

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

MPL BRANDS,

Petitioner,

v.

BUZZBALLS, LLC,

Patent Owner.

Case PGR2024-00035 (Patent No. 11,932,441)

CM#58822.418US01

VIDEOCONFERENCE DEPOSITION OF

JOSEPH T. NORRIS

INDIVIDUALLY AND ON BEHALF OF

MPL BRANDS NV, INC.

FEBRUARY 20, 2025

Page 1 - 39

11:59 a.m. - 12:44 p.m. CST

REPORTED BY:

Tamara L. Houston

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

Job Number J12413350

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THE SULLIVAN GROUP OF COURT REPORTERS

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VIDEOCONFERENCE DEPOSITION OF JOSEPH T. NORRIS,
taken on behalf of the Patent Owner, commencing from
11:59 a.m. to 12:44 p.m., Thursday, February 20, 2025,
before Tamara L. Houston, CSR No. 7244, CCRR, RPR.

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APPEARANCE OF COUNSEL:

On behalf of the Petitioner:

**PERKINS COIE LLP
BY: DANIEL T. SHVODIAN, ESQ.
3150 Porter Drive
Palo Alto, California 94304
shvodian-ptab@perkinscoie.com**

On behalf of the Patent Owner:

**HAYNES & BOONE, LLP
BY: GREGORY P. WEBB, ESQ.
ADAM ERICKSON, ESQ.
2810 N. Harwood Street
Street 2300
Dallas, Texas 75201
greg.webb@haynesboone.com
mark.erickson@haynesboone.com**

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23
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INDEX TO EXAMINATION

WITNESS: JOSEPH T. NORRIS

EXAMINATIONS	PAGE
Mr. Webb.....	6
Mr. Shvodian.....	34

QUESTIONS INSTRUCTED NOT TO ANSWER

Page Line

NONE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX TO EXHIBITS

JOSEPH T. NORRIS

MPL BRANDS vs. BUZZBALLS, LLC

FEBRUARY 20, 2025

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

EXHIBIT	DESCRIPTION	PAGE
	NONE MARKED	
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1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
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THURSDAY, FEBRUARY 20, 2025, 11:59 A.M.

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COURT REPORTER: Counsel, for the record, My name is Tamara Houston, California Certified Shorthand Reporter No. 7244.

JOSEPH T. NORRIS,
called as a witness
was sworn and testified as follows:

--000--

EXAMINATION BY MR. WEBB:

Q. Good morning, Mr. Norris.
How are you doing today?

A. Good morning, guys.

Q. My name is Greg Webb. I represent the patent owner, BuzzBallz, in IPR (PGR2024-00035) which involves U.S. Patent Number 11,932,441.

Now, you understand that I will be asking questions about the declarations provided in this PGR, correct?

MR. SHVODIAN: Greg, just the fact -- should we state appearances just so we have it in the record?

MR. WEBB: Sure. We can, yeah. Greg Webb for BuzzBallz, patent owner.

MR. SHVODIAN: Dan Shvodian from Perkins Coie for MPL Brands NV, Inc.

1 (Court reporter requested clarification.)

2 MR. SHVODIAN: For Perkins Coie, C-O-I-E. I
3 represent MPL Brands NV, Inc., and Mr. Norris.

4 COURT REPORTER: Thank you.

5 MR. SHVODIAN: Thanks.

6 Go ahead, Greg.

7 MR. WEBB: Perfect.

8 BY MR. WEBB

9 Q. So, Mr. Norris, you understand that I will be
10 asking you questions about the declaration you provided
11 in this PGR, correct?

12 A. I do, yes.

13 Q. Perfect. Can you state your full name for the
14 record?

15 A. Joseph T., for Thomas, Norris.

16 Q. And have you been deposed before?

17 A. Once.

18 Q. And what was the context of that deposition?

19 A. It was a personal injury lawsuit.

20 Q. All right. Those are -- those are always
21 exciting. This probably won't be quite as exciting.

22 Is there any reason why you would not be able
23 to answer my questions today fully, accurately, and
24 honestly?

25 A. I don't think so, no. There's no reason.

1 Q. Okay. If you don't understand my question,
2 please let me know. If you answer my question, I'll
3 assume that you understood my question.

4 Is that okay?

5 A. Yes. Yeah.

6 Q. Your counsel may object to questions
7 throughout this deposition. Unless your counsel
8 instructs you not to answer a specific question, you are
9 required to answer my questions.

10 Is that understood?

11 A. Yes.

12 Q. The court reporter will prepare a transcript
13 of this deposition. To ensure that we have a clean
14 record of the deposition, please answer each question
15 with a verbal response such as "yes" or "no," and do not
16 answer with mm-hmm or head movements.

17 Is this understood?

18 A. Yes.

19 Q. Perfect. Also, the court reporter may have
20 difficulties accurately recording who is speaking if
21 we're cross-talking. In order to ensure an accurate
22 record, let me finish my questions before you answer,
23 and I'll do the same by letting you finish your answer
24 before I ask another question. Okay?

25 A. I understand, yes.

1 Q. During the portion of the deposition today
2 where I'll be asking you questions, you're not permitted
3 to speak with your counsel about the substance of your
4 testimony including your declaration or your deposition
5 today.

6 Is that understood?

7 A. Yes, I understand.

8 Q. And I plan to take -- I plan to ask questions
9 in maybe one-hour segments, and then we can take a ten-
10 to 15-minute break after each hour.

11 Is that okay with you?

12 A. Yes.

13 Q. And if you need a break before that, just let
14 me know. I'm happy to accommodate that, but -- so we
15 can ensure a clean record, if you'll just answer the
16 question that I've asked before the break, that will
17 work best.

18 Does that work for you?

19 A. Yes. See, I have a UPS package coming that I
20 have to sign for, so if the doorbell rings, I just have
21 to step away to sign for it.

22 Q. Yeah. Happy to accommodate that.

23 And where are you located today?

24 A. I'm at my home, north of Atlanta, Georgia.

25 Q. And are you alone there today?

1 A. Yes.

2 Q. Okay. And do you have a phone with you?

3 A. Yes.

4 Q. Do you agree not to use your phone during the
5 questioning portion of this deposition today?

6 A. Yes, I do.

7 Q. Perfect.

8 And what equipment are you using for this
9 deposition?

10 A. A Microsoft Surface Pro.

11 Q. Okay. For some of the questions today, we
12 will be asking you about certain documents, primarily
13 your declaration. So we'll be using the Zoom feature,
14 the chat feature to provide you with those documents, so
15 let me try that now. I am uploading Exhibit 1005,
16 declaration of Joseph T. Norris.

17 Can you see if you can open that from the
18 chat?

19 (Whereupon Exhibit 1005 was referenced.)

20 THE WITNESS: I have to save it first so I
21 can't just open it by clicking it.

22 BY MR. WEBB:

23 Q. I'm sure.

24 A. Yeah, it shows me a pdf, but it does give me
25 the ability to download it, but it doesn't give me the

1 ability to actually see it.

