

13:12:40

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AGS LIGHTING MANAGEMENT LLC,)
)
 Plaintiff,)
) C.A. No. 25-141 (MN)
 v.)
)
 JESCO LIGHTING GROUP, LLC,)
)
 Defendant.)

Thursday, July 24, 2025
2:06 p.m.
Motion Hearing

844 King Street
Wilmington, Delaware

BEFORE: THE HONORABLE MARYELLEN NOREIKA
United States District Court Judge

APPEARANCES:

SHAW KELLER LLP
BY: ANDREW E. RUSSELL, ESQ.

-and-

CADWELL CLONTS REEDER & THOMAS LLP
BY: BRAD BOWLING, ESQ.
BY: LISA THOMAS, ESQ.

Counsel for the Plaintiff

1 APPEARANCES CONTINUED:

2

MORRIS NICHOLS ARSHT & TUNNELL LLP

3

BY: JEREMY A. TIGAN, ESQ.

4

BY: JOSEPH YENERALL, ESQ.

5

-and-

6

RADULESCU LLP

7

BY: BRYON WASSERMAN, ESQ.

8

Counsel for the Defendant

9

10

11

COURTROOM DEPUTY: All rise. The United States

12

District Court for the District of Delaware is now in

13:55:47 13

session. The Honorable Maryellen Noreika presiding.

14:06:52 14

THE COURT: All right. Good afternoon,

14:06:56 15

everyone. Please be seated. Start with some brief

14:07:00 16

introductions.

14:07:01 17

MR. RUSSELL: Good afternoon, Your Honor.

14:07:05 18

Andrew Russell from Shaw Keller for plaintiff, AGS Lighting

14:07:10 19

Management LLC. And with me are my co-counsel, Brad Bowling

14:07:14 20

and Lisa Thomas from Cadwell Clonts Reeder & Thomas LLC.

14:07:19 21

THE COURT: All right. Mr. Tigan.

14:07:22 22

MR. TIGAN: Good afternoon, Your Honor. Jeremy

14:07:25 23

Tigan with Morris Nichols on behalf of the defendant. I am

14:07:29 24

joined by my co-counsel, Bryan Wasserman of Radulescu LLP,

14:07:33 25

and with my associate as well, Benjamin Yenerall.

14:07:37 1 Mr. Wasserman is prepared to present our
14:07:39 2 argument.

14:07:39 3 THE COURT: Thank you. Welcome to all of you.

14:07:41 4 All right. So we have read through the papers.
14:07:45 5 I thought I would give you all an opportunity to tell me
14:07:50 6 anything else you want me to know. I will say that I think
14:07:54 7 anyone who knows me knows that my standards for allowing
14:08:00 8 particularly direct pleading, direct infringement
14:08:05 9 allegations to go forward is not terribly high. So you're
14:08:11 10 going to have to convince me that you are the exceptional
14:08:15 11 case.

14:08:23 12 MR. WASSERMAN: Thank you, Your Honor.

14:08:26 13 Go to the first slide, Jeremy.

14:08:30 14 Right. So just briefly to summarize, we don't
14:08:33 15 believe AGS has pled direct infringement, indirect
14:08:36 16 infringement, or willful infringement. And we'll kind of
14:08:40 17 cut ahead to the substance of the argument.

14:08:43 18 Could you skip ahead two slides.

14:08:45 19 So we've identified three limitations where we
14:08:49 20 do not think they have pled the underlying facts necessary
14:08:52 21 to move ahead with their complaint. They haven't given us
14:08:55 22 fair notice of their infringement theory, and you know, we
14:08:59 23 think that the complaint should be dismissed --

14:09:02 24 THE COURT: I mean, the Federal Circuit has
14:09:04 25 cases out there that say you don't even need to go through

14:09:08 1 and say each element is in the claims. So what is it that
14:09:14 2 you want them to do that is sufficient but not, you know, a
14:09:21 3 contention interrogatory response?

14:09:23 4 MR. WASSERMAN: So, I mean, the Federal Circuit
14:09:25 5 has had cases where very simple technology --

14:09:29 6 THE COURT: No, you know, I get it, but I have
14:09:31 7 never really believed like the whole that you have to have
14:09:35 8 this super simple technology. I mean, I get it that the
14:09:40 9 Court, you know, has sort of made comments like look,
14:09:44 10 enough, it's easy technology, anyone would understand it.
14:09:46 11 But that's not a rule that I understand.

14:09:49 12 And so what I didn't understand from your
14:09:51 13 pleadings is what exactly you say that they would need to
14:09:56 14 do. And it sounded to me like if I asked you that question,
14:09:59 15 you would say well, basically you have to give me an
14:10:02 16 infringement contention. And that can't possibly be the
14:10:05 17 standard.

14:10:05 18 MR. WASSERMAN: Well, I mean, looking at the
14:10:07 19 Federal Circuit's precedent in *Bot M8*, I don't know that it
14:10:10 20 has to be infringement contentions, but it does need to give
14:10:17 21 fair notice of what the theory of infringements are, what
14:10:19 22 the infringing elements are. I do think that under the
14:10:22 23 Court's later precedent there is a narrowing of this space
14:10:26 24 between what is required in a complaint and what's required
14:10:28 25 in an infringement contention.

14:10:30 1 THE COURT: I would say just the opposite in the
14:10:32 2 more recent cases, I really would. But I mean, it could be
14:10:37 3 wrong and you can try and make me believe that, but I mean,
14:10:43 4 I just -- I don't see that you have to come anywhere close
14:10:51 5 to alleging what you would need in an infringement
14:10:55 6 contention. And I'm not saying that if the case were to go
14:10:59 7 forward you couldn't expect early and detailed infringement
14:11:05 8 contention, I don't understand the basis for saying it's
14:11:07 9 legally required in connection with pleadings.

14:11:12 10 MR. WASSERMAN: Well, I mean, certainly the
14:11:13 11 Federal Circuit's holdings in *Bot M8* I think do at the very
14:11:21 12 least lean toward the very -- a high --

14:11:24 13 THE COURT: I have no doubt that some federal
14:11:28 14 circuit holdings suggest a higher standard, some federal
14:11:32 15 circuits suggest a significantly lower standard. And given
14:11:34 16 that we're talking about dismissing a complaint, I tend to
14:11:44 17 look towards the substantial, rather substantial number of
14:11:50 18 cases that suggest you don't have to get anywhere near
14:11:54 19 approaching a contention in order to sufficiently state a
14:11:59 20 claim, or plausibly state a claim.

14:12:02 21 MR. WASSERMAN: I mean, I guess as I said, you
14:12:05 22 know, I think that *Bot M8* is probably the closest analog
14:12:09 23 given that this is technology that is not purely physical
14:12:13 24 technology, or it is not purely observational based on
14:12:17 25 looking at an infringing device and knowing automatically

14:12:21 1 what's present in it. And, you know, particularly we are
14:12:25 2 entitled I think to know at this stage what they think the
14:12:30 3 infringing elements are.

