

HISENSE USA CORPORATION vs BRIGHTPLUS VENTURES, LLC
William Bohannon on 09/10/2024

1	UNITED STATES PATENT AND TRADEMARK OFFICE	
2	BEFORE THE PATENT TRIAL AND APPEAL BOARD	
3	HISENSE USA	)
4	Corporation,	)
5		)
6	Petitioner,	)
7		)
8	vs.	) IPR2023-01385
9		)
10	BRIGHTPLUS VENTURES,	) Patent No. 7,690,812
11	LLC,	)
12		)
13	Patent Owner.	)
14		)
15		)
16		)

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1 STATE OF GEORGIA

2 COUNTY OF COBB

3 VIDEOCONFERENCE DEPOSITION OF WILLIAM BOHANNON

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5 Pursuant to Article 8.B of the RULES AND
6 REGULATIONS OF THE BOARD OF COURT REPORTING OF THE
7 JUDICIAL COUNCIL OF GEORGIA, I make the following
8 disclosure:

9 I am a Georgia Certified Court Reporter.

10 I am here as a representative of Huseby Global
11 Litigation.

12 Huseby Global Litigation was contacted by
13 the offices of KILPATRICK TOWNSEND, to provide court
14 reporting services for this deposition. Huseby
15 Global Litigation will not be taking this deposition
16 by O.C.G.A. 15-14-37 (a) and (b).

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1 ON BEHALF OF THE PETITIONER:

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11

12 - - -

13 Videoconference deposition of WILLIAM
14 BOHANNON, taken by the Petitioner, at 1001
15 West Fourth Street, Winston Salem, North
16 Carolina, on the 10th day of September
17 2024, at 3:00 p.m. EST, before Lynne C.
18 Fulwood, Certified Court Reporter.

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HISENSE USA CORPORATION vs BRIGHTPLUS VENTURES, LLC
William Bohannon on 09/10/2024

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1 P R O C E E D I N G S,

2 - - -

3 (It was stipulated by all counsel
4 present, that the Court Reporter is
5 authorized to swear the witness remotely.)

6 WILLIAM BOHANNON,
7 having first been duly sworn, was deposed and
8 examined as follows:

9 EXAMINATION

10 BY MR. MORLOCK:

11 Q Could you state your name for the record,
12 please?

13 A William J. Bohannon.

14 Q Thank you, Mr. Bohannon. I understand
15 you've been deposed a couple of times previously; is
16 that correct?

17 A Yes.

18 Q So I will forego with the initial
19 instructions that we usually give since I suspect
20 you've heard those a couple OF times here lately, but
21 if you have any questions about the proceeding for a
22 deposition via remote, please let us know. And do
23 your best to respond orally so the Court Reporter can
24 keep a clear record.

25 Can you tell me where you are testifying

1 from today?

2 A Whitefish, Montana.

3 Q Do you have any documents in the room
4 with you today?

5 A I have a clean copy of my declaration.

6 Q And your declaration just for the record
7 is Exhibit 2001 and case number IPR2023-01385
8 addressing U.S. Patent No. 7,690,812; is that
9 correct?

10 A And you can see the title page of it.

11 Q Yeah. Could you tell me if my question
12 is correct?

13 A Yes. The '812 patent, correct.

14 Q Okay. And you say that is a clean copy
15 of your declaration in this proceeding?

16 A Yes. I have not taken any notes in here.
17 It's printed out to make it easy for me to look at
18 it.

19 Q Understand. Do you have any other
20 documents there with you?

21 A No.

22 Q Thank you. So you say you have a copy of
23 your declaration. Can you tell me when you began
24 work on that declaration?

25 A Not really. I mean, there's a lot of

1 different IPRs I've worked on so it's been a while.
2 So the signature is -- let me look at the signature
3 page. That will give us a hint. I signed the thing
4 18th December 2023. So probably a couple of months
5 before that, so October-ish, something like that,
6 2023.

7 (Whereupon, Exhibit No. 2006 was
8 previously marked for identification by the
9 court reporter.)

10 BY MR. MORLOCK:

11 Q And do you understand this declaration,
12 it appears to have been submitted twice in this
13 proceeding, once as Exhibit 2001 and at that time
14 around December 18th, and then a second time several
15 months later post institution as Exhibit 2006?

16 A As you can see someone put 2006 on the
17 top here. The document that was submitted twice as
18 2006 and 2001.

19 Q You had no additional opinions between
20 the initial submission of this declaration as Exhibit
21 2001 and then when it was resubmitted as Exhibit
22 2006, correct?

23 A Nothing changed.

24 Q Can you tell me how much time you spent
25 working on this declaration for the '812 patent?

1 A Just a guess. I do a lot of different
2 work so 40 hours perhaps, thereabouts.

3 **Q Can you tell me what you did to prepare**
4 **for your deposition today?**

5 MR. MASSAND: And I'll caution the
6 witness not to divulge the substance of any
7 communications with counsel.

8 A I have --

9 MR. MASSAND: But to the extent you
10 can answer that without doing that, go
11 ahead.

12 THE COURT REPORTER: I'm sorry.
13 Repeat that, Mr. Massand.

14 MR. MASSAND: To the content you can
15 do that with -- answer without divulging
16 the content of any communications with
17 counsel, please go ahead.

18 THE WITNESS: So I reread my
19 declaration. I reread the patent. I
20 reread most of the prior art and, you know,
21 did some conversations with Neal and that's
22 it.

23 BY MR. MORLOCK:

24 **Q When were those -- when you say Neal,**
25 **that's Mr. Massand here defending your deposition?**

1 A Excuse me?

2 Q You say Neal. Are you referring to Mr.
3 Massand, the person defending your deposition?

4 A Yes.

5 Q And when were those conversations with
6 Mr. Massand?

7 A Yesterday for the most part.

8 Q You have a copy of your declaration in
9 front of you. I can drop one into the exhibit
10 viewer, which is the chat on this if you want me to,
11 but I'm fine for you to just look at your paper copy.
12 I assume you prefer to look at that versus an
13 electronic copy, but let me know.

14 A Yeah, I'm good looking at the paper copy.

15 Q Okay. If you want me to drop an
16 electronic copy of your declaration in at anytime,
17 please let me know.

18 A So why don't you put something in there
19 so that if there's any confusion as to which page and
20 paragraph line you're looking at, you can highlight
21 it and show me.

22 Q I can go ahead and send to you what has
23 been previously marked as Exhibit 2006, which is your
24 declaration in the '812 proceeding. Let me know if
25 you're able to receive that.

1 A Looks like it's there. So hopefully when
2 you refer to this thing, it will show up on the
3 viewing page and all that sort of thing like before.

4 Q We can -- if you need me to do a screen
5 share, I can do a screen share. If you prefer to
6 look at it on your screen, that's fine too. You just
7 let me know.

8 A Well, what I would like is for you to be
9 able to show me exactly what you're talking about
10 when you're talking about something in the
11 declaration.

12 Q If I'm talking about something directly
13 about it, I may be able to do that if it relates to
14 your declaration. And for the record, I may from
15 time to time refer to Exhibit 2006 as your
16 declaration. Is that fair enough we'll understand
17 we're talking about Exhibit 2006 when we say your
18 declaration?

19 A Yes.

20 (Whereupon, Exhibit No. 1001 was
21 previously marked for identification by the
22 court reporter.)

23 BY MR. MORLOCK:

24 Q I'm also going to go ahead and drop into
25 what has been previously marked as Exhibit 1001 in

1 this proceeding. Let me know when you get that.

2 A The patent, yeah, I've got it.

3 Q And Exhibit 1001 is U.S. Patent No.

4 7,690,812. Do you have a copy of Exhibit 1001 now?

5 A Yes.

6 Q I may from time to time today refer to
7 Exhibit 1001 as the '812 patent. Fair enough, you'll
8 understand we're talking about Exhibit 1001 if I do
9 that?

10 A I will.

11 Q Could I have you look on page one of
12 Exhibit 1001?

13 A So I'm there.

14 Q Do you see at the top left column there's
15 a list of three inventors in Exhibit 1001?

16 A Yes.

17 Q You see the first inventor is John K.
18 Roberts?

19 A Do you want me to confirm that for you or
20 something?

21 Q Yes.

22 A Well, let's just read them off and save
23 time. John K. Roberts, Chenhua You and Paul Sims.
24 Looks like Cree is the assignee.

25 Q Thank you. Have you ever spoken to John

1 K. Roberts?

2 A No.

3 Q You didn't speak to John K. Roberts in
4 connection with preparing any of your opinions for
5 this proceeding, correct?

6 A That's correct.

7 Q Do you know --

8 A (Inaudible) created the fairly famous
9 laser or LED company, so there's probably some small
10 chance I bumped into him at some convention or SID
11 symposium or something like that, but I have not
12 spoken to him. I do not know him other than as the
13 inventor shown here.

14 Q Okay. Is the same true for Chenhua You,
15 you've never spoken to Chenhua You?

16 A Same for all of them. I don't think I've
17 spoken to them. Although like I said, I used to do a
18 lot of SIDs, Society of Information Displays,
19 meetings and conventions and symposium and what not.
20 So I've bumped into a whole bunch of people in my
21 life.

22 Q But fair to say you have no recollection
23 of ever having spoken to or met with any of the three
24 inventors of the '812 patent?

25 A Certainly didn't talk to them about this

1 patent, that's for sure.

2 Q Do you know the level of education of any
3 of the three inventors of the '812 patent?

4 A No. Haven't seen their resumes.

5 Q Can I have you turn to claim one, that's
6 in column 8 and page ten of the '812 patent?

7 A (Witness complies with request of
8 counsel.) Claim one, I'm there.

9 Q Okay. Do you see claim one refers to at
10 the last claim element, the reflector sheet
11 configured to conform to a shape of a protruding
12 feature on the tile?

13 A Yes.

14 Q So what does the term "conform" mean to a
15 person of skill in the art?

16 A Well, that's pretty easy to understand.

17 THE COURT REPORTER: I'm sorry. I
18 can't hear you.

19 THE WITNESS: I would say it kind of
20 presses down around it. There's figures.
21 I mean, you can look at Fig. 2 I think
22 which is a good illustration of conform.

23 BY MR. MORLOCK:

24 Q So your understanding of conform is that
25 when it presses down around a protruding feature?

1 A Yes. But it -- there's no claim
2 construction in my declaration. We just took plain
3 and ordinary meaning and so there's no significance
4 to any kind of claim construction. That's a
5 different argument.

6 Q Okay. So I'm asking though the
7 definition you applied to "conform" or the definition
8 that a person of skill in the art would give to the
9 word "conform" is pressing down around a protruding
10 feature?

11 A Let me state that better. If you look at
12 -- if you look at Fig. 3 on page two -- no, Fig. 4 on
13 page three, that's a good example of conform I think
14 where you can see the reflector sheet is conforming
15 to what's called out as element 18 and you can see
16 how the reflector sheet has kind of molded itself
17 around that protruding element 18.

18 Q So you see that there is a -- you point
19 to a Fig. 4 and say what is shown in Fig. 4 with
20 element 18 the reflector 24 does conform?

21 MR. MASSAND: Objection.

22 A Sorry, I interrupted.

23 BY MR. MORLOCK:

24 Q I'm sorry. Did you say it does?

25 A It appears to conform.

1 Q So the reflector sheet 24 conforms to the
2 element 18 shown in Fig. 4 of the '812 patent,
3 correct?

4 A That's the way I understand it.

5 Q And does -- if we turn back to the prior
6 page at Fig. 3, let me know when you're there.

7 A I'm there.

8 Q Does the reflector sheet in Fig. 3
9 conform to the element 18?

10 A I would say it conforms to element 18 as
11 well here. This case they've dug out a recess in the
12 reflector sheet 14, which is also 24. So it was
13 conforming in a different way through a recessed
14 element.

15 Q And in your opinion a recessed element
16 would conform?

17 A Well, you see -- I mean, we need to read
18 the patent description to understand what their --
19 how precisely they're describing that. But it's
20 another way of conforming. They dug out a little
21 material.

22 Q Okay. So a recess is a way of
23 conforming, correct?

24 A That's kind of my understanding although
25 I didn't go into any detail on claim construction in

1 my opinion. Plain and ordinary language.

2 Q Could I have you turn to column four of
3 the '812 patent, please? It's on page eight.

4 A What was the four?

5 Q Column four, page eight.

6 A Column four, page eight of the patent?

7 Q Correct. The '812 patent.

8 A I'm there.

9 Q I'm looking at -- in column four, about
10 line 45, let me know when you're there.

11 A I'm there.

12 Q Column four describes a solid state
13 lighting device may include, for example, a packaged
14 light emitting device including one or more light
15 emitting diodes.

16 Do you see that?

17 A I do.

18 Q What is a packaged light emitting device?

19 A Well, I think it's an LED in some kind of
20 semiconductor package.

21 Q When you say some kind of semiconductor
22 package, what do you mean by some kind of
23 semiconductor package?

24 A Well, you can have a varied chip, so LEDs
25 are made on a wafer through semiconductor processors.

1 Then the wafer is sliced and diced and packaged and
2 put in a package with interconnect. Sometimes they
3 use some kind of a surface optical element or some
4 kind of passivation or some other material on the
5 light emitting side of it.

6 So it could be anything from more varied
7 chip like things connected up electrically to
8 something -- some kind of a thing with some kind of a
9 lens on it or a transparent covering or something.
10 So there's a wide range of packaging that can be done
11 to LEDs.

12 Q Okay. So an LED package could include a
13 transparent covering or a lens covering, correct?

14 A I've seen such things. The claims aren't
15 limited to anything like that.

16 Q So an LED could include a packaged
17 covering that would be like a transparent plastic
18 cover?

19 A That's probably one example.

20 Q Okay.

21 A I mean, if you look at Fig. 3 and Fig. 4,
22 it shows the light emitter 22 and it points out -- or
23 light emitter 20 that points out the individual chip
24 22 in the package. So you can -- in the package
25 looks like some kind of hemispherical shape in

1 drawing 3 -- in Fig. 3 and Fig. 4. So what I just
2 described is shown in Fig. 3 and Fig. 4 as well as
3 Fig. 5A and B.

4 Q So you would -- your testimony is that
5 Figs. 3, 4 and some of the other figures in the '812
6 patent show an LED package with what appears to be a
7 plastic bulb covering over top of the LED chip?

