified as follows: 12:00:02

5 EXAMINATION 12:00:03

6 BY MR. THOMAS: 09:32:49

7 Q Good morning, Mr. Prairie. If you would please 09:50:54

8 open up in the marked exhibits folder 09:50:57

9 Exhibit 1082, your rebuttal or reply 09:51:02

10 declaration. 09:51:05

11 A Okay, I have it open. 09:51:12

12 (Exhibit 1082 was marked for 09:51:13

13 identification.) 09:51:13

14 BY MR. THOMAS: 09:51:13

15 Q Depending on how -- whichever is more 09:51:14

16 convenient for you, scrolling around in the 09:51:16

17 Exhibit Share platform or downloading it, I 09:51:18

18 think either one is available to you. 09:51:20

19 Did you do any -- did you do any 09:51:22

20 testing or demoing of the Exhibit Share 09:51:27

21 platform before this deposition? 09:51:29

22 A I did not. 09:51:31

23 Q Have you ever used this platform for doing 09:51:37

24 depositions remotely? 09:51:40

25 A I don't recognize -- I recognize the Veritext 09:51:44

1 brand name, but these interfaces are different. 09:51:48

2 Q Well, if you have any problems with it, let's 09:51:53

3 just -- just let us know so that we can talk it 09:51:55

4 through and try and resolve any issues. 09:51:58

5 If you would, please turn to 09:52:01

6 page 27. You can use the page field at the top 09:52:03

7 directly, type in that number, and it will go 09:52:13

8 to it. 09:52:15

9 A I'm on page 27. 09:52:16

10 Q Look at paragraph 40. 09:52:17

11 A Okay. I'm on paragraph 40. 09:52:22

12 Q You wrote or you testified "A POSITA 09:52:24

13 understands that precise dimensions down to the 09:52:28

14 millimeter can only be made on engineering 09:52:30

15 drawings." 09:52:32

16 Did I read that correctly? 09:52:33

17 A You read that line correctly. 09:52:47

18 Q A patent figure is not an engineering drawing, 09:52:49

19 correct? 09:52:51

20 A A patent drawing is not an engineering drawing 09:52:55

21 in the sense to build it or produce it. 09:52:57

22 Q Okay. The next sentence of paragraph 40 you 09:53:01

23 testify, "A POSITA would not attempt to measure 09:53:04

24 Figure 16 to determine the relative placements 09:53:08

25 of components with precision because it is 09:53:10

1 imprecise and was never intended to show 09:53:13

2 accurate dimensions." 09:53:16

3 Did I read that correctly? 09:53:17

4 A Yes, you read that line as it's stated in that 09:53:22

5 document. 09:53:24

6 Q And in paragraph 41 the next paragraph 09:53:24

7 testified, "Dimensions cannot be measured on a 09:53:29

8 view that is even slightly in perspective 09:53:33

9 because the angles and distances are 09:53:36

10 distorted." 09:53:37

11 That's your opinion, correct? 09:53:39

12 A Yes. From an engineering drawing standpoint, 09:53:42

13 you need to have plain or true projected views. 09:53:44

14 If you make dimensions off a perspective view, 09:53:49

15 they are inaccurate and not of a level of 09:53:52

16 precision that's needed for production 09:53:56

17 measurements. 09:53:59

18 Q Are you referring to an engineering drawing or 09:54:01

19 a patent drawing? 09:54:03

20 A We were talking about engineering drawings, so 09:54:10

21 "A POSITA further understands that dimensions 09:54:12

22 cannot be measured on a view that is even 09:54:15

23 slightly in perspective," so a perspective view 09:54:17

24 is an angled view, not a true planar view. 09:54:20

25 Q You just said we're talking about engineering 09:54:23

1 drawings. 09:54:25

2 Your testimony in paragraphs 40 09:54:26

3 and 41 is about the patent drawings, 09:54:27

4 specifically Exhibit 16 -- Figure 16 of 09:54:29

5 Exhibit 1051, correct? 09:54:35

6 A There's discussions about engineering drawings 09:54:38

7 as well. 09:54:39

8 (Exhibit 1051 was marked for 09:54:39

9 identification.) 09:54:39

10 BY MR. THOMAS: 09:54:39

11 Q That's not what this testimony is about, 09:54:40

12 though, correct? 09:54:42

13 A We are specifically talking about the patent 09:54:43

14 drawings and that patent drawings do not 09:54:46

15 typically measure patent drawings. You 09:54:50

16 typically put measurements on engineering 09:54:52

17 drawings. 09:54:54

18 Q Okay. So then it would also be true that in 09:54:55

19 patent drawings, dimensions cannot be measured 09:54:57

20 on a view that's even slightly in perspective 09:54:59

21 because the angles and distances are distorted, 09:55:01

22 correct? 09:55:05

23 A When looking at a perspective view, the 09:55:09

24 features are not of true planar orientation and 09:55:12

25 so, therefore, it is inappropriate to create 09:55:17

1 dimensions on those surfaces. 09:55:21

2 Q And so then you would agree that dimensions in 09:55:23

3 a patent drawing cannot be measured on a view 09:55:27

4 that's slightly in perspective because the 09:55:29

5 angles and distances are distorted; that is 09:55:31

6 your opinion, correct? 09:55:33

7 A It is not proper procedure to create -- put 09:55:38

8 dimensions on perspective views. 09:55:42

9 Q Paragraph 42 you disputed the Figure 16 of 09:55:44

10 Offord '341 is, quote, a true side view and to 09:55:48

11 scale, end quote, correct? 09:55:51

12 A Please restate your question, Warren. 09:55:58

13 Q In paragraph 41 -- sorry, excuse me. 09:56:01

14 In paragraph 42 you dispute that 09:56:03

15 Figure 16 of Offord '341 is, quote, a true side 09:56:06

16 view and to scale, end quote, correct? 09:56:10

17 A It is my position that Figure 16 is a 09:56:15

18 perspective view. 09:56:19

19 Q So the answer to my question would be yes, 09:56:20

20 correct? 09:56:23

21 A Figure 16 is a perspective view. 09:56:26

22 Q I'm going to ask it one more time, Mr. Prairie, 09:56:29

23 and I'd ask you to listen carefully and answer 09:56:31

24 the question that I asked. 09:56:34

25 You dispute that Figure 16 of 09:56:37

1 Offord '341 is a true side view and to scale, 09:56:39
2 correct; you dispute that? 09:56:43

3 A I state that Figure 16 is a perspective view. 09:56:49
4 I guess you can interpret that how you want, 09:56:53
5 but Figure 16 is a perspective view, not a true 09:56:55
6 planar view. 09:56:58

7 Q I can interpret that how I want, I suppose. 09:56:59
8 But I'm asking you how you interpret your 09:57:02
9 statement "To the extent Figure 16 is a true 09:57:04
10 side view and to scale which I dispute"... 09:57:08

11 So you dispute that Figure 16 is 09:57:13
12 a true side view and to scale, don't you? 09:57:15

13 A I view that Figure 16 as a perspective view. 09:57:20

14 Q It's a yes-or-no question, Mr. Prairie. 09:57:24

15 You wrote "To the extent Figure 09:57:27
16 16 is a true side view and to scale, which I 09:57:29
17 dispute," correct? 09:57:32

18 A That is the line -- what you just read is what 09:57:37
19 I wrote in paragraph 42. 09:57:40

20 Q So you dispute that Figure 16 is a true side 09:57:42
21 view and to scale? 09:57:45

22 A I agree with what I wrote in paragraph 42, yes. 09:57:48

23 Q Part of your reasoning is that Offord '341 09:57:51
24 nowhere states that Figure 16 is drawn to 09:57:54
25 scale, correct? 09:57:57

1 A Yes, the typical patent drawings don't have 09:58:01
2 scales are not scale -- engineering scale 09:58:05
3 drawings typically. 09:58:07

4 Q And so on that basis you concluded 09:58:08
5 Dr. Cameron's annotated dimensions are "Of no 09:58:11
6 value in expressing the understanding of a 09:58:14
7 POSITA," correct? 09:58:17

8 A Well, POSITA can gather information from them 09:58:24
9 but not the level of information of dimensional 09:58:34
10 accuracy that she was attempting to acquire. 09:58:35

11 Q You actually testified, "Therefore, I believe 09:58:38
12 that Dr. Cameron's annotated dimensions are of 09:58:41
13 no value in expressing the understanding of a 09:58:44
14 POSITA," correct? 09:58:47

15 A In regards to her measurements. 09:58:52

16 Q If you would, go back to the marked exhibits 09:59:02
17 folder and pull up Exhibit 1050. Let me know 09:59:06
18 when you have that open. 09:59:24

19 A I have 1050 open. 09:59:29

20 Q Now go down to paragraph 12, which is on the 09:59:31
21 second page. 09:59:42

22 Do you see that? 09:59:51

23 A I see Figure -- I see paragraph 12 that you 09:59:54
24 identified. 09:59:58

25 Q And paragraph 12 of Exhibit 1050 states, 09:59:58

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1 "Figure 9 is a side view of an example tandem 10:00:02
2 stroller disclosed herein having an example 10:00:05
3 intermediate wheel." 10:00:08

4 Did I read that correctly? 10:00:10

5 A Yes, you read that correctly as stated in that 10:00:16
6 document. 10:00:19

7 Q And this exhibit, which is referred to as 10:00:19
8 W0157, it nowhere states that Figure 9 is drawn 10:00:22
9 to scale, correct? 10:00:27

10 A Looking at Figure 9, the other figures I do not 10:01:01
11 see a scale -- engineering, typical scale on 10:01:03
12 these drawings. They're more patent rendering 10:01:07
13 drawings. 10:01:09

14 Q So you anticipated my next question. 10:01:10

15 Figure 9 is a patent drawing, 10:01:13
16 not an engineering drawing, correct? 10:01:15

17 A Figure 9 is a patent drawing. 10:01:20

18 Q Okay. Let's go back to your declaration, 10:01:24
19 Exhibit 1082. 10:01:31

20 Frankly, it may be helpful to 10:01:33
21 download that file and can you -- do you have 10:01:35
22 room on your screen to do like a side-by-side 10:01:37
23 of things to have two documents open at once? 10:01:40

24 A Yeah. 10:01:44

25 Q It may be helpful to have your reply 10:01:45

1 declaration open separately. I'll ask. 10:01:47

2 Do you have any other documents 10:01:53

3 open on your computer right now? 10:01:54

4 A I do not. 10:01:56

5 Q Paragraph 23 of your rebuttal testimony. Find 10:02:03

6 that, and let me know when you have it in front 10:02:08

7 of you? 10:02:10

8 A I have paragraph 23 up of my Exhibit 1082. 10:02:25

9 Q You also have -- paragraph 23 states, "The hubs 10:02:37

10 and mating interfaces are identical for both 10:02:41

11 seats." 10:02:44

12 Do you see that? 10:02:44

13 A I see the line you just read. 10:02:45

14 Q And that has a citation. It cites one thing, 10:02:47

15 Exhibit 1050, Figure 9, correct? 10:02:51

16 A Yes, that is a correct reference. 10:02:58

17 Q Same paragraph, "Mirrored left to right and 10:03:01

18 centrally aligned." 10:03:07

19 Do you see that? 10:03:08

20 A Yes. 10:03:10

21 Q The only citation for that is also Figure 9, 10:03:13

22 correct? 10:03:17

23 A Yeah, I don't remember if that was just 10:03:34

24 Figure 9 or not the deposition was made off of. 10:03:35

25 Q But the only thing you offered in your 10:03:41

1	testimony in paragraph 23 to support that	10:03:43
2	statement is a citation to Exhibit 1050,	10:03:45
3	Figure 9, correct?	10:03:48
4	A That paragraph specifically calls out Figure 9,	10:03:53
5	but I don't remember. I may have used the	10:03:56
6	other figures in the documents to make that	10:03:58
7	statement.	10:04:00
8	Q But you didn't identify any of those in this	10:04:02
9	testimony, correct?	10:04:04
10	A In this particular paragraph, I only cite	10:04:05
11	Figure 9.	10:04:07
12	Q And you performed no measurements of Figure 9,	10:04:09
13	correct?	10:04:12
14	A No, I just -- from a POSITA standpoint, I'm	10:04:17
15	visually looking at the pictures and the	10:04:22
16	references.	10:04:25
17	Q Did you perform any -- you did not analyze	10:04:28
18	Figure 9 in a -- strike that. Start over.	10:04:30
19	You did not analyze Figure 9 in	10:04:33
20	a CAD program, correct?	10:04:35
21	A I did not load Figure 9 into a CAD program to	10:04:39
22	make that assessment.	10:04:43
23	Q Okay. Let's turn back to Exhibit 1050. Let me	10:04:44
24	know when you have that open.	10:05:03
25	A Okay.	10:05:05

1	Q	Turn to Figure 9.	10:05:05
2	A	I have Figure 9 open.	10:05:07
3	Q	In Figure 9, 913a, is shown facing rearward and	10:05:09
4		seat 913b facing forward, one position each,	10:05:16
5		correct?	10:05:20
6	A	Just to clarify making sure we're consistent,	10:05:23
7		can you describe what forward and backward	10:05:25
8		means to you, what your reference point is?	10:05:28
9	Q	My reference point is the same reference point	10:05:50
10		that you used in your testimony in both your	10:05:52
11		original declaration and your rebuttal	10:05:54
12		declaration.	10:05:59
13		So why don't you tell us what	10:05:59
14		that was, Mr. Prairie.	10:06:00
15	A	Okay. Please restate your question then.	10:06:04
16	Q	Explain the perspective and meaning of forward	10:06:08
17		and rearward that you used in your testimony in	10:06:12
18		your rebuttal declaration.	10:06:14
19	A	I would say that a reference from pushing the	10:06:30
20		stroller in a forward direction, 913b would	10:06:34
21		be -- that seat would be facing forward. Seat	10:06:38
22		913a, the child in that seat would be facing	10:06:41
23		backwards.	10:06:45
24	Q	So explain what forward and rearward -- the	10:06:55
25		question was explain what forward and rearward	10:06:58

1 mean as you have used it in your testimony in 10:07:01
2 your rebuttal declaration. 10:07:05

3 A A forward-facing seat would be as how 913b is 10:07:18
4 shown where the child is facing forward. A 10:07:22
5 rear-facing seat would be where the child is 10:07:25
6 facing backwards towards the parent or whoever 10:07:28
7 is pushing the stroller. 10:07:32

8 Q So 913b in Exhibit 1050, Figure 9, 913b is 10:07:38
9 facing forward, correct? 10:07:45

10 A Yes. 913b in Figure 9 of Exhibit 1050 would be 10:07:50
11 the child would be facing in a forward-facing 10:07:54
12 direction. 10:07:57

13 Q And 913a is facing rearward, correct? 10:08:03

14 A In Figure 9 the child as shown in Figure 9 with 10:08:07
15 that seat configuration there, 913a, the child 10:08:11
16 would be facing a rearward-facing direction. 10:08:14

17 Q And no figure shows a seat 913b facing forward, 10:08:18
18 does it? 10:08:25

19 A Within that document there are seats showing in 10:08:43
20 forward and rear-facing direction and a POSITA 10:08:47
21 understanding at that time of this document 10:08:51
22 that it was commonplace for children seats to 10:08:52
23 be facing in a forward and rearward -- 10:08:56
24 alternate configurations. 10:08:59

