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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

MOLO DESIGN LTD.,)
)
Plaintiff,)
)
vs.) No. 1:21-CV-01578 (VEC)
)
CHANEL, INC.,)
)
Defendant.)

VIDEOTAPED DEPOSITION OF
LANCE RAKE, Ph.D.
Remote via Zoom
December 20, 2022

Stenographically Reported by:
ANDREW R. PITTS, CSR, RPR
Job No. 220729

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December 20, 2022

9:03 a.m. Central Daylight Time

The videotaped deposition of LANCE
RAKE, Ph.D., remote via Zoom, pursuant to Notice
before the Rules of Civil Procedure for the
United States District Court for the Southern
District of New York, pertaining to Notice
before Andrew R. Pitts, Certified Shorthand
Reporter, Registered Professional Reporter.

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A P P E A R A N C E S (Via Videoconference):

ON BEHALF OF PLAINTIFF:

BRACEWELL LLP
MICHAEL CHIBIB, ESQ.
111 Congress Avenue
Austin, Texas 78701

ON BEHALF OF DEFENDANT:

DORSEY & WHITNEY LLP
SHANNON BJORKLUND, ESQ.
50 South Sixth Street
Minneapolis, Minnesota 55402

ALSO PRESENT:

JONATHAN POPHAM, Legal Videographer

WILFRED SO (Zoom)

ALAN BALL (Zoom)

CONOR CIVINS (Zoom)

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I N D E X

LANCE RAKE, Ph.D.

EXAMINATION

BY MR. CHIBIB
BY MS. BJORKLUND

6
182

E X H I B I T S

NUMBER	DESCRIPTION	PRESENTED
Exhibit 1001	Petition Exhibit IPR 1	21
Exhibit 1002	'366 Patent prosecution history	21
Exhibit 1003	Mr. Rake's declaration in IPR 543	22
Exhibit 1005	Soft housing 1 opinion reference	34
Exhibit 1006	Soft housing 2 opinion reference	34
Exhibit 1007	Soft housing 3 opinion reference	34
Exhibit 1012	Velcro reference	69
Exhibit 1013	Arens reference	70
Exhibit 1008	Kaisin 1	75
Exhibit 1009	Kaisin 2	74
Exhibit 1010	Kaisin 3	74
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E X H I B I T S C O N T I N U E D

NUMBER	DESCRIPTION	PRESENTED
Exhibit 1028	Soft wall reference	137
Exhibit 1037	MacAllen 2008 reference	150
Exhibit 1038	Stratton reference	150
Exhibit 1039	Fischer reference	150
Exhibit 1040	Tolna reference	150
Exhibit 1041	Reisenthel reference	150
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Exhibit 1033	MacAllen reference re U.S. patent publication U.S. 2006/0260231	175

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