Filed on behalf of EmeraChem Holdings, LLC

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC. Petitioner

v.

EMERACHEM HOLDINGS, LLC Patent Owner

Case No. IPR2014-01554 (Patent 6,037,307) Case No. IPR2014-01555 (Patent 5,451,558) Case No. IPR2014-01556 (Patent 5,953,911) Case No. IPR2014-01557 (Patent 7,951,346 B2) Case No. IPR2014-01558 (Patent 5,599,758)

EMERACHEM HOLDINGS, LLC'S NOTICE OF CROSS-EXAMINATION DEPOSITION OF EXPERT ROBERT J. FARRAUTO, PH.D. IPR2014-01554 through IPR2014-01558 EmeraChem's Notice of Cross-Examination Deposition of Robert J. Farrauto, Ph.D.

The parties have agreed that the Patent Owner EmeraChem Holdings, LLC will conduct its cross-examination by deposition of the Petitioner's expert as follows:

Place:	Locke Lord, LLP 3 World Financial Center, 20 th Floor New York, NY 10281
Time:	June 3-4, 2015 (June 5, 2015 reserved if needed)
Declarant Name: Robert J. Farrauto, Ph.D.	

In accordance with 37 C.F.R. § 42.53(d)(1), the parties have confirmed and Petitioner Volkswagen Group of America, Inc. ("Petitioner") has represented that Dr. Farrauto is willing to appear at the time and location indicated above. The cross-examination will be taken before a Notary Public or other officer authorized by law to administer oaths. It will be recorded at least using stenographic means.

Date: May 18, 2015

Respectfully submitted,

900 S. Gay St., Suite 1504 P. O. Box 1871 Knoxville, TN 37901-1871 (865) 546-4305 By: /Michael J. Bradford/ Michael J. Bradford-Reg. No. 52,646 LUEDEKA NEELY GROUP, P.C.

> Attorney for Patent Owner – EmeraChem Holdings, LLC

IPR2014-01554 through IPR2014-01558 EmeraChem's Notice of Cross-Examination Deposition of Robert J. Farrauto, Ph.D.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing EmeraChem's Notice of Cross-Examination Deposition of Petitioner's Expert Robert J. Farrauto, Ph.D. was served on May 18, 2015, by email at <u>ptopatentcommunication@ lockelord.com</u> and by causing it to be sent by U.S. Mail to counsel for Petitioner at the following address:

Steven F. Meyer Seth J. Atlas Locke Lord LLP 3 World Financial Center - 20th Floor New York, NY 10281

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Attorney for Patent Owner

May 18, 2015