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Transcript of Vijay K. Madisetti, Ph.D.

Date: September 24, 2024

Case: T-Mobile USA, Inc. -v- General Access Solutions, Ltd. (PTAB)

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1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3 - - - - - x
4 NOKIA OF AMERICA :
5 CORPORATION, ERICSSON :
6 INC., AND T-MOBILE :
7 USA, INC., : Case No. IPR2023-01416
8 Petitioners, : U.S. Patent No.
9 v. : 6,947,477
10 GENERAL ACCESS :
11 SOLUTIONS, LTD., :
12 Patent Owner. :
13 - - - - - X
14
15 Deposition of VIJAY K. MADISETTI, Ph.D.
16 Conducted Virtually
17 Tuesday, September 24, 2024
18 9:03 a.m. EDT
19
20 Job No.: 553103
21 Pages 1 - 44
22 Reported by: Debra A. Whitehead

1 Deposition of VIJAY K. MADISETTI, Ph.D.,
2 conducted virtually.

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5 Pursuant to notice, before Debra Ann Whitehead,
6 E-Notary Public in and for the Commonwealth of
7 Virginia.

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1 A P P E A R A N C E S

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C O N T E N T S

EXAMINATION OF VIJAY K. MADISETTI, Ph.D.	PAGE
By Mr. Davison	5

EXHIBITS MARKED IN TODAY'S SESSION
(None Marked)

EXHIBITS MARKED IN PRIOR SESSIONS
(Not attached)

DEPOSITION EXHIBIT	PAGE
Exhibit 1001 U.S. Patent No. 6,947,477	9
Exhibit 1002 File History for U.S. Patent No. 6,947,477	32
Exhibit 1007 U.S. Patent No. 5,909,470	37
Exhibit 2003 Declaration of Vijay K. Madiseti, Ph.D.	23

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

2 VIJAY K. MADISETTI, Ph.D.,

3 having been duly sworn, testified as follows:

4 EXAMINATION BY COUNSEL FOR PETITIONERS

5 BY MR. DAVISON:

6 Q Sir, will you please state your full
7 name, for the record.

8 A Vijay K. Madiseti.

9 Q And where are you physically located
10 today?

11 A I am located in my office at Georgia
12 Tech.

13 Q So the Atlanta, Georgia, area?

14 A That's right.

15 Q Is there anyone in the room with you?

16 A Nobody.

17 Q Other than the Zoom application on your
18 computer, do you have any other applications
19 other?

20 A I had my e-mail, but nothing else.

21 Q Do you have a copy of the declaration you
22 submitted in this IPR proceeding available to you?

1 Let me rephrase. Did you bring any paper
2 copies of the documents we're going to talk about
3 today?

4 A No, I did not.

5 Q Now, sir, if I understand correctly,
6 you've testified in numerous depositions before.

7 Is that fair?

8 A Yes.

9 Q I'm going to go over the ground rules
10 anyway. You probably heard these a million times.

11 You understand you're testifying under
12 oath?

13 A Yes.

14 Q And please be sure to give verbal answers
15 to my questions.

16 Is that okay?

17 A Yes.

18 Q And if you don't understand one of my
19 questions, will you ask me to rephrase it?

20 A I will.

21 Q Is there any reason why you'd have
22 difficulty testifying here today?

1 A No.

2 Q I do not expect this is going to be a
3 very long deposition. We've got pretty few
4 materials. But if you need a break or if anybody
5 needs a break, please let me know.

6 A Sounds good.

7 Q All right. Now, Doctor, approximately
8 when did you first read the '477 patent?

9 A I don't remember the exact date.

10 Q Was it this year or last year?

11 A I don't remember. It could have been
12 last year, but it could have been earlier. I
13 mean, I don't remember, Counsel.

14 Q About how much time have you spent
15 working on this IPR?

16 A About 50 hours, 50 hours.

17 Q Can you describe for me just generally
18 how you went about preparing the declaration you
19 submitted in this proceeding?