2 Q. Okay. You may have to download it first.

3 A. Okay. But I have a copy of it in front of me.
4 Would this be suitable?

5 Q. Yes. I think that should be fine. I guess,
6 if you will open it and just confirm that what you have
7 in front of you matches what is -- matches what's in
8 front of you, that would be best.

9 A. Okay. Just give me a second.

10 Q. Sure.

11 A. Yes, it appears to be the same document I have
12 in front of me.

13 Q. Okay. We'll come back to that in a minute,
14 but thank you for that.

15 Do you have any other documents or notes in
16 front of you today about your testimony?

17 A. No.

18 Q. Okay. And I also ask that you not have any
19 other documents open on your computer during the
20 deposition.

21 Is that okay?

22 A. Yes. The only thing I have open is the pdf
23 you just sent me.

24 Q. Okay. Perfect. And do you have any chat
25 windows or text message threads open where you're

1 communicating with counsel?

2 A. No.

3 Q. Okay. I'd like you to keep it that way during
4 the questioning portion of the deposition, please.

5 A. Okay. I will.

6 Q. Perfect. Who did you meet with to prepare for
7 your deposition today?

8 A. The counsel you see on the camera, Daniel
9 Shvodian.

10 Q. Perfect. And approximately how long did you
11 spend preparing for your deposition?

12 A. Probably two hours. I wrote this document,
13 you know, last May, so it's been eight months since I
14 prepared it.

15 Q. Okay. And prior to this case, have you ever
16 testified as a witness for MPL brands, Patco brands, or
17 Big Sipz?

18 A. No.

19 Q. And prior to your involvement in this case,
20 did you personally know anyone related to those
21 companies?

22 A. No.

23 Q. And prior to this case did you know anyone at
24 Perkins Coie?

25 A. No.

1 Q. How did you get involved in this case?

2 A. Perkins Coie called me one day because they
3 were seeking to find someone who worked at Coca-Cola who
4 had firsthand knowledge of a project that Coke did back
5 in the mid '80s to produce a plastic can for Coca-Cola.

6 Q. Okay. And you provided testimony in
7 connection with PGR2024-00035 involving U.S. Patent
8 Number 11,932,441, correct?

9 A. Yes.

10 Q. And more specifically provided a sworn
11 declaration that was submitted along with the petition
12 for that PGR, correct?

13 A. Yes. The declaration we're talking about,
14 yes.

15 Q. And so you have that document, Exhibit 1005,
16 declaration of Joseph T. Norris that you have open on
17 your computer, but you also have a hard copy in front of
18 you, correct?

19 A. Yes, I do.

20 Q. And is this Exhibit 1005 your declaration?

21 A. Yes.

22 Q. And if I refer to Exhibit 1005 as your
23 declaration, you will understand that I'm referring to
24 this Exhibit 1005 and PGR2024-00035, correct?

25 A. I understand, yes.

1 Q. Okay. Let's turn to page 19 of your
2 declaration, please.

3 A. Okay. Hold on.

4 Q. Just let me know when you're there.

5 A. Yes, I'm there.

6 Q. Is that your signature on page 19?

7 A. It is.

8 Q. And did you sign your declaration on May 31st,
9 2024?

10 A. Yes.

11 Q. And since then have you acquired any
12 additional information or obtained any supplemental
13 insights that would change the positions set forth in
14 your declaration?

15 A. No.

16 Q. And do you continue to stand behind all of the
17 statements in your declaration?

18 A. I do.

19 Q. And can you read paragraph 40 of your
20 declaration? It starts towards the bottom of page 18.

21 A. Yes. You want me to read it out loud?

22 Q. You can read it to yourself right now,
23 whichever you prefer.

24 A. Yes, I understand what it says.

25 Q. Okay. And do you understand that during your

1 deposition today you are under the same oath as set
2 forth in your sworn declaration?

3 A. Yes.

4 Q. Did you prepare your declaration?

5 A. I wrote a Word document giving my experience
6 with Coke's plastic can and then Perkins Coie, you know,
7 organized it into this format.

8 Q. Okay. So it was a collaborative effort
9 between you and counsel for MPL brands?

10 A. Yes.

11 Q. Did anyone else besides counsel for MPL help
12 prepare your declaration?

13 A. No.

14 Q. And approximately how long did you spend
15 preparing your declaration?

16 A. I think I spent about two to two-and-a-half
17 hours.

18 Q. Okay. In preparing your declaration, did you
19 review the petition associated with PGR2024-00035?

20 A. No.

21 Q. So you didn't see any drafts of the petition?

22 A. When you say "petition," you have to be more
23 specific for me to understand what it is.

24 Q. Okay. With the post-grant review request, the
25 Petitioner filed its own petition requesting the

1 challenge of the patent. This is usually prepared by
2 counsel.

3 I'm wondering if you reviewed what was
4 submitted with PGR or any drafts of that in preparing
5 your declaration?

6 A. No. I don't -- I don't recall reviewing
7 anything like that.

8 Q. Okay. So then you're not aware of how your
9 testimony is portrayed in the petition?

10 A. If I didn't see the petition, I wouldn't know
11 how to portray it.

12 Q. Okay. Perfect. And in preparing your
13 declaration, did you review the declaration of
14 Dr. Belson that was submitted as Exhibit 1002 as part of
15 the PGR?

16 A. No.

17 Q. Okay. And in reaching the conclusions set
18 forth in your declaration, did you rely on any other
19 documents or evidence beyond what is referenced in your
20 declaration?

21 A. No.

22 Q. Okay. Thank you. Let's turn to paragraphs 37
23 and 38 of your declaration, please.

24 A. Yes.

25 Q. Let me know when you're there.

1 A. Yeah.

2 Q. Okay. Yeah. Can you please review your
3 testimony in those paragraphs and just let me know when
4 you've completed your review.

5 A. So Section 37 is about the paper advertisement
6 about Coke PET cans?

7 Q. Yes.

8 A. Yeah, like this is the advertisement that I
9 have.

10 Q. Yes. Those are the paragraphs I'm
11 referencing, correct.

12 A. Yes. So page 30 -- paragraph 37 refers to
13 this advertisement that was used in store. And then 38,
14 you said -- it says, "I understand that this
15 advertisement is included as an exhibit."

16 So what would you like me to say about these
17 two paragraphs?

18 Q. Sure. In Coke land. So in paragraph 38, as
19 you just referenced, you state, "I understand that this
20 advertisement is included as an exhibit to MPL's
21 post-grant review petition." Correct?

22 A. Yes.

23 Q. And then you go on to say, "I have reviewed
24 that exhibit"; is that correct?

25 A. Yes. This -- a scan of this exhibit, yes.

1 Q. Okay. Let me throw this next document into
2 the chat.

3 Would you download that one and open it real
4 quick?

5 A. Yes, sir. I have it open.

6 Q. Okay. Is this Exhibit 1006, Coca-Cola plastic
7 can marketing material, is that the exhibit you were
8 referencing in paragraph 38?