25 Q But there is no seat labeled 913a in any figure 10:09:01

1 that is facing forward, correct? 10:09:07

2 A You'll have to give me some time. This is a 10:09:11

3 lengthy document. I can do some further review 10:09:14

4 of this document. 10:09:16

5 Q Please take your time. It's your time, sir. 10:09:17

6 A Could you please load the other Rolicki 10:10:48

7 document as well. 10:10:51

8 Q I'm not asking you about Rolicki. I'm asking 10:10:51

9 you about Exhibit 1050. 10:10:54

10 A Yes, but the Rolicki is part -- it's 10:10:57

11 all-encompassing as part of this. It's -- 10:11:00

12 they're really tied together. 10:11:03

13 Q Sir, I did not ask you about the Rolicki 10:11:07

14 document. I asked you about Exhibit 1050. You 10:11:11

15 can answer that question. 10:11:15

16 Exhibit 1050 does not show any 10:11:16

17 figure with a seat 913b facing forward, 10:11:22

18 correct? 10:11:26

19 A 913b is facing forward. It is forward facing. 10:11:40

20 Q Well -- 10:11:47

21 A So, yes, the answer to your question is, yes, 10:11:47

22 913b is facing forward. 10:11:50

23 Q Right. I misstated my original question which 10:11:52

24 is there is no 913a shown in Exhibit 1050 10:11:56

25 facing forward, correct? 10:12:01

1 A So what is your question you're asking now? 10:12:06

2 Q It was the original one. There is no figure in 10:12:09

3 Exhibit 1050 that shows a seat 913a facing 10:12:13

4 forward, correct? 10:12:20

5 A There are other figures of a front seat facing 10:12:29

6 forward. 10:12:31

7 Q But none of them are labeled 913a, are they? 10:12:32

8 A There's multiple labels in here. 10:12:39

9 Q I gave you some time a few moments ago to 10:12:43

10 review the figures, and you haven't located or 10:12:46

11 identified any other figure showing a 913a 10:12:49

12 facing forward, correct? 10:12:54

13 A But there are other images of other seats 10:12:56

14 facing forward, and they have multiple 10:12:59

15 identifications. 10:13:00

16 I got to read -- go through a 10:13:01

17 further review of the document and identify 10:13:04

18 each seat and how they're identified and how 10:13:06

19 they're cross-referenced. If you'd like, I can 10:13:08

20 do that now. 10:13:11

21 Q That's not what I asked you to do. I asked you 10:13:12

22 if there is any figure that shows a seat 10:13:14

23 labeled 913a facing forward. 10:13:18

24 You can either answer that 10:13:22

25 question or you can refuse to answer that 10:13:23

1 question. 10:13:24

2 Which is it going to be, 10:13:25

3 Mr. Prairie? 10:13:27

4 A I want to read the context of this document and 10:13:28

5 understand what they describe as 913 A and B 10:13:31

6 again and how they reference that to the other 10:13:35

7 seats. 10:13:37

8 So give me some time, and I will 10:13:40

9 cross-reference and see how they describe and 10:13:41

10 how they associate that with the other seats. 10:13:44

11 Q I don't need you to make any speeches, 10:13:46

12 Mr. Prairie. I understand that you don't want 10:13:48

13 to answer that question. I'll move on to the 10:13:50

14 next question. 10:13:52

15 Figure 9 shows both seats 10:13:52

16 installed onto the frame or coupled to the 10:13:54

17 frame, correct? 10:13:57

18 A Let me go back to Figure 9 again. I'm back on 10:14:02

19 Figure 9. 10:14:10

20 Q Figure 9 shows both seats installed onto the 10:14:12

21 frame, correct? 10:14:17

22 A Within Figure 9 both seats are in an installed 10:14:24

23 configuration. 10:14:27

24 Q In Figure 9 the hub visible on each seat is the 10:14:28

25 mirror side hub, nearer to the viewer, correct? 10:14:32

1 A Can you please identify what you're calling a 10:14:39
2 hub in this figure? 10:14:41

3 Q What did you call a hub in the figure, 10:14:42
4 Mr. Prairie? Actually, strike that. 10:14:45

5 I ask questions generally. If 10:14:51
6 you have a confusion or clarification, then you 10:14:54
7 can ask me to clarify. The clarification I 10:14:56
8 would offer you is to use the same hub that you 10:14:58
9 used to use and refer to in your testimony. 10:15:02

10 And given that clarification in 10:15:06
11 Figure 9, the hub visible on each seat is the 10:15:09
12 mirror side hub, isn't it? 10:15:12

13 A My rebuttal didn't identify which hub the part 10:15:35
14 number was, so I'm going to have to reference 10:15:38
15 back and make sure that I'm referencing the 10:15:40
16 same one that I did before. 10:15:43

17 Let me get a little time and 10:15:44
18 make sure I reference the hub number correctly 10:15:46
19 in this figure. 10:15:48

20 Q What is it you're looking at to ensure you're 10:15:55
21 referencing the correct number? 10:15:57

22 A I'll tell you when I get there. 10:15:59

23 Q What document are you looking at right now? 10:16:01

24 A I'm looking at 1050. 10:16:03

25 Q Okay. I'll direct your attention to your 10:16:05

1 paragraph 22 of Exhibit 1082. 10:16:07

2 You can look at that paragraph, 10:16:13

3 and let me know if that refreshes your 10:16:14

4 recollection what the hub is in Exhibit 1050. 10:16:17

5 A Okay. Yep, so there's hubs 922. I just wanted 10:16:36

6 to confirm that that was consistent. 10:16:39

7 Q Okay. So in Figure 9, to repeat the question, 10:16:41

8 the hubs visible on each seat is the near side 10:16:46

9 hub, correct? 10:16:50

10 MR. CUNNINGHAM: Warren, did you say 10:16:55

11 near side or mirror side? 10:16:56

12 MR. THOMAS: "Near" as in closer to 10:16:59

13 the viewer. 10:17:01

14 THE WITNESS: Within Figure 9, the 10:17:05

15 hubs 922 that you can see there, yes, I would 10:17:07

16 agree those are the near side closest to I 10:17:09

17 guess what you would see. 10:17:12

18 BY MR. THOMAS: 10:17:14

19 Q The mating services, the services of hub 922 10:17:17

20 and the seats, quote, mating hub or surface 10:17:19

21 that engage each other, do you remember -- I 10:17:22

22 think you -- yeah, in paragraph 23 of your 10:17:26

23 testimony in your rebuttal said, "The hubs and 10:17:30

24 mating interfaces are identical for both 10:17:34

25 seats." 10:17:36

1 So I would like for you to point 10:17:38
2 to -- or describe where the mating services of 10:17:41
3 the hubs are in Figure 9, where they are 10:17:48
4 visible to the POSITA. 10:17:52

5 A Please restate your question, Warren. 10:18:25

6 Q Let me try it a little differently. I think it 10:18:43
7 was perhaps a confusing question. 10:18:46

8 Turn to paragraph 63 of 10:18:49
9 Exhibit 1050. That's PDF page 16, labeled page 10:18:53
10 50. 10:19:07

11 A Okay. I'm on page 16 of 1050. Is it label 15, 10:19:14
12 that what you're -- 10:19:19

13 Q Paragraph 63 is what we're looking for. The 10:19:25
14 last sentence says, "The hubs 922 receive or 10:19:28
15 engage with a mating hub or surface of the 10:19:31
16 seats 913a, 913b." 10:19:33

17 And my question to you is, can 10:19:38
18 you point to where in Figure 9 those surfaces 10:19:41
19 of the seats or the mating hub are visible? 10:19:46

20 A I can't tell exactly where. I don't see an 10:21:35
21 actual component labeled to describe it to you. 10:21:39
22 But those bayonet-style features would be 10:21:44
23 interchangeable left and right and mirrored to 10:21:46
24 allow the seats to forward in a forward-facing 10:21:50
25 direction. 10:21:54

1	Q	And the reason you cannot see it is because	10:21:57
2		it's the outside face of the near side hub that	10:21:58
3		is shown in Figure 9, correct?	10:22:02
4	A	I just don't believe that the detail is shown	10:22:12
5		within that figure.	10:22:14
6	Q	And why is the detail not shown in that figure?	10:22:15
7	A	I can't tell you for sure, but it's -- I don't	10:22:19
8		see a label that identified it exactly shown.	10:22:23
9		It's described but not shown in that figure.	10:22:27
10	Q	It's not shown in any figure, correct?	10:22:31
11	A	My rebuttal only talks about this figure	10:22:35
12		particularly, I believe.	10:22:38
13	Q	And it's not shown in any figure, correct?	10:22:40
14	A	I'd have to do a further evaluation to go	10:22:45
15		through every figure in more detailed fashion.	10:22:49
16	Q	And you did that evaluation when you were	10:22:51
17		preparing your rebuttal declaration, correct?	10:22:53
18	A	The rebuttal is focused on Figure 9.	10:22:58
19	Q	Exhibit 1050 includes partial enlarged views of	10:23:07
20		a wheel in Figure 20B, correct?	10:23:11
21	A	Say that again.	10:23:18
22	Q	If you look at Figure 20B of Exhibit 1050.	10:23:19
23	A	Figure 20B?	10:23:31
24	Q	Do you see that?	10:23:39
25	A	I'm getting there. I'm looking at Figure 20B.	10:23:39

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1 Q That's a partial enlarged view of a wheel, 10:23:47
2 correct? 10:23:49

3 A Yes, that appears to be an enlarged view of the 10:23:57
4 wheel assembly. 10:24:00

5 Q And it shows -- the same exhibit shows partial 10:24:04
6 enlarged views of a suspension apparatus in 10:24:09
7 Figures 23 to 25, correct? 10:24:11

8 A I see Figures 23, 24, and 25. I don't know 10:24:26
9 what they're labeled as. 10:24:28

10 Q If I direct your attention to paragraphs 24 and 10:24:31
11 26, that might provide a clue. 10:24:35

12 A What page is that on? 10:24:46

13 Q It's on PDF, page 3, if you type 3 in the page 10:24:47
14 navigation. 10:24:58

15 A Which figures were you looking at again? 10:25:01

16 Q Figures 23 to 25. These are described as 10:25:03
17 enlarged views of an example suspension 10:25:10
18 apparatus, correct? 10:25:16

19 MR. CUNNINGHAM: Objection. 10:25:20
20 Misstates the document. 10:25:20

21 THE WITNESS: Figure 23 states it's 10:25:23
22 an enlarged view of an example stroller of 10:25:24
23 Figure 19 having another example suspension 10:25:28
24 apparatus disclosed herein. 10:25:31

25 Figure 24 is an enlarged view of 10:25:34

1 another example of stroller Figure 19 having 10:25:37
2 another example suspension apparatus disclosed 10:25:39
3 herein. 10:25:43

4 Figure 25 states an enlarged view of 10:25:44
5 another example stroller Figure 19 having 10:25:47
6 another example suspension apparatus disclosed 10:25:50
7 herein. 10:25:53

8 BY MR. THOMAS: 10:25:54

9 Q But Exhibit 1050 contains no enlarged view of 10:25:55
10 the hubs 922, correct? 10:25:58

11 A Let me go through and view all figures again. 10:26:06
12 I'm not seeing a specific view called out as an 10:27:29
13 enlarged view of the hub. 10:27:31

14 Q And in your search, you did not see anything 10:27:33
15 that was a cross-section of the hubs 922, 10:27:37
16 correct? 10:27:41

17 There is no cross-section of the 10:27:46
18 hubs 922, correct? 10:27:47

19 MR. CUNNINGHAM: Objection. Form. 10:27:50

20 THE WITNESS: Within this document, 10:27:57
21 I'm not seeing most of the perspective views. 10:27:58
22 There's planar views. Figure 11 shows a 10:28:03
23 top-down view, some wheel configurations. Some 10:28:09
24 of these could be viewed as section views, I 10:28:14
25 guess. 10:28:17

1 BY MR. THOMAS: 10:28:19

2 Q But none show a section view of the hubs 922, 10:28:20

3 correct? 10:28:23

4 A When you mean by "section view," what specific 10:28:29

5 detail are you looking for in a section view -- 10:28:31

6 I mean in the hub -- 10:28:34

7 Q There is no view of a cross-section of the hubs 10:28:35

8 922 in this document, is there? 10:28:38

9 A I am not seeing a particular figure that has a 10:28:46

10 focused view of just the hub. It is part of -- 10:28:52

11 the hub is in many of the views but not one 10:28:57

12 that's just labeled as a hub cross-section or a 10:29:02

13 hub enlarged view. 10:29:07

14 Q Turn to paragraph 66 of Exhibit 1050. Sorry, 10:29:09

15 paragraph 63. 10:29:24

16 A Okay. I'm at paragraph 63. 10:29:31

17 Q And we looked at this sentence a few minutes 10:29:33

18 ago. The last sentence of paragraph 63 says, 10:29:37

19 "The hubs receive or engage with a mating hub 10:29:41

20 or surface of the seats 913a, 913b via, for 10:29:46

21 example, a bayonet connection." 10:29:51

22 Did I read that correctly? 10:29:55

23 A Please reread -- I got to where you were. 10:30:02

24 Please reread it so I make sure you said it 10:30:05

25 correctly. 10:30:08

1 Q Paragraph 63 states, "The hubs 922 receive or 10:30:09
2 engage with a mating hub or surface of the 10:30:12
3 seats 913a, 913b via, for example, a bayonet 10:30:16
4 connection." 10:30:21

5 Did I read that correctly? 10:30:22

6 A Yes, you read that correctly of paragraph 63. 10:30:26

7 Q And this is the only sentence in Exhibit 1050 10:30:29
8 describing how the hubs engage, correct? 10:30:33

9 A I don't know if that's the only statement. 10:30:41

10 Q Can you point to another? 10:30:42

11 A Would you like me to reread through it and find 10:30:46
12 it, see if I can find anything? 10:30:48

13 Q You can read it. You can use the search 10:30:52
14 function that is in the top right of the 10:30:55
15 Exhibit Share. There's a little magnifying 10:30:57
16 glass icon. You can look at paragraph 22 of 10:31:00
17 your declaration, which might provide you clues 10:31:07
18 as to other paragraphs that you relied on 10:31:10
19 relating to your testimony about the hubs 922. 10:31:12

20 (Witness peruses document.) 10:31:15

21 BY MR. THOMAS: 10:31:15

22 Q Mr. Prairie, I just saw you looking down. 10:31:28

23 Can I ask what you were looking 10:33:22
24 at when you were looking downward? 10:33:23

25 A I have a copy of my declaration hard copy. 10:33:25

1 Q Okay. Are there any markings on that 10:33:30
2 declaration? 10:33:31

3 A No. It's a clean copy. 10:33:32

4 Q Okay. Thank you. As a reminder, the question 10:33:34
5 is that the sentence we read in paragraph 63 is 10:33:39
6 the only sentence in W0157, Exhibit 1050, 10:33:45
7 describing how the hubs engage, isn't it? 10:33:50

8 (Witness peruses document.) 10:33:52

9 BY MR. THOMAS: 10:33:52

10 Q Mr. Prairie, you've been looking for some time. 10:36:46
11 Have you found any yet? 10:36:48

12 A It's a lengthy document, and you've asked me 10:36:50
13 anywhere else in the document, so I'm reviewing 10:36:53
14 it to make sure I can answer your question 10:36:55
15 accurately. 10:36:57

16 Q Can you describe the process you're using for 10:36:58
17 reviewing it so that we know what it is you're 10:37:00
18 doing? 10:37:04

19 A Yeah, I'm reading the document. 10:37:04

20 Q Are you going to read the entire document cover 10:37:05
21 to cover to be able to answer the question? 10:37:09

22 A You asked me a specific -- for specific tests 10:37:11
23 within the document, so that's -- I'm doing a 10:37:14
24 search reading through it and see if there's 10:37:17
25 any further words or clarification to answer 10:37:19

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```
1 | your question. 10:37:21
```

2	Q	How about this? Do a search for the word	10:37:23
---	---	--	----------

```
3 | "hub." Do you see how to do that? 10:37:27
```

4	A	I can search on my own so...	10:37:32
---	---	------------------------------	----------

5	Q	Okay. So search for the word "hub."	10:37:35
---	---	-------------------------------------	----------

```
6 | A I'm going to continue with my process. So I'm 10:37:38
```

7 | partway through, so I'm not going to change my 10:37:41