20 A I was asked to opine on certain claims.
21 And I reviewed the patent, the institution
22 decision, and the -- some of the exhibits. And

1 then I discussed with the counsel my opinions and
2 arguments and support for the same.

3 Q Who prepared the initial draft of your
4 expert declaration?

5 A I did.

6 Q Now, you said you were asked to opine on
7 certain claims in the '477 patent. Am I correct
8 that you did not opine on all of the claims in the
9 '477 patent in these proceedings?

10 A Yes. I was asked to opine on certain set
11 of claims, which are Claims 1 through 15 and Claim
12 18.

13 Q So fair to say you're not offering an
14 opinion in this proceeding on Claims 16, 17, 19,
15 or 20. Right?

16 A Yes, that's right.

17 Q In preparing the opinions that you've
18 offered in this proceeding did you speak with
19 anyone else beyond the -- your attorneys?

20 A I did -- I didn't.

21 Q So you have not spoken to the inventors
22 as it relates to your opinions in this proceeding.

1 Right?

2 A I did not.

3 Q Doctor, what did you do to prepare for
4 today's deposition?

5 A I briefly reviewed my declaration and the
6 institution decision briefly and had a short
7 conversation with the counsel.

8 Q And by "counsel" do you mean Ms. Spires,
9 who is here in this deposition with us?

10 A Yes.

11 Q And about when did you meet with her to
12 prepare for this deposition?

13 A Yesterday I had a short call.

14 Q Was anyone else present?

15 A No.

16 Q So I have dropped into the chat, Doctor,
17 what has been marked as Exhibit 1001.

18 (Exhibit 1001, previously marked, not
19 attached.)

20 Q Can you let me know when you have that
21 available.

22 A Okay, I'm downloading it. Let me save it

1 somewhere.

2 Okay, I have downloaded it. And should I
3 open it?

4 Q Yes, please.

5 A Okay.

6 Q And so, sir, you see here that this is
7 U.S. Patent 6,947,477?

8 A Yes, sir.

9 Q And you're okay if we refer to that as
10 the '477 patent throughout today. Right?

11 A Yes.

12 Q And you've read this patent probably
13 numerous times at this point. Right?

14 A Yes.

15 Q Can you describe for me in your own words
16 what is the problem that the '477 patent seeks to
17 solve?

18 A It's trying to create certain profiles at
19 the receiving station and in a manner that is
20 covered by the claims.

21 Q Is that a problem, in your mind, that
22 existed in the prior art?

1 MS. SPIRES: Object to form.

2 A I'm not sure as to what you're asking,
3 Counsel.

4 Q What I'm interested in, Doctor, is what
5 is the problem that the '477 patent seeks to
6 solve?

7 A I defer to the language in the
8 specification. And it refers to ways of --
9 advantages, ways of establishing a profile in the
10 claimed way.

11 Q When you say you "defer to the language
12 in the specification," what passage are you
13 looking at?

14 A I don't have a specific passage. I mean,
15 I have not opined on the specific benefits, I
16 would believe.

17 But I would defer to the language in the
18 specification where it refers to certain
19 advantages of setting up these profiles, creating
20 these profiles to facilitate receive operations.

21 Q Part of your answer might answer my
22 question.

1 In this proceeding you're not opining on
2 the benefits of the '477 patent. Right?

3 A I'm saying that the '477 is -- the claims
4 of the '477 that are discussed on I believe
5 patentability in view of the challenges.

6 Q Can you take a look at Figure 3 of the
7 '477 patent.

8 A Okay.

9 Q All right. And do you see the dashed box
10 314?

11 A Yes.

12 Q And you'll agree with me that the '477
13 patent describes that as a controller. Right?

14 A Again, I would defer to the language in
15 the specification itself. So if you go to the
16 specification.

17 Q Sure. Could I have you take a look at
18 Column 11. Let's look at Lines 9 through 14.

19 Can you read that to yourself.

20 A Yes.

21 Q So you'll agree with me that the box we
22 were looking at in Figure 3, it's labeled 314, is

1 a controller. Right?

