

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IMPERATIVE CARE, INC.,

Petitioner

v.

INARI MEDICAL, INC.,

Patent Owner.

Case No. IPR2025-01562

U.S. Patent No. 12,109,384

VIDEOTAPED DEPOSITION OF PAUL ZALESKY, Ph.D.

Friday, August 21, 2026 9:11 a.m.

Boston Marriott Long Wharf

296 State Street, Boston, MA 02109

Reported by:

Janet McHugh, RMR, CRR, CLR

JOB NO. 00192451

<i>Imperative Care v. Inari Medical</i> IPR2025-01562 Imperative Care Exhibit 1062
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1 APPEARANCES: 2 3 KNOBBE MARTENS OLSON & BEAR, LLP 4 (By Joshua J. Stowell, Esquire) 5 2040 Main Street, 14th Floor 6 Irvine, CA 92614 7 949.760.0404 8 joshua.stowell@knobbe.com 9 Counsel for the Petitioner 10 11 ASHURST PERKINS COIE LLP 12 (By Joseph Hamilton, Esquire) 13 1888 Century Park East, Suite 1700 14 Los Angeles, CA 90067-1721 15 Tel: (310) 788-3271 16 Counsel for the Patent Owner 17 18 19 ALSO PRESENT: 20 Geoffrey Bassett, Videographer 21 22	1 P R O C E E D I N G S 2 THE VIDEOGRAPHER: Good morning, 3 everyone. 4 THE WITNESS: Good morning. 5 THE VIDEOGRAPHER: This is file number 6 one of the videotaped deposition of Dr. Paul 7 Zalesky, taken by Joshua J. Stowell on behalf of 8 Imperative Care, Inc. in the matter of Imperative 9 Care, Inc. versus Inari Medical, Inc. in the 10 United States Patent and Trademark Office, before 11 the Patent Trial and Appeal Board, Case Number 12 IPR2025-01562. 13 This deposition is being held at Boston 14 Marriott Long Wharf at 296 State Street in 15 Boston, Massachusetts on Friday, August 21, 2026. 16 The time is now 9:12 a.m. 17 My name is Geoffrey Bassett, and I'm 18 the videographer today with Digital Evidence 19 Group. The court reporter is Janet McHugh, also 20 with Digital Evidence Group. 21 I'll ask at this time for counsel to 22 please introduce themselves for the record.
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1 I N D E X 2 WITNESS DIRECT CROSS REDIRECT RECROSS 3 PAUL ZALESKY, Ph.D. 4 By Mr. Stowell 5 5 6 E X H I B I T S 7 Number Description Page 8 Exhibit 1058 Document from the prosecution 9 history of Application Number 10 18-598,482 100 11 Exhibit 1059 Document titled "Notice of 12 Allowance and Fees Due for 13 Application Number 18-598,482" 101 14 15 PREVIOUSLY MARKED EXHIBITS 16 Number Page 17 Exhibit 1001 20 18 Exhibit INARI-2001 57 19 20 21 22	1 MR. STOWELL: Joshua Stowell of Knobbe 2 Martens on behalf of the petitioner, Imperative 3 Care. 4 MR. HAMILTON: Joseph Hamilton on 5 behalf of patent owner and the witness. 6 THE VIDEOGRAPHER: All right. At this 7 time, we'll hand it over to the court reporter to 8 swear in the witness. 9 PAUL ZALESKY, PH.D., 10 having been duly sworn, after presenting 11 identification in the form of a driver's license, 12 deposes and says as follows: 13 CROSS-EXAMINATION 14 BY MR. STOWELL: 15 Q. Good morning. Can you please state 16 your name for the record. 17 A. Paul Zalesky. 18 Q. And, Dr. Zalesky, what is your home 19 address? 20 A. 124 Gilbert Stuart Drive, East 21 Greenwich, Rhode Island. 22 Q. And you have been retained to serve as

Page 6 1 an expert witness on behalf of the patent owner, 2 Inari Medical, correct? 3 A. Yes. 4 Q. And do you understand that today's 5 deposition involves an IPR that was filed by 6 Imperative Care? 7 A. Yes, I do. 8 Q. And you understand that the IPR we're 9 discussing today relates to U.S. Patent Number 10 12,109,384 or the '384 patent? 11 A. Yes. 12 Q. Okay. And if I refer to the '384 13 patent today, will you know which patent I'm 14 referring to? 15 A. I will. 16 Q. Okay. You understand that you're under 17 oath and required to tell the truth just as if 18 you were testifying in a court of law? 19 A. I do. 20 Q. Do you understand that all your answers 21 need to be verbal so that the court reporter can 22 transcribe them?	Page 8 1 break. 2 Is that fair? 3 A. Okay. 4 Q. Is there any reason you can't provide 5 truthful and accurate testimony today? 6 A. No. 7 Q. Have you had any food or drink or 8 medication that would inhibit your ability to 9 tell the truth? 10 A. No. 11 Q. Have you had any food, drink, or 12 medication that would inhibit your ability to 13 recollect events? 14 A. No. 15 Q. Is your billing rate that you're 16 charging in this matter to Inari Medical still 17 \$350 per hour? 18 A. Yes. 19 Q. Since you started working on the IPRs 20 on behalf of Inari Medical, have you acquired any 21 stock in Inari Medical? 22 A. No.
Page 7 1 A. Yes. 2 Q. We'll try to avoid talking over each 3 other today, so please wait for me to answer -- 4 or ask my question, and I'll wait for you to 5 answer before I ask another question. 6 Is that fair? 7 A. Sure. 8 Q. If you don't understand a question, 9 please let me know. If you don't speak up, the 10 assumption will be that you have understood the 11 question. 12 Do you understand? 13 A. Understood. 14 Q. Your counsel may make short objections 15 today. However, you'll have to answer all of my 16 questions unless you're specifically instructed 17 by your counsel not to answer the question. 18 Do you understand? 19 A. Understood. 20 Q. If you need a break, please let me 21 know. The only thing I'll ask is that we try to 22 finish the question we're on before we take a	Page 9 1 Q. Have you acquired any stock in Stryker 2 Corporation? 3 A. No. 4 Q. Have you acquired any other 5 ownership in Inari or Stryker? 6 A. No. 7 Q. Have you been promised anything based 8 on the outcome of this IPR relating to the '384 9 patent? 10 A. No. 11 Q. Have you been promised anything based 12 on the outcome of any of the other IPRs that 13 Imperative Care has filed against Inari? 14 A. No. 15 Q. What did you do to prepare for your 16 deposition today? 17 A. I reviewed a few documents, probably to 18 the extent of an hour or two. And then a brief 19 Zoom with counsel to review selected document 20 issues. 21 MR. HAMILTON: And I'll just interject 22 with an objection. You can reveal what you did

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1 in prep, but I'm instructing you not to answer 2 with respect to any communication with -- 3 THE WITNESS: Counsel. 4 MR. HAMILTON: -- counsel. That's 5 right. 6 THE WITNESS: Okay. 7 BY MR. STOWELL: 8 Q. So you prepared for an hour or two on 9 your own for this deposition; is that correct? 10 A. Yes. 11 Q. And during that time, what did you do 12 to prepare? 13 A. Primarily reviewing my declaration with 14 respect to '384. 15 Q. And did you also review the '384 16 patent? 17 A. I looked at pieces of it, quite 18 frankly, very briefly. 19 Q. And do you recall what pieces of the 20 '384 patent you focused on? 21 MR. HAMILTON: I'll object. To the 22 extent your answer requires reviewing	1 of review in preparation for this deposition, did 2 you do that review at the direction of your 3 counsel? 4 A. No. 5 Q. Okay. So in terms of the pieces of the 6 '384 patent that you reviewed during your one to 7 two hours of preparation, do you recall what 8 pieces you reviewed? 9 MR. HAMILTON: Again, same objection. 10 To the extent you reviewed documents at the 11 instruction of counsel, I'm instructing you not 12 to answer. 13 A. So, again, just brief selected segments 14 of the '384. 15 Q. Right. So the question is, do you 16 remember what segments those are? 17 MR. HAMILTON: And, again, same 18 objection. If the segments you reviewed or any 19 information was reviewed at the instruction of 20 counsel, I'm instructing you not to answer. 21 A. So would you repeat your specific 22 question? See if I can answer it at all?
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1 communications with counsel, I'm instructing you 2 not to answer. 3 A. I've been instructed not to answer. 4 Q. So I'm talking about the preparation 5 that you did, the one to two hours. During that 6 time, you indicated you reviewed your declaration 7 and pieces of the '384 patent. 8 What pieces of the '384 patent did you 9 review while you were performing your own review? 10 MR. HAMILTON: And, again, I will give 11 the same objection, privileged. To the extent 12 you reviewed material at the instruction of 13 counsel, I'm instructing you not to answer. 14 A. Yeah. So just very selected brief 15 segments of the '384 patent. 16 Q. And do you remember what segments those 17 were? 18 MR. HAMILTON: Again, same objection. 19 Same instruction. 20 A. Yeah. I guess I shouldn't be more 21 specific than that. 22 Q. So when you did your one to two hours	1 Q. Sure. So you've testified that the 2 review you did, the one to two hours, was not 3 done at the direction of counsel. 4 So for that one to two hours, when you 5 reviewed the '384 patent, do you recall what 6 segments of the patent you reviewed? 7 MR. HAMILTON: Objection. 8 Mischaracterizes the testimony. 9 A. Yes, I do recall. 10 Q. Okay. What portions of the '384 patent 11 did you review during that one to two hours that 12 you did your preparation? 13 MR. HAMILTON: Again, same objection. 14 Same instruction. 15 A. Yeah. I can't give you more detail 16 than that, apparently -- 17 Q. So you don't -- 18 A. -- with the advice of counsel. 19 MR. STOWELL: So, Joe, I want to be 20 clear, are you instructing him not to answer the 21 question I just asked? I want it clear on the 22 record that you're instructing him not to answer

Page 14 1 for the portions of the '384 patent that he 2 reviewed during the one to two hours of 3 preparation that he did that wasn't at the 4 direction of counsel. 5 Are you instructing him not to answer 6 that question? 7 MR. HAMILTON: Well, I think maybe the 8 question assumes facts that aren't in evidence. 9 And so, yes, I'm instructing him not to reveal 10 anything that could reveal a communication with 11 counsel, including reviewing portions of a patent 12 where he was instructed to review those portions. 13 MR. STOWELL: Okay. 14 BY MR. STOWELL: 15 Q. And just to clarify, Dr. Zalesky, when 16 you did your one to two hours of review that 17 included looking at parts of the '384 patent, 18 were you instructed to look at the parts of the 19 '384 patent that you looked at by counsel? 20 MR. HAMILTON: Objection. Vague. 21 A. Following my independent personal 22 review, yes, I was instructed by counsel to look	Page 16 1 MR. HAMILTON: Objection. Vague. 2 Mischaracterizes the testimony. Privileged. 3 I'm instructing the witness not to 4 answer to the extent the answer reveals 5 attorney-client communications. 6 A. So the answer is actually simple. I 7 didn't focus on any particular claim. 8 Q. So which claims did you review during 9 your independent study? 10 A. All of them. 11 Q. And when did you do your independent 12 study, the one to two hours of review? 13 MR. HAMILTON: Objection. 14 Mischaracterizes the testimony. Vague. 15 A. Approximately a week-and-a-half ago. 16 Q. And that review one-and-a-half weeks 17 ago, is that the only independent study you did 18 in preparation for the deposition today? 19 A. Other than -- 20 MR. HAMILTON: Objection. Vague. 21 A. Other than a brief few minutes looking 22 at notes, that was primarily it.
Page 15 1 at specific segments. 2 Q. Okay. So let's talk about the part 3 during your independent personal review. 4 During that review, were you instructed by 5 counsel to look at specific portions of the 6 patent? 7 MR. HAMILTON: Objection. Vague. To 8 the extent you can answer without revealing 9 attorney-client communications, you may answer. 10 If you can't, then I'm instructing you 11 not to answer. 12 A. I looked at selected figures and some 13 claims. 14 Q. Okay. And for the figures, what 15 figures did you focus on? 16 MR. HAMILTON: Same objection. Same 17 instructions. 18 A. I actually reviewed all of them, but 19 primarily 6 and 7. 20 Q. And you also, during your independent 21 study, you looked at the claims. 22 What claims were you focused on?	Page 17 1 Q. And then you also, to prepare for the 2 deposition, you had a Zoom with your counsel; is 3 that correct? 4 A. Yes. 5 Q. And when did you have that Zoom with 6 your counsel? 7 A. Today is Thursday. It would be 8 yesterday. 9 Q. So Wednesday, August the 20th [sic]? 10 A. Correct. 11 Q. Wait. No. Yesterday would be 12 Thursday, August 21? 13 A. Sorry. It was Wednesday, the 19th; is 14 that right? 15 Q. 20th. 16 A. The 20th, sorry. 17 Q. So Wednesday, the 20th. And how long 18 did you spend on the Zoom call? 19 A. One and a half hours. 20 Q. And besides you, who was present for 21 the Zoom call? 22 A. It was just myself and counsel.