14:12:32 4 You know, if you could jump to slide 5.

14:12:43 5 So we don't know -- they don't identify what the
14:12:46 6 first plurality of LEDs are. They don't identify what the
14:12:51 7 first linear shape is. They don't define what the second
14:12:56 8 plurality of LEDs are. They don't identify the second
14:12:59 9 linear shape. These are recited claim elements. They are
14:13:02 10 not identified at all in the pleadings. I think in an
14:13:07 11 amended pleading we would want something that includes more
14:13:11 12 detail --

14:13:12 13 THE COURT: Like what? That's what I'm trying
14:13:14 14 to understand so if I make them go back and replead and they
14:13:17 15 say it has this second plurality, do you need them to say
14:13:22 16 and in this particular model the second plurality is met by
14:13:26 17 this, and it is configured to produce a second light having
14:13:30 18 a second color temperature because of this and that
14:13:33 19 temperature is red in this device and it, blah, blah, blah,
14:13:38 20 you think that level of detail is required to adequately
14:13:41 21 plead direct infringement?

14:13:43 22 MR. WASSERMAN: I think I would -- we would be
14:13:45 23 entitled to know what the --

14:13:46 24 THE COURT: Tell me what it is that you would
14:13:48 25 need because I don't know. And it seems unfair if I were to

14:13:52 1 grant this that none of us know what is adequate so that we
14:13:56 2 could avoid having a second go around at a motion to
14:14:01 3 dismiss. So help me out here.

14:14:02 4 MR. WASSERMAN: Understood, Your Honor. I guess
14:14:04 5 identification of what the -- which LEDs they say are the
14:14:07 6 first plurality. LEDs, which LEDs they think are the second
14:14:12 7 plurality, and what the first and second linear shapes are.

14:14:22 8 THE COURT: Okay.

14:14:23 9 MR. WASSERMAN: So if you could move ahead to
14:14:25 10 the next slide. A few more slides up.

14:14:32 11 So once again, we have the second switch
14:14:36 12 configured to cause one of the plurality of currents to
14:14:40 13 couple the first plurality of LEDs, the second plurality of
14:14:43 14 LEDs, or both. I would want some identification of, you
14:14:47 15 know, what they consider -- what functionality, what, you
14:14:51 16 know, actual thing happening in the circuit they consider to
14:14:55 17 be the coupling. And once again, it's impossible to kind of
14:14:59 18 even understand what is being alleged here because we don't
14:15:03 19 even know what the first and second plurality of LEDs are
14:15:06 20 because they didn't identify them for the first claim
14:15:09 21 element.

14:15:09 22 And so I guess that would be what we would
14:15:12 23 contend is the minimum level of detail we could expect to
14:15:15 24 see -- we would be entitled to see in a complaint.

14:15:18 25 And so I will -- we do have some citations to

14:15:26 1 Bot M8, I know you're familiar with the case law. And so I
14:15:30 2 will move ahead quickly to the willful and induced
14:15:35 3 infringement and this question of notice and whatnot. Their
14:15:41 4 basis for induced infringement and willful infringement is
14:15:44 5 this October 31st, 2023 letter. The letter accused a
14:15:51 6 different product without -- it had different features that
14:15:55 7 are different from the ones that are in this complaint. We
14:15:59 8 wrote back to them -- no explanation of how we infringe. We
14:16:06 9 wrote back to them -- I'm sorry, Jeremy, could you move to
14:16:09 10 slide 12.

14:16:11 11 This is their letter. It refers to the LIN
14:16:14 12 product. And then on slide 13 we have our response.
14:16:21 13 Basically we said it is missing this element that is a
14:16:25 14 driver circuit configured to output a plurality of currents.
14:16:29 15 And particularly what I understand them to be mapping that
14:16:32 16 to in the complaint is this -- actually I'm sorry, Jeremy,
14:16:39 17 could you move ahead to the next slide.

14:16:41 18 So in the complaint they accuse this product
14:16:45 19 which is different which is the LIN SLIM, and particularly,
14:16:52 20 the next slide, they point to this white output selector
14:16:58 21 that has the ability to control the brightness. I
14:17:03 22 understand from what I can glean from the complaint that
14:17:06 23 they contend this to be the switch that controls the
14:17:10 24 plurality of currents. And this is not on the product that
14:17:16 25 they originally accused.

14:17:19 1 You know, I noticed in their slide material they
14:17:22 2 contend the products are the same. They are not. And
14:17:26 3 particularly this feature that they have accused in this
14:17:30 4 complaint was not in the product that they originally
14:17:32 5 accused. So we have this fine line where they say this LIN
14:17:37 6 product infringes, we wrote back and said no, it doesn't,
14:17:40 7 it's missing this element, we're happy to discuss it with
14:17:43 8 you. Nothing happens for ten months. And we get this
14:17:47 9 complaint that accuses the product with different
14:17:50 10 functionality and accuses that different functionality in
14:17:53 11 the complaint.

14:17:53 12 So we don't think that this really establishes
14:17:58 13 the necessary notice for willful or induced infringement.
14:18:03 14 And as far as we were concerned, we explained why we didn't
14:18:06 15 infringe. We didn't receive any rebuttal from them. And
14:18:10 16 this complaint is consistent with this idea that we didn't
14:18:14 17 infringe.

14:18:15 18 THE COURT: Okay.

14:18:22 19 MR. WASSERMAN: And so that's, I guess, the
14:18:26 20 summary of our main points. We would be happy to answer any
14:18:29 21 questions. If not, I would like to reserve the rest of my
14:18:32 22 time for rebuttal.

14:18:33 23 THE COURT: Great. Thank you.

14:18:35 24 All right. Help me out with the LIN versus the
14:18:37 25 LIN SLIM. I mean, it is getting a little confusing, and I

14:18:41 1 don't know if you're changing your theories or what you're
14:18:45 2 doing or what you're accusing. It seems LIN SLIM is in the
14:18:50 3 complaint, LIN is in the letter. So what's going on?

14:18:53 4 MR. BOWLING: Good afternoon, Your Honor. Brad
14:18:55 5 Bowling for AGS.

14:18:57 6 Let me refer you to Exhibit 6 of our complaint.
14:19:02 7 Can I get the Elmo. This is a printout from the Jesco
14:19:09 8 website listing the LIN LED linear system. This is an
14:19:16 9 entire product line called LIN. There is LINs that have
14:19:20 10 bigger dimensions and there are LINs that have smaller
14:19:24 11 dimensions. The ones with smaller dimensions as you go down
14:19:29 12 this page are identified as the LIN SLIM.

14:19:31 13 THE COURT: What's being accused of infringement
14:19:33 14 in this case?