2 A It refers to in the '477 patent
3 specification as the controller 314 includes a
4 control CPU 316 and a memory device 318.

5 Q Right. So in context of the controller,
6 like 314, what would a person of ordinary skill in
7 the art understand that to be?

8 MS. SPIRES: Object to form.

9 A Again, I cannot -- I'm not sure what you
10 are asking me, Counsel. I have not opined on the
11 term "controller."

12 Q So when a person of ordinary skill in the
13 art reads the patent, is controller 314 a piece of
14 hardware?

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

16 Q Is controller 314 a piece of software?

17 MS. SPIRES: Object to form.

18 A Again, I would defer to the language in
19 the spec, in the specification. I have not
20 offered a specific opinion on that.

21 Q So sitting here today, you can't tell me
22 one way or another what controller 314 is.

1 Is that fair?

2 MS. SPIRES: Object to form.

3 A All I can say is that it describes
4 controller 314 as -- in the '477 specification as
5 including a control CPU 316 and a memory device
6 318. And I don't have more than that.

7 Q So since controller 314 has to contain
8 CPU 316 and memory device 318, do you agree that
9 controller 314 is a physical device?

10 A I don't have an opinion on that, Counsel.
11 All I can say is that I will defer to the language
12 in the specification and I will not -- have not
13 offered such opinions on what the controller can
14 be or cannot be. All I can say is that the
15 controller in one -- in one long limiting
16 description, describes in one embodiment as
17 including a control CPU and a memory device.

18 Q Can you envision a scenario where
19 controller 314 is not a physical device and still
20 includes the control CPU and a memory device?

21 MS. SPIRES: Object to form.

22 A I don't have a -- I don't have an opinion

1 on that issue. That's not something I considered.

2 Q I want you to assume for the moment that
3 controller 314 is a profile parameter determiner.

4 Do you have that in your mind?

5 A As per your assumption?

6 Q Yeah.

7 A Okay. You have asked me to assume that
8 the controller 314 is a determiner.

9 Q Right. Then in your view, can memory 318
10 be a profile parameter storage device?

11 MS. SPIRES: Object to form.

12 A I don't -- as I said, Counsel, I don't
13 have -- I have not offered such an opinion. I
14 have offered an opinion that in the 314 -- in the
15 '477 patent, 318 is the storage device and, you
16 know, 316 is the determiner.

17 Q Right. I guess what I'm trying to get at
18 is, you've offered an opinion regarding the phrase
19 "coupled to." Right?

20 A My declaration describes that term in the
21 context of the board's decision that the
22 petitioner did not adequately identify what the --

1 what structures were coupled together, nor what
2 the structures themselves were.

3 Q Right. And in your view, the phrase
4 "coupled to" requires the profile parameter
5 determiner and the profile storage device to be
6 separate and distinct. Right?

7 A I have provided certain opinions on that
8 issue that are in my declaration that refers to
9 them as -- in one paragraph as different and
10 distinct, in the other paragraph is separate and
11 distinct in a similar manner. And I referred
12 to -- I referred to the patent owners who --
13 letter as well as the institution decision, for
14 example.

15 Q And so my question is, if "coupled to"
16 requires the two different components to be
17 separate and distinct, in your view can the
18 profile storage device be a subcomponent of the
19 profile parameter determiner?

20 A I don't have an opinion on that issue. I
21 have to rely on what my declaration would say, is
22 that the petitioner did not identify what the

1 prior art that it relied upon was, the alleged
2 profile parameter storage device or the profile
3 parameter determiner, nor did they identify what
4 these different and distinct components or
5 structures were, nor did they show how they were
6 coupled to. So that was my opinion where I agreed
7 with the board.

8 Q So your only opinion on is this is that
9 you agree with the board, you've not offered a
10 separate opinion on your own?

11 A My declaration contains all my opinions.
12 My opinion is that, Number 1, that the
13 petitioner did not identify what the parameter
14 storage -- profile parameter storage device was
15 adequately, nor the profile parameter determiner.
16 Nor did the petitioner identify how they were
17 different and distinct components, because they
18 did not identify any components at all. Nor did
19 they describe how the coupling portion of that
20 limitation was disclosed by the prior art grounds.
21 I agreed with that.

