			3
	1	08:55:56	1 PROCEEDINGS
	1 UNITED STATES PATENT AND TRADEMARK OFFICE	08:55:56	2 THE VIDEOGRAPHER: We are on video.
	2	08:56:08	3 THE REPORTER: We are on the record.
	3 BEFORE THE PATENT TRIAL AND APPEAL BOARD		4 Before I swear the witness I would like to state for
	4		5 the record it is my understanding there is no
	5 MEDTRONIC, INC., AND, MEDTRONIC VASCULAR, INC.,		6 objection to swearing the witness remotely. Please
	Petitioner, 6 v.		7 speak up only if you have an objection.
	7 Teleflex life sciences limited,		8 Hearing none; Mr. Erb, would you raise your
	8 Patent Owner.		9 right hand to be sworn?
	9 Case No. IPR2020-01341	1	0 (Witness sworn.)
	10 Case No. IPR2020-01342 Case No. IPR2020-01343	1	1 STEVEN J. ERB,
	11 Case No. IPR2020-01344 U.S. Patent No. 8,142,413	1	2 Called as a witness, being first
	12	1	duly sworn, was examined and
	13 DEPOSITION OF STEVEN J. ERB	1	4 testified as follows:
	14 VOLUME I, PAGES 1 - 43	1	5 EXAMINATION
	15 JULY 22, 2021 16	1	6 BY MS. TREMBLAY:
	17	08:56:38	7 Q. Good morning, Mr. Erb. My name is Emily
	18 (The following is the deposition of STEVEN	08:56:42	
	 J. ERB, taken pursuant to Notice of Taking 	08:56:45	
	20 Deposition, conducted remotely and via videotape,	08:56:49 2	20 Vascular, Inc.
	21 commencing at approximately 8:55 o'clock a.m., July	08:56:49 2	You've given a deposition before; is that
	22 22, 2021.)	08:56:52 2	22 correct, Mr. Erb?
	23	08:56:53 2	23 A. Correct.
	24	08:56:55 2	Q. And actually the deposition that you've
	25	08:56:57 2	25 given before, it was for a related proceeding
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	1-800-553-1953 info@stirewalt.com		1-800-553-1953 info@stirewalt.com
	2 2		4
1 2	APPEARANCES: On Behalf of the Petitioner:	08:57:00	1 involving Medtronic and Teleflex; is that correct?
3	Emily Tremblay	08:57:03	2 A. That's correct.
4	ROBINS KAPLAN, LLP 2800 LaSalle Plaza	08:57:05	3 Q. And involving, in particular, the GuideLiner
_	800 LaSalle Avenue	08:57:08	4 invention which we're going to discuss today; correct?
5	Minneapolis, Minnesota 55402	08:57:11	5 A. Correct.
6	On Behalf of the Patent Owner:	08:57:14	6 Q. So given that we've been here before, I'm
7	Alex S. Rinn	08:57:16	7 going to skip some of the introductory deposition
	Tara C. Norgard	08:57:19	8 rules, but please speak up if you have any questions
8	CARLSON CASPERS VANDENBURGH & LINDQUIST, P.A.	08:57:22	9 as we go. If you don't understand my question, please
9	4200 Capella Tower	08:57:25	0 ask me to rephrase. We will be taking breaks, but if
10	225 South Sixth Street Minneapolis, Minnesota 55402	08:57:30 1	1 you'd like one before I call for one, please speak up
		08:57:33 1	2 and we'll accommodate.