14:19:34 15 MR. BOWLING: The entire product line is accused
14:19:36 16 of infringement, Your Honor. If we go to paragraph 23, in
14:19:46 17 paragraph 23, the first line here, it was not highlighted,
14:19:50 18 says -- excuse me, modular lighting fixtures with adjustable
14:19:57 19 color temperature and brightness. We accuse all of them
14:20:00 20 that have this functionality. And clear, we say that one
14:20:05 21 such example is the LIN SLIM.

14:20:06 22 THE COURT: Is that enough to put them on notice
14:20:09 23 for inducement and willful infringement of other products?
14:20:17 24 You need to be able to show knowledge of the patent and
14:20:19 25 knowledge of infringement. If you just give an example of

14:20:24 1 one and he says what you accused in the letter doesn't even
14:20:27 2 exist in the currently accused products, so their products
14:20:31 3 aren't all the same and you don't ever say all these
14:20:33 4 products are identical. So what are we supposed to do?

14:20:37 5 MR. BOWLING: In the letter, Your Honor, we
14:20:39 6 accused the entire product line.

14:20:42 7 THE COURT: And he says we came back and said
14:20:44 8 there is no driver. And now you come in and you say here is
14:20:48 9 a driver. And he said but that driver is not in the
14:20:54 10 products that you accused of infringement in the letter.

14:20:57 11 MR. BOWLING: He says that the switches in the
14:21:00 12 LIN SLIM are on the device and on the device is doing a lot
14:21:05 13 -- is carrying a lot of water in that statement. The
14:21:08 14 switches may be elsewhere in some of the other LIN products,
14:21:11 15 but they are still accused and they can still be met by the
14:21:15 16 claim.

14:21:15 17 There is nothing in the claim that requires a
14:21:18 18 specific colocation of the switch on the product or outside
14:21:23 19 of the product. And frankly it was not the basis for their
14:21:26 20 alleged non-infringement pre-suit.

14:21:29 21 THE COURT: Okay. What is the time period -- so
14:21:32 22 is the time period for which your client is asserting
14:21:36 23 inducement and willful infringement from October 31st of
14:21:41 24 2023?

14:21:41 25 MR. BOWLING: Yes, Your Honor.

14:21:42 1 THE COURT: And is that the entirety of the time
14:21:45 2 of infringement or -- I don't know when the patent issued on
14:21:49 3 or when they began selling products.

14:21:51 4 MR. BOWLING: The letter was sent shortly after,
14:21:53 5 I believe within two -- the patent issued on September 5th.
14:21:59 6 So we contacted them shortly after, so infringement
14:22:02 7 technically begins a little -- almost two months beforehand,
14:22:05 8 but for the majority of the patent's lifetime they have been
14:22:09 9 under notice.

14:22:10 10 THE COURT: Okay. Anything else?

14:22:25 11 MR. WASSERMAN: Yeah, I would just reiterate
14:22:31 12 that that letter does not say that they are accusing the
14:22:34 13 entire LIN series or LIN family of products, it says it's
14:22:38 14 including -- accusing the -- something, I'm blanking on the
14:22:43 15 particular wording, something considerably narrower than
14:22:47 16 that.

14:22:47 17 THE COURT: Can we see what it actually says?

14:22:55 18 MR. WASSERMAN: So it says the LIN product,
14:22:57 19 singular.

14:22:57 20 THE COURT: So --

14:22:59 21 MR. WASSERMAN: So I think that the -- we're not
14:23:02 22 psychic. I don't know what they meant at the time.

14:23:04 23 I'm sorry, Your Honor, I cut you off.

14:23:06 24 THE COURT: You knew enough about what they said
14:23:09 25 at the time to know that there was no infringement, at least

14:23:11 1 that's what you told me.

14:23:12 2 MR. WASSERMAN: I was going to preface by saying
14:23:15 3 we understood this at the time to be a specific unique
14:23:17 4 product, the product that we called the LIN. It didn't say
14:23:20 5 the LIN family of products including the LIN SLIM, it didn't
14:23:24 6 say everything, it said the LIN product. And now they're
14:23:27 7 kind of saying this actually covered the LIN series of
14:23:32 8 products including the LIN SLIM. What appears in the
14:23:36 9 complaint is the LIN SLIM, the functionality that they
14:23:40 10 accuse is only in the LIN SLIM. They point to this switch
14:23:45 11 assembly limitation that they say is met by this combined
14:23:50 12 brightness control and color temperature that is on the LIN
14:23:54 13 SLIM. So I don't think it's -- you know, I started to say I
14:24:01 14 don't know internally what they meant at any given time, but
14:24:03 15 I think that the objective record suggest that they accused
14:24:07 16 one product, got a non-infringement defense and got an
14:24:11 17 explanation of why that didn't infringe and came back and
14:24:13 18 accused the different products in their complaint.

14:24:25 19 THE COURT: Okay. All right. Thank you.

14:24:28 20 So I have before me Defendant's motion to
14:24:34 21 dismiss the Complaint pursuant to Rule 12(b)(6) for failure
14:24:40 22 to state a claim that the '302 Patent is directly infringed,
14:24:49 23 that Defendant induced infringement or that infringement is
14:24:56 24 willful. I also have Plaintiff's motion for leave to file a
14:25:01 25 sur-reply to Defendant's motion to dismiss. In the motion

14:25:06 1 to dismiss, Defendant argues that the Complaint fails to
14:25:08 2 plead "facts showing that key limitations" of the patent at
14:25:12 3 issue are present, and that the Complaint fails to plead
14:25:16 4 knowledge of infringement and intent to infringe which would
14:25:29 5 be required for inducement and willful infringement.

14:25:32 6 So I am going to deny the motion to dismiss. I
14:25:39 7 think everybody knows the legal standard. I accept all
14:25:41 8 well-pleaded factual allegations in the Complaint as true
14:25:44 9 and view them in the light most favorable to the plaintiff.
14:25:47 10 I have to, however, dismiss any claims that fail as a matter
14:25:53 11 of law or do not contain sufficient factual matter to state
14:25:57 12 a claim that is plausible on its face.

14:26:00 13 First, direct infringement. To state a claim
14:26:01 14 for direct infringement, the Complaint must allege facts
14:26:04 15 that plausibly indicate that the accused products contain
14:26:07 16 each of the limitations found in the claim[s]. That being
14:26:09 17 said, the Federal Circuit has recently reiterated that "[a]
14:26:11 18 plaintiff is not required to plead infringement on an
14:26:15 19 element-by-element basis. Instead, it is enough that a
14:26:19 20 complaint place the alleged infringer on notice of what
14:26:22 21 activity is being accused of infringement." And that is the
14:26:26 22 *Bot M8 LLC v. Sony Corp. of America*, 4 F.4th 1342 (Fed. Cir.
14:26:33 23 2021) case. In other words, there must be some factual
14:26:39 24 allegations that, when taken as true, articulate why it is
14:26:43 25 plausible that the accused product infringes the patent

claim.

