

Mr. Richard M. Martinez, Esq.
ROBINS, KAPLAN, MILLER & CIRESI
2800 LA SALLE Plaza
800 LaSalle Avenue
Minneapolis, MN 55402

Mr. John D. Vandenberg, Esq.
Ms. Kristen P. Lantz Reichenbach, PhD, Esq.
KARQUIST SPARKMAN
One World Trade Center
121 SW Salmon Street
Portland, OR 97204

IN RE: American Express, et al v. Metasearch Systems
Case CBM2014-00001
Patent 8,326,924
Deposition of Dr. Jaime Carbonell – Exhibit 1041


Dear Counsel:

It came to the attention of Paradigm Reporting & Captioning that the exhibit index prepared in the above-referenced deposition by Paradigm Court Reporter Dana Anderson-Linnell contains an error on page 4 at Line 23. Specifically, it purports to indicate that the document entitled “Travel Related Items” was marked for identification as Exhibit #1041 in the Carbonell deposition, when, in fact, it was not ultimately marked as such; it was simply referenced as such on page 118.

Attached please find an Affidavit by Ms. Anderson-Linnell testifying to the same.

If further questions remain, feel free to contact me directly.

Thank you,


Jan Ballman, RPR, CMRS
President

Attachment

1400 Rand Tower • 527 Marquette Avenue South • Minneapolis, MN 55402-1331

(612) 339-0545 • 1-800-545-9668 • Fax (612) 337-5575
depos@paradigmreporting.com • paradigmreporting.com

AMERICAN EXPRESS V. METASEARCH
CBM2014-00001 EXHIBIT 2041 - 1

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That as part of that verbatim transcript, I created my standard Exhibit Index, which attempts to create an efficiency for counsel by listing the pages upon which documents are marked for identification and/or referenced throughout the deposition;

That there were no new exhibits marked in the deposition of Dr. Jaime Carbonell, only previously marked exhibits which were referred to in the deposition;

That in creating my standard Exhibit Index, I therefore referenced, on Page 4 of said transcript, all exhibits previously marked for identification but referenced during the deposition of Dr. Jaime Carbonell;

That on Page 4, Line 23 of the transcript, I erroneously referred to a document entitled "Travel-Related Item" as "Exhibit 1041" in the Exhibit Index, but, in fact, that document was never marked as such during the deposition of Dr. Jaime Carbonell;

That said notation in the Exhibit Index came from the reference on page 118 of "Exhibit 1041;" however, that document was never marked into evidence by me on August 28th, 2014, as the Exhibit Index would appear to indicate.

FURTHER AFFIANT SAITH NOT.

I hereby swear that the above representations are true and correct, to the best of my knowledge, belief and information.

9-22-14
Date

Dana S. Anderson
Dana S. Anderson-Linnell, Court Reporter

STATE OF MINNESOTA
COUNTY OF RAMSEY

I, the undersigned Notary Public, do hereby affirm that Dana Anderson-Linnell personally appeared before me on the 22nd day of September, 2014, and signed the above Affidavit as a free and voluntary act.

Valerie Travers
Notary Public