11	ALSO PRESENT:	08:57:36	3 Now is there any reason that you will not be
12	Jacob A. Arvold, Videographer	08:57:38 1	4 able to understand my questions and answer truthfully
13	Greg Smock, Teleflex	08:57:41 1	. , ,
	EXAMINATION INDEX	08:57:43	
14	WITNESS EXAMINED BY PAGE Mr. Erb Ms. Tremblay 3,39	08:57:45 1	7 Q. Great.
15	Mr. Rinn 35,40	08:57:46	, ,
16		08:57:48 1	
17		08:57:50 2	, , , , ,
18 19		08:57:54 2	
20		08:57:57 2	
21 22		08:57:59 2	, ,, ,, ,
23		08:58:02 2	
24 25		08:58:04 2	
20	STIREWALT & ASSOCIATES		STIREWALT & ASSOCIATES
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		5			7
08:58:10 1	I did rea	ad over the the last deposition, too. I	09:00:28	1	A. It's the Declaration of Steven Erb.
08:58:15 2	read that		09:00:32	2	Q . So this is your declaration; is that
08:58:18 3		The "last deposition" that one of my	09:00:34	3	correct?
08:58:20 4		es took in the related proceedings, that's	09:00:35	4	A. That is correct.
08:58:23 5		J're referring to?	09:00:38	5	Q. Did you speak with anyone, other than your
08:58:24 6	A.	Correct, yeah. I think it was back in May.	09:00:40	6	attorneys, to prepare Exhibit 2122?
08:58:29 7	Q.	Did you review any documents other than your	09:00:45	7	A. No, I did not.
08:58:32		on to prepare for today, and other than the	09:00:49	8	Q. And Mr. Erb, you submitted a previous
08:58:35 9		on transcript that you referenced?	09:00:52	9	declaration in the related proceedings involving
08:58:37 10	A .	Yes, there were a few prints and a a few	09:00:56		Medtronic and Teleflex and GuideLiner; is that
08:58:41 11	POs.		09:00:59		correct?
08:58:43 12	Q.	Just for the record, by "prints" are you	09:01:00		A. Correct.
08:58:46 13		to engineering drawings, or something else?	09:01:03		Q. And you gave a deposition related to that
08:58:49 14	A.	Yeah, maybe engineering drawings,	09:01:05		first declaration; true?
08:58:53 15	blueprir		09:01:07		A. Correct.
08:58:53 16	Q.	And by "POs," are you referring to purchase	09:01:10		Q. So is Exhibit 2122 that you have in front of
08:58:56 17	orders?	······································	09:01:13		you now, is that the same as your first declaration?
08:58:58 18	A.	Okay. Excuse me. I got a	09:01:19		A. It's very similar. I think we did change a
08:59:01 19		Can you hear that? I don't know what that	09:01:24		few or clarify a few sentences.
08:59:03 20	is. I'm	-	09:01:31	20	Q. Okay. Do you remember which portions of
08:59:07 21	Q.	Debby or Jacob, are you getting background	09:01:34	21	this declaration were clarified or changed compared to
08:59:09 22	interfere	nce? Or Mr. Erb, are you getting background	09:01:40	22	your first declaration?
08:59:12 23	interfere	nce?	09:01:42	23	A. No, I did I do not. I did did not
08:59:13 24	Α.	Yeah, I was, okay. So I I I shut it	09:01:44	24	compare.
08:59:14 25	off so it	's It's fine, I guess.	09:01:45	25	Q. Okay. That's fine. As we walk through it,
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		1-800-553-1953 info@stirewalt.com			1-800-553-1953 info@stirewalt.com
		6			8
	~			4	
08:59:14 1	Q.	Okay.	09:01:48	1	I I'm I'll be in a position to represent to you
08:59:14 1 08:59:16 2	Q. A.	Sorry about that.	09:01:48 09:01:51	2	I I'm I'll be in a position to represent to you what's been changed from your first declaration.
•		•		-	
08:59:16 2	А.	Sorry about that.	09:01:51	2	what's been changed from your first declaration.
08:59:16 2 08:59:17 3	A. Q.	Sorry about that. And so	09:01:51 09:01:53	2 3	what's been changed from your first declaration. A. Okay.