```
8 process at this point. I'm quite a ways 10:37:43
```

9	through.	10:37:45
---	----------	----------

10	Q	Okay.	10:37:46
----	---	-------	----------

11	(Witness peruses document.)	10:37:46
----	-----------------------------	----------

12	THE WITNESS: The paragraph 63	10:41:01
----	-------------------------------	----------

13	appears to be the only paragraph that I can	10:41:03
----	---	----------

```
14 locate that describes the hub and interface of 10:41:06
```

```
15 |         those bayonet connections.                                10:41:12
```

16	BY MR. THOMAS:	10:41:13
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17	Q	Now I'm going to ask to use the search function	10:41:17
----	---	---	----------

```
18 |         to search the text of this document.                                10:41:22
```

19	Can you search for the word	10:41:27
----	-----------------------------	----------

20 "keyed" in Exhibit 1057 and tell me whether or 10:41:29

```
21      not you see any results for the word "keyed,"    10:41:35
```

22	K-E-Y-E-D?	10:41:38
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23	A	Which exhibit are you wanting to do?	10:41:42
----	---	--------------------------------------	----------

24	0	The same exhibit, Exhibit 1050.	10:41:44
----	---	---------------------------------	----------

25	A	You said 1057, that's why --	10:41:47
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1	Q	I apologize. So Exhibit 1050, W0157. Please	10:41:50
2		do a word search for the word "keyed."	10:41:55
3		K-E-Y-E-D.	10:41:58
4	A	How is it spelled? K-E-Y-E-D?	10:42:08
5	Q	Yes.	10:42:11
6	A	No results found for the search K-E-Y-E-D	10:42:17
7		within Exhibit 1050.	10:42:20
8	Q	What about "keying," K-E-Y-I-N-G?	10:42:21
9	A	No results found for the word K-E-Y-I-N-G	10:42:27
10		within Exhibit 1050.	10:42:37
11	Q	Or how about the word "key," K-E-Y, text K-E-Y?	10:42:38
12	A	The word "key" was not located within	10:42:46
13		Exhibit 1050.	10:42:48
14	Q	How about the word "symmetric"?	10:42:49
15	A	I'm not seeing symmetric, but I see a few	10:43:20
16		searches for symmetrical and asymmetrical.	10:43:23
17	Q	Do any references to symmetrical or	10:43:27
18		asymmetrical refer to the hubs?	10:43:30
19	A	Let me look through them. I believe the first	10:43:33
20		one in paragraph 41 is talking about the left	10:44:12
21		and right frames being symmetrical from left	10:44:15
22		and right sides, if I'm understanding this	10:44:18
23		correctly. It's talking about side frames	10:44:20
24		being symmetrical.	10:44:33
25		There's quite a lengthy	10:44:51

1 discussion about the first and second side 10:44:53
2 frame assemblies are substantially similar, 10:44:54
3 identical, and are symmetrical. 10:44:57

4 Q When you search for symmetrical, did you get 10:44:59
5 four results that popped up in the more results 10:45:03
6 found? 10:45:07

7 A I did a full search for symmetrical, it came 10:45:07
8 up. It looks like there are four results. 10:45:10

9 Q Okay. And all four of those results, which if 10:45:14
10 you just click on each one, it jumps to that 10:45:18
11 reference, paragraphs 41, 52 in paragraph 59, 10:45:21
12 and one in paragraph 70. 10:45:25

13 Those are all referring to side 10:45:29
14 frame assemblies, correct? 10:45:32

15 A Talking about side frame assemblies being 10:45:42
16 symmetrical which is what the seats would 10:45:44
17 attach to. 10:45:46

18 Q And what about reversible, locate the word -- 10:45:48
19 find the word "reversible" in this document. 10:45:54

20 A I'm not seeing results for the word 10:46:09
21 "reversible" within this document. 10:46:10

22 Q Search for forward facing with a space or with 10:46:14
23 a hyphen. Sometimes I've seen both usages in 10:46:19
24 other documents, but tell me if you see either 10:46:26
25 usage in this document. 10:46:28

1	A	The word "forward" is used in paragraph 77.	10:46:38
2	Q	And that's the only place the word "forward"	10:46:42
3		appears in the document, correct?	10:46:45
4	A	With this search, I'm only seeing it show up	10:46:48
5		once.	10:46:50
6	Q	Okay. What about "rearward"?	10:46:51
7	A	Within this document, I'm not seeing any search	10:47:00
8		results for the word "rearward".	10:47:02
9	Q	What about "backward"?	10:47:04
10	A	I'm not seeing any results for the word	10:47:16
11		"backward."	10:47:19
12	Q	What about "rear facing" with a space or a	10:47:20
13		hyphen between rear and facing? There's no	10:47:25
14		search results for that either, is there?	10:47:47
15	A	I'm not seeing any words. I just typed in	10:47:49
16		facing. I don't see any search results for	10:47:53
17		facing.	10:47:55
18	Q	Exhibit 1050 never states that the seats 913a	10:48:01
19		and 913b are the same seat, correct?	10:48:04
20	A	I'm unable to answer that question without a	10:48:12
21		further review.	10:48:14
22	Q	Okay. Perhaps you could search for 913a and	10:48:15
23		913b and read the descriptions of those to see	10:48:19
24		if they are ever described as being the same	10:48:22
25		seat.	10:48:25

1 (Witness peruses document.) 10:49:06

2 THE WITNESS: I see multiple labels 10:49:21

3 of 913 and 913b. But looking at the figure, 10:49:22

4 they look -- if you take a look at 913a and 10:49:32

5 913b within the figures, visually they look 10:49:36

6 identical. 10:49:39

7 From my understanding is usually when 10:49:41

8 you do a subscript like that, that they're 10:49:43

9 identical. They're just showing same thing, 10:49:45

10 just multiples of them. 10:49:48

11 BY MR. THOMAS: 10:49:53

12 Q But the document never says that they are the 10:49:54

13 same seat, correct; you didn't find any when 10:49:57

14 you just looked? 10:50:00

15 A You can also extrapolate forward. You looked 10:50:11

16 at 1213a and 1213b, which are also seats, and 10:50:13

17 those are both forward facing, and to me they 10:50:19

18 look identical. 10:50:21

19 There's really no reason to 10:50:22

20 have -- a POSITA would not assume that you 10:50:23

21 would have to have a certain forward seat just 10:50:29

22 for the front spot and a unique seat for the 10:50:30

23 rear -- for the rear position. 10:50:34

24 So 1213a and 1213b would simply 10:50:37

25 tell me that, hey, there's the same identical 10:50:41

1 seat. One is A, one is B. I could take the 10:50:43
2 same thing for 913a and b, same exact seat. 10:50:46
3 One is forward facing, one is rearward facing. 10:50:51
4 Figure 9 depicts a forward 10:50:53
5 facing and rearward-facing configuration. I 10:50:55
6 don't always need text to tell me that they are 10:50:57
7 one and the same. 10:51:01
8 MR. THOMAS: Move to strike as 10:51:04
9 nonresponsive. 10:51:05
10 BY MR. THOMAS: 10:51:07
11 Q The document never states that 913a can be 10:51:08
12 installed where 913b is installed, correct? 10:51:11
13 A A POSITA reading through the document and 10:51:21
14 looking through the images would understand 10:51:23
15 that they would be -- you could reverse them. 10:51:25
16 Q And you used the word "understand" there 10:51:30
17 because the document does not say it, but 10:51:31
18 that's an assumption or an inference you are 10:51:34
19 making, correct? 10:51:37
20 A Well, a POSITA at the point in time of this 10:51:39
21 document forward and rear-facing seats for the 10:51:42
22 same stroller were commonplace, and one would 10:51:45
23 take a look at this document and reading 10:51:47
24 through it and understand that that would be 10:51:50
25 easily obtainable given the pictures and the 10:51:52

1 document that was -- and the patent document. 10:51:56

2 MR. THOMAS: Hold on just a moment. 10:52:05

3 BY MR. THOMAS: 10:52:11

4 Q I'm going to ask my question again, 10:52:12

5 Mr. Prairie. 10:52:13

6 The document does not state that 10:52:14

7 seat 913a can be installed where seat 913b is 10:52:16

8 installed, correct? 10:52:22

9 A Reading through it, a POSITA would understand 10:52:27

10 that a subscript in a patent A and B, they're 10:52:29

11 interchangeable seats. Reading through the 10:52:32

12 description -- 10:52:35

13 Q Mr. Prairie, I don't need another speech. I 10:52:36

14 asked a yes-or-no question. 10:52:38

15 The document does not say it, 10:52:40

16 does it? 10:52:42

17 A A POSITA would read through the document and 10:52:48

18 understand reading through the images in the 10:52:50

19 text and knowing their experience of strollers 10:52:52

20 at the time would confer that that was -- 10:52:57

21 Rolicki was -- the intent was that the seats 10:53:01

22 could be swapped around directions. 10:53:04

23 When you talk about symmetry, 10:53:07

24 you asked me to do a search on symmetry. The 10:53:09

25 left and right frames are symmetrical which 10:53:11

1 would also lead into symmetry in the other 10:53:13
2 direction as well. 10:53:15

3 If left and right symmetry, then 10:53:18
4 that would allow 913a and b to be symmetrical 10:53:20
5 as well to be reconfigured as a rearward and 10:53:25
6 forward-facing configuration. 10:53:29

7 So to me, yes, the document does 10:53:30
8 state a POSITA reading through it would be able 10:53:32
9 to infer that, yes. 10:53:35

10 MR. THOMAS: Move to strike as 10:53:37
11 nonresponsive. 10:53:38

12 BY MR. THOMAS: 10:53:39

13 Q Mr. Prairie, I'm going to ask you again to 10:53:40
14 answer the question that is asked, not to give 10:53:41
15 the speech that you would like to make to be 10:53:43
16 able to try and supplement the record and offer 10:53:45
17 your opinions. You've already offered your 10:53:47
18 opinions in here. This is to ask questions 10:53:49
19 that I asked. 10:53:52

20 Do you understand that? 10:53:53

21 MR. CUNNINGHAM: I'm going to object. 10:53:56
22 He can answer the questions how he feels he 10:53:57
23 needs to answer them. 10:53:59

24 That said, I was just disconnected, 10:54:00
25 and it sounds like you continued questioning 10:54:01

1 for the last three or four minutes while I've 10:54:04
2 been offline, which I think is improper. 10:54:06

3 MR. THOMAS: Well, your objection is 10:54:11
4 noted. No, we didn't -- I did not notice that 10:54:12
5 you had been disconnected. 10:54:15

6 BY MR. THOMAS: 10:54:16

7 Q Mr. Prairie. Did you notice Mr. Cunningham had 10:54:16
8 been disconnected? 10:54:19

9 A I guess I didn't realize it was my job to keep 10:54:24
10 track of everyone. 10:54:27

11 MR. THOMAS: Kyle, did you notice 10:54:29
12 Mr. Cunningham had been disconnected? 10:54:30

13 MR. KONZ: No, but I'm kind of just 10:54:35
14 on the side listening. I'm not paying precise 10:54:38
15 attention because I'm not defending this 10:54:40
16 deposition. 10:54:43

17 (Discussion off the record.) 10:55:07

18 BY MR. THOMAS: 10:55:08

19 Q The document -- let me strike that. No figure 10:55:09
20 of -- 10:55:12

21 A I don't think Tom is on again. 10:55:16

22 Q Say that again. 10:55:19

23 A I don't think Tom is on again. 10:55:20

24 Q You're right. He looks frozen. 10:55:20

25 MR. THOMAS: Are you there 10:55:22

1 Mr. Cunningham? 10:55:23

2 MR. CUNNINGHAM: Yeah, I'm still 10:55:25

3 here. I'm going to turn off my video. Maybe 10:55:26

4 that will help. I don't know what's going on. 10:55:29

5 Court reporter, do you have at least 10:55:33

6 an indication of when I dropped up? 10:55:34

7 (Discussion off the record.) 10:56:08

8 MR. CUNNINGHAM: You can do what you 10:56:12

9 want, but I'm going to object to the questions 10:56:13

10 for the last four minutes with a standing 10:56:15

11 objection. 10:56:16

12 MR. THOMAS: What was the last 10:56:17

13 question you heard, Mr. Cunningham? 10:56:18

14 MR. CUNNINGHAM: I don't even know. 10:56:21

15 I would have to see a transcript to see. I was 10:56:22

16 concerned with trying to get back on as quickly 10:56:26

17 as possible, but it took a while. 10:56:30

18 MR. THOMAS: Okay. I think we can 10:56:34

19 move forward. 10:56:35

20 BY MR. THOMAS: 10:56:37

21 Q Mr. Prairie, no figure of Exhibit 1050 shows -- 10:56:37

22 A I just want to throw out I'm at a breaking 10:56:41

23 point. I need a break. 10:56:44

24 MR. THOMAS: We can go off the record 10:56:46

25 and take a break. 10:56:47

1 (Recess taken from 10:56 a.m. to 10:56:49
2 11:03 a.m.) 11:03:18
3 BY MR. THOMAS: 11:03:27
4 Q Mr. Prairie, we're still on Exhibit 1050. No 11:03:33
5 figure of Exhibit 1050 shows a seat being 11:03:36
6 removed and reinstalled facing the opposite 11:03:39
7 direction, correct? 11:03:42
8 A I guess I would say like Figure 12 you're going 11:03:56
9 to see an alternate, two seats facing forward. 11:03:59
10 Figure 9 and 10 show one seat in one direction 11:04:03
11 and one facing the opposing direction. 11:04:09
12 Q But no seats show a seat being removed and 11:04:16
13 reinstalled facing the opposite direction, 11:04:19
14 correct? 11:04:22
15 A I guess I would -- the document shows the seats 11:04:28
16 in multiple directions, like particularly the 11:04:30
17 front seat is shown in a both forward and 11:04:34
18 reverse configuration. 11:04:36
19 This isn't an instruction how-to 11:04:41
20 video manual. It shows different 11:04:43
21 configurations, so there's pictures with 11:04:45
22 different seat configurations within the patent 11:04:48
23 document. 11:04:51
24 Q Whether the hubs contain internal keying is not 11:04:57
25 visible in Figure 9, is it? 11:05:01

1 A Figure 9 does not disclose full details of the 11:05:20
2 inner workings of that hub. 11:05:23

3 Q It doesn't disclose any inner workings of that 11:05:26
4 hub, does it? 11:05:29

5 A Figure 9, from what I could gather, does not 11:05:42
6 show inner workings of that hub. 11:05:44

7 (Exhibit 1001-1140 was marked for 11:05:46
8 identification.) 11:05:46

9 BY MR. THOMAS: 11:05:46

10 Q Now, if you would, I'm going to ask you to pull 11:05:50
11 up your rebuttal declaration and your original 11:05:56
12 declaration for the '771 patent. 11:06:00

13 So in the marked exhibits 11:06:07
14 folder, I think that's Exhibit -- EX1001-1140. 11:06:09

15 Do you have both of those handy? 11:06:36

16 A I have a '771 declaration and my rebuttal 11:06:39
17 declaration in front of me. 11:06:43

18 Q Paragraph 21 of your rebuttal declaration which 11:06:47
19 is page 17, do you see that? 11:06:51

20 A I see paragraph 21 of my rebuttal. 11:07:04

21 Q And here your rebuttal declaration states you, 11:07:08
22 quote, opined as an alternative that it would 11:07:10
23 have been obvious to reverse the seats of 11:07:12
24 Rolicki between forward-facing and rear-facing 11:07:15
25 configurations. 11:07:18

1 Did I read that correctly? 11:07:20

2 A Yes, you did. 11:07:24

3 Q And that paragraph in your rebuttal declaration 11:07:25

4 cites paragraph 312 of your first declaration, 11:07:29

5 correct? 11:07:32

6 A Yes, it does. 11:07:36

7 Q Let's go to paragraph 312 of Exhibit 1001 in 11:07:37

8 the 1140 IPR. Let me know when you're there. 11:07:40

9 A I am at paragraph 312. 11:07:54

10 Q Point to or tell me where to find the words, 11:07:56

11 quote, reverse the seats in this paragraph 312? 11:07:59

12 A I'll read the paragraph. It doesn't -- let me 11:08:29

13 read the paragraph for the record -- 11:08:32

14 Q Mr. Prairie, we do not -- your testimony is 11:08:35

15 already in the record. We do not need it in 11:08:37

16 the record. 11:08:40

17 I'm asking you if the words 11:08:40

18 "reverse the seats" appear in that testimony. 11:08:42

19 It's a yes-or-no question. 11:08:47

20 A It says we can configure the seats in both a 11:08:49

21 rearward and -- forward and rear reverse 11:08:52

