

Re: Deposition of **Ryan Granger**

Date: 7/1/2021

Case: Yita L.L.C. -v- MacNeil IP L.L.C. (PTAB)

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| Page | Line | Correction/Change and Reason | |
|----------|-----------|--|---|
| 10 | 4 | “deposition” should be “declaration” | I misspoke |
| 15 | 19 | “chop” should be “shop” | Transcription error (TE) |
| 31 32 | 16- 1 | Add to end of answer, “We consistently meet those standards other than when a manufacturer builds vehicles with significant variations in the shape or dimensions of their footwells. Those tolerances are better than the standard for close conformance set forth in the ‘186 Patent.” | Clarification |
| 38 | 10 | “Line 41” should be “Paragraph 41” | I misspoke |
| 39 | 11- 12 | Replace answer with, “I think I stated that 95 percent of the SKUs at least meet one of the claims with respect to the ‘834 Patent. That is what I said in Paragraph 42 of my declaration. I also said that 100% of WeatherTech’s floor liners meet Claim 1 of the ‘186 Patent.” | Clarification. The question was confusing because it mixes up what I said in my declaration about the ‘186 Patent with what I said about the ‘834 Patent. |
| 39 | 18- 19 | Replace answer with “I mean it meets at least one of our claims in the ‘834 Patent. That is the patent for which I said in my declaration that 95% of the SKUs meet at least one of the claims.” | Clarification. The question continues the confusion from a prior question. As I note in the correction above, that question was confusing because it mixes up what I said in my declaration about the ‘186 Patent with what I |

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| | | | said about the '834 Patent. |
| 40 | 9-12 | Replace answer with, "In my opinion, at least 95 percent of the SKUs or models of the WeatherTech FloorLiner floor tray product line molded between 2004 and now meet at least one of the tolerance requirements of the '834 Patent Claims 1, 5, and 9 as stated in Paragraphs 43-44 of my declaration. My opinion with respect to the '186 Patent is that 100% of WeatherTech's floor liners meet Claim 1 of the '186 Patent as stated in Paragraph 42 of my declaration." | Clarification. Again, the question was confusing because it mixes up what I said in my declaration about the '186 Patent with what I said about the '834 Patent. When I asked for the attorney to point me to where I talked about 95% in my declaration, he pointed me to Paragraph 44 that is talking about the tolerance requirements of Claims 1, 5, and 9 of the '834 Patent as discussed in Paragraph 43 of my declaration. So the attorney was apparently asking a question about the '186 Patent Claim 1 but pointed me to a paragraph in my declaration where I was talking about the '834 Patent. |
| 40 | 17-18 | Replace answer with, "Correct. As it stated there in Paragraph 44, at least one of the tolerance requirements. That is all I am talking about in that paragraph. However, in Paragraph 42, I note that 95% | Clarification. The question is confusing. It is not clear if it is asking me about what is being said in paragraph 44 |

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| | | of the SKUs will be covered by at least one of Claims 1, 5, and 9 of the '834 Patent.” | (which is how I interpreted the question) or asking me about my opinion in general. I clarified my answer to address either possibility. |
| 46 | 4 | Replace answer with “Forty-Nine out of fifty, meaning 98%” | Clarification. The question asked for a percentage and I gave an absolute value. |
| 55 | 6 | “charge” should be “large” | TE |
| 61 | 3 | “Meso” should be “Ezzo” | TE |
| 65 | 7 | “120” should be “0.120” | Clarification |
| 125 | 12-16 | “bearing” should be “varying” Add to the end of the answer: “To be clear, the walls are going to be somewhat thinner than the original sheet thickness as a person skilled in the art would expect with any thermoforming process.” | TE Clarification |
| 128 | 7-10 | “obviously” should be “obvious” | TE |
| 128 | 21-22 | Add to end of answer, “What I mean by that is that it will depend upon what the person knows about thermoforming. Any person of ordinary skill in the art looking at the WeatherTech products would conclude that for the portions of the trays that the patent claims require to be uniformly thick that they are uniformly | Clarification |

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| | | thick just by looking at them. It is obvious to a person skilled in the art that nothing was done to make the part thicker or thinner in those locations and that any small variations are typical of the thermoforming process.” | |
| 167 | 17-19 | Add to end of answer, “Another reason I am certain of that is that the VIN number on the VIN plate matches the VIN number that is stamped into a component of the vehicle—specifically a sheet metal part inside of the engine compartment.” | Clarification |
| 191 | 20-21 | Add to end of answer, “When you use the term “match” I am not sure how you are using the term. One part of the confusion is that the drawings show a floor tray and the scan shows a footwell. They are not supposed to “match” The floor tray is supposed to fit inside of the footwell of a Lada Niva. Another point of confusion is that it is not clear if you are asking about dimensions. As I stated in my declaration in paragraph 114, Rabbe recites no dimensions for his floor trays. So it is not possible to match the heights of an undimensioned drawing to a scan. But as I also stated in my declaration, one can obviously see the overall proportions and shapes of Rabbe’s trays from his drawings. It is obvious when looking at those drawings that the floor trays in the drawings were designed for a Lada Niva based upon the overall proportions and | Clarification |

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| | | shapes of the drawings as compared to my scans. | |
| 192 | 13 | “scans” should be “floor trays” | I misspoke |
| 193 | 14 | “isn’t” should be “is” | Either TE or I misspoke as the remainder of my answer makes clear. |
| 194 195 | 21- 2 | Add to answer, “I want to be clear that what I compared in my analysis was the shapes of the Lada Niva footwell (as illustrated by the scans) to the shapes of the Rabbe floor trays (as illustrated by the scans). I view that as different than comparing a drawing to a scan. Also, the drawing is at a specific profile angle of 45 degrees and it would have been very difficult to get a scan that was oriented at the exact same angle.” | Clarification |
| 202 | 9 | “Womac” should be “Womack” | TE |
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