08:59:16 2 08:59:17 3 08:59:18 4	A. Q. more tim	Sorry about that. And so No problem. I'm just going to clarify one	09:01:51 09:01:53 09:01:57	2 3 4	what's been changed from your first declaration. A. Okay. Q. Do you know
08:59:16 2 08:59:17 3 08:59:18 4 08:59:20 5 08:59:22 6 08:59:24 7	A. Q. more tim	Sorry about that. And so No problem. I'm just going to clarify one ne. So when you reference "POs," are you to purchase orders? Yes.	09:01:51 09:01:53 09:01:57 09:01:58	2 3 4 5 6 7	 what's been changed from your first declaration. A. Okay. Q. Do you know So the changes that you made, do you know
08:59:16 2 08:59:17 3 08:59:18 4 08:59:20 5 08:59:22 6	A. Q. more tim referring	Sorry about that. And so No problem. I'm just going to clarify one ne. So when you reference "POs," are you to purchase orders?	09:01:51 09:01:53 09:01:57 09:01:58 09:02:00	2 3 4 5 6	 what's been changed from your first declaration. A. Okay. Q. Do you know So the changes that you made, do you know why you changed material between your first
08:59:16 2 08:59:17 3 08:59:18 4 08:59:20 5 08:59:22 6 08:59:24 7 08:59:27 8 08:59:32 9	A. Q. more tim referring A. Q. purchase	Sorry about that. And so No problem. I'm just going to clarify one ne. So when you reference "POs," are you to purchase orders? Yes. Okay. So you reviewed some prints and some e orders; any other documents that you reviewed	09:01:51 09:01:53 09:01:57 09:01:58 09:02:00 09:02:03 09:02:06 09:02:08	2 3 4 5 6 7 8 9	 what's been changed from your first declaration. A. Okay. Q. Do you know So the changes that you made, do you know why you changed material between your first declaration and this declaration? A. I think it was just to to make everything more complete, more understandable.
08:59:16 2 08:59:17 3 08:59:18 4 08:59:20 5 08:59:22 6 08:59:24 7 08:59:27 8 08:59:32 9 08:59:35 10	A. Q. more tim referring A. Q. purchase to prepa	Sorry about that. And so No problem. I'm just going to clarify one e. So when you reference "POs," are you to purchase orders? Yes. Okay. So you reviewed some prints and some e orders; any other documents that you reviewed re for today?	09:01:51 09:01:53 09:01:57 09:02:00 09:02:03 09:02:06 09:02:08 09:02:14	2 3 4 5 6 7 8 9 10	 what's been changed from your first declaration. A. Okay. Q. Do you know So the changes that you made, do you know why you changed material between your first declaration and this declaration? A. I think it was just to to make everything more complete, more understandable. Q. To make it more complete. So did you speak
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08:59:16 2 08:59:17 3 08:59:18 4 08:59:20 5 08:59:22 6 08:59:24 7 08:59:25 10 08:59:32 9 08:59:37 11 08:59:39 12 08:59:39 12 08:59:43 13 08:59:45 16 08:59:52 17 09:00:04 18 09:00:06 20	A. Q. more tim referring A. Q. purchase to prepa A. Q. of docum A. Q. been ma A. Twenty Q.	Sorry about that. And so No problem. I'm just going to clarify one he. So when you reference "POs," are you to purchase orders? Yes. Okay. So you reviewed some prints and some e orders; any other documents that you reviewed re for today? No. Okay. So Mr. Erb, did you receive a packet hents for this deposition? Yes, I did. I have it here. Okay. Great. Could you please take out what's already rked as Exhibit 2122? Yeah. Can you please please repeat that?	09:01:51 09:01:53 09:02:57 09:02:00 09:02:03 09:02:03 09:02:04 09:02:24 09:02:21 09:02:23 09:02:23 09:02:32 09:02:34 09:02:34 09:02:34 09:02:34	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 what's been changed from your first declaration. A. Okay. Q. Do you know So the changes that you made, do you know why you changed material between your first declaration and this declaration? A. I think it was just to to make everything more complete, more understandable. Q. To make it more complete. So did you speak with anyone to refresh your recolle your recollection, excuse me, as to any material that you added for completeness? A. Well I think we just went over with with my attorneys and just, you know, as we went went through it, my memory was you know, had been jogged, so maybe I remembered a few more details. Q. Okay. So in these conversations where your memory was jogged, were you reviewing any additional documents that helped to jog your memory, do you
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	9		11
09:03:03 1	just briefly, you began working for Vascular	09:05:44 1	l also did some testing.
