

HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL ONLY
JAKE KAPPELMAN November 15, 2016

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

OXBO INTERNATIONAL CORP.,)
)
Plaintiff,)
)
vs.) Civil Action No.
) 15-CV-292-JDP
H&S MANUFACTURING COMPANY,)
INC.,)
) VIDEOTAPED
Defendant.) DEPOSITION OF
) JAKE KAPPELMAN
H&S MANUFACTURING COMPANY,)
INC.,)
)
Counterclaim Plaintiff,)
)
vs.)
)
OXBO INTERNATIONAL CORP.)
AND KUHN NORTH AMERICA, INC.,)
)
Counterclaim Defendants.))
-----)

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THE VIDEOTAPED DEPOSITION OF JAKE KAPPELMAN, taken before Buffy Nelson, Registered Professional Reporter and Notary Public, commencing at 9:16 a.m., November 15, 2016, at 305 Second Avenue Southeast, Cedar Rapids, Iowa.

Reported by: Buffy Nelson, R.P.R.

Oxbo International Corporation, Patent Owner
Exhibit 2011
H&S Manufacturing Company, Inc. v. Oxbo
International Corporation
IPR2016-00950

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1 APPEARANCES
 2 Plaintiff by:
 SHANE A. BRUNNER
 3 Attorney at Law
 Merchant & Gould, PC
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 7 H&S Manufacutring Company, Inc., by:
 ERIC H. CHADWICK
 8 Attorney at Law
 Patterson Thuente
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 12 Videographer: Wesley Nygren

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[REDACTED]

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[REDACTED]

19 Exhibit 12 Photos 170
 20 Exhibit 13 Photos 170


[REDACTED]

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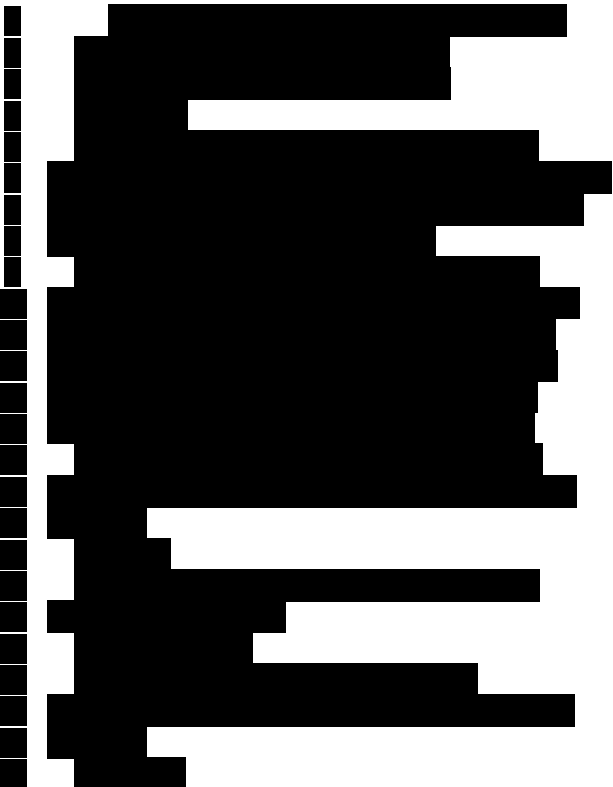
1 PROCEEDINGS
 2 (Exhibit 1 was marked for
 3 identification by the reporter.)
 4 THE VIDEOGRAPHER: We are on the
 5 video record. This begins DVD number 1 in the
 6 deposition of Jake Kappelman in the matter of
 7 Oxbo International Corp. versus H&S
 8 Manufacturing Company, Inc., filed in the
 9 United States District Court, Western District
 10 of Wisconsin, Case Number 15-CV-292-JDP.
 11 Today's date is November 15, 2016. The time on
 12 the video screen is 9:16 a.m. The video
 13 operator today is Wesley Nygren, certified
 14 legal video specialist. This deposition is
 15 being taken at 305 Second Avenue Southeast,
 16 Cedar Rapids, Iowa.
 17 Will counsel please identify
 18 yourselves and state whom you represent.
 19 MR. BRUNNER: Shane Brunner of
 20 Merchant & Gould for the plaintiff, Oxbo.
 21 MR. CHADWICK: Eric Chadwick,
 22 Patterson Thuente, for the defendant
 23 H&S Manufacturing.
 24 THE VIDEOGRAPHER: The court
 25 reporter today is Buffy Nelson, a certified

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1 shorthand reporter. Would the reporter please
2 swear in the witness.
3 JAKE KAPPELMAN,
4 called as a witness, having been first duly
5 sworn, testified as follows:
6 DIRECT EXAMINATION
7 BY MR. BRUNNER:
8 **Q. Morning, Mr. Kappelman.**
9 A. Morning.
10 **Q. Could you please state your name for**
11 **the record and spell your name?**
12 A. Jake Kappelman, J-a-k-e
13 K-a-p-p-e-l-m-a-n.



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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

18 **Q. Was H&S your first job after**
19 **graduating college?**
20 A. Yes.
21 **Q. How long did you work there?**
22 A. Let's see. I worked there from May of
23 2008 full-time until May of 2012.
24 **Q. What was your title?**
25 A. Product engineer.

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1 **Q. And while you were at H&S, what were**
2 **your roles and responsibilities?**
3 A. Basically I spent most of my time on
4 the Tri-Flex, I'd say, program, sharing some
5 responsibility with grinder-mixers and the
6 manure spreaders.
7 **Q. And when you say most of your time,**
8 **are you talking 95 percent of your time was on**
9 **the Tri-Flex?**
10 A. Probably between 85 and 90.

[REDACTED]

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1 durability and manufacturability, cost. I had
2 some involvement with hydraulics, then some
3 involvement with electrical.

[REDACTED]

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[REDACTED]

20 **Q. And what was your role with respect to**
21 **the Tri-Flex?**
22 A. So Tri -- for the Tri-Flex I was
23 primarily responsible for the pick-up
24 cross-conveyor design, basically refining some
25 of the framework design, improving its

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[REDACTED]

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