	Page 1
1	UNITED STATES DISTRICT COURT
2	FOR THE DISTRICT OF MINNESOTA
3	
4	VASCULAR SOLUTIONS, LLC,
5	TELEFLEX INNOVATIONS, S.à r.l.,
6	ARROW INTERNATIONAL, INC.,
7	and TELEFLEX, LLC,
8	Plaintiffs,
9	vs. No. 0:19-cv-01760-PJS-TNL
10	MEDTRONIC, INC., and
11	MEDTRONIC VASCULAR, INC.,
12	Defendants.
13	
14	VIDEO EXPERT DEPOSITION TESTIMONY OF
15	PETER T. KEITH
16	WEDNESDAY, OCTOBER 16, 2019
17	MINNEAPOLIS, MINNESOTA
18	* * *
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21	
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23	
24	
25	
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Page 2		Page 4
* * *		APPEARANCES (continued):
		FREDRIKSON & BYRON, P.A.
		BY: KURT J. NIEDERLUECKE, ESQUIR
	4	kniederluecke@fredlaw.com
-	5	LAURA L. MYERS, ESQUIRE
Sixth Street, Minneapolis, Minnesota on	6	lmyers@fredlaw.com
Wednesday, October 16, 2019, commencing at 9:00	7	Suite 4000
a.m. before Rebecca L. Klanderud, a Certified	8	200 South Sixth Street
Shorthand Reporter.	9	Minneapolis, Minnesota 55402
	10	612.492.7000
	11	Counsel for Defendants
	12	
	13	ROBINS KAPLAN, LLP
* * *	14	BY: CYRUS A. MORTON, ESQUIRE
	15	cmorton@robinskaplan.com
	-	Suite 2800
		800 LaSalle Avenue
		Minneapolis, Minnesota 55402
		612.349.8722
		Counsel for Defendants
		Also Present:
		Greg Smock, Vascular Solutions, Inc.
	25	
Page 3	1	Page 5 INDEX:
		EXAMINATION: PAGE
-		By Mr. Niederluecke 9, 291
-		By Mr. Winkels 286
· ·		
		EXHIBITS:
		MEDTRONIC EXHIBITS: PAGE MARKED
		Exhibit 1 United States Patent No.
		US 8,048,032 B2, Root, et al. 8
-		Exhibit 2 United States Reissued Patent No.
	11	US RE45,380 E, Root, et al. 8
Counsel for Plaintiffs		Exhibit 3 United States Reissued Patent No.
	13	US RE45,776 E, Root, et al. 8
	14	Exhibit 4 United States Reissued Patent No.
BY: KENNETH E. LEVITT, ESQUIRE	15	US RE47,379 E, Root, et al. 8
levitt.kenneth@dorsey.com	16	Exhibit 5 United States Reissued Patent No.
Suite 1500	17	US RE45,760 E, Root, et al. 8
50 South Sixth Street	18	Exhibit 6 Declaration of Peter Keith in
	19	Support of Plaintiffs' Motion for
Minneapolis, Minnesota 55402	19	
	20	Preliminary Injunction 12
Minneapolis, Minnesota 55402		Preliminary Injunction 12 Exhibit 7 Teleflex GuideLiner V3 Catheter
Minneapolis, Minnesota 55402 612.340.2755	20	
Minneapolis, Minnesota 55402 612.340.2755	20 21	Exhibit 7 Teleflex GuideLiner V3 Catheter
Minneapolis, Minnesota 55402 612.340.2755	20 21 22	Exhibit 7 Teleflex GuideLiner V3 Catheter product brochure 14
	 * * * Video Expert Deposition Testimony of PETER T. KEITH taken at the law offices of Fredrikson & Byron, P.A., Suite 4000, 200 South Sixth Street, Minneapolis, Minnesota on Wednesday, October 16, 2019, commencing at 9:00 a.m. before Rebecca L. Klanderud, a Certified Shorthand Reporter. * * * 	* * * 1 Video Expert Deposition Testimony of PETER T. KEITH taken at the law offices of Fredrikson & Byron, P.A., Suite 4000, 200 South Sixth Street, Minneapolis, Minnesota on Wednesday, October 16, 2019, commencing at 9:00 a.m. before Rebecca L. Klanderud, a Certified Shorthand Reporter. 9 10 * * * * * * * A * * * A A PETER T. KEITH taken at the law offices of Fredrikson & Byron, P.A., Suite 4000, 200 South Sixth Street 9 APPEARANCES: 1 CARLSON, CASPERS, VANDENBURGH, 2 LINDQUIST & SCHUMAN, P.A. 3 BY: JOSEPH W. WINKELS, ESQUIRE jwinkels@carlsoncaspers.com 7 Suite 4200 8 225 South Sixth Street 9 Minneapolis, Minnesota 55402 10 612.436.9600 11 Counsel for Plaintiffs 12 DORSEY & WHITNEY, LLP 14 BY: KENNETH E. LEVITT, ESQUIRE 15 levitt.kenneth@dorsey.com 16