22 Further, I also add additional opinions,

1 saying that -- that even -- even when the
2 petitioner did not identify the structures, the
3 petitioner has not also identified how both the
4 signal-related parameter and the channel-related
5 parameter would be stored in the same storage
6 device. That is also missing. And that is where
7 I discuss in Paragraphs 58 onwards.

8 So I have a number of opinions that I
9 discuss in the context of various grounds that are
10 disclosed in my opinions with respect to the lack
11 of identification of the components, the lack of
12 identification of the coupling, the lack of
13 identification that any alleged storage device
14 contains both types of parameters, and so on.

15 So I believe that I agree there was no
16 adequate description disclosure or analysis in the
17 petitioner's papers.

18 Q What makes a component separate and
19 distinct from another component?

20 A It has to be --

21 MS. SPIRES: Object to form.

22 A Again, as an example, you would have

1 something like, in a nonlimiting manner. Again,
2 these are not limiting descriptions. But example
3 in Figure 3 of the '477, you have a separate and
4 distinct component 318, which is a memory storage
5 device. And you have a separate and distinct
6 component called 316, that is a determiner.

7 Q Is 318 separate and distinct from 314?

8 A Again, I don't offer a different opinion.
9 I don't offer an analysis of those ideas. But as
10 I describe, that they have to be two components
11 which are coupled should be separate, different,
12 and distinct.

13 Q How about if you just took a general CPU
14 like 316; do you think that CPU would have some
15 sort of memory or cache on it?

16 MS. SPIRES: Object to form.

17 A Again, I'm not sure what you're referring
18 to. But I don't see such analysis or
19 identification or any such description in the
20 petitioner's papers.

21 Q I'm talking more generally. Well, how
22 about this: What about if you look at Figure 3

1 and you look at Item 304.

2 Do you see that?

3 A Okay.

4 Q Is 304 separate and distinct from
5 Subcomponent 305?

6 A Again, I have not done the analysis,
7 Counsel. My understanding is that 318 and 316 are
8 separate and distinct and they're coupled in the
9 manner shown in Figure 3. I don't have other
10 opinions.

11 Q How would a person of skill in the art go
12 about determining if two components were separate
13 and distinct?

14 A As I said, one example would be to show
15 that you had the two components, such as 318 and
16 316, that were separate and distinct. That would
17 be one nonlimiting example. So I don't have a
18 specific answer except that it depends on the
19 reference, it depends on how it is disclosed. I
20 believe that there was no such disclosure by the
21 petitioner as to what they allege are these
22 claimed structures and components and devices.

1 Q Are you familiar with a structure called
2 a system-on-a-chip?

3 A I'm familiar with the general term called
4 system-on-a-chip.

5 Q And in your mind, what is a
6 system-on-a-chip?

7 MS. SPIRES: Object to form.

8 A A system-on-a-chip again depends on the
9 context. It could mean different things in
10 different contexts.

11 Q Give me an example, please.

12 A An example could be where you are trying
13 to integrate some circuitry on a single substrate.

14 Q And sometimes that circuitry on a single
15 substrate would be, let's say, a CPU and a memory.

16 Fair?

17 A As I said, Counsel, I cannot offer a
18 specific answer. I can give you, as I said, a
19 system-on-a-chip is an abstract concept that can
20 mean different things in different contexts.

21 Q Would you agree that a system-on-a-chip
22 could include a scenario that has a CPU and a

1 memory?

2 A It depends on the context and it depends
3 on what is disclosed. It could; it need not. I
4 don't know.

5 Q Let's say in the context where I have a
6 system-on-a-chip that has a CPU and a memory, how
7 would a person of skill in the art determine
8 whether that CPU and memory are separate and
9 distinct?

10 MS. SPIRES: Object to form.

11 A I don't know, Counsel. It depends on the
12 context. I have to look at it, and I would have
13 to show and identify a particular structure as
14 being the storage device and a particular
15 structure as being a determiner, and identify
16 different structures that are distinct and
17 separate and they are coupled in some way.

