

**Deposition of Diane Lee on September 12, 2015**

<b>Parrot's Designations Page/Line</b>	<b>Drone Technologies, Inc.'s Counter-designations Page/Line</b>	<b>Drone Technologies, Inc.'s Objections</b>	<b>Parrot's Objections to designations and Objections</b>
9:8-19 (from "Can you . . .)			
10:19-11:1			
11:6-19			
12:10-21			
	12:22-13:8	(Drone Technologies response to Parrot Objection) – Testimony is relevant to the completion of previous testimony regarding the marital relationship between Ms. Lee and Mr. Ding. Also relevant to provide context for testimony designated by Parrot at 86:2-13, 86:22-87:6.	Parrot Objection to c FRE401-403. Not re damages.
13:23-14:2			
15:20-25			
16:22-17:6			
18:9-18			
	19:1-10		
21:3-11			
21:22-22:4 (from "When you started . . .)			
22:19-23:7 (From "Tell me ...)			
23:19-22			
24:23-25 (from "How did ...)			

26:10-23			
	29:6-9		
	39:9-11		
39:24-40:15		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of i
40:19-41:1		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of iv
41: 5-8		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of iv
63:22-25 (from "Do you . . .")		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of i
64: 4-17		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of iv
65:3-8		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of i
65:15-20		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of i
66:16-17		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of i
66:19-67:4		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of i
67:24-68:3		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of i
68:20-69:3		Ms. Lee's testimony is not relevant to any issue remaining in this case (FRE 402) and if it were relevant, it should be excluded because its probative value is substantially outweighed by the danger of unfair prejudice, confusion of the issues or the potential to mislead the jury (FRE 403).  Drone Technologies Motion in Limine 1 (Doc No.	Relevant to Georgia ("The utility and ad patented property ov devices, if any, that working out similar state of the art.

<sup>1</sup> Highlighted sections will not be introduced without prior approval of the Court.

		<p>236) was granted (Doc. No. 287 ¶ 1), precluding Parrot from presenting arguments as to the alleged deficiencies in Ms. Lee’s inventorship. That order (Doc. No. 287 ¶ 1) was the fourth time this Court has dealt with this issue, including this specific testimony by Ms. Lee (see Doc. No. 229, page 3).</p> <p>Parrot asserts that Ms. Lee’s testimony is relevant to damages under Georgia Pacific Factor 11, however, there is nothing probative in this designated portion of Ms. Lee’s testimony relative to Parrot’s use of the invention, or evidence of the value of that use.</p>	
69:15-19		<p>Ms. Lee’s testimony is not relevant to any issue remaining in this case (FRE 402) and if it were relevant, it should be excluded because its probative value is substantially outweighed by the danger of unfair prejudice, confusion of the issues or the potential to mislead the jury (FRE 403).</p> <p>Drone Technologies Motion in Limine 1 (Doc No. 236) was granted (Doc. No. 287 ¶ 1), precluding Parrot from presenting arguments as to the alleged deficiencies in Ms. Lee’s inventorship. That order (Doc. No. 287 ¶ 1) was the fourth time this Court has dealt with this issue, including this specific testimony by Ms. Lee (see Doc. No. 229, page 3).</p> <p>Parrot asserts that Ms. Lee’s testimony is relevant to damages under Georgia Pacific Factor 10, however, there is nothing probative in this testimony relative to the nature of the invention;</p>	<p>Relevant to Georgia (“The nature of the p the character of the embodiment of it as by the licensor...”).</p>

		evidence of the benefits to those who have used the invention; and there is no “commercial embodiment” owned or produced by the licensor. Accordingly, this testimony is wholly irrelevant to GPF 10.	
69:23-24		Same objection as above for 69:15-19	Relevant to Georgia (“The nature of the p the character of the embodiment of it as by the licensor...”).
70:7-8 (From “You’re not ...)		Same objection as above for 69:15-19	Relevant to Georgia
70:12-16		Same objection as above for 69:15-19	Relevant to Georgia (See above)
71:2-14		Same objection as above for 69:15-19	Relevant to Georgia (See above)
71: 16-20		Same objection as above for 69:15-19	Relevant to Georgia (See above)
71:22-23		Same objection as above for 69:15-19	Relevant to Georgia (See above)
72:18-19		Same objection as above for 69:15-19	Relevant to Georgia P above)
72:21-73:8		Same objection as above for 69:15-19	Relevant to Georgia P above)
73:14-15		Same objection as above for 69:15-19	Relevant to Georgia P above)
73:17-75:1		Same objection as above for 69:15-19	Relevant to Georgia P above)
75:7-9 (From “Would it be ...)		Same objection as above for 69:15-19	Relevant to Georgia P above)
75:11-12 and 15-17		Same objection as above for 69:15-19	Relevant to Georgia P above)
75:19-25		Same objection as above for 69:15-19	Relevant to Georgia P

			above)
76:8-10		Same objection as above for 69:15-19	Relevant to Georgia P above)
76:12-13		Same objection as above for 69:15-19	Relevant to Georgia P above)
78:5-17		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of in
79:1-4		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of in
85:18-20 and 85:24-86:1		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236)	Parrot only seeks to a door on the issue of in
86:2-13		FRE 402, 403; Drone Technologies Motion in Limine 1 (Doc No. 236) as to 85:24-86:1	Relevant to Georgia ("The royalties receiv the licensing of the p or tending to prove a royalty.")
86:22-87:6			
87:22-88:2			
88:19-89:2			
	89:3-5, 89:9		
90:2-4			
90:16-24			
	91:3-10		
91:18-92:2 (from "So it was ...")			
92:11-12			
92:14			
104:10-19			
	105:20-106:14, 16,	(Drone Technologies response to Parrot Objection)	Parrot Objection to c

# 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.