

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 _____
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4 _____
5 YITA, LLC
6 Petitioner,

7 v.

8 MACNEIL, IP LLC,
9 Patent Owner,

10 Case IPR2020-01142
11 Patent 8,833,834

12 ORAL VIDEOTAPED DEPOSITION

13 DAN PERREAULT

14 SEPTEMBER 15, 2021

15
16 ORAL VIDEOTAPED DEPOSITION OF DAN PERREAULT, via
17 Zoom, produced as a witness at the instance of the
18 Patent Owner and duly sworn, was taken in the
19 above-styled and numbered cause on September 15, 2021,
20 from 9:59 a.m. to 1:27 p.m. EST, before Melinda Barre,
21 Certified Shorthand Reporter in and for the State of
22 Texas, reported by computerized stenotype machine, all
23 parties appearing remotely via web videoconference,
24 pursuant to the rules of procedure and the provisions
25 stated on the record or attached hereto.

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APPEARANCES
(ALL APPEARED VIA ZOOM VIDEO CONFERENCE.)

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1 THE VIDEOGRAPHER: We are on the record on
2 September 15, 2021 at approximately 9:59 a.m. Eastern
3 Time for the remote video deposition of Mr. Dan
4 Perreault in the matter of Yita, LLC versus MacNeil IP,
5 LLC. My name is Bryan Beltran, and I'm the videographer
6 and document tech.

7 Will counsel please introduce themselves
8 for the record beginning with the party noticing this
9 proceeding.

10 MR. WILLE: This is David Wille with Baker
11 Botts for the patent owner.

12 MR. FITZSIMMONS: And this is Jason
13 Fitzsimmons with Sterne, Kessler, Goldstein & Fox for
14 the petitioner, Yita, LLC.

15 THE VIDEOGRAPHER: Thank you. Will the
16 court reporter please swear in the witness.

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1 DAN PERREAULT,
2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 QUESTIONS BY MR. WILLE:

5 Q. Please state your name.

6 A. Dan Perreault.

7 Q. And, Mr. Perreault, you are here today to give
8 expert testimony on behalf of Yita, LLC, correct?

9 A. Correct.

10 Q. Have you ever had your deposition taken before?

11 A. No.

12 Q. Do you understand the court reporter can only
13 take down what one of us is saying at a time?

14 A. Yes.

15 Q. Okay. So please let me finish my question
16 before you start your answer, and I'll try to let you
17 finish your answer before I begin my next question. Can
18 we agree to that?

19 A. Yes.

20 Q. Anything that would prevent you from giving
21 full, complete and accurate testimony today?

22 A. No.

23 Q. Okay. What is your hourly rate in this matter?

24 A. \$225.

25 Q. And are you receiving any compensation besides

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