

**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 DEPOSITIONS OF DEFENDANTS' VENUE WITNESSES**

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 depositions of the following witnesses by oral examination on the following dates and at the following times.

<b>Witness</b>	<b>Deposition Date/Time</b>
Jacqueline Gutierrez	March 28, 2022 at 9:00 am CT
Marcin Nowak	March 28, 2022 at 10:30 am CT
John Bretsch	March 28, 2022 at 1:00 pm CT
Penne Allen	March 28, 2022 at 2:30 pm CT
Christina Anderson	March 28, 2022 at 4:00 pm CT

The depositions 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 depositions 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.

MyPAQ, Exhibit 2012

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.
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: March 11, 2022

Respectfully submitted,

By: /s/ Krisina J. Zuñiga

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**COUNSEL FOR PLAINTIFF  
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MyPAQ, Exhibit 2012

## CERTIFICATE OF SERVICE

I hereby certify that I served counsel of record on Friday, March 11, 2022, with a copy of this document via electronic mail.

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

MyPAQ, Exhibit 2012