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EXHIBITS (continued): MEDTRONIC EXHIBITS: PAGE MARKED Exhibit 9 Article by Takahashi, et al. entitled: "New Method to Increase	$\begin{vmatrix} 1\\ 2\\ 2 \end{vmatrix}$	* * * (Whereupon, Deposition Exhibits 1
Exhibit 9 Article by Takahashi, et al.		(Whereupon, Deposition Exhibits 1
-		
antitlade "Navy Mathed to Increase	3	through 5 were marked for
	4	identification.)
a Backup Support of Six French	5	* * *
Guiding Coronary Catheter." 50	6	THE VIDEO TECHNICIAN: We are goin
Exhibit 10 Medtronic Telescope Guide	7	on the record at 9:02 a.m.
Extension Catheter - Retained by	8	Today's date is October 16th, 2019.
Counsel, Mr. Niederluecke 91	9	This is media unit one of the video-recorded
Exhibit 11 Claim chart for U.S. Patent No.	10	deposition of Peter T. Keith taken by counsel
RE45,380, also marked as	11	for the defendant in the matter of Vascular
Exhibit M to Mr. Keith's	12	Solutions, LLC, et al. versus Medtronic,
declaration 96	13	Incorporated, et al., filed in the United States
Exhibit 12 Claim chart for U.S. Patent No.	14	District Court, District of Minnesota, Court
RE45,776, also marked as	15	File Number 0:19-CV-1760 PJS/TNL. This
Exhibit N to Mr. Keith's	16	deposition is being held at Fredrikson & Byron
declaration 143	17	in Minneapolis, Minnesota.
Exhibit 13 Claim chart for U.S. Patent No.	18	My name is Adam Wallin from the firm
RE47.379, also marked as		Veritext, and I'm the videographer. The court
		reporter is Rebecca Klanderud from Veritext.
		Will counsel please identify
		themselves for the record?
		MR. NIEDERLUECKE: Kurt Niederluech
		from Fredrikson & Byron on behalf of the
case, uated 10/2/19 187		Medtronic defendants.
	25	
		Page
		MS. MYERS: Laura Myers from
		Fredrikson & Byron also on behalf of Medtronic
	-	defendants.
		MR. MORTON: This is Cyrus Morton
Exhibit P to Mr. Keith's		from Robins Kaplan. I also represent Medtronic.
declaration 201	-	MR. WINKELS: On behalf of the
Exhibit 16 Declaration of Peter T. Keith in	7	plaintiffs, Joe Winkels and Derek Vandenburgh
Support of Defendants' Opposition	8	with Carlson Caspers. And we've got Ken Levitt
to Plaintiff's Motion for Summary	9	with the Dorsey Firm and Greg Smock.
Judgment and Defendants'	10	THE VIDEO TECHNICIAN: Will the con
Cross-Motion for Summary Judgment	11	reporter please swear in the witness?
in the QXMédical vs. Vascular	12	* * *
Solutions, LLC, et al. case 215	13	PETER T. KEITH,
Exhibit 17 Demonstrative exhibit titled	14	a witness in the above-entitled matter,
"Straw Side Views" 276	15	having been first duly sworn,
* * *	16	testified on his oath as follows:
	17	* * *
	18	EXAMINATION
		* * *
		BY MR. NIEDERLUECKE:
	-	Q. Good morning, Mr. Keith.