8 A Well, I wouldn't know about plastic but
9 it looks like some kind of covering. See it says
10 that on column four. If you go back to column four
11 of the -- of the thing where -- of the '812 patent
12 where it says -- about line 57 it says, the emitter
13 20 can include one or more LED emitter chips that are
14 configured to emit light having one or more
15 wavelengths. So it's calling out element 20 and
16 element 22.

17 Q Turn to column five, which is on page
18 nine of the '812 patent.

19 A I'm there.

20 Q If you look in column five at
21 approximately line 45, there's a paragraph that says:
22 Solid state lighting bar can also include one or more
23 large wire interconnects 18 that can be positioned,
24 for example, proximate to an insulating plug 16.

25 You see that?

1 A I do.

2 Q The next sentence says: The large wire
3 interconnect 18 is but one example of a surface
4 protrusion that can occur on the surface of the tile
5 substrate.

6 A I see that.

7 Q What are some other examples of a
8 protrusion that can occur on the surface of a tile
9 for light emitting diodes?

10 A Well, protrusions aren't just -- so if
11 you go back to column four where it talks about the
12 substrates can also include. So this is about line
13 52. So the substrate 13A and B can also include
14 surface protrusions such as large wire interconnect
15 18, used to provide electrical connection adjacent to
16 the large wire interconnect 18 can be an optional
17 insulating plug that can mechanically join and
18 electrically insulate adjacent tiles. The large wire
19 LWI 18 may also -- or may be electrically insulated
20 and/or protected from environmental exposure with
21 passivation or encapsulation material including, for
22 example, silicone, not shown. So that's pretty
23 clear.

24 Q So what are some other examples of
25 protrusion on the surface of the tile substrate?

1 A I'm not going to speculate. It's not in
2 my declaration.

3 **Q Well, your declaration addresses the '812**
4 **patent, correct?**

5 A Yes, but I'm addressing the '812 patent
6 as I just said and beyond -- you want me to provide
7 some kind of speculation beyond what's shown in the
8 '812 and I'm not willing to do that if it's not in my
9 declaration.

10 **Q So would you say a LED on the surface of**
11 **a tile is a protrusion?**

12 A An LED is the light emitter. So we're
13 already talking about the light emitter. So reading
14 from column four, solid state lighting -- solid state
15 lighting tile substrate corresponds includes a solid
16 state emitter. The tiles can also include a solid
17 state emitter mounted on the surface of the
18 substrate. So there's an emitter and then there's a
19 protrusion.

20 **Q But an emitter protrudes, correct?**

21 A They're separate.

22 **Q Do you agree that an emitter would**
23 **protrude from the surface on which it is mounted?**

24 A No, I do not. The claims are quite
25 specific. The claim is showing -- if you read claim

1 one again, back around line 41 or so, it says, a
2 solid state lighting element mounted on a surface of
3 the substrate and reflector sheet on the surface of
4 the substrate. The reflector sheet configured to
5 conform to the shape of a protruding feature on the
6 tile.

7 So it's quite clear the way the claims
8 are written that they're two separate elements.
9 There's a solid state lighting element, one; and a
10 protruding feature, two; so they're separate.

11 Q What does the word "protrude" mean?

12 A I mean we all know what protrude means.
13 It's plain and ordinary language.

14 Q So why don't you tell me what your
15 definition of the word "protrude" is?

16 A Well, in the context of this patent, it's
17 something like a large wire interconnect with some of
18 the other things that I read off to you earlier, the
19 subset is used to attach parts together.

20 Q Does protrude mean to extend from the
21 surface up?

22 A I'm not going to speculate with you.

23 Q So in your opinion, does the word
24 protrude include things that extend from the surface
25 of a feature?

1 A That's not in my opinion.

2 THE COURT REPORTER: I'm sorry, the
3 answer please?

4 THE WITNESS: That's not in my
5 opinion, not in my declaration.

6 BY MR. MORLOCK:

7 Q I'm asking you a simple yes or no
8 question that involves issues that I do think are
9 addressed in your declaration, and I would like an
10 answer to my question. Does the word "protrude"
11 include things that extend from the surface of a
12 feature?

13 MR. MASSAND: Objection to form.

14 A That's not in my opinion. If you think
15 it's covered in my opinion, point me to the page and
16 line, please.

17 BY MR. MORLOCK:

18 Q You're more than welcome to review your
19 declaration. You have a copy of it in front of you.
20 I'd like an answer to my question.

21 A I'm not going to answer.

22 Q You're -- so I just want to make sure we
23 have a clear record. You're refusing to answer
24 whether the word or the phrase "protrude from a
25 surface" means to extend from a surface?

1 A I'm not going to agree with your
2 construction. It's not a part of my opinion.

3 MR. MASSAND: Objection.

4 BY MR. MORLOCK:

5 **Q I didn't ask you to agree to my**
6 **construction. I asked you to answer a question. Can**
7 **you answer that question?**

8 A You want me to agree to your version of
9 claim construction and I'm not willing to do that. I
10 mean, we can have a claim construction argument and
11 session and go through the -- you know, get prepared
12 for the Markman hearing and all that other stuff.
13 That's an entirely --

14 **Q So --**

15 A -- deposition.

16 MR. MORLOCK: Neal, we can address
17 this a lot of ways. I mean, do you want
18 the witness to answer the question or do
19 you want us to seek to exclude his
20 testimony?

21 MR. MASSAND: He's given you his
22 answer. If you want to try to exclude him,
23 go ahead.

24 MR. MORLOCK: Understand we'll --

25 MR. MASSAND: What are you trying to

1 get him to do? Claim construction wasn't
2 addressed in his opinion. So why are you
3 trying to get him to do claim construction?

4 MR. MORLOCK: So all right. I
5 understand your position, Neal. We will
6 continue with our examination and we'll see
7 how we address it. If Mr. Bohannon is
8 unwilling to answer questions, then Mr.
9 Bohannon is unwilling to answer questions
10 and we can address that.

11 MR. MASSAND: If you ask questions
12 within the scope of his declaration, he
13 will answer.

14 THE WITNESS: Yes. Ask me something
15 about my declaration or the patent.

16 BY MR. MORLOCK:

17 Q I'm asking you about the '812 patent.
18 The '812 patent uses the word "protrude," correct?

19 MR. MASSAND: Going back to what we
20 were talking about?

21 MR. MORLOCK: Neal, please stop
22 speaking. Make your objections.

23 MR. MASSAND: You're the one who spoke
24 to me.

25 MR. MORLOCK: Neal, if you want to

1 make an objection, make an objection but do
2 not --

3 MR. MASSAND: You're the one who spoke
4 to me.

5 MR. MORLOCK: Neal, I'm not speaking
6 to you. I am asking the witness a
7 question.

8 MR. MASSAND: You already spoke to me.

9 MR. MORLOCK: Please stop your
10 speaking objections. I'm happy to call the
11 board and getting a ruling on this.

12 MR. MASSAND: Go ahead.

13 BY MR. MORLOCK:

14 Q So Mr. Bohannon, the claim -- claim one
15 of the '812 patent uses the word "protruding",
16 correct?

17 A So claim one says reflector sheet is
18 configured to conform to a shape of a protruding
19 feature on the tile.

20 BY MR. MORLOCK:

21 Q So you agree, yes or no, that the word
22 "protruding" appears within claim one of the '812
23 patent?

24 A So a reflector sheet on the surface of
25 the substrate. The reflector sheet configured to

1 conform to the shape of a protruding feature on the
2 tile. That's plain language.

3 Q Thank you for reading the claim language.

4 I'm --

5 A You're welcome.

6 Q -- asking a simpler question. Do you
7 agree with me, yes or no, that the word "protruding"
8 appears within claim one of the '812 patent?

9 MR. MASSAND: Objection to form.

10 A So there it says that the reflector sheet
11 configured to conform to the shape of a protruding
12 feature on the tile. It's nice plain language.

13 BY MR. MORLOCK:

14 Q Okay. So --

15 A It seems to be --

16 Q I'm asking a yes or no question. Does
17 the word "protruding" appear within claim one of the
18 '812 patent?

19 MR. MASSAND: Objection to form.

20 A So I am reading claim one. So a solid
21 state lighting tile comprising a substrate and solid
22 state lighting element mounted on a surface of the
23 substrate and the reflector sheet on the surface of
24 the substrate, the reflector sheet configured to
25 conform to a shape of a protruding feature on the

1 tile. That's claim one.

2 So you can take any kind of answer you
3 want as to what the words are in that claim. There's
4 a whole bunch of words in there.

5 Q So are you able to answer a yes or no
6 question as to a word that is in claim one of the
7 '812 patent?

8 A So I will read to you all the words that
9 are in here and you can count. You can take note of
10 any of the words that I have read and answer your own
11 question.

12 The solid state lighting tile comprising
13 a substrate, a solid state lighting element mounted
14 on a surface of the substrate, and reflector sheet on
15 the surface of the substrate, the reflector sheet
16 configured to conform to a shape of a protruding
17 feature on the tile.

18 Q So the last five or six words you read
19 were "a protruding feature on the tile," correct?

20 A So a reflector sheet configured to
21 conform to a shape of a protruding feature on the
22 tile. Why don't we just read the claim language
23 alone? I mean, this is not a claim construction
24 argument.

25 Q So --

1 A My declaration -- in my declaration it
2 says quite clearly we're taking plain language. I'll
3 find it and read it to you.

4 Q If you'd like to read that to me from
5 your declaration, certainly you have your declaration
6 in front of you. You're welcome to refer to it at
7 any time.

8 A I'm going to read it to you so that we're
9 all clear. Claim construction. So I'm looking at
10 paragraph 35 in my declaration, page ten, for IPR
11 petitions filed after November 13th, 2018, I
12 understand the Patent Trial and Appeals Board
13 construes claim terms as having an ordinary and
14 customary meaning to a person of ordinary skill in
15 the art at the time of the invention.

16 The same standard is used in district
17 court. I have applied this standard in rendering my
18 opinions on claim construction. In addition I have
19 been asked to assume that the claims are not
20 indefinite. So there we go.

21 Q So you say you have applied this standard
22 in rendering my opinions on claim construction,
23 paragraph 35 of your declaration, correct?

24 A Yes.

25 Q And that standard is terms as having

1 their ordinary and customary meaning to a person of
2 ordinary skill in the art at the time of the
3 invention, correct?

4 A Yes.

5 Q So in your opinion, what is the meaning
6 that a person of ordinary skill in the art at the
7 time of the invention would have applied to the claim
8 term "protruding"?

9 MR. MASSAND: Objection to form.

10 A So that opinion is not in my declaration.
11 I don't have a specific opinion on a particular term.
12 I don't have a -- I don't have a section in here that
13 says, you know, what the claim constructions are word
14 by word.

15 BY MR. MORLOCK:

16 Q Let me -- let me ask this a different way
17 and make sure we have -- so the record is clear.

18 A Please.

19 Q You say I have applied this standard,
20 meaning the customary meaning -- the ordinary and
21 customary meaning to a person of ordinary skill in
22 the art at the time of the invention to the claim
23 terms addressed -- or to the claims addressed in your
24 declaration, correct?

25 A So let's -- to be clear, so I say that I

1 understand that claim terms in the patent are given
2 their ordinary and customary meaning as understood by
3 a person of ordinary skill in the art in the context
4 of the entire patent and prosecution history
5 pertaining to the patent. If the specification
6 provides a special definition for a term that differs
7 from that meaning the term would otherwise possess,
8 the specification's special definition controls. I
9 have applied these standards in preparing my opinions
10 for this declaration.

11 That's paragraph 17, claim construction.

12 **Q Okay. I'm looking at page ten under the**
13 **section that says claim construction. Do you see**
14 **that?**

15 **A I'll go there again. So there we are.**

16 **Q Okay. So look at paragraph 35.**
17 **Paragraph 35 of your declaration says, I understand**
18 **the patent trial and appeal board construes claim**
19 **terms as having their ordinary and customary meaning**
20 **to a person of ordinary skill in the art at the time**
21 **of the invention, correct?**

22 **A That's the way the sentence reads.**

23 **Q I have applied this standard in rendering**
24 **my opinions on claim construction, correct?**

25 **A That's the way the sentence reads.**

1 Q So in your opinion, what is the ordinary
2 and customary meaning of the term "protruding" as
3 used in claim one of the '812 patent?

4 MR. MASSAND: Objection to form.

5 A So there is no part of my declaration
6 that defines words that does, you know, the typical
7 type of claim construction argument. That's an
8 entirely different proceedings. I've done claim
9 construction arguments for people and done claim
10 construction opinions for people. And I've done work
11 on Markman hearings and they're a completely
12 different process and a different declaration. It's
13 not this declaration.

14 (Inaudible) my declaration that defines
15 what these words are. I don't try to limit. Any
16 kind of opinion that I -- that you would try to
17 extract from me at this point imposes a limitation on
18 the claims. I'm not willing to do that. It's not in
19 my declaration.

20 Q So let me ask this a different way, too,
21 then. If we turn to the heading on page 15, let me
22 know when you're there.

23 A Tabito?

24 Q I'm looking at page 15. There's a
25 heading just above paragraph 54 that reads: Chou

1 does not disclose the reflector sheet configured to
2 conform to a shape of a protruding feature on the
3 tile as recited in claim 1C and 15C.

4 Do you see that?

5 A I do.

6 Q And is that -- is that your opinion
7 accurately stated on page 15?

8 A That's my opinion. Chou does not
9 disclose the reflector sheet configured to conform to
10 the shape of a protruding feature on a tile as
11 recited in claim 1C and claim 15C.

12 Q So it does -- what definition did you
13 apply to the word "protruding" in coming to your
14 opinion with respect to Chou?

15 MR. MASSAND: Objection.

16 A Plain and ordinary meaning.

17 BY MR. MORLOCK:

18 Q And what is the plain and ordinary
19 meaning you applied to the term protruding in coming
20 to your opinion regarding Chou?

21 MR. MASSAND: Objection to form.

22 A That's not in my declaration. There's
23 nothing in my declaration that lists all the various
24 claim terms in their plain and ordinary meaning.
25 Generally when I've done claim construction arguments

1 for people, if something is plain and ordinary
2 meaning, you do not assign a definition to it. You
3 only assign a definition to terms that you argue are
4 not plain and ordinary meaning.

5 BY MR. MORLOCK:

6 Q Are you able to tell me what the plain
7 and ordinary meaning of the term "protruding" as used
8 by the claims of '812 patent is?

9 MR. MASSAND: Objection to form.

10 A I am not willing to do that because it's
11 outside the scope of my declaration.

12 BY MR. MORLOCK:

13 Q So you're -- let me make sure just so we
14 have a clear record. You're not willing to tell me
15 what the plain and ordinary meaning of the term
16 "protruding" is as it is used within the claims of
17 the '812 patent, correct?

