Page 1
IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
DAVENPORT DIVISION
* * * * * * * * * * * * * * * * * * * *
NUHN INDUSTRIES LTD., Case No. 3:22-CV-00015-SMR-HCR
Plaintiff,
v.
BAZOOKA FARMSTAR, LLC,
Defendant.

VIDEO-RECORDED REMOTE ZOOM DEPOSITION OF
MAURICE BRYHAM, AS THE REPRESENTATIVE
OF SEALEGS INTERNATIONAL
Taken Tuesday, October 29, 2024
Scheduled for 2:00 P.M. CENTRAL TIME
REPORTED BY: Lori Morrow, RDR, RMR, CRR, CRC
JOB NO.: MW 6972640

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Page 2 VIDEO-RECORDED REMOTE ZOOM DEPOSITION OF 1 2 MAURICE BRYHAM AS THE REPRESENTATIVE OF SEALEGS taken Tuesday, October 29, 2024, commencing at 2:30 p.m. (CDT) 3 4 before Lori Morrow, Certified Diplomate Reporter, 5 Certified Realtime Reporter, Certified Realtime Captioner, and a Stenographic Shorthand Reporter and б 7 Notary Public of and for the State of Minnesota. * * * * * * * * * * 8 9 APPEARANCES: On Behalf of the Plaintiff: 10 11 Scott E. Yackey, Esquire 12 HARNESS IP 13 2600 Network Boulevard, Suite 230 14 Frisco, Texas 75034 15 (469) 777-5423 16 syackey@harnessip.com 17 On Behalf of the Defendant: 18 19 Thomas J. Leach, Esquire 20 MERCHANT & GOULD P.C. 21 150 South Fifth Street, Suite 2200 Minneapolis, Minnesota 55402 22 23 (612) 336-4665 24 TLeach@MerchantGould.com 25 (APPEARANCES continued on the next page.)

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	Page 3
1	APPEARANCES (CONTINUED):
2	
3	ALSO PRESENT: Brian Ciccone, Videographer
4	
	* * * * * * *
5	
6	NOTE: The original transcript will be delivered to
7	Thomas Leach, Esquire.
8	
9	I N D E X
10	WITNESS:
11	MAURICE BRYHAM, IN HIS CAPACITY AS THE DESIGNATED
12	CORPORATE REPRESENTATIVE OF SEALEGS
13	
14	EXAMINATION BY: PAGE:
15	Mr. Leach 7
16	Mr. Yackey 99
17	Mr. Leach 121
18	Mr. Yackey 124
19	Mr. Leach 126
20	
21	INSTRUCTIONS: (None)
22	REQUESTS FOR PRODUCTION: (None)
23	
24	
25	