9 A. Yes, it is.

10 Q. And were you involved in producing this
11 advertisement that's in Exhibit 1006?

12 A. No.

13 MR. SHVODIAN: Objection. Just give me a sec
14 to object. Objection. Form.

15 Go ahead, Joe.

16 THE WITNESS: Yeah. No. This was a marketing
17 brochure, so I had no participation in preparing it.

18 BY MR. WEBB:

19 Q. Okay. Great. Let's turn to paragraph 35 in
20 your declaration, please.

21 A. Yes, sir.

22 Q. You want to take a second to review your
23 statement there, and I'll have a couple questions for
24 you.

25 A. Yes. You can go ahead.

1 Q. Okay. In paragraph 35 you state that, "I
2 understand that MPL and its counsel are in possession of
3 several Coca-Cola PET cans including a Sprite, Diet
4 Coke, Coca-Cola Classic, and New Coke can."

5 Then you state that, "I've reviewed images of
6 these projects, which I understand are exhibits to MPL's
7 petition." Is that correct?

8 A. Yes, I've looked at pictures. Yes.

9 Q. And do you know what exhibit to MPL's
10 post-grant review petition that you reviewed that
11 included these pictures?

12 A. I don't because I -- I saw them -- they are
13 embedded in my declaration.

14 Q. Okay. Let's took a look at those. Is the
15 image on page 10 of your declaration one of the images
16 you reviewed?

17 A. Yes, it is.

18 Q. And going up a page to page 9, is that another
19 of the images of the products in MPL's counsel's
20 possession that you reviewed?

21 A. Yes, it is.

22 Q. And turning to page 13, is that another of the
23 images of the products in MPL's counsel's possession
24 that you reviewed?

25 A. Yes, it is.

1 Q. Did you include any other images of the
2 products in MPL's counsel's possession in your
3 declaration?

4 A. No, if they are not here, they weren't
5 included, so no.

6 Q. Okay. So then the three pictures found on
7 pages 9, 10, and 13 are the images of the products in
8 your declaration, correct?

9 A. Yes.

10 Q. Let's turn to page 8 of your declaration, and
11 please read out loud the Footnote No. 3 on the bottom of
12 page 8, please.

13 A. "This is a photo of the bottom of a Coke PET
14 can that was sold by Coke in 1985. I have several such
15 cans in my possession bearing labels for Coke (which was
16 later renamed 'New Coke' as discussed below), Coke
17 Classic, Diet Coke, and Sprite and all bear this same
18 marking on the bottom."

19 Q. Is the photo that follows on page 9 a photo of
20 a can from your collection?

21 A. No.

22 Q. So then the photo on page 9 shows a can in MPL
23 counsel's possession, correct?

24 A. Correct. What -- if I could say what I did
25 was I verified that the cans in my possession and the

1 can in this photo are identical.

2 Q. Okay. Did you include any photos or images of
3 the cans from your personal collection in your
4 declaration?

5 A. No.

6 Q. Okay. So the images are here only from the
7 cans that were in possession of counsel, correct?

8 A. Yes.

9 Q. And have you ever physically seen or
10 physically handled any of the cans in MPL counsel's
11 possession?

12 A. No.

13 Q. Are you aware of how MPL's counsel obtained
14 the cans in their possession?

15 A. I believe when I asked that question they said
16 they purchased them on eBay.

17 Q. Okay. Give me one second here. All right.
18 Let's turn to paragraphs 10 and 11 in your declaration,
19 please.

20 A. I'm looking at them now.

21 Q. Okay. And I guess, just so we're on the same
22 page, I think we have already agreed to this, but when I
23 use the terms PCAN or PET can or Coca-Cola PCAN or
24 Coca-Cola PET can, we understand that I'm referring to
25 the cans made of P-E-T or PET that you describe in your

1 declaration?

2 A. Yes. PCAN was like a code name that was used
3 inside the company to name the project, but it referred
4 to beverage cans made of PET.

5 Q. Okay. Perfect. And where were you living in
6 1983 when the PCAN project started?

7 A. I was living in London, England.

8 Q. All right. And when you took over as project
9 manager in 1984, did you move back to the states?

10 A. Yeah, I moved from London back to Atlanta to
11 take over managing this project.

12 Q. Okay. And during your time as project manager
13 of the PCAN project, you indicated you would visit
14 Petainer's manufacturing facility in Dongen,
15 Netherlands, correct?

16 (Court reporter requested clarification.)

17 BY MR. WEBB:

18 Q. And during your time as project manager of the
19 PCAN project, you would visit Petainer's manufacturing
20 facility in Dongen, Netherlands, correct?

21 A. Yes, I did.

22 Q. How often would you visit Petainer's
23 manufacturing facility?

24 A. Every two weeks.

25 Q. And how long were your visits?

1 A. Two weeks.

2 Q. Okay.

3 A. So Coca-Cola had a representative onsite
4 100 percent of the time when these cans were made.

5 Q. So you were two weeks on, two weeks off or
6 just --

7 A. Correct. Correct.

8 Q. Okay. So you were there on a two-week visit
9 in May 1985, and you indicate you received that notice
10 that Coke was going to begin selling New Coke in a PCAN?

11 A. No. Let's maybe be clear. We were in
12 production in July of 1985 when we got notice that the
13 cans we were labeling as New Coke, we had to stop
14 producing them and they sent us new labels to relabel
15 them as Coca-Cola Classic cans.

16 So it was in that period of time when
17 Coca-Cola of North America had launched New Coke to so
18 much fanfare, and then very quickly there was a lot of
19 backlash from consumers about it.

20 So being in production on these cans, we were
21 caught in the nexus of -- the marketplace was changing
22 quickly, and we had to add Coca-Cola Classic to the
23 collection of cans we were producing. That wasn't the
24 way the project started, but it was the way we had to
25 adapt. So like I said, my memory was we had to make

1 that change around July of 1985.

2 Q. Got you. But you were in Dongen in May of
3 1985, correct?

4 A. I -- I don't remember if I was there in May or
5 not, but I was there, like, every two weeks. So I could
6 have been there in May. I just don't remember that
7 specific fact.

8 Q. Okay. Let's turn to paragraphs 33 and 34 of
9 your declaration, please.

10 A. 33 and 34. Okay.

11 Q. Yes.

12 A. I'm there.

13 Q. Were there any Coca-Cola PCANs filled and
14 assembled at facilities other than the Columbus,
15 Georgia, facility?

16 A. No. Not for commercial sale, no.

17 Q. Okay. In paragraph 34 when you indicate, "As
18 I mentioned, above each PCAN also included a mark on the
19 pushup portion of the base that identified Petainer,
20 S.A., as the manufacturer of the PET can body."

21 What mark are you referring to?

22 A. The mark that's in the pushup of the base of
23 the can. It says, you know -- it says, "Petainer ,"
24 and it has a patent number on it, Patent No. 4405546 and
25 others.