18 MR. MASSAND: Objection to form.

19 A Because that would imply a limitation to
20 the claims and I do not want to limit the claims.
21 You want to limit the claims. I do not want to limit
22 the claims.

23 BY MR. MORLOCK:

24 Q So can you tell me what the plain and
25 ordinary meaning of the term "substrate" is as used

1 by claim one of the '812 patent?

2 A The same argument. That's not in my
3 declaration. We're taking plain and ordinary meaning
4 for all the claim terms. We're not limiting them to
5 some terminology that you are trying to force out of
6 me. It's not going to work.

7 Q So you can't tell me what the plain and
8 ordinary meaning of the term "substrate" as used by
9 claim one of the '812 patent is, correct?

10 A That's not true. It's not that I can't.
11 It's that I don't want to. I am unwilling to because
12 you want me to limit the claims and I'm not willing
13 to limit the claims.

14 BY MR. MORLOCK:

15 Q Ah, okay. That's a fair distinction.
16 You are unwilling to tell me the plain and ordinary
17 meaning as used by you in your declaration in
18 applying the claim term "substrate" as used in claim
19 one of the '812 patent, correct?

20 A No.

21 MR. MASSAND: Objection to form.

22 BY MR. MORLOCK:

23 Q Okay. What -- so are you saying you
24 can't or you're unwilling to tell me the plain and
25 ordinary meaning of the term "substrate" as used by

1 claim one of the '812 patent?

2 A I want to read to you this claim
3 construction section six in my declaration where --
4 maybe we can read paragraph 36 for you. Claim terms
5 are generally given their plain and ordinary meaning
6 which is the meaning that the term would have to a
7 person of ordinary skill in the art in question at
8 the time of the invention. When the words in the
9 context of the surrounding claim language make the
10 ordinary meaning readily apparent, claim construction
11 involves little more than the application of the
12 widely accepted meaning of commonly understood words.
13 The claims must be read in view of the specification
14 of which they are a part. The specification is the
15 best source for understanding a technical term.

16 And so if we do that, and then we go look
17 at the '812 patent, and I'd like to go back to I
18 think it's in column four, I'm looking for the best
19 part here. So solid state lighting bar 30 as
20 illustrated in Fig. 3 can include a support member of
21 which is provided solid state lighting tile substrate
22 13B that corresponds with lighting tile 12B include
23 -- tile 12B can also include a solid state emitter 20
24 mounted on a surface of the substrate 13B. The
25 emitter can include one or more LED emitter chips

1 that are configured to emit light on one more or
2 wavelengths. The tile also includes reflector sheet
3 14 configured to reflect and diffuse light
4 transmitted by the emitter. The reflector sheet 14
5 can be configured to cover multiple tiles 12A and B
6 of the solid state lighting panel. The substrates
7 can also include surface for intrusions such as, for
8 example, large wire interconnect, (LWI) 18. A LWI 18
9 can be used to provide electrical interconnections to
10 the tiles.

11 So I think if you read those couple of
12 paragraphs on column four, from about line 46 on
13 down, you'll understand and a person of ordinary
14 skill in the art would understand everything they
15 need to know about claim one and the claim language
16 and the limitations.

17 Q Okay.

18 A There are two elements covered in -- two
19 separate elements. The solid state lighting element
20 on about line 41 of column eight in claim one, so a
21 solid state lighting element mounted on the surface
22 of a substrate and a reflector sheet on the surface
23 and the reflector sheet is configured to conform to
24 the shape of a protruding feature on the tile. In
25 this case the protruding feature is a separate

1 element from the solid state lighting element. So
2 there are two separate things.

3 Q Do you agree that a solid state lighting
4 element extends from the surface of the substrate?

5 A There's nothing in this claim that talks
6 about extending from the surface. There's nothing in
7 the paragraph that I read to you that talks about
8 extending from the surface. You're trying to put
9 limitations that do no exist.

10 Q Does the solid state -- I didn't ask you
11 about specifically the claim language here. What I'm
12 trying to understand is would you agree that a solid
13 state lighting element has dimensions?

14 A So if you want to see what a solid state
15 lighting element looks like, you can look at Fig. 3
16 and Fig. 4.

17 Q So I'm asking a specific question. Would
18 you agree to me that -- with me that a solid state
19 lighting element is a three-dimensional component?

20 MR. MASSAND: Objection to form.

21 A I'm not really willing to agree to you
22 with much, you know. Ask me a question about my
23 declaration.

24 BY MR. MORLOCK:

25 Q So I'm -- does a solid state lighting

1 element have three dimensions? Yes or no?

2 A Let me see how the inventor is describing
3 it again. So Fig. 3 -- I'm reading from column two
4 about line 50. Fig. 3 is a side cross-sectional view
5 of a solid state lighting bar in accordance with some
6 embodiments of the invention. Fig. 4 is a partial
7 side cross-sectional view of a solid state lighting
8 bar taken along lines A-A of Fig. 1 illustrating a
9 reflector sheet according to some embodiments of the
10 invention.

11 So you can draw whatever conclusions you
12 want from the figures. I'm not willing to provide
13 limitations to my opinion in the claims.

14 Q Okay. So do you agree with me that an
15 LED emitter chip is a physical component?

16 A I'm not sure what you mean.

17 Q Does it exist? Does it have mass?

18 THE COURT REPORTER: Does it have
19 what?

20 MR. MORLOCK: Mass.

21 THE COURT REPORTER: Thank you.

22 A So that's an awfully strange question.

23 BY MR. MORLOCK:

24 Q Are you able to answer it? Does an LED
25 emitter chip have three dimensions?

1 A So it's not the able to answer that's a
2 problem. It's the willingness to answer. So you're
3 -- nowhere in my declaration do I discuss the
4 physical properties of LEDs. I don't talk about mass
5 and dimensionality of various parts in here.

6 **Q Your declaration does discuss LEDs**
7 **though, correct?**

8 A Okay. Pick a page and paragraph number
9 and let's talk about my declaration. That would be
10 great.

11 **Q Okay. But you agree with me that your**
12 **declaration discusses LEDs. You have your**
13 **declaration in front of you. You're welcome to look**
14 **at any point you want.**

15 A All right. I'll go back and read it to
16 you again. Let me find a good spot to read.

17 **Q I don't think you need to read. I'm just**
18 **asking do you agree that your declaration addresses**
19 **LEDs? Yes or no?**

20 A I'm not willing to agree to some strange
21 question that's going to limit the claims.

22 **Q So you don't agree that your declaration**
23 **addresses LEDs?**

24 A No. That's not what I said at all. I
25 said I'm not willing to limit the claims. You're

1 trying to get me to say something that you can use to
2 do some kind of claim limitation argument. I'm not
3 willing to do that.

4 **Q Does your declaration use the word "LED"?**

5 A So the '812 patent's overview. The '812
6 patent applies to a solid state lighting tile that
7 includes a substrate, solid state lighting elements,
8 mount of the substrate and a reflector on the surface
9 of the substrate as shown in Fig. 3 of the '812
10 patent.

11 This is from page seven. So you can see
12 all those elements on there. Draw your own
13 conclusions as to what you think they're doing and
14 get your expert to put them in his declaration.

15 **Q I see. You just pointed me to paragraph**
16 **27 of your declaration, correct?**

17 A I pointed you to paragraph 27.

18 **Q In paragraph 27 the first full sentence**
19 **says: Solid state light elements mount of the**
20 **substrate. Correct?**

21 A Yes.

22 **Q So a solid state light element, do you**
23 **agree that a solid state light element has dimensions**
24 **in the X, Y and Z axis?**

25 A So why do I have to agree to such a silly

1 question? You're just trying to trick me into some
2 kind of a claim limitation and I'm not willing to do
3 that.

4 Q I'm asking a simple question. Are you
5 able to tell me what a solid state light element as
6 you've used in paragraph 27 of your declaration,
7 would a person of ordinary skill in the art recognize
8 that that solid state light element has three
9 dimensions?

10 MR. MASSAND: Objection.

11 A Well, the problem I have with your
12 question is you want to know if I'm able to. It's
13 not a question of able or not able. It's a question
14 of willing or not willing. And I'm not willing to
15 fall into your claim limitation arguments.

16 BY MR. MORLOCK:

17 Q So you're not willing to answer whether a
18 solid state light element as used by paragraph 27 of
19 your declaration has three dimensions, correct?

20 A I'm not willing to fall into your claim
21 construction argument. I mean, you want to do claim
22 construction, that's a different process. You guys
23 know how to do that. You want to have a Markman
24 hearing, you got to file and get the Court to agree
25 and then we can have at it, do claim construction all

1 day long.

2 Q So we're in a -- you recognize this is a
3 proceeding before the United States Patent Office,
4 correct?

5 A The Patent File and Appeal Board.

6 Q Correct. You understand this is pending
7 before the Patent Trial and Appeal Board, correct?

8 A Yes, I understand.

9 Q And you have offered a declaration in
10 this proceeding, correct?

11 A Yes, we're talking about it.

12 Q And paragraph 27 of your declaration uses
13 the word "solid state light element," correct?

14 A Yes.

15 Q And you're unwilling to tell me whether a
16 person of ordinary skill in the art would recognize
17 that a solid state light element is a
18 three-dimensional component, correct?

19 MR. MASSAND: Objection to form.

20 A You're trying to get me to fall into one
21 of your claim construction arguments and I'm not
22 willing to do that.

23 BY MR. MORLOCK:

24 Q So my last question again: You are
25 unwilling to tell me whether or not a solid state

1 light element has three dimensions, correct?

2 MR. MASSAND: Objection to form.

3 A I am not willing to fall into your claim
4 construction argument.

5 BY MR. MORLOCK:

6 Q Does the lighting tile as used in
7 paragraph 27 of your declaration have three
8 dimensions?

9 A So we can look at the patent. Let me get
10 the patent up here. So you can see from Fig. 2 which
11 is a plane view, Fig. 3 which is a cross-sectional
12 view and Fig. 4 which is the cross-sectional view and
13 you can draw your own conclusions.

14 Q Well, so Fig. 3 of the '812 patent shows
15 a reflector sheet 14, correct?

16 A So Fig. 3, so claim construction 14 also
17 shows substrate 13, the tile 12A, tile 12B and --

18 THE COURT REPORTER: I'm sorry, I
19 can't hear you.

20 THE WITNESS: It shows on the right
21 side, it shows 14, 13B and 10. It shows a
22 bunch of elements.

23 MR. MORLOCK: Ms. Fulwood, were you
24 able to get that?

25 THE COURT REPORTER: It shows on the

1 right side, it shows 14, 13B and 10. It
2 shows a bunch of elements.

3 Is that correct? Is that what you
4 said, sir?

5 THE WITNESS: That's correct.

6 THE COURT REPORTER: Thank you.

7 MR. MORLOCK: Thank you, Ms. Fulwood.

8 So you -- so we agree that Fig. 3
9 shows among other elements a reflector
10 sheet 14, correct?

11 A There's a (inaudible) 14. It describes
12 that as reflector sheet just to be absolutely clear
13 because I know you want clarity.

14 BY MR. MORLOCK:

15 Q Is your answer complete, Mr. Bohannon? I
16 don't want to speak over you.

17 A I'm looking further. So anyway that part
18 of column four that I was reading to you before from
19 about line 46 on down towards the bottom of the
20 column, what's going on in Fig. 3 is stated in Fig.
21 3, can include a support member 10, on which is
22 provided solid state lighting tile substrate 13B that
23 corresponds to solid state lighting tile 12B. The
24 tile 12B can also include a solid state emitter 20
25 mounted on a surface of the substrate 13B. The

1 emitter 20 can include one or more LED emitter chips
2 22 that are configured to emit light having one or
3 more wavelengths.

4 The tile 12B also includes a reflector
5 sheet 14, configured to reflect and diffuse light
6 transmitted from the emitter 20. The
7 reflector sheet 14 can be configured to cover
8 multiple tiles 12A, 12B of the solid state lighting
9 panel 40. The substrates 13A, 13B can also include
10 surface protrusions, such as, for example, a large
11 wire interconnect (LWI) 18.

12 So everything you need to know is in
13 those few lines.

14 Q Okay. So I appreciate you reading a
15 paragraph that is not related to this, but my
16 question for you is: The '812 patent refers to a
17 reflector sheet 14. In practice if a device was
18 built that included a reflector sheet 14, would that
19 reflector sheet include multiple dimensions or would
20 it be only a two-dimensional component?

21 MR. MASSAND: Objection to form.

22 A So you're asking a really crazy question
23 like how many dimensions are there in reality. Why
24 do you come up with these things?

25 BY MR. MORLOCK:

1 **Q Are you able to answer my question?**

2 A It's not a question of able. It's
3 willingness. And you're asking what I consider
4 almost crazy questions like how many dimensions are
5 there in space.

6 **Q Well, would a reflector sheet 14 as**
7 **described in the '812 patent have three dimensions,**
8 **yes or no?**

9 MR. MASSAND: Objection to form.

10 A So that's a really crazy question. Why
11 are you asking such crazy questions?

12 BY MR. MORLOCK:

13 **Q So I think you probably --**
14 (Crosstalk.)

15 THE COURT REPORTER: I'm sorry, I
16 can't --

17 BY MR. MORLOCK:

18 **Q Well, Mr. Bohannon, please, sounds like**
19 **you had more to say. You continue. I didn't mean to**
20 **speak over you.**

21 A So look at your desk and tell me how many
22 dimensions there are. How many dimensions are there
23 in your office?

24 **Q How many dimensions are in the room**
25 **you're sitting in right now?**

1 A I live in a three-dimensional world.

2 Q So would you agree with me that any
3 object that exists in the world has at least three
4 dimensions?

5 A I don't know what that has to do with
6 the -- with my declaration. I don't go into the
7 discussion of the nature of space and time and
8 infinity and all that stuff. You're bringing in
9 craziness.

10 Q Okay. So does a physical component in an
11 LED display have three dimensions, yes or no?

12 A That's a crazy question. I'm sorry that
13 you keep asking it.

14 Q Are you able to answer the question?

15 A It's not a question of able. Is it do I
16 want to participate in your craziness.

17 Q So you're not participating in the
18 deposition, correct?

19 MR. MASSAND: Objection.

20 A No, I'm participating. You're not asking
21 questions about my declaration. You're asking
22 questions about the nature of reality in some
23 abstract way and it doesn't make any sense to me.