Here, Defendant argues that the Complaint does not allege sufficient details to put it on notice of infringement. I disagree. The Complaint identifies a group of accused products, including a specific example product, and the specific claims in the '302 Patent that Defendant allege directly infringe, either literally or under the doctrine of equivalents. The Complaint also states how the Defendant's LIN SLIM product allegedly infringes. The Complaint alleges that Defendant's accused product meets each limitation of at least claim 1 of the '302 Patent, providing several photos and videos to allege how each limitation is met - including for the first and second plurality of LEDs and circuit arrangements that Defendant argues are absent from the Complaint. I find that these allegations sufficiently state a claim of direct infringement and adequately put Defendant on notice of AGS's claims against it.

Next, we have induced infringement, which requires pleading knowledge of the patent . . . and knowledge of patent infringement. For an allegation of induced infringement to survive a motion to dismiss, a complaint must plead facts plausibly showing that the accused infringer specifically intended [another party] to infringe [the patent] and knew that the [other party]'s acts

constituted infringement.

Here, the Complaint adequately does so. It alleges that "Jesco has been on notice of the '302 Patent and on information and belief, its infringement of that patent, before the filing of this Complaint and since no later than the time of AGS Lighting's October 31, 2023, letter." Jesco challenges the sufficiency of the letter in providing notice, but does not dispute that it received the letter. Although the notice letter states "LIN" in reference to the accused products where the Complaint identifies the LIN SLIM as an example, the Complaint also begins by accusing Defendant's LIN product line as a whole. I think the letter is sufficient at this stage in that it notifies Defendant of the patent-at-issue and identifies Defendant's LIN SLIM line. Alongside this, Defendant argues that the Complaint itself cannot provide notice of infringement. But I don't think that's actually something that they are required to get to. First of all, I will allow a complaint where it's their first complaint and is later amended to constitute notice of infringement. But in any event, I think that the notice letter for now is sufficient.

I think the Complaint also adequately alleges the requisite intent to induce infringement of the '302 Patent by stating that "Jesco directs, instructs, and

14:29:29 1 supports its customers, for using the Accused Jesco Products
14:29:32 2 through personal sales, videos, and the installation guide
14:29:35 3 shown above" and "Jesco documentation and videos direct
14:29:41 4 users to connect the Accused Jesco Products together in
14:29:45 5 modular arrangements . . . [and] to deliver different
14:29:47 6 amounts of current to the LED arrays of the Accused Jesco
14:29:51 7 Products by adjusting one or both of the brightness and/or
14:29:54 8 color temperature of the Accused Jesco Products." I think
14:29:56 9 these allegations together are sufficient to withstand the
14:29:59 10 motion to dismiss on inducement.

14:30:02 11 And finally, in stating a claim for willful
14:30:05 12 infringement, the complaint must allege that the accused
14:30:07 13 infringer knew of the asserted patent, and knowingly or
14:30:11 14 intentionally infringed the patent after acquiring that
14:30:14 15 knowledge. Plaintiff can meet the knowledge requirement by
14:30:15 16 showing willful blindness, which requires the patentee to
14:30:19 17 show not only that the accused subjectively believed that
14:30:21 18 there was a high risk of infringement, but also that the
14:30:25 19 accused took deliberate actions to avoid confirming
14:30:30 20 infringement.

14:30:32 21 All that being said, as I already said in
14:30:35 22 discussing induced infringement, Plaintiff's allegations are
14:30:39 23 sufficient with respect to Defendant's awareness of the '302
14:30:42 24 Patent and that its LIN product line infringes, or allegedly
14:30:46 25 infringes the '302 Patent.

14:30:48 1 So I am going to deny the motion with respect to
14:30:50 2 willfulness and inducement as well. So Defendant's motion
14:30:55 3 to dismiss is denied.

14:30:57 4 Lastly, Plaintiff's request for leave to file a
14:31:01 5 sur-reply. I'm going to deny that. I didn't rely on any of
14:31:06 6 the grounds or that statement that Plaintiff wanted to
14:31:09 7 respond to in answering the Defendant's reply.

14:31:15 8 That's where we are. Anything else that we need
14:31:17 9 to discuss while we're here?

14:31:23 10 MR. WASSERMAN: No, Your Honor.

14:31:24 11 MR. BOWLING: No, Your Honor. Thank you.

14:31:26 12 THE COURT: Do we have a schedule in this case?

14:31:29 13 MR. BOWLING: No, we don't.

14:31:30 14 THE COURT: We'll send something out asking you
14:31:32 15 to confer and get back to us with a schedule.

14:31:35 16 MR. BOWLING: Thank you.

14:31:36 17 THE COURT: Thank you. Safe travels.

14:31:38 18 COURTROOM DEPUTY: All rise. Court is
14:31:40 19 adjourned.

20 (Court adjourned at 2:31 p.m.)

21 I hereby certify the foregoing is a true and
22 accurate transcript from my stenographic notes in the proceeding.

23 /s/ Dale C. Hawkins
14:24:25 24 Official Court Reporter
14:24:25 25 U.S. District Court

