

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**ZHUHAI COSMX BATTERY CO., LTD.,
Petitioner**

v.

**NINGDE AMPEREX TECHNOLOGY LTD.,
Patent Owner**

**IPR2025-00405
Patent 11,769,910**

**PATENT OWNER'S NOTICE OF DEPOSITION OF
BRETT LUCHT, PH.D.**

PATENT OWNER'S NOTICE OF DEPOSITION
IPR2025-00405 (Patent No. 11,769,910)

Please take notice that pursuant to 37 C.F.R. § 42.53, Patent Owner Ningde Ampere Technology Ltd. ("Patent Owner"), through its attorneys, will conduct cross-examination by deposition of Petitioner's Declarant, Brett Lucht, Ph.D., in IPR2025-00405 (U.S. Patent No. 11,769,910). Pursuant to 37 C.F.R. § 42.53(d), and as agreed by counsel, Dr. Lucht's deposition will take place beginning at 10:00 a.m. Eastern for up to 7 hours of cross-examination on October 21, 2025. The deposition will be conducted remotely by videoconference using meeting links to be provided in advance of the deposition and will be recorded by audio, stenographic, and/or visual means, before a certified court reporter and/or duly qualified officer to administer oaths. It may also be transcribed by real-time reporting software. In accordance with 37 C.F.R. § 42.53(d)(1), the parties have conferred and agreed upon the time and place (that is, here, remotely by video) of the deposition.

In accordance with the Scheduling Order (Paper No. 13), the deposition will take place more than one week prior to the due date for Patent Owner's Response to the Petition, thereby complying with 37 C.F.R. § 42.53(d)(2).

PATENT OWNER'S NOTICE OF DEPOSITION
IPR2025-00405 (Patent No. 11,769,910)

Respectfully submitted this 7th day of October, 2025.

/Christopher TL Douglas/
Christopher TL Douglas
Reg. No. 56,950
ALSTON & BIRD LLP
1120 South Tryon Street, Suite 300
Charlotte, NC 28208
Tel: (704) 444-1000
Fax: (704) 444-1111
E-mail: christopher.douglas@alston.com

Lead Counsel for Patent Owner Ningde
Amperex Technology Ltd.

PATENT OWNER'S NOTICE OF DEPOSITION
IPR2025-00405 (Patent No. 11,769,910)

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e), the undersigned hereby certifies that a true and correct copy of the above-captioned **PATENT OWNER'S NOTICE OF DEPOSITON OF BRETT LUCHT, PH.D**, was served in its entirety on October 7, 2025 via filing through the Patent Trial and Appeal Case Tracking System (P-TACTS) and electronic mail on the following counsel of record for Petitioner:

James D. Stein
james.stein@leehayes.com

Kevin Yao
kevin.yao@leehayes.com

Jason D. Eisenberg
jasone-PTAB@sternekessler.com

Jason Fitzsimmons
jfitzsimmons-PTAB@sternekessler.com

Service email
COSMX-PTAB@leehayes.com

Service email
PTAB@sternekessler.com

Date: October 7, 2025

/Christopher TL Douglas/
Christopher TL Douglas