

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD

3 _____
4 CHANEL, INC.,

5 Petitioner,

6 v.

Case No.

7 MOLO DESIGN, LTD.,

IPR2022-00543

8 Patent Owner.
9 _____

10 VIDEOCONFERENCE DEPOSITION OF

11 STEPHANIE FORSYTHE

12 DATE: Friday, March 24, 2023

13 TIME: 11:58 a.m.

14 LOCATION: Remote Proceeding

15 Minneapolis, MN 55402

16 OFFICIATED BY: Tina Nelson, Notary Public

17 JOB NO.: 5793554
18
19
20
21
22
23
24
25

A P P E A R A N C E S

ON BEHALF OF PETITIONER CHANEL, INC.:

GEOFFREY M. GODFREY, ESQUIRE (by videoconference)

Dorsey & Whitney LLP

701 Fifth Avenue, Suite 6100, Columbia Center

Seattle, WA 98104

godfrey.geoff@dorsey.com

ON BEHALF OF PATENT HOLDER MOLO DESIGN, LTD. AND

STEPHANIE FORSYTHE:

MICHAEL CHIBIB, ESQUIRE (by videoconference)

Bracewell LLP

111 Congress Avenue, Suite 2300

Austin, TX 78701

michael.chibib@bracewell.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

| | |
|----------------|------|
| EXAMINATION: | PAGE |
| By Mr. Godfrey | 5 |

E X H I B I T S

| NO. | DESCRIPTION | PAGE |
|--------------|------------------------------------------------------|------|
| Exhibit 2006 | Affidavit of Stephanie Forsythe | 10 |
| Exhibit 1021 | List of General Rules, 2003 DBEW Competition | 17 |
| Exhibit 1005 | PDF Copy of Archived Webpage, DBEW, Softhousing 1 | 30 |
| Exhibit 1014 | MOLO_00004200 - MOLO_00004204 | 33 |
| Exhibit 1020 | MOLO_00004196 - MOLO_00004199 | 34 |
| Exhibit 2021 | E-mail, Evelyn Lacson | 39 |
| Exhibit 2030 | Molo Webpage, 12/14/2022 | 40 |

(Exhibits attached.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

P R O C E E D I N G S

THE OFFICER: Good afternoon. My name is Tina Nelson; I am the officer assigned by Veritext to take the record of this proceeding. We are now on the record at 11:58 a.m., so I should say, good morning.

This is the deposition of Stephanie Forsythe taken in the matter of Chanel, Inc. vs. Molo Design, Limited, on Friday, March 24, 2023, remote via Zoom.

I am a notary authorized to take acknowledgments and administer oaths in Minnesota. Parties agree that I will swear in the witness remotely.

Additionally, absent an objection on the record before the witness is sworn, all parties and the witness understand and agree that any certified transcript produced from the recording of this proceeding:

- is intended for all uses permitted under applicable procedural and evidentiary rules and laws in the same manner as a deposition recorded by stenographic means; and

- shall constitute written stipulation of such.

At this time will everyone in attendance

1 please identify yourself for the record.

2 MR. GODFREY: Geoff Godfrey with Dorsey &
3 Whitney, representing Chanel.

4 MR. CHIBIB: Michael Chibib; Bracewell,
5 representing Molo Design, Limited, and the witness.

6 MS. FORSYTHE: Stephanie Forsythe, of
7 Molo Design, Limited; witness.

8 THE REPORTER: Thank you. Hearing No.
9 objection, I will now swear in the witness.

10 Ms. Forsythe, please raise your right
11 hand.

12 WHEREUPON,

13 STEPHANIE FORSYTHE,
14 called as a witness, and having been first duly sworn to
15 tell the truth, the whole truth, and nothing but the
16 truth, was examined and testified as follows:

17 THE REPORTER: Go ahead, Counsel.

18 EXAMINATION

19 BY MR. GODFREY:

20 Q Good morning, Ms. Forsythe.

21 A Good morning.

22 Q Would you please state your full name and
23 address for the record?

24 A My full name is Stephanie Jo Forsythe, and
25 my -- sorry; address is what you asked for?

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.