

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

3 HUHTAMAKI FLEXIBLE PACKAGING
4 GERMANY GMBH & CO. KG,

5 Petitioner,

6 vs. Case No. PGR2023-00008
7 U.S. Patent No. 11,260,624 B2
8 ADAPA FLEXIBLES DENMARK
9 SLAGELSE A/S,

10 Patent Owner.

11 THE DEPOSITION OF DR. STEPHEN MCCARTHY
12 APRIL 5, 2024

13 Volume 3

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20 Reported by:

21 PATRICIA A. NILSEN, RMR, CRR, CRC

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1 APPEARANCES (via Zoom)

2

For the Petitioner:

3

MARK A. KILGORE

4

SAM A. RAQUE

Attorneys at Law

5

PATTERSON INTELLECTUAL PROPERTY LAW, P.C.

Roundabout Plaza | 1600 Division Street, Suite 500

6

Nashville, TN 37203

615.242.2400

7

mak@iplawgroup.com

sar@iplawgroup.com

8

For the Patent Owner:

9

TIMOTHY P. GETZOFF

10

STEVEN A. AVENA

Attorney at Law

11

HOLLAND & HART LLP

1800 Broadway, Suite 300

12

Boulder, CO 80302

303.473.2734

13

tgetzoff@hollandhart.com

saavena@hollandhart.com

14

Stenographically Reported By:

15

PATRICIA A. NILSEN, RMR, CRR, CRC

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1	INDEX		
2			
3	WITNESS:		PAGE
4	DR. STEPHEN MCCARTHY		
5	Examination		
6	By Mr. Kilgore		4
7	EXHIBITS		
8	NUMBER	DESCRIPTION	PAGE
9	I N D E X		
10	EXHIBIT 2022	Third declaration of Dr. Stephen McCarthy	8
11	EXHIBIT 2019	Declaration of Manuella Herb	8
12	EXHIBIT 2003	(PREVIOUSLY MARKED) United States	4
13		Patent Application, Pub. No. 2015/0225151	
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

1 * * *

2 STEPHEN MCCARTHY, PHD,
3 was called as a witness, and after having been duly
4 sworn, testified as follows:

5 EXAMINATION

6 BY MR. KILGORE:

7 Q. All right, Dr. McCarthy. Thank you again
8 for being here. You may recall, my name is Mark
9 Kilgore. I'll be taking your deposition today.

10 This is your third deposition in this
11 proceeding, correct?

12 A. That is correct.

13 Q. All right. So you're probably aware of
14 how we'll kind of go through things today, but just as a
15 reminder, I'll go over some of the ground rules so that
16 we're all on the same page. Okay?

17 A. Yep.

18 Q. We're taking this deposition virtually,
19 but it will work much the same as if we were all in the
20 same room together. I'll ask you a question, and then
21 you'll provide your response.

22 Our court reporter is here. She'll be
23 taking down everything we say, so we should refrain from
24 talking over each other, okay? Is that okay?

25 A. That is okay.

1 Q. All right. If you'll let me ask my
2 complete question, then I'll let you answer, and I'll
3 let you finish your answer before asking my next
4 question. Okay?

5 A. That is okay.

6 Q. And when answering, as best you can,
7 please always provide a verbal answer. Head nods or
8 nonverbal cues are difficult to take down for the court
9 reporter. So verbal answers will always be appreciated
10 by both of us. Okay?

11 A. That is okay.

12 Q. All right. If I ask a question, and you
13 don't understand it, or if it was poorly worded on my
14 part, please ask for me to clarify the question. I want
15 to make -- I want to make sure that you understand what
16 I'm asking, and that you're -- you are answering the
17 question I'm asking.

18 If you don't understand what I'm asking,
19 I'll try and find a better way to ask it, or I'll try
20 and figure out what's going on with our communication.
21 Okay?

22 A. That is okay.

23 Q. All right. If at any time you need a
24 break, just please let me or your attorney know. I
25 think, you know, as we said, this should be a fairly

1 short deposition. But still, if you need a break at
2 some point, let one of us know.

3 I will say that if there is a question
4 pending, please answer that question, and then we can
5 take a break. Okay?

6 A. That is okay.

7 Q. All right. So are you prepared today to
8 give your complete, accurate and truthful answers here?

9 A. Yes.

10 Q. All right. Are you taking any
11 medications, or have you been sick at all and taking
12 anything that would make it difficult to understand my
13 questions and provide your answers?

14 A. No.

15 Q. All right. If at any point we have
16 technical difficulties, just let me know. And we can
17 get that sorted out either on the record or off the
18 record. Okay?