22 fashion, so the intent is the same, yes. Both 11:08:55

23 forward-facing and rear-facing fashion. 11:08:59

24 Q But the words "reverse the seats" don't appear 11:09:03

25 in that paragraph, correct? 11:09:05

1 A As a POSITA would understand, the seat 11:09:10
2 connectors would be similar to allow the seats 11:09:12
3 to be connectible in both a forward and reverse 11:09:14
4 fashion. 11:09:18

5 This is not surprising because 11:09:18
6 strollers and connectors that permit the seat 11:09:19
7 orientation to be reversed were common and 11:09:22
8 known as to POSITA at the time of the 11:09:24
9 invention. 11:09:26

10 Q Paragraph 21 of your rebuttal declaration you 11:09:34
11 said the words -- you used the words it would 11:09:36
12 be obvious -- would have been obvious to 11:09:38
13 reverse the seats, correct? 11:09:40

14 A Yes. I believe that paragraph 312 of my 11:09:46
15 original declaration has the same intent, that 11:09:49
16 it was -- the seats were reconfigurable and 11:09:53
17 that it would have been obvious to a POSITA to 11:09:56
18 be able to do that. 11:09:58

19 Q Paragraph 312 of Exhibit 1001 does not identify 11:09:59
20 or describe any modification to Rolicki's seat 11:10:03
21 mounts, correct? 11:10:07

22 A Please restate your question. 11:10:11

23 Q Paragraph 312 of Exhibit 1001 does not identify 11:10:31
24 any modification to Rolicki's seat mounts, 11:10:34
25 right? 11:10:38

1 A "Rolicki based upon the reference discloses a 11:10:45
2 similar seat connector and seats connectible to 11:10:49
3 the rear-facing configuration. This reference 11:10:52
4 discloses stroller embodiments like that in 11:10:54
5 Rolicki as well as other stroller designs. 11:10:58
6 POSITA understood the seat connectors would be 11:10:59
7 similar and allow the seats to be connectible 11:11:02
8 in both a forward and reverse fashion." 11:11:04

9 Q Mr. Prairie, you just read the testimony from 11:11:10
10 Exhibit 1001, and that's not what I asked you 11:11:13
11 to do. 11:11:15

12 I asked you to identify -- to 11:11:16
13 tell me whether or not paragraph 312 identifies 11:11:18
14 a modification of Rolicki's seat mounts. And 11:11:22
15 it does not, correct? 11:11:28

16 A Paragraph 312 does not describe modifications. 11:11:30
17 I just want to read -- give me just -- 11:11:35

18 Q You've answered -- that's the answer. Thank 11:11:39
19 you. 11:11:40

20 And paragraph 312 does not state 11:11:41
21 any reason a POSITA would install Rolicki seats 11:11:43
22 facing rearward, correct? 11:11:47

23 A Well, there's additional paragraphs leading up 11:11:58
24 to and after that paragraph that are -- support 11:12:00
25 that, so you're extracting one paragraph out of 11:12:04

1 a multi 100-page document. 11:12:06

2 Q We're talking about the paragraph that your 11:12:10
3 rebuttal declaration pointed to, correct? 11:12:12

4 A But it cites the whole -- my first declaration 11:12:16
5 is citing the -- it's citing that section of it 11:12:21
6 where it's focused on, but then there's 11:12:25
7 additional content leading up to and afterwards 11:12:28
8 supporting that paragraph. 11:12:30

9 Q And that content -- there is nothing in this 11:12:32
10 Exhibit 1001 discussion of Rolicki that states 11:12:37
11 a reason that Rolicki -- let me strike that. 11:12:40

12 And there's nothing in this 11:12:44
13 discussion of Rolicki that states a reason a 11:12:47
14 POSITA would install Rolicki's seat facing 11:12:50
15 rearward, would it -- does it? 11:12:53

16 A At the time of this, a POSITA would understand 11:13:00
17 that seats configured in both a forward and 11:13:04
18 rear-facing configuration were common, so 11:13:06
19 wouldn't necessarily need the document to tell 11:13:10
20 you that that was a POSITA at that time would 11:13:11
21 understand that. 11:13:13

22 Q Let's go back to your rebuttal declaration. 11:13:16
23 Paragraph 25. You testified -- it states, "It 11:13:20
24 would have been obvious to have the first seat 11:13:36
25 being connectible to the frame in either a 11:13:38

1 forward or backward-facing position to form the 11:13:40

2 single seat configuration in view of Rolicki." 11:13:43

3 Did I read that correctly? 11:13:49

4 A Yes, you did. 11:13:52

5 Q So my question is what specific physical change 11:13:54

6 to Rolicki's stroller, if any, does that 11:13:59

7 opinion require? 11:14:02

8 A They would already be able to be reversible. 11:14:23

9 Q Rolicki never states that its seats can be 11:14:28

10 installed rear facing, correct? 11:14:32

11 A It shows the seats. It doesn't -- it 11:14:37

12 specifically shows it. Figure 9 shows a 11:14:39

13 rearward facing seat and Figure -- and a 11:14:42

14 forward-facing seat and subsequent to other 11:14:45

15 images show forward facing as well. So that 11:14:48

16 document shows both forward and rearward-facing 11:14:51

17 seats. 11:14:54

18 (Exhibit 1047 was marked for 11:14:54

19 identification.) 11:14:54

20 Q And by "that document," you're actually 11:14:54

21 referring to Exhibit 1050, not Rolicki 11:14:57

22 Exhibit 1047, correct? 11:15:01

23 A The previous line of questions in regards to 11:15:23

24 1050. Let's pull up 1047, and we can review 11:15:26

25 that since you've -- 11:15:30

1 Q That was the question I was asking. That 11:15:32
2 Rolicki, the document, Exhibit 1047, never 11:15:33
3 states its seats can be installed rear facing, 11:15:36
4 correct? 11:15:40

5 So you can look through 11:15:41
6 Exhibit 1047. We've already covered 1050. Now 11:15:42
7 I'm asking questions about 1047. 11:15:46

8 A 1047 encompasses all the content of 1050. 11:15:48

9 Q Okay. 1047 itself, the figures never show a 11:15:52
10 seat facing backward, correct? 11:15:58

11 A Well, all the content of 1047 encompasses 11:16:02
12 everything of 1050, so they're really the same 11:16:05
13 document. 11:16:08

14 Q Figures 1 through 29 of Exhibit 1047, none of 11:16:14
15 them show a seat installed rear facing, do 11:16:22
16 they? 11:16:26

17 (Witness peruses document.) 11:16:51

18 THE WITNESS: Figures within 1047 11:17:41
19 show forward-facing configurations. I'm going 11:17:43
20 to reference the text to see if there's a 11:17:48
21 description of alternate configurations there. 11:17:50

22 BY MR. THOMAS: 11:17:54

23 Q I asked about the figures, so that's -- you've 11:17:54
24 answered the question. 11:17:56

25 Let's turn back to Exhibit 1001 11:17:58

1 in the 1140 IPR, the version of the declaration 11:18:02
2 you just had open. 11:18:04

3 A I'm back in 1001. 11:18:16

4 Q Okay. I'm going to ask about the limitation 11:18:18
5 1.3, which I believe you've reproduced in full 11:18:21
6 on page 3 of your declaration because that has 11:18:24
7 all the claim language. 11:18:33

8 Do you see that? 11:18:38

9 A What are we looking at again? 11:18:40

10 Q Exhibit 1001 in the 1140 IPR, page 3. 11:18:42

11 A I think we're on a different page. Page 3 is 11:18:51
12 the index. 11:18:54

13 Q The table of contents? 11:18:57

14 A Yeah, there's a table of contents. 11:18:58

15 Q Right, that's what I'm directing you to. Thank 11:19:00
16 you. Claim Element 1.3. The end of the last 11:19:02
17 clause of that is that "The foldable support 11:19:08
18 members extending in a parallel spaced 11:19:13
19 relationship and substantially within a plane 11:19:15
20 that runs diagonally from the handle portion 11:19:17
21 towards the front end portion of the frame." 11:19:20

22 Did I read that correctly? 11:19:22

23 A You're reading just from the index, is that -- 11:19:27

24 Q I'm reading the claim language. Is that the 11:19:30
25 claim language as reproduced in your 11:19:33

1 declaration? 11:19:36

2 A Reread that. I wanted to make sure I can read 11:19:47

3 it word-for-word again. 11:19:51

4 Q I'll move on and ask a different question. 11:19:55

5 Claim 1 uses the phrase 11:19:58

6 "substantially within a plane." It does not 11:19:59

7 recite exactly within a plane, correct? 11:20:02

8 A You're referring to Claim 1 of which patent, 11:20:09

9 '771? 11:20:12

10 Q Yes. 11:20:13

11 A Okay. I have '771 hard copy in front of me. 11:20:14

12 I'm going to read the claim. 11:20:20

13 Q Good. 11:20:21

14 (Witness peruses document.) 11:20:22

15 BY MR. THOMAS: 11:20:26

16 Q This is Limitation 1.3 which you just had open 11:20:27

17 in front of you and the table of contents of 11:20:30

18 Exhibit 1001. 11:20:33

19 A Okay. So ask your question again. 11:20:36

20 Q Claim 1 recites substantially within a plane. 11:20:38

21 It does not recite exactly within a plane, 11:20:42

22 correct? 11:20:44

23 A Claim 1 references the term "substantially 11:21:00

24 within a plane." 11:21:01

25 Q A frame member -- strike that. 11:21:03

1 A frame whose members lie 11:21:06
2 exactly in a plane also lies substantially 11:21:08
3 within that plane, correct? 11:21:11

4 A Provide more detail to your situation. 11:21:20

5 Q If you have a stroller whose left and right -- 11:21:24
6 that has left and right foldable support 11:21:29
7 members and those foldable support members lie 11:21:32
8 exactly in a plane, then they would also lie 11:21:35
9 substantially within that plane, correct? 11:21:39

10 MR. CUNNINGHAM: Objection. 11:21:45
11 Incomplete hypothetical. 11:21:45

12 THE WITNESS: Could you point to a 11:21:54
13 certain situation or image, Mr. Thomas? 11:21:54

14 BY MR. THOMAS: 11:21:58

15 Q I'm going to rely on your expertise here, 11:21:59
16 Mr. Prairie. You've identified various 11:22:01
17 strollers, and so I'm asking you if you have 11:22:07
18 legs of a stroller, which the patent claims 11:22:10
19 refer to as support members, you have legs of a 11:22:14
20 stroller that lie exactly in the same plane, it 11:22:18
21 would also lie substantially within that plane, 11:22:20
22 correct? 11:22:22

23 MR. CUNNINGHAM: Object to form. 11:22:25
24 Mischaracterizes the claim. 11:22:26

25 THE WITNESS: I guess I would have to 11:22:30

1 see the specific situation you're referring to 11:22:31

2 to give you a definitive answer. 11:22:33

3 BY MR. THOMAS: 11:22:43

4 Q I'll direct your attention to paragraph 205 of 11:22:44

5 Exhibit 1001 in the 1140 IPR, your declaration 11:22:48

6 as to the '771 patent. 11:22:53

7 A What page? 11:22:54

8 Q It is page 120. 11:22:56

9 A I'm on page 120. 11:23:08

10 Q You identify there a figure depicting a 11:23:10

11 stroller with frame members and a strictly 11:23:15

12 planar relationship, correct? 11:23:18

13 MR. CUNNINGHAM: I'm going to object. 11:23:23

14 Outside the scope. 11:23:24

15 THE WITNESS: Yeah, I didn't do a 11:23:26

16 full review of this, so I'd have to go back and 11:23:27

17 refresh my memory of this section of the 11:23:29

18 document to know what you're talking about. 11:23:31

19 BY MR. THOMAS: 11:23:46

20 Q You testified in your rebuttal declaration 11:23:47

21 about whether or not Figure 10 of the '771 11:23:48

22 patent provides written description support for 11:23:55

23 the phrase "substantially within a plane." 11:23:57

24 Do you recall that? 11:23:59

25 MR. CUNNINGHAM: Objection. Form. 11:24:03

1 THE WITNESS: Well, my rebuttal 11:24:06
2 declaration, yes, we have some discussion in 11:24:08
3 regards to your expert witnesses Figure 10, the 11:24:10
4 annotated version of it. We have discussion 11:24:15
5 regarding her interpretation, Dr. Cameron's. 11:24:18

6 BY MR. THOMAS: 11:24:22

7 Q Okay. And your testimony at paragraph 205 of 11:24:23
8 Exhibit 1001 as to the '771 patent describes a 11:24:28
9 figure from the first provisional application 11:24:37
10 and you describe it, your words, as strictly as 11:24:40
11 depicting a frame in a strictly planar 11:24:44
12 relationship. 11:24:46

13 Did I read that correctly? Do 11:24:48
14 you see that? 11:24:50

15 MR. CUNNINGHAM: I'm going to object. 11:24:51
16 Outside the scope of this deposition. 11:24:52

17 BY MR. THOMAS: 11:24:56

18 Q You may answer. 11:24:57

19 A Yeah. I believe I was instructed that we are 11:25:00
20 focused on the content of the rebuttal 11:25:03
21 declaration, not on the '771 declaration. 11:25:05

22 Q I understand that. I'm asking you about this 11:25:09
23 testimony, and Mr. Cunningham can object, and 11:25:11
24 those objections will be resolved later, but 11:25:17
25 you need to answer the question. 11:25:19

1 A Can you point to where the content is in my 11:25:23
2 rebuttal discussion -- 11:25:25

3 Q I'm asking you about paragraph 205 of your 11:25:28
4 declaration where you state "The figures of the 11:25:31
5 first provisional depict the frame 12 or 81 in 11:25:34
6 a strictly planar relationship with the plane 11:25:37
7 indicated by a purple line running diagonally 11:25:40
8 from the top of the handle portion toward the 11:25:44
9 front end." 11:25:45

10 Did I read that correctly? 11:25:47

11 MR. CUNNINGHAM: Objection. Outside 11:25:48
12 the scope. 11:25:48

13 THE WITNESS: You had seven hours of 11:25:50
14 my time on this already, Warren. We're focused 11:25:51
15 on the rebuttal declaration today. 11:25:53

16 BY MR. THOMAS: 11:25:56

17 Q Mr. Prairie, did I read paragraph 205 11:25:56
18 correctly? 11:26:00

19 MR. CUNNINGHAM: Objection. Outside 11:26:00
20 the scope. 11:26:01

21 THE WITNESS: Point to where that 11:26:03
22 content is in my rebuttal declaration, and we 11:26:04
23 can have some questioning along it. 11:26:06

24 BY MR. THOMAS: 11:26:08

25 Q I'm going to object to your refusal to answer 11:26:09

1 the question, but I will go back to the 11:26:15
2 question that I asked you earlier. 11:26:18

3 A frame whose members lie 11:26:23
4 exactly in a plane also lie substantially 11:26:26
5 within that plane, correct? 11:26:29

6 MR. CUNNINGHAM: Objection. 11:26:35
7 Incomplete hypothetical. 11:26:35

8 THE WITNESS: Provide the situation 11:26:39
9 that you're referring to, Mr. Thomas, versus a 11:26:41
10 vague question. 11:26:47

11 BY MR. THOMAS: 11:26:48

12 Q Okay. I'll direct your attention to 11:26:48
13 Exhibit 1001 in the 1140 IPR, paragraph 205. 11:26:50

14 Please read that paragraph 11:26:57
15 silently in your head and tell me if it 11:27:00
16 refreshes your recollection about what type of 11:27:02
17 situation you might have with a frame whose 11:27:07
18 members lie exactly in a plane. 11:27:11

19 MR. CUNNINGHAM: Objection. Outside 11:27:13
20 the scope. 11:27:14

21 MR. THOMAS: Ms. Lahti, could you 11:28:11
22 reread the question, please? 11:28:11

23 (Record read.) 11:28:12

24 MR. CUNNINGHAM: Objection. Form, 11:28:33
25 and objection outside the scope. 11:28:33

1 THE WITNESS: In my rebuttal 11:28:41
2 declaration I believe there's only one figure 11:28:43
3 shown that was created by Dr. Cameron. If 11:28:44
4 you'd like to cite that figure, we can. We can 11:28:49
5 have a discussion around that one. 11:28:51

6 MR. THOMAS: Move to strike as 11:28:53
7 unresponsive. 11:28:53

8 BY MR. THOMAS: 11:29:01

9 Q In your rebuttal declaration, paragraph ten -- 11:29:02
10 do you have that in front of you? 11:29:03

11 A I have paragraph ten of my rebuttal declaration 11:29:23
12 in front of me. 11:29:25

13 Q Okay. You say, "In my first declaration for 11:29:27
14 the '682 patent, I opine that Figure 10 of Liao 11:29:28
15 disclose Claim Limitation 1.8. 11:29:32

16 So your testimony here is that 11:29:43
17 you opine that Figure 10 discloses that 11:29:44
18 limitation, correct? 11:29:46

19 A Yes. I show further on -- right below 11:30:00
20 paragraph 14, I show Figure 10, an annotated 11:30:03
21 version of Figure 10. 11:30:08

