Exhibit 15

Redacted Version of Document Proposed to be Filed Under Seal

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

CHROMADEX, INC.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.
	)	SACV 16-02277-CJC(DFMx)
ELYSIUM HEALTH, INC.,	)	
	)	
Defendant.	)	
	)	
ELYSIUM HEALTH, INC.,	)	
	)	
Counterclaimant,	)	
	)	
vs.	)	
	)	
CHROMADEX, INC.,	)	
	)	
Counter-Defendant.	)	

DEPOSITION OF

[redacted]

NOVEMBER 28, 2018

Reported by:
VICTORIA RUSSO, CSR
No. 18-72093

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

CHROMADEX, INC., Plaintiff, vs. ELYSIUM HEALTH, INC., Defendant.	Case No. SACV 16-02277-CJC(DFMx)
ELYSIUM HEALTH, INC., Counterclaimant, vs. CHROMADEX, INC., Counter-Defendant.	

VIDEOTAPED DEPOSITION of [redacted], taken on behalf of the Plaintiff, at [redacted], [redacted] at 9:19 a.m., on Wednesday, November 28, 2018, before Victoria Russo.

high pressure liquid chromatography; did I say that right?

A. You certainly did.

Q. So what is this document then?

MR. PERGAMENT: Objection to the form.

A. This document is the outline of the analytical method. It is a -- just a two-page synopsis, if you will, basically giving you the basic information, conditions, the preparation of the sample, the mobile phase, and how to operate the instrument to give you a desired result.

Q. Are all those things necessary steps in an HPLC analytical method?

A. Yes.

Q. Are there any additional steps that are not discussed in this document?

A. This document is analogous to the process document that you gave me previously. They are a general description. This is not a document that you can go to the laboratory and conduct tests with. It's a good starting point. There is a lot of good information here. Certainly, it makes things easier and quicker for sure rather than developing from scratch but my team is adapted to developing

analytical methods from scratch or using customer information to develop methods, okay.

Just so you understand, we would take this information and one of our methods development scientist would look at this. Actually we would do it in the laboratory and we would set up an instrument and we would try this, really what we would call quick and dirty, and we would see if it works and I've never seen an HPLC method be transferred and work the first time.

So our method development scientists, it's their job to take a document like this, take various samples. You know, it's several months of work to finally come up with a method that is fully developed, validated and put into a form in which a technician can then take that SOP and do the testing.

Q. So when you say "this is good information" --

A. It is very good.

Q. What do you mean by "very good information"?

A. Well, you have got a solution preparation, right, layout here. You've got the actual method for preparing the sample, which detector you want to use, the concentration of the

Q. And he wouldn't give them to you for that reason?

A. Yes, he couldn't.

Q. Do you recall anyone from Elysium ever refusing to give you any other documents because they didn't own them?

A. No, quite frankly, once we initiate a program and we've got whatever we got, we'll assume there is nothing else to be had and we just get on with the project.

Q. One last question about the HPLC method. Do you know if [redacted] ever developed its own internal analytical HPLC method?

A. Oh, absolutely we did, yes.

Q. Do you remember about when that was complete?

A. I don't. It would have been completed just prior to us transferring the process to the plant.

Q. About when was the process transferred to the plant?

A. We started in the laboratory in September of '16. We spent many months in the laboratory. It probably would have been after the first of the year we went to the plant January,

February, I think.

Q. And you said before that every bit of technical information a client can give [redacted] will short-circuit the time, money and investment needed to make the manufacturing process; is that right?

MR. PERGAMENT: Objection to the form.

A. In developmental projects there is a time and materials model. We charge for every hour that a chemist is working on the project and every hour in the analytical method the analyst is working on an analytical method.

So the answer is yes, any technical information that allows us to be more efficient ends up making the project faster and less expensive for the client.

Q. Do you recall any other technical information that Elysium sent you besides the documents and the samples we've just discussed?

MR. PERGAMENT: Objection to the form.

A. I don't recall any technical information today that I received but anything that I received that I would think would be helpful to the project, I would immediately turn over to our

C E R T I F I C A T E

I, VICTORIA RUSSO, a Certified Shorthand Reporter and Notary Public within and for the States of Connecticut, New York, New Jersey, and Massachusetts, do hereby certify:

I reported the proceedings in the within-entitled matter, and that the within transcript is a true record of such proceedings.

I further certify that I am not related, by blood or marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 11th day of December, 2018.

VICTORIA RUSSO, CRR
NOTARY PUBLIC