19 A. That is okay.

20 Q. All right. So I believe -- are you
21 located in Denver, Colorado, again today?

22 A. That is correct.

23 Q. All right. And could you tell me what
24 documents you may have in front of you, or with you?

25 A. I have a copy of my third declaration.

1 Q. Okay. Any notes on it?

2 A. No.

3 Q. Okay.

4 A. And then I have a sticky with some
5 corrections.

6 Q. Okay. And can you tell me everyone that
7 is in the room with you?

8 A. So there is just Tim and Steve are.

9 Q. Okay.

10 A. My friends.

11 Q. Yeah, Tim Getzoff and Steve Avena. Fine.

12 All right. So let me share my screen.

13 All right, Dr. McCarthy, can you see
14 that?

15 A. Yes.

16 Q. It is your third declaration of Stephen
17 McCarthy, Ph.D.? Yes, sir?

18 A. Yes.

19 Q. And I'm going to scroll all the way to
20 the end here.

21 On page 53, it says "Executed on this
22 25th day of March 2024." Correct?

23 A. That is correct.

24 Q. And that is your signature there?

25 A. That is correct.

1 Q. Okay. And this is the same document that
2 you have in front of you?

3 A. That is correct.

4 Q. Okay. Give me one second.

5 All right. So I've also pulled up -- so
6 your third expert declaration is Exhibit -- I'm not sure
7 if it's on the -- Exhibit 2022. So I may refer to it
8 either as your third declaration or Exhibit 2022.

9 (EXHIBIT 2022, third declaration of
10 Dr. Stephen McCarthy, was marked for
11 identification and attached hereto.)

12 BY MR. KILGORE:

13 Q. Okay?

14 A. That is okay.

15 (EXHIBIT 2019, declaration of Manuella
16 Herb, was marked for identification and
17 attached hereto.)

18 BY MR. KILGORE:

19 Q. All right. And then we also have
20 Exhibit 2019, which is a declaration of Manuella Herb.

21 Are you familiar with this document?

22 A. Yes, I am.

23 Q. Okay. And did you use this document in
24 forming your opinions for your third expert declaration?

25 A. I believe so.

1 Q. Okay. So I'm going to go down to
2 paragraph 10. You can still see that on the screen,
3 correct?

4 A. Yeah.

5 Q. Okay. So this is paragraph 10 of
6 Exhibit --

7 MR. GETZOFF: Pardon me. Can you make
8 that just a tad bigger? Is that possible?

9 MR. KILGORE: Absolutely. How about
10 that, is that good? Nope, too big?

11 MR. GETZOFF: Next.

12 MR. KILGORE: All right.

13 BY MR. KILGORE:

14 Q. So this is paragraph 10 of Exhibit 2019
15 which is the Herb declaration. And here in the middle
16 of the paragraph at the end of the page I've
17 highlighted, the laminate structure that they've used
18 for laboratory testing.

19 Do you see that?

20 A. I do see that.

21 Q. Okay. And so this laminate structure has
22 a paper layer, is that correct?

23 A. That's what it says.

24 Q. Okay. And then there is an adhesive
25 layer, correct?

1 A. That is correct.

2 Q. All right. And then a polyethylene
3 terephthalate, or PET, layer, correct?

4 A. Yes.

5 Q. I also understand that could also be
6 OPET, or "OPET" as well?

7 A. It would be OPET if it was oriented.

8 Q. Okay. Got you.

9 Then after that we have another adhesive
10 layer, correct?

11 A. That's what it says.

12 Q. And then an aluminum layer, correct?

13 A. That's what it says.

14 Q. All right. Ethylene acrylic acid
15 copolymer, correct?

16 A. That's what it says.

17 Q. All right. And that ethylene acrylic
18 acid could also be referred to as EAA, is that correct?

19 A. That is correct.

20 Q. All right. Then we have an LDPE layer,
21 correct?

22 A. That's what it says.

23 Q. All right. "LDPE" being low-density
24 polyethylene, is that correct?

25 A. That is correct.

1 Q. Okay. And that is a part of the
2 polyolefin family, is that right?

3 A. That is correct.

4 Q. And then the final layer is COC, is that
5 correct?

6 A. That's what it says.

7 Q. And that would be cyclic olefin
8 copolymer?

9 A. That is correct.

10 Q. Okay. And so for the COC layer, do you
11 know what type of COC that they -- that they used in the
12 Herb declaration?

13 A. I can -- I don't know exactly what they
14 used, but I would imagine it would be something to copy
15 the example 5 in Riis.

16 Q. Okay. And are you -- are you aware that
17 this declaration was submitted in a proceeding where
18 Riis was not being used by the examiner?

19 A. It is my understanding that Riis
20 example 5 and Osborn example 5 are identical.

21 Q. Okay.

22 A. And that this would -- also could be
23 referred to as Osborn example 5.

24 Q. Okay. Thank you for that clarification.

25 A. No problem.

1 Q. Is the -- is the laminate structure that
2 we just went through and is provided in paragraph 10 the
3 same laminate of example 5, layer for layer?

4 A. Do you want me to check, or ...

5 Q. If -- yeah, if you don't know off the top
6 of your head, you can check.

7 A. Okay.

8 Q. Do you have Riis or Osborn with you, or
9 do I need to pull it up on the screen? Are you --

10 A. I have the table from Table 1 in my
11 report.

12 Q. Okay.

13 A. Which has the structure of Osborn,
14 example 5.

15 Q. Okay.

16 A. There appears to be an LDPE layer missing
17 on the exterior side. But other than that, it appears
18 identical.

19 Q. Okay. So what -- what is the paper layer
20 in Osborn?

21 A. I'd have to refer to Osborn, if you have
22 a copy.

23 Q. Okay. So I've pulled up -- it was easier
24 for me to get to Riis, so I -- I think you said Riis and
25 Osborn were the same. So let me make this a little bit

1 bigger.