22 Q And in paragraph 11 you state that Figures 5 11:30:10
23 and 11, quote, are not figures that I relied 11:30:17
24 upon in my analysis, end quote. 11:30:19

25 Did I read that quoted portion 11:30:21

1 correctly? 11:30:23

2 A Yes, you did. 11:30:25

3 Q So for Limitation 1.8, you relied on Figure 10 11:30:27

4 alone, correct? 11:30:30

5 A Figure 10 was definitely a key component of 11:30:40

6 that position, yes. 11:30:43

7 Q But apparently not Figures 5 or 11, correct? 11:30:48

8 A Figure 5 doesn't show any seats installed. 11:30:56

9 Figure 11 is an alternate configuration. 11:31:01

10 Q You state that those are not figures that you 11:31:05

11 relied upon in your analysis. That's what you 11:31:07

12 just said, right? 11:31:10

13 A The part of Liao, but Figure 10 is the one that 11:31:13

14 effectively shows it in line descending 11:31:18

15 configuration. 11:31:21

16 Q Are you withdrawing your testimony in paragraph 11:31:22

17 11 that Figures 5 and 11 are not figures that 11:31:24

18 you relied upon in your analysis? 11:31:27

19 MR. CUNNINGHAM: Objection. 11:31:30

20 Mischaracterizes the testimony. 11:31:30

21 THE WITNESS: I relied on Olive 11:31:34

22 Liao -- in looking through it, Figure 10 is 11:31:37

23 what I relied on for this specific position. 11:31:41

24 BY MR. THOMAS: 11:31:44

25 Q Paragraph 13, last sentence, "I maintain what I 11:31:48

1 stated in my deposition that a POSITA would 11:31:57
2 look at the relative positioning of the seats 11:31:59
3 when analyzing Claim Limitation 1.8." 11:32:02

4 Did I read that correctly? 11:32:05

5 A Yes, you did. 11:32:09

6 Q And you agree that Figure 11 is a 11:32:16
7 horizontal-type configuration or depicts a 11:32:19
8 horizontal type configuration? 11:32:22

9 MR. CUNNINGHAM: Objection. Form. 11:32:27

10 THE WITNESS: Figure 11 shows Liao 11:32:32
11 with two forward facing child seats of the same 11:32:35
12 style. 11:32:40

13 BY MR. THOMAS: 11:32:46

14 Q And those are installed at the same vertical 11:32:47
15 level, correct, in Figure 11? 11:32:49

16 A I don't know if I made that position or not. 11:32:59
17 They are both of similar seats in the 11:33:01
18 forward-facing configuration. 11:33:03

19 Q You have reproduced an annotated version of 11:33:06
20 Figure 11 in your declaration here. 11:33:10

21 Aren't those seats level with 11:33:16
22 one another? 11:33:18

23 A In that configuration, they're pretty close to 11:33:24
24 being horizontal, yes. 11:33:29

25 Q Figure 10 and Figure 11 of Liao show the same 11:33:31

1 stroller frame, correct? 11:33:35

2 A It's my understanding that, yes, Figure 10 and 11:33:44

3 11 use the same base stroller frame but show 11:33:46

4 alternate seat configurations and orientations. 11:33:50

5 Q So it's really -- the difference between Figure 11:33:56

6 10 and 11 is what's mounted onto the frame, 11:33:59

7 right? 11:34:03

8 A Figure 10 and 11 shows alternate seat 11:34:07

9 configurations or seat types and 11:34:10

10 configurations. 11:34:14

11 Q And that's the only difference between the two 11:34:15

12 figures is what is mounted onto the frame, 11:34:18

13 correct? 11:34:21

14 A I believe some of the seats have different 11:34:31

15 adapters too. It depends on the type of seat 11:34:33

16 that's used. There's different adapter 11:34:35

17 configurations as well. 11:34:38

18 MR. THOMAS: Ms. Lahti, can you read 11:34:44

19 back the answer to that question? 11:35:04

20 (Record read.) 11:35:06

21 BY MR. THOMAS: 11:35:10

22 Q The forward and rearward mounting arms in 11:35:12

23 Figure 10 are the same arms that are shown in 11:35:14

24 Figure 11, correct? 11:35:17

25 MR. CUNNINGHAM: Objection to form. 11:35:25

1 THE WITNESS: I'm not quite fully -- 11:35:29
2 point to what you mean by "arms" in that -- 11:35:32
3 just so I make sure I understand what you 11:35:37
4 meant. 11:35:39

5 BY MR. THOMAS: 11:35:49

6 Q Let me see if I can locate -- if you look at 11:35:49
7 your annotated Figure 10 on page 14 of your 11:35:57
8 rebuttal declaration, 1082. 11:36:05

9 A Okay. I'm on page 14 of my rebuttal. 11:36:14

10 Q When I'm referring to the arm, I'm referring to 11:36:16
11 the structure of the cube highlighted in yellow 11:36:20
12 on the front side of the stroller. And then I 11:36:26
13 guess also the uncolored white structure 11:36:30
14 between the highlighted red and the highlighted 11:36:38
15 blue. 11:36:41

16 Do you understand? 11:36:49

17 MR. CUNNINGHAM: Does that include 11:36:49
18 the wheel? 11:36:50

19 MR. THOMAS: No. The thing that 11:36:53
20 would be -- that's a mounting -- 11:36:54

21 BY MR. THOMAS: 11:36:57

22 Q Or another way to describe it would be in the 11:36:58
23 annotated Figure 11 on page 12 of your 11:37:00
24 declaration, the mounting or mounting arms 11:37:04
25 would be the thing that the red line is drawn 11:37:16

1 through the top of also on Figure 5. 11:37:18

2 A You kind of hung me up. I don't understand 11:37:29

3 your question, Mr. Thomas. Because there's 11:37:31

4 connectors, but I'm not sure what you mean 11:37:37

5 by -- there's a different configuration. The 11:37:41

6 two seats have different setups. 11:37:45

7 Q Let me ask a different question. If two 11:38:24

8 identical seats are mounted onto a stroller 11:38:38

9 shown in Figure 10, the same seat model on 11:38:41

10 each, the two seats would sit at the same 11:38:44

11 height, correct? 11:38:47

12 MR. CUNNINGHAM: Objection. 11:38:51

13 Incomplete hypothetical. 11:38:51

14 THE WITNESS: That's not what Figure 11:38:59

15 10 shows, so I don't know for sure. 11:39:00

16 BY MR. THOMAS: 11:39:04

17 Q Understood. Figure 10 shows a bassinet. But 11:39:05

18 my question is, the one that I asked, if you 11:39:08

19 took two identical seats mounted onto the frame 11:39:10

20 in Figure 10, those two identical seats would 11:39:15

21 sit at the same height, correct? 11:39:19

22 MR. CUNNINGHAM: Objection. 11:39:23

23 Incomplete hypothetical. 11:39:23

24 THE WITNESS: I guess that's not what 11:39:27

25 Figure 10 shows, so I can't tell you for sure 11:39:28

1 on that one. 11:39:31

2 BY MR. THOMAS: 11:39:44

3 Q It is what Figure 11 shows, though, correct, 11:39:46

4 two identical seats mounted onto the same 11:39:48

5 stroller frame? 11:39:52

6 MR. CUNNINGHAM: Objection. Form. 11:39:58

7 THE WITNESS: Figure 11 shows two 11:40:02

8 similar seats of -- in the same direction. 11:40:03

9 BY MR. THOMAS: 11:40:15

10 Q And those two seats are at the same height, 11:40:15

11 correct? 11:40:17

12 A They're of similar height, yes. 11:40:24

13 Q And if you took those two seats depicted in 11:40:27

14 Figure 11 and put them onto the stroller frame 11:40:31

15 that is depicted in Figure 10, they -- those 11:40:34

16 two identical stroller seats would sit at the 11:40:39

17 same height, correct? 11:40:42

18 MR. CUNNINGHAM: Objection. 11:40:43

19 Incomplete hypothetical. 11:40:43

20 THE WITNESS: I can't say for sure. 11:40:49

21 BY MR. THOMAS: 11:40:53

22 Q Go to paragraph 15 of your rebuttal 11:40:54

23 declaration. 11:40:56

24 A Page or paragraph? 11:41:02

25 Q Paragraph 15. 11:41:03

1 A Okay. 11:41:04

2 Q About halfway down you say that the Figure 10 11:41:06

3 arrangement is, "Analogous to a tier seating 11:41:11

4 geometry, i.e., stadium seating, in which the 11:41:15

5 rear seating position is elevated relative to 11:41:20

6 the former seating position." 11:41:22

7 Did I read that correctly? 11:41:24

8 A You extracted different portions, but there is 11:41:31

9 discussions around stadium seating. I didn't 11:41:33

10 catch exactly where you started within that 11:41:36

11 paragraph. 11:41:37

12 Q The upper unit, as you label it, identify it, 11:41:40

13 in Figure 10 is a bassinet, correct? 11:41:44

14 A Within Figure 10, that particular seat is a 11:41:53

15 bassinet configuration. 11:41:55

16 Q And the bassinet has a different body shape 11:41:57

17 than an upright stroller seat, correct? 11:41:59

18 A The bassinet is different than an upright seat, 11:42:05

19 correct. 11:42:09

20 Q The red line in your paragraph 14 shown at the 11:42:10

21 top of page 13 runs along the bottoms of the 11:42:14

22 two units, correct? 11:42:19

23 A I guess it runs along probably maybe where the 11:42:31

24 center of the child would be. 11:42:34

25 Q In paragraph 14 you say that is the bottom of 11:42:37

1 both seats shown in red, right? 11:42:40

2 A Okay. I can double-check that. Which 11:42:43

3 paragraph are you referring to again? 11:42:54

4 Q Paragraph 14, the red line runs along the 11:42:56

5 bottoms of the two units of both seats. 11:42:59

6 A Oh, yeah, okay. Yep, shown in blue. 11:43:05

7 Q And the blue line runs across the tops, 11:43:08

8 correct? 11:43:12

9 A Yeah, the blue -- the height offsets -- yeah, 11:43:31

10 is along the top of -- shows the offset of the 11:43:34

11 tops of them. 11:43:38

12 Q And both of those lines are lines you drew for 11:43:39

13 this proceeding either a Pierce and Liao 11:43:41

14 itself, correct? 11:43:47

15 A Yes, that's an annotated figure. 11:43:48

16 Q Paragraph 17, turn to that. Paragraph 17 adds, 11:43:51

17 quote, further reference lines through the 11:43:58

18 seats. 11:44:00

19 Do you see that testimony? 11:44:02

20 A I do. 11:44:07

21 Q Each of those lines that you've illustrated in 11:44:08

22 paragraph 17, those run through the seat 11:44:12

23 bodies, the bassinet body and the seat body, 11:44:15

24 correct? 11:44:19

25 A Yes, that runs through the bassinet and through 11:44:27

1 the seat. 11:44:29

2 Q And Liao is a design patent, so it contains no 11:44:31

3 written description of the heights of the 11:44:34

4 seats, correct? 11:44:35

5 A Yes. Liao is a design patent. 11:44:39

6 Q And it contains no written description of the 11:44:42

7 seat's heights, correct? 11:44:45

8 A The seats are -- it's more pictorial claims. 11:44:49

9 Q If you look back at that figure showing the 11:44:58

10 height offset as you've called it, the top of 11:45:00

11 page 13 -- 11:45:03

12 A Yes. 11:45:07

13 Q -- the tops and bottoms of your red and blue 11:45:07

14 lines connect -- connect to surfaces of the 11:45:10

15 bassinet body and the seat body, correct? 11:45:15

16 MR. CUNNINGHAM: Objection. Form. 11:45:21

17 THE WITNESS: The height offset is 11:45:26

18 showing the bottom of the seat and the bottom 11:45:27

19 of the bassinet, and then ultimately the blue 11:45:29

20 lines are showing the top of the bassinet and 11:45:35

21 the top of the seat. 11:45:36

22 BY MR. THOMAS: 11:45:39

23 Q So all these lines are connecting and 11:45:40

24 illustrating differences in surfaces of the 11:45:42

25 bassinet body and the seat body, not surfaces 11:45:45

1 of the frame, correct? 11:45:50

2 MR. CUNNINGHAM: Warren, could you 11:45:54

3 repeat that? I missed the last two words. 11:45:55

4 BY MR. THOMAS: 11:45:58

5 Q I said that the red and blue lines connect 11:45:58

6 surfaces of the bassinet body and the seat 11:46:02

7 body, not surfaces of the frame, correct? 11:46:05

8 A They are referencing the seats themselves. 11:46:12

9 Q In paragraph 18 of your rebuttal declaration, 11:46:21

10 generally paragraphs 18 to 20 of your rebuttal 11:46:30

11 declaration describe an intermediary connector, 11:46:33

12 "disposed between the lower connector and the 11:46:35

13 seat connector," in Figure 10. 11:46:39

14 Did I read that correctly from 11:46:42

15 paragraph 18? 11:46:45

16 A Where are you starting to read at? 11:46:48

17 Q Paragraph 18 says, "In the bassinet embodiment 11:46:50

18 of Figure 10, an intermediary connector is 11:46:55

19 disposed between the lower connector and the 11:46:58

20 seat connector." 11:47:00

21 Did I read that correctly? 11:47:04

22 A Yes, you did. 11:47:05

23 Q And that intermediary connector is shown in the 11:47:06

24 bassinet embodiment of Figure 10, your words, 11:47:11

25 correct? 11:47:15

1 A Yes, it is. 11:47:15

2 (Exhibit 1048 was marked for 11:47:16

3 identification.) 11:47:16

4 BY MR. THOMAS: 11:47:16

5 Q Can you pull up Liao Figure 11. That's 11:47:20

6 Exhibit 1048. It might help to have them 11:47:28

7 side-by-side. 11:47:32

8 A I have Liao up. Which figure do you want up? 11:47:38

9 Q Figure 11 of Liao. 11:47:42

10 A Okay. I have Figure 11 up. 11:47:44

11 Q Can you point to the intermediary connector in 11:47:50

12 Figure 11? 11:47:54

13 A It's my understanding intermediary connector is 11:48:03

14 used with the bassinet sometimes. 11:48:05

15 Q Figures 1 through 7 and 11 through 13 do not 11:48:11

16 show the component that you labeled an 11:48:14

17 intermediary connector, do they? 11:48:16

18 A My rebuttal has identified it within Figure 10 11:48:23

19 within the bassinet when the bassinet is used. 11:48:27

20 Q And that intermediary connector you identify 11:48:45

21 arrives with the bassinet unit. 11:48:48

22 It's shown in Figure 10 with the 11:48:51

23 bassinet installed, correct? 11:48:53

24 A Figure 10 shows the bassinet installed and has 11:49:00

25 an intermediate connector. 11:49:03

1 Q And in your original testimony you did not 11:49:06
2 identify any intermediary connector in your 11:49:09
3 testimony with the petition, did you? 11:49:15

4 A I don't recall if I did or did not. 11:49:20

5 Q In paragraph 19 of your rebuttal declaration, 11:49:24
6 you wrote, "The intermediary connector, quote, 11:49:30
7 has a lower detent that releasably couples to 11:49:33
8 the lower connector and an upper detent that 11:49:36
9 couples to the seat connector." 11:49:39

10 Did I read that correctly? 11:49:41

11 A Yes, you did. 11:49:42

12 Q So in that assembly, which component is the 11:49:44
13 seat attachment adapter as recited in the 11:49:47
14 claim? 11:49:52

15 A Ask your question again, Mr. Thomas. 11:50:02

16 Q In that assembly, which component is the seat 11:50:05
17 attachment adapter recited in the claims? 11:50:12

18 MR. CUNNINGHAM: Objection. Outside 11:50:17
19 the scope. 11:50:17

20 THE WITNESS: I believe it's the seat 11:50:38
21 connector itself on the bassinet, so the 11:50:39
22 connection point is different. 11:50:51

23 MR. THOMAS: Can we go off the record 11:50:57
24 for a second? 11:50:58

25 (Discussion off the record.) 11:51:00

1 (Lunch recess taken from 11:51 a.m. 11:51:54
2 to 12:32 p.m.) 12:32:42
3 BY MR. THOMAS: 12:32:42
4 Q Mr. Prairie, please turn to paragraph 29 of 12:32:49
5 your rebuttal declaration, Exhibit 1082. 12:32:52
6 A Okay. I'm at paragraph 29 of 1082. 12:33:05
7 Q Here this paragraph is talking about a passage 12:33:09
8 of Offord '341, column nine, lines 37 to 52. 12:33:13
9 And you state, "This passage discusses the 12:33:19
10 adjustment of the interface components which is 12:33:22
11 not something I relied upon in my first 12:33:26
12 declaration." 12:33:28
13 Did I read that correctly? 12:33:29
14 A Yeah, but I believe it's 945 through 52. 12:33:32
15 Q Thank you, sorry. I don't know where I got 12:33:36
16 that, but I appreciate that clarification. 12:33:40
17 Paragraph 30 then discusses the 12:33:43
18 same passage, right, the same passage of Offord 12:33:46
19 '341? 12:33:51
20 A Yes. 12:33:56
21 Q And if you flip down to paragraph 50, you again 12:33:57
22 quote that passage, correct? 12:34:08
23 A Yes. 12:34:14
24 Q Now, back up to paragraph 30, here you say in 12:34:21
25 the third line, "These paragraphs are silent on 12:34:29

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1 |         reversibility." 12:34:33
```