'302 [7] - 13:22, 15:6, 15:11, 16:3, 16:24, 17:23, 17:25	accused [23] - 8:5, 8:25, 9:3, 9:5, 10:13, 10:15, 11:1, 11:2, 11:6, 11:10, 11:15, 13:15, 13:18, 14:15, 14:21, 14:25, 15:5, 15:10, 15:24, 16:10, 17:12, 17:17, 17:19 Accused [4] - 17:1, 17:4, 17:6, 17:8 accuses [2] - 9:9, 9:10 accusing [4] - 10:2, 12:12, 12:14, 16:12 acquiring [1] - 17:14 actions [1] - 17:19 activity [1] - 14:21 acts [1] - 15:25 actual [1] - 7:16 adequate [1] - 7:1 adequately [4] - 6:20, 15:17, 16:2, 16:23 adjourned [2] - 18:19, 18:20 adjustable [1] - 10:18 adjusting [1] - 17:7 afternoon [4] - 2:14, 2:17, 2:22, 10:4 AGS [5] - 1:4, 2:18, 3:15, 10:5, 16:6 AGS's [1] - 15:17 ahead [6] - 3:17, 3:18, 3:21, 7:9, 8:2, 8:17 allegation [1] - 15:21 allegations [6] - 3:9, 14:8, 14:24, 15:16, 17:9, 17:22 allege [5] - 14:14, 15:3, 15:7, 15:12, 17:12 alleged [3] - 7:18, 11:20, 14:20 allegedly [2] - 15:9, 17:24 alleges [3] - 15:10, 16:3, 16:23 alleging [1] - 5:5 allow [1] - 16:19 allowing [1] - 3:7 almost [1] - 12:7 alongside [1] - 16:15 amended [2] - 6:11, 16:20 America [1] - 14:22 amounts [1] - 17:6 analog [1] - 5:22 ANDREW [1] - 1:20 Andrew [1] - 2:18 answer [1] - 9:20 answering [1] - 18:7 APPEARANCES [2] -	1:18, 2:1 approaching [1] - 5:19 argues [4] - 14:1, 15:2, 15:15, 16:15 argument [2] - 3:2, 3:17 arrangements [2] - 15:14, 17:5 arrays [1] - 17:6 ARSHT [1] - 2:2 articulate [1] - 14:24 assembly [1] - 13:11 asserted [1] - 17:13 asserting [1] - 11:22 associate [1] - 2:25 automatically [1] - 5:25 avoid [2] - 7:2, 17:19 awareness [1] - 17:23	C	15:23, 16:19, 17:12 concerned [1] - 9:14 confer [1] - 18:15 configured [3] - 6:17, 7:12, 8:14 confirming [1] - 17:19 confusing [1] - 9:25 connect [1] - 17:4 connection [1] - 5:9 consider [2] - 7:15, 7:16 considerably [1] - 12:15 consistent [1] - 9:16 constitute [1] - 16:20 constituted [1] - 16:1 contacted [1] - 12:6 contain [2] - 14:11, 14:15 contend [3] - 7:23, 8:23, 9:2 contention [6] - 4:3, 4:16, 4:25, 5:6, 5:8, 5:19 contentions [1] - 4:20 CONTINUED [1] - 2:1 control [2] - 8:21, 13:12 controls [1] - 8:23 convince [1] - 3:10 Corp [1] - 14:22 counsel [2] - 2:19, 2:24 Counsel [2] - 1:24, 2:7 couple [1] - 7:13 coupling [1] - 7:17 court [1] - 18:18 COURT [26] - 1:1, 2:14, 2:21, 3:3, 3:24, 4:6, 5:1, 5:13, 6:13, 6:24, 7:8, 9:18, 9:23, 10:13, 10:22, 11:7, 11:21, 12:1, 12:10, 12:17, 12:20, 12:24, 13:19, 18:12, 18:14, 18:17 Court [6] - 1:15, 2:12, 4:9, 18:20, 18:23, 18:24 Court's [1] - 4:23 COURTROOM [2] - 2:11, 18:18 covered [1] - 13:7 current [1] - 17:6 currents [3] - 7:12, 8:14, 8:24 customers [1] - 17:1 cut [2] - 3:17, 12:23
/		B		
/s [1] - 18:23				
1				
1 [1] - 15:11 12 [1] - 8:10 12(b)(6) [1] - 13:21 13 [1] - 8:12 1342 [1] - 14:22				
2				
2021 [1] - 14:23 2023 [3] - 8:5, 11:24, 16:6 2025 [1] - 1:10 23 [2] - 10:16, 10:17 24 [1] - 1:10 25-141(MN) [1] - 1:5 2:06 [1] - 1:10 2:31 [1] - 18:20	based [1] - 5:24 basis [4] - 5:8, 8:4, 11:19, 14:19 BEFORE [1] - 1:15 beforehand [1] - 12:7 began [1] - 12:3 begins [2] - 12:7, 16:12 behalf [1] - 2:23 belief [1] - 16:4 Benjamin [1] - 2:25 between [1] - 4:24 bigger [1] - 10:10 blah [3] - 6:19 blanking [1] - 12:14 blindness [1] - 17:16 Bot [5] - 4:19, 5:11, 5:22, 8:1, 14:22 Bowling [2] - 2:19, 10:5 BOWLING [10] - 1:22, 10:4, 10:15, 11:5, 11:11, 11:25, 12:4, 18:11, 18:13, 18:16 Brad [2] - 2:19, 10:4 BRAD [1] - 1:22 brief [1] - 2:15 briefly [1] - 3:14 brightness [4] - 8:21, 10:19, 13:12, 17:7 Bryan [1] - 2:24 BRYON [1] - 2:6 BY [5] - 1:20, 1:22, 1:23, 2:3, 2:6	C.A [1] - 1:5 Cadwell [1] - 2:20 CADWELL [1] - 1:22 cannot [1] - 16:16 carrying [1] - 11:13 case [6] - 3:11, 5:6, 8:1, 10:14, 14:23, 18:12 cases [4] - 3:25, 4:5, 5:2, 5:18 certainly [1] - 5:10 certify [1] - 18:21 challenges [1] - 16:7 changing [1] - 10:1 Cir [1] - 14:22 Circuit [3] - 3:24, 4:4, 14:17 circuit [4] - 5:14, 7:16, 8:14, 15:14 Circuit's [2] - 4:19, 5:11 circuits [1] - 5:15 citations [1] - 7:25 claim [13] - 5:20, 6:9, 7:20, 11:16, 11:17, 13:22, 14:12, 14:13, 15:1, 15:11, 15:16, 17:11 claim[s] [1] - 14:16 claims [4] - 4:1, 14:10, 15:6, 15:18 clear [1] - 10:20 client [1] - 11:22 CLONTS [1] - 1:22 Clonts [1] - 2:20 close [1] - 5:4 closest [1] - 5:22 co [2] - 2:19, 2:24 co-counsel [2] - 2:19, 2:24 colocation [1] - 11:18 color [4] - 6:18, 10:19, 13:12, 17:8 combined [1] - 13:11 comments [1] - 4:9 Complaint [16] - 13:21, 14:1, 14:3, 14:8, 14:14, 15:2, 15:4, 15:8, 15:10, 15:15, 16:2, 16:5, 16:10, 16:11, 16:16, 16:23 complaint [22] - 3:21, 3:23, 4:24, 5:16, 7:24, 8:7, 8:16, 8:18, 8:22, 9:4, 9:9, 9:11, 9:16, 10:3, 10:6, 13:9, 13:18, 14:20,		
3				
31 [1] - 16:6 31st [2] - 8:5, 11:23				
4				
4 [1] - 14:22				
5				
5 [1] - 6:4 5th [1] - 12:5				
6				
6 [1] - 10:6				
8				
844 [1] - 1:12				
A				
ability [1] - 8:21 able [1] - 10:24 absent [1] - 15:15 accept [1] - 14:7 accurate [1] - 18:21 accuse [3] - 8:18, 10:19, 13:10				