2 And here we have example 5, start --
3 starting at the bottom of page 45 and then going on to
4 page -- or annotated page 45, going on to page 46.

5 So according to example 5, the first
6 layer is OPET. So is that the same as the paper layer
7 of the Herb declaration?

8 A. I don't believe so.

9 Q. Okay. And so we have -- in example 5 we
10 have OPET, and then next we have primer. If we go back
11 to the Herb declaration, which layer -- could you tell
12 me which layer would be the primer layer in
13 paragraph 10?

14 A. Can -- can you go back to Riis?

15 Q. Yes, sir.

16 A. So in the -- can you go back to the -- so
17 I guess I would like to look at Osborn and see whether
18 Osborn has --

19 Q. Okay. All right. Let me get -- give me
20 one second. Let me pull up Osborn.

21 A. Yeah.

22 Q. All right. So this says Osborn -- United
23 States Patent Application Publication, Osborn, Pub. No.
24 2015/0225151. This is Exhibit 2003. So Patent Owner's
25 exhibit.

1 (EXHIBIT 2003, (PREVIOUSLY MARKED) United
2 States Patent Application, Pub. No.
3 2015/0225151, was identified and attached
4 hereto.)

5 BY MR. KILGORE:

6 Q. Do you want me to scroll down to where
7 example 5 is?

8 A. Right.

9 Q. So it starts down here at the bottom of
10 Column 1 on 10. I think we want the top of Column 2 on
11 page 10.

12 A. So it appears as though there's a
13 different exterior side to the foil.

14 Q. Are you meaning a difference between
15 Osborn and Riis?

16 A. No. Between --

17 Q. Okay.

18 A. Between Osborn/Riis and Herb.

19 Q. Okay. Understood.

20 So there are -- so there are some
21 differences between the laminate provided in the Herb
22 declaration versus what's provided in Riis or -- and/or
23 Osborn?

24 A. Yeah. Can you go back to Herb?

25 Q. Sure.

1 A. Yeah, there appear to be some differences
2 up until the aluminum layer, and then on the interior
3 side, it appears to be the same; you know, the aluminum
4 ethylene acrylic acid copolymer LDPE and COC.

5 Q. Okay. And as we said earlier, you're not
6 sure what COC was used in the Herb declaration, correct?

7 MR. GETZOFF: Objection. Restates the
8 testimony.

9 A. I said that I would imagine it was used
10 to reproduce Osborn/Riis, example 5.

11 BY MR. KILGORE:

12 Q. Okay. So could you tell me what COC was
13 used?

14 A. I -- I believe it is listed in the Riis
15 patent.

16 Q. So Riis provides what COC they use, but
17 does the Herb declaration provide what COC they used?

18 A. So again, I would assume that it would be
19 that COC.

20 Q. Okay. And what is the loading of -- of
21 the COC layer in the Herb declaration?

22 A. Well, if it was reproducing the Riis, it
23 would be, you know, the .43 --

24 Q. Okay.

25 A. -- mils.

1 **Q. Do you know if they are reproducing the**
2 **film of Riis?**

3 A. Yeah, it says in paragraph 6 that they're
4 reproducing example 5. OPET primer. And then the
5 aluminum foil/EAA/LDPE/COC.

6 MR. GETZOFF: You need to say that again,
7 slower.

8 A. Oh. It says in a -- in paragraph 6 of
9 the Herb declaration, it says that it would be
10 EAA/LDPE/COC on the product-contacting side of the
11 aluminum foil, and therefore to reproduce that, you
12 would use the same aluminum foil/EAA/LDPE and COC as
13 disclosed in Riis/Osborn.

14 **Q. Okay. And paragraph 6, can you point me**
15 **to where they say they are reproducing that film that**
16 **was used for laboratory testing?**

17 A. So in paragraph 7, it says the invention
18 claimed in this application is directed to a specific
19 arrangement of layers, and the order of these layers
20 have been found -- that have been found to produce a
21 superior result, and the superior result is with
22 relation to the example 5 in paragraph 6.

23 **Q. So how does that dictate that the**
24 **laminate structure that they tested is the same as**
25 **Osborn/Riis example 5?**

1 A. So when -- in order to compare whether
2 the result was superior, you would want to measure the
3 results of example 5 and compare them to your results.

4 **Q. Is it possible that the loading ranges**
5 **were altered to produce a superior result?**

6 A. The loading ranges in paragraph 10?

7 **Q. Yes, sir.**

8 A. Were altered to produce a result where
9 .5 newtons is exaggerated. Is that what you were
10 asking?

11 **Q. No. You said -- you pointed to claim --**
12 **you pointed to paragraph 7 --**

13 A. Right.

14 **Q. -- saying that this paragraph indicates**
15 **that the laminate film used for laboratory testing was**
16 **the same as the film of example 5. So my question was,**
17 **could the laminate film of paragraph 10 -- or let me**
18 **rephrase that.**

19 **Could the laminate film that they used**
20 **for laboratory testing have altered the loading range --**
21 **loading ranges, excuse me, to produce the superior**
22 **result stated in paragraph 7?**

23 MR. GETZOFF: Objection to form.

24 A. So the -- the question is -- so the
25 questioning, as I understand it, is whether paragraph 10

1 represents example 5. And I believe that it does
2 represent example 5.

