

\*\*ROUGH DRAFT OF RAJENDRA SHAH\*\*

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2                   RAJENDRA SHAH TAKEN 8/11/2021

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1 COMPUTERIZED) TO ANY PARTY. HOWEVER, MY OWN  
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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.

17

18 Please note that the microphones are  
19 sensitive and may pick up whispering, private  
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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