Page 18 1 Q. And when you say "counsel," you're 2 referring to Mr. Hamilton? 3 A. Yes. 4 Q. Any other counsel on the call? 5 A. No. 6 Q. Have you spoken to anyone at Inari 7 regarding the IPR relating to the '384 patent? 8 A. No. 9 Q. And did you speak to anybody at Inari 10 to prepare for your deposition today? 11 A. No. 12 Q. Had you spoken to anyone at Stryker 13 regarding the IPR related to the '384 patent? 14 A. No. 15 Q. And did you speak to anybody at Stryker 16 to prepare for your deposition today? 17 A. No. 18 Q. Have you spoken with any of the other 19 experts that Inari has retained to assist them in 20 the IPRs filed by Imperative Care? 21 A. No. 22 Q. And during your Zoom meeting with	Page 20 1 review any of the prior art references? 2 MR. HAMILTON: Objection. Vague. 3 Mischaracterizes the testimony. 4 A. I briefly reviewed various selected 5 segments of the relevant prior art patents. 6 Q. When you say "relevant prior art 7 patents," what patents are you including within 8 that? 9 MR. HAMILTON: Same objection. 10 A. Hartley and Eller. 11 Q. And what about the Schaffer reference, 12 was that a reference that you reviewed during 13 your independent study? 14 MR. HAMILTON: Same objection. 15 Privileged. 16 A. No. 17 MR. STOWELL: So, Dr. Zalesky, I'm 18 going to hand you what has been previously marked 19 in this IPR as Exhibit 1001. 20 (Previously marked Exhibit 1001 21 incorporated by reference.) 22 MR. HAMILTON: Thank you.
Page 19 1 counsel, did you review any documents during that 2 meeting that refreshed your recollection 3 regarding any of the facts or issues in this IPR? 4 MR. HAMILTON: Objection. Privileged. 5 I'm instructing the witness not to answer to the 6 extent it reveals any communications with 7 counsel. 8 A. There wasn't emphasis on any particular 9 document. 10 Q. And did any of the documents you 11 reviewed refresh your recollection regarding any 12 of the facts or issues in the IPR? 13 MR. HAMILTON: Same objection. 14 A. Not really. 15 Q. Have you reviewed any of your prior 16 deposition transcripts from the depositions that 17 were taken in the IPRs that Imperative Care has 18 filed? 19 MR. HAMILTON: Objection. Vague. 20 A. No. 21 Q. As part of your preparation for this 22 IPR, during your independent study, did you	Page 21 1 BY MR. STOWELL: 2 Q. Dr. Zalesky, do you recognize 3 Exhibit 1001? 4 A. Yes. It's the '384 patent. 5 Q. And is this the '384 patent that we're 6 here today to discuss from the IPR filed by 7 Imperative Care? 8 A. It appears so, yes. 9 Q. And is this a patent that you have 10 reviewed before? 11 A. Yes. 12 Q. And we were discussing your independent 13 study. Is this the '384 patent that you reviewed 14 portions of during your independent study? 15 MR. HAMILTON: Objection. Vague. 16 Mischaracterizes the testimony. 17 A. Yes. 18 Q. If you could turn to Figures 6 and 7 of 19 the '384 patent, and let me know when you are 20 there. 21 A. I'm there. 22 Q. And in forming your opinions that you

Page 22 1 set forth in your declaration for this IPR, did 2 you review Figures 6 and 7 as well as the 3 portions of the specification relating to 4 Figure 6 and 7? 5 A. During my independent review, I did 6 review the figures. I didn't review the 7 specification. 8 Q. What about when you were putting 9 together your declaration that was filed in this 10 IPR, at that point in time, did you review 11 Figures 6 and 7 and the portions of the 12 specification relating to Figures 6 and 7? 13 A. Yes. 14 Q. Okay. And I understand that, in this 15 IPR, you have opined that Figure 6 discloses a 16 single filament. 17 Is that accurate? 18 MR. HAMILTON: Objection. His 19 declaration speaks for itself. 20 A. Yes. 21 Q. And I understand that you have opined 22 that Figure 7 discloses a "first filament" and a	Page 24 1 BY MR. STOWELL: 2 Q. Dr. Zalesky, do you need me to repeat 3 the question? 4 A. No. I recall. My answer is yes. 5 Q. Now, would you agree with me that the 6 '384 patent never describes any benefits to using 7 a first and second filament, as shown in Figure 7 8 versus a single filament, as shown in Figure 6? 9 MR. HAMILTON: Objection. Vague. 10 A. I would honestly have to re-review the 11 written description part of the specification. 12 But I don't recall specific advantage properties 13 described. 14 Q. Would you agree with me that the '384 15 patent also doesn't describe any drawbacks of 16 using a single filament, as shown in Figure 6, 17 versus a first and second filament, as shown in 18 Figure 7? 19 MR. HAMILTON: Objection. Vague. 20 A. I'm not quite sure how to answer that, 21 in light of the claims, which are very specific 22 to a first and second filament.
Page 23 1 "second filament." 2 Is that correct? 3 MR. HAMILTON: Objection. Are you 4 going to give him his declaration or do you want 5 him to just -- 6 MR. STOWELL: I'm asking him questions. 7 MR. HAMILTON: All right. So to the 8 extent you can remember everything off the top of 9 your head that's in your declaration, feel free 10 to answer. 11 MR. STOWELL: Joe, that's an 12 inappropriate speaking -- not even objection. 13 Just admonition. So please stop that. 14 If you want to make an objection, you 15 can do so. It needs to be short under the board 16 rules, as I know you know. 17 MR. HAMILTON: I believe it's unfair of 18 you for you to ask him about a declaration that I 19 know is many, many pages that was submitted many 20 months ago. And if you're going to ask him 21 questions about his declaration, you should give 22 him his declaration.	Page 25 1 Q. And do you believe that there's any 2 disclosure in the '384 patent specification that 3 describes drawbacks of using a single filament, 4 as shown in Figure 6, versus a first and second 5 filament, as shown in Figure 7? 6 MR. HAMILTON: Objection. Vague. 7 Incomplete hypothetical. 8 A. I don't recall a specific citation to 9 that point. Yeah. 10 Q. Based on your review of the '384 11 patent, does the '384 patent ever explain why a 12 person of ordinary skill in the art would use a 13 first and second filament, as shown in Figure 7, 14 instead of a single filament, as shown in 15 Figure 6? 16 MR. HAMILTON: Objection. Vague. 17 A. Again, I'd have to re-review the 18 written description, but I don't recall a 19 specific comparison of single versus first and 20 second. 21 Q. Based on your extensive experience in 22 the field, why would a person of ordinary skill

Page 26 1 in the art, in September 2017, have selected a 2 first and second filament, as shown in Figure 7, 3 instead of a single filament, as shown in 4 Figure 6? 5 MR. HAMILTON: Objection. Vague. 6 Incomplete hypothetical. 7 A. Figure 7 is basically a nice summary of 8 the invention, from my point of view. And a key 9 aspect of Figure 7 is the different rotational 10 directions of the two separate filaments. 11 Q. Why do you consider the different 12 rotational directions a key aspect of Figure 7? 13 MR. HAMILTON: Objection. Vague. 14 Incomplete hypothetical. 15 A. The lower filament cinches, if you 16 will, from the bottom of the enclosed sleeve or 17 tube. The upper filament does that same thing 18 from the upper aspect of that same sleeve or 19 tube. 20 Q. And would a person of ordinary skill in 21 the art, in September 2017, have found that 22 different rotational directions were a benefit of	Page 28 1 Incomplete. 2 A. I want to repeat my previous answer. 3 It's possible, but I can't definitively say yes. 4 Q. So is it fair to say that you haven't 5 formed any opinions regarding whether a person of 6 ordinary skill in the art, in September 2017, 7 would have recognized any benefits to using a 8 first and second filament, as shown in Figure 7, 9 versus a single filament, as shown in Figure 6? 10 MR. HAMILTON: Objection. Vague. 11 Incomplete. Mischaracterizes the testimony. 12 A. Yeah. Pretty much the same answer that 13 I gave earlier. That a POSITA, I think, would 14 focus more on the content of the specification, 15 as opposed to a potential future product 16 advantage. 17 Q. So a person of ordinary skill in the 18 art, in September 2017, after reading the '384 19 patent, would not have recognized any benefits to 20 using a first and second filament, as shown in 21 Figure 6, versus a single filament, as shown in 22 Figure -- sorry. Let me back up. I'll start
Page 27 1 a first and second filament? 2 MR. HAMILTON: Objection. Vague. 3 Incomplete hypothetical. 4 A. I think the invention stands on its own 5 merit as a unique idea. So I really don't know 6 how to answer an obvious advantage perspective 7 from a POSITA. 8 Q. When you say "an obvious advantage 9 perspective," what do you mean? 10 A. I'm trying to answer your question. 11 Would a POSITA immediately see an advantage to 12 that configuration? And I don't know how to 13 answer that. 14 I don't know the POSITA would actually 15 consider that. That's more of a product question 16 than a patent or invention question. 17 Q. Would a person of ordinary skill in the 18 art, in September 2017, have recognized any 19 benefits of using a first and second filament, as 20 shown in Figure 7, versus a single filament, as 21 shown in Figure 6? 22 MR. HAMILTON: Objection. Vague.	Page 29 1 over. 2 So a person of ordinary skill in the art, in 3 September 2017, after reading the '384 patent, 4 would not have recognized any benefits to using a 5 first and second filament, as shown in Figure 7, 6 versus a single filament, as shown in Figure 6? 7 MR. HAMILTON: Objection. Vague. 8 Mischaracterizes the testimony. Incomplete. 9 Asked and answered. 10 A. Yeah. Again, I go back to my previous 11 answer, that that would be a theoretical answer. 12 That, yes, there was an advantage perceived. I 13 can't know that. 14 Q. As part of your review of the '384 15 patent, when you were reviewing the validity, did 16 you put yourself into the position of the person 17 of ordinary skill in the art when you did your 18 analysis? 19 MR. HAMILTON: Objection. Vague. 20 A. Yes. 21 Q. And putting yourself into the position 22 of the person of ordinary skill in the art, in

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1 September 2017, would that person have recognized 2 any benefits to using a first and second 3 filament, as shown in Figure 7, versus a single 4 filament, as shown in Figure 6? 5 MR. HAMILTON: Objection. Vague. 6 Incomplete. Asked and answered. 7 A. Yeah. The same answer as before, with 8 the small addendum that as a POSITA myself, in 9 reviewing it, I focused on the content, not the 10 potential product benefit. 11 Q. And by you "focused on the content," 12 you mean you focused on the disclosure in the 13 '384 patent? 14 A. Yes. 15 Q. Okay. And the disclosure in the '384 16 patent does not identify any benefits to using a 17 first and second filament, as shown in Figure 7, 18 versus a single filament, as shown in Figure 6, 19 right? 20 MR. HAMILTON: Objection. Incomplete. 21 Vague. Asked and answered. 22 A. Yeah. My take is the '011 and the '384	1 Figure 7, versus using a single filament, as 2 shown in Figure 6? 3 MR. HAMILTON: Objection. Incomplete. 4 Vague. Asked and answered. 5 A. It just simply wasn't part of my focus. 6 Q. And as we sit here today, can you 7 identify any benefits to using a first and second 8 filament, as shown in Figure 7, versus using a 9 single filament, as shown in Figure 6? 10 MR. HAMILTON: Objection. Vague. 11 Incomplete. Asked and answered. 12 A. Yeah. As I mentioned earlier, the 13 bottom versus top transition of filaments, if you 14 will, is a potential advantage in terms of 15 cinching completion. 16 Q. And how would that be a potential 17 advantage? 18 MR. HAMILTON: Objection. Vague. 19 Incomplete hypothetical. 20 A. The tensile force pulling either end of 21 either filament is concentrated at 180-degree 22 opposing portions of the enclosed sleeve or tube.
Page 31	Page 33
1 stand separately on their own merits. They're 2 separate inventions, period. 3 Q. So you introduced the '011 there. 4 Why did you raise the '011 patent? 5 A. It's specific to the single filament. 6 Q. And so when you did your review of the 7 '384 patent and you put yourself in the position 8 of a person of ordinary skill in the art, you did 9 not consider any benefits to using a first and 10 second filament, as shown in Figure 7, versus a 11 single filament, as shown in Figure 6, correct? 12 MR. HAMILTON: Objection. Vague. 13 Incomplete. Asked and answered. 14 A. Yeah. I'm repeating myself. But, 15 again, I wasn't thinking of product promo 16 material. 17 I was thinking of the content of the 18 specification. 19 Q. And upon reading the content of the 20 specification, as a person of ordinary skill in 21 the art, did you recognize any benefits to using 22 a first and second filament, as shown in	1 Q. And why would that be advantageous? 2 MR. HAMILTON: Objection. Vague. 3 Incomplete. 4 A. I think I would use the term 5 "potentially advantageous" depending on the 6 content of the sleeve or the tube. 7 Q. And why would that be potentially 8 advantageous? 9 MR. HAMILTON: Objection. Vague. 10 Incomplete. 11 A. The closure dynamics would be quite 12 different for a fluid versus an odd-shaped 13 device. 14 Q. And how would the closure dynamics 15 differ for a fluid versus an odd-shaped device? 16 MR. HAMILTON: Objection. Vague. 17 Incomplete. 18 A. The contact geometry is quite different 19 for a fluid enclosed in a tubule versus, for 20 instance, a rectangular or hexagonal therapeutic 21 device. And so the filament contact geometry 22 would be different for those two different