1 Q. In paragraph 34, you're referring back to your
2 testimony in paragraph 16 where you state that Petainer
3 marked the bottom of each can with "Petainer PAT," for
4 patent, "4,405,546 and others"?

5 A. Yes, all of the commercial cans were marked
6 that way. Yes, that's correct.

7 Q. Right. And that's what's showing in Figure 9
8 -- or sorry, photo on page 9 of your declaration?

9 A. Just give me a second. I'll go back to that
10 page.

11 Q. Sure.

12 A. Yes, that's the Petainer mark.

13 Q. Okay. Perfect. In going back to paragraphs
14 33 and 34, there appear to be four different markings on
15 all authentic Coca-Cola PCANs; is that correct?

16 MR. SHVODIAN: Objection.

17 BY MR. WEBB:

18 Q. And I'm happy to walk through those markings
19 with you, if you like.

20 A. I'm sorry. Just please restate what paragraph
21 you wanted me to go to.

22 Q. Yes. So based on your testimony in paragraphs
23 33 and 34, it looks like there are four different
24 markings on all authentic Coca-Cola PCANs; is that
25 correct?

1 MR. SHVODIAN: Objection to form.

2 THE WITNESS: It's not clear to me, sir, what
3 markings you are talking about. So are you talking
4 about a marking on the body of the can or marking on the
5 label that's applied to the can or any markings on the
6 lid of the can?

7 BY MR. WEBB:

8 Q. Yeah. Let's walk through the markings that I
9 see that you mentioned in paragraphs 33 and 34.

10 So the first one I notice is the label
11 stating, "Canned under the authority of the Coca-Cola
12 Company, Atlanta, Georgia, by Columbus Coca-Cola
13 Bottling Company, Columbus, Georgia 31908?"

14 Is that one of the markings?

15 A. Yes. That was on each of the labels for each
16 of the brands, yes.

17 Q. And the second marking I see is that there was
18 a marking for recycling that said, "Consumer/Recycling
19 information call 1-800-GET-COKE (438-2053)."

20 Is that the second marking?

21 A. That was on the label underneath the canning
22 authority, yes.

23 Q. Okay. And then the third marking I was
24 referencing from your testimony here is that there would
25 be a bar code unique to the beverage sold.

1 Is that the third marking?

2 A. Yes, exactly. Each brand had its own unique
3 UPC code.

4 Q. And just to clarify there, so Sprite would
5 have one type of code; Coke would have a separate type
6 of code; Diet Coke would have another type of code; is
7 that correct?

8 A. Well, yes and no. They all are using the same
9 Universal Product Code, but each of them have a unique
10 number, and that number is what the register -- where
11 you check out at a store -- scans to identify the unique
12 beverage you are buying or unique product you're buying.

13 Q. Right. Okay. And then the fourth marking I
14 was referring to was the Petainer marking on the bottom
15 that we just discussed was the "Petainer Patent
16 4,405,546 and others."

17 Is that the fourth mark?

18 A. Yes. If you're counting correctly, yes.

19 Q. Okay. And these four markings are indicative
20 of an authentic Coca-Cola PCAN, correct?

21 A. They are.

22 Q. Okay. Turn to paragraph 36 of your
23 declaration. When you say, "Based on the markings of
24 the PET can products in possession of MPL," are you
25 referring to the four different markings we just

1 discussed?

2 A. Yes. Based on the photographs that were
3 supplied to me, yes.

4 Q. Okay. Are there any other markings that you
5 relied upon to identify the PET can products in MPL
6 counsel's possession as authentic Coca-Cola PCANS?

7 A. No.

8 Q. And was Petainer the only manufacturer of the
9 PCAN for Coca-Cola?

10 A. Yes.

11 Q. Let's turn to paragraph 11 in your
12 declaration, please.

13 A. Okay.

14 Q. Okay. In the second sentence of paragraph 11,
15 what do you mean by "maintaining an aluminum top"?

16 A. We -- we needed to at the time -- this was a
17 development by a plastic can body, but we were not
18 initiating any developments around changing the aluminum
19 top.

20 The aluminum top is a pretty complex piece of
21 package engineering because it provides an easy-open tab
22 for the consumer. Sometimes people call it a stay-on
23 tab, where you lift the tab, and it vents the slit in
24 the top of the can to reveal the beverage so you can
25 consume it directly.

1 So, again, our goal of the project was to
2 develop a plastic body that was compatible with our
3 product and filling lines but using or maintaining the
4 aluminum top. We weren't trying to create a supply
5 chain change in terms of the top.

6 Q. Okay. Let's turn to paragraph 20 of your
7 declaration.

8 A. Yes, sir. I'm there.

9 Q. When you say, "seal the container with a
10 standard aluminum SOT, stay-on tab, top," this is the
11 same type of aluminum top you were describing in
12 paragraph 11, correct?

13 A. Yes. These cans -- this is what's called a
14 stay-on aluminum top. There was a transition in earlier
15 years of the '80s from what people might remember as a
16 ring pull top where you would pull the ring and the
17 entire ring would come off, and people would discard
18 that, and it became an issue of litter but also like on
19 beaches it was a safety issue because people would step
20 on them.

21 So the stay-on tab was invented by the can
22 industry to kind of eliminate those litter and injury,
23 you know, cases, if you want to call it that. So
24 that -- that's why people refer to these ends as stay-on
25 tab or SOT ends.

1 Q. Okay. And do these standard aluminum tops
2 have a standard size or diameter?

3 A. So, yes and no. The aluminum ends can come in
4 different diameters based on the package you're trying
5 to seal. But in this case, these were the standard end
6 diameters in use at the time on aluminum cans. I
7 believe these were 209 size, but in today's world, as a
8 consumer, if you buy a 12-ounce soft drink can, you'll
9 usually encounter an end that's a 202 size.

10 So it's a -- that's the industry term for the
11 diameter of the ends. And, you know, the smaller the
12 end size, the smaller the diameter, but the less metal
13 is used as well.

14 Q. Okay. So there was a standard size for
15 particular drink applications?

16 A. Yes. Again, we were trying to fit into the
17 envelope of the Columbus bottling plant where we didn't
18 want to -- we had to run aluminum cans and plastic cans
19 at the same time, and so we wanted to minimize the
20 changes going back and forth from one to the other.

21 MR. SHVODIAN: Greg, hold on a second.

22 Mr. Norris, just slow down and give me a
23 chance -- I want to pose an objection to the form of the
24 last question.

25 THE WITNESS: Yes, sir. I'm sorry.

1 MR. SHVODIAN: And so just -- pause a little
2 bit so I can have time to object if need be. Thank you.

3 (Discussion held off the record.)

4 BY MR. WEBB:

5 Q. So the PET can bodies that you developed, they
6 were developed to match the known size of the standard
7 aluminum top?

8 A. That would be correct.

9 Q. Okay.

10 MR. SHVODIAN: Objection. Form to that
11 question as well.

12 BY MR. WEBB:

13 Q. All right. You mentioned in a couple spots in
14 your declaration that you have a collection of Coca-Cola
15 products and memorabilia, correct?