09:03:08 2	Solutions, Inc. or VSI in 2005; is that correct?	09:05:48 2	Q. And I believe when you mentioned Mr. Sutton
09:03:11 3	A. Correct.	09:05:50 3	and Mr. Root, I believe you said "from above." Are
09:03:13 4	Q. And you began working for VSI as a	09:05:54 4	you referring to their involvement as in a supervisory
09:03:16 5	technician in the Research and Development Group;	09:05:58 5	capacity, or could you could you clarify what you
09:03:19 6	correct?	09:06:00 6	mean by Sutton and Root were involved from above?
09:03:20 7	A. Yes.	09:06:04 7	A. Well they yeah, they were involved in
09:03:22 8	Q . I believe your declaration set forth that	09:06:06 8	testing or, you know, of the prototypes but, you know,
09:03:25 9	some of your responsibilities included machining	09:06:11 9	they would be the ones that, I guess, and I don't know
09:03:28 10	parts; is that correct?	09:06:15 10	what the correct term is, but would be directing, you
09:03:29 11	A. Yes.	09:06:18 11	know, they were always, you know, asking where
09:03:31 12	Q. And I believe it also included designing	09:06:20 12	where we are with that project. So I would call that
09:03:33 13	tools; true?	09:06:26 13	directing, or or you could call it supervising.
09:03:35 14	A. Yes.	09:06:32 14	Q. Do you know what I mean if I refer to an
09:03:37 15	Q. And I believe that in your declaration you	09:06:35 15	"over-the-wire" version of GuideLiner?
09:03:39 16	referenced assisting engineers; is that correct?	09:06:40 16	A. I'm familiar with the term, but I never
09:03:43 17	A. Repeat that.	09:06:44 17	really worked on that.
09:03:45 18	Q. I believe you also referenced that your job	09:06:48 18	Q. So the individuals that you just identified,
09:03:43 19	in 2005 at VSI involved assisting engineers; is that	09:06:51 19	Mr. Kauphusman, Mr. Welch, Mr. Sutton and Mr. Root,
09:03:52 20	correct?	09:06:55 20	they were you weren't speaking about work on an
09:03:53 21	A. That's correct.	09:06:59 21	over-the-wire version; is that correct? You were
09:03:55 22	Q. Anything else that would have been part of	09:07:02 22	speaking
09:03:57 23	your job as a technician in 2005/2006 that you'd like	09:07:02 23	A. No.
09:04:02 24	to add for completeness?	09:07:03 24	Q. about an
09:04:02 24	A. Yeah, I also procured materials or bought	09:07:05 25	Okay.
09.04.03 20	STIREWALT & ASSOCIATES	09.07.03 20	STIREWALT & ASSOCIATES
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	10		12
09:04:09 1	materials for prototype projects or, yeah, whatever w	09:07:05 1	A. Yes. Yeah, rapid exchange.
09:04:15 2	were working on.	09:07:07 2	Q. So So what
09:04:19 3	Q. Anything else?	09:07:09 3	Okay. Thank you.
09:04:20 4	A. That would probably be about it.	09:07:09 4	So we're talking when we're talking about
09:04:25 5	Q. So Mr. Erb, what is GuideLiner?	09:07:13 5	the GuideLiner project, from your perspective you're
09:04:30 6	A. It's a catheter, or it it's used as a	09:07:15 6	only talking about rapid exchange; is that is that
09:04:37 7	launching pad to launch a catheter further into the	09:07:19 7	correct?
09:04:40 8	body to, you know, get purchase so I can move a	09:07:19 8	A. Correct.
