

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

MYPAQ HOLDINGS LTD.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC., SAMSUNG SEMICONDUCTOR,
INC., and SAMSUNG AUSTIN
SEMICONDUCTOR, LLC,

Defendants.

CIVIL ACTION NO. 6:21-CV-398-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.

Witness	Deposition Date/Time
Rafael Lainez	March 21, 2022 at 9:00 am CT
Philip Turpin	March 21, 2022 at 1:00 pm CT
Solomon Chen	March 22, 2022 at 11:00 am CT
Hyunkyoo Ahn	March 22, 2022 at 6:00 pm 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.

MyPAQ, Exhibit 2013

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: February 21, 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 2013

CERTIFICATE OF SERVICE

I hereby certify that I served counsel of record on Monday, February 21, 2022, with a copy of this document via electronic mail.

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

MyPAQ, Exhibit 2013