Page 34 1 configurations. 2 Q. For the different rotational 3 configuration shown in Figure 6, would this 4 configuration have been potentially advantageous 5 for sealing against fluids flowing through the 6 tube? 7 MR. HAMILTON: Objection. Vague. 8 Incomplete. 9 A. I can't -- I can only speculate on the 10 closure efficacy of a single versus double 11 filament. 12 In either case, it's a strangulation or 13 circumferential constriction dynamic. 14 Q. And as we sit here today, as a person 15 of ordinary skill in the art, are you able to 16 identify whether the efficacy of a double 17 filament would be better than a single filament 18 for sealing the tube against fluid flow? 19 MR. HAMILTON: Objection. Vague. 20 Incomplete hypothetical. 21 A. I could only do that with confidence 22 via some actual testing.	Page 36 1 A. To repeat myself -- 2 MR. HAMILTON: Hold on one second. 3 Objection. Vague. Incomplete hypothetical. 4 A. To repeat myself, theoretically, the 5 contact geometry could be advantageous because of 6 the different rotational contacts. 7 Q. And what do you mean by "different 8 rotational contacts"? 9 A. In Figure 7, the lower filament has a 10 tensile force applied maximally, if you will, at 11 the bottom versus the upper filament at the top. 12 So depending on the contained geometry, that 13 different contact geometry could be theoretically 14 advantageous. 15 Q. And could that geometry allow the 16 filaments to seal better against a device 17 inserted through the tubular member? 18 MR. HAMILTON: Objection. Incomplete 19 hypothetical. 20 A. Yes, but only theoretically. 21 Q. And when you're using the word 22 "theoretically," what do you mean by that?
Page 35 1 Q. So you would have to test the actual 2 devices in order to answer that question; is that 3 correct? 4 MR. HAMILTON: Objection. Vague. 5 Incomplete. Mischaracterizes the testimony. 6 A. Not exactly. I would have to test it 7 to determine if there was, in fact, a difference. 8 Q. So earlier you mentioned that the 9 different rotational directions of the filaments 10 in Figure 7 could be potentially advantageous. 11 Would that different rotational direction 12 have been potentially advantageous to seal 13 against fluid or against a device inserted 14 through the tube? 15 MR. HAMILTON: Objection. Incomplete 16 hypothetical. 17 A. I can't answer that without actually 18 testing it. 19 Q. And so when you testified that the 20 different rotational directions could be 21 potentially advantageous, what was the advantage 22 that you were thinking of?	Page 37 1 A. I can artificially envision enclosed 2 geometries and imagine, hypothetically, the 3 enclosure dynamic as the filaments are pulled. 4 Hence, the word "theoretically." 5 Q. And when you're envisioning those 6 situations, are you doing so based on your years 7 of experience in this field? 8 A. I suppose so but it's, frankly, basic 9 physics and mechanics. 10 Q. And you mentioned "closed geometries." 11 What do you mean by "closed geometries"? 12 A. When the sleeve is compressed against 13 the enclosure, whether it's a fluid in one 14 extreme or a complex geometry device, on the 15 other extreme, the closure dynamic and the 16 enclosure geometries are different. 17 Q. When you say "the enclosure geometries 18 are different," what do you mean? 19 A. Fluid is going to be essentially 20 homogeneously driven away from the closure point, 21 the stricture point. 22 A hexagonal therapeutic device, on the other

Page 38 1 hand, is going to stay intact inside the 2 compressed sleeve. 3 Q. And so for the hexagonal therapeutic 4 device, would the different rotational directions 5 of the filaments in Figure 7 have been 6 potentially advantageous? 7 MR. HAMILTON: Objection. Vague. 8 A. Theoretically, potentially advantage. 9 Q. Other than the different rotational 10 directions of the filaments in Figure 7, as a 11 person of ordinary skill in the art, did you 12 consider any other benefits of having a first and 13 second filament versus the single filament shown 14 in Figure 6? 15 MR. HAMILTON: Objection. Incomplete 16 hypothetical. 17 A. Again, I didn't review this in light of 18 a potential future product. I reviewed it in 19 light of the mechanics, engineering, principles, 20 and the specification. 21 Q. And so when you reviewed the patent in 22 view of the mechanics, engineering, and	Page 40 1 the filament shown in Figure 7, correct? 2 A. In other words, a sleeve. Yes. 3 Q. And the sleeve isn't shown in Figure 7, 4 correct? 5 A. It's not shown, correct. 6 Q. But you understand that, in use, a 7 sleeve would pass through the loops shown in 8 Figure 7, correct? 9 A. Yes. 10 Q. If during operation of a valve using 11 the first and second filament shown in Figure 7, 12 one of the filaments failed to close or constrict 13 completely around a device inserted into the 14 valve, would there be any benefit to having the 15 second filament? 16 MR. HAMILTON: Objection. Vague. 17 Incomplete hypothetical. 18 A. As I referenced before, theoretically, 19 that's possible. 20 Q. And why do you say that's theoretically 21 possible? 22 MR. HAMILTON: Same objections. Vague.
Page 39 1 principles in the specification, did you identify 2 any benefits that would exist for the first and 3 second filament shown in Figure 7, versus the 4 single filament shown in Figure 6? 5 MR. HAMILTON: Objection. Incomplete 6 hypothetical. Asked and answered. 7 A. That just wasn't my focus. 8 Q. When you formed your opinions in this 9 case, did you develop any opinions regarding 10 whether there would be any drawbacks to using a 11 single filament, as shown in Figure 6, versus 12 first and second filaments, as shown in Figure 7? 13 MR. HAMILTON: Objection. Vague. 14 Incomplete hypothetical. Asked and answered. 15 A. No. 16 Q. With respect to the first and second 17 filament shown in Figure 7, you understand that 18 those filaments are part of a hemostasis valve, 19 correct? 20 A. Yes. 21 Q. And in that hemostasis valve, there is 22 a tubular member that passes through the loops of	Page 41 1 Incomplete hypothetical. 2 A. Without actual testing, you can't know 3 how the filaments will behave around different 4 geometries. 5 Q. And so you testified that it was 6 theoretically possible. 7 Why do you believe it could be theoretically 8 possible that there would be a benefit to having 9 the second filament? 10 MR. HAMILTON: Objection. Vague. 11 Incomplete hypothetical. 12 A. It's like a spare tire, I suppose. 13 It's a backup. 14 Q. And so can it be advantageous to have a 15 backup? 16 MR. HAMILTON: Objection. Incomplete 17 hypothetical. 18 A. Again, theoretically, there may be 19 instances where it would be good to have that 20 spare tire. 21 Q. And with reference to Figure 7, there 22 may be situations where it's advantageous to have

Page 42 1 a second filament, correct? 2 MR. HAMILTON: Same objection. 3 A. Theoretically, yes. 4 Q. As a person of ordinary skill in the 5 art, and putting yourself in September 2017, can 6 you envision any situations where a first 7 filament may not constrict completely around a 8 device where a second filament would? 9 MR. HAMILTON: Objection. Vague. 10 Incomplete hypothetical. 11 A. No. 12 Q. Is that a scenario that you considered 13 in forming your opinions that you set forth for 14 the '384 patent? 15 MR. HAMILTON: Same objections. Vague. 16 Incomplete hypothetical. 17 A. I don't really understand the question. 18 Are you asking me to compare, in 2017? 19 Q. So as a person of ordinary skill in the 20 art, in September 2017, which is our relevant 21 time frame, are you able to envision any 22 situations where the first filament in Figure 7	Page 44 1 filaments are necessarily robust. So that's a 2 very unlikely scenario. 3 So theoretically, yes, but very unlikely. 4 Q. Would you agree with me that with the 5 single filament in Figure 6, that if that 6 filament didn't seal completely around the 7 device, that there would be no backup in that 8 embodiment, correct? 9 A. Yes. 10 MR. HAMILTON: To that last question, 11 vague. Incomplete hypothetical. 12 BY MR. STOWELL: 13 Q. Focusing on Figure 6, and putting 14 yourself in the position of a person of ordinary 15 skill in the art, in September 2017, are there 16 any situations you can think of where the 17 filament shown in Figure 6 wouldn't completely 18 seal around a device inserted into the valve? 19 MR. HAMILTON: Objection. Vague. 20 Incomplete hypothetical. Calls for speculation. 21 A. I could theoretically envision a 22 complex geometry therapeutic device having
Page 43 1 may not seal completely around the inserted 2 device, but the second filament in Figure 7 3 would? 4 MR. HAMILTON: Objection. Vague. 5 Incomplete hypothetical. 6 A. No. 7 Q. And is that scenario, where a first 8 filament doesn't seal completely in Figure 7, but 9 the second filament does, is that a scenario that 10 you considered in forming your opinions that you 11 set forth in the declaration related to the '384 12 patent? 13 MR. HAMILTON: Same objections. Vague. 14 Incomplete hypothetical. 15 A. No. 16 Q. Focusing on the embodiment in Figure 7, 17 if the first filament broke during operation, 18 would there be an advantage to having the second 19 filament? 20 MR. HAMILTON: Objection. Vague. 21 Incomplete hypothetical. 22 A. Again, this is theoretical. These	Page 45 1 geometry that includes a notch or an insert or 2 inset that filament would not -- or the 3 compressed sleeve, via the filament, would not 4 contact the entire surface of that complex 5 geometry. 6 Q. And in September 2017 were you aware of 7 therapeutic devices having those types of complex 8 geometries? 9 MR. HAMILTON: Objection. Vague. 10 A. Yes. In particular, when two or more 11 devices are inserted at the same time in 12 parallel. 13 Q. And in September 2017, were you aware 14 of procedures where practitioners would insert 15 two or more devices through a hemostasis valve in 16 parallel? 17 MR. HAMILTON: Objection. Vague. 18 A. Yes. 19 Q. And what is one of the procedures that 20 comes to mind? 21 A. One example would be two separate 22 catheters; one infusing, the other aspirating.