3 BY MR. KILGORE:

4 Q. And what's your basis for that?

5 A. Because I believe that's what is implied
6 here. And that's how I would do it.

7 Q. Okay. Did you see any of the actual
8 testing data that was used to produce this Herb
9 declaration?

10 A. I've seen the .5 newton, or
11 15 millimeters.

12 Q. Did you see what the -- did you see
13 anything related to the actual loading ranges of the
14 laminate structure that was used for the laboratory
15 testing?

16 A. Again, I believe that it would be -- the
17 loading ranges would be similar to the ones for
18 example 5 in Osborn/Riis.

19 Q. I understand that may be what you
20 believe.

21 What I'm asking is have you actually
22 seen or have firsthand knowledge of what the
23 loading ranges are of the laminate that was used
24 for laboratory testing?

25 A. I don't believe so.

1 Q. Okay. Could the COC loading range of the
2 laminate structure in 10 be different from example 5 of
3 Riis?

4 A. I do not believe so.

5 Q. What's your basis for saying that it
6 could not?

7 A. Just that the -- the results are to
8 indicate a baseline for the performance of example 5 in
9 Riis/Osborn.

10 Q. Okay. So what is the loading of the LDPE
11 layer of the laminate structure in paragraph 10?

12 A. I believe it would be the .65-mil LDPE.

13 Q. Okay.

14 A. The bulk layer in Riis/Osborn.

15 Q. Is that loading range stated anywhere in
16 the Herb declaration?

17 A. In paragraph 6.

18 Q. Can you point me to where it says the
19 .65-mil thickness?

20 A. It is both in Osborn and Riis.

21 Q. So the thicknesses are stated in Osborn
22 and Riis. My question was, is the thickness for the
23 loading stated in the Herb declaration itself?

24 A. Again, I believe it's implied.

25 Q. And what about the loading of the EAA

1 layer?

2 A. Again, it would be the same as the
3 example 5 of the Osborn/Riis.

4 Q. So looking at the laminate structure of
5 paragraph 10, is the LDPE a bulk layer or tie layer?

6 A. So Riis and Osborn define it as a bulk
7 layer. In -- again, the .65-mil LDPE layer between the
8 COC and the EAA layer is defined in both Riis and Osborn
9 as a bulk layer.

10 Q. So you're using Riis and Osborn to define
11 the LDPE layer of the Herb declaration?

12 A. Again, I believe that example -- that
13 paragraph 6 refers to example 5 in Osborn/Riis. So it
14 would be appropriate to use the definitions in Osborn or
15 Riis for what that structure is.

16 Can we take a break?

17 Q. Sure.

18 A. Okay.

19 (Recess)

20 BY MR. KILGORE:

21 Q. Okay, Dr. McCarthy, did you discuss
22 anything with counsel on the break?

23 A. No. I went to the bathroom.

24 Q. All right. So before we left off, I had
25 asked if you were using Osborn and Riis to define the

1 LDPE layer of the Herb declaration. And you said it
2 would be appropriate to use the definitions in Osborn or
3 Riis for what that structure is.

4 A. Correct. Yeah, and again, that would be
5 referring to the -- to the product-contacting side of
6 the aluminum foil; you know, the important side.

7 Q. Okay. So if you -- if you used the
8 definitions and disclosures of the '624 patent, would
9 LDPE be a tie layer or bulk layer?

10 MR. GETZOFF: Objection to form.

11 A. So you're saying if -- I guess I'm not
12 sure. I'm not sure what -- what you're asking.

13 BY MR. KILGORE:

14 Q. Sir, when I asked you earlier whether
15 LDPE was a tie layer or bulk layer, you used the
16 definitions in Riis and Osborn.

17 What I'm asking you now is for the
18 LDPE layer of paragraph 10 and the Herb
19 declaration, if you applied the disclosures and
20 definitions of the '624 patent, is the LDPE layer a
21 tie layer or bulk layer?

22 MR. GETZOFF: Objection to form, and
23 outside the scope of the deposition.

24 You can answer.

25 A. I don't think the '624 patent has a

1 .65-mil -- I guess I'm not sure.

2 BY MR. KILGORE:

3 Q. So you can't determine, under the '624
4 disclosure, whether the LDPE layer of paragraph 10 of
5 the Herb declaration is a bulk layer or a tie layer,
6 correct?

7 MR. GETZOFF: Objection to form. Outside
8 the scope.

9 A. Is that in my -- my report?

10 BY MR. KILGORE:

11 Q. Well, I'm just going to ask my question
12 again: Can you determine under the '624 disclosure
13 whether the LDPE layer of paragraph 10 of the Herb
14 declaration is a bulk layer or a tie layer?

15 MR. GETZOFF: Objection to form. Outside
16 the scope.

17 A. So I believe the LDPE layer in
18 paragraph 10 is a bulk layer because it was used to copy
19 the disclosure of Riis/Osborn, which define it as a bulk
20 layer.

21 BY MR. KILGORE:

22 Q. Okay. So if I just create the laminate
23 structure of paragraph 10 without any reference to Riis
24 or Osborn or the '624 patent -- I just simply create
25 that laminate -- can you tell me, is the LDPE layer a

1 tie layer or a bulk layer?

