

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

MYPAQ HOLDINGS LTD.,

Plaintiff,

v.

DELL TECHNOLOGIES INC. and  
DELL INC.,

Defendants.

CIVIL ACTION NO. 6:21-CV-00933-ADA

JURY TRIAL DEMANDED

**PLAINTIFF'S NOTICE OF DEPOSITION OF ANDY SULTENFUSS**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiff MyPAQ Holdings Ltd. ("MyPAQ" or "Plaintiff") will take the deposition of Andy Sultenfuss by oral examination.

The deposition will take place beginning on Friday, March 18, 2022, at 1:00 p.m. CT. The deposition will be conducted virtually through a private video conference, the credentials of which will be provided in advance, and will continue from day to day until completed. The deposition shall be taken before an officer authorized to take oaths and shall be recorded by a stenographer and by videotape. Plaintiff reserves the right to use LiveNote or other technology for real-time transcription of the testimony. The deposition will be taken for the purpose of discovery, to perpetuate testimony for use at trial, and for all other purposes permitted under the Federal Rules of Civil Procedure.

The procedures for attending the remote deposition are below and all participants should contact Lexitas directly for any technical questions or assistance.

1. Participants need a computer equipped with a webcam and a high-speed, reliable internet connection.
2. In advance of the deposition, counsel for Plaintiff or Lexitas will provide a link for the remote deposition.

MyPAQ, Exhibit 2011

3. Immediately before the deposition, participants should click the link to automatically connect to a secure meeting via the internet.
4. Participants should be prepared to connect to audio via telephone with clear reception in the event transmission of audio by internet is unclear.
5. Participants should mute their microphone unless actively participating to reduce interference, echo, and ambient noise.
6. Deposition exhibits will be presented and exchanged electronically.

Dated: February 16, 2022

Respectfully submitted,

By: /s/ Krisina J. Zuñiga

Charles Ainsworth (Texas 00783521)  
Robert Christopher Bunt (Texas 00787165)  
PARKER, BUNT & AINSWORTH, P.C.  
100 E. Ferguson, Suite 418  
Tyler, Texas 75702  
Tel: (903) 531-3535  
charley@pbatyler.com  
rcbunt@pbatyler.com

Alfonso G. Chan (Texas 24012408)  
Michael W. Shore (Texas 18294915)  
Halima Shukri Ndai (Texas 24105486)  
SHORE CHAN LLP  
901 Main Street, Suite 3300  
Dallas, Texas 75202  
Tel: (214) 593-9110  
Fax: (214) 593-9111  
achan@shorechan.com  
mshore@shorechan.com  
hndai@shorechan.com

Brian D. Melton (Texas 24010620)  
Krisina J. Zuñiga (Texas 24098664)  
Scott T. Glass (Texas 24121287)  
SUSMAN GODFREY LLP  
1000 Louisiana Street, Suite 5100  
Houston, Texas 77002  
Tel: (713) 651-9366  
Fax: (713) 654-6666  
bmelton@susmangodfrey.com  
kzuniga@susmangodfrey.com  
sglass@susmangodfrey.com

Steven M. Shepard (New York 5291232)  
SUSMAN GODFREY LLP  
1301 Avenue of the Americas, 32nd Floor  
New York, New York 10019  
Tel: (212) 336-8330  
Fax: (212) 336-8340  
sshepard@susmangodfrey.com

**COUNSEL FOR PLAINTIFF  
MYPAQ HOLDINGS LTD.**

MyPAQ, Exhibit 2011

## CERTIFICATE OF SERVICE

I hereby certify that I served counsel of record on Wednesday, February 16, 2022, with a copy of this document via electronic mail.

/s/ Krisina J. Zuñiga  
Krisina J. Zuñiga  
**SUSMAN GODFREY LLP**

MyPAQ, Exhibit 2011