Page 46 1 Q. So putting yourself in the chair of a 2 person of ordinary skill in the art, in 3 September 2017, other than complex geometries, 4 are there any other situations you can think of 5 where the filament in Figure 6 may not seal 6 completely around a device inserted through the 7 valve? 8 MR. HAMILTON: Objection. Incomplete 9 hypothetical. 10 A. Not obviously. 11 MR. STOWELL: Okay. We've been going 12 about an hour. Why don't we take our first 13 break. 14 THE VIDEOGRAPHER: The time is now 15 10:04, and we are off the record. 16 (A recess was taken.) 17 THE VIDEOGRAPHER: The time is now 18 10:14, and we are on the record. 19 BY MR. STOWELL: 20 Q. Welcome back, Dr. Zalesky. Did you 21 talk to anybody about your deposition during the 22 break?	Page 48 1 that could be used in a hemostasis valve -- let 2 me start over. 3 Putting yourself in the position of a person 4 of ordinary skill in the art in September 2017, 5 would that person have envisioned or understood 6 any other configurations for filaments that could 7 be used in a hemostasis valve to constrict a 8 tube? 9 MR. HAMILTON: Objection. Vague. 10 A. I think, as a POSITA, you could imagine 11 100 variations on a theme in terms of curlicue or 12 rewrap or various geometries. 13 Q. You mentioned a "curlicue." What do 14 you mean by a "curlicue"? 15 A. Effectively, a spiral geometry. 16 Q. And so is it your position that, in 17 September 2017, a POSITA would have envisioned 18 using a spiral geometry with one filament to 19 constrict a tube within a hemostasis valve? 20 MR. HAMILTON: Objection. Vague. 21 A. This is all theoretical speculation. 22 It could be anywhere from a single filament
Page 47 1 A. No. 2 Q. Did you review any documents during the 3 break? 4 A. No. 5 Q. So if we go back to Figure 6 of the 6 '384 patent, which is Exhibit 1001, and look at 7 Figure 6, can you let me know when you're there? 8 A. I am there. 9 Q. Okay. So Figure 6 depicts a 10 configuration of a single filament, correct? 11 A. Yes. 12 Q. And Figure 7 depicts an embodiment or a 13 configuration having a first filament and a 14 second filament, correct? 15 A. Yes. 16 Q. If we turn to the next page, Figure 8 17 also depicts a configuration having a first 18 filament and a second filament, correct? 19 A. Yes. 20 Q. Now, a person of ordinary skill in the 21 art, in September 2017, would that person have 22 envisioned or understood any other configurations	Page 49 1 to 100 filaments, in terms of alternatives here, 2 to your previous question. 3 Q. So why do you think a person of 4 ordinary skill in the art, in September 2017, 5 would have envisioned one filament up to 100 6 filaments for use in a hemostasis valve to 7 constrict a lumen? 8 MR. HAMILTON: Objection. Vague. 9 Incomplete. 10 A. It's pure speculation. Just 11 imagination options. 12 Q. And so would using more filaments have 13 been obvious to a person of skill in the art, in 14 September 2017, for use in a hemostasis valve to 15 constrict a lumen? 16 MR. HAMILTON: Objection. Vague. 17 Excuse me. Calls for a legal conclusion. 18 A. No. 19 Q. And so when you said a person of 20 ordinary skill in the art, in September 2017, 21 would have envisioned using up to 100 filaments, 22 what did you mean?

Page 50 1 A. I was addressing your question that 2 talked about alternative, potential alternative 3 configurations. And so my speculative 4 theoretical answer was, you know, there could be 5 hundreds of variations on a theme, with no 6 particular motivation, just imaginary geometries. 7 Q. And so putting yourself in the seat of 8 a person of ordinary skill in the art, in 9 September 2017, can you think of any filament 10 configurations other than the configurations 11 shown in Figure 6, 7, and 8 that a person of 12 ordinary skill in the art would have been 13 motivated to use in a hemostasis valve to 14 constrict a tube? 15 MR. HAMILTON: Objection. Vague. 16 Incomplete. 17 A. Again, as a POSITA, focused on the 18 specification and the invention, not the 19 potential application of that invention, so no. 20 Q. And so when you provided your opinions 21 regarding the validity of the '384 patent, you 22 did not develop any opinions on whether there	Page 52 1 or filaments around a tube or a sleeve. 2 Q. And what resultant geometries did you 3 consider when you were forming your opinions for 4 the '384 patent? 5 A. In all cases, it's a garrote or 6 strangulation effect of closure. With more than 7 one filament, I considered the potential effect 8 of the spacing between filaments. 9 Q. What do you mean by "the spacing 10 between filaments"? 11 A. When concentrically wrapped around the 12 tube or the sleeve, were they immediately 13 adjacent, as in contact, or were they separated 14 by some space? 15 Q. And when you considered that spacing, 16 did you only consider it with respect to a first 17 and second filament, or did you consider it with 18 respect to more filaments? 19 MR. HAMILTON: Objection. Vague. 20 Beyond the scope of his declaration. 21 A. Yeah. In my declaration, I restricted 22 it to these configurations.
Page 51 1 would be other filament configurations, besides 2 those shown in Figures 6 through 8, that would 3 work in September 2017 to constrict a tube within 4 a valve? 5 MR. HAMILTON: Objection. Vague. 6 A. I focused on the actual figures and the 7 specification, without speculating on 8 alternatives. 9 Q. And so in forming your opinions 10 regarding the validity of the '384 patent, you 11 did not consider whether there would be any other 12 configurations that could be used for the 13 filament to constrict the tube in a hemostasis 14 valve, other than what is shown in 15 Figures 6 through 8; is that correct? 16 MR. HAMILTON: Objection. Vague. 17 Mischaracterizes the testimony. 18 A. Only in a very general way. Not with 19 any detail. 20 Q. And what do you mean by "a very general 21 way"? 22 A. The resulting geometry of the filament	Page 53 1 Q. When you say "these configurations," 2 are you referring to Figures 6 through 8 in the 3 '384 patent? 4 A. Yes. 5 Q. So you mentioned you thought about 6 configurations for strangulation. And in the 7 '384 patent, in Figures 6 and 7, would you agree 8 that the patent describes using a filament formed 9 in the shape of a loop to perform the 10 strangulation of the tube? 11 A. I think the "loop" is a keyword in the 12 specification and the claims. Yes. 13 Q. In Figure 8 of the '384 patent, would 14 you agree that the constriction of the tubular 15 member occurs through the interaction of two 16 U-shaped members? 17 A. As depicted here, they are U-shaped 18 filaments. 19 Q. And would you agree that the 20 constriction of the tubular member in Figure 8 21 would be accomplished through the interaction of 22 the two U-shaped members?

Page 54 1 A. Yes. 2 Q. In September 2017, would a person of 3 ordinary skill in the art have recognized any 4 other ways to use a filament to constrict a tube 5 in a hemostasis valve other than a loop, as shown 6 in Figures 6 and 7, or U-shaped members, as shown 7 in Figure 8? 8 MR. HAMILTON: Objection. Vague. 9 A. I honestly have not explored that idea. 10 It's theoretically possible, but I did not 11 explore that. 12 Q. And as a person of ordinary skill in 13 the art, sitting here today, can you think of any 14 configurations, other than the loop shown in 15 Figures 6 and 7, or the U-shaped members shown in 16 Figure 8 that could be used to constrict a tube, 17 a hemostasis valve using filaments? 18 MR. HAMILTON: Objection. Vague. 19 A. Again, theoretically, there could be a 20 configuration where the filaments had a 21 preclosure geometry different than shown, for 22 instance, in Figure 8.	Page 56 1 forming a loop with a filament or drawing two 2 filaments towards each other to constrict the 3 lumen, are there any other configurations for the 4 filaments that a person of ordinary skill in the 5 art would have been aware of? 6 MR. HAMILTON: Objection. Vague. 7 Incomplete. 8 A. Nothing comes to mind. 9 Q. Let's turn to Claim 1 in the '384 10 patent. And let me know when you're there. 11 A. I'm there. 12 Q. Okay. Claim 1 requires a first 13 filament and a second filament, correct? 14 A. Yes. 15 Q. And I understand that, in this IPR, you 16 have opined that Claim 1 requires a separate 17 first filament and second filament, correct? 18 MR. HAMILTON: Objection. 19 Mischaracterizes the testimony. His declaration 20 speaks for itself. 21 A. I'd like to look at my precise wording, 22 but that is my recollection.
Page 55 1 Q. What do you mean by "a preclosure 2 geometry different than shown in Figure 8"? 3 A. Again, only theorizing, there could be 4 a secondary structure that creates a preclosure 5 geometry of the filaments. 6 Q. And what would that secondary structure 7 be? 8 A. It could be as simple as a flexible 9 mesh or it could be flexible pins. Again, very 10 theoretical. 11 Q. And so in those theoretical 12 configurations, would you still have the two 13 U-shaped filaments, as shown in Figure 8? 14 MR. HAMILTON: Objection. Vague. 15 A. In my hypotheticals, they wouldn't 16 necessarily be U-shaped. 17 Q. Would you still have two opposing 18 filaments that would be drawn towards each other 19 to constrict the lumen? 20 MR. HAMILTON: Objection. Vague. 21 A. In my hypotheticals, yes. 22 Q. So in September 2017, other than	Page 57 1 Q. You would like to look at your 2 declaration? 3 A. To answer your question completely 4 accurately, I'd just like to see what language I 5 used to confirm your question. 6 MR. STOWELL: So I'll hand you what's 7 been previously marked in this IPR as INARI-2001. 8 And that is the exhibit number. 9 (Previously marked Exhibit 10 INARI-2001 incorporated by reference.) 11 BY MR. STOWELL: 12 Q. Okay. So you have your declaration 13 now. So my question was, I understand that 14 you've opined in this IPR that Claim 1 requires 15 separate first and second filaments; is that 16 correct? 17 MR. HAMILTON: Before you answer, just 18 give me a minute. Okay. No objection. You're 19 free to answer, if you remember the question. 20 A. I'm trying to find my specific 21 citation. I'm looking at pages 12 to 19. I'm 22 not seeing it. I'm not seeing that specific

Page 58 1 citation. 2 Q. Okay. Do you have an opinion as to 3 whether Claim 1 requires separate first and 4 second filaments? 5 A. Consistent with the specification, the 6 plain and simple language is consistent with a 7 separate first and a separate second filament. 8 Q. So it's your opinion in this IPR that 9 Claim 1 requires separate first and second 10 filaments; is that correct? 11 A. Yes. 12 Q. And you'll agree with me that the word 13 "separate" does not appear in Claim 1, correct? 14 A. I don't see the word "separate," but 15 the body of the specification certainly specifies 16 that. 17 Q. So focusing on the language of Claim 1, 18 do you believe there are any terms in the claim, 19 itself, that require separate first and second 20 filaments? 21 A. Maybe I didn't understand your 22 question. Claim 1 is very specific about a first	Page 60 1 consistent with necessarily being separate. 2 Q. And so can you point me to the 3 language, specifically, that you're relying on? 4 A. "The first filament includes a first 5 portion..." et cetera. The next paragraph, "The 6 second filament includes a first portion..." et 7 cetera. 8 So they are clearly separately 9 distinguished. 10 Q. So you're looking in column 22. The 11 first cite you pointed out begins at line 19, and 12 it begins, "The first filament includes a first 13 portion..."? 14 A. Yes. 15 Q. Is that correct? 16 A. Yes. 17 Q. And the second portion you pointed out 18 is in column 22 and begins at line 23 and begins, 19 "The second filament includes a first 20 portion..." correct? 21 A. Yes. 22 Q. So other than the terms "first" and
Page 59 1 and a second filament. 2 Q. And so I'm focused on the term 3 "separate." Are there any terms in Claim 1 that 4 you're relying upon for your opinion that Claim 1 5 requires separate first and second filaments? 6 A. Simply the plain and ordinary meaning 7 of a "first" and then separately a "second," is 8 consistent with clearly separate. 9 Q. So is it your opinion that the plain 10 and ordinary meaning of the terms "first" and 11 "second" require separate? 12 MR. HAMILTON: Objection. Vague. 13 Incomplete. 14 A. Yes. 15 Q. And other than the terms "first" and 16 "second" in Claim 1, are there any other terms in 17 Claim 1 that you're relying upon for your opinion 18 that Claim 1 requires separate first and second 19 filaments? 20 A. The subsequent paragraphs describing 21 actuator attachments for a first filament and, 22 individually, a second filament is also	Page 61 1 "second" in those two portions of Claim 1, are 2 there any other terms in Claim 1 that you are 3 relying upon for your opinion that the first and 4 second filaments must be separate? 5 A. The subsequent paragraphs beginning 6 line 27 and 32, talk about, separately, the first 7 filament and the second filament. 8 Q. So you said "separately." The word 9 "separately" is not in those portions of Claim 1, 10 correct? 11 A. The word "separately" does not appear. 12 Q. So in the portions of the -- of Claim 1 13 in column 22 that begin at line 19 and continue 14 to the end, you're basing your opinion that the 15 claims require separate first and second 16 filaments on the fact that the claim discusses 17 the first filament in different paragraphs than 18 the second filament. 19 Is that fair? 20 A. That language, in addition to the very 21 beginning of Claim 1 that says "a first filament" 22 and then two sentences later "a second filament,"