2 MR. GETZOFF: Mark, can you put
3 paragraph 10 back up?

4 MR. KILGORE: Yes. I'm sorry, yes.
5 Thank you, Tim. I forgot that I had not
6 shared the screen.

7 BY MR. KILGORE:

8 Q. Okay. So let me re-ask that question now
9 that -- can you see the screen now?

10 A. Yes.

11 Q. Okay. So if I just create the laminate
12 structure of paragraph 10 without any reference to Riis
13 or Osborn or the '624 patent -- I just simply create
14 that laminate -- can you tell me, is the LDPE layer a
15 tie layer or a bulk layer?

16 A. I would -- without any reference, I would
17 conclude it would be a bulk layer because of the
18 adhesive strength reported in paragraph 10.

19 Q. So -- so based on that, in order to
20 determine a bulk layer/tie layer, you need to understand
21 the adhesive strength? Is that your -- is that what
22 you're saying?

23 A. That would be one of the definitions of a
24 tie layer versus a bulk layer.

25 Q. Okay. What -- what quantity of adhesion

1 would be needed in order to go from a bulk layer to a
2 tie layer?

3 MR. GETZOFF: Objection. Outside the
4 scope.

5 A. I'm not sure.

6 BY MR. KILGORE:

7 Q. Okay. What if it was ten newtons per
8 15 millimeters? Would that be a tie layer?

9 A. Possibly.

10 MR. GETZOFF: Same objection.

11 BY MR. KILGORE:

12 Q. What about five newtons per
13 15 millimeters? Possibly a tie layer?

14 MR. GETZOFF: Objection. Outside the
15 scope.

16 A. It depends on the application. It's
17 possible.

18 BY MR. KILGORE:

19 Q. So without knowing the strength per
20 length, would you be able to determine whether LDPE is a
21 tie layer or bulk layer?

22 MR. GETZOFF: Objection. Outside the
23 scope.

24 A. I would need to know the context, you
25 know, the application, etc.

1 BY MR. KILGORE:

2 Q. Okay. So -- so again, if I create the
3 laminate structure of paragraph 10, again, without any
4 reference to Riis or Osborn and '624 patent -- just
5 simply create the laminate -- can you tell me if the EAA
6 layer is a tie layer or bulk layer?

7 A. So you're creating the EAA layer
8 according to Riis/Osborn?

9 Q. I'm creating the EAA layer according to
10 what is provided in paragraph 10 of the Herb
11 declaration.

12 A. And as such, I have concluded that it is
13 a duplicate of example 5 of Riis/Osborn.

14 Q. So if I create a duplicate film of Riis
15 and Osborn without any reference to Riis or Osborn or
16 the '624 patent, is the EAA layer a tie layer or a
17 bulk -- excuse me, bulk layer?

18 MR. GETZOFF: Object -- objection to
19 form, and outside the scope.

20 A. I would probably conclude that it was a
21 tie layer because it's multifunctional, and because of
22 the -- you know, the thickness of .17 mils, and it being
23 between, you know, the LDPE and the aluminum.

24 BY MR. KILGORE:

25 Q. Okay. So -- so in the Herb declaration,

1 they substitute metallocene LLDPE for the LDPE layer and
2 the laminate structure. Is that your understanding?

3 A. I'm -- I believe that's in the next page.

4 Q. Okay. So if we go to paragraph 11, it
5 says in the middle of the paragraph, "The modified
6 laminate was the same as the laminate described above in
7 11" -- I think that's a mistake. I think what they're
8 referring to is paragraph 10 -- "with the only exception
9 that the layer of regular LDPE was replaced with a C8
10 metallocene LLDPE layer of the same weight per unit area
11 as that of the regular LDPE layer."

12 Do you see that?

13 A. Yes.

14 Q. Okay. So in the modified laminate they
15 just simply replaced the LDPE layer with a metallocene
16 LLDPE layer, and I understand it has the same loading.
17 Is that correct?

18 A. That is correct.

19 Q. So is the metallocene LLDPE layer a tie
20 layer or a bulk layer?

21 A. A bulk layer.

22 MR. KILGORE: Tim, we'll take a quick
23 five-minute break. I'm going to look to see
24 if there's anything else we want to touch on,
25 all right?

1 MR. GETZOFF: Sounds good. Thanks.

2 MR. KILGORE: We'll go off the record.

3 (Recess)

4 MR. KILGORE: Tim, Dr. McCarthy, we have
5 no further questions.

6 MR. GETZOFF: Neither do we.

7 MR. KILGORE: All right.

8 MR. GETZOFF: Patricia, we will read and
9 sign. Although that's kind of moot under our
10 time constraints.

11 MR. KILGORE: I know, yeah.

12 MR. GETZOFF: But I'll make the request
13 anyways.

14 AND FURTHER DEPONENT SAITH NOT

15 (Signature is reserved.)

16 THE DEPOSITION CONCLUDED AT 10:59 A.M.

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1 CERTIFICATE OF REPORTER

2 I, the undersigned, a Registered Merit
3 Reporter, do hereby certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth; that
6 any witnesses in the foregoing proceedings, prior to
7 testifying, were administered an oath; that a record of
8 the proceedings was made by me using machine shorthand
9 which was thereafter transcribed under my direction;
10 that the foregoing transcript is a true record of the
11 testimony given.