D	11:9	few [1] - 7:10	identified [3] - 3:19, 6:10, 10:12	introductions [1] - 2:16
	E	file [2] - 13:24, 18:4	identifies [3] - 15:4, 16:11, 16:14	issue [2] - 14:3, 16:14
	early [1] - 5:7	filing [1] - 16:5	identify [4] - 6:5, 6:6, 6:8, 7:20	issued [2] - 12:2, 12:5
	easy [1] - 4:10	finally [1] - 17:11	impossible [1] - 7:17	itself [1] - 16:16
Defendant [10] - 1:8, 2:7, 13:23, 14:1, 15:2, 15:6, 15:14, 15:17, 16:14, 16:15	either [1] - 15:7	fine [1] - 9:5	IN [1] - 1:1	Jeremy [4] - 2:22, 3:13, 8:9, 8:16
defendant [1] - 2:23	element [6] - 4:1, 7:21, 8:13, 9:7, 14:19	first [13] - 3:13, 6:6, 6:7, 7:6, 7:7, 7:13, 7:19, 7:20, 10:17, 14:13, 15:13, 16:18, 16:19	includes [1] - 6:11	JEREMY [1] - 2:3
Defendant's [9] - 13:20, 13:25, 15:9, 15:10, 16:12, 16:15, 17:23, 18:2, 18:7	element-by-element [1] - 14:19	fixtures [1] - 10:18	including [5] - 12:14, 13:5, 13:8, 15:5, 15:13	Jesco [9] - 10:7, 16:3, 16:7, 16:25, 17:1, 17:3, 17:4, 17:6, 17:8
defense [1] - 13:16	elements [3] - 4:22, 6:3, 6:9	FOR [1] - 1:2	indicate [1] - 14:15	JESCO [1] - 1:7
define [1] - 6:7	Elmo [1] - 10:7	foregoing [1] - 18:21	indirect [1] - 3:15	joined [1] - 2:24
DELAWARE [1] - 1:2	elsewhere [1] - 11:14	forward [2] - 3:9, 5:7	induce [1] - 16:24	JOSEPH [1] - 2:3
Delaware [2] - 1:13, 2:12	entire [4] - 10:9, 10:15, 11:6, 12:13	frankly [1] - 11:19	induced [7] - 8:2, 8:4, 9:13, 13:23, 15:19, 15:22, 17:22	Judge [1] - 1:15
deliberate [1] - 17:19	entirety [1] - 12:1	functionality [5] - 7:15, 9:10, 10:20, 13:9	inducement [5] - 10:23, 11:23, 14:5, 17:10, 18:2	July [1] - 1:10
deliver [1] - 17:5	entitled [3] - 6:2, 6:23, 7:24	G	information [1] - 16:4	jump [1] - 6:4
denied [1] - 18:3	equivalents [1] - 15:8	given [4] - 3:21, 5:15, 5:23, 13:14	infringe [7] - 8:8, 9:15, 9:17, 13:17, 14:4, 15:7, 15:25	K
deny [3] - 14:6, 18:1, 18:5	ESQ [6] - 1:20, 1:22, 1:23, 2:3, 2:3, 2:6	glean [1] - 8:22	infringed [2] - 13:22, 17:14	Keller [1] - 2:18
DEPUTY [2] - 2:11, 18:18	establishes [1] - 9:12	grant [1] - 7:1	infringement [48] - 3:8, 3:15, 3:16, 3:22, 4:16, 4:20, 4:25, 5:5, 5:7, 6:21, 8:3, 8:4, 9:13, 10:13, 10:16, 10:23, 10:25, 11:10, 11:20, 11:23, 12:2, 12:6, 12:25, 13:16, 13:23, 14:4, 14:5, 14:13, 14:14, 14:18, 14:21, 15:4, 15:17, 15:19, 15:21, 15:22, 16:1, 16:4, 16:17, 16:20, 16:24, 17:12, 17:18, 17:20, 17:22	KELLER [1] - 1:19
detail [3] - 6:12, 6:20, 7:23	event [1] - 16:21	great [1] - 9:23	infringements [1] - 4:21	key [1] - 14:2
detailed [1] - 5:7	exactly [1] - 4:13	grounds [1] - 18:6	infringer [3] - 14:20, 15:24, 17:13	kind [3] - 3:16, 7:17, 13:7
details [1] - 15:3	example [4] - 10:21, 10:25, 15:5, 16:11	GROUP [1] - 1:7	infringes [5] - 9:6, 14:25, 15:9, 17:24, 17:25	King [1] - 1:12
device [4] - 5:25, 6:19, 11:12	exceptional [1] - 3:10	group [1] - 15:4	install [1] - 17:2	knowing [1] - 5:25
different [8] - 8:6, 8:7, 8:19, 9:9, 9:10, 13:18, 17:5	excuse [1] - 10:18	guess [4] - 5:21, 7:4, 7:22, 9:19	intended [1] - 15:24	knowingly [1] - 17:13
dimensions [3] - 10:10, 10:11	Exhibit [1] - 10:6	guide [1] - 17:2	intent [2] - 14:4, 16:24	knowledge [7] - 10:24, 10:25, 14:4, 15:20, 15:21, 17:15
direct [8] - 3:8, 3:15, 6:21, 14:13, 14:14, 15:16, 17:3	exist [1] - 11:2	H	intentionally [1] - 17:14	knows [3] - 3:7, 14:7
directly [2] - 13:22, 15:7	expect [2] - 5:7, 7:23	happy [2] - 9:7, 9:20	internally [1] - 13:14	L
directs [1] - 16:25	explained [1] - 9:14	Hawkins [1] - 18:23	interrogatory [1] - 4:3	lastly [1] - 18:4
disagree [1] - 15:4	explanation [2] - 8:8, 13:17	Hearing [1] - 1:11		law [2] - 8:1, 14:11
discuss [2] - 9:7, 18:9	F	help [2] - 7:3, 9:24		lean [1] - 5:12
discussing [1] - 17:22	F.4th [1] - 14:22	hereby [1] - 18:21		least [3] - 5:12, 12:25, 15:11
dismiss [9] - 7:3, 13:21, 13:25, 14:1, 14:6, 14:10, 15:22, 17:10, 18:3	face [1] - 14:12	high [3] - 3:9, 5:12, 17:18		leave [2] - 13:24, 18:4
dismissed [1] - 3:23	facts [4] - 3:20, 14:2, 14:14, 15:23	higher [1] - 5:14		LED [2] - 10:8, 17:6
dismissing [1] - 5:16	factual [3] - 14:8, 14:11, 14:23	highlighted [1] - 10:17		LEDs [9] - 6:6, 6:8, 7:5, 7:6, 7:13, 7:14, 7:19, 15:14
dispute [1] - 16:8	fail [1] - 14:10	holdings [2] - 5:11, 5:14		legal [1] - 14:7
DISTRICT [2] - 1:1, 1:2	fails [2] - 14:1, 14:3	Honor [11] - 2:17, 2:22, 3:12, 7:4, 10:4, 10:16, 11:5, 11:25, 12:23, 18:10, 18:11		legally [1] - 5:9
District [4] - 1:15, 2:12, 18:24	failure [1] - 13:21	HONORABLE [1] - 1:15		letter [15] - 8:5, 8:11, 10:3, 11:1, 11:5, 11:10, 12:4, 12:12, 16:7, 16:9, 16:13, 16:21
doctrine [1] - 15:8	fair [2] - 3:22, 4:21	Honorable [1] - 2:13		level [2] - 6:20, 7:23
documentation [1] - 17:3	familiar [1] - 8:1	I		lifetime [1] - 12:8
doubt [1] - 5:13	family [2] - 12:13, 13:5	idea [1] - 9:16		light [2] - 6:17, 14:9
down [1] - 10:11	far [1] - 9:14	identical [1] - 11:4		Lighting [1] - 2:18
driver [4] - 8:14, 11:8,	favorable [1] - 14:9	identification [2] - 7:5, 7:14		
	feature [1] - 9:3			
	features [1] - 8:6			
	Fed [1] - 14:22			
	federal [2] - 5:13, 5:14			
	Federal [5] - 3:24, 4:4, 4:19, 5:11, 14:17			