		A. Good morning.
		Q. Mr. Keith, I understand that you are
		here today in your capacity as an expert witness
		in this case; is that correct?
	Counsel, Mr. Niederlueck91Exhibit 11 Claim chart for U.S. Patent No.RE45,380, also marked asExhibit M to Mr. Keith'sdeclaration96Exhibit 12 Claim chart for U.S. Patent No.RE45,776, also marked asExhibit N to Mr. Keith'sdeclaration143Exhibit 13 Claim chart for U.S. Patent No.RE47,379, also marked asExhibit 13 Claim chart for U.S. Patent No.RE47,379, also marked asExhibit 14 Order in the QXMédical vs.Vascular Solutions, LLC, et al.case, dated 10/2/19187Page 7EXHIBITS (continued):MEDTRONIC EXHIBITS:PAGE MARKEDExhibit 15 Claim chart for U.S. Patent No.RE45,760, also marked asExhibit 15 Claim chart for U.S. Patent No.RE45,760, also marked asExhibit 16 Declaration of Peter T. Keith inSupport of Defendants' Oppositionto Plaintiff's Motion for SummaryJudgment and Defendants'Cross-Motion for Summary Judgmentin the QXMédical vs. VascularSolutions, LLC, et al. case215Exhibit 17 Demonstrative exhibit titled"Straw Side Views"276	Counsel, Mr. Niederlueck919Exhibit 11 Claim chart for U.S. Patent No.10RE45,380, also marked as11Exhibit M to Mr. Keith's12declaration9613Exhibit 12 Claim chart for U.S. Patent No.14RE45,776, also marked as15Exhibit N to Mr. Keith's16declaration14317Exhibit 13 Claim chart for U.S. Patent No.18RE47,379, also marked as19Exhibit 14 Order in the QXMédical vs.22Vascular Solutions, LLC, et al.23case, dated 10/2/191872425Exhibit 15 Claim chart for U.S. Patent No.3RE45,760, also marked as24EXHIBITS (continued):1MEDTRONIC EXHIBITS:PAGE MARKED22Exhibit 15 Claim chart for U.S. Patent No.3RE45,760, also marked as4Exhibit P to Mr. Keith's5declaration20166Exhibit 16 Declaration of Peter T. Keith in7Support of Defendants' Opposition8to Plaintiff's Motion for Summary9Judgment and Defendants'10Cross-Motion for Summary Judgment11in the QXMédical vs. Vascular12Solutions, LLC, et al. case215Exhibit 17 Demonstrative exhibit titled14"Straw Side Views"276* * *16

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	Page 1	D C	Page 12
1	A. Yes.	1	some information in my report on that. I don't
2	Q. And who are you retained by?	2	recall it exactly right now
3	A. Uh, by, uh, the plaintiffs.	3	Q. Okay.
4	Q. Okay. The plaintiffs are the group I	4	A but I did bring a copy of my
5	presume?	5	report (witness indicating).
6	A. Yes.	6	Q. And I will mark it, and you're
7	Q. Okay. Mr. Keith, I'm going to hand	7	welcome if if you feel the need to look at
8	you what's been marked as Medtronic Exhibits 1	8	it.
9	through 5.	9	A. Yeah, I mean because that might
10	MR. NIEDERLUECKE: And for record,	10	clarify that. I'm not sure
11	Exhibit 1 is U.S. Patent 8,048,032; Exhibit 2 is	11	Q. Sure.
12	U.S. Reissued 45,380; Exhibit 3 is U.S. Reissued	12	A if it does exactly but
12	45,776; Exhibit 4 is U.S. Reissue 47,379, and	13	Q. Okay. Why don't we go ahead. In
13	Exhibit Number 5 is U.S. Reissue 47,579, and	14	fact, I've got a copy of your report right here.
14	BY MR. NIEDERLUECKE:	14	MR. NIEDERLUECKE: Why don't we ma
15 16	Q. And did I did I read those	15	that as Exhibit 6?