16 A. Yes.

17 Q. When did this collection first start?

18 A. I think about 1978.

19 Q. And approximately how many items are in your
20 collection?

21 A. Mine is somewhat minor, but probably 50 to
22 100.

23 Q. And where do you keep your collection?

24 A. Down in my basement here in the house.
25 Sometimes you can see things above my desk here.

1 Q. Sure. Have you moved since you started your
2 collection?

3 A. Have I moved since I started my collection?
4 Yes.

5 Q. And how do you handle your collection during
6 moves?

7 A. I put them in boxes.

8 Q. And do you keep any documentation of the items
9 in your collection?

10 A. No, it's -- I don't -- I collect them based on
11 my professional experience, but I don't collect them to
12 sell them or anything like that.

13 Q. Okay. And given your collection, I guess
14 you're familiar with the collectability of Coca-Cola
15 items, correct?

16 A. Yes, they are remarkably -- you know, a lot of
17 packages for Coca-Cola or advertisement signs or, you
18 know, related items like that are collected by people,
19 yes.

20 Q. In your view, what is it about Coca-Cola items
21 that makes them collectable?

22 A. I -- I think it's like anybody else. People
23 have a passion that they collect. Some people might
24 collect, you know, cars or golf clubs or print media,
25 and people collect Coca-Cola items. Sometimes it's from

1 the United States. Sometimes it's from different
2 markets around the world. So...

3 Q. Are you aware of any fake versions of
4 Coca-Cola products or memorabilia?

5 A. I'm -- I'm not aware of it.

6 Q. Okay. So you haven't encountered any fake
7 versions of Coca-Cola products or memorabilia?

8 A. In my role at Coca-Cola, I was in the, you
9 know, technical department and research and development,
10 so I didn't deal with trademark items like plates or
11 saucers or cups or things. So I don't have any
12 knowledge of that.

13 Q. Okay. Let's take a five-minute break. We may
14 be done here, but I want to go through my notes and see
15 if there's anything else. So let's -- let's see. It's
16 11 -- 12:32 your time. Let's hop back on at 12:40.

17 Does that work?

18 A. Sure.

19 (Recess: 11:33 a.m. to 11:39 a.m.)

20 MR. WEBB: All right. Mr. Norris, thank you
21 very much for your time today. I have no further
22 questions.

23 Dan, if you want any redirect, he's all yours.

24 MR. SHVODIAN: I do have a couple of
25 questions. Thank you, Greg.

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EXAMINATION BY MR. SHVODIAN:

BY MR. SHVODIAN:

Q. Mr. Norris, I saw you holding up a can on your desk or that you have there with you. Was -- can you describe what -- what is that can you were holding up?

A. I have two from my collection. One is the Coke Classic can, and one is the Sprite can, you know.

Q. Okay. And are those cans you have from -- well, how did you come into possession of those cans?

A. From the Columbus, Georgia, market trial.

Q. And what is the time period from when those -- when you acquired those cans?

A. I would say October 1984, or thereabouts, plus or minus two weeks.

Q. Okay. And --

A. I'm sorry. October '85.

Q. October '85, okay. Can you look at the Sprite can?

A. Yes.

Q. And do you see in -- and if you look in paragraph 33 of your declaration, the last sentence quotes -- says, "The labels were further labeled, quote, 'Consumer/Recycling information call 1-800-GET-COKE (438-2053).' "

Do you see that in your declaration?

1 A. I do, but I'm looking at the can, and the
2 correct number is 438-2653.

3 Q. Okay. And -- okay. And --

4 A. But 1-800-GET-COKE, Dan, is the right, you
5 know, vernacular.

6 Q. Okay. So 1-800-GET-COKE is the number, and
7 the digits represent what -- what did the digits
8 represent?

9 A. On a touch-tone phone, how you would dial
10 GET-COKE, yeah.

11 Q. Okay. And can you look at the Coke Classic
12 can you said you have there in your possession?

13 A. Yes, I'm looking at it.

14 Q. Okay. Can you look on the label.

15 Does that contain the same -- same phrase that
16 is in your declaration regarding the consumer recycling?

17 A. Yeah. This particular one says
18 "Consumer/recycling information call 1-800-GET-COKE,"
19 but it doesn't have the translation into the numeric
20 equivalent.

21 Q. Okay. And does that can that does not have
22 the numeric translation for the Coke Classic, is that a
23 can from October 1985?

24 A. It is, yes.

25 Q. And how do you know that?

1 A. Because I -- I -- it's been in my possession
2 since October 1985 when I picked it up.

3 MR. SHVODIAN: Okay. I have no further
4 questions.

5 COURT REPORTER: Counsel, may I get transcript
6 requests on the record if we're concluded?

7 MR. WEBB: We'd like a rough. Thank you.

8 MR. SHVODIAN: Yeah. We'd like the same,
9 please.

10 (Whereupon the proceedings concluded at
11 12:44 p.m.)

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ERRATA SHEET
NAME OF CASE: MPL BRANDS v. BUZZBALLS, LLC
DATE OF DEPOSITION: FEBRUARY 20, 2025
NAME OF WITNESS: JOSEPH T. NORRIS

Reason Codes:

- 1: To clarify the record.**
- 2: To conform to the facts.**
- 3: To correct transcription error.**

Page	_____	Line	_____	Reason	_____
From	_____				to _____
Page	_____	Line	_____	Reason	_____
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Page	_____	Line	_____	Reason	_____
From	_____				to _____
Page	_____	Line	_____	Reason	_____
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DECLARATION UNDER PENALTY OF PERJURY

I, JOSEPH T. NORRIS, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on February 20, 2025; that I have made such corrections as appear noted on the Deposition Errata Page(s), attached hereto, signed by me; that my testimony as contained herein, as corrected, is true and correct.

This Declaration is executed this _____ day of _____, 20____, at _____, California.

