

Exhibit 11

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

CHROMADEX, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. SACV 16-02277-CJC
)	
ELYSIUM HEALTH, INC.,)	
and MARK MORRIS,)	
)	
Defendant.)	
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ELYSIUM HEALTH, INC.,)	
)	
Counterclaimant,)	
)	
vs.)	
)	
CHROMADEX, INC.,)	
)	
Counter-Defendant.)	
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HIGHLY CONFIDENTIAL ATTORNEY'S EYES ONLY

DEPOSITION OF

RAMON PADILLA

NEW YORK, NEW YORK

MARCH 21, 2019

Reported by:
VICTORIA RUSSO
No. 19-76231

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

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CHROMADEX, INC.,)	
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ELYSIUM HEALTH, INC.,)	
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Counterclaimant,)	
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vs.)	
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CHROMADEX, INC.,)	
)	
Counter-Defendant.)	
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VIDEOTAPED DEPOSITION of RAMON PADILLA, taken
on behalf of the Plaintiff, held at the offices of
Cooley, LLP, 1114 6th Avenue, New York, New York at
9:09 a.m., on Thursday, March 21, 2019, before
Victoria Russo.

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

05:25 1 62, and I believe you relied something to the effect
2 "I think so. I may have seen this once or twice";
3 does that sound familiar to you?

4 A. Yes.

05:25 5 Q. Okay.

6 Now, when you indicated that you had
7 seen this method once or twice, you'll notice there
8 is a confidential marking or a water mark across the
9 document. Is this how you had seen this document in

05:25 10 the past with this confidential water mark in --
11 other than in the context of this deposition
12 obviously?

13 A. No, not to my recollection.

14 Q. Okay.

05:25 15 Now, earlier today Ms. Rios had asked
16 you a question about whether basis ingredients had
17 GRAS and you replied something to the fact of no, I
18 don't believe so.

19 Do you recall the testimony?

05:25 20 A. I do.

21 Q. Okay.

22 Does Elysium have GRAS status for its
23 ingredients, NR and ptero?

24 A. Yes, we do.

05:26 25 Q. Okay. Thank you.

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

05:26 1 MS. GIULIANI: I have no more questions
2 but I do want to state for the record that pursuant
3 to the protective record, all the testimony today
4 should be treated as Highly Confidential Attorney's
05:26 5 Eyes Only until the designation of specific testimony
6 and that's all I have.

7 Thank you.

8 MS. RIOS: I have a couple of follow-up
9 questions.

05:26 10

11

12

EXAMINATION

13

14 BY MS. RIOS:

05:26 15 Q. Mr. Padilla, when did Elysium's
16 ingredients pterostilbene and NR get GRAS status?

17 A. I would have to -- I don't want to rely
18 on memory and say that I know when it was. They were
19 at different times. I don't have the exact dates to
05:26 20 tell you that, when they were.

21 Q. Were you involved in the efforts to
22 complete those documents?

23 A. I could say that I probably was
24 consulted in terms of looking at the documents but
05:26 25 I -- not that I was the one who spearheaded this

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

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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 New York and New Jersey, 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 4th day of April, 2019.



VICTORIA RUSSO
Registration No. 01RU4849015
Notary Public for the State of New York
My commission expires: October 31, 2021
Registration No. 2347397
Notary Public for the State of New Jersey
My commission expires: July 20, 2021