lighting [1] - 10:18 LIGHTING [2] - 1:4, 1:7 Lighting's [1] - 16:6 limitation [3] - 13:11, 15:11, 15:13 limitations [3] - 3:19, 14:2, 14:16 LIN [31] - 8:11, 8:19, 9:5, 9:24, 9:25, 10:2, 10:3, 10:8, 10:9, 10:12, 10:21, 11:12, 11:14, 12:13, 12:18, 13:4, 13:5, 13:6, 13:7, 13:8, 13:9, 13:10, 13:12, 15:9, 16:9, 16:11, 16:12, 16:15, 17:24 line [8] - 9:5, 10:9, 10:15, 10:17, 11:6, 16:12, 16:15, 17:24 linear [4] - 6:7, 6:9, 7:7, 10:8 LINS [2] - 10:9, 10:10 LISA [1] - 1:23 Lisa [1] - 2:20 listing [1] - 10:8 literally [1] - 15:7 LLC [5] - 1:4, 1:7, 2:19, 2:20, 14:22 LLP [5] - 1:19, 1:22, 2:2, 2:5, 2:24 look [2] - 4:9, 5:17 looking [2] - 4:18, 5:25 lower [1] - 5:15	meets [1] - 15:10 met [4] - 6:16, 11:15, 13:11, 15:13 minimum [1] - 7:23 missing [2] - 8:13, 9:7 model [1] - 6:16 modular [2] - 10:18, 17:5 months [2] - 9:8, 12:7 MORRIS [1] - 2:2 Morris [1] - 2:23 most [1] - 14:9 motion [10] - 7:2, 13:20, 13:24, 13:25, 14:6, 15:22, 17:10, 18:1, 18:2 Motion [1] - 1:11 move [5] - 3:21, 7:9, 8:2, 8:9, 8:17 MR [25] - 2:17, 2:22, 3:12, 4:4, 4:18, 5:10, 5:21, 6:22, 7:4, 7:9, 9:19, 10:4, 10:15, 11:5, 11:11, 11:25, 12:4, 12:11, 12:18, 12:21, 13:2, 18:10, 18:11, 18:13, 18:16 must [4] - 14:14, 14:23, 15:23, 17:12	noticed [1] - 9:1 notifies [1] - 16:14 number [1] - 5:17	Plaintiff's [3] - 13:24, 17:22, 18:4 plausible [2] - 14:12, 14:25 plausibly [3] - 5:20, 14:15, 15:23 plead [5] - 6:21, 14:2, 14:3, 14:18, 15:23 pleaded [1] - 14:8 pleading [3] - 3:8, 6:11, 15:20 pleadings [3] - 4:13, 5:9, 6:10 pled [2] - 3:15, 3:20 plurality [13] - 6:6, 6:8, 6:15, 6:16, 7:6, 7:7, 7:12, 7:13, 7:19, 8:14, 8:24, 15:14 point [2] - 8:20, 13:10 points [1] - 9:20 possibly [1] - 4:16 pre [1] - 11:20 pre-suit [1] - 11:20 precedent [2] - 4:19, 4:23 preface [1] - 13:2 prepared [1] - 3:1 present [3] - 3:1, 6:1, 14:3 presiding [1] - 2:13 printout [1] - 10:7 proceeding [1] - 18:21 produce [1] - 6:17 product [23] - 8:6, 8:12, 8:18, 8:24, 9:4, 9:6, 9:9, 10:9, 10:15, 11:6, 11:18, 11:19, 12:18, 13:4, 13:6, 13:16, 14:25, 15:5, 15:9, 15:10, 16:12, 17:24 Products [4] - 17:1, 17:4, 17:7, 17:8 products [15] - 9:2, 10:23, 11:2, 11:4, 11:10, 11:14, 12:3, 12:13, 13:5, 13:8, 13:18, 14:15, 15:5, 16:10 provide [1] - 16:16 providing [2] - 15:12, 16:8 psychic [1] - 12:22 purely [2] - 5:23, 5:24 pursuant [1] - 13:21 put [3] - 10:22, 15:3, 15:17	Q
				R
M	N	P		
M8 [5] - 4:19, 5:11, 5:22, 8:1, 14:22 main [1] - 9:20 majority [1] - 12:8 Management [1] - 2:19 MANAGEMENT [1] - 1:4 mapping [1] - 8:15 Maryellen [1] - 2:13 MARYELLEN [1] - 1:15 material [1] - 9:1 matter [2] - 14:10, 14:11 mean [9] - 3:24, 4:4, 4:8, 4:18, 5:2, 5:3, 5:10, 5:21, 9:25 meant [2] - 12:22, 13:14 meet [1] - 17:15	narrower [1] - 12:15 narrowing [1] - 4:23 near [1] - 5:18 necessary [2] - 3:20, 9:13 need [8] - 3:25, 4:13, 4:20, 5:5, 6:15, 6:25, 10:24, 18:8 never [1] - 4:7 next [4] - 7:10, 8:17, 8:20, 15:19 NICHOLS [1] - 2:2 Nichols [1] - 2:23 non [2] - 11:20, 13:16 non-infringement [2] - 11:20, 13:16 none [1] - 7:1 Noreika [1] - 2:13 NOREIKA [1] - 1:15 notes [1] - 18:21 nothing [2] - 9:8, 11:17 notice [15] - 3:22, 4:21, 8:3, 9:13, 10:22, 12:9, 14:20, 15:3, 15:17, 16:3, 16:8, 16:9, 16:16, 16:20, 16:21	p.m [2] - 1:10, 18:20 page [1] - 10:12 papers [1] - 3:4 paragraph [2] - 10:16, 10:17 particular [2] - 6:16, 12:15 particularly [5] - 3:8, 6:1, 8:15, 8:19, 9:3 party [1] - 15:24 party's [1] - 15:25 Patent [7] - 13:22, 15:6, 15:11, 16:3, 16:25, 17:24, 17:25 patent [12] - 10:24, 12:2, 12:5, 14:2, 14:25, 15:20, 15:21, 15:25, 16:5, 16:14, 17:13, 17:14 patent's [1] - 12:8 patent-at-issue [1] - 16:14 patentee [1] - 17:16 period [2] - 11:21, 11:22 personal [1] - 17:2 photos [1] - 15:12 physical [1] - 5:23 place [1] - 14:20 Plaintiff [3] - 1:5, 1:24, 18:6 plaintiff [4] - 2:18, 14:9, 14:18, 17:15		