Page 62	Page 64
1 yes. 2 Q. In Claim 1, other than the specific 3 term "first" and "second," are there any other 4 specific terms that you believe require a 5 separate first and second filament? 6 A. As I said earlier, the subsequent 7 paragraphs, line 22 on, talk about the actual 8 actuator-filament interaction which, again, is 9 consistent with separate filaments. 10 Q. And in those sections, are there any 11 specific terms that you're relying upon that you 12 believe have the meaning "separate"? 13 A. I'm relying on the clear distinction of 14 a first filament and, independently, a second 15 filament. 16 Q. Let's take a string that is made up of 17 two twisted threads. Can you picture that? 18 A. Mm-hmm. Yes. 19 Q. Under your interpretation of Claim 1, 20 would a first thread in that string include a 21 first portion operatively acted upon by a first 22 one of the actuators and a second portion	1 Is that correct? 2 MR. HAMILTON: Objection. 3 Mischaracterizes the testimony. 4 A. It operates on the construction of the 5 threads, not individual threads, per se. 6 Q. And you said "per se." 7 Why did you add the "per se"? 8 A. The threads are integral to the 9 filament, but they're not separately operated on. 10 Q. Do the actuators apply a force to the 11 threads within a string? 12 A. Ultimately, as integral components of 13 the filament, yes. But, in toto, not separately. 14 Q. And so with respect to Claim 1 of the 15 '384 patent, we've talked about the terms "first" 16 and "second." 17 Are there any specific terms that you're 18 relying upon for your opinion that the claim 19 requires separate first and second filaments? 20 A. I think I answered that previously with 21 reference to the different paragraphs, including 22 actuators acting on a first filament and then,
Page 63	Page 65
1 operably acted upon by a second one of the 2 actuators? 3 A. Context is really important here. The 4 string is the filament in that suggested 5 configuration. The individual threads are not 6 the filament. 7 Q. So my question was about the threads 8 within the string. 9 Do you have an opinion regarding whether the 10 thread, the first thread within the string would 11 have a first portion operably acted upon by a 12 first one of the actuators and a second portion 13 operably acted upon by a second one of the 14 actuators? 15 MR. HAMILTON: Objection. Vague. 16 A. No. The actuator acts on the string, 17 not individual threads. 18 Q. So for the opinions you've rendered 19 with respect to the validity of the '384 patent, 20 you have operated within the understanding that 21 the actuator does not act upon the threads within 22 a string.	1 separately, a second filament. And, in addition, 2 there's language of a first loop and, separately, 3 a second loop. 4 Again, consistent with clearly separate 5 filaments. 6 Q. So earlier we were talking about a 7 string that has two wound threads. If the string 8 were formed into a loop, would each of the 9 threads also form a loop? 10 A. Again, the threads are integral to the 11 string. And so they take the same geometry as 12 the combination. 13 In other words, all the threads assume the 14 geometry of the integration of the threads. 15 Q. So if the string forms a loop, the 16 threads form a loop. 17 Is that fair? 18 A. Okay. 19 Q. Do you agree? 20 A. I think so. It's interesting language. 21 I'm smiling at trying to differentiate separate 22 threads and their contribution, if you will.

Page 66 1 Q. Well, we're just talking about 2 geometries, not contribution. 3 Would you agree that if the string is formed 4 into the geometry of a loop, the threads within 5 the string would also be formed into the geometry 6 of a loop? 7 A. Given that they're confined to the 8 string, yes. 9 Q. So you had mentioned that you thought 10 that there was a portion of the specification 11 that you had relied on for your opinion that 12 Claim 1 requires separate first and second 13 filaments. 14 Can you identify that part of the 15 specification that you have relied upon? 16 MR. HAMILTON: Objection. Vague. 17 A. Figure 7 specifically depicts -- 18 MR. HAMILTON: Before you finish. 19 Vague. Incomplete. His declaration speaks for 20 itself. 21 A. Figure 7, in particular. 22 Q. And so is it your position that	Page 68 1 second filament in Figure 7? 2 A. There appears to be, as labeled "706," 3 but not detailed. 4 Q. And so for two filaments to be 5 separate, under your definition of that term, do 6 the filaments need to have a space between them, 7 like we see in Figure 7? 8 MR. HAMILTON: Objection. Vague. 9 Mischaracterizes the testimony. 10 A. They don't require that. No. 11 Q. So if the space in Figure 7 that you 12 helpfully identified as item 706, if that space 13 didn't exist and the two filaments pressed up 14 against each other, would it still be your 15 position that the filaments are separate? 16 A. Yes. 17 Q. So when you rendered your opinion 18 regarding validity of the '384 patent, what are 19 your criteria for a first and second filament to 20 be "separate"? 21 MR. HAMILTON: Objection. Vague. 22 A. I really don't understand the question.
Page 67 1 Figure 7 illustrates separate first and second 2 filaments? 3 A. Yes. 4 Q. And under your opinion, what is it 5 about the filaments in Figure 7 that makes them 6 separate? 7 A. They are clearly depicted as two 8 individual filaments. 9 Q. And just so we're clear, is it your 10 understanding that the first and second filaments 11 in Figure 7 are labeled "150-A" and "150-B"? 12 A. Yes. 13 Q. So you had testified that the filaments 14 in Figure 7 are clearly depicted as two 15 individual filaments. 16 Why do you believe that that is clearly 17 depicted? 18 MR. HAMILTON: Objection. Asked and 19 answered. 20 A. It's a simple graphic. 21 Q. Based on the graphic in Figure 7, is 22 there a space between the first filament and the	Page 69 1 Q. Well, I think we've established that 2 two filaments can be separate, even if they don't 3 have a space between them. 4 Is that fair? 5 A. Yes. 6 Q. And so what, in your definition of 7 "separate," is required for two filaments to be 8 "separate"? 9 MR. HAMILTON: Objection. Vague. 10 A. Each filament is a separate physical 11 element, an individual element on its own. 12 Q. So you said they're "a separate 13 physical element" and "an individual element on 14 its own." 15 Are those two descriptions the same thing? 16 A. Yes. 17 Q. Okay. What do you mean by "an 18 individual element on its own"? 19 A. It's a separate physical entity. 20 Q. So going back to my example of a string 21 with two threads that are wound around each 22 other -- do you have that in your mind?

Page 70	Page 72
1 A. Yes. 2 Q. -- why isn't the first thread in that 3 string a separate physical entity? 4 A. That individual thread is a separate 5 entity prior to being wound into a string. It's 6 no longer a separate entity in a configuration of 7 a string. 8 Q. And why not? 9 A. It's intertwined or integrated with 10 another separate entity, so it's no longer 11 independent. 12 Q. Would you agree with me that there are 13 strings out there where you can visually see the 14 independent threads within the string? 15 A. Yeah. I think we can all imagine a 16 wire, if you will, with separate smaller wires 17 intertwined, different colors, so yes. 18 Q. And have you had experience with those 19 types of wires in your career? 20 A. As an electrician helper during college 21 summers, yes. 22 Q. And so in rendering your opinions for	1 filaments form an X, and they are a "separate 2 physical entity" under your definition? 3 MR. HAMILTON: Objection. Vague. 4 Calls for speculation. 5 A. In your suggested configuration, they 6 only interact at the juncture of the X at one 7 point in space. And in that configuration you're 8 hypothesizing, they act as independent entities, 9 and, therefore, could be considered separate 10 filaments. 11 Q. And when you say "act as independent 12 entities," what do you mean by that? 13 A. They're not dependent on an 14 accompanying or integrated other element. 15 Q. So how many points would the threads 16 have to interact at for them to no longer be 17 separate physical entities? 18 A. There's no straightforward answer to 19 that question, frankly. 20 Q. Why do you say that? 21 A. You're describing one of a million 22 alternative configurations, where they contact
Page 71	Page 73
1 the '384 patent, is it your opinion that a thread 2 within a string or wire that you can physically 3 see still is not a separate physical entity? 4 MR. HAMILTON: Objection. Vague. 5 A. It's only a separate physical entity 6 prior to its integration with other separate 7 entities. 8 Q. And so if I had two threads that 9 crossed each other in an X -- can you envision 10 that? 11 A. Sure. 12 Q. -- would those threads be "separate 13 physical entities" under your definition? 14 A. They could be, yes. They could be. 15 Q. And why do you say that? 16 A. It depends on the actual ultimate 17 geometry of those two separate threads. Are they 18 not intertwined at all? Are they partially 19 intertwined, at which point they're not separate 20 filaments? 21 So it depends on the ultimate geometry. 22 Q. And so what is the geometry where the	1 each other twice or a thousand times. So the 2 action and the physical configuration is 3 different for those million different 4 alternatives. 5 Q. And so if we have two threads, how many 6 points would those threads have to interact at 7 for them to no longer be "separate physical 8 entities," under your definition of that term 9 that you've used in forming your opinions? 10 A. Again, there's no obvious answer to 11 that. It depends on the configuration. But, in 12 general, after one contact point, in general, 13 they're no longer independent filaments. 14 Q. So if we look at the '384 patent, and 15 we go to Figure 9, is it your position that 16 because those filaments interact at one contact 17 point where 800-A meets 800-B, that they are no 18 longer independent filaments? 19 A. No. Figure 9 simply depicts a closure 20 state of the filaments that have been 21 independently pulled to effect the constriction. 22 Q. Do you agree with me, though, that in

Page 74 1 Figure 9, it depicts the two filaments 2 interacting at a contact point? 3 A. No. I wouldn't describe that as 4 interacting. 5 Q. Why not? 6 A. In the context of the preceding 7 figures, they are independent filaments that are 8 simply shown in the pulled configuration in 9 Figure 9, operating independently. 10 Q. So when you use the term "interacting," 11 what do you mean by that -- 12 A. I think you used that term. I don't 13 think I used that term. 14 Q. When you use the term "contact point," 15 what are you referring to? 16 A. In this figure, it shows, actually 17 unrealistically, because there's no enclosed 18 sleeve or tube, the separate filaments in contact 19 with each other. 20 Q. And so would Figure 9 depict a "contact 21 point," as you used the term "contact point"? 22 A. It appears to, but that doesn't reflect	Page 76 1 what do you mean? 2 A. Cause some effect in between one and 3 the other, physical or otherwise. 4 Q. So looking at the '384 patent, in 5 Figure 9, would filament 150-B cause some effect 6 on filament 150-A if filament 150-B continued to 7 be pulled in the direction of the arrow 810? 8 A. Again, this figure is misleading 9 because of no enclosed tube or sleeve. And in 10 the actual context of the patent, the filaments 11 are not -- would not interact with each other. 12 Q. But let's use Figure 9 as an example. 13 I understand that the tube would be placed 14 within the two tubes. But let's use the way that 15 it's specifically drawn here. 16 As it's drawn, where the two filaments are 17 in contact with each other, would filament 150-B 18 cause some effect on filament 150-A if filament 19 150-B continued to be pulled in the direction of 20 810 under your definition of "contact"? 21 MR. HAMILTON: Objection. 22 Mischaracterizes the document. Asked and
Page 75 1 the actual use of the filaments. 2 Q. So under your opinion in this case, two 3 filaments can be separate, even if there's no 4 space between them, and even if there's a contact 5 point between them; is that correct? 6 A. Yes. 7 Q. Under your opinion in this case, could 8 two filaments be separate if there was more than 9 one contact point between them? 10 A. Theoretically, yes. 11 Q. And in what situation can you envision 12 that occurring? 13 A. That's my answer. 14 Q. Unfortunately, that won't show up on 15 the record. 16 A. Configurations where they don't 17 actually affect each other. 18 MR. HAMILTON: Just to be clear, when 19 he said "that's my answer," there was an audible 20 horn blowing outside the room. And that's what 21 Mr. Zalesky was referring to. 22 Q. And when you say "affect each other,"	Page 77 1 answered. 2 A. Yeah. I'll say just one more time, 3 it's not an accurate depiction of the action of 4 these separate filaments. 5 Q. So let's envision a situation where we 6 have two filaments, each of which form a U-shape 7 that look like what is shown in Figure 9. 8 Can you picture that? 9 A. Okay. 10 Q. And if we continued to pull on filament 11 150-B in the direction of the arrow 810, in that 12 embodiment that we're imagining, would it cause 13 some effect on filament 150-A? 14 MR. HAMILTON: Objection. Vague. 15 Asked and answered. Incomplete hypothetical. 16 A. If these filaments are in free space 17 and one is tugging the other, there's going to be 18 an effect. 19 Q. And in that example, would you consider 20 those filaments to still be "separate"? 21 A. In that very specific hypothetical, 22 yes.

