| To the second | Page 1 |
|---------------|--|
| 1 | |
| 2 | ** HIGHLY CONFIDENTIAL ** |
| 3 | UNITED STATES DISTRICT COURT |
| | FOR THE EASTERN DISTRICT OF TENNESSEE |
| 4 | GREENEVILLE DIVISION |
| | Civil Action No. 2:14-CV-00196 |
| 5 | x |
| | DENTSPLY INTERNATIONAL, INC. and TULSA |
| 6 | DENTAL PRODUCTS LLC d/b/a TULSA DENTAL |
| | SPECIALTIES, |
| 7 | |
| | Plaintiffs, |
| 8 | |
| 9 | |
| | - against - |
| 10 | |
| 11 | |
| | US ENDODONTICS, LLC, |
| 12 | |
| | Defendant. |
| 13 | x |
| | September 19, 2014 |
| 14 | 9:24 a.m. |
| 15 | |
| 16 | Videotaped Deposition of BOBBY |
| 17 | BENNETT, taken by Plaintiffs, pursuant to |
| 18 | Notice, held at the offices of Kenyon & |
| 19 | Kenyon LLP, One Broadway, New York, New |
| 20 | York, before Todd DeSimone, a Registered |
| 21 | Professional Reporter and Notary Public of |
| 22 | the State of New York. |
| 23 | GOLD STANDARD EXH |

US ENDODONTICS v. GOLD STANDARD CASE PGR2015-00019

Case 2:14-cv-00196-JRG-DHI Document 156-1 Filed 12/12/14 Page 2 of 74 14.60% 24/00



25

```
5
                 MR. GINSBERG: Objection to the
 6
    form of the question.
 7
                 After D&S Dental where did you
        Q.
8
    go?
9
                 I actually started my own
        A.
    business.
10
                 And what business was that?
11
        Q.
        A.
                 It is US Endodontics.
12
13
        Q.
                 Did you start that business by
14
    yourself?
15
        A.
                 No.
16
                 Who did you start the business
        Q.
17
    with?
                 Dr. Chuck Goodis.
18
        A.
19
                 Did you start the business with
        Q.
20
    anyone else?
21
        A.
                 No.
22
        Q.
                 And when did you meet Dr. Chuck
    Goodis?
23
                 I still haven't met Dr. Chuck
24
        A.
25
    Goodis until this day, believe it or not.
```

| 5 | Q. | And who was that? |
|----|--------------|-------------------------------|
| 6 | A . | John Ferone. |
| 7 | Q. | Is that F-e-r-r-o-n-e? |
| 8 | A . | F-e-r-o-n-e. |
| 9 | Q. | One R? |
| 10 | A . | One R. |
| 11 | Q. | And what does John Ferone do? |
| 12 | A . | Today he is a sales manager |
| 13 | with Henry | Schein. |
| 14 | Q . | Has John Ferone had any |
| 15 | involvement | in US Endo? |
| 16 | A . | No. |
| 17 | Q. | So approximately when did you |
| 18 | start US End | do? |
| 19 | A . | It was in 2011. |
| 20 | Q. | What are your current job |
| 21 | responsibil | ities at US Endo? |
| 22 | A . | Managing the operation. |
| 23 | Q. | Do you have any other |
| 24 | responsibil | ities there? |
| 25 | A . | That's it, manage the |

```
5
                 To a degree.
         Α.
                 Are you involved in quality?
 6
        Q.
7
        A.
                 It's a small company. I'm
    involved in everything.
8
                 Approximately how many
9
        Q.
    employees does US Endo have?
10
11
        A.
                 21.
12
        Q.
                 Do you report to anyone?
13
        A.
                 No.
14
                 Is Dr. Goodis an employee of US
        Q.
15
    Endo?
16
        A.
                 No.
17
                 So are you and Dr. Goodis
        Q.
18
    co-owners of US Endo?
19
        A.
                 Correct.
                 And approximately how much do
20
        Q.
21
    you own of US Endo?
22
                           percent.
        A.
                 I own
23
                 MR. GINSBERG:
                                 We are getting
24
    into matters of confidential information.
25
    I would like to designate this entire
```

| _ | _ | |
|----|---------------|--------------------------------|
| 5 | Q. 2 | And does Dr. Goodis own the |
| 6 | remainder of | US Endo? |
| 7 | A . | |
| 8 | Q | So how many people report to |
| 9 | you at US End | io? |
| 10 | A. V | Well, I guess 21. It is an |
| 11 | informal stru | acture. We don't believe in |
| 12 | the rigidity. | |
| 13 | Q. Z | And do you hold any other |
| 14 | positions at | US Endo? |
| 15 | A. 1 | No. |
| 16 | Q | And have you previously held |
| 17 | any other pos | sitions there? |
| 18 | A. 1 | No. |
| 19 | Q | And so other than Quality |
| 20 | Dental, Tulsa | a Dental, Dentsply, D&S Dental |
| 21 | and US Endo, | you haven't worked anywhere |
| 22 | else since hi | igh school? |
| 23 | A. V | Well, we can go back to when I |
| 24 | was 16 and wo | orked at White's Grocery if |
| 25 | you would lik | ce. |

DOCKET

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.