S	standards ^[1] - 3:7 start ^[1] - 2:15 started ^[1] - 13:13 state ^[6] - 5:19, 5:20, 13:22, 14:11, 14:13, 15:16 statement ^[2] - 11:13, 18:6 states ^[2] - 15:8, 16:9 STATES ^[1] - 1:1 States ^[2] - 1:15, 2:11 stating ^[2] - 16:25, 17:11 stenographic ^[1] - 18:21 still ^[2] - 11:15 Street ^[1] - 1:12 subjectively ^[1] - 17:17 substance ^[1] - 3:17 substantial ^[2] - 5:17 sufficiency ^[1] - 16:7 sufficient ^[7] - 4:2, 14:11, 15:3, 16:13, 16:22, 17:9, 17:23 sufficiently ^[2] - 5:19, 15:16 suggest ^[4] - 5:14, 5:15, 5:18, 13:15 suit ^[1] - 11:20 summarize ^[1] - 3:14 summary ^[1] - 9:20 super ^[1] - 4:8 supports ^[1] - 17:1 supposed ^[1] - 11:4 sur ^[2] - 13:25, 18:5 sur-reply ^[2] - 13:25, 18:5 survive ^[1] - 15:22 switch ^[4] - 7:11, 8:23, 11:18, 13:10 switches ^[2] - 11:11, 11:14 system ^[1] - 10:8	9:23, 10:13, 10:22, 11:7, 11:21, 12:1, 12:10, 12:17, 12:20, 12:24, 13:19, 18:12, 18:14, 18:17 theories ^[1] - 10:1 theory ^[2] - 3:22, 4:21 Thomas ^[2] - 2:20 THOMAS ^[2] - 1:22, 1:23 three ^[1] - 3:19 Thursday ^[1] - 1:10 Tigan ^[2] - 2:21, 2:23 TIGAN ^[2] - 2:3, 2:22 together ^[2] - 17:4, 17:9 took ^[1] - 17:19 toward ^[1] - 5:12 towards ^[1] - 5:17 transcript ^[1] - 18:21 travels ^[1] - 18:17 true ^[3] - 14:8, 14:24, 18:21 try ^[1] - 5:3 trying ^[1] - 6:13 TUNNELL ^[1] - 2:2 two ^[3] - 3:18, 12:5, 12:7	3:1 water ^[1] - 11:13 website ^[1] - 10:8 welcome ^[1] - 3:3 well-pleaded ^[1] - 14:8 whatnot ^[1] - 8:3 white ^[1] - 8:20 whole ^[2] - 4:7, 16:12 willful ^[10] - 3:16, 8:2, 8:4, 9:13, 10:23, 11:23, 13:24, 14:5, 17:11, 17:16 willfulness ^[1] - 18:2 Wilmington ^[1] - 1:13 withstand ^[1] - 17:9 wording ^[1] - 12:15 words ^[1] - 14:23 wrote ^[3] - 8:8, 8:9, 9:6
		U	Y
		U.S ^[1] - 18:24 under ^[3] - 4:22, 12:9, 15:7 underlying ^[1] - 3:20 understood ^[2] - 7:4, 13:3 unfair ^[1] - 6:25 unique ^[1] - 13:3 UNITED ^[1] - 1:1 United ^[2] - 1:15, 2:11 up ^[1] - 7:10 users ^[1] - 17:4	YENERALL ^[1] - 2:3 Yenerall ^[1] - 2:25
	T	V	
	technically ^[1] - 12:7 technology ^[5] - 4:5, 4:8, 4:10, 5:23, 5:24 temperature ^[5] - 6:18, 6:19, 10:19, 13:12, 17:8 ten ^[1] - 9:8 tend ^[1] - 5:16 terribly ^[1] - 3:9 THE ^[28] - 1:1, 1:2, 1:15, 2:14, 2:21, 3:3, 3:24, 4:6, 5:1, 5:13, 6:13, 6:24, 7:8, 9:18,	versus ^[1] - 9:24 videos ^[3] - 15:12, 17:2, 17:3 view ^[1] - 14:9	
safe ^[1] - 18:17 sales ^[1] - 17:2 schedule ^[2] - 18:12, 18:15 seated ^[1] - 2:15 second ^[13] - 6:7, 6:8, 6:15, 6:16, 6:17, 6:18, 7:2, 7:6, 7:7, 7:11, 7:13, 7:19, 15:13 see ^[4] - 5:4, 7:24, 12:17 selector ^[1] - 8:20 selling ^[1] - 12:3 send ^[1] - 18:14 sent ^[1] - 12:4 September ^[1] - 12:5 series ^[2] - 12:13, 13:7 session ^[1] - 2:13 several ^[1] - 15:12 shape ^[2] - 6:7, 6:9 shapes ^[1] - 7:7 Shaw ^[1] - 2:18 SHAW ^[1] - 1:19 shortly ^[2] - 12:4, 12:6 show ^[2] - 10:24, 17:17 showing ^[3] - 14:2, 15:23, 17:16 shown ^[1] - 17:3 significantly ^[1] - 5:15 simple ^[2] - 4:5, 4:8 singular ^[1] - 12:19 skip ^[1] - 3:18 slide ^[8] - 3:13, 6:4, 7:10, 8:10, 8:12, 8:17, 8:20, 9:1 slides ^[2] - 3:18, 7:10 SLIM ^[14] - 8:19, 9:25, 10:2, 10:12, 10:21, 11:12, 13:5, 13:8, 13:9, 13:10, 13:13, 15:9, 16:11, 16:15 smaller ^[2] - 10:10, 10:11 Sony ^[1] - 14:22 sorry ^[3] - 8:9, 8:16, 12:23 sort ^[1] - 4:9 sounded ^[1] - 4:14 space ^[1] - 4:23 specific ^[4] - 11:18, 13:3, 15:5, 15:6 specifically ^[1] - 15:24 stage ^[2] - 6:2, 16:13 standard ^[4] - 4:17, 5:14, 5:15, 14:7		W	WASSERMAN ^[15] - 2:6, 3:12, 4:4, 4:18, 5:10, 5:21, 6:22, 7:4, 7:9, 9:19, 12:11, 12:18, 12:21, 13:2, 18:10 Wasserman ^[2] - 2:24,