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

JUBILANT DRAXIMAGE, INC.,
Petitioner,
vs.
BRACCO DIAGNOSTICS, INC.,
Patent Owner.

IPRs2018-01448, -01449, and -01450
U.S. Patent Nos. 9,229,467 and 9,229,468

The Deposition of VENKATESH MURTHY, M.D.,
Taken at 900 Victors Way, Suite 261,
Ann Arbor, Michigan,
Commencing at 9:01 a.m.,
Thursday, May 23, 2019,
Before Lezlie A. Setchell, CSR-2404, RPR, CRR.

U.S. LEGAL SUPPORT
(877) 479-2484

1 APPEARANCES:

2

3 T. CY WALKER

4 BakerHostetler, LLP

5 Washington Square, Suite 1100

6 1050 Connecticut Avenue, N.W.

7 Washington, DC 20036-5304

8 202.861.1688

9 cwalker@bakerlaw.com

10 Appearing on behalf of the Petitioner.

11

12 BARRY J. SCHINDLER

13 GreenbergTraurig, LLP

14 500 Campus Drive

15 Suite 400

16 Florham Park, New Jersey 07932-0677

17 973.360.7944

18 schindlerb@gtlaw.com

19 Appearing on behalf of the Patent Owner.

20

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EXHIBITS

EXHIBIT	PAGE
(Exhibits attached to transcript.)	
EXHIBIT 1001	6
Declaration of Venkatesh L. Murthy, M.D., Ph.D.	
EXHIBIT 1002	42
Bracco CardioGen-82 Infusion System User's Guide	

1 Ann Arbor, Michigan

2 Thursday, May 23, 2019

3 9:01 a.m.

4 VENKATESH MURTHY, M.D.,

5 was thereupon called as a witness herein, and after
6 having first been duly sworn to testify to the truth,
7 the whole truth and nothing but the truth, was
8 examined and testified as follows:

9

10 EXAMINATION

11 BY MR. SCHINDLER:

12 Q. Good morning, Doctor. My name is Barry Schindler, and
13 I represent Bracco Diagnostics in the case before the
14 U.S. Patent Office. I actually see before you a
15 Declaration that you had executed in this proceeding;
16 is that correct?

17 A. Yes.

18 Q. So I actually have a copy, also, of that Declaration,
19 but I gather if you want to use your own, would that
20 be more comfortable for you?

21 A. Yes. I actually have a couple of minor corrections of
22 typos and things.

23 Q. Excellent. So we'll get there. Before we get there,
24 as I understand that previously that you have had your
25 deposition taken at least twice now I believe?

1 **A. This will be my third deposition, yeah.**

2 Q. And you've also appeared at an ITC trial?

3 **A. Yep, that was my first time in court.**

4 Q. Okay. So I understand then that you understand sort
5 of the basic ground rules, and the ground rules are,
6 one, I will ask you a question. You will wait until I
7 finish my question. Is that okay?

8 **A. Yes.**

9 Q. And then you will answer, I will wait until you
10 answer, and I will not interrupt you. Do you
11 understand that?

12 **A. Yes.**

13 Q. Second, if you don't understand the question, you will
14 ask me if you don't understand. Otherwise, I will
15 assume you understood my question, correct?

16 **A. Okay.**

17 Q. And if you need to take a break at any time, just say
18 I need to take a break; do you understand that?

19 **A. Understood.**

20 MR. SCHINDLER: Actually, let's do some
21 what we'll call the administrative part first. I
22 understand you said you had some typos. So I'm going
23 to use as Jubilant Exhibit 1017, which is the
24 Declaration you executed, and on this I'm going to use
25 a red pen, and I would like you to mark up in red pen

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