09:04:45 9	catheter further further out to deliver another	09:07:25 9	Q. Sorry, I'm not sure that I heard an answer
09:04:49 10	product.	09:07:26 10	to that. Is that correct, Mr
09:04:52 11	Q. And you worked on the GuideLiner project; is	09:07:28 11	A. Yes.
09:04:56 12	that correct?	09:07:29 12	Q Erb,
09:04:57 13	A. Yes.	09:07:29 13	A. Yes, it is.
09:04:58 14	Q. When did you begin working on GuideLiner?	09:07:31 14	Q. when we're talking about the GuideLiner
09:05:03 15	A. It would have been early 2005.	09:07:31 15	project?
09:05:07 16	Q. Do you remember who else was working on the	09:07:32 16	A. Yes, that is correct, rapid exchange.
09:05:10 17	project in 2005?	09:07:32 10 09:07:37 17	Q. Okay. I'd like to refer to paragraph 7 of
09:05:13 18	A. Yeah, there was Jim Kauphusman, Jeff Welcl		your declaration, still Exhibit 2122 that you should
09:05:20 19	and from above it would have been Gregg Sutton and	09:07:44 19	have in front of you.
09:05:20 19	Howard Root was was directing the project. I	09:07:44 13	A. All right.
09:05:24 20	And I suppose various technicians, too, for doing	09:07:46 20	Q. So here you're referring to ordering
09:05:28 21 09:05:31 22	testing.	09:07:46 21	stainless steel and nitinol hypotubes for GuideLiner;
09:05:31 22 09:05:35 23	Q. Were you one of the technicians involved in	09:07:51 22 09:07:56 23	correct?
09:05:35 23 09:05:37 24	testing, or did you have a separate role?	09:07:56 23 09:07:57 24	A. Correct.
09:05:37 24 09:05:41 25			
U9:U5:41 2 J	A. My main role was making prototypes, but I - STIPEWALT & ASSOCIATES	09:08:00 23	Q. And when you mention "hypotube" here, are
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		13				15
09:08:04 1	vou talking abou	stock hypotube, or hypotube that has	09:10:42	1	prototype	es; is that correct?
09:08:09 2		ed; is that correct?	09:10:44	2	A.	Yes.
09:08:12 3	A. Corre		09:10:47	3	Q.	And also in paragraph 11 you're talking
09:08:14 4	Q. What o	lid VSI do with those hypotube orders	09:10:49	4	about att	aching proximal and distal components; is
09:08:19 5	after they receiv		09:10:54	5	that corre	ect?
09:08:24 6	A. What	timeframe we talking? We talking	09:10:55	6	Α.	Correct.
09:08:26 7	about, okay, th	at the purchase order	09:10:58	7	Q.	Who performed that attachment work?
09:08:31 8	Q. Let's s	ay we're talking about 2005.	09:11:02	8	Α.	I would have done
09:08:33 9	A. Okay.		09:11:03	9		I would have done some of it, and then
09:08:34 10	Q. Early 2	005.	09:11:06	10	probably	y Jeff Welch.
09:08:35 11	A. Yeah.	I believe I would have machined some	09:11:10	11	Q.	Do you remember what Mr. Welch's position in
09:08:38 12	of those to what	tever wherever the print was at that	09:11:13	12	the comp	any was at the time?
09:08:43 13	time or at what	ever stage we were at. Other ones	09:11:15	13	Α.	Yes, he was R&D director.
09:08:46 14	might have bee	n sent to Spectralytics or LSA to be	09:11:24	14	Q.	Was that different from Mr. Sutton's role at
09:08:50 15	to be laser cut.		09:11:26	15	the time?	,
09:08:52 16	Q . Okay.	So we're talking about ordering stock	09:11:26	16	Α.	Yes, he was the vice president.
