

ROUGH DRAFT OF RAJENDRA SHAH

1 UNCERTIFIED REALTIME ROUGH DRAFT OF
2 RAJENDRA SHAH TAKEN 8/11/2021

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7 FORM, UPON ITS COMPLETION.

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10 Acceptance of this realtime draft is an
11 automatic final copy order.

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14 THE VIDEOGRAPHER: Good morning. We are
11:20:34 15 on the record at 11:20 a.m. Eastern Daylight Time
16 on August 11th, 2021.

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18 Please note that the microphones are
19 sensitive and may pick up whispering, private
20 conversations or cellular interference. Audio and

11:20:51 20 video recording will continue to take place unless
21 all parties agree to go off the record.

22 This is the media unit 1 of the
23 video-recorded deposition of Rajendra Shah taken by
24 counsel for the patent owner in the matter of
11:21:08 25 Google LLC versus EcoFactor, Inc. filed before the

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11:21:12 1 Patent Trial and Appeal Board,
2 Case No. IPR2021-00054, Patent No. 10,534,382.

3 This deposition is being held as a
4 virtual deposition via Zoom with the witness
11:21:35 5 located in Indianapolis, Indiana.

6 My name is Scott Slater from the firm
7 Veritext Legal Solutions, and I am the
8 videographer. Our court reporter is Rebecca Romano
9 from the firm Veritext Legal Solutions.

11:21:49 10 I am not related to any party in this
11 action, nor I am financially interested in the
12 outcome.

13 Counsel and all present will now state
14 their appearances and affiliations for the record.

11:21:58 15 If there any objections to proceeding, please state
16 them at the time of your appearance, beginning with

17 the noticing attorney.

18 MR. MIRZAIE: This is Reza Mirzaie of
19 Russ August & Kabat and I represent the patent

11:22:12 20 owner, EcoFactor.

21 MR. SMITH: And this is Matthew Smith of
22 Smith Baluch LLP and I represent the petitioner,
23 Google.

24 THE VIDEOGRAPHER: Thank you very much.

11:22:22 25 Will the court reporter please administer

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11:22:24 1 the oath.

2 THE COURT REPORTER: At this time, I will
3 ask counsel to agree on the record that there is no
4 objection to this deposition officer administering
11:22:24 5 a binding oath to the deponent via remote
6 videoconference, starting with the noticing
7 attorney, please.

8 MR. MIRZAIE: Yes, no objection.

9 MR. SMITH: No objection.

11:22:43 10 THE COURT REPORTER: If you could raise
11 your right hand for me, please.

12 THE DEPONENT: (Complies.)

13 THE COURT REPORTER: You do solemnly
14 state, under penalty of perjury, that the testimony
11:22:43 15 you are about to give in this deposition shall be
16 the truth, the whole truth and nothing but the
17 truth?

18 THE DEPONENT: I do.

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11:22:43 20

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11:06:14 5 having been administered an oath, was examined and
6 testified as follows:

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EXAMINATION

9 BY MR. MIRZAIE:

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