24 BY MR. MORLOCK:

25 Q Do you understand the question I'm

1 asking?

2 A Of course I do.

3 Q And you're unwilling to answer the
4 question, correct?

5 A I'm willing to answer questions about my
6 declaration. This is supposed to be a cross-exam on
7 the declaration, not on the nature of reality and in
8 some kind of abstract way.

9 Q So I'm not asking you a question about
10 reality. I'm asking you whether a LED chip that
11 would go in a backlight is a three-dimensional
12 component. Are you willing to answer that question?

13 A So is there a statement about the
14 dimensionality of the various components in my
15 declaration? I have read through it several times
16 and I don't see anything in my declaration that talks
17 about whether things have three dimensions or four
18 dimensions or two dimensions or whether we live in a
19 flat land or a three-dimensional world or not. All
20 these philosophical questions that you're bringing up
21 are not in my declaration. I would appreciate a
22 question that addresses the issues raised in the
23 declaration from a practical point, not some abstract
24 area.

25 Q Okay. So you willing to answer the

1 question whether or not an LED chip that goes in a
2 backlight for a display is a three-dimensional
3 component?

4 MR. MASSAND: Objection to form.

5 A So you didn't hear me when I went through
6 that whole monologue about the state of the world and
7 all that stuff. You don't care. You're just going
8 to keep asking the question over and over and over.
9 I mean I would like to say it's been asked and it's
10 been answered. Right now I feel like you're
11 badgering me.

12 BY MR. MORLOCK:

13 Q Well, I'm asking a question that I feel
14 like you are able to answer and I don't understand
15 why you're unwilling to answer it?

16 A It's been asked and answered and you're
17 badgering the witness.

18 Q I don't --

19 MR. MASSAND: He's made clear he'll
20 answer questions about his declaration.
21 This is outside the scope.

22 MR. MORLOCK: Mr. Massand, I would
23 encourage you to keep your objections to
24 the appropriate --

25 MR. MASSAND: You've belabored this

1 point now for over 30 minutes asking the
2 same question over and over again.

3 MR. MORLOCK: And I will cross-examine
4 the witness as I see fit. I would
5 appreciate an answer to the question.

6 MR. MASSAND: That's correct. You're
7 badgering him. You're not asking him --
8 you could easily ask --

9 MR. MORLOCK: So I object to your
10 characterization. That's inappropriate and
11 improper. I would ask you to maintain your
12 objection to the appropriate scope allowed
13 by the Patent Trial and Appeal Board. Can
14 you please do that, Mr. Massand?

15 MR. MASSAND: Again, to the extent if
16 you would bring your questions to the
17 declaration. You are harassing and we'll
18 shut the thing down.

19 MR. MORLOCK: We're talking about the
20 '812 patent. I mean --

21 MR. MASSAND: You're not talking about
22 his declaration. You're going way outside
23 the scope. You can easily ask questions
24 about the declaration.

25 MR. MORLOCK: Mr. Massand, please stop

1 using speaking objection. I have asked
2 multiple times. If you do want to stop the
3 deposition and you want to call the PTAB
4 and you want to have the panel listen in
5 while we go through this deposition we can
6 do that.

7 MR. MASSAND: I'm not opposed.

8 BY MR. MORLOCK:

9 Q So let's move to a different topic, shall
10 we, Mr. Bohannon?

11 A That would be nice as long as it's about
12 my declaration and not some weird abstract stuff.

13 Q Let's talk about claim one again.

14 A Okay. I'm going to turn to claim one.

15 Q It's on page ten, column eight.

16 A That which is claimed, a solid state
17 lighting tile, comprising a substrate, a solid state
18 lighting element mounted on a surface of the
19 substrate, and a reflector sheet on the surface of
20 the substrate, the reflector sheet configured to
21 conform to a shape of a protruding feature on the
22 tile. End of claim one.

23 Q Yeah, you -- thank you. You read claim
24 one, correct?

25 A I tried.

1 Q Claim one does not say any specific

2 direction that light must be reflected correct?

3 A I don't understand what you're getting
4 at.

5 Q So claim one recites a reflector sheet,
6 correct?

7 A A reflector sheet configured to conform
8 to the shape of a protruding feature on the tile.

9 Q Yeah, I agree. Claim one never specifies
10 a direction that the reflector sheet must reflect
11 light, correct?

12 A It doesn't say a whole bunch of stuff.
13 There's a lot of knowledge that's not in claim one.
14 Claim one is a very simple thing.

15 Q So we agree claim one does not recite a
16 direction in which light must be reflected, correct?

17 MR. MASSAND: Object to the form.

18 A Claim one doesn't define light either.

19 BY MR. MORLOCK:

20 Q So does the -- what does the reflector in
21 claim one reflect?

22 A So again, we're getting into the claim
23 construction, claim interpretation argument in
24 your -- I don't know why you're going there.

25 Q So maybe your counsel told you this about

1 a deposition. The way it works is I ask questions
2 and you answer them. I mean if you have questions
3 for me we could -- maybe we can have that afterwards
4 if Mr. Massand is okay. But I'd appreciate you
5 answering the question I ask.

6 The question I'm asking you is -- I think
7 you just said claim one doesn't define the reflector
8 sheet as reflecting light, correct?

9 MR. MASSAND: Objection to form.

10 A So claim one is a solid state lighting
11 tile, comprising a substrate, a solid state lighting
12 element mounted on the surface of the substrate, and
13 a reflector sheet on the surface of the substrate,
14 the reflector sheet configured to conform to a shape
15 of a protruding feature on the tile. And that's the
16 extent of claim one.

17 BY MR. MORLOCK:

18 Q So you intended to read claim one in its
19 entirety, correct?

20 A I thought I did. What did I miss?

21 Q I think you did as well, and I didn't
22 hear anything in what you read about reflecting
23 light, correct?

24 A You don't see anything in there about
25 gravity either.

1 Q So you agree that claim one doesn't
2 expressly recite that the reflector sheet reflects
3 light, correct?

4 A I do not agree with you.

5 Q Okay. Where in claim one you as a person
6 of ordinary skill in the art reading claim one would
7 you understand claim one to require reflecting light?

8 A It says a whole bunch of stuff in here.
9 The world is much larger than this claim. This claim
10 one is a solid state lighting tile, comprising a
11 substrate, a solid state lighting element mounted on
12 the surface of the substrate, and a reflector sheet
13 on the surface of the substrate, the reflector sheet
14 configured to conform to the shape of a protruding
15 feature on the tile.

16 So that's the elements of claim one. So
17 if you've got that stuff, if you have a solid state
18 lighting tile you have a substrate. If you have a
19 lighting element on the surface and if you have
20 reflective sheet on the surface of the substrate
21 where the reflective sheet is continuing to conform
22 to the shape of a protruding feature on the tile, you
23 are infringing this claim.

24 Nowhere in here does it say it's got to
25 be powered on, turned on, powered up, operating,

1 bouncing off the ceiling or anything else. You just
2 have to have these elements in your product and you
3 are infringing this claim.

4 **Q So nowhere in the claim does it require**
5 **that the reflector sheet reflect light in a specific**
6 **direction, correct?**

7 A The claim is as it is. It's a nice,
8 simple claim. Solid state lighting tile, comprising
9 a substrate, a solid state lighting element mounted
10 on the surface of the substrate, and a reflector
11 sheet on the surface of the substrate, the reflector
12 sheet configured to conform to a shape of a
13 protruding feature on the tile. That's it. If you
14 have the element -- each one of these elements in
15 your product or your client does then you are
16 infringing this patent, this claim.

17 **Q Okay. So a person of ordinary skill in**
18 **the art reading claim one would not understand claim**
19 **one to require reflecting light, correct?**

20 MR. MASSAND: Objection to form.

21 A I'm not agreeing with you on any of your
22 claim limitations. All you need to be an infringer
23 of this claim is to have a solid state lighting tile,
24 comprising a substrate, a solid state lighting
25 element mounted on the surface of the substrate, and

1 a reflector sheet on the surface of the substrate,
2 the reflector sheet configured to conform to a shape
3 of a protruding feature on the tile.

4 If you have those elements in your
5 product you or your client are infringing. There's
6 no other limitation unless you want to --

7 BY MR. MORLOCK:

8 Q There's no other limitations in claim
9 one, correct?

10 A I read you claim one.

11 Q A person of ordinary --

12 A So claim one is a solid state lighting
13 tile, comprising a substrate, a solid state lighting
14 element mounted on the surface of the substrate, and
15 a reflector sheet on the surface of the substrate,
16 the reflector sheet configured to conform to a shape
17 of a protruding feature on the tile. Period. If you
18 have those elements you and your client are
19 infringing.

20 Q Claim one doesn't require that the
21 reflector sheets have a specific amount of
22 reflectivity, correct?

23 A Claim one doesn't have the works of
24 Shakespeare either.

25 THE COURT REPORTER: The word what?

1 THE WITNESS: Shakespeare's works in
2 them, the author.

3 BY MR. MORLOCK:

4 Q So claim one doesn't require the
5 reflector sheet have a certain degree of
6 reflectivity, correct?

7 A Claim one doesn't have the works of Carl
8 Marx either.

9 Q Claim one doesn't require the reflector
10 sheet have a certain amount of reflectivity, correct?

11 A So I'll read it again just to be clear.
12 I mean you're -- I don't know why you're making up
13 all this stuff. So let's read claim one. Solid
14 state lighting tile, comprising a substrate, a solid
15 state lighting element mounted on the surface of the
16 substrate, and a reflector sheet on the surface of
17 the substrate, the reflector sheet configured to
18 conform to a shape of a protruding feature on the
19 tile.

20 None of these other limitations you want
21 to impose on claim one exist in claim one. You're
22 going to have to follow your own patent if you want
23 to have those elements.

24 Q So I'm just -- I think what you're saying
25 when you say that claim one doesn't have the -- your

1 testimony is claim one doesn't have the works of Carl
2 Marx within it, correct?

3 A The works, you know, his writing, the
4 canon, doesn't have -- doesn't have, you know,
5 Shakespeare, doesn't have anything other than what I
6 just read to you. Solid state lighting tile
7 comprising a substrate, a solid state lighting
8 element mounted on the surface of the substrate, and
9 a reflector sheet on the surface of the substrate,
10 the reflector sheet configured to conform to a shape
11 of a protruding feature on the tile.

12 Those are the claim elements. Everything
13 else is just dicta.

14 Q So you as a person of ordinary skill in
15 the art would use claim one, correct?

16 A Say that again.

17 Q You reviewed claim one as a person of
18 ordinary skill in the art at the time of the
19 purported invention, correct?

20 A Yes.

21 Q And in your opinion as a person of
22 ordinary skill in the art at the time of the
23 purported invention, claim one doesn't require a
24 reflector sheet. It has a specific amount of
25 reflectivity, correct?

1 A Wrong.

2 Q What element requires a specific level of
3 reflectivity within claim one?

4 A So that's the limitation part of
5 reflectivity, a level of reflectivity in claim one
6 there's no limitation in there. I'll read the claim
7 to you again and you can see if what you want is in
8 there or not, but I think you already know it's not
9 in there. You're just trying to force me or trick me
10 into answering in the affirmative so you get the
11 claim limitations you want. But you're not going to
12 get that.

13 So claim one is a solid state lighting
14 tile, comprising a substrate, a solid state lighting
15 element mounted on the surface of the substrate, and
16 a reflector sheet on the surface of the substrate,
17 the reflector sheet configured to conform to a shape
18 of a protruding feature on the tile. Period. The
19 end. None of those other limitations you want exist.

20 MR. MORLOCK: There was a really loud
21 beep there just a second. I don't know if
22 anybody --

23 MR. MASSAND: Probably my computer.

24 MR. MORLOCK: Okay. Sorry, making
25 sure it wasn't -- we had our fire alarm

1 went off earlier.

2 MR. MASSAND: I don't know how to --

3 MR. MORLOCK: I don't know why that
4 was on my mind, but anyway.

5 I'm actually asking you a question
6 about what is not required by the claim,
7 Mr. Bohannon. If you listen to my question
8 I'm specifically saying claim one does not
9 require a specific amount of reflectivity
10 for the reflector sheet, correct?

11 MR. MASSAND: Objection to form.

12 A You're reading your declaration. That's
13 not in my declaration.

14 BY MR. MORLOCK:

15 **Q Okay. So I'm asking you a question**
16 **about -- your declaration addresses claim one as a**
17 **purported person of ordinary skill at the art at the**
18 **time of the purported invention, correct?**

19 A Let's see exactly how I worded that
20 because you want to impose your will on all of this
21 stuff other than ask about -- ask questions about my
22 declaration. You want to make up hypothetical stuff
23 and ask me questions about your hypothetical
24 speculative construction.

25 So on claim -- paragraph 35 in my

1 declaration filed 13 November I understand the Patent
2 Trial and Appeal Board construes claim terms as
3 having their ordinary and customary meaning to a
4 person of ordinary skill in the art at the time of
5 the invention.

6 Q Okay. And you as a person of ordinary
7 skill in the art at the time of the purported
8 invention reviewed claim one of the '812 patent,
9 correct?

10 A I reviewed it. I read it to you.

11 Q Okay. And would a person of ordinary
12 skill in the art reviewing claim one of the '812
13 patent interpret claim one to require a reflector
14 sheet to have a specific amount of reflectivity?

15 MR. MASSAND: Objection to form.

16 A You are outside the scope of my
17 declaration. There's nothing in my declaration that
18 talks about that kind of stuff. You want me to go
19 outside the scope of the declaration and I'm not
20 willing to do that. You're supposed to ask questions
21 about what's in the declaration, not what's out of
22 the declaration.

23 BY MR. MORLOCK:

24 Q Okay. So you can't tell me whether or
25 not a claim one of the '812 patent requires a

1 specific degree of reflectivity from the reflector
2 sheet, correct?

3 A That's not true. I said I'm not willing
4 to do that. It's outside the scope of my
5 declaration. Why don't you ask a question that's in
6 the scope?

7 Q So you believe whether or not the
8 reflector sheet recited in claim one of the '812
9 patent has a specific required amount of reflectivity
10 that's outside the scope of your declaration,
11 correct?

12 A It's outside the scope of my declaration.
13 It's outside the scope of the patent. I don't think
14 the patent describes what you want it to describe.
15 You're going to have to make up your own patent.

16 Q So if a specific reflector had reduced
17 reflective qualities that wouldn't be within the
18 scope of your declaration, correct?