JOSEPH T. NORRIS

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(	15-minute 9:10	26:9	A
(438-2053).' 34:24	16 25:2	35 18:19 19:1	a.m. 6:1 33:19
-	18 14:20	36 27:22	ability 10:25 11:1
--o0o-- 6:2,9	19 14:1,6	37 16:22 17:5,12	accommodate 9:14,22
1	1978 31:18	38 16:23 17:13,18 18:8	accurate 8:21
1-800-GET-COKE 26:19 34:23 35:4,6,18	1983 22:6	4	accurately 7:23 8:20
10 19:15 20:7 21:18	1984 22:9 34:13	4,405,546 25:4 27:16	acquired 14:11 34:12
100 23:4 31:22	1985 20:14 23:9,12 24:1,3 35:23 36:2	40 14:19	adapt 23:25
1002 16:14	2	438-2053 26:19	add 23:22
1005 10:15,19 13:15,20,22, 24	20 6:1 29:6	438-2653 35:2	additional 14:12
1006 18:6,11	202 30:9	4405546 24:24	advertisement 17:5,8,13,15,20 18:11 32:17
11 21:18 28:11,14 29:12 33:16	2024 14:9	5	agree 10:4
11,932,441 6:16 13:8	2025 6:1	50 31:21	agreed 21:22
11:33 33:19	209 30:7	7	ahead 7:6 18:15,25
11:39 33:19	3	7244 6:5	aluminum 28:15,18,20 29:4,10,11, 14 30:1,3,6,18 31:7
11:59 6:1	3 20:11	8 20:10,12	America 23:17
12-ounce 30:8	30 17:12	80s 13:5 29:15	appearances 6:21
12:32 33:16	31908 26:13	85 34:16,17	appears 11:11
12:40 33:16	31st 14:8	9	applications 30:15
12:44 36:11	33 24:8,10 25:14,23 26:9 34:21	9 19:18 20:7,19,22 25:7,8	applied 26:5
13 19:22 20:7	34 24:8,10,17 25:1,14,23	8	approximately 12:10 15:14 31:19

assembled 24:14 assume 8:3 Atlanta 9:24 22:10 26:12 authentic 25:15,24 27:20 28:6 authority 26:11,22 aware 16:8 21:13 33:3,5 <hr/> <div style="text-align: center;">B</div> back 11:13 13:4 22:9,10 25:1,9,13 30:20 33:16 backlash 23:19 bar 26:25 base 24:19,22 based 25:22 27:23 28:2 30:4 32:10 basement 31:24 beaches 29:19 bear 20:17 bearing 20:15 begin 23:10 Belson 16:14 beverage 22:4 26:25 27:12 28:24 Big 12:17 bit 31:2	bodies 31:5 body 24:20 26:4 28:17 29:2 bottling 26:13 30:17 bottom 14:20 20:11,13,18 25:3 27:14 boxes 32:7 brand 27:2 brands 6:25 7:3 12:16 15:9 26:16 break 9:10,13,16 33:13 brochure 18:17 buy 30:8 buying 27:12 Buzzballz 6:15,23 <hr/> <div style="text-align: center;">C</div> C-O-I-E 7:2 California 6:4 call 26:19 28:22 29:23 34:23 35:18 called 6:7 13:2 29:13 camera 12:8 Canned 26:11 canning 26:21 cans 17:6 19:3 20:15,25	21:3,7,10,14,25 22:4 23:4,13,15,20,23 25:5 29:13 30:6,18 34:8,9,12 cars 32:24 case 12:15,19,23 13:1 30:5 cases 29:23 caught 23:21 Certified 6:4 chain 29:5 challenge 16:1 chance 30:23 change 14:13 24:1 29:5 changing 23:21 28:18 chat 10:14,18 11:24 18:2 check 27:11 clarification 7:1 22:16 clarify 27:4 Classic 19:4 20:17 23:15,22 34:7 35:11,22 clean 8:13 9:15 clear 23:11 26:2 clicking 10:21 clubs 32:24 Coca-cola 13:3,5 18:6 19:3,4 21:23,24 23:3,15,17,22	24:13 25:15,24 26:11, 12 27:20 28:6,9 31:14 32:14,17,20,25 33:4,7,8 code 22:2 26:25 27:3,5,6,9 Coie 6:25 7:2 12:24 13:2 15:6 Coke 13:4 17:6,18 19:4 20:13,14,15,16,17 23:10,13,17 27:5,6 34:7 35:11,22 Coke's 15:6 collaborative 15:8 collect 32:10,11,23,24,25 collectability 32:14 collectable 32:21 collected 32:18 collection 20:20 21:3 23:23 31:14, 17,20,23 32:2,3,5,9,13 34:6 Columbus 24:14 26:12,13 30:17 34:10 commercial 24:16 25:5 communicating 12:1 companies 12:21 company 22:3 26:12,13 compatible 29:2 completed 17:4 complex 28:20
--	---	--	--

computer 11:19 13:17 concluded 36:6,10 conclusions 16:17 confirm 11:6 connection 13:7 consume 28:25 consumer 28:22 30:8 35:16 Consumer/recycling 26:18 34:23 35:18 consumers 23:19 container 29:9 context 7:18 continue 14:16 copy 11:3 13:17 correct 6:19 7:11 13:8,12,18,24 17:11,21,24 19:7 20:8, 23,24 21:7 22:15,20 23:7 24:3 25:6,15,25 27:7,20 29:12 31:8,15 32:15 35:2 correctly 27:18 counsel 6:3 8:6,7 9:3 12:1,8 15:9,11 16:2 19:2 21:7, 13 36:5 counsel's 19:19,23 20:2,23 21:10 28:6 counting 27:18 couple 18:23 31:13 33:24	court 6:3 7:1,4 8:12,19 22:16 36:5 create 29:4 cross-talking 8:21 cups 33:11 <hr/> D Dan 6:24 33:23 35:4 Daniel 12:8 day 13:2 deal 33:10 declaration 7:10 9:4 10:13,16 13:11,13,16,20,23 14:2, 8,14,17,20 15:2,4,12, 15,18 16:5,13,18,20,23 18:20 19:13,15 20:3,8, 10 21:4,18 22:1 24:9 25:8 27:23 28:12 29:7 31:14 34:21,25 35:16 declarations 6:18 department 33:9 deposed 7:16 deposition 7:18 8:7,13,14 9:1,4 10:5,9 11:20 12:4,7,11 15:1 describe 21:25 34:5 describing 29:11 desk 31:25 34:4 develop 29:2	developed 31:5,6 development 28:17 33:9 developments 28:18 dial 35:9 diameter 30:2,11,12 diameters 30:4,6 Diet 19:3 20:17 27:6 difficulties 8:20 digits 35:7 directly 28:25 discard 29:17 discussed 20:16 27:15 28:1 discussion 31:3 document 11:11 12:12 13:15 15:5 18:1 documentation 32:8 documents 10:12,14 11:15,19 16:19 Dongen 22:14,20 24:2 doorbell 9:20 download 10:25 11:2 18:3 drafts 15:21 16:4 drink 30:8,15	E earlier 29:14 easy-open 28:21 ebay 21:16 effort 15:8 eliminate 29:22 embedded 19:13 encounter 30:9 encountered 33:6 end 30:5,9,12 ends 29:24,25 30:3,11 engineering 28:21 England 22:7 ensure 8:13,21 9:15 entire 29:17 envelope 30:17 equipment 10:8 equivalent 35:20 evidence 16:19 EXAMINATION 6:10 34:1 exciting 7:21 exhibit 10:15,19 13:15,20,22,
---	---	--	---

