

CHANEL, INC., Petitioner,

v. MOLO DESIGN, LTD., Patent Owner.

Case IPR2022-00545 Patent 9,689,161 B2

NOTICE TO TAKE DEPOSITION OF LANCE RAKE



PLEASE TAKE NOTICE that, pursuant to 37 C.F.R. § 42.53, Molo Design, Ltd., by and through its undersigned counsel, will take the oral deposition of Lance Rake, c/o Dorsey & Whitney LLP, 1400 Wewatta Street, Suite 400 Denver, CO 80202, on **December 20, 2022 beginning at 9:00 AM CST** by remote deposition via Zoom..

The deposition may be recorded for all lawful purposes by audio, audiovisual, or stenographic means using stenograph and videotape before a notary public or other officer authorized by law to administer oaths... The scope of the deposition will be Mr. Rake's direct testimony set forth in his declaration (Ex. 1003) and the bases for his opinions therein. At least the following exhibits will be referenced during the deposition:

- 1. IPR Petition
- 2. Patent Owner's Preliminary Response
- **3.** Exs. 1001-1032
- 4. Exs. 2001-2008

Pursuant to 37 CFR § 42.53(d)(1), the parties have conferred and have agreed on this date and location for the deposition.



Dated: December 15, 2022

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing NOTICE OF DEPOSITION was served on counsel of record for Petitioner on December 15, 2022, by delivering a copy via electronic mail to the following counsel of record:

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