19 A You just want me to speculate and I'm not
20 willing to speculate.

21 Q Well, I'm asking you if there was a
22 reflector that had some damage to it, that wouldn't
23 be within the scope of your declaration?

24 A So you understand what speculation means?
25 When you say "if there was" you're implying that you

1 want me to speculate.

2 Q So I do understand what speculation means
3 and I'm taking a deposition here and I think I'm
4 entitled to answers to the question that I'm asking.
5 And what I'm asking is if something reduced the
6 surface integrity of a reflector would that reflector
7 still meet claim one of the '812 patent?

8 MR. MASSAND: Objection to form.

9 A You want me to speculate and I'm not
10 going to speculate. Why don't you ask questions that
11 don't require speculation?

12 BY MR. MORLOCK:

13 Q So just make sure I understand. You
14 won't tell me whether or not it is your opinion that
15 if something were to reduce the surface integrity of
16 the reflector whether that would still be a reflector
17 sheet within the scope of the -- of claim one of the
18 '812 patent, correct?

19 MR. MASSAND: Object to form.

20 A So is there anything in my declaration
21 that appears to explain the question that you just
22 asked me? Is there any part of my declaration which
23 I risk -- which I came here to be deposed on that
24 discusses reflectivity or damage or anything else
25 that would impair the reflector sheet? Is there

1 anything in my declaration that you think gives you
2 grounds to ask that question?

3 BY MR. MORLOCK:

4 Q Well, yes, you offered opinions with
5 respect to the '812 patent in your declaration,
6 correct?

7 A There is nothing in the '812 patent that
8 allows you to ask that question as far as I know. I
9 mean you want to talk about the '812 patent. Where
10 in the '812 patent does it talk about the degraded
11 reflector sheet?

12 Q So I'm the one asking questions and
13 you're one answering those questions. Are you
14 willing to cooperate with the way a deposition works
15 when a taking attorney asks questions and you as the
16 witness answer questions?

17 MR. MASSAND: Objection to form.

18 A Well, here's the deal. This is supposed
19 to be a cross-exam on my declaration and you've done
20 everything but ask questions about my declaration.

21 BY MR. MORLOCK:

22 Q You do have a copy of your declaration in
23 front of you, correct?

24 A I can read the whole thing to you if you
25 want.

1 Q You don't need to read it, but you have a
2 copy with you, yes or no?

3 A You know, go back and read the first part
4 when we opened it, this so-called --

5 Q Mr. Bohannon, I'm asking just a simple
6 question. We've established this already. I just
7 want to make sure we're clear. You have a copy of
8 your declaration, a paper copy in your hands right
9 now, correct?

10 A There was sitting down -- it's in my
11 hands now. I'll show you so you can see for
12 yourself.

13 Q We're not on video. You don't need to
14 show me. It's okay. I understand you have a copy.

15 A A copy of my declaration.

16 Q You do have a copy?

17 A Shows the videographer.

18 Q We don't have a videographer present, Mr.
19 Bohannon, so holding up your declaration isn't
20 necessary.

21 A Well, you seem to think that I didn't
22 have it in my hands. So I have it in my hands, so
23 take a look.

24 Q I understand you have a copy. I just
25 want to make sure we're clear. You have a copy and

1 you can refer to it at anytime. Do you understand
2 that?

3 A All right. I'm showing it to you again
4 so you can see for yourself whether or not I have a
5 copy.

6 Q Mr. Bohannon, I'm asking for you to tell
7 me. Do you understand that you have a copy of your
8 declaration with you and that you are free to look at
9 it at anytime during this deposition, correct?

10 A You know that I have been reading from it
11 to you, correct.

12 Q Mr. Bohannon, again, I'm asking -- I just
13 am I'm trying to establish a clear record. Again,
14 the way a deposition works is I as the taking
15 attorney ask you questions and you answer those
16 questions. Are you willing to participate by that?

17 A I am. I've been answering questions even
18 though you haven't asked questions about my
19 declaration. You want to know if I have it or not.
20 I have it. I showed it to you. Yes, I have my
21 declaration. I've read to it you several times so
22 you know. You're just being argumentative and you're
23 badgering me.

24 Q Well, I'm trying -- I'm making sure I
25 understand that you have a copy of your declaration

1 and that you're free to refer to it. I don't want
2 you to suggest that I somehow withheld your
3 declaration from you because we've also introduced
4 one via the exhibit share that you have access to,
5 correct?

6 A I think you're badgering me and you know
7 that I have access to it. We've talked about it.
8 I've showed you. I've read to you from it. You're
9 badgering me.

10 Q Mr. Bohannon, I would appreciate you just
11 answering the questions I'm asking you versus
12 suggesting something inappropriate.

13 A You will stop badgering me and I'll stop
14 saying it.

15 MR. MORLOCK: Well, why don't we take
16 a ten-minute break. We've been going for
17 about an hour and a half. Does that work
18 for you, Mr. Bohannon?

19 THE WITNESS: 15 minutes, please.

20 MR. MORLOCK: 15 minutes is fine.

21 MR. MASSAND: Be back at -- let's make
22 it a quarter till.

23 MR. MORLOCK: Yeah, quarter till works
24 great.

25 (Whereupon, a brief recess was taken.)

1 BY MR. MORLOCK:

2 Q Welcome back, Mr. Bohannon. Can you hear
3 me, Mr. Bohannon?

4 A I can.

5 Q Sorry, we're on video -- or with there
6 not being a videographer sometimes I don't know if
7 everything is connected.

8 Did you speak to anybody during the brief
9 recess we took?

10 A I did not.

11 Q Did you review any documents during the
12 recess we took?

13 A I did not.

14 (Whereupon, Exhibit No. 1006 was
15 previously marked for identification by the
16 court reporter.)

17 BY MR. MORLOCK:

18 Q I'm going to drop into the exhibit share
19 what was previously marked as Exhibit 1006. Let me
20 know when you have that.

21 A I have it.

22 Q Exhibit 1006.

23 A I have it.

24 Q Turn to the first page of 1006. Let me
25 know when you're at that page, please.

1 A The title page.

2 Q And the title of this of Exhibit 1006 is
3 Diffuse Reflective Article, correct?

4 A That appears to be so.

5 Q If -- have you turn to page -- there's
6 page 11 of Exhibit 1006.

7 A So background of the invention?

8 Q Yes, you're on page -- you are on the
9 correct page. Thank you. Could I direct you to
10 paragraph five of Exhibit 1006, please?

11 A Diffuse reflectivity of visible light.

12 Q That's the correct paragraph. Thank you.
13 Paragraph five describes direct view displays used in
14 electronic equipment, correct?

15 A It appears to be so.

16 Q And it describes liquid crystal displays,
17 LTDs, correct?

18 A It appears to be so.

19 Q And it also says reflectivity is
20 particularly critical with backlit direct view
21 displays in battery powered equipment, correct?

22 A It says battery powered equipment where
23 reflectivity improvements directly relate to smaller
24 required light sources and thus lower power demands.

25 Q And in paragraph six says portable

1 computer LCDs are a substantial and demanding market
2 requiring high level of diffuse reflection of visible
3 light from very thin materials, correct?

4 A That's what it appears to say.

5 Q Okay. And if I have you turn to
6 paragraph 19?

7 A Fig. 3.

8 Q Correct. Fig. 3 describes a
9 cross-sectional view of a backlit liquid crystal
10 optional display, correct?

11 A I'm going to look at Fig. 3 and see if I
12 agree with that. Fig. 3 shows something. So
13 paragraph 19, cross-sectional view of a backlit
14 liquid crystal display. I would call it more
15 hypothetical than an actual one. So it's a
16 cross-sectional view of something.

17 Q So you agree with me that paragraph 19
18 says that Fig. 3 is a cross-sectional view of a
19 backlit liquid crystal optical display with a light
20 emitting diode light source utilizing a diffuse
21 reflector, correct?

22 A Well, according to the present invention
23 it is contained as well. So I can read. That's what
24 the words say.

25 Q Okay. So when you look at Fig. 3, you

1 see a row of LEDs labeled as four, correct?

2 A Fig. 3?

3 Q Yes.

4 A I think you're completely wrong.

5 Q Oh, I'm sorry. What do you think I'm
6 completely wrong?

7 A Four is not the LED.

8 Q Okay. What are the LEDs in Fig. 3?

9 A This is kind of a you tell me because
10 it's a very strange arrangement. I've actually never
11 seen one like that before.

12 Q So you see -- have you seen Fig. 3
13 before?

14 A Yes, I've seen Fig. 3, but I'm saying
15 that is an actual device that doesn't exist.

16 Q Okay. And how do you know that the
17 actual device of Fig. 3 does not exist?

18 A I've taken, you know, actually probably
19 thousands of laptop and displays and all that sort of
20 stuff apart and never seen anything like this shown
21 in Fig. 3. This is a hypothetical invention.

22 Q What part of Fig. 3 have you not seen in
23 the thousands that you've taken apart?

24 A The backlight.

25 Q Which part of the backlight in Fig. 3?

1 A I wanted to get to the spot where it
2 describes it. There was a backlight in Fig. 3 in
3 here somewhere. You're going to have to read through
4 the descriptions of Figures 1, Fig. 1 to see what all
5 the various elements are, but the thing with the four
6 on it that you were pointing to as having LEDs in a
7 row is actually a diffuser.

8 Q Oh, well, I think I intended to say 14.
9 I may have said four.

10 A You said four.

11 Q Thank you for catching that. So you
12 would agree with me that Fig. 3 shown in Exhibit 1006
13 shows LEDs 14?

14 A Yeah, I explained those little things off
15 to the side there.

16 Q And 15 is a diffuse reflector?

17 A I think so.

18 Q And paragraph 51 of Exhibit 1006
19 describes materials that can be used to make these
20 reflectors, correct?

21 A I'm going to have to find paragraph 51.

22 Q No problem. It's on page 15 if that
23 makes it faster.

24 A So paragraph 51, polymers from which
25 nonwoven sheet diffuse reflectors according to the

1 present invention can be made --

2 THE COURT REPORTER: I need you to
3 speak up, Mr. Bohannon.

4 THE WITNESS: I was reading the first
5 sentence of paragraph 51, polymers from
6 which nonwoven sheet diffuse reflectors
7 according to the present invention can be
8 made. And then it goes on to describe a
9 bunch of chemical polymers and etcetera.
10 I'm not going to read all that. We'll go
11 crazy trying to decode it.

12 BY MR. MORLOCK:

13 Q Fair enough. But you'd agree with me
14 that paragraph 51 describes polymers from which
15 diffuse reflectors can be made, correct?

16 A So according to the present invention.

17 Q According -- okay. So according to the
18 description of Exhibit 1006 nonwoven sheet diffuse
19 reflectors can be made from a list of materials
20 provided in paragraph 51, correct?

21 A That's what it appears to say.

22 Q Are you familiar with how rigid any of
23 the materials are within paragraph 51?

24 A Well, I've looked at a bunch of polymers
25 and I've looked at a bunch of reflectors and usually

1 fairly flexible. You know, everything is flexible
2 depending on the cross-sectional dimensions and all
3 that sort of stuff. So I'm familiar with them to a
4 degree.

5 Q Okay. So would you agree that any of
6 these materials are rigid?

7 MR. MASSAND: Objection to form.

8 A I don't go into any kind of discussion of
9 these materials on my declaration, so I don't think I
10 can answer that.

11 BY MR. MORLOCK:

12 Q Do you know whether any of these
13 materials are rigid?

14 A I think I answered your question earlier
15 about how the rigidity of plastic depends upon a lot
16 of different things. So I have not done a detailed
17 study of these polymers, so I probably can't answer
18 it precisely. I've looked at thousands of backlight
19 structures and all the various components and then
20 generally speaking in my experience, reflectors are
21 relatively flexible.

22 Q When you say relatively flexible, what do
23 you mean?

24 A So I think bendable for the most part.

25 Q Is there a degree of flexibility you're

1 **able to provide for reflectors?**

2 A No, no. I mean reflectors -- people use
3 everything from paint to paper to plastic to, you
4 know, metal I suppose, although you don't see too
5 many metal reflectors, I mean shiny metal. Usually a
6 diffuse reflector implies a relatively -- kind of a
7 close white structure.

8 **Q Can I have you turn to paragraph 117 of**
9 **Exhibit 1006, please?**

10 A What page?

11 **Q Page 23.**

12 A I'm there.

13 **Q So paragraph 117 describes the use of**
14 **MCPET for a reflection panel, correct?**

15 A Yes, I see that.

16 **Q Are you familiar with MCPET?**

17 A Wasn't that mentioned in the '812 patent?

18 **Q It may be. I don't have a cite off the**
19 **top of my head. Are you familiar with MCPET?**

20 A Let me look it up. Let me look in the --
21 MCPET is in the '812 patent where it says on the '812
22 patent, column five, line eight or so where it's
23 describing the reflector sheet. It says in
24 two-dimensional structure, the reflector sheet 14 may
25 be mounted on multiple bars. The reflector sheet may

1 be may be microcellular polyethylene terephthalate.

2 Probably have to spell that for the Court Reporter.

3 THE COURT REPORTER: I can find it in
4 the patent. That's all right.

5 THE WITNESS: Yeah, if you look in
6 column five, line eight or so you'll see it
7 spelled out. Typical thickness of a
8 millimeter reflective sheet may include
9 recesses configured to provide relief.

10 So anyway they vary to the extent that
11 I see it in the '812 patent. That's
12 probably, you know, that's to analyze
13 whatever reflector, that kind of stuff.
14 But I couldn't describe it in any great
15 detail the physical property.

16 BY MR. MORLOCK:

17 Q But you agree that both the '812 patent
18 and Exhibit 1006 discuss reflectors made out of
19 MCPET, correct?

20 A Yeah, I just showed you where it
21 describes in the '812 patent and I see where it
22 describes in the Starry reference.

23 THE COURT REPORTER: In the what?

24 THE WITNESS: S-T-A-R-R-Y, Starry.

25 That's the inventor of the -- that exhibit

1 we're looking at.

2 BY MR. MORLOCK:

3 Q Exhibit 1006. So you'd agree with me
4 that both Exhibit 1006 and the '812 patent describe
5 reflectors that are made using MCPET, correct?

6 MR. MASSAND: Objection to form.

7 A Yeah, I just -- I just told you where to
8 find it in the '812 patent, manufactured by Furukawa
9 Electric Company in Tokyo, Japan.