		17	* * *
17	accurately?		
18	A. I think so, yes.	18	(Whereupon, Deposition Exhibit 6 was
19	Q. Okay. And, um, does it appear to you	19	marked for identification.)
20	that those are the patents related to this	20	
21	matter?	21	MR. WINKELS: And just for the
22	A. Um, yes.	22	record, so Exhibit 6 does not include the
23	Q. And those are the, to your	23	exhibits, right?
24	understanding, the five patents that the	24	MR. NIEDERLUECKE: Yes.
25	plaintiffs have asserted that Medtronic is	25	BY MR. NIEDERLUECKE:
	Page 1	1	Page 13
-			
1	infringing?	1	Q. This is this is your report, and
2	A. Yes.	2	Q. This is this is your report, and I'll mark different exhibits individually, but
2 3	A. Yes.Q. Who owns the and I'll if you	2 3	Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the
2 3 4	A. Yes.Q. Who owns the and I'll if you don't mind, I'll refer to those as the	2 3 4	Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits.
2 3	A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay?	2 3	Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the
2 3 4	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. 	2 3 4	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm
2 3 4 5	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. Q. Who do you understand owns the 	2 3 4 5	Q. This is this is your report, andI'll mark different exhibits individually, butthis is for the record your report without theattached exhibits.A. Okay.
2 3 4 5 6	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. 	2 3 4 5 6	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm
2 3 4 5 6 7	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. Q. Who do you understand owns the 	2 3 4 5 6 7	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm for us that Exhibit 6 is is indeed the report
2 3 4 5 6 7 8	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. Q. Who do you understand owns the patents-in-suit? 	2 3 4 5 6 7 8	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm for us that Exhibit 6 is is indeed the report that you submitted and signed on October 10th,
2 3 4 5 6 7 8 9	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. Q. Who do you understand owns the patents-in-suit? A. I believe they're owned by Vascular 	2 3 4 5 6 7 8 9	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm for us that Exhibit 6 is is indeed the report that you submitted and signed on October 10th, 2019?
2 3 4 5 6 7 8 9 10	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. Q. Who do you understand owns the patents-in-suit? A. I believe they're owned by Vascular Solutions. 	2 3 4 5 6 7 8 9 10	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm for us that Exhibit 6 is is indeed the report that you submitted and signed on October 10th, 2019? A. Yes. It appears to be.
2 3 4 5 6 7 8 9 10 11	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. Q. Who do you understand owns the patents-in-suit? A. I believe they're owned by Vascular Solutions. Q. So you think Vascular Solutions, the company, owns them? 	2 3 4 5 6 7 8 9 10 11	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm for us that Exhibit 6 is is indeed the report that you submitted and signed on October 10th, 2019? A. Yes. It appears to be. Q. Okay. And and you provided this report in support of the plaintiffs' Motion For
2 3 4 5 6 7 8 9 10 11 12 13	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. Q. Who do you understand owns the patents-in-suit? A. I believe they're owned by Vascular Solutions. Q. So you think Vascular Solutions, the company, owns them? A. Well, and I I mean Vascular 	2 3 4 5 6 7 8 9 10 11 12	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm for us that Exhibit 6 is is indeed the report that you submitted and signed on October 10th, 2019? A. Yes. It appears to be. Q. Okay. And and you provided this report in support of the plaintiffs' Motion For Preliminary Injunction; is that correct?