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			Page 4
1		EXHIBITS	
2	EXHIBITS:	DESCRIPTION:	PAGE:
3	Exhibit 41	U.S. Patent No. 7,314,395,	
4		Amphibious Vehicle (Bates	
5		BAZ15_0001354 - 1380)	. 12
б	Exhibit 42	SydneyBoating.com Brochure of	
7		Sealegs products	
8		(Bates BAZ15_0193257)	. 18
9	Exhibit 43	Brochure for Amphibious Rescue	
10		Craft (Bates SEA0000003 - 10)	. 24
11	Exhibit 44	Screenshots of Sealegs Native	
12		Files' Properties (No Bates)	. 25
13	Exhibit 45	Sealegs Tax Invoice 13459 to Ideal	
14		House Construction Co., Ltd.,	
15		dated 6/1/2013 (Bates	
16		SEA0000001 - 2)	. 45
17	Exhibit 46	Sealegs brochure of products,	
18		story and background, and	
19		customer applications (Bates	
20		SEA0000011 - 66)	. 54
21	Exhibit 47	Photos of Sealegs fire	
22		pump craft (in factory)	
23		(Bates SEA0000067)	. 71
24	(EXHIBITS C	ontinued on the next page.)	
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1EXHIBITS (CONTINUED):PAGE:2Exhibit 48 Photo of Sealegs fire pump craft3(inside shipping container)4(Bates SEA0000068)			Page 5		
3(inside shipping container)4(Bates SEA000068)	1	EXHIBITS (CON	TINUED): PAGE:		
4 (Bates SEA0000068)	2	Exhibit 48 P	hoto of Sealegs fire pump craft		
 5 Exhibit 49 Web page from Sealegs 6 International's Facebook page 7 (Bates BAZ15-0193258 - 193259) 76 8 Exhibit 50 Excerpts from Sealegs' Facebook 9 page (Bates BAZ15-019350 - 19353) 81 10 Exhibit 51 Screenshot of web page from 11 Sealegs' web site (Bates 12 BAZ15-0193254) 84 13 Exhibit 52 Video of Sealegs Fire Rescue 14 Vehicles (Bates BAZ15-0193260) 87 15 (REPORTER'S NOTE: Quotations from exhibits are 17 reflected in the manner in which they were read into the 18 record and do not necessarily indicate an exact quote 19 from the document.) 20 ******** 21 22 23 24 	3	(inside shipping container)		
 International's Facebook page (Bates BAZ15-0193258 - 193259) 76 Exhibit 50 Excerpts from Sealegs' Facebook page (Bates BAZ15-019350 - 19353) 81 Exhibit 51 Screenshot of web page from Sealegs' web site (Bates BAZ15-0193254)	4	(Bates SEA0000068) 71		
7 (Bates BAZ15-0193258 - 193259) 76 8 Exhibit 50 Excerpts from Sealegs' Facebook 9 page (Bates BAZ15-019350 - 19353) 81 10 Exhibit 51 Screenshot of web page from 11 Sealegs' web site (Bates 12 BAZ15-0193254)	5	Exhibit 49 W	eb page from Sealegs		
 8 Exhibit 50 Excerpts from Sealegs' Facebook 9 page (Bates BAZ15-019350 - 19353) 81 10 Exhibit 51 Screenshot of web page from 11 Sealegs' web site (Bates 12 BAZ15-0193254)	6	I	nternational's Facebook page		
9 page (Bates BAZ15-019350 - 19353) 81 10 Exhibit 51 Screenshot of web page from 11 Sealegs' web site (Bates 12 BAZ15-0193254)	7	(Bates BAZ15-0193258 - 193259) 76		
<pre>10 Exhibit 51 Screenshot of web page from 11 Sealegs' web site (Bates 12 BAZ15-0193254)</pre>	8	Exhibit 50 E	xcerpts from Sealegs' Facebook		
Sealegs' web site (Bates BAZ15-0193254)	9	p	age (Bates BAZ15-019350 - 19353) 81		
12BAZ15-0193254)	10	Exhibit 51 S	creenshot of web page from		
Exhibit 52 Video of Sealegs Fire Rescue Vehicles (Bates BAZ15-0193260) 87 (REPORTER'S NOTE: Quotations from exhibits are reflected in the manner in which they were read into the record and do not necessarily indicate an exact quote from the document.) from the document.)	11	S	ealegs' web site (Bates		
14Vehicles (Bates BAZ15-0193260) 871516(REPORTER'S NOTE: Quotations from exhibits are17reflected in the manner in which they were read into the18record and do not necessarily indicate an exact quote19from the document.)20********21222324	12	В	AZ15-0193254)		
<pre>15 16 (REPORTER'S NOTE: Quotations from exhibits are 17 reflected in the manner in which they were read into the 18 record and do not necessarily indicate an exact quote 19 from the document.) 20 ******** 21 22 23 24</pre>	13	Exhibit 52 V	ideo of Sealegs Fire Rescue		
<pre>16 (REPORTER'S NOTE: Quotations from exhibits are 17 reflected in the manner in which they were read into the 18 record and do not necessarily indicate an exact quote 19 from the document.) 20 ******** 21 22 23 24</pre>	14	v	ehicles (Bates BAZ15-0193260) 87		
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18 record and do not necessarily indicate an exact quote 19 from the document.) 20 ******** 21 22 23 24	16	(REPORTER'S NOTE: Quotations from exhibits are			
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