10 BY MR. MORLOCK:

11 Q Does the '812 patent say Furukawa?

12 A No, Starry does.

13 Q So MCPET is described as a material to
14 make a reflector in both the '812 patent and Exhibit
15 1006, correct?

16 A As I've answered that already.

17 Q I don't think you have. I'd appreciate a
18 yes or no answer. Is MCPET described as a material
19 to make a reflector in both paragraph 117 of Exhibit
20 1006 as well as column five of the '812 patent?

21 A Column five, line eight in the '812.

22 Yeah, I pointed that out to you.

23 Q Is that a yes?

24 A I answered it the way I answered.

25 MR. MASSAND: Object to form.

1 BY MR. MORLOCK:

2 Q I'm asking for a yes or no answer. Are
3 you able to give me a yes or no answer to this
4 question?

5 A I gave you an answer. I found it in the
6 '812. You asked me if I was familiar with it when
7 you were looking at Starry and I said yes, I think
8 it's in the '812. So I found it for you in the '812.

9 Q So you agree that MCPET is a material
10 described to make a reflector in both paragraph 117
11 of Exhibit 1006 and also a material described in
12 column five of the '812 patent?

13 MR. MASSAND: Objection to form.

14 A Column five, line eight describes a
15 reflector sheet may be a natural microcellular
16 polyethylene terephthalate, MCPET, the same stuff
17 that's described in Starry. I answered.

18 BY MR. MORLOCK:

19 Q Okay. So you agree it's the same stuff
20 described in Starry, correct?

21 A I gave you my answer.

22 Q You agree that the MCPET described in
23 column five of the '812 patent is the same as the
24 MCPET described in paragraph 117 of Exhibit 1006,
25 correct?

1 MR. MASSAND: Objection to form.

2 A I do not agree with you. I am telling
3 you I can see that it's referred to in the '812 and
4 it's referred to in Starry, whichever exhibit that
5 is. That's as far as it goes. Both patents are
6 referring to it.

7 BY MR. MORLOCK:

8 Q So you don't agree that that is the same
9 material, MCPET, described in column five and
10 paragraph 117 of Starry?

11 MR. MASSAND: Objection to form.

12 A I don't have an opinion on that topic.
13 That's not in my declaration.

14 BY MR. MORLOCK:

15 Q Okay. Well, I'm just trying to make sure
16 we have a clear record. Okay.

17 A Good.

18 Q You don't have an opinion as to whether
19 the MCPET described in paragraph 117 of Exhibit 1006
20 is the same as the MCPET described in column five of
21 the '812 patent, correct?

22 MR. MASSAND: Objection to form.

23 A So you pointed me to it in the Starry
24 reference and I said I think it's referred to in the
25 '812 patent. And I showed you where it's referred to

1 in the '812 patent. So both patents refer to it.
2 That's as far as I'm willing to go. I don't have an
3 opinion on it otherwise. It's not in my declaration.
4 Maybe I'll look in my declaration and see if I talk
5 about MCPET or not.

6 BY MR. MORLOCK:

7 Q Let me -- I'm trying to make sure I just
8 get a clear record and I'm asking a simple yes or no.
9 You don't have an opinion as to whether or not the
10 MCPET described in paragraph 117 of Exhibit 1006 is
11 the same as the MCPET described in column five of the
12 '812 patent, correct?

13 MR. MASSAND: Objection to form.

14 A So in my declaration on page 23 there in
15 section C where it says Chou and Starry fail to teach
16 or disclose wherein the reflector sheet comprises a
17 polymer based porous material. Paragraph 69,
18 Starry teaches a "polymer preferably comprises
19 polyolefin." On the other hand the '812 patent
20 teaches that the reflector sheet 14 may be a
21 microcellular polyethylene terephthalate which
22 may have a typical thickness of approximately one
23 millimeter. So the '812 patent teaches that --
24 '812 patent, nonwoven film fibrils of polyolefin
25 have the consistency of a surgical mask.

1 BY MR. MORLOCK:

2 Q So you agree with me though that Exhibit
3 1006 describes a reflector may be using MCPET,
4 correct?

5 MR. MASSAND: Objection to form.

6 A I read to you the portion where it's got
7 that in there.

8 BY MR. MORLOCK:

9 Q Okay. So in addition to Starry teaching
10 a polymer preferable comprises polyolefin, it also
11 describes MCPET, correct?

12 MR. MASSAND: Objection to form.

13 A So paragraph 117 says what it says.
14 Table 8 reports the angular bandwidth as well as
15 commercial reflectors, PET reflectors by Toray
16 and MCPET from Furukawa.

17 So they're both in there. Paragraph
18 117 has it in there. My opinion says that it
19 teaches polymer preferably comprises polyolefin.
20 So that's the extent of my opinion on that.

21 BY MR. MORLOCK:

22 Q So you agree with me that MCPET is
23 referenced as a material from which a reflector can
24 be made in paragraph 117 of Exhibit 1006?

25 MR. MASSAND: Objection to form.

1 A So paragraph 117 talks about table 8.

2 THE COURT REPORTER: Talks about --

3 I'm sorry, I can't hear you.

4 THE WITNESS: Talks about table 8.

5 And table 8 it's got a list of parameters
6 and a list of reflector materials and MCPET
7 is one of them that was studied by the
8 inventors of Starry. The inventors of the
9 reference that I've been calling Starry. I
10 forget which exhibit it is.

11 BY MR. MORLOCK:

12 **Q You agree with me that MCPET is a -- is**
13 **more rigid than nonwoven film fibrils of polyolefin,**
14 **correct?**

15 A I don't have an opinion on that.

16 **Q You don't?**

17 A I've got what I've got here. In
18 paragraph 70 of my declaration where it says a more
19 rigid material is desirable and its reflective shape
20 can be maintained --

21 **Q What about the sentence immediately**
22 **preceding what you just read? What does that say?**
23 **Would you read that for me?**

24 A Starry teaches a polymer preferably
25 comprises polyolefin. On the other hand the '812

1 teaches reflector sheet 14 may be microcellular
2 polyethylene terephthalate which may have a typical
3 thickness of one millimeter according to the '812
4 patent.

5 Nonwoven film fibrils of polyolefin have
6 a consistency of a surgical mask commonly worn during
7 COVID 19 pandemic whereas MCPET sheet is more rigid.
8 And a more rigid material is desirable.

9 So yes, I said that in my declaration.

10 **Q So you agree that MCPET is more rigid**
11 **than nonwoven film fibrils of polyolefin?**

12 A So I wrote whereas an MCPET sheet is more
13 rigid at the bottom of paragraph 69. So that's
14 what's in paragraph 69 of my opinion.

15 **Q Are you familiar with the measurement**
16 **micrometer?**

17 A What?

18 **Q Are you familiar with the measurement**
19 **micrometer?**

20 A You mean -- you're talking about a
21 thickness of a micron?

22 **Q Correct.**

23 A Or a thousandth of an inch or what?

24 **Q I said a micrometer as in the distance**
25 **meter, and if you have a micrometer how large that**

1 is?

2 A So micrometer. Where are you reading
3 that from?

4 Q Well, I'm trying to understand how
5 large -- if we look at paragraph 75 of Exhibit 1006,
6 paragraph -- take a look at paragraph 75. It starts
7 nonwoven sheet diffuse reflectors?

8 A The thickness of 20 microns to about a
9 thousand microns.

10 Q Yes. How many millimeters is a thousand
11 microns?

12 A It's about one millimeter.

13 Q So a thousand microns is one millimeter,
14 correct?

15 A Something like that.

16 Q And how many millimeters is 20 microns?

17 A Probably about 0.002.

18 Q So you would agree with me then that
19 paragraph 75 of Exhibit 1006 describes nonwoven sheet
20 diffuse reflectors having a thickness from about
21 0.002 millimeters to about a millimeter, correct?

22 A I want to be sure. It says generally --
23 also in paragraph 75, generally less than about 250
24 microns, preferably from about 70 microns to 150
25 microns. Unwoven sheets have a thickness of about

1 250 --

2 THE COURT REPORTER: I can't hear you.

3 THE WITNESS: Useful and improved
4 properties such as flexibility -- desirable
5 for use in place of competitive materials
6 in applications requiring diffuse
7 reflection. So paragraph 75 is what it is.

8 BY MR. MORLOCK:

9 Q Okay. And paragraph 75 describes a range
10 of 20 microns to a thousand microns, correct?

11 A So I don't know how many times you want
12 to go over that.

13 Q I'm asking a yes or no question and I
14 haven't gotten an answer yet. And we'll go over it
15 until you answer the question.

16 A I thought I've answered it. It's
17 obviously asked and answered. It's in my -- my
18 declaration speaks for itself and --

19 Q I understand --

20 A -- the Starry patent speaks for itself.

21 Q Okay. I understand that the Starry
22 patent speaks for itself and I understand you've
23 offered a declaration. And your declaration
24 addresses Exhibit 1006 which you call the Starry
25 patent, correct?

1 A That is true.

2 Q So Exhibit 1006, paragraph 75, describes
3 nonwoven sheet diffuse reflectors of a thickness from
4 about 20 microns to about a thousand microns,
5 correct?

6 A We're going back and forth between these
7 things. So nonwoven sheet thickness of 20 microns to
8 a thousand microns generally less than 250 and
9 preferably from about 70 to 150. So I'm reading from
10 paragraph 75.

11 Q Okay. And you agree with me that 20
12 microns is 0.002 millimeter and 1,000 microns is one
13 millimeter, correct?

14 A I already answered that question.

15 Q Are you able to answer that question
16 again?

17 A I gave you my assessment of what those
18 numbers mean.

19 Q Okay. So are you able to give me that
20 assessment again?

21 A No.

22 MR. MASSAND: Object to form.

23 THE WITNESS: I've already done it.

24 BY MR. MORLOCK:

25 Q So you will not answer again for me the

1 question whether 0.002 microns -- sorry, 20 microns
2 is 0.002 millimeters and a thousand microns is one
3 millimeter?

4 MR. MASSAND: Objection to form.

5 A So if you read back the record you'll see
6 that I answered that question.

7 BY MR. MORLOCK:

8 Q And I'm asking you a yes or no and I
9 don't understand why you won't just say yes?

10 A Because I already answered it. You're
11 badgering me.

12 Q I'm not badgering you. I'm asking for an
13 answer to my question. I would appreciate an answer.

14 MR. MASSAND: Objection.

15 MR. MORLOCK: Mr. Massand, please, if
16 you have an objection you're welcome to
17 make it, but please don't otherwise inject
18 on the record. I'm asking a very simple
19 question of the witness. I believe --

20 MR. MASSAND: He's already answered.
21 Which he's already answered.

22 THE WITNESS: I've already answered
23 that question. I don't know why you keep
24 asking it over and over again. You're just
25 badgering me.

1 BY MR. MORLOCK:

2 Q Mr. Bohannon, I would appreciate it if
3 rather than accusing me of things I'm not doing you
4 would answer the question that I'm asking. It is --

5 MR. MASSAND: Why don't you read the
6 record back then?

7 MR. MORLOCK: Mr. Massand.

8 MR. MASSAND: He's already answered.
9 He's already asked and answered.

10 MR. MORLOCK: Mr. Massand, I will ask
11 again.

12 MR. MASSAND: Are you saying you're
13 not badgering him? You keep saying you're
14 not badgering him by repeatedly asking the
15 same question. Ask a new question.

16 MR. MORLOCK: Mr. Massand, please do
17 not inject with improper instructions to
18 the witness. You're providing improper
19 coaching.

20 MR. MASSAND: It is --

21 MR. MORLOCK: Mr. Massand, please
22 stop. I'm asking you to stop injecting on
23 the record. If you have an objection make
24 the objection in accordance with the rules
25 of the board. If Mr. Bohannon is able to

1 answer the question I ask that he answer
2 the question. I'm not asking an identical
3 question.

4 THE WITNESS: I already answered that
5 question. You keep asking it over and over
6 again. Therefore you are badgering me.

7 BY MR. MORLOCK:

8 Q Mr. Bohannon, I'm not badgering you. I'm
9 simply asking you questions that has a yes or no and
10 asking for a yes or no answer. Are you able to --

11 A I've already answered the question.

12 Q You have not answered the question I have
13 asked.

14 A Yes, I have.

15 Q Are you refusing to answer it? Mr.
16 Bohannon are you refusing to answer the question?

17 A I already answered it. It's on the
18 record.

19 MR. MASSAND: Objection to form.

20 THE WITNESS: You can read it.

21 BY MR. MORLOCK:

22 Q I'm asking a different question. Will
23 you answer the question I'm asking?

24 MR. MASSAND: Objection to form.

25 A I've already answered it.

1 BY MR. MORLOCK:

2 Q Okay. I'm going to ask a different
3 question. Paragraph 75 describes nonwoven sheet
4 diffuse deflectors [sic] comprising a thickness of
5 between 0.002 millimeters to about one millimeter,
6 correct?

7 A It says what it says. I've read it and
8 I've analyzed it for you before.

9 Q Are you refusing to answer the question I
10 just asked, Mr. Bohannon?

11 MR. MASSAND: Objection to form.

12 A You're just -- you just read a thing and
13 then say correct at the end. I mean you're badgering
14 me. I've already answered this question. You've got
15 what you've got on the answer.

16 BY MR. MORLOCK:

17 Q So if we turn you to paragraph 71 of your
18 declaration?

19 A So yes, I'm looking at it.

20 Q The statement, the preferred embodiment
21 of the reflector sheet -- well, you said the
22 preferred embodiment of the reflector sheet
23 envisioned in the '812 patent. What is that
24 preferred embodiment?

25 A I have to go back and look at the patents

1 to see.

2 Q Paragraph 71 says Starry discloses a
3 reflector sheet. I mean what is the -- you're
4 welcome to look at the '812 patent I suppose and tell
5 me what you believe that preferred embodiment of the
6 reflector sheet envisioned by the '812 patents is?

7 A I don't have the '812 memorized. I have
8 to read the preferred embodiment and decide what --

9 Q You have '812. We've introduced the '812
10 patent as Exhibit 1001 which I believe you have on
11 your desktop. You're welcome to take a look.

12 A That's what I'm trying to do, but you
13 keep interrupting me.

14 Q I apologize. I didn't know what you were
15 looking at. Please let me know when you're ready to
16 answer a question.

17 A I'm looking for the preferred embodiment.
18 I am not finding the spot on the -- in the '812 that
19 talks about preferred embodiment. I'm wasting time.
20 I'm not finding preferred. I see it in the
21 declaration, but I'm not finding an example of
22 preferred embodiment, so I can't find it off the top
23 of my head here. Just wasting time.