24 16:14 17:15,20,24, 25 18:6,7,11 19:9 exhibits 19:6 experience 15:5 32:11 <hr/> F facilities 24:14 facility 22:14,20,23 24:15 fact 6:20 24:7 fake 33:3,6 familiar 32:14 fanfare 23:18 feature 10:13,14 FEBRUARY 6:1 Figure 25:7 filed 15:25 filled 24:13 filling 29:3 find 13:3 fine 11:5 finish 8:22,23 firsthand 13:4 fit 30:16 five-minute 33:13	Footnote 20:11 form 18:14 26:1 30:23 31:10 format 15:7 found 20:6 fourth 27:13,17 front 11:3,7,8,12,16 13:17 full 7:13 fully 7:23 <hr/> G Georgia 9:24 24:15 26:12,13 34:10 GET-COKE 35:10 give 10:24,25 11:9 18:13 21:17 25:9 30:22 giving 15:5 goal 29:1 golf 32:24 Good 6:11,13 Great 18:19 Greg 6:14,20,22 7:6 30:21 33:25 guess 11:5 21:21 32:13 guys 6:13	<hr/> H handle 32:5 handled 21:10 happy 9:14,22 25:18 hard 13:17 head 8:16 held 31:3 hold 14:3 30:21 holding 34:3,5 home 9:24 honestly 7:24 hop 33:16 hour 9:10 hours 12:12 15:17 house 31:24 Houston 6:4 <hr/> I identical 21:1 identified 24:19 identify 27:11 28:5 image 19:15 images 19:5,15,19,23 20:1,7	21:2,6 include 20:1 21:2 included 17:15,20 19:11 20:5 24:18 including 9:4 19:3 indicative 27:19 industry 29:22 30:10 information 14:12 26:19 34:23 35:18 initiating 28:18 injury 7:19 29:22 inside 22:3 insights 14:13 instructs 8:8 invented 29:21 involved 13:1 18:10 involvement 12:19 involves 6:15 involving 13:7 IPR 6:15 issue 29:18,19 items 31:19 32:8,15,18,20,25 33:10
--	--	--	---

<hr/> <p style="text-align: center;">J</p> <p>Joe 18:15</p> <p>Joseph 6:6 7:15 10:16 13:16</p> <p>July 23:12 24:1</p> <hr/>	<p>located 9:23</p> <p>London 22:7,10</p> <p>long 12:10 15:14 22:25</p> <p>looked 19:8</p> <p>lot 23:18 32:16</p> <p>loud 14:21 20:11</p> <hr/>	<p>20:18 26:4,17,18,20,23 27:1,13,14</p> <p>markings 25:14,18,24 26:3,5,8,14 27:19,23,25 28:4</p> <p>match 31:6</p> <p>matches 11:7</p> <p>material 18:7</p> <p>media 32:24</p> <hr/>	<p>6:11,13</p> <p>move 22:9</p> <p>moved 22:10 32:1,3</p> <p>movements 8:16</p> <p>moves 32:6</p> <p>MPL 6:25 7:3 12:16 15:9,11 19:2 20:22 21:10 27:24 28:5</p> <p>MPL's 17:20 19:6,9,19,23 20:2 21:13</p> <hr/>
<p style="text-align: center;">K</p> <p>kind 29:22</p> <p>knowledge 13:4 33:12</p> <hr/>	<p style="text-align: center;">M</p> <p>made 21:25 22:4 23:4</p> <p>maintaining 28:15 29:3</p> <p>make 23:25</p> <p>makes 32:21</p> <p>manager 22:9,12,18</p> <p>managing 22:11</p> <p>manufacturer 24:20 28:8</p> <p>manufacturing 22:14,19,23</p> <p>mark 24:18,21,22 25:12 27:17</p> <p>marked 25:3,5</p> <p>market 34:10</p> <p>marketing 18:7,16</p> <p>marketplace 23:21</p> <p>markets 33:2</p> <p>marking</p>	<p>meet 12:6</p> <p>memorabilia 31:15 33:4,7</p> <p>memory 23:25</p> <p>mentioned 24:18 26:9 31:13</p> <p>message 11:25</p> <p>metal 30:12</p> <p>Microsoft 10:10</p> <p>mid 13:5</p> <p>Mine 31:21</p> <p>minimize 30:19</p> <p>minor 31:21</p> <p>minus 34:14</p> <p>minute 11:13</p> <p>mm-hmm 8:16</p> <p>months 12:13</p> <p>morning</p>	<p style="text-align: center;">N</p> <p>needed 28:16</p> <p>Netherlands 22:15,20</p> <p>nexus 23:21</p> <p>Norris 6:6,11 7:3,9,15 10:16 13:16 30:22 33:20 34:3</p> <p>north 9:24 23:17</p> <p>notes 11:15 33:14</p> <p>notice 23:9,12 26:10</p> <p>number 6:16 13:8 24:24 27:10 35:2,6</p> <p>numeric 35:19,22</p> <p>NV 6:25 7:3</p> <hr/>
<p style="text-align: center;">L</p> <p>label 26:5,10,21 35:14</p> <p>labeled 34:22</p> <p>labeling 23:13</p> <p>labels 20:15 23:14 26:15 34:22</p> <p>land 17:18</p> <p>launched 23:17</p> <p>lawsuit 7:19</p> <p>letting 8:23</p> <p>lid 26:6</p> <p>lift 28:23</p> <p>lines 29:3</p> <p>litter 29:18,22</p> <p>living 22:5,7</p>			<hr/> <p style="text-align: center;">O</p> <p>oath 15:1</p>

object 8:6 18:14 31:2 objection 18:13,14 25:16 26:1 30:23 31:10 obtained 14:12 21:13 October 34:13,16,17 35:23 36:2 one-hour 9:9 onsite 23:3 open 10:17,21 11:6,19,22,25 13:16 18:3,5 order 8:21 organized 15:7 owner 6:15,23	16:14 participation 18:17 passion 32:23 PAT 25:3 Patco 12:16 patent 6:14,16,23 13:7 16:1 24:24 25:4 27:15 pause 31:1 PCAN 21:23 22:2,6,13,19 23:10 24:18 27:20 28:9 PCANS 24:13 25:15,24 28:6 pdf 10:24 11:22 people 28:22 29:15,17,19,24 32:18,22,23,25 percent 23:4 Perfect 7:7,13 8:19 10:7 11:24 12:6,10 16:12 22:5 25:13 period 23:16 34:11 Perkins 6:24 7:2 12:24 13:2 15:6 permitted 9:2 personal 7:19 21:3 personally 12:20 PET 17:6 19:3 20:13 21:23, 24,25 22:4 24:20 27:24 28:5 31:5	Petainer 24:19,23 25:2,3,12 27:14,15 28:8 Petainer's 22:14,19,22 petition 13:11 15:19,21,22,25 16:9,10 17:21 19:7,10 Petitioner 15:25 PGR 6:18 7:11 13:12 16:4,15 PGR2024-00035 6:15 13:7,24 15:19 phone 10:2,4 35:9 photo 20:13,19,22 21:1 25:8 photographs 28:2 photos 21:2 phrase 35:15 physically 21:9,10 picked 36:2 pictures 19:8,11 20:6 piece 28:20 plan 9:8 plant 30:17 plastic 13:5 15:6 18:6 28:17 29:2 30:18 plates 33:10 portion 9:1 10:5 12:4 24:19 portray 16:11	portrayed 16:9 pose 30:23 positions 14:13 possession 19:2,20,23 20:2,15,23, 25 21:7,11,14 27:24 28:6 34:9 35:12 36:1 post-grant 15:24 17:21 19:10 prefer 14:23 prepare 8:12 12:6 15:4,12 prepared 12:14 16:1 preparing 12:11 15:15,18 16:4,12 18:17 pretty 28:20 primarily 10:12 print 32:24 prior 12:15,19,23 Pro 10:10 proceedings 36:10 produce 13:5 producing 18:10 23:14,23 product 27:9,12 29:3 production 23:12,20 products 19:19,23 20:2,7 27:24 28:5 31:15 33:4,7
<hr/> <p style="text-align: center;">P</p>			
P-E-T 21:25 p.m. 36:11 package 9:19 28:21 30:4 packages 32:17 pages 20:7 paper 17:5 paragraph 14:19 17:12,18 18:8,19 19:1 24:17 25:1,2,20 27:22 28:11,14 29:6,12 34:21 paragraphs 16:22 17:3,10,17 21:18 24:8 25:13,22 26:9 part			

