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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

DNA GENOTEK INC.,

PLAINTIFF,

VS.

C.A. NO.

15-CV-00661-SLR

SPECTRUM DNA, SPECTRUM
SOLUTIONS L.L.C., AND
SPECTRUM PACKAGING L.L.C.,

DEFENDANTS.

DEPOSITION OF: JOHN COLLINS, Ph.D

San Diego, California

Friday, November 13, 2015

Reported by:
Marlene Apodaca
CSR No. 6579

ANCESTRY EX. 1025

1 Q Are you aware of occasions where a friction
2 fit is used to seal a chamber?

3 A I believe a friction fit can be used to seal a
4 chamber.

5 Q So a test tube with a snap-on cap would be a
6 friction fit that sealed the test tube?

7 MR. KRAMER: Objection to form.

8 THE WITNESS: Yeah. I wouldn't really equate
9 a snap fit with a friction fit.

10 A test tube with a stopper inserted would be
11 an example.

12 BY MR. SACKSTEDER:

13 Q So you draw a distinction between a snap-on
14 cap and a friction fit?

15 A Correct.

16 Q Can you elaborate on that explain what the
17 difference is?

18 A Sure. A snap fit typically involves
19 displacing material and using the elastic properties of
20 the material to come back to it, so that to remove
21 something, you have to do mechanical work to displace
22 it, to displace something, and overcome an
23 interference.

24 Q So and the example you gave was a stopper for
25 a test tube?

1 A Correct, as friction.

2 Q Okay. In paragraph 18 in your discussion of
3 person of ordinary skill in the art, you say that a
4 person of ordinary skill in the art would have to have
5 some experience with medical experience, medical
6 devices.

7 Do you see that?

8 A Yes, I do.

9 Q How much experience?

10 A I think enough to understand the context of
11 what's going on.

12 Q And how much is that?

13 A It all depends. It could be very intense
14 over, you know, a few days, or it could be less intense
15 over a longer period of time.

16 Q So it could be a long -- a fairly wide range?

17 A Sure, it could be. But it doesn't need to be.

18 Q The spikes that are disclosed in the '424
19 patent, they are not cylindrical.

20 Correct?

21 MR. KRAMER: Objection to form.

22 THE WITNESS: The ones in the embodiments are
23 not, no.

24 BY MR. SACKSTEDER:

25 Q So to the extent that a trocar is cylindrical,