09:08:57 17	hypotube, not m	achined hypotube	09:11:30	17	Q.	Okay. So in paragraph 11, I just want to
09:08:59 18	A. Corre	et.	09:11:39	18	make sur	e I'm clear, we're talking about early
09:09:00 19	Q that	you would then machine in-house; is	09:11:41	19	GuideLine	er prototypes for which you machined hypotube;
09:09:02 20	that correct?		09:11:46	20	correct?	
09:09:02 21	A. Corre	ct. Correct.	09:11:47	21	Α.	Correct.
09:09:07 22	Q . So in p	aragraph 8 of your declaration,	09:11:49	22	Q.	And you and Mr. Welch were responsible for
09:09:10 23	Exhibit 2122, yo	ı you're talking about what you	09:11:53	23	the attac	hment work that you describe here.
09:09:14 24	call "early Guidel	iner prototypes"; is that correct?	09:11:56	24	Α.	Yes.
09:09:18 25	A. Yes.		09:12:00	25	Q.	Anyone else involved?
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						10
		14				16
09:09:21 1	Q. So wh	14 at are these early GuideLiner	09:12:02	1	Α.	16 Yes, there could have been other technicians
09:09:23 2	Q. So what prototypes?		09:12:02 09:12:04	2		
	prototypes? A. Yeah,	at are these early GuideLiner the proximal end would have been a		-	involvec	Yes, there could have been other technicians I, too, but I just I don't remember who they e at this time.
09:09:23 2 09:09:26 3 09:09:29 4	prototypes? A. Yeah, hypotube that	at are these early GuideLiner the proximal end would have been a cut down using the like using a	09:12:04	2 3 4	involvec would b Q.	Yes, there could have been other technicians I, too, but I just I don't remember who they e at this time. Moving to paragraph 12, so are we're
09:09:23 2 09:09:26 3 09:09:29 4 09:09:33 5	prototypes? A. Yeah, hypotube that milling machine	at are these early GuideLiner the proximal end would have been a cut down using the like using a e, cut down a portion of it to make it	09:12:04 09:12:07	2 3 4 5	involved would b Q. still talkir	Yes, there could have been other technicians I, too, but I just I don't remember who they e at this time. Moving to paragraph 12, so are we're ng about these same "early GuideLiner
09:09:23 2 09:09:26 3 09:09:29 4 09:09:33 5 09:09:38 6	prototypes? A. Yeah, hypotube that milling machine more flexible a	at are these early GuideLiner the proximal end would have been a cut down using the like using a e, cut down a portion of it to make it nd then leaving a a distal end that	09:12:04 09:12:07 09:12:14 09:12:19 09:12:22	2 3 4 5 6	involved would b Q. still talkin prototype	Yes, there could have been other technicians I, too, but I just I don't remember who they e at this time. Moving to paragraph 12, so are we're ag about these same "early GuideLiner es" in paragraph 12; is that correct?
09:09:23 2 09:09:26 3 09:09:29 4 09:09:33 5 09:09:38 6 09:09:41 7	A. Yeah, hypotube that milling machine more flexible a we could attack	at are these early GuideLiner the proximal end would have been a cut down using the like using a e, cut down a portion of it to make it	09:12:04 09:12:07 09:12:14 09:12:19 09:12:22 09:12:25	2 3 4 5 6 7	involvec would b Q. still talkin prototype A.	Yes, there could have been other technicians I, too, but I just I don't remember who they e at this time. Moving to paragraph 12, so are we're ng about these same "early GuideLiner es" in paragraph 12; is that correct? Correct.
09:09:23 2 09:09:26 3 09:09:29 4 09:09:33 5 09:09:38 6 09:09:41 7 09:09:44 8	A. Yeah, hypotube that milling machine more flexible a we could attack to it.	at are these early GuideLiner the proximal end would have been a cut down using the like using a e, cut down a portion of it to make it nd then leaving a a distal end that n attach the polymer polymer end	09:12:04 09:12:07 09:12:14 09:12:19 09:12:22 09:12:25 09:12:29	2 3 4 5 6 7 8	involvec would b Q. still talkin prototype A. Q.	Yes, there could have been other technicians I, too, but I just I don't remember who they e at this time. Moving to paragraph 12, so are we're g about these same "early GuideLiner es" in paragraph 12; is that correct? Correct. At this time we're discussing testing those
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	17		19
09:13:09 1		09:15:34 1	A. Yes. A heart model, benchtop model.