professional 32:11	real 18:3	remember 24:4,6 29:15	run 30:18
project 13:4 22:3,6,8,11,12,13, 18,19 23:24 29:1	reason 7:22,25	renamed 20:16	<hr/> S
projects 19:6	recall 16:6	reporter 6:3,5 7:1,4 8:12,19 22:16 36:5	S.A. 24:20
provide 10:14	received 23:9	represent 6:14 7:3 35:7,8	safety 29:19
provided 6:18 7:10 13:6,10	recess 33:19	representative 23:3	sale 24:16
pull 29:16	record 6:3,21 7:14 8:14,22 9:15 31:3 36:6	request 15:24	saucers 33:11
purchased 21:16	recording 8:20	requested 7:1 22:16	save 10:20
pushup 24:19,22	recycling 26:18 35:16	requesting 15:25	scan 17:25
put 32:7	redirect 33:23	requests 36:6	scans 27:11
<hr/> Q	refer 13:22 29:24	required 8:9	seal 29:9 30:5
question 8:1,2,3,8,14,24 9:16 21:15 30:24 31:11	referenced 10:19 16:19 17:19	research 33:9	sec 18:13
questioning 10:5 12:4	referencing 17:11 18:8 26:24	response 8:15	Section 17:5
questions 6:18 7:10,23 8:6,9,22 9:2,8 10:11 18:23 33:22,25 36:4	referred 22:3	restate 25:20	seeking 13:3
quick 18:4	referring 13:23 21:24 24:21 25:1 27:14,25	reveal 28:24	segments 9:9
quickly 23:18,22	refers 17:12	review 15:19,24 16:13 17:2,4, 21 18:22 19:10	sell 32:12
quote 34:22	register 27:10	reviewed 16:3 17:23 19:5,10,16, 20,24	selling 23:10
quotes 34:22	relabel 23:14	reviewing 16:6	sentence 28:14 34:21
<hr/> R	related 12:20 32:18	ring 29:16,17	separate 27:5
reaching 16:17	relied 28:5	rings 9:20	set 14:13 15:1 16:17
read 14:19,21,22 20:11	rely 16:18	role 33:8	Shorthand 6:4
	remarkably 32:16	rough 36:7	showing 25:7
			shows 10:24 20:22

Shvodian 6:20,24 7:2,5 12:9 18:13 25:16 26:1 30:21 31:1,10 33:24 34:1,2 36:3,8	stand 14:16	6:8 13:10 15:2	33:21
sign 9:20,21 14:8	standard 29:10 30:1,2,5,14 31:6	T	today's 30:7
signature 14:6	start 31:17	tab 28:21,23 29:10,21,25	top 28:15,19,20,24 29:4,5, 10,11,14,16 31:7
signs 32:17	started 22:6 23:24 32:1,3	talking 13:13 26:3	tops 30:1
Sipz 12:17	starts 14:20	Tamara 6:4	touch-tone 35:9
sir 18:5,21 26:2 29:8 30:25	state 6:21 7:13 17:19 19:1,5 25:2	technical 33:9	trademark 33:10
size 30:2,7,9,12,14 31:6	statement 18:23	ten- 9:9	transcript 8:12 36:5
slit 28:23	statements 14:17	term 30:10	transition 29:14
slow 30:22	states 22:9 33:1	terms 21:23 29:5	translation 35:19,22
smaller 30:11,12	stating 26:11	testified 6:8 12:16	trial 34:10
soft 30:8	stay-on 28:22 29:10,14,21,24	testimony 9:4 11:16 13:6 16:9 17:3 25:2,22 26:24	turn 14:1 16:22 18:19 20:10 21:18 24:8 27:22 28:11 29:6
sold 20:14 26:25	step 9:21 29:19	text 11:25	turning 19:22
SOT 29:10,25	stop 23:13	thereabouts 34:13	two-and-a-half 15:16
speak 9:3	store 17:13 27:11	thing 11:22	two-week 23:8
speaking 8:20	submitted 13:11 16:4,14	things 31:25 33:11	type 27:5,6 29:11
specific 8:8 15:23 24:7	substance 9:3	Thomas 7:15	U
specifically 13:10	suitable 11:4	threads 11:25	U.S. 6:16 13:7
spend 12:11 15:14	supplemental 14:12	throw 18:1	underneath 26:21
spent 15:16	supplied 28:3	THURSDAY 6:1	understand 6:17 7:9 8:1,25 9:7 13:23,25 14:24,25 15:23 17:14,19 19:2,6 21:24
spots 31:13	supply 29:4	time 22:12,18 23:4,16 28:16 30:6,19 31:2 33:16,21 34:11	understood 8:3,10,17 9:6
Sprite 19:3 20:17 27:4 34:7,17	Surface 10:10	today 6:12 7:23 9:1,5,23,25 10:5,11 11:16 12:7 15:1	
	sworn		

unique 26:25 27:2,9,11,12	windows 11:25	
United 33:1	wondering 16:3	
Universal 27:9	Word 15:5	
UPC 27:3	work 9:17,18 33:17	
uploading 10:15	worked 13:3	
UPS 9:19	world 30:7 33:2	
<hr/>	wrote 12:12 15:5	
V	<hr/>	
vents 28:23	Y	
verbal 8:15	years 29:15	
verified 20:25	<hr/>	
vernacular 35:5	Z	
versions 33:3,7	Zoom 10:13	
view 32:20		
visit 22:13,19,22 23:8		
visits 22:25		
<hr/>		
W		
walk 25:18 26:8		
wanted 25:21 30:19		
Webb 6:10,14,22 7:7,8 10:22 18:18 22:17 25:17 26:7 31:4,12 33:20 36:7		
weeks 22:24 23:1,5 24:5 34:14		
whichever 14:23		