12 That before the completion of the
13 deposition, review of the transcript [X]was []
14 was not requested. If requested, any changes made
15 by the deponent (and provided to the reporter)
16 during the period allowed are appended hereto.

17 I further certify that I am neither
18 financially interested in the action nor a relative
19 or employee of any attorney or any party to this
20 action.

21 IN WITNESS WHEREOF, I have this date
22 subscribed my name.

23 Dated: April 8, 2024



24 PATRICIA NILSEN, RMR, CRR

25

1 DECLARATION OF PENALTY OF PERJURY

2

3 I, STEPHEN MCCARTHY, do hereby certify under
4 penalty of perjury that I have read the foregoing
5 transcript of my deposition taken on April 5, 2024; that
6 I have made such corrections as appear noted herein;
7 that my testimony as contained herein, as corrected, is
8 true and correct.

9

10

11 DATED this ____ day of _____, 20____, at

12

_____, _____.

13

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STEPHEN MCCARTHY

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24	SIGNATURE: _____ DATE: _____
25	STEPHEN MCCARTHY

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21	_____
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25	STEPHEN MCCARTHY

Exhibits	2	6	adhesive
McCarthyS 2003 3:12 13:24 14:1	2 14:10 2003 13:24 14:1	6 16:3, 8, 14, 22 19:17 20:13	9:24 10:9 23:18, 21
McCarthyS 2019 3:11 8:15, 20 9:14	2015/0225151 13:24 14:3	624 21:8, 20, 25 22:3, 12, 24 23:13 25:4, 16	altered 17:5, 8, 20
McCarthyS 2022 3:10 8:7, 8, 9	2019 8:15, 20 9:14 2022 8:7, 8, 9	65-mil 19:12, 19 20:7 22:1	aluminum 10:12 15:2, 3 16:5, 11, 12 21:6 25:23
1	2024 7:22 25th 7:22	7	and/or 14:22
1 12:10 14:10	4	7 16:17 17:12, 22	annotated 13:4
10 9:2, 5, 14 12:2 13:13 14:10, 11 17:6, 17, 25 19:2, 11 20:5 21:18 22:4, 13, 18, 23 23:3, 12, 18 25:3, 10 26:8	43 15:23 45 13:3, 4 46 13:4	A	answering 5:6, 16
10:59 27:16	5 11:15, 20, 23 12:3, 14 13:2, 5, 9 14:7 15:10 16:4, 22, 25 17:3, 9, 16 18:1, 2, 10, 18 19:2, 8 20:3, 13 25:13	A.M. 27:16 Absolutely 9:9 accurate 6:8 acid 10:14, 18 15:4 acrylic 10:14, 17 15:4 actual 18:7, 13 adhesion 23:25	answers 5:9 6:8, 13 appears 12:16, 17 14:12 15:3
11 26:4, 7	53 7:21		application 13:23 14:2 16:18 24:16, 25
15 18:11 24:8, 13			applied 21:19
17 25:22			appreciated 5:9
			area 26:10
			arrangement 16:19
			assume 15:18
			attached

8:11, 17 14:3 attorney 5:24 Avena 7:11 aware 4:13 11:16	22:5, 14, 18, 19 23:1, 15, 17, 20, 24 24:1, 21 25:6, 17 26:20, 21	conclude 23:17 25:20 concluded 25:12 27:16 constraints 27:10 context 24:24 copolymer 10:15 11:8 15:4 copy 6:25 11:14 12:22 22:18 correct 4:11, 12 6:22 7:22, 23, 25 8:3 9:3, 22, 25 10:1, 3, 10, 12, 15, 18, 19, 21, 24, 25 11:3, 5, 9 15:6 21:4 22:6 26:17, 18 corrections 7:5 counsel 20:22 court 4:22 5:8	create 22:22, 24 23:11, 13 25:2, 5, 14 creating 25:7, 9 cues 5:8 cyclic 11:7
<hr/> B <hr/>	<hr/> C <hr/>		<hr/> D <hr/>
back 13:10, 14, 16 14:24 23:3 based 23:19 baseline 19:8 basis 18:4 19:5 bathroom 20:23 big 9:10 bigger 9:8 13:1 bit 12:25 bottom 13:3 14:9 break 5:24 6:1, 5 20:16, 22 26:23 bulk 19:14 20:5, 6, 9 21:9, 15, 21	c8 26:9 called 4:3 check 12:4, 6 claim 17:11 claimed 16:18 clarification 11:24 clarify 5:14 coc 11:4, 10, 11 15:4, 6, 12, 16, 17, 19, 21 16:12 19:1 20:8 Colorado 6:21 Column 14:10 communication 5:20 compare 17:1, 3 complete 5:2 6:8		data 18:8 day 7:22 declaration 6:25 7:16 8:6, 8, 9, 15, 20, 24 9:15 11:12, 17 13:7, 11 14:22 15:6, 17, 21 16:9 18:9 19:16, 23 20:11 21:1, 19 22:5, 14 25:11, 25 define 20:6, 10, 25 22:19 defined 20:8 definitions 20:14 21:2, 8, 16,