2	Did I read that correctly?	12:34:34
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3	A	Yes, you did.	12:34:37
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4 Q And the adjustments that the passage quoted -- 12:34:40

```
5 |         block quoted in your declaration, the 12:34:47
```

6	adjustments that are described in that passage	12:34:52
---	--	----------

```
7 | describe changes to the distance, horizontal or 12:34:55
```

8	vertical, between the connector sockets 106,	12:34:58
---	--	----------

9	correct?	12:35:01
---	----------	----------

10	A	Restate the question.	12:35:26
----	---	-----------------------	----------

11	Q	The quoted passage describes changes to the	12:35:28
----	---	---	----------

```
12 horizontal -- describes -- sorry. Let me start 12:35:35
```

13 over . 12:35:41

14	The quoted passage describes	12:35:41
----	------------------------------	----------

15	changes to the distance between the connector	12:35:43
----	---	----------

16	sockets 106, correct?	12:35:45
----	-----------------------	----------

17	A	Yes. It describes the telescoping-type feature	12:35:51
----	---	--	----------

18	to change the horizontal distance between the	12:35:53
----	---	----------

```
19 connector sockets 106 of each component. 12:35:55
```

20	Q	Or the vertical distance, correct?	12:35:58
----	---	------------------------------------	----------

21	A	Yes, a vertical distance can also be adjusted	12:36:01
----	---	---	----------

22	as well.	12:36:04
----	----------	----------

23	Q	And the passage ends, as quoted in your	12:36:04
----	---	---	----------

24	declaration, "The adjustments must be kept	12:36:08
----	--	----------

25 within safe limits such that the child-carrying 12:36:11

1 units remain as close to the center of gravity 12:36:14
2 of the vehicle two as possible to prevent any 12:36:17
3 possibility of dangerous tilting or toppling 12:36:23
4 over of the vehicle two." 12:36:25

5 Did I read that passage of 12:36:27
6 Offord correctly? 12:36:29

7 A Yes. The adjustments can be done, but they 12:36:33
8 have to be done such that you're correct in 12:36:36
9 that the -- to maintain an appropriate center 12:36:40
10 gravity location so the vehicle doesn't tip 12:36:42
11 over. 12:36:44

12 Q And paragraph 28 you stated, "Further, 12:36:50
13 counteracting any forward weight from the front 12:36:53
14 seat are the rear heavy wheels." 12:36:56

15 Did I read that correctly? 12:36:59

16 A You're referencing paragraph 28? 12:37:03

17 Q Yes. 12:37:05

18 A Yes. I state, "Further, counteracting any 12:37:13
19 forward weight from the front seat are the rear 12:37:16
20 heavy wheels further which Dr. Cameron creates 12:37:18
21 a rear forward bias in the stroller center of 12:37:21
22 gravity." 12:37:24

23 Q So the premise of your sentence in paragraph 28 12:37:26
24 is that there is forward weight from the front 12:37:30
25 seat to counteract, correct? 12:37:32

1 A Yeah. I mean, there's child seats. There's 12:37:40
2 structure there, so there is forward weight, 12:37:42
3 yes. 12:37:45

4 Q And in paragraph 27 describing your proposed 12:37:50
5 modification you said in the third line, "This 12:37:54
6 is a stable condition not prone to tipping." 12:37:59

7 Did I read that correctly? 12:38:03

8 A Paragraph 27 states, "The cups 34 are where the 12:38:13
9 seats connect to the interface component 100 as 12:38:18
10 shown above. Both cups 34 are still between 12:38:20
11 the front and rear wheels. This is a stable 12:38:22
12 condition not prone to tipping." 12:38:25

13 Q And so the "this" is a stable -- the "this" 12:38:27
14 that's being referred to in that sentence is 12:38:31
15 your hypothetical modification of Offord '341, 12:38:34
16 correct? 12:38:39

17 A It's talking about in ground three, which is 12:39:01
18 the first line there is reversing the interface 12:39:04
19 components 100 would not make the stroller 12:39:07
20 unstable, so switching -- reversing the 12:39:09
21 components around would not make the stable 12:39:14
22 prone to tipping. 12:39:18

23 One skilled in the art they 12:39:19
24 would have -- those would be adjusted properly 12:39:20
25 and designed properly from the POSITA that the 12:39:23

1 stroller would not be unstable. 12:39:26

2 Q Now -- so your opinion is that under the 12:39:28

3 proposed modification as you have proposed it, 12:39:32

4 that that results in a stable condition not 12:39:36

5 prone to tipping; that's your opinion, correct? 12:39:40

6 A Yes. One -- a POSITA could easily make those 12:39:45

7 adjustments and have a design that would not be 12:39:49

8 prone to tipping. 12:39:51

9 Q But you did not perform any tests to confirm 12:39:52

10 that, correct? 12:39:55

11 A No physical tests were created. None was felt 12:39:59

12 that were needed. 12:40:02

13 Q And you didn't model it in CAD or any other 12:40:03

14 tool, correct? 12:40:05

15 A No. No CAD design work was done in this 12:40:09

16 situation, no. 12:40:12

17 Q In your modified Figure 15, which is shown on 12:40:17

18 page 19 of your declaration, both seats are 12:40:20

19 facing forward, correct? 12:40:25

20 A I don't remember if they were both facing 12:40:37

21 forward or not. The lower one is facing 12:40:39

22 forward. I can't remember the orientation. 12:40:42

23 The upper one doesn't show the full structure, 12:40:45

24 so I don't remember which direction that is at 12:40:49

25 this point right now. 12:40:51

1 Q Well, but as an expert, I'm sure that you can 12:40:52
2 tell me from your own figure what direction the 12:40:57
3 seat is facing -- the upper seat is facing in 12:41:00
4 your proposed annotated and modified Figure 15. 12:41:04

5 So please tell me, both of those 12:41:09
6 seats are facing forward, correct? 12:41:12

7 A That structure could even be for a bassinet, so 12:41:21
8 it could be forward or reverse. I don't 12:41:23
9 remember at this point in time. 12:41:25

10 Q I'm not asking what you remember. I'm asking 12:41:27
11 you what you proposed and modified in the 12:41:30
12 figure that is shown right here in paragraph 26 12:41:34
13 of your declaration. 12:41:36

14 A I understand the question. I just at this 12:41:43
15 point don't remember as that was drawn how that 12:41:46
16 was -- if the upper seat was in a forward or 12:41:48
17 rearward configuration. 12:41:50

18 Q And is it your testimony as an Offord expert by 12:41:52
19 the petitioner that you cannot tell from your 12:41:55
20 own drawing that you created whether or not the 12:41:58
21 upper seat is facing forward or backward? 12:42:03

22 A I'm saying it doesn't really matter. It's 12:42:10
23 the -- I feel it's irrelevant in this 12:42:13
24 particular situation as the seats -- the 12:42:15
25 verbiage and reading through the Offord is that 12:42:19

1 Offord describes a forward and reversing seat 12:42:23
2 configurations. This particular annotation 12:42:26
3 doesn't necessarily -- it could be either one. 12:42:31
4 Q Well, I'm pretty sure that it did not ask about 12:42:35
5 whether you thought it mattered. I'm asking 12:42:38
6 what you illustrated, and I'm pretty sure -- so 12:42:40
7 my question, again, Mr. Prairie, is as a 12:42:45
8 proffered expert by the petitioner who created 12:42:49
9 this annotated and modified Figure 15, does 12:42:53
10 that drawing show the upper seat facing 12:42:56
11 forward? 12:43:01
12 A I'll stand by -- I don't recall if it's in a 12:43:06
13 forward or reverse configuration of the upper 12:43:08
14 seat. 12:43:10
15 Q Okay. If you would pull up Exhibit -- let me 12:43:15
16 just ask this question first. 12:43:20
17 In Offord '797, which I think in 12:43:22
18 our previous deposition I referred to as the 12:43:26
19 old Offord, rotating the interface portion of 12:43:28
20 Offord '797 180 degrees changes the direction 12:43:34
21 that the seats face, correct? 12:43:39
22 A The reference is that -- what exhibit number is 12:43:45
23 that you're referring to? 12:43:48
24 Q Do you need to refer to the exhibit to refresh 12:43:49
25 your recollection -- 12:43:51

1 A Yeah -- 12:43:53

2 Q -- to answer the question? 12:43:54

3 A I'm making sure we're referencing the correct 12:43:55

4 Offord and which images you're referring to. 12:43:58

5 (Exhibit 1054 was marked for 12:44:01

6 identification.) 12:44:01

7 BY MR. THOMAS: 12:44:01

8 Q Okay. You can pull up Exhibit 1054 which is 12:44:01

9 Offord '797 and Figure 1. 12:44:04

10 Figure 1 shows -- of 12:44:18

11 Exhibit 1054 illustrates both seats facing 12:44:22

12 backwards, correct? 12:44:25

13 A Yes. It appears they're both in a 12:44:28

14 rearward-facing configuration there. 12:44:30

15 Q And Figure 2 shows both seats facing forward, 12:44:32

16 correct? 12:44:35

17 A Yes, Figure 2 appears they're both in a forward 12:44:39

18 configuration. 12:44:42

19 Q And the cause of changing one to the other was 12:44:44

20 the rotation of the interface portion ten, the 12:44:47

21 subassembly ten 180 degrees to change the 12:44:51

22 direction the seats face, correct? 12:44:56

23 MR. CUNNINGHAM: Object. Outside the 12:44:58

24 scope. 12:45:00

25 THE WITNESS: There are some 12:45:06

1 components that are reversed, but I don't 12:45:07
2 recall which item numbers those are 12:45:08
3 all-inclusive. 12:45:11

4 BY MR. THOMAS: 12:45:13

5 Q When you "say all-inclusive," what do you mean? 12:45:13

6 A Well, there's multiple brackets in there. I 12:45:16
7 don't recall. So I know there's the brackets 12:45:18
8 that are interchangeable and reversible, but I 12:45:21
9 don't remember the numbers off the top of my 12:45:24
10 head. I would have to review, and I can -- if 12:45:26
11 you wish, I can review the document and make 12:45:28
12 sure we're citing the correct -- 12:45:31

13 Q I'll direct you to Exhibit 1054, page 4, line 12:45:33
14 24. You can read that paragraph and see if 12:45:38
15 that refreshes your recollection. 12:45:48

16 Please tell me if it refreshes 12:45:54
17 your recollection about what causes the seats 12:45:56
18 to change direction. 12:45:59

19 A Yes. The interface portion is Item No. 10 12:46:20
20 which is rotated 180 degrees to allow changing 12:46:24
21 the seats from forward to rear facing, to 12:46:28
22 forward facing. 12:46:31

23 Q Now, in your modified Figure 15, you did not 12:46:34
24 change the directions in which the seats have 12:46:42
25 Offord '341 face, correct? 12:46:45

1 MR. CUNNINGHAM: Objection. Asked 12:46:50

2 and answered. 12:46:50

3 THE WITNESS: That particular graphic 12:46:59

4 is using the newer Offord brackets, not the 12:46:59

5 same one that is in Exhibit 1054, not the '797 12:47:02

6 version. 12:47:10

7 BY MR. THOMAS: 12:47:10

8 Q Are you able to pull up Exhibit 1051 so that 12:47:11

9 you can see both Figure 15 of 1051 and your 12:47:16

10 modified Figure 15 in paragraph 26 of your 12:47:21

11 declaration at the same time? 12:47:26

12 A So what do you want me to see at the same time? 12:47:30

13 Q Exhibit 1051, Figure 15. 12:47:32

14 A Okay. I have Figure 15 pulled up here of 1051. 12:47:35

15 Q And you can simultaneously see so that you can 12:47:57

16 compare that to your modified Figure 15 that's 12:48:00

17 in paragraph 26 of your declaration. 12:48:03

18 Are you able to look at the two 12:48:10

19 sort of simultaneously? 12:48:11

20 A Yes. I have my declaration in front of me, my 12:48:14

21 rebuttal declaration. 12:48:17

22 Q Okay. So in Figure 15 of Exhibit 1051, both 12:48:18

23 seats are facing forward, aren't they? 12:48:26

24 MR. CUNNINGHAM: Objection. Asked 12:48:40

25 and answered. 12:48:40

1 THE WITNESS: The label for Figure 15 12:49:01
2 doesn't particularly state that. I would have 12:49:03
3 to read through Offord again at 1051 where it 12:49:06
4 describes that. I can if you wish. 12:49:13
5 BY MR. THOMAS: 12:49:14
6 Q Sitting here today without referring to the 12:49:15
7 text, it's your testimony that you cannot tell 12:49:17
8 what direction the two seats attach to the 12:49:19
9 stroller in Figure 15 face; that's your 12:49:23
10 testimony? 12:49:30
11 A The forward one I can tell is front facing. 12:49:30
12 The rear one I'm going to have to -- I can't 12:49:33
13 definitively make a statement because I don't 12:49:36
14 have the -- how the upper bassinet or the 12:49:41
15 covering isn't popped up, so it's tough to see 12:49:45
16 where the actual child seat is and the head 12:49:47
17 would be positioned relative to that. 12:49:51
18 Q What would -- that's the -- for the lower seat, 12:49:55
19 that's pointed to with the reference numeral 12:50:00
20 10, isn't it, in this original Figure 15? 12:50:04
21 A You're referring to Exhibit 1051, right? 12:50:08
22 Q 1051, yes. 12:50:12
23 A And which item did you say? 12:50:14
24 Q The lower seat that's pointed to at reference 12:50:16
25 numeral 10. 12:50:21