Page 78 1 Q. Why? 2 A. They continue to be independent, 3 separate physical entities. 4 Q. And why do you believe they continue to 5 be independent, separate physical entities? 6 A. Their composition/structure remains 7 intact. 8 Q. And what about the 9 composition/structure makes them separate, in 10 your mind? 11 A. Each has a physical exterior, a 12 discrete physical exterior. 13 Q. So in my example of a string made of 14 two threads wound around each other -- do you 15 have that in your head? 16 A. Sure. 17 Q. -- is it your position that each thread 18 does not have a physical exterior? 19 A. Each thread, prior to its integration 20 into a string, has a distinguishable physical 21 exterior. 22 Once integrated into a multithread string,	Page 80 1 longer be separate? 2 A. There's no straight answer to that 3 question. It really is a function of the final 4 configuration of those threads. 5 Q. And so is it fair to say that you would 6 have to examine the final structure of the 7 threads in order for you to be able to tell 8 whether or not the threads are separate? 9 MR. HAMILTON: Objection. Vague. 10 A. More specifically, I'd examine the 11 string, which is composed of the separate 12 threads, because the string is now the entity of 13 note. 14 Q. So based on your experience and your 15 position as a person of ordinary skill in the 16 art, can you think of any strings comprised of 17 threads where you would consider the threads as 18 being separate filaments? 19 MR. HAMILTON: Objection. Vague. 20 Calls for speculation. Beyond the scope of his 21 Direct testimony. Incomplete hypothetical. 22 A. Not easily, no.
Page 79 1 that property is no longer there. 2 Q. Let's take two threads that are 3 parallel to each other, but touching. There's no 4 space between them. 5 Do you have that in your head? 6 A. Yes. 7 Q. Do those threads have a "separate 8 physical exterior" under your definition? 9 A. Yes. 10 Q. And why do you say that? 11 A. To your point, they are separate 12 threads at that particular point. 13 Q. And why do you believe they have a 14 separate physical exterior? 15 MR. HAMILTON: Objection. Asked and 16 answered. 17 A. In that configuration, they're 18 independent entities. 19 Q. And so if we have separate -- two 20 separate threads, under your definition of the 21 word "separate," how much integration needs to 22 happen between those threads for them to no	Page 81 1 Q. And you say "not easily." 2 Can you do it if you put some thought into 3 it? 4 MR. HAMILTON: Same objections. 5 A. I'm really just pure speculating. 6 Q. And do you have a speculative answer? 7 A. I don't. 8 Q. And is that something that you 9 considered when you were forming the opinions 10 that you've rendered regarding the validity of 11 the '384 patent? 12 A. No. 13 Q. So we were discussing your 14 understanding that Claim 1 requires separate 15 first and second filaments, and you had 16 identified Figure 7 from the specification as 17 part of the reason you hold that belief. 18 Are there any other portions of the 19 specification that you relied on in reaching that 20 conclusion? 21 A. I'd have to re-review the written 22 description, in particular, the detailed

Page 82 1 description, and the selected embodiments. 2 But I'm pretty sure there are redundant, if 3 you will, or complementary written descriptions 4 of that same independent filament configuration. 5 Q. So when you say "redundant or 6 complementary written descriptions," are you 7 referring to the portions of the specification 8 that describe Figure 7? 9 A. Certainly including that, yes. 10 Q. And as we sit here, do you recall any 11 other specific portions of the '384 patent that 12 you relied on for your opinion that Claim 1 13 requires separate first and second filaments? 14 A. I'd have to re-review the written 15 description body. But if memory serves, there 16 are specific references to "first and second 17 filament." 18 Q. And so those would have been the 19 portions of the specification that you relied on 20 for your opinion that Claim 1 requires separate 21 first and second filaments? 22 A. As a POSITA, I think Figure 7, frankly,	Page 84 1 filaments? 2 A. Yes. 3 Q. Are there any other figures in the 4 patent that are consistent with your 5 interpretation of Claim 1, as requiring separate 6 first and second filaments? 7 A. So, certainly Figure 8 and Figure 9. I 8 have to go back to see if there are other 9 figures. It looks like 7, 8, and 9. 10 Q. Looking at Figure 7 of the '384 patent, 11 earlier we discussed that there was a space 12 between the filaments. 13 Do you recall that? 14 A. Yes. 15 Q. And is it your understanding that, in 16 operation of the device, the filaments would be 17 or the ends of the filaments would be pulled such 18 that the loops would constrict around the tubular 19 member inserted through the loop? 20 A. Yes. 21 Q. When that constriction occurs, would 22 the portion of the tube that is between the two
Page 83 1 speaks for itself. 2 Q. And so is it your opinion that Claim 1 3 of the '384 patent covers the filament 4 configuration shown in Figure 7? 5 MR. HAMILTON: Objection. Vague. 6 Beyond the scope of his testimony. Incomplete 7 hypothetical. 8 A. If you used the word "consistent," I 9 would say yes. I'm not sure the actual word you 10 used with regard to Claim 1. 11 Q. I said, "So is it your opinion that 12 Claim 1 of the '384 patent covers the filament 13 configuration shown in Figure 1?" 14 MR. HAMILTON: Objection. Vague. 15 Incomplete hypothetical. Beyond the scope of his 16 Direct testimony. 17 A. Those aren't the words I would choose. 18 Q. What are the words you would choose? 19 A. As I said a minute ago, "consistent." 20 Q. So you believe Figure 7 of the '384 21 patent is consistent with your interpretation of 22 Claim 1, as requiring separate first and second	Page 85 1 filaments in that space 706 also be constricted? 2 MR. HAMILTON: Objection. Vague. 3 Incomplete. 4 A. Not necessarily. 5 Q. And why do you say "not necessarily"? 6 A. This is all hypothetical. If a very 7 minuscule space exists, that segment of tubular 8 structure is all going to be compressed. 9 If they're separated by a significant 10 distance, the middle of that tubular structure 11 will not be compressed. 12 Q. And so looking at Figure 7 and the gap 13 706 in this figure, would you consider that to be 14 a minuscule space that would be compressed? 15 MR. HAMILTON: Objection. Vague. 16 Incomplete hypothetical. Mischaracterizes the 17 document. 18 A. My interpretation of the 706 callout is 19 simply delineation of two separate independent 20 filaments. 21 Q. And in Figure 7, I think we agree that 22 there's a space depicted between the two

Page 86 1 filaments, correct? 2 A. That's what the figure depicts. Yes. 3 Q. And based on your expertise as a person 4 of ordinary skill in the art, are you able to 5 offer an opinion as to whether the tube that lies 6 between the two filaments in this embodiment in 7 Figure 7 would be constricted when the loops are 8 constricted? 9 MR. HAMILTON: Objection. Vague. 10 Incomplete hypothetical. Beyond the scope of his 11 direct testimony. 12 A. Yeah. I really didn't address that. 13 Q. So earlier you said if there was a 14 minuscule space between the filaments, that the 15 portion of the tube across that space would be 16 compressed. 17 What did you mean by "minuscule space"? 18 A. Microns, as opposed to feet. 19 Q. Can you be any more precise in terms of 20 what you mean by a "minuscule space"? 21 MR. HAMILTON: Objection. Asked and 22 answered.	Page 88 1 MR. HAMILTON: Objection. Vague. 2 Incomplete hypothetical. 3 A. Yeah. Again, I can't answer that 4 without reference to the enclosed tube or tubular 5 structure. 6 Its physical properties have a lot to do 7 with what would or could happen. 8 Q. So are there tubular members that would 9 have physical properties where the portion of the 10 tube spanning between the space between the 11 filaments -- sorry, let me start over. 12 Are there tubular members that would have 13 physical properties that would allow that tubular 14 member to compress if the space between the 15 filaments were 5 millimeters? 16 MR. HAMILTON: Objection. Vague. 17 Incomplete hypothetical. 18 A. In general, that's very unlikely. 19 Theoretically, there could be a certain 20 compliance or lack of compliance tubular 21 structure, whereby compression at two spots, 22 millimeters apart from each other, would bring
Page 87 1 A. Yeah. Microns to the lower limit of 2 zero. 3 Q. What about 1 millimeter? Would that be 4 a minuscule space, where the tube would be 5 compressed if the loops were constricted? 6 MR. HAMILTON: Objection. Incomplete 7 hypothetical. 8 A. Yeah. I can't answer that without a 9 specification of the enclosed tube. 10 Q. Can you envision embodiments, based on 11 your position as a person of ordinary skill in 12 the art, where a space of a millimeter would 13 result in the tube crossing that space being 14 compressed when the filaments are constricted? 15 A. Theoretically, given a very particular 16 composition of that tube, in terms of rigidity, 17 theoretically. 18 Q. Based on your experience in the field 19 and as a person of ordinary skill in the art, was 20 the largest space between the filaments that you 21 can envision being compressed when the filaments 22 are constricted around the tubular member?	Page 89 1 the in-between segment also compressed, 2 theoretically. 3 Q. Based on your review of the '384 4 patent, does the '384 patent identify any 5 drawbacks to having a space between the filaments 6 like the one illustrated in Figure 7? 7 A. I don't recall specific reference to 8 "drawback" or the equivalent of "drawback" 9 terminology, but the space supports the 10 independence of separate filaments. 11 Q. Would a person of ordinary skill in the 12 art, in September 2017, have ever seen any 13 drawbacks to having a space between the first and 14 second filament, as shown in Figure 7? 15 MR. HAMILTON: Objection. Vague. 16 A. I didn't address that, so I don't think 17 so. But I didn't address that. 18 MR. STOWELL: Okay. Why don't we take 19 a break. 20 THE VIDEOGRAPHER: The time is now 21 11:26, and we are off the record. 22 (A recess was taken.)

Page 90 1 THE VIDEOGRAPHER: The time is now 2 11:35, and we are on the record. 3 BY MR. STOWELL: 4 Q. Dr. Zalesky, did you discuss your 5 deposition testimony with anybody during the 6 break? 7 A. No. 8 Q. Did you review any documents? 9 A. No. 10 Q. If you could pull out the '834 11 patent -- or the '384 patent, Exhibit 1001. And 12 turn to column 13. 13 And let me know when you're there. 14 A. Okay. 15 Q. I'm going to go down to line 40 of 16 column 13, where it begins, "Similarly, in 17 embodiments containing the filament 150 having 18 multiple loops, one or several of the multiple 19 loops can be interlocking..." do you see where 20 I'm reading? 21 A. Yes. 22 Q. And would you agree with me when it's	Page 92 1 they're not interlocking. 2 In Figure 9, one could argue they are 3 interlocking. 4 Q. So when you read that section of 5 column 13, beginning at line 40, that refers to 6 "One or several of the multiple loops can be 7 interlocking," how do you understand the term 8 "interlocking" being used? 9 A. Fundamentally, they are interacting 10 with each other, as opposed to operating 11 independently. 12 Q. Would it be fair to describe 13 "interlocking" as one loop passing through the 14 other loop? 15 A. No. I think, in combination, they 16 create a loop. 17 MR. HAMILTON: Objection. Vague. 18 Mischaracterizes the document. 19 Q. So your interpretation of 20 "interlocking," are you interpreting the loops as 21 being still parallel to each other? 22 MR. HAMILTON: Objection. Vague.
Page 91 1 referring to "embodiments having multiple loops" 2 that Figure 7 of the '384 patent would be one 3 such embodiment? 4 A. Figure 7 has two, as in multiple loops, 5 yes. 6 Q. And do you agree with the description 7 in the '384 patent that that embodiment could 8 have one or several of the multiple loops be 9 interlocking? 10 MR. HAMILTON: Objection. Vague. 11 A. I think the keyword in the language 12 here is "can," as in "can be interlocking," are 13 not necessarily interlocking. 14 Q. Agreed. And can you envision 15 situations where the multiple loops would be 16 interlocking? 17 A. I'm hesitating because of the word 18 "interlocking," which probably means different 19 things to different POSITAs. 20 One interpretation would be as opposed to 21 being in parallel, and, therefore, not 22 interacting, whereas in Figure -- so Figure 7,	Page 93 1 A. No. I think, when parallel, there's no 2 interaction. 3 Q. And so when you said, "they are 4 interacting with each other when they're 5 interlocking," what did you mean by that? 6 A. As depicted in Figure 9, they're not in 7 parallel and separated from each other. 8 Q. If we had a situation, as described 9 beginning at line 40 of column 13, where one or 10 several of the multiple loops were interlocking, 11 would you consider those filaments to be 12 "separate"? 13 MR. HAMILTON: Objection. Vague. 14 A. Yes. 15 Q. And why would you consider them to be 16 separate, even though they are interlocking? 17 A. As I said earlier, they're interacting, 18 but they retain their individual structure. 19 Q. With the embodiment that's described in 20 column 13, beginning at line 40, where there are 21 one or several multiple loops that are 22 interlocking, would a person of ordinary skill in