24 Q I'm sorry, I thought you were looking at
25 the declaration?

1 A I am. I'm not finding --

2 Q I'm offering you the opportunity to look
3 it up you said you needed to look up.

4 A I'm trying to do that and I just told you
5 I'm not finding the preferred embodiment in the --

6 Q You're not able to tell me what you mean
7 by the preferred embodiment of the reflector sheet
8 envisioned in the '812 patent as you say in paragraph
9 71 of your declaration?

10 A So far I haven't been able to find it.

11 Q Okay. Well, I'm -- do you want to
12 continue looking?

13 A But I'm not -- it says some embodiment --
14 in some embodiments the reflector sheet is such and
15 such.

16 Q Well, let me ask it a different way then.
17 Are you -- do you want to continue looking in the
18 '812 patent or are you done with that?

19 A As I said before I think I'm wasting time
20 trying to find that reference.

21 Q Are you unable to find it, Mr. Bohannon?

22 A I have some embodiments. There's like 49
23 instances of embodiments. And I'm skipping through
24 49 instances of the word "embodiment" in the '812
25 patent. So some embodiments. Typical embodiments.

1 Some embodiments. Other embodiments, those are
2 embodiments. So I have some and further and other.
3 Some embodiments. Particular embodiments.

4 So I don't find the word "preferred
5 embodiment." So maybe it's a typo. I've got some
6 embodiments, further embodiments, other embodiments,
7 etcetera. So preferred embodiments, they were
8 talking about -- sorry, preferred embodiments, I
9 don't know. I can't answer your question there which
10 preferred embodiment it's talking about because there
11 is no preferred embodiment. I can't find the words
12 "preferred embodiment" in the '812 patent.

13 Q Let me ask this. Now that you reviewed
14 the '812 patent let me ask a different question. If
15 you turn to claim four of the '812 patent, that's
16 page ten?

17 A The tile of claim one where the reflector
18 sheet encompasses the thickness of less than
19 approximately one millimeter.

20 Q We just established from your prior
21 testimony that paragraph 75 of Starry describes a
22 reflector sheet with a thickness from about 20
23 microns to about a thousand microns, correct?

24 A We supposedly did that.

25 Q And 20 microns to a thousand microns

1 includes multiple thicknesses that are less than
2 approximately one millimeter, correct?

3 A So the style of claim wherein the
4 reflector sheet comprises a thickness of less than
5 approximately one millimeter. So that's the way the
6 claim reads.

7 Q And paragraph 75 of Exhibit 1006
8 describes diffuse reflectors with a thickness from
9 about 20 microns to about a thousand microns. And
10 that includes ranges that are less than approximately
11 one millimeter, correct?

12 A We already answered that or I already
13 answered that.

14 Q So are you refusing to answer that
15 question, Mr. Bohannon?

16 A Or you just want to put a correct on top
17 of stuff I've already answered. So I don't know why.
18 You've already got your point made.

19 Q Mr. Bohannon, do you agree with me that
20 the thickness recited by claim four is shown by
21 paragraph 75 of Exhibit 1006?

22 MR. MASSAND: Objection to form.

23 A I read paragraph 75 to you and went over
24 what it means to you.

25 BY MR. MORLOCK:

1 Q So claim four recites a reflector sheet
2 comprises a thickness of less than approximately one
3 millimeter and paragraph 75 describes a nonwoven
4 sheet of a thickness from about 20 millimeters to
5 about a thousand micrometers. That's the same --
6 that includes the range claimed in claim four,
7 correct?

8 MR. MASSAND: Objection to form.

9 A So we already discussed that. I read the
10 claim. I read paragraph 75. You got what you got.
11 BY MR. MORLOCK:

12 Q Well, so you're refusing to answer that
13 question, correct?

14 MR. MASSAND: Objection.

15 A I already answered that question.
16 BY MR. MORLOCK:

17 Q And Mr. Bohannon, with respect to claim
18 five, you state when a reflector sheet has a
19 thickness of less than approximately 50
20 millimeters -- 20 microns is less than 50
21 millimeters, correct?

22 A So that's not 50 millimeters. That's
23 0.50 millimeters.

24 Q Thank you. I appreciate that correction.
25 I appreciate that. I did say 50, didn't I? Let me

1 try that question again.

2 Claim five recites a thickness of less
3 than approximately 0.5 millimeters, correct?

4 A So claim five reads: The tile of claim
5 one, wherein the reflector sheet has a
6 thickness of less than approximately 0.5 millimeters.

7 Q And --

8 A So that's what claim five says.

9 Q 20 microns is less than 0.5 millimeters,
10 correct?

11 A Well, you've got your answer. I read
12 paragraph 75 to you. I've analyzed it right at the
13 beginning, so you've got what you've got out of that.

14 Q So I'm asking you specifically with
15 respect to claim five, paragraph 75 of Exhibit 1006
16 describes the -- a range of thicknesses of 20 microns
17 up to a thousand microns and that includes ranges of
18 less than 0.5 millimeters, correct?

19 MR. MASSAND: Objection to form.

20 A Well, 20 microns is 20 microns. I mean
21 I'll let you do the math.

22 BY MR. MORLOCK:

23 Q Okay. Is -- claim six recites wherein
24 the reflector sheet has a thickness of less than
25 approximately 0.25 millimeters, correct?

1 A 0.25 mill -- tile of claim 1, wherein the
2 reflector sheet has a thickness of less than
3 approximately 0.25 millimeters.

4 Q 20 microns is less than 0.25 millimeters,
5 correct?

6 A I'll let you do the math. I've already
7 read 75 to you.

8 Q Are you -- do have you an opinion as to
9 whether 20 microns is less than 0.25 millimeters?

10 A That's not in my declaration. I don't
11 have an opinion written like that.

12 Q So as you sit here today, do you have an
13 opinion as to whether or not 20 microns is less than
14 0.25 millimeters?

15 MR. MASSAND: Objection to form.

16 A You got what you want. I read paragraph
17 75 to you.

18 BY MR. MORLOCK:

19 Q Did you review 75 -- paragraph 75 of
20 Exhibit 1006 when you prepared your declaration for
21 this --

22 A I did.

23 Q -- proceeding. Okay. And what did you
24 conclude from paragraph 75 of Exhibit 1006 when you
25 prepared your declaration for this proceeding?

1 MR. MASSAND: Objection.

2 A By paragraph 71, preferable thickness as
3 a function of Starry -- preferable thickness of
4 between 0.25 and 0.15 millimeters preferably --
5 probably a function of Starry's optical cavity
6 design. And I say although the range of 0.15 to 0.25
7 is within the range of zero to one, it is exclusive
8 of a significant portion of the latter range so that
9 the preferred embodiment of the reflector sheet
10 envisioned in the '812 patent falls outside the range
11 described by Starry. That's my --

12 BY MR. MORLOCK:

13 Q You were unable to identify -- sorry, are
14 you done? I didn't mean to talk over you.

15 A I wasn't done. I said that's my opinion
16 and I'm not changing it.

17 Q But as you sat here today during your
18 deposition you were unable to identify for me what
19 the preferred embodiment was of the '812 patent,
20 correct?

21 MR. MASSAND: Objection to form.

22 A What I said to you was I could not find
23 the words "preferred embodiment." There was various
24 embodiments in there. I can go back and find one
25 which talks about embodiment or the thickness. But I

1 didn't want to the waste everyone's time. It's
2 probably in there somewhere. I'm sure it's in there
3 somewhere. I wouldn't have written this if it wasn't
4 in there. I just can't find it under the pressure of
5 being badgered constantly.

6 BY MR. MORLOCK:

7 Q I'm sorry. Mr. Bohannon, I'm asking
8 simple questions here. You don't need to make wild
9 accusations. I'm not yelling at you. I'm simply
10 asking very simple questions from your declaration
11 and the prior art that you analyzed in preparing your
12 declaration.

13 A Well, you've asked the same question over
14 and over and over and over which I call badgering.

15 Q Attempting to receive an answer and I'm
16 not getting it, so I keep asking that question. But
17 why don't we move on to a different prior reference
18 here.

19 I just dropped in the screen share what
20 was previously marked in connection with the petition
21 as Exhibit 1002 -- I'm sorry, 1007. I apologize. I
22 gave you the wrong number.

23 A Which prior art is that? That was a --

24 Q Let me know when you have Exhibit 1007
25 open.

1 A I have it open.

2 Q Okay. Do you see a -- well, let me know
3 when you've looked at -- have it open and you're
4 ready to review and talk about it.

5 A I'm waiting for a question.

6 Q Okay. Could you turn to Fig. 4. It is
7 on page five.

8 A Fig. 4 you say?

9 Q I do.

10 A I'm waiting for a question.

11 Q Okay. You see at the top of the figure
12 there is an element 26 that comprises two elements,
13 30 and 29?

14 A I see.

15 Q I'm sorry, I didn't get an answer.

16 MR. MASSAND: He said I see.

17 MR. MORLOCK: Okay. Is the element 26
18 shown in figure four of Exhibit 1007 flat?

19 A Hard to tell. I'm reading on page eight,
20 paragraph 74 where each reflective sheet 27 is formed
21 by an insulating expandable PET, while the reflecting
22 plate 26 is formed, the plate 29 of aluminum and the
23 laminate of expandable PET films 30 as described
24 above.

25 I need go back to the figure. Hard to

1 say what 26 is. I mean that whole thing, it looks
2 like a laminate. The whole thing is referred to as
3 six, you know, the whole element is a six and it
4 looks likes 30 is the top surface and 29 may be the
5 bottom surface or the middle. I can't tell.

6 BY MR. MORLOCK:

7 Q So you can't tell from figure four
8 whether or not the element 26 is substantially flat?

9 A Trying to see what 26 is. Is it the
10 laminate? If that's the whole thing referred to as
11 the six, it looks like 30 is perhaps the top and 29
12 may be the bottom surface or the middle section of
13 it. I can't tell.

14 Q You can't --

15 A I can't tell. You know, it may or may
16 not be. Hard to tell as you describe it as flat.

17 Q So you're unable to tell from Fig. 4
18 whether element 26 is flat, correct?

19 A It may or it may not be. Can't really
20 take these drawings at face value.

21 Q So you can't take the drawings of the
22 patent at face value?

23 A It could be slightly bent. It could
24 be -- you know, it's been drawn in perspective. It's
25 hard to say.

1 **Q** So your testimony is you can't take
2 patent figures at face value for what they show?

3 A Well, there's --

4 MR. MASSAND: Object to form.

5 THE WITNESS: There's kind of an
6 artifice involved in making the drawings
7 and it's hard to say if they're supposed to
8 be flat. That's why, you know, I look at
9 the drawings in conjunction with the
10 description. So what does the description
11 say?

12 BY MR. MORLOCK:

13 **Q** You have the figure in front of you.
14 You're unable to tell from the figure -- you can look
15 at the description if you want -- whether or not
16 element 26 is --

17 MR. MASSAND: Objection --

18 THE COURT REPORTER: I'm sorry, your
19 objection came over the end of the
20 question.

21 MR. MORLOCK: You can't tell from
22 figure four and the written description of
23 Exhibit 1007 whether element 26 is flat?

24 MR. MASSAND: Objection.

25 A I'm looking at the description for figure

1 six or section six. And so far I haven't been able
2 to find a good distribution of that piece. So I
3 stand by my answer whether I can tell precisely if
4 it's flat or not flat. And I may be flat or it may
5 not be flat.

6 BY MR. MORLOCK:

7 Q And you can't tell precisely whether or
8 not element 26 in Fig. 4 is flat, correct?

9 MR. MASSAND: Objection to form.

10 A I said that about three times now.

11 BY MR. MORLOCK:

12 Q Thank you. I'm just trying to make a
13 clear record. I appreciate you answering the
14 question.

15 If you would look at -- on Fig. 4 there
16 are -- you see there are -- is an element 32, it
17 appears to be a hole, an elongated hole in element
18 26. You see that?

19 A I do.

20 Q There are some dashed lines going down
21 from that hole that's labeled as 32. Do you see
22 those lines?

23 A I do.

24 Q What do those lines tell you when you
25 review Fig. 4?

1 A Oh, it appears that that's where the LED
2 or the light emitting elements gets through.

3 Q Would you agree that the LEDs that are
4 shown here in this figure are smaller than that hole
5 32?

6 A No. I don't know if they're -- how do
7 they describe it, LEDs or spotlights? I thought that
8 Tabito's got some kind of different terminology.

9 Q Well, so if you look at paragraph 74
10 which you were just describing, element 18 is
11 described as LED?

12 A What page is that on?

13 Q Paragraph 74 is on page 15.

14 A Thank you.

15 MR. MASSAND: Can we do a break in
16 about ten minutes or so, whenever you're
17 done with this line?

18 MR. MORLOCK: I'd like to get through
19 the question I was asking. But yes, if you
20 want a break that would be fine.

21 MR. MASSAND: I didn't mean right now.

22 MR. MORLOCK: Sure.

23 A So yeah, he's calling number 18 an LED.

24 BY MR. MORLOCK:

25 Q So do you see back on Fig. 4, you see the

1 LED 18?

2 A Yeah, I see the element 18. There's
3 element 18C, 18A, 18B, different parts of element 18.

4 Q There's another 18A. Do you see that?

5 A There's another 18A.

**6 Q And so as your understanding of Fig. 4
7 that the hole 32 passes over top of those LEDs 18?**

8 A Well, it appears to at some point. It's
9 hard to see what the height of those things are and
10 it would be good to see them assembled to see how
11 far -- if they pass over the top or not. And they
12 just stick through. I can't tell.

**13 Q You can't tell if the LEDs stick through
14 the hole 32 in Fig. 4?**

15 A Well, if you look at Fig. 2, so if you
16 can look at Fig. 2 you see the LED 18 is displayed
17 above it. So this is called out 23. So you see what
18 I'm talking about on Fig. 2, the LEDs do not actually
19 pass through that plate. I guess just the light
20 does.

**21 Q So Fig. 2 you don't think the LED passes
22 through the plate?**

23 A So it looks like they don't pass through
24 23. I guess they pass through 26.

25 Q You agree the LED 18 shown in Fig. 2

1 passes through the reflector plate 26?

2 A It appears it goes through 26 but not 23.
3 And it's hard to tell that -- you know, you've got a
4 six pointing to it up there. He hasn't been
5 consistent as you call out.

6 MR. MORLOCK: Well, I think Mr.

7 Massand asked for a break. I'm happy to
8 take a break. You want to take ten minutes
9 till 6:00 p.m. Eastern, 5:00 your time, Mr.
10 Massand?