2 3 4 5 6 7 8 9 10 11 12 13 14	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. Q. Who do you understand owns the patents-in-suit? A. I believe they're owned by Vascular Solutions. Q. So you think Vascular Solutions, the company, owns them? A. Well, and I I mean Vascular Solutions is part of Teleflex Medical, so 	2 3 4 5 6 7 8 9 10 11 12 13 14	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm for us that Exhibit 6 is is indeed the report that you submitted and signed on October 10th, 2019? A. Yes. It appears to be. Q. Okay. And and you provided this report in support of the plaintiffs' Motion For Preliminary Injunction; is that correct? A. Yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. Q. Who do you understand owns the patents-in-suit? A. I believe they're owned by Vascular Solutions. Q. So you think Vascular Solutions, the company, owns them? A. Well, and I I mean Vascular Solutions is part of Teleflex Medical, so Q. And so what I'm asking is who do you understand what entity actually owns the patents? A. I guess I don't know for sure. Q. Okay. Do you know what entity has 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm for us that Exhibit 6 is is indeed the report that you submitted and signed on October 10th, 2019? A. Yes. It appears to be. Q. Okay. And and you provided this report in support of the plaintiffs' Motion For Preliminary Injunction; is that correct? A. Yes. Q. And so, um, I think we were asking the question about the exclusive rights to sell under the patent, and I asked you whether you were aware what entity holds the exclusive rights to sell under the patent, um, and I think
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. Q. Who do you understand owns the patents-in-suit? A. I believe they're owned by Vascular Solutions. Q. So you think Vascular Solutions, the company, owns them? A. Well, and I I mean Vascular Solutions is part of Teleflex Medical, so Q. And so what I'm asking is who do you understand what entity actually owns the patents? A. I guess I don't know for sure. Q. Okay. Do you know what entity has the exclusive rights in the patent? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm for us that Exhibit 6 is is indeed the report that you submitted and signed on October 10th, 2019? A. Yes. It appears to be. Q. Okay. And and you provided this report in support of the plaintiffs' Motion For Preliminary Injunction; is that correct? A. Yes. Q. And so, um, I think we were asking the question about the exclusive rights to sell under the patent, and I asked you whether you were aware what entity holds the exclusive rights to sell under the patent, um, and I think you suggested you would like to look take a
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. Yes. Q. Who owns the and I'll if you don't mind, I'll refer to those as the patents-in-suit, okay? A. Yes. Q. Who do you understand owns the patents-in-suit? A. I believe they're owned by Vascular Solutions. Q. So you think Vascular Solutions, the company, owns them? A. Well, and I I mean Vascular Solutions is part of Teleflex Medical, so Q. And so what I'm asking is who do you understand what entity actually owns the patents? A. I guess I don't know for sure. Q. Okay. Do you know what entity has the exclusive rights in the patent? A. Um, I'm not sure. 	$ \begin{array}{c} 2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\end{array} $	 Q. This is this is your report, and I'll mark different exhibits individually, but this is for the record your report without the attached exhibits. A. Okay. Q. If you just take a look and confirm for us that Exhibit 6 is is indeed the report that you submitted and signed on October 10th, 2019? A. Yes. It appears to be. Q. Okay. And and you provided this report in support of the plaintiffs' Motion For Preliminary Injunction; is that correct? A. Yes. Q. And so, um, I think we were asking the question about the exclusive rights to sell under the patent, and I asked you whether you were aware what entity holds the exclusive rights to sell under the patent, um, and I think you suggested you would like to look take a look at your report in case that would refresh,
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1	Page 14	1	Page
1	helps to clarify that	$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$	Teleflex owns Vascular Solutions?
2	Q. Okay.	$\begin{vmatrix} 2 \\ 2 \end{vmatrix}$	A. I that's my guess. Again, I don't
3	A in this report.	3	know the exact arrangement as far as the
4	Q. So as you testify today, you don't	4	corporate relationships go (witness indicating).
5	know who has the exclusive rights to sell under	5	Q. I'm going to hand you what's been
6	the patents-in-suit, correct?	6	marked as Medtronic Exhibit Number 7.
7	A. Correct.	7	Can you take a look at that and
8	Q. Do you know what entity actually	8	and tell me if you recognize this document?
9	sells the GuideLiner your let me step	9	A. I don't think I've seen this
10	back.	10	document.
11	You're familiar with a product called	11	Q. Does it appear to you to be a
12	the GuideLiner?	12	brochure for the GuideLiner V3 catheter?