1 A Yes. Item 10 is pointing to a component of 12:50:24
2 that lower seat. 12:50:27

3 Q And Item 10 -- there's also an Item 10 on the 12:50:30
4 upper seat of Figure 15, correct? 12:50:33

5 A It appears to be, yes. 12:50:45

6 Q So would a POSITA understand those to be the 12:50:48
7 same seat? 12:50:52

8 A Well, two looks like it's the overall seat. 10 12:51:01
9 is a component of the seat it appears, so two 12:51:05
10 is coming on the right-hand corner. I'll look 12:51:07
11 at label two, but I'm guessing two is 12:51:12
12 identifying the whole seat. 12:51:15

13 Vehicle two, frame assembly. It 12:51:26
14 looks like 10 is the vehicle also includes a 12:51:38
15 child carrier unit in the form of seat 10 12:51:40
16 recently mounted to the frame assembly four. 12:51:43
17 Seat 10 is the overall seat itself, not a 12:51:45
18 particular component of the seat. 12:51:48

19 Q And Figure 15 shows two seats 10 mounted to the 12:51:52
20 stroller frame, correct? 12:51:58

21 A Yes. There are two seats -- two 10s or two 12:52:03
22 seats attached. 12:52:06

23 Q And do you understand those seats 10 to be the 12:52:07
24 same or different seats? 12:52:10

25 MR. CUNNINGHAM: Objection. Asked 12:52:14

1 and answered. 12:52:15

2 THE WITNESS: I guess they would 12:52:24

3 be -- I would take them -- it doesn't break 12:52:25

4 apart. There's different types of seats. 12:52:27

5 I'd have to read through Offord just 12:52:30

6 to refresh my memory if there's discussion 12:52:32

7 around like bassinet seats or whatever, but 12:52:34

8 they're definitely seats and definitely similar 12:52:38

9 in nature. 12:52:42

10 BY MR. THOMAS: 12:52:49

11 Q Whatever they are, looking at the orientation 12:52:50

12 of those -- the outer frame of those two seats 12:52:54

13 10 in Figure 15 of Exhibit 1051, whatever 12:52:58

14 direction they're facing since you said you 12:53:07

15 couldn't tell me what they were both facing, 12:53:09

16 they're facing the same direction in your 12:53:12

17 modified Figure 15, correct? 12:53:17

18 MR. CUNNINGHAM: Objection. Asked 12:53:21

19 and answered. 12:53:21

20 THE WITNESS: What do you mean by 12:53:27

21 "same direction"? 12:53:27

22 BY MR. THOMAS: 12:53:29

23 Q Well, you did not change the -- whether they 12:53:31

24 started facing forward or started facing 12:53:35

25 backward in the original Figure 15. 12:53:37

1 In your modified Figure 15, they 12:53:42
2 stay the same direction as they were in the 12:53:45
3 original, correct? 12:53:47

4 A Yes. The annotation is the same orientation as 12:53:53
5 they were in Figure 15, just placed in 12:53:55
6 different locations. 12:53:59

7 Q And because you didn't change the orientations 12:54:03
8 or directions that they face, the only thing 12:54:05
9 that changed is which seat is higher, correct? 12:54:07

10 A The annotated figure shows one configuration, 12:54:20
11 but the offer to self-teach is alternate 12:54:22
12 configurations as well, so they can be forward 12:54:26
13 facing or rearward facing. 12:54:28

14 Q I'm asking about your modified Figure 15. 12:54:30
15 What changes is which seat is 12:54:33
16 higher, correct, not the direction that they 12:54:35
17 face? 12:54:37

18 A I did not create graphics to show every 12:54:40
19 possible configuration that could exist. I 12:54:44
20 showed one potential configuration. 12:54:47

21 Q And in that one potential configuration, what 12:54:49
22 changed was which seat is higher, not the 12:54:52
23 direction that they face, correct? 12:54:54

24 A The annotated figure has -- the height is 12:55:01
25 changed, but it's also possible for the 12:55:06

1 direction to change as well. 12:55:09

2 Q All right. In original Figure 15 in 12:55:16

3 Exhibit 1051, can you see the location of the 12:55:25

4 cups 34? 12:55:32

5 A I don't see Item 34. 12:55:44

6 Q Are you able to tell which thing it is 12:55:46

7 referring to? If I say "the cups," do you 12:55:48

8 remember what that is? 12:55:51

9 A Generally. But I don't know -- there is no 34, 12:55:52

10 so you threw out a No. 34. 12:55:55

11 Q So turn to your declaration, paragraph 27. 12:55:57

12 You're referring to your modified Figure 15. 12:56:03

13 You do not have any reference 12:56:05

14 numerals at all on this modified figure on page 12:56:06

15 19 of your declaration, correct? 12:56:11

16 A There are no labels on Figure 15. 12:56:12

17 Q There's no labels, but then you describe the 12:56:15

18 cups 34 green/yellow are where the seats 12:56:17

19 connect to the interface component 100. You 12:56:20

20 also describe the cups 34 are where the 12:56:22

21 vertical forces are imparted into the interface 12:56:24

22 component 100, correct? 12:56:28

23 I accurately read your 12:56:36

24 testimony? 12:56:38

25 A Please reread it. I was looking through the 12:56:38

1 other figures. Please reread it again. 12:56:41

2 Q I would ask you to follow my directions and 12:56:43

3 refer to the testimony that I'm pointing you to 12:56:47

4 and asking you about. 12:56:50

5 In paragraph 27 of your 12:56:51

6 testimony you refer to the cups 34 and describe 12:56:52

7 what they do, right? 12:56:55

8 A Yes. Paragraph 27 identifies cups 34. 12:57:00

9 Q And even though they're not identified or drawn 12:57:03

10 or labeled -- strike that. 12:57:06

11 Even though they are not labeled 12:57:09

12 on your annotated and modified Figure 15, 12:57:11

13 right? 12:57:14

14 A Yeah. They're labeled in terms of color. 12:57:19

15 Q Now that you have refreshed your recollection 12:57:21

16 by looking at paragraph 27, are you able to see 12:57:24

17 what -- where the cups are in your annotated 12:57:29

18 and modified Figure 15 directly above paragraph 12:57:32

19 27? 12:57:35

20 A Yeah, I got to load this. Give me a little bit 12:57:43

21 here. I've got my printed copy is a black and 12:57:47

22 white copy. Now that we're referencing color, 12:57:51

23 I've got to make sure I have the colored 12:57:53

24 version in front of me. 12:57:56

25 The cups -- there's a light 12:58:24

1 green and also a yellow on the front where the 12:58:26

2 cups are. 12:58:28

3 Q So you can locate the cups in your annotated 12:58:28

4 modified Figure 15, right? 12:58:31

5 A Yes, I can. 12:58:33

6 Q Now, locate the cups in the unmodified original 12:58:35

7 Figure 15 in Exhibit 1051 and describe to me 12:58:41

8 where they are? 12:58:48

9 A They're labeled as 106 in Figure 15. 12:58:57

10 Q Both the lower ones and the upper ones, 12:59:02

11 correct? 12:59:05

12 A Let me confirm that through text. The cups are 12:59:10

13 referred to as connector sockets within the 12:59:39

14 '341 patent -- Offord patent. 12:59:45

15 Q Okay. And those connector sockets, is it that 12:59:48

16 the cups are part of the connector socket or 12:59:52

17 the connector socket is part of the cup; one of 12:59:54

18 those, right? 12:59:57

19 A Yeah, I guess the cups themselves are the 01:00:03

20 internal feature, the connector socket I guess 01:00:09

21 I would call it. It could be more the whole 01:00:14

22 assembly at that end. 01:00:17

23 Q Can we just call -- since you described them in 01:00:21

24 your declaration paragraph 27, your rebuttal 01:00:24

25 declaration paragraph 27, can we call them cups 01:00:27

1 34 in both and you know what I'm referring to; 01:00:30
2 you're referring to the same thing? 01:00:34
3 A Yes, that would be the same thing. 01:00:35
4 Q The original and the modified version, right? 01:00:36
5 A That would be sufficient, yes. 01:00:39
6 Q Okay. So in the original Figure 15 of 01:00:40
7 Exhibit 1051, the cups 34 -- sorry, strike 01:00:46
8 that. 01:00:52
9 In your modified figure, the 01:00:52
10 cups 34 sit further forward on the stroller 01:00:54
11 than in the original in Exhibit 1051, correct? 01:00:57
12 A Which set of cups are you referring to? 01:01:06
13 Q Why don't you tell me about both. 01:01:11
14 A It's your question so which -- 01:01:16
15 Q My question is for you to tell me about both. 01:01:18
16 A I was looking at them side-by-side here. I 01:01:41
17 would say the original -- the lower ones from a 01:01:47
18 four aft standpoint relative to the rear wheels 01:01:52
19 could be slightly more forward than they were 01:01:57
20 in the original figure. The annotated figure 01:01:58
21 might be slightly forward. The other one could 01:02:02
22 be the same position, maybe further back. It's 01:02:10
23 hard to say for sure. 01:02:12
24 Q Maybe I do want to break this into two. I'm 01:02:18
25 sorry. 01:02:20

1 Okay. So let's take the 01:02:23
2 original Figure 15, the lower seat. That one 01:02:24
3 we see the 106 to the left of the -- actually, 01:02:32
4 let me see if I can do this. Let me start 01:02:41
5 over. 01:02:57

6 The lower seat in the original 01:02:57
7 15 in your annotated and modified version, that 01:02:59
8 same seat becomes the upper seat, correct? 01:03:06

9 A Say that again. 01:03:18

10 Q In the original figure, the rearward seat, I 01:03:21
11 guess you said aft directionally, the rearward 01:03:27
12 seat moves up to the higher position in your 01:03:32
13 annotated Figure 15, but it's still the 01:03:37
14 rearward seat, right? 01:03:39

15 A Yes, I would agree with that statement. 01:03:41

16 Q And the rearward cup 34 in original 15 is 01:03:43
17 forward or backward or about the same as the 01:03:53
18 rearward cup in your modified Figure 15? 01:03:57

19 A From a visual standpoint, I think when they're 01:04:17
20 flipped around, probably about -- it would be 01:04:20
21 approximately the same. 01:04:24

22 Q So now let's talk about the forward seat. 01:04:24

23 A Maybe farther back. It doesn't have -- we're 01:04:28
24 not getting to the exact dimensions here into 01:04:31
25 this annotated. 01:04:34

1 Q So let's talk about the forward seat in your 01:04:36
2 annotation and modified Figure 15. 01:04:38

3 You see that has the yellow cup 01:04:42
4 34, correct? 01:04:44

5 A I see the yellow cups that you're referring to. 01:04:49

6 Q And that is farther forward on the stroller 01:04:51
7 than the forward seats cup 34 in the original 01:04:53
8 Figure 15 of Exhibit 1051, correct? 01:04:59

9 A It may be slightly forward than the original 01:05:04
10 annotation. 01:05:09

11 Q But the yellow cups are in your annotated and 01:05:35
12 modified Figure 15 are further forward than any 01:05:38
13 of the cups shown in the original Figure 15 of 01:05:43
14 Offord, correct? 01:05:49

15 A I guess I've not made that assessment. If 01:05:55
16 you'd like me to, I can study all the images. 01:06:00

17 Q It's the same image other than your 01:06:03
18 modification that you made. So yeah, I think 01:06:05
19 that you should be able to tell me if the 01:06:07
20 yellow cups in your annotated and modified 01:06:09
21 Figure 15 are forward -- further forward on the 01:06:12
22 stroller frame than either of the cups 106, 01:06:17
23 cups 34, or sockets 106 shown in the original 01:06:21
24 Figure 15. It's the same figure but for your 01:06:25
25 modification. 01:06:28

1 A The annotated figure is shown in the ultimate 01:06:32
2 configuration. There's nothing stating that a 01:06:36
3 POSITA could modify the frame to accommodate 01:06:38
4 from center gravity standpoint to maintain a 01:06:41
5 proper center of gravity. 01:06:44

6 The annotation is showing change 01:06:47
7 of seat locations. It's not excluding the 01:06:50
8 other modifications couldn't be made to a -- a 01:06:53
9 POSITA could make to make a stroller that would 01:06:57
10 be stable. 01:06:59

11 Q In your -- look forward in your declaration to 01:07:30
12 paragraph 47. 01:07:34

13 A Okay. 01:07:45

14 Q You have in the figure at the bottom at the end 01:07:49
15 of paragraph 47, you've circled two items in 01:07:55
16 red, correct? 01:08:00

17 A Yes. 01:08:07

18 Q And -- 01:08:19

19 A It might have been Dr. Cameron's. I don't 01:08:21
20 remember. 01:08:23

21 Q It's illustrated here anyway, those two items 01:08:24
22 in red? 01:08:26

23 A I think it's your witnesses, your expert 01:08:27
24 circles, I think. 01:08:29

25 Q In your annotated and modified Figure 15 01:08:32

1 showing your proposed modification, the cups 34 01:08:35
2 of the forward seat are next to those circled 01:08:39
3 items in your proposed modification, correct, 01:08:46
4 where they would be on your modified Figure 15? 01:08:50
5 A I believe they're close to the upper front bar. 01:09:07
6 There's a front crossbar that goes around, so I 01:09:09
7 believe this figure is your expert's figure. I 01:09:16
8 would say that those are farther up into the 01:09:19
9 actual -- that swooping bar that goes across 01:09:23
10 the front. 01:09:26
11 Q Paragraph 49 you say, "It is my opinion that 01:09:46
12 the lug 108 sits forward of the connection 01:09:48
13 between the lug 108 and basket frame 44." 01:09:50
14 Do you see that testimony? 01:09:56
15 A You're at paragraph 49 you said? 01:10:00
16 Q Yes. 01:10:02
17 A Reread what you just -- restate your question. 01:10:03
18 Q So you found paragraph 49. You state, "As 01:10:06
19 shown in the below annotated Figure 15, the 01:10:10
20 basket frame connection point is well behind 01:10:14
21 the lower socket green to which the lug 108 is 01:10:17
22 attached." 01:10:21
23 Did I read that correctly? 01:10:26
24 A Yes. 01:10:31
25 Q And so in your -- at the bottom of paragraph 49 01:10:31

1 also shows another version of your annotated -- 01:10:35
2 your modified and annotated Figure 15, correct? 01:10:39
3 A Yes, it is. 01:10:45
4 Q And in this version, the yellow cups in the 01:10:47
5 forward seat are further forward than the 01:10:53
6 basket frame connection point that you have 01:10:59
7 annotated in that figure, correct? 01:11:03
8 A It's further forward? 01:11:11
9 Q Yes. The cups 34 of the forward and lower seat 01:11:13
10 are further forward -- located further forward 01:11:17
11 than the basket frame connection point, 01:11:22
12 correct? 01:11:26
13 A Yes, that is true. 01:11:32
14 Q Flipping back to the original Figure 15 in 01:11:34
15 Exhibit 1051, the cups 34 of the upper and 01:11:34
16 forward seat are behind or rearward of the same 01:11:42
17 basket frame connection point, correct? 01:11:50
18 A I'm not agreeing with your statement there. 01:11:56
19 They appear to be in the same spot to me. 01:12:00
20 Q Is it in the same spot that it was in your 01:12:03
21 modified and annotated Figure 15? That's your 01:12:05
22 testimony? 01:12:16
23 A What appears to be -- the figure above -- the 01:12:18
24 annotated Figure 15 within paragraph 49, the 01:12:26
25 cup location, that's what you're asking 01:12:29