11 MR. MASSAND: That's fine.

12 THE WITNESS: I'm fine with that.

13 (Whereupon, a brief recess was taken.)

14 BY MR. MORLOCK:

15 **Q Welcome back, Mr. Bohannon.**

16 A Thank you.

17 **Q Did you speak to anybody during the**
18 **break, Mr. Bohannon?**

19 A No. My wife came over. I talked to her.

20 **Q I'm assuming you did not discuss the**
21 **substance of your deposition with your wife?**

22 A I did not.

23 **Q Did you review any documents during your**
24 **break?**

25 A I did not.

1 **Q** Thank you. You still have Exhibit 2006
2 in front of you, correct?

3 **A** I did not close it.

4 **Q** Great. So paragraph 25 and 26 give a
5 technology overview of the '812 patent. Do you see
6 that?

7 **A** You're talking about the Tabito
8 reference?

9 **Q** I'm talking about your declaration,
10 Exhibit 2006.

11 **A** Oh, my declaration. I thought because
12 the -- the Tabito reference is Exhibit 1006. I guess
13 I was confused. All right. Which paragraph?

14 (Whereupon, Exhibit No. 1007 was marked
15 for identification by the court reporter.)

16 BY MR. MORLOCK:

17 **Q** Exhibit -- paragraphs 25 and 26.

18 **A** So the '812 patent overview, that section
19 four?

20 **Q** I'm looking at section three, paragraphs
21 25 and 26.

22 **A** Technology overview.

23 **Q** Yes.

24 **A** The relevant field for the '812 patent is
25 that of solid state lighting system.

1 Q Yeah, paragraph 26 describes diffusion
2 plane -- it says, a first diffusion plane, a first
3 distance from the solid state light emitters and a
4 second diffusion plane that is a second distance.
5 What is that in reference to?

6 A Well, I think that's just a reference in
7 general. This says technology overview, the relevant
8 field for that of the '812 patent is of solid state
9 lighting systems. So that's at the '812 patent,
10 tells you which chart. Then section four, paragraph
11 27, so it's technology overview, not an '812
12 overview. But the first part of starting in
13 paragraph 25 the relevant field for that of the '812
14 patent, etcetera.

15 THE COURT REPORTER: I'm sorry, can
16 you speak up, please?

17 A Yeah. Paragraph 25 starts out the
18 relevant field for that of the '812 patent is that of
19 solid state lighting systems, more particularly to
20 solid state lighting tiles and/or panels. And then
21 it goes on to the next page in paragraph 26, the '812
22 patent overview starts in paragraph 27.

23 BY MR. MORLOCK:

24 Q Okay. If we go to paragraph 30 of your
25 declaration?

1 A Additionally the '812 patent describes a
2 variety of protruding features over which the
3 reflector may be configured to conform. These
4 include wire interconnects and other features on the
5 tiles.

6 THE COURT REPORTER: I can't hear.

7 THE WITNESS: These include wire
8 interconnects and other features on the
9 tiles.

10 (Whereupon, a discussion ensued off the
11 record.)

12 BY MR. MORLOCK:

13 **Q The middle sentence of paragraph 30 says:**
14 **These include wire interconnects and other features**
15 **on the tiles.**

16 **What are -- in addition to wire**
17 **interconnects what are some other features on the**
18 **tiles?**

19 A So reading that sentence it makes a quote
20 from the patent where it says substrate 13A and 13B
21 can also include surface protrusions such, for
22 example, a large wire interconnect and then it points
23 to column four, lines 62 to 64. And then it goes on
24 to say the large wire interconnect 18 is but one
25 example of a surface protrusion that can occur on the

1 surface of the substrate. Points to column five,
2 line 48 to 50.

3 Q So you say wire interconnect and other
4 features on tiles. What are some examples of other
5 features on the tiles?

6 A I think the patent describes them. Let
7 me got to it and -- column four and five, we've gone
8 over and over that quite a bit. So if you look at
9 the bottom of column four from line 65-ish -- back up
10 a little bit.

11 So I'll read from line 63 says:
12 Substrates 13A and B can also include surface
13 protrusions such as, for example, large wire
14 interconnect, LWI in parentheses 18, LWI 18 can be
15 used to provide electrical connections for tiles.
16 12A and 12B adjacent to large wire, the LWI 18 could
17 be an optional insulating plug that can mechanically
18 join and electrically insulate adjacent tiles 12A and
19 B.

20 And then at the bottom of column five,
21 and the large wire interconnect may be electrically
22 insulated or protected from environmental exposure
23 with a passivation or encapsulation material
24 including, for example, silicone.

25 So that's examples.

1 **Q** So did you agree the '812 patent
2 describes that the solid state lighting panel can
3 include solid state lighting bars?

4 A Where are you reading that?

5 **Q** I'm reading from '812 patent.

6 A Which line and column, please?

7 **Q** I'm looking at column four.

8 A Which line.

9 **Q** Column four, line 45.

10 A A solid state lighting device may
11 include, for example, a packaged light emitting
12 device including one or more light emitting diodes.
13 And then the solid state lighting bar 30 as
14 illustrated in Fig. 3. Oh, yeah Fig. 3, so the whole
15 thing is 30. So there you go.

16 **Q** Okay. So you previously testified when
17 you read column four how that column describes
18 electrical interconnections for tiles, correct?

19 MR. MASSAND: Object to form.

20 A Yes, the substrate includes surface
21 protrusion such as for example a large wire
22 interconnect, LWI, using --

23 BY MR. MORLOCK:

24 **Q** The next one says: LWI can be used to
25 provide electrical interconnections for tiles.

1 And then next to that it says: **Adjacent**
2 to the LWI can be an optional insulating plug.

3 A That's what I --

4 **Q See that?**

5 A -- (inaudible) previously.

6 THE COURT REPORTER: I'm sorry, the
7 answer?

8 THE WITNESS: I said I had read that
9 previously.

10 BY MR. MORLOCK:

11 **Q Okay. What is an insulating plug?**

12 A So it says insulating plug 16. See the
13 number that comes after plug? And then if you go
14 back and look at -- in the -- you can see insulating
15 plug -- oh, no, that's in Fig. 4. In Fig. 3 as well.
16 Fig. 3 and 4 both show insulating plug 16.

17 **Q What is an insulating plug?**

18 A The patent tells us what that is.

19 **Q And what is insulating plug?**

20 A So let's -- we read that before in column
21 four. Let me get there again. Adjacent to the LWI
22 18 can be an optional insulating plug 16 that can
23 mechanically join and electrically insulate adjacent
24 tiles 12A and 12B. So there's your answer.

25 **Q So what is it -- can you -- in your**

1 **experience taking apart these devices, have you taken**
2 **apart a devices with the design shown in Fig. 3 of**
3 **the '812 patent?**

4 A Let me go back to Fig. 3 and see.
5 Generally speaking so I have stripped off the
6 reflective cover -- the reflective sheets 24 I
7 stripped off. I pulled LEDs out. I have not split
8 substrates apart. So the upper layers of that type
9 of thing.

10 **Q What is the large wire interconnect made**
11 **of in the devices you have taken apart?**

12 MR. MASSAND: Objection to form.

13 A It depends.

14 BY MR. MORLOCK:

15 **Q What are some examples?**

16 A Anything that would make a good
17 electrical conductor. I mean it's any variety of
18 things in there.

19 **Q Well, what would be an example of an**
20 **insulating plug?**

21 A I don't want to limit the claims.
22 Electrically, mechanically, so to provide electrical
23 connection. So there's many different things that
24 request provide electrical connection. So I don't
25 want to speculate about that. I have not speculated

1 so far. My declaration speaks for itself. I do not
2 identify beyond electrical interconnections.

3 Q So what is -- you don't know what an
4 insulating plug is?

5 MR. MASSAND: Objection to form.

6 A You weren't asking me about insulating
7 plugs. You were asking me about wiring.

8 BY MR. MORLOCK:

9 Q I'm asking you about insulating plug 15
10 within Fig. 3? What is an insulating plug?

11 A Well, it's something that can
12 mechanically join and electrically isolate. So it
13 could be a variety of different materials.

14 Q And when you have disassembled the
15 device, what is an insulating plug made out of?

16 A I haven't disassembled -- I haven't
17 separated substrates like you would see in Fig. 3.
18 So I peeled off the top layers but I haven't split it
19 part to see or analyze what was on there. But it's
20 clear from the patent it's something that
21 electrically insulates. It could be a variety of
22 things.

23 Q Let's go back to paragraph 31 of your
24 declaration.

25 A Yep.

1 **Q Paragraph 31 you identify a list of**
2 **factors at issue to determine the level of ordinary**
3 **skill in the art, correct?**

4 A Understanding the factors, certain level
5 of education and experience of persons working in the
6 field, the types of problems encountered and the
7 sophistication of the technology.

8 Yes, what's your question?

9 **Q Did you speak to anybody to determine the**
10 **level of education and experience of people working**
11 **in the field in March of 2007?**

12 MR. MASSAND: I'm going to instruct
13 the witness not to answer to the extent it
14 would reveal conversations between him and
15 counsel, but to the extent he can answer
16 without doing that, go ahead.

17 A What precisely do you mean?

18 BY MR. MORLOCK:

19 **Q Well, you say here that you understand**
20 **that one of the factors in determining level of**
21 **ordinary skill in the art is the level of education**
22 **and experience of persons working in the field in**
23 **March 16th, 2007, right?**

24 A Yes, that's an accurate assessment of
25 that thinking.

1 **Q** Did you speak to anybody to determine
2 what the level of education and experience of people
3 working in the field in March 16th, 2007 was? I'm
4 not asking you for attorney/client communication.
5 I'm asking you if you spoke to any people who work in
6 this field or worked in this field?

7 MR. MASSAND: Just for the record,
8 same objection, same instruction.

9 A So on my own personal experience I have
10 worked with many people around the world in Asia and
11 in America on display technology. And they have
12 commensurate with their level of education, etcetera.
13 BY MR. MORLOCK:

14 **Q** What is that -- what is the level of
15 education and experience of people working in the
16 field as of March 16th, 2007?

17 A So bachelor's degree. And there's all
18 kinds of people working in the technology. It's not
19 very complex technology. It doesn't require a lot of
20 education, just some education, just basic college.

21 **Q** What are the types of problems
22 encountered in this field in March 16th, 2007?

23 MR. MASSAND: Objection to form.

24 A So basically from speaking to a lot of
25 people around the world, the main problem is to make

1 them cheaper, try and make a cheaper, better TV.

2 That's the goal.

3 BY MR. MORLOCK:

4 **Q When you say -- when you say better TV,**
5 **what is a better TV?**

6 A Well, people when they first -- so I was
7 there when the first high definition television set
8 was revealed in Japan. 40-inch TV cost a million
9 bucks at that point in time. And the goal was to get
10 it down like a hundred dollars an inch, diagonal
11 inch, so your 40-inch TV would then cost \$4,000. Now
12 when you go down to Best Buy, you can buy a 40-inch
13 TV for probably 2- or \$300.

14 So the market has gone dramatically from
15 the first million-dollar TV down to a \$200 TV. So
16 it's always been the biggest problem in technology is
17 trying to get them cheaper and better and bigger.
18 And now you buy a 60-inch TV for probably less than a
19 thousand dollars. And pretty soon it will be 2- or
20 300. It's hard to imagine.

21 **Q Is one of the -- one of the problems**
22 **encountered in the field to make TV sets thinner?**

23 A Of course but they've pretty much reached
24 that point. They're as thin as they're going to get.

25 **Q But one of the motivations in the field**

1 is to make TVs thinner, correct?

2 A Nobody wants thick TVs. I mean there's a
3 point when -- nobody really knows. There's such a
4 tremendous difference between the old CRT based TV
5 versus the flat TV now. It's astounding regardless
6 of what level they're talking about.

7 Q How would you characterize the
8 sophistication of backlight technology of March 16th,
9 2007?

10 MR. MASSAND: Objection to form.

11 A That's a very hard question to answer.
12 How would I judge sophistication. You know, it's
13 increment by increment. People of this passion just
14 work on making them thinner and better and cheaper.
15 BY MR. MORLOCK:

16 Q Your declaration says that one of the
17 factors you considered was the sophistication of the
18 technology at the time of the purported invention.
19 And I'm trying to understand what you considered to
20 be the sophistication of the technology at the time
21 of the purported invention?

22 A Well, for example, you can see right here
23 on Fig. 3 the LEDs are big. So today in 2024 the
24 LEDs are a lot smaller. They have micro LEDs. So
25 they have smaller LEDs and more of them. So

1 that's --

2 Q At the time of the invention LEDs were
3 tall?

4 A Relatively bigger.

5 Q Relatively -- took up more surface area?

6 A Just bigger. And everything's been
7 shrunk, want to make it thinner and smaller and
8 better and more resolution and brighter and more
9 contrast and all that sort of stuff. So people are
10 just polishing away on this, making it smaller and
11 better and bigger and cheaper, trying to make a
12 profit in that which is why so many companies are
13 leaving the field now because it's not that
14 profitable.

15 Q Have you ever met Morgan Patterson in the
16 field?

17 A No.

18 MR. MORLOCK: All right. For the time
19 being I'm going to pass the witness to you,
20 Mr. Massand.

21 MR. MASSAND: We have no questions at
22 this time.

23 MR. MORLOCK: Okay. We can go off the
24 record then, Ms. Fulwood.

25 MR. MASSAND: I'll take a copy to read

1 and sign only.

2 - - -

3 (Deposition concluded at 6:25 p.m.)

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1 E R R A T A S H E E T

2
3 Pursuant to Rule 30(7)(e) of the Federal
4 Rules of Civil Procedure and/or Georgia Code
5 Annotated 81A-130(B)(6)(e), any changes in form
6 or substance which you desire to make to your
7 deposition testimony shall be entered upon the
8 deposition with a statement of the reasons given
9 for making them.

10 To assist you in making any such corrections,
11 please use the form below. If supplemental or
12 additional pages are necessary, please furnish
13 same and attach them to this errata sheet.

14 - - -

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16 hereby certify that I have read the foregoing
17 deposition and that to the best of my knowledge
18 said deposition is true and accurate (with the
19 exception of the following corrections listed
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Page 122

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11 Sworn to and Subscribed before me
12 _____, Notary Public.
13 This_____day of _____, 2024.
14 My Commission Expires:
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4

5 I hereby certify that the foregoing
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15 anywise interested in the result of said case.

16 This 12th day of September 2024.

17

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19

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