13	A. Yes.	13	A. It does appear to be that, yes.
14	Q. Um, and the GuideLiner has had	14	Q. And on the front page, um, what
15	different versions, V1 through V3.	15	entity do you see or or what name do you see
16	Is that right?	16	as a as a tradename on the document?
17	A. Yes.	17	A. Uh, Teleflex.
18	Q. Okay. Do you know who actually	18	Q. And on this document, can you take a
19	currently sells the GuideLiner V3 catheter?	19	look at it and see if you see Vascular Solutions
20	A. I believe it's Vascular Solutions.	20	identified anywhere in this brochure?
21	MR. NIEDERLUECKE: Can we have this	21	A. Um, I do not see it.
22	marked?	22	Q. So at least based on this Exhibit 7,
23	* * *	23	which appears to be a brochure for the
24	(Whereupon, Deposition Exhibit 7 was	24	GuideLiner V3, it appears that Teleflex and not
25	marked for identification.)	25	VSI is selling the GuideLiner V3 catheter,
	Page 15		Page
1	* * *	1	correct?
2	MR. NIEDERLUECKE: And here, hold	2	MR. WINKELS: Objection, lack of
3	on.	3	foundation.
4	BY MR. NIEDERLUECKE:	4	THE WITNESS: Again, I don't
5	Q. And what do you base your belief that	5	understand the whole corporate relationship
6	Vascular Solutions sells the GuideLiner V3	6	between Teleflex and Vascular Solutions. The
7	product?	7	document says Teleflex, um, so that's as much as
8	On what do you base that?	8	I know about that.
9	A. Um, well, I I understand there's	9	BY MR. NIEDERLUECKE:
10	Vascular Solutions as a company, I know there	10	Q. Why did you choose to refer to the
11	was some sort of an acquisition or a corporate,	11	group of entities in this case as as Vascular
12	um, (witness indicating) transaction with	12	Solutions?
13	Teleflex Medical. Um, I don't know all the	13	A. Um, again, that's when I became
14	details of what that arrangement might be but	14	involved in this, it was Vascular Solutions.
15	even prior to Teleflex, when it was Vascular	15	Um, that was the name on the building, um, so
16	Solutions, and I have been involved in both this	16	that's how I've referred to them and I I have
	solutions, and I have been involved in both tills	17	continued to refer to them mostly as Vascular
	proceeding with Medtronic as well as a	11/	•
17	proceeding with Medtronic, as well as a proceeding with OXMédical so I have been		Nolutions
17 18	proceeding with QXMédical, so I have been	18	Solutions.
17 18 19	proceeding with QXMédical, so I have been working with Vascular Solutions for some time,	18 19	Q. And when did you first become
17 18 19 20	proceeding with QXMédical, so I have been working with Vascular Solutions for some time, um, that I believe that it was just Vascular	18 19 20	Q. And when did you first become involved with Vascular Solutions?
17 18 19 20 21	proceeding with QXMédical, so I have been working with Vascular Solutions for some time, um, that I believe that it was just Vascular Solutions when I first became involved, um, but	18 19 20 21	Q. And when did you first become involved with Vascular Solutions?A. I don't recall exactly. Sometime
17 18 19 20 21 22	proceeding with QXMédical, so I have been working with Vascular Solutions for some time, um, that I believe that it was just Vascular Solutions when I first became involved, um, but I don't know exactly what dates that the	18 19 20 21 22	Q. And when did you first become involved with Vascular Solutions?A. I don't recall exactly. Sometime during the QXMédical litigation.
17 18 19 20 21 22 23	proceeding with QXMédical, so I have been working with Vascular Solutions for some time, um, that I believe that it was just Vascular Solutions when I first became involved, um, but I don't know exactly what dates that the corporate transaction with Teleflex took place	18 19 20 21 22 23	Q. And when did you first become involved with Vascular Solutions?A. I don't recall exactly. Sometime during the QXMédical litigation.Q. Was it prior to 2019?
17 18 19 20 21 22	proceeding with QXMédical, so I have been working with Vascular Solutions for some time, um, that I believe that it was just Vascular Solutions when I first became involved, um, but I don't know exactly what dates that the	18 19 20 21 22	Q. And when did you first become involved with Vascular Solutions?A. I don't recall exactly. Sometime during the QXMédical litigation.

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