Page 94 1 the art have been concerned about interference 2 between the interlocking loops? 3 MR. HAMILTON: Objection. Incomplete 4 hypothetical. Vague. 5 A. I don't really understand the question. 6 Q. Okay. So do you understand the 7 embodiment that's described in column 13, 8 beginning at line 40, where it describes "the 9 embodiment containing the filament 150 having 10 multiple loops, one or several of the multiple 11 loops can be interlocking," do you understand 12 what that is describing? 13 A. I don't think this is particularly well 14 written. Figure 9, consistent with that written 15 description language you're citing, doesn't show 16 multiple loops. 17 Q. So earlier we discussed this language, 18 and I think we agreed that the language describes 19 the embodiment in Figure 7, except that the loops 20 would be interlocking. 21 Is that accurate? 22 A. Just to clarify, in Figure 7, they're	Page 96 1 concentrated force at one spot or one location on 2 the enclosed tubular structure. 3 Q. And so is it your opinion that that 4 fairly concentrated force would eliminate or 5 minimize any interference? 6 MR. HAMILTON: Objection. Vague. 7 Incomplete hypothetical. 8 A. I think it makes interference, again, 9 using the assumption I just raised, unlikely. 10 Q. If interference were observed between 11 the interlocking loops, is there anything that a 12 POSITA, in September of 2017, could have done to 13 address that interference? 14 MR. HAMILTON: Objection. Vague. 15 Incomplete hypothetical. Beyond the scope of 16 Direct. 17 A. I certainly didn't address that 18 potential situation. 19 Q. And as person of ordinary skill in the 20 art, are you able to think of any actions a 21 person of ordinary skill in the art could have 22 taken, in September 2017, to address interference
Page 95 1 not interlocking. 2 Q. Correct. But you would agree with me 3 that there are multiple loops in Figure 7, 4 correct? 5 A. Yes. 6 Q. And if those two loops in Figure 7 were 7 interlocking, it would create the embodiment 8 described in column 13, beginning at line 40, 9 correct? 10 A. Yes. I think that's correct. 11 Q. So in that embodiment, the Figure 7, 12 with interlocking loops, would a person of 13 ordinary skill in the art, in September 2017, 14 have been concerned about interference between 15 the interlocking loops in that embodiment? 16 A. When you say "interference," I'm 17 assuming you mean interferes with the closure 18 effect, and I don't think a POSITA would be 19 immediately concerned with that. 20 Q. Why not? 21 A. Consistent with Figure 9, but expanded 22 to include two or more loops, there's a fairly	Page 97 1 between the interlocking loops? 2 MR. HAMILTON: Same objections. 3 A. This is pure speculation, but one could 4 consider different physical properties of the 5 filaments to minimize interference. 6 Q. By "different physical properties," 7 what do you mean? 8 A. Well, again, I didn't address this, so 9 this is pure speculation. But stiffness. 10 Q. What about the material of the 11 filaments? Could that have an impact on 12 interference? 13 MR. HAMILTON: Objection. Vague. 14 Incomplete hypothetical. Beyond the scope of 15 Direct. 16 A. The material and the construction of 17 the material is directly related to stiffness. 18 Hence, why I used the word "stiffness." 19 Q. Would you agree with me that the '834 20 [sic] patent does not discuss any drawbacks 21 related to interference between multiple 22 filaments?

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1 A. I don't recall any reference to 2 interference. 3 Q. In rendering your opinions in this IPR 4 related to the '384 patent, did you consider the 5 prosecution history of the '384 patent? 6 A. I looked at only a very brief excerpt 7 or two from the prosecution history and relied on 8 patent counsel for an overall description. 9 Q. So for the parts that you reviewed of 10 the prosecution history, is that something you 11 did on your own, outside of instruction from 12 counsel? 13 MR. HAMILTON: Objection. Vague. To 14 the extent your answer reveals communications, 15 I'm instructing you not to answer. 16 A. So no answer. 17 Q. Well, I think you can answer yes or no. 18 I'm just trying to establish whether the parts 19 you reviewed of the prosecution history, did you 20 review those parts at the direction of counsel? 21 MR. HAMILTON: Same instruction. To 22 the extent your answer reveals communications	1 court reporter to mark as Exhibit 1058 a document 2 from the prosecution history of Application 3 Number 18-598,482. 4 (Document from the prosecution 5 history of Application Number 18-598,482 6 marked Exhibit 1058.) 7 MR. HAMILTON: You said 1058? 8 MR. STOWELL: Correct. 9 BY MR. STOWELL: 10 Q. Dr. Zalesky, please take a look at the 11 document. And then let me know if this is a 12 document that you considered in forming your 13 opinions that are expressed in your declaration 14 regarding the '384 patent. 15 MR. HAMILTON: Objection. The 16 declaration speaks for itself. 17 A. It appears to be. Yes. 18 Q. Okay. And how did you rely upon this 19 document in forming your opinions? 20 MR. HAMILTON: Same objection. 21 A. I didn't. 22 Q. You didn't rely upon this document in
Page 99	Page 101
1 with counsel, I'm instructing you not to answer. 2 A. So I reviewed selected segments 3 independently. 4 Q. For the segments you reviewed 5 independently, do you remember what segments you 6 reviewed? 7 A. The incredibly brief comment from the 8 patent examiner, citing differentiation from 9 prior art. 10 Q. And did the portions of the prosecution 11 history that you reviewed influence any of the 12 opinions you offered in your declaration related 13 to the '384 patent? 14 MR. HAMILTON: Objection. His 15 declaration speaks for itself. 16 A. No. No. 17 Q. No. Did you rely on any part of the 18 prosecution history for your opinion that Claim 1 19 requires separate first and second filaments? 20 MR. HAMILTON: Same objection. 21 A. No. 22 MR. STOWELL: I'm going to ask the	1 forming your opinions? 2 A. I did not. 3 Q. Okay. 4 MR. STOWELL: I'll have the court 5 reporter mark as Exhibit 1059 a document titled 6 "Notice of Allowance and Fees Due for Application 7 Number 18-598,482. 8 (Document titled "Notice of 9 Allowance and Fees Due for Application 10 Number 18-598,482" marked Exhibit 1059.) 11 BY MR. STOWELL: 12 Q. Dr. Zalesky, can you review 13 Exhibit 1059 and let me know if you relied upon 14 this document in forming the opinions you 15 expressed in your declaration related to the '384 16 patent. 17 MR. HAMILTON: Objection. Vague. His 18 declaration speaks for itself. 19 A. Again, no. 20 Q. Do you recognize this document? 21 A. Yes. 22 Q. Okay. So it's a document you reviewed

Page 102 1 at some point; do you believe? 2 A. Yes. Briefly. 3 Q. Okay. But it's not a document you 4 relied upon in forming the opinions expressed in 5 your declaration relating to the '384 patent, 6 correct? 7 MR. HAMILTON: Same objections. Vague. 8 His declaration speaks for itself. 9 A. I did not rely on this for expressing 10 my opinion. No. 11 Q. Okay. Can you pull out your 12 declaration, Exhibit INARI-2001. 13 A. Mm-hmm. 14 Q. Okay. And do you recognize 15 Exhibit 2001 as the declaration you submitted in 16 this IPR related to the '384 patent? 17 A. Yes. 18 Q. If we turn to page 73 of the 19 declaration, is that your signature? 20 A. Yes. 21 Q. And did you sign this declaration on 22 December 29, 2025?	Page 104 1 like to change? 2 A. No. 3 Q. Can we turn to paragraph 74 of the 4 declaration, Exhibit 2001. And let me know when 5 you're there. 6 A. I'm there. 7 Q. And in paragraph 74, you quote an 8 argument that was made by the petitioner, 9 correct? 10 A. Yes. 11 Q. And to summarize the argument, 12 "Petitioner argued that two strings, each wrapped 13 around a tube once, would result in less friction 14 than one string wrapped around a tube twice." 15 Is that an accurate summary of the argument 16 you were responding to? 17 MR. HAMILTON: Objection. The document 18 speaks for itself. 19 A. Yes. 20 Q. Okay. And I understand, based on 21 paragraph 74 and 75, that you disagree with 22 petitioner's argument; is that correct?
Page 103 1 A. Yes. 2 Q. And where were you when you signed this 3 declaration? 4 A. In East Greenwich, Rhode Island. 5 Q. And the declaration states that you 6 declare that "all statements made..." in -- 7 "...made herein of my knowledge are true." 8 Do you believe that the statements in this 9 declaration are true? 10 A. Yes. 11 Q. Did you do your best to make sure that 12 the statements within the declaration were 13 accurate? 14 A. Yes. 15 Q. Are you aware of any errors in this 16 declaration, Exhibit 2001? 17 A. I'm not aware. No. 18 Q. Are there any opinions stated in the 19 declaration, Exhibit 2001, that you would like to 20 withdraw? 21 A. No. 22 Q. Are there any opinions that you would	Page 105 1 MR. HAMILTON: Same objection. The 2 document speaks for itself. 3 A. Yes. 4 Q. And, in fact, at the end of paragraph 5 75, you state, "A POSITA would understand that 6 the friction is the same in petitioner's proposed 7 two-string arrangement as in Hartley's 8 single-string arrangement, such that a POSITA 9 would not have been motivated to use two of 10 Hartley's string 14 instead of one to reduce 11 friction." 12 Do you see that -- 13 A. I do. 14 Q. Okay. And by this, do you understand 15 petitioner's proposed two-string arrangement to 16 refer to two separate strings, each wrapped 17 around the tube once? 18 MR. HAMILTON: Objection. Vague. 19 A. Yes. 20 Q. And do you understand Hartley's 21 single-string arrangement to refer to a single 22 string wrapped around the tube twice?

Page 106 1 MR. HAMILTON: Same objection. Vague. 2 A. Yes. 3 Q. In reaching your conclusions in 4 paragraph 74 to 75, did you rely on any 5 scientific equations to reach that conclusion? 6 MR. HAMILTON: Objection. Vague. 7 A. I did not. 8 Q. Did you rely on any mathematical 9 equations to reach that conclusion? 10 MR. HAMILTON: Same objection. 11 A. I'm only hesitating because, in my 12 mind's eye, I envisioned the surface contact 13 geometry, which you could argue is an equation, 14 but I didn't use an actual equation. 15 Q. Did you produce any calculations when 16 you reached this opinion stated in paragraph 74 17 and 75? 18 A. No. 19 Q. Are you familiar with the Capstan 20 equation? That's C-A-P-S-T-A-N. 21 A. You'll have to remind me. 22 Q. Did you consider the Capstan equation	Page 108 1 Q. You specifically say "back bleed." 2 What did you mean by "back bleed"? 3 A. The tubular structure is inserted into 4 a vessel, either an artery or vein, which has 5 some pressure, hydrostatic pressure which, left 6 unblocked, forces the blood backwards, tends to 7 turn back bleed. 8 Q. And so for -- how long would the blood 9 pool need to be stagnant in order for a thrombus 10 or clot to form? 11 MR. HAMILTON: Objection. Vague. 12 Incomplete hypothetical. 13 A. Depending on the surface, the inside 14 surface of the tubular structure that the blood 15 is contacting, thrombus formation starts 16 immediately. 17 The extent of thrombus will be a function of 18 both the surface it's in contact with and the 19 coagulation profile of the blood of that patient. 20 Q. And so hemostasis valves are used in 21 many intravascular procedures. 22 Would you agree?
Page 107 1 in rendering your opinions in paragraph 74 and 2 75? 3 A. I didn't consider any equations. 4 Q. And so it's fair to say you did not 5 consider the Capstan equation; is that correct? 6 A. Yes. 7 Q. Can we turn now to paragraph 78 of 8 Exhibit 2001. Just let me know when you're 9 there. 10 A. I'm there. 11 Q. Okay. In paragraph 78, the portion on 12 page 45, you state, "The gap between the strings 13 would create a stagnant blood pool from back 14 bleed, that in turn can lead to thrombus (clot) 15 formation." 16 Do you see that? 17 A. Yes. 18 Q. Now, why did you refer to "stagnant 19 blood pool"? 20 A. The constriction of the tubular 21 structure halts the flow of blood, and it then 22 becomes stagnant.	Page 109 1 A. Yes. 2 Q. And so is it your opinion that thrombus 3 start forming immediately when the blood contacts 4 the hemostasis valve during intravascular 5 procedures? 6 MR. HAMILTON: Objection. Vague. 7 Mischaracterizes the document. 8 A. There's always at least a microscopic 9 clot formation. Yes. 10 Q. In your experience, how long does 11 stagnant blood need to be in contact with a 12 hemostasis valve to form a thrombus or clot that 13 becomes medically problematic? 14 MR. HAMILTON: Objection. Incomplete 15 hypothetical. 16 A. In a hypercoagulable patient, it could 17 be seconds. In most patients, it would be 18 probably anything over a minute and a half. 19 Q. Would you agree that most patients 20 undergoing an intravascular procedure would be 21 typically put on some sort of anticoagulant 22 medication?