20 23:23	discuss	26:8	five-minute
Denver 6:21	20:21	excuse 17:21	26:23
depends	document	25:17	foil 14:13
24:16	8:1, 21, 23	Executed	16:11 21:6
DEPONENT	documents	7:21	foil/eaal/dpe
27:14	6:24	exhibit 8:6,	16:12
deposition	duly 4:3	7, 8, 9, 15,	foil/eaal/dpe/
4:9, 10, 18	duplicate	20 9:6, 14	coc 16:5
6:1 21:23	25:13, 14	13:24, 25	forgot 23:5
27:16		14:1	form 17:23
determine	<hr/> E <hr/>	expert 8:6,	21:10, 22
22:3, 12	EAA 10:18	24	22:7, 15
23:20	19:25 20:8	exterior	25:19
24:20	25:5, 7, 9,	12:17	forming 8:24
dictate	16	14:13	found 16:20
16:23	EAA/LDPE/COC	<hr/> F <hr/>	friends 7:10
difference	16:10	fairly 5:25	front 6:24
14:14	earlier 15:5	familiar	8:2
differences	21:14	8:21	<hr/> G <hr/>
14:21 15:1	easier 12:23	family 11:2	Getzoff 7:11
difficult	end 7:20	figure 5:20	9:7, 11
5:8 6:12	9:16	film 16:2,	15:7 16:6
difficulties	ethylene	15 17:15,	17:23
6:16	10:14, 17	16, 17, 19	21:10, 22
directed	15:4	25:14	22:7, 15
16:18	exaggerated	final 11:4	23:2 24:3,
disclosed	17:9	find 5:19	10, 14, 22
16:13	EXAMINATION	Fine 7:11	25:18
disclosure	4:5	finish 5:3	27:1, 6, 8,
22:4, 12, 19	examiner	firsthand	12
disclosures	11:18	18:22	give 6:8
21:8, 19	exception		8:4 13:19

good 9:10 27:1	identified 14:3	L	8, 13, 21 25:6, 7, 9, 16, 17, 21
ground 4:15	imagine 11:14 15:9	laboratory 9:18 16:16	26:1, 9, 10, 11, 15, 16, 19, 20, 21
guess 13:17 21:11 22:1	implied 18:5 19:24	17:15, 20 18:14, 24	
H	important 21:6	laminate 9:17, 21 12:1, 3 14:21 16:24	layer/tie 23:20
head 5:7 12:6	interior 15:2	17:15, 17, 19 18:14, 23 19:2, 11 20:4 22:22, 25 23:11, 14 25:3, 5 26:2, 6, 14	layers 16:19 LDPE 10:20, 23 12:16 15:4 19:10, 12 20:5, 7, 11 21:1, 9, 15, 18, 20 22:4, 13, 17, 25 23:14 24:20 25:23 26:1, 9, 11, 15
Herb 8:16, 20 9:15 11:12 13:7, 11 14:18, 21, 24 15:6, 17, 21 16:9 18:8 19:16, 23 20:11 21:1, 18 22:5, 13 25:10, 25	invention 16:17	layer 9:22, 25 10:3, 10, 12, 20 11:4, 10 12:3, 16, 19 13:6, 11, 12 15:2, 21 19:11, 14 20:1, 5, 7, 8, 9, 11 21:1, 9, 15, 18, 20, 21 22:4, 5, 13, 14, 17, 18, 20, 25 23:1, 14, 15, 17, 20, 24 24:1, 2,	
hereto 8:11, 17 14:4	Kilgore 4:6, 9 8:12, 18 9:9, 12, 13 14:5 15:11 18:3 20:20 21:13 22:2, 10, 21 23:4, 7 24:6, 11, 18 25:1, 24 26:22 27:2, 4, 7, 11		left 20:24 length 24:20 listed 15:14 LLDPE 26:1, 10, 16, 19
highlighted 9:17	kind 4:14 27:9		loading 15:20 17:4, 6, 20, 21 18:13, 17, 23 19:1, 10, 15, 23, 25
I	knowing 24:19		
identical 11:20 12:18	knowledge 18:22		
identification 8:11, 16			

26:16	millimeters	25:18	
located 6:21	18:11	olefin 11:7	P
low-density	24:8, 13	OPET 10:6, 7	paper 9:22
10:23	mils 15:25	13:6, 10	12:19 13:6
	25:22	16:4	paragraph
M	missing	opinions	9:2, 5, 14,
	12:16	8:24	16 12:2
make 5:15	mistake 26:7	order 16:19	13:13
6:12 9:7	modified	17:1 23:19	16:3, 8, 14,
12:25	26:5, 14	24:1	17, 22
27:12	moot 27:9	oriented	17:6, 12,
Manuella	multifunctiona	10:7	14, 17, 22,
8:15, 20	l 25:21	Osborn	25 19:11,
March 7:22		11:20, 23	17 20:5, 13
Mark 4:8	N	12:8, 13,	21:18
23:2		20, 21, 25	22:4, 13,
marked 8:10,	needed 24:1	13:17, 18,	18, 23
16 14:1	newton 18:10	20, 22, 23	23:3, 12, 18
Mccarthy	newtons 17:9	14:15, 23	25:3, 10
4:2, 7	24:7, 12	19:20, 21	26:4, 5, 8
7:13, 17	nods 5:7	20:6, 8, 10,	Pardon 9:7
8:10 20:21	nonverbal	14, 25	part 5:14
27:4	5:8	21:2, 16	11:1
meaning	notes 7:1	22:24	patent
14:14		23:13	13:23, 24
measure 17:2	O	25:4, 15	14:2 15:15
medications		Osborn/riis	21:8, 20, 25
6:11	Object 25:18	14:18	22:24
metallocene	objection	15:10	23:13
26:1, 10,	15:7 17:23	16:25	25:4, 16
15, 19	21:10, 22	18:18	Patricia
middle 9:15	22:7, 15	20:3, 13	27:8
26:5	24:3, 10,	Owner's	pending 6:4
	14, 22	13:24	performance
			19:8

