

# EXHIBIT A

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
  
THE CHAMBERLAIN GROUP, INC., )  
Plaintiff, )  
vs. ) 1:16-cv-06097  
TECHTRONIC INDUSTRIES CO. )  
LTD., TECHTRONIC INDUSTRIES )  
NORTH AMERICA, INC., ONE WORLD )  
TECHNOLOGIES, INC., OWT )  
INDUSTRIES, INC., ET )  
TECHNOLOGY (WUXI) CO. LTD., )  
and RYOBI TECHNOLOGIES, INC., )  
Defendants. )

The highly confidential videotaped deposition of BRIAN BUTLER, called for examination, taken pursuant to the Federal Rules of Civil Procedure for the United States District Courts, taken before KAREN L. PILEGGI, CSR No. 84-3404, a Notary Public, within and for the County of DuPage, State of Illinois, Certified Shorthand Reporter within and for the State of Illinois, Registered Merit Reporter, at 120 South LaSalle Street, Suite 1600, Chicago, Illinois, on the 5th day of December, 2016, at the approximate hour of 9:37 a.m.

1 Q. Just so -- this may be shown to jurors  
2 some day. Could you show the camera what a head  
3 unit is.

4 A. (Indicating.)

5 Q. Just point to the head unit.

6 A. (Indicating.)

7 Q. In 2005 at the time you were working on  
8 the prototype, it was known that backup batteries in  
9 garage door operators were removable?

10 A. No.

11 Q. No?

12 A. They were not designed to be removable.

13 Q. Is it your testimony that Chamberlain  
14 prior to 2005 did not have a removable battery,  
15 backup battery for a garage door operator?

16 MR. GREEN: Objection. Asked and answered.

17 You may answer the question.

18 MR. ABERNATHY: It's a different question.

19 BY THE WITNESS:

20 A. They had a replaceable battery. But a  
21 removable battery, no.

22 BY MR. ABERNATHY:

23 Q. What's the difference, in your mind,  
24 between a replaceable and removable battery?

1           A.       Replaceable battery needs to be done by a  
2 qualified service person. Removable battery can be  
3 done by the consumer.

4           Q.       I appreciate that distinction. I just  
5 want to follow up. I don't want to split hairs too  
6 much but just so I understand your testimony.

7           A.       Sure.

8           Q.       Assume that the replaceable battery is,  
9 in fact, replaced by a qualified service person, the  
10 replaceable battery was removable?

11           MR. GREEN: Objection. Asked and answered.

12 BY THE WITNESS:

13           A.       It was removable using tools.

14 BY MR. ABERNATHY:

15           Q.       But it was removable?

16           MR. GREEN: Same objection.

17 BY THE WITNESS:

18           A.       All batteries are removable.

19 BY MR. ABERNATHY:

20           Q.       Was that removable battery rechargeable?

21           A.       I'll call it the replaceable battery and  
22 the replaceable battery was rechargeable.

23           Q.       And the replaceable battery that was  
24 rechargeable, that battery existed before you began

1 STATE OF ILLINOIS.)

2 ) SS:

3 COUNTY OF DUPAGE )

4 I, KAREN PILEGGI, a Notary Public  
5 within and for the County of DuPage, State of  
6 Illinois, and a Certified Shorthand Reporter of said  
7 state, do hereby certify:

8 That previous to the commencement of  
9 the examination of the witness, the witness was duly  
10 sworn to testify the whole truth concerning the  
11 matters herein;

12 That the foregoing deposition  
13 transcript was reported stenographically by me, was  
14 thereafter reduced to typewriting under my personal  
15 direction, and constitutes a true record of the  
16 testimony given and the proceedings had;

17 That the said deposition was taken  
18 before me at the time and place specified;

19 That I am not a relative or employee  
20 or attorney or counsel, nor a relative or employee  
21 of such attorney or counsel for any of the parties  
22 hereto, nor interested directly or indirectly in the  
23 outcome of this action.

24 IN WITNESS WHEREOF, I do hereunto

1 set my hand and affix my seal of office at Chicago,  
2 Illinois, this 11th day of December, A.D. 2016.

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5 Notary Public,

6 DuPage County, Illinois.

7 My commission expires 11/13/19.

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9 CSR Certificate No. 84-3404

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