1 relative to the cup location and you're talking 01:12:32
2 the annotated modified figure above -- in 01:12:45
3 paragraph 26, is that what you're comparing? 01:12:49
4 Is that your question? 01:12:51
5 Q No. I'm comparing the cup location in your 01:12:53
6 annotated Figure 15 to the original Figure 15. 01:12:58
7 A Oh, the original. 01:13:06
8 Q The cup location in the original Figure 15. 01:13:07
9 A So the annotated one is farther forward than 01:13:23
10 the original, but it's also lower which also 01:13:26
11 affects center gravity. 01:13:40
12 Q The yellow cups in your annotated and modified 01:14:36
13 Figure 15 are further forward of both cups in 01:14:39
14 the original Figure 15, both sets of cups in 01:14:47
15 the original 15, right? 01:14:52
16 A I'm not fully following your question, 01:15:04
17 Mr. Thomas. 01:15:05
18 Q Well, we considered the two sets of cups 01:15:07
19 separately, right, the rearward seat and the 01:15:10
20 forward seat, the lower seat and the upper 01:15:12
21 seat? 01:15:14
22 A Okay. You better stick to one image. They're 01:15:17
23 different heights and positions, so you need to 01:15:19
24 stick with one figure when you're referencing 01:15:21
25 height and position. 01:15:23

1 Q Okay. Let's look at your annotated and 01:15:25
2 modified Figure 15. 01:15:28

3 A Okay. 01:15:30

4 Q We talked about both the green set of cups and 01:15:30
5 the yellow set of cups, right? 01:15:33

6 A Yep. 01:15:36

7 Q And you are able to identify the corresponding 01:15:38
8 green and yellow cups in the original Figure 01:15:40
9 15, right? 01:15:43

10 A Yep, I'm following you now. 01:15:45

11 Q And in the annotated and modified Figure 15, 01:15:47
12 the yellow cups -- sorry. 01:15:50

13 The yellow cups of your 01:15:57
14 annotated modified Figure 15 are further 01:15:59
15 forward than both of the yellow and green cups 01:16:01
16 in the original Figure 15? 01:16:06

17 A Right. When you throw "the both" in there, 01:16:10
18 you're throwing me off as to what you mean by 01:16:19
19 "the both." 01:16:22

20 Q You just said you knew where each of the 01:16:23
21 corresponding yellow/green cups were in the 01:16:24
22 original Figure 15? 01:16:27

23 A But you're changing baseline -- you're talking 01:16:28
24 relative position, but you're changing your 01:16:30
25 baseline. 01:16:33

1	Q	The cups 106 in Figure 15.	01:16:34
2	A	You need to go some kind of XY scale, relative	01:16:37
3		scale, because you're changing figures and	01:16:40
4		positions, and you need to have a relative	01:16:42
5		zero-zero point to --	01:16:46
6	Q	How many cups are represented in original	01:16:48
7		Figure 15 of Offord?	01:16:53
8		There's four, right; two cups	01:16:59
9		for each seat, right?	01:17:01
10	A	There's two cups for each seat.	01:17:04
11	Q	So there's four cups that are represented in	01:17:06
12		Offord Figure 15, correct?	01:17:10
13	A	Yes.	01:17:14
14	Q	And there are two yellow cups shown in your	01:17:15
15		annotated and modified Figure 15, correct?	01:17:19
16	A	Yes, that is correct.	01:17:22
17	Q	And those two yellow cups are further forward	01:17:23
18		on the stroller than any of the four cups in	01:17:27
19		the original Figure 15, correct?	01:17:32
20	A	Take a base point on the stroller and say if	01:17:38
21		it's forward or reverse from that, not relative	01:17:41
22		objects and space.	01:17:44
23	Q	Why can't you give me an answer? I mean,	01:17:45
24		it's -- you're interpreting these figures. You	01:17:47
25		modified these figures. Just look at it and	01:17:49

1 tell me. 01:17:53

2 A No. I'm asking you, Warren, you tell me a 01:17:54

3 point on the stroller. And if it's forward or 01:17:56

4 from that particular point, that's what I'm 01:17:59

5 asking you to ask a question on. 01:18:01

6 I understand were you're headed 01:18:03

7 here, but you don't have -- for me to tell you 01:18:05

8 forward/reverse tells me I got to have an 01:18:08

9 accurate zero-zero point, you have not given me 01:18:10

10 an appropriate zero-zero point to tell me 01:18:13

11 forward or reverse so... 01:18:13

12 Q We talked about bracket -- what was it called? 01:18:15

13 What did you illustrate it as? The basket 01:18:21

14 frame connection point? 01:18:24

15 Do you remember the basket frame 01:18:28

16 connection point on the stroller frame? 01:18:30

17 A Well, how about you pull up an image and you 01:18:32

18 point to a location? 01:18:35

19 Q Paragraph 49 of your declaration, Mr. Prairie. 01:18:37

20 The basket frame connection point that you just 01:18:40

21 testified about. 01:18:42

22 A You're going to use the basket frame connection 01:19:00

23 point as your zero-zero point for forward and 01:19:02

24 up and down; is that what you're saying? 01:19:05

25 Q I asked you -- do you recall your testimony a 01:19:06

1 few minutes ago when you said that the yellow 01:19:09
2 cups in your annotated and modified figure were 01:19:12
3 further forward than the -- or forward of the 01:19:15
4 basket frame connection point? 01:19:19

5 A Yeah. Because you define inaccurate points, 01:19:21
6 that's why -- you're doing -- I'm asking you to 01:19:24
7 give me a particular point, and I can tell you 01:19:27
8 greater than, less than from that point. 01:19:30

9 You are not doing that. You're 01:19:32
10 moving the dynamic. So I'm asking you, give me 01:19:34
11 a specific reference point, and we can work 01:19:38
12 from that specific reference point. Otherwise 01:19:40
13 I can't answer your question. 01:19:46

14 Q So in your annotated and modified Figure 15, 01:19:48
15 you have already agreed that the yellow cups 01:19:51
16 are forward of the basket frame connection 01:19:54
17 point, right? 01:20:00

18 A Within that annotated -- we're referencing the 01:20:08
19 figure right above paragraph 50. Would that be 01:20:12
20 consistent? You're referencing multiple 01:20:16
21 figures, so I want to make sure for the record 01:20:18
22 that we're referencing them for the appropriate 01:20:20
23 figures. So we've got -- on page 32 of my 01:20:21
24 rebuttal declaration, is that the figure that 01:20:24
25 you're referencing on page 32? 01:20:27

1	Q	That was -- that is sufficient. You see the	01:20:30
2		basket frame connection point there, right?	01:20:32
3	A	Now we have something to work with.	01:20:35
4	Q	Okay. Can you identify that same basket frame	01:20:37
5		connection point in the original Figure 15?	01:20:41
6	A	Okay, yep.	01:20:56
7	Q	In the original Figure 15, all four cups 106	01:20:58
8		are rearward of that basket frame connection	01:21:02
9		point, correct?	01:21:04
10	A	Yes. It would appear in the original all of	01:21:13
11		them are rear of that particular point.	01:21:16
12	Q	And in your annotated and modified Figure 15,	01:21:19
13		the yellow cups are forward of that basket	01:21:23
14		frame connection point, correct?	01:21:26
15	A	The front set of cups are forward and lower as	01:21:30
16		well. They're also at a lower which affects	01:21:33
17		the center gravity as well.	01:21:36
18	Q	Go to paragraph 45 of your rebuttal	01:22:07
19		declaration, Exhibit 1082.	01:22:10
20	A	I'm at paragraph 45.	01:22:20
21	Q	The last sentence of that -- the last two	01:22:26
22		sentences of that paragraph you said, "When two	01:22:29
23		connecting components are misaligned by mere	01:22:33
24		millimeters, it is obvious to a POSITA that the	01:22:36
25		solution is to slightly shift the placement to	01:22:40

1 put the connecting components into alignment. 01:22:42

2 This is routine design work." 01:22:45

3 Did I read that correctly? 01:22:47

4 A Yes. I see the lines that you just read. 01:22:49

5 Q And this paragraph generally is about reversing 01:22:54

6 the interface components 100 of Offord '341, 01:22:57

7 correct? 01:23:01

8 A Are we talking component 100 or -- I don't 01:23:17

9 remember the identification. 01:23:20

10 Q You could perhaps look at the second line of 01:23:22

11 the same paragraph for a refresher. 01:23:24

12 A Okay. I understand the components. I was 01:23:34

13 making sure -- ask your question. 01:23:39

14 Q This paragraph is about reversing the interface 01:23:43

15 components 100 of Offord '341, correct? 01:23:46

16 A It's talking about reversibility of components 01:23:55

17 100, yes. 01:23:57

18 Q So if after reversal of the components 100, if 01:24:02

19 the detent and the receptor cup were 01:24:06

20 misaligned, the fix you describe is to shift 01:24:10

21 the placement of the components, correct? 01:24:12

22 A I guess what I'm saying even if you had a 01:24:23

23 situation like this, it could be a production 01:24:25

24 variation, whatever it may be, is that yes, you 01:24:31

25 would make simple tolerance qualifications to 01:24:33

1 make the parts made up. 01:24:36

2 Q So the fix that you're describing here is to 01:24:44

3 shift the placement of the components if they 01:24:46

4 were not aligned in the first place, correct? 01:24:49

5 A That's a normal machine design thing. Yeah, if 01:24:54

6 something doesn't get made right or maybe was 01:24:57

7 designed incorrectly, you would make slight 01:24:59

8 modifications to the tooling or the production 01:25:02

9 process or assembly of the components to make 01:25:04

10 sure that they were made up appropriately. 01:25:07

11 Q Please turn to paragraph 43. Your testimony 01:25:15

12 here is, "I measured Figure 16 at the scale as 01:25:22

13 published and found the left and right 01:25:29

14 dimensions as 11.2 millimeters and 01:25:31

15 12.0 millimeters respectfully." 01:25:35

16 Did I read that correctly? 01:25:39

17 A Yes, you did. 01:25:40

18 Q So you measured Figure 16, that's your 01:25:43

19 testimony? 01:25:45

20 A Yes, I did. 01:25:48

21 Q And the measurements of the left and right 01:25:50

22 dimensions were different, correct? 01:25:52

23 A Just by a slight amount. 01:25:57

24 Q Offord '341 states no scale for Figure 16, 01:26:01

25 correct? 01:26:04

1 A No. That's why I said it was done at the 01:26:06
2 published scale meaning it was printed on eight 01:26:08
3 and a half by 11 paper. 01:26:14

4 Q And your opinions in paragraph 41 which is that 01:26:25
5 dimensions can't be measured on a view that's 01:26:28
6 even slightly in perspective does not depend on 01:26:30
7 the scale at which the view is examined, 01:26:33
8 correct -- 01:26:35

9 A When I first started, ultimately the initial 01:26:43
10 position here is that ultimately you would not 01:26:45
11 measure them, but Dr. Cameron has, and my point 01:26:46
12 being was that even if you were to measure 01:26:51
13 them, the difference is very slight. 01:26:55

14 Q Paragraph 41 doesn't state any type of scale 01:27:06
15 exception, right? 01:27:10

16 A No, that's the first position. And so the 01:27:12
17 primary position is that you would not scale 01:27:14
18 and you would not measure the patent drawings, 01:27:17
19 but Dr. Cameron made -- her testimony was that 01:27:21
20 you can measure them particularly in a 01:27:25
21 perspective view. 01:27:27

22 And so further back, I have 01:27:28
23 disagreed with her position. I was simply 01:27:30
24 stating that even if you were to assume that 01:27:34
25 you could do what she's stating you could do, 01:27:36

1 even under her -- that situation, there's still 01:27:38

2 only slight differences. 01:27:41

3 Q As relates to the testimony you offered in your 01:27:49

4 rebuttal declaration, there's no exception 01:27:51

5 identified in paragraph 41, and that opinion 01:27:54

6 doesn't depend on the scale at which the view 01:27:58

7 is examined, correct? 01:28:02

8 A If you go up to paragraph 32, I dispute 01:28:03

9 Dr. Cameron's position on that. 01:28:06

10 Q I'm asking about your paragraph 41 opinion 01:28:12

11 whether or not the dimensions, whether or not 01:28:16

12 they can be measured in a view that's slightly 01:28:22

13 perspective depends on the scale, and your 01:28:25

14 opinion is that it does not depend on the 01:28:27

15 scale, correct? 01:28:29

16 A In paragraph 43 it's showing as it was the 01:28:35

17 scale that was drawn at, that would be the 01:28:38

18 dimensions that were there. What we don't know 01:28:40

19 is we don't have a scale drawing, so we don't 01:28:42

20 know that is one millimeter on the patent 01:28:45

21 drawing equal to a foot. We do not know that. 01:28:49

22 So we don't know what that 01:28:52

23 measured actually correlates to. And knowing 01:28:56

24 that a stroller is much bigger than a sheet of 01:29:02

25 paper that we can't really scale it because we 01:29:05

1 don't know how much bigger it is. 01:29:09

2 Q Figure 16 is a patent drawing, not a 01:29:15

3 manufactured part, correct? 01:29:18

4 A Figure 16 is a patent drawing, not a 01:29:22

5 manufacturing drawing. 01:29:25

6 Q And in paragraph 44 it says that "Minor 01:29:25

7 differences measured are within the 01:29:29

8 manufacturing tolerances." 01:29:31

9 Did I read that correctly? 01:29:33

10 A 44 states that "Moreover, a POSITA would have 01:29:37

11 understood the minor differences measured by 01:29:40

12 Dr. Cameron were within manufacturing 01:29:42

13 tolerances and not indicative of intentional 01:29:44

14 asymmetric design." 01:29:46

15 Q If you would turn back to Offord -- never 01:29:54

16 mind. 01:29:58

17 MR. THOMAS: I have no further 01:30:07

18 questions, so I'll pass the witness. 01:30:08

19 MR. CUNNINGHAM: No questions here. 01:30:12

20 MR. THOMAS: Then we are complete. 01:30:14

21 (Proceedings concluded at 1:30 p.m.) 01:30:15

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1 STATE OF WISCONSIN)
) SS:
2 COUNTY OF MILWAUKEE)

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4 I, Dawn M. Lahti, RPR, CRR and Notary
5 Public in and for the State of Wisconsin, do
6 hereby certify that the preceding deposition
7 was recorded by me and reduced to writing under
8 my personal direction.

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9 I further certify that I am not a
10 relative or employee or attorney or counsel of
11 any of the parties, or a relative or employee
12 of such attorney or counsel, or financially
13 interested directly or indirectly in this
14 action.

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15 In witness whereof, I have hereunder
16 set my hand and affixed my seal of office on
17 this 5th day of August, 2026.

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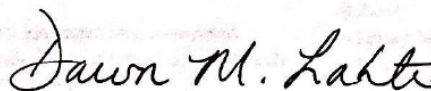
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22 _____
DAWN M. LAHTI, RPR/CRR

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23 Notary Public

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24 In and for the State of Wisconsin

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01:30:16

My commission expires April 16, 2028

25 01:30:16

01:30:16

Georgia Code
Title 9, Chapter 11
Article 5, Section 9-11-30

(e) Review by witness; changes; signing.

If requested by the deponent or a party before completion of the deposition, the deponent shall have 30 days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph (1) of subsection (f) of this Code section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed. If the deposition is not reviewed and signed by the witness within 30 days of its submission to him or her, the officer shall sign it and state on the record that the deposition was not reviewed and signed by the deponent within 30 days. The deposition may then be used as fully as though signed unless, on a motion to suppress under paragraph (4) of subsection (d) of Code

Section 9-11-32, the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

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VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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