PET 10:3	provide 4:21		relation
Ph.d. 7:17	5:7 6:13	R	16:22
PHD 4:2	15:17	range 17:20	reminder
point 6:2, 15	provided	19:1, 15	4:15
16:14	12:2	ranges 17:4,	rephrase
19:18	14:21, 22	6, 21	17:18
pointed	25:10	18:13, 17,	replaced
17:11, 12	Pub 13:23	23	26:9, 15
polyethylene	14:2	re-ask 23:8	report 12:11
10:2, 24	Publication	read 27:8	22:9
polyolefin	13:23	recall 4:8	reported
11:2	pull 12:9	Recess 20:19	23:18
poorly 5:13	13:20	27:3	reporter
Possibly	pulled 8:5	record 6:17,	4:22 5:9
24:9, 13	12:23	18 27:2	represent
prepared 6:7	put 23:2	refer 8:7	18:2
PREVIOUSLY		12:21	represents
14:1	Q	reference	18:1
primer	quantity	22:23	reproduce
13:10, 12	23:25	23:12, 16	15:10
16:4	question	25:4, 15	16:11
problem	4:20 5:2,	referred	reproducing
11:25	4, 12, 14, 17	10:18	15:22
proceeding	6:3, 4	11:23	16:1, 4, 15
4:11 11:17	17:16, 24	referring	request
produce	19:22	21:5 26:8	27:12
16:20	22:11 23:8	refers 20:13	reserved
17:5, 8, 21	questioning	refrain 4:23	27:15
18:8	17:25	regular	response
product-	questions	26:9, 11	4:21
contacting	6:13 27:5	related	Restates
16:10 21:5	quick 26:22	18:13	15:7

result 16:21	screen 7:12	starting	T
17:2, 5, 8,	9:2 12:9	13:3	
22	23:6, 9	starts 14:9	table 12:10
results 17:3	scroll 7:19	stated 17:22	tad 9:8
19:7	14:6	19:15, 21,	taking 4:9,
Riis 11:15,	share 7:12	23	18, 23
18, 19	shared 23:6	States 13:23	6:10, 11
12:8, 24	She'll 4:22	14:2	talking 4:24
13:14	short 6:1	Stephen 4:2	technical
14:15, 22	sick 6:11	7:16 8:10	6:16
15:14, 16,	side 12:17	Steve 7:8, 11	ten 24:7
22 16:2	14:13 15:3	sticky 7:4	terephthalate
19:3, 20, 22	16:10	strength	10:3
20:6, 8, 10,	21:5, 6	23:18, 21	tested 16:24
15, 25	sign 27:9	24:19	testified
21:3, 16	signature	structure	4:4
22:23	7:24 27:15	9:17, 21	testimony
23:12	similar	12:1, 13	15:8
25:4, 14, 15	18:17	16:24	testing 9:18
Riis/osborn	simply 22:24	18:14	16:16
16:13	23:13 25:5	19:2, 11	17:15, 20
19:9, 14	26:15	20:4, 15	18:8, 15, 24
22:19	sir 7:17	21:3 22:23	thickness
25:8, 13	13:15 17:7	23:12 25:3	19:19, 22
room 4:20	21:14	26:2	25:22
7:7	slower 16:7	submitted	thicknesses
rules 4:15	sorted 6:17	11:17	19:21
s	Sounds 27:1	substitute	things 4:14
SAITH 27:14	specific	26:1	tie 20:5
scope 21:23	16:18	superior	21:9, 15, 21
22:8, 16	start 13:2	16:21	22:5, 14
24:4, 15, 23		17:2, 5, 21	23:1, 15, 24
25:19		sworn 4:4	

24:2, 8, 13,	
21 25:6,	V
16, 21	
26:19	verbal 5:7, 9
Tim 7:8, 11	versus 14:22
23:5 26:22	23:24
27:4	virtually
time 5:23	4:18
27:10	
today 4:9, 14	W
6:7, 21	weight 26:10
top 12:5	worded 5:13
14:10	work 4:19
touch 26:24	
truthful 6:8	
type 11:11	
U	
understand	
5:13, 15, 18	
6:12 10:5	
17:25	
18:19	
23:20	
26:16	
understanding	
11:19 26:2	
Understood	
14:19	
unit 26:10	
United 13:22	
14:1	