09:13:09 1 09:13:12 2	A. Well since we since we bonded the the two dissimilar materials, we would just test the	09:15:34 1 09:15:38 2	Q. Benchtop model. So who would have been
		•	
	integrity of the bond, so we would do a pull test to		involved in benchtop model testing?
09:13:19 4	make sure that that they were tightly bonded	09:15:45 4	A. I would have been a small bit, just to see,
09:13:22 5	together so that that wouldn't come apart.	09:15:48 5	more for my own use, but more more of it would
09:13:26 6	Q. So I'm not an engineer, so you'll have to	09:15:51 6	have been more of Jeff Welch and and Gregg Sutton,
09:13:28 7	excuse me, as	09:15:55 7	and Howard.
09:13:29 8	A. Okay.	09:15:59 8	Q. And by "Howard" you mean "Howard Root;"
09:13:30 9	Q if I	09:15:59 9	A. Howard Root, yes,
09:13:31 10	A. Sure.	09:16:02 10	Q. is that correct?
09:13:31 11	Q. if I'm misunderstanding what a pull test	09:16:03 11	A correct.
09:13:33 12	is. So is it just is it really just pulling on the	09:16:04 12	Q. Thanks.
09:13:36 13	two components	09:16:06 13	I'm sorry. Could you clarify once more,
09:13:37 14	A. Yes, pretty much.	09:16:09 14	what was your involvement in the benchtop testing?
09:13:39 15	Q. to make sure that they're not coming	09:16:12 15	A. I would have done that too, but more as a
09:13:40 16	apart? Okay.	09:16:16 16	like I said I guess just more for my own use, my own
09:13:41 17	A. Yes, pretty much.	09:16:22 17	feeling about the parts, to see how it worked, since,
09:13:42 18	And then we would have a basic maybe a	09:16:27 18	you know,
09:13:46 19	basic test instrument that would give us a a	09:16:27 19	Q. Okay.
09:13:48 20	number, a pound pull	09:16:27 20	A just to be involved.
09:13:54 21	(Interruption by the reporter.)	09:16:32 21	Q. But the primary testers were Welch, Sutton
09:13:55 22	A. I guess, yeah, like, I guess a, you know, I	09:16:36 22	and Root; is that correct?
09:13:58 23	would call it, yeah, a a pound you know, a	09:16:37 23	A. Correct.
09:14:03 24	number the whatever the whatever the number	09:16:42 24	Q. And again we're still talking about those
09:14:05 25	would be to, you know. So, like, a comparative	09:16:44 25	early prototypes for which you had machined hypotube
	STIREWALT & ASSOCIATES		STIREWALT & ASSOCIATES
	1-800-553-1953 info@stirewalt.com		1-800-553-1953 info@stirewalt.com
	18		20
09:14:10 1	18 number.	09:16:48 1	20 parts; is that correct?
09:14:10 1 09:14:12 2		09:16:48 1 09:16:50 2	
	number.		parts; is that correct?
09:14:12 2	number. Q. Comparative number. What would it be	09:16:50 2	parts; is that correct? A. Correct.
09:14:12 2 09:14:15 3	number. Q. Comparative number. What would it be compared to?	09:16:50 2 09:16:56 3	parts; is that correct? A. Correct. Q. Okay. Moving to paragraph 13, there's
09:14:12 2 09:14:15 3 09:14:16 4	number. Q. Comparative number. What would it be compared to? A. To the To	09:16:50 2 09:16:56 3 09:17:00 4	 parts; is that correct? A. Correct. Q. Okay. Moving to paragraph 13, there's now in paragraph 13 you're no longer talking about
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