Page 110 1 MR. HAMILTON: Objection. Beyond the 2 scope of Direct. 3 A. It's a function of the procedure. In 4 most procedures, yes, but not all. 5 Q. In the situation where a patient was on 6 an anticoagulant, based on your experience, how 7 long would it typically take for a thrombus or 8 clot to form on a hemostasis valve that became 9 medically problematic? 10 MR. HAMILTON: Objection. Incomplete 11 hypothetical. 12 A. It's literally all over the map, 13 depending on the extent of anticoagulation, the 14 anticoagulant pharmacologic used, and the 15 patient, and the materials in contact with. 16 So impossible to specify. 17 Q. In your experience, using hemostasis 18 valves, were you typically concerned with 19 thrombus and clot formation on the valve? 20 A. Not on the valve itself. On adjacent 21 tubular structure lumen. 22 Q. And in your experience, having worked	Page 112 1 A. Yeah. Per my last comment, the actual 2 source was indeterminant. 3 Q. So you can't recall any cases where the 4 source of the emboli was pinpointed to contact 5 between the blood and the hemostasis valve. 6 Is that fair? 7 A. I could not, a physician could not 8 unequivocally say the clot came from the 9 hemostasis valve, specifically. 10 Q. Okay. Let's go back to the '384 11 patent, Exhibit 1001. And let's look at Figure 2 12 of that patent. 13 Let me know when you're there. 14 A. I'm there. 15 Q. In -- Figure 2 illustrates item 140, 16 which is referred to in the patent as "retention 17 features," correct? 18 A. Yes. 19 Q. And do you understand what the 20 "retention features" are? 21 A. Yes. 22 Q. What is the retention feature?
Page 111 1 with hemostasis valves, can you recall any 2 situations where a contact of the blood with the 3 hemostasis valve caused a thrombus or clot that 4 was medically problematic? 5 A. That's really hard to answer, having 6 seen literally hundreds of procedures, maybe 7 thousands. 8 There were certainly some cases where emboli 9 somehow were produced. Where they came from was 10 indeterminate. "Emboli" being clots. 11 Q. Are there any cases that you can 12 recall, based on your considerable experience, 13 where the emboli was caused by contact between 14 the blood and the hemostasis valve? 15 A. So repeat that. I'm not sure exactly 16 what you're asking. 17 Q. Are there any cases that you can 18 recall, based on your considerable experience, 19 where the emboli was caused by contact between 20 the blood and the hemostasis valve? 21 MR. HAMILTON: Objection. Asked and 22 answered.	Page 113 1 A. It physically retains the actuator or, 2 put another way, prevents it from escaping its 3 channel. 4 Q. So if we look at Figure 2 and we look 5 at the top half of the device, and we look at the 6 right-hand side of the button, we see an item 7 number 140 with a line drawn. 8 Do you see where I'm at? 9 A. I see 140, yes. 10 Q. Okay. In your -- what is your 11 understanding of what portion of that structure 12 is the retention feature? 13 A. The -- I'm trying to come up with a 14 simple way to describe this. The leftmost 15 portion of the structure in 140 is in contact 16 with the actuator structure, and that particular 17 leg, if you will, retains or is the retention 18 device for the actuator construction. 19 (Background noise) 20 THE VIDEOGRAPHER: I think we're okay, 21 but we're getting them a little bit. So... 22

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1 BY MR. STOWELL: 2 Q. So if we look at Figure 2, you had 3 mentioned a left-hand side. There's an item 4 number 148-A, and there's a line that is drawn to 5 a portion where the retention feature seems to 6 meet the button. 7 Do you see where I'm looking at? 8 A. I do. 9 Q. Okay. So is that the leftmost side of 10 the retention feature? 11 A. That's what I was referencing. Yes. 12 Q. Okay. And then, in your opinion, how 13 far to the right does the retention feature 14 extend? 15 A. Hard to answer that. The retention 16 feature is integral to the structure. So where 17 it begins and ends is qualitative. 18 Q. Do you believe that the portion below 19 140, extending down towards number 130, is part 20 of the retention feature? 21 A. As I said, it's an integral structure, 22 so yes and no both. The actual retainer is at	1 mechanism. 2 Q. So you believe that if the retention 3 features were not included in Figure 2, the 4 buttons could fall out of the housing? 5 Is that correct? 6 A. Yes. 7 Q. And do you believe that's true, even 8 though when the pressure on the buttons is 9 released, the tubular member expands? 10 MR. HAMILTON: Objection. Vague. 11 Incomplete hypothetical. 12 A. I'm not sure what you're asking. 13 You're asking -- say that again. 14 Q. Let me try it this way. In order for 15 the buttons to fall out of the housing, there 16 would need to be enough slack in the filament for 17 the button to move past the end of the housing. 18 Do you understand what I'm saying? 19 A. Yes. 20 Q. And would you agree with me that when 21 no pressure is applied to the buttons, that they 22 are wrapped around the tubular member in a
Page 115	Page 117
1 the 148-A location. 2 Q. Now, in this embodiment, would you 3 agree with me that the buttons are coupled to the 4 filament? 5 A. Yes. 6 Q. And would you agree that the buttons 7 are also coupled to the spring? 8 A. Yes. 9 Q. And in this embodiment, is it your 10 understanding that the filament extends in a loop 11 around the tubular member? 12 A. Yes. 13 Q. If we removed the retention feature, 14 140, would the device or the hemostasis valve 15 pictured in Figure 2 still work? 16 MR. HAMILTON: Objection. Incomplete 17 hypothetical. 18 A. The short answer is "sort of." 19 Q. You probably know where I'm going. But 20 why do you say "sort of"? 21 A. Without the retention, when the button 22 is released, they could fall free of the	1 constricted fashion? 2 MR. HAMILTON: Objection. Vague. 3 A. Yes. 4 Q. And in that circumstance, if we did not 5 have the retention features 140, do you still 6 believe there would be enough slack in the 7 filament for the buttons to move past the end of 8 the housing, such that they would fall out of the 9 housing? 10 MR. HAMILTON: Objection. Vague. 11 Incomplete hypothetical. 12 A. Put another way, one of them could fall 13 out. Yes. 14 Q. And is it your opinion that the spring 15 would not hold or would not be sufficient to hold 16 the button within the housing in that 17 circumstance? 18 MR. HAMILTON: Objection. Vague. 19 Incomplete hypothetical. 20 A. Yeah. It's really not something I 21 reviewed. I think my only comment is what I said 22 earlier, that without the retention, one of them

Page 118 1 could, in fact, escape. 2 Q. Are there situations where the 3 retention feature is removed and the buttons do 4 not escape from the housing? 5 MR. HAMILTON: Objection. Vague. 6 Incomplete hypothetical. Beyond the scope of 7 Direct. Calls for speculation. 8 A. Theoretically, if it was positioned 9 perfectly horizontally so that gravity was 10 exactly equal in both ends, theoretically, the 11 actuators could stay put. 12 But once moved, it's unlikely they would 13 stay put. 14 Q. Is there a way you could envision 15 modifying the filament so that the buttons would 16 stay within the housing if the retention feature 17 were removed? 18 MR. HAMILTON: Objection. Vague. 19 Beyond the scope of his declaration. 20 A. Yeah. I haven't considered that. I'd 21 have to separately really analyze that. 22 Q. Did you consider whether there were any	Page 120 1 features were removed? 2 MR. HAMILTON: Objection. Vague. 3 A. Not that I recall. 4 Q. Is there any discussion, that you 5 recall in the '384 patent, about how the buttons 6 would fall out of the housing if the retention 7 features were removed? 8 MR. HAMILTON: Same objection. 9 A. Not that I recall. 10 MR. STOWELL: Okay. Why don't we take 11 a short break here for me to look at my notes, 12 but we might be close to wrapping up. 13 MR. HAMILTON: All right. 14 THE VIDEOGRAPHER: The time is now 15 12:21, and we are off the record. 16 (A recess was taken.) 17 THE VIDEOGRAPHER: The time is now 18 12:28 and we are on the record. 19 BY MR. STOWELL: 20 Q. Dr. Zalesky, did you talk to anybody 21 about your testimony during the break? 22 A. No.
Page 119 1 modifications that could be made to the spring or 2 the tubular member to keep the buttons within the 3 housing when the retention features is removed? 4 MR. HAMILTON: Objection. Vague. 5 Beyond the scope of his declaration. 6 A. I didn't consider that scenario. 7 Q. So when I asked you if the retention 8 features were removed if the device would still 9 work, you said "sort of." 10 Are there situations where you believe the 11 device would continue to function well enough to 12 be used? 13 MR. HAMILTON: Objection. Asked and 14 answered. Vague. Beyond the scope of his 15 declaration. 16 A. The physician or an assistant would 17 have to keep his fingers pressed on the actuators 18 for it to continue to function without the 19 retention. 20 Q. Based on your review of the '384 21 patent, is there any disclosure in the '384 22 patent about what would happen if the retention	Page 121 1 Q. Did you review any documents? 2 A. No. 3 Q. We were talking, before we left, about 4 the retention features in Figure 2. 5 When you rendered your opinions regarding 6 the validity of the '384 patent, did you treat 7 the retention features pictured in Figure 2 as a 8 mandatory feature of the hemostasis valve? 9 MR. HAMILTON: Objection. Vague. 10 A. I assumed it was integral to the 11 invention. 12 Q. Okay. And when you reached your 13 opinions that are expressed in your declaration 14 regarding the '384 patent, did you also consider 15 how your opinions would be impacted if the 16 retention features were optional? 17 MR. HAMILTON: Objection. Beyond the 18 scope of his declaration. Vague. 19 A. I did not consider that possibility. 20 MR. STOWELL: I have no further 21 questions for the witness. 22 MR. HAMILTON: I have no questions.

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1 Thanks.	1 Case: Imperative Care, Inc. vs Inari Medical Inc.
2 THE VIDEOGRAPHER: All right. The time	2 Witness Name: Paul Zalesky, Ph.D.
3 is now 12:30, and we are off the record.	3 Deposition Date: 08/21/2026
4 COURT REPORTER: Can I get the orders?	4
5 For you I have realtime, rough, and four-day	5
6 expedite; is that right?	6 Please be advised that the transcript in the above
7 MR. STOWELL: Yes.	7 referenced matter is now complete and ready for signature.
8 COURT REPORTER: For you, I have	8 The deponent may come to this office to sign the transcript,
9 realtime. And would you like expedite?	9 a copy may be purchased for the witness to review and sign,
10 MR. HAMILTON: Just regular.	10 or the deponent and/or counsel may waive the option of
11 COURT REPORTER: Would you like a	11 signing. Please advise us of the option selected.
12 rough?	12 Please forward the errata sheet and the original signed
13 MR. HAMILTON: No.	13 signature page to counsel noticing the deposition, noting the
14 (Deposition concluded at 12:32 p.m.)	14 applicable time period allowed for such by the governing
15	15 Rules of Procedure. If you have any questions, please do
16	16 not hesitate to call our office at (202)-232-0646.
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2 I, Janet McHugh, Registered Merit Reporter and	1730 M Street, NW, Suite 812
3 Notary Public within and for the Commonwealth of	2 Washington, D.C. 20036
4 Massachusetts do hereby certify:	(202) 232-0646
5 That PAUL ZALESKY, Ph.D., the witness whose	3
6 deposition is hereinbefore set forth, was duly sworn	4 SIGNATURE PAGE
7 by me before the commencement of such deposition and	5 Case: Imperative Care, Inc. vs Inari Medical Inc.
8 that such deposition was taken before me and is a	6 Witness Name: Paul Zalesky, Ph.D.
9 true record of the testimony given by such	7 Deposition Date: 08/21/2026
10 witness.	8 I do hereby acknowledge that I have read
11	9 and examined the foregoing pages
12 I further certify that the adverse party, Inari	10 of the transcript of my deposition and that:
13 Medical, was represented by counsel at the	11 (Check appropriate box):
14 deposition.	12 () The same is a true, correct and
15 I further certify that the deposition of PAUL	13 complete transcription of the answers given by
16 ZALESKY, Ph.D. occurred at the Boston Marriott	14 me to the questions therein recorded.
17 Long Wharf, 296 State Street, Boston, MA, on Friday,	15 () Except for the changes noted in the
18 August 21, 2026, commencing at 9:11 a.m. to 12:32	16 attached Errata Sheet, the same is a true,
19 p.m.	17 correct and complete transcription of the
20 I further certify that I am not related to	18 answers given by me to the questions therein
21 any of the parties to this action by blood or	19 recorded.
22 marriage, I am not employed by or an attorney to any	20 _____
	DATE WITNESS SIGNATURE
	21 _____
	DATE NOTARY
	22 _____

Errata Sheet

1
2 NAME OF CASE: Imperative Care, Inc. vs Inari Medical Inc.
3 DATE OF DEPOSITION: 08/21/2026
4 NAME OF WITNESS: Paul Zalesky, Ph.D.
5 Reason Codes: 1. To clarify the record.
6 2. To conform to the facts.
7 3. To correct transcription errors.
8 Page ____ Line ____ Reason ____
9 From ____ to ____
10 Page ____ Line ____ Reason ____
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21
22 PAUL ZALESKY, PH.D.

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