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**\*\* HIGHLY CONFIDENTIAL \*\***  
**UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF TENNESSEE**  
**GREENEVILLE DIVISION**  
**Civil Action No. 2:14-CV-00196**

-----x  
**DENTSPLY INTERNATIONAL, INC. and TULSA**  
**DENTAL PRODUCTS LLC d/b/a TULSA DENTAL**  
**SPECIALTIES,**

**Plaintiffs,**

**- against -**

**US ENDODONTICS, LLC,**

**Defendant.**

-----x  
**September 19, 2014**  
**9:24 a.m.**

**Videotaped Deposition of BOBBY**  
**BENNETT, taken by Plaintiffs, pursuant to**  
**Notice, held at the offices of Kenyon &**  
**Kenyon LLP, One Broadway, New York, New**  
**York, before Todd DeSimone, a Registered**  
**Professional Reporter and Notary Public of**  
**the State of New York.**

**GOLD STANDARD EXHIBIT 2014**  
**US ENDODONTICS v. GOLD STANDARD**  
**CASE IPR2015-01476**

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4 stream, so yeah, they are all important.  
5 Q. Are there any other products  
6 that US Endo sells that are as profitable  
7 as the EdgeFiles?

8 A. [REDACTED]

9 Q. Are there any other products  
10 that US Endo sells that are responsible  
11 for as much revenue as EdgeFiles?

12 A. I'm not sure. I'm not sure. I  
13 would have to break it down and look at  
14 it.

15 Q. Do you consider the EdgeFiles  
16 to be a successful product?

17 A. Yes.

18 Q. So have you received positive  
19 feedback from Edge Endo regarding the  
20 EdgeFiles?

21 A. No, I can't say that I have.

22 Q. So what makes you think of the  
23 EdgeFiles as a successful product?

24 A. Because of the testing that we  
25 conducted on them.

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5 A. You know, I'm not confident on  
6 the first few sizes. On the -- from the  
7 size 30 up, on the 30 and the 40, I know  
8 that is [REDACTED] heat treatment. It is  
9 the same thing for the 25 and 29  
10 millimeter.

11 Q. So all of the 25 millimeter  
12 EdgeFile X3s and 29 millimeter EdgeFile  
13 X3s are heated for [REDACTED] hours; is that  
14 right?

15 A. No, that's not correct.

16 Q. Sorry, are you referring to  
17 just the size 30 and 40s?

18 A. Correct.

19 Q. For the other sizes of the 21,  
20 25 and 29 millimeter EdgeFile X3s, do you  
21 recall how long those are heated?

22 A. I don't, not with detail. I  
23 could be off on those.

24 Q. What different durations does  
25 US Endo use for the heat treatment step?

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5 is coming in at these first two. I can't  
6 recall specifically if they are at [REDACTED]  
7 [REDACTED] [REDACTED] because it is typically  
8 based off of diameter, what I've seen  
9 anyhow, and those are too close for me to  
10 speculate without looking at something.

11 Q. Do you have any documentation  
12 that details the duration of the heat  
13 treatment process that US Endo uses for  
14 these particular size EdgeFile X3s that  
15 are reflected in Bennett Exhibit 4 on  
16 pages 2 and 3?

17 A. I do.

18 Q. And you would be able to look  
19 at that documentation regarding the  
20 duration of heat treatment to figure out  
21 how long they were heated?

22 A. Yes.

23 Q. But right now it's your  
24 understanding that it is either -- excuse  
25 me, right now it is your understanding

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