18 But I believe the petitioner has made no
19 such effort.

20 Q In terms of your argument regarding
21 "coupled to," are you offering a construction, or
22 are you offering that that is the plain and

1 ordinary meaning to one of skill in the art?

2 A I'm not offering, like, any construction.
3 I believe that, you know, it's the petitioner's
4 burden to show that two structures were coupled.
5 They've not even shown the structures, let alone
6 the coupling.

7 Q In your view, then, does the plain and
8 ordinary meaning of "coupled to" require two
9 separate and distinct components?

10 MS. SPIRES: Object to form.

11 A Again, I said I'm not offering a
12 construction. All I'm saying is that the
13 petitioner has not shown what these components or
14 devices are, and nor has the petitioner shown how
15 they're coupled to the extent something was shown,
16 which it was not. So that was where I agreed with
17 the board's decision. It's a failure of proof,
18 which is the burden of the petitioner.

19 Q I just dropped into the chat Exhibit
20 2003.

21 (Exhibit 2003, previously marked, not
22 attached.)

1 Q Can I have you open it when you get a
2 chance.

3 A Okay.

4 Q And Exhibit 2003, this is the declaration
5 you submitted in this proceeding. Right?

6 A Yes.

7 Q Can I have you scroll to Paragraph 57,
8 please?

9 A Okay.

10 Q And in this paragraph one of the things
11 you wrote is that "a POSA would naturally
12 understand that such coupling can only take place
13 between two separate and distinct components."

14 Do you see that?

15 A Yes.

16 Q And so what I am trying to understand is,
17 are you suggesting that is what the plain and
18 ordinary meaning of "coupling" to a person of
19 skill in the art, in context of the '477 patent?

20 A No. All I'm saying is that a POSA would
21 understand that coupling can take place between --
22 can only take place between two separate and

1 distinct components, as supported by the various
2 examples in the specification.

3 Q Do you agree with the statement that
4 "coupled to" means joined or connected to in any
5 way?

6 MS. SPIRES: Object to form.

7 A Where do you see that, Counsel, in my
8 declaration?

9 Q It's not in your declaration --

10 A I don't have --

11 Q -- as far as I know.

12 A Yeah, I don't have an opinion on that
13 issue.

14 Q So then fair to say that in your
15 declaration in this proceeding, you did not apply
16 that the phrase "coupled to" means joined or
17 connected to in any way. Right?

18 A As I said, I don't offer an opinion on
19 what specifically coupling should be construed as.

20 I say that coupling, I don't believe that
21 anyone else construed the term "coupling." But my
22 understanding is that a nonlimiting example of

1 coupling can be connected. But again, I don't
2 offer specifically a construction for coupling. I
3 just say that I agree with the board that the
4 petitioner did not identify the devices which are
5 the storage device or the parameter determiner,
6 nor have they pointed to as to how these are
7 coupled as claimed, among other distinctions and
8 failings.

9 Q My question was a little bit different.

10 In forming your opinions in this
11 declaration, you did not apply the construction
12 of -- for the phrase "coupled to" as meaning
13 joined or connected to in any way. Correct?

14 MS. SPIRES: Object to form.

15 A As I said, Counsel, I'm not seeing such a
16 construction from any party or any side. All I've
17 said is that my opinions apply to the -- my
18 opinions said that the petitioner did not identify
19 the two structures, nor showed that they were
20 coupled in any way or any -- any such
21 identification of how the petitioner understood in
22 an adequate manner that they were coupled to the

1 extent they were described.

2 Because even though the -- even though
3 these devices were not even disclosed or described
4 by the petitioner.

5 Q Okay. Can I have you go back to the '477
6 patent, which is Exhibit 1001.

7 A Uh-huh.

8 Q Can I have you center your attention on
9 Paragraph -- or Column 11. And it's really around
10 Lines 58 where it starts talking about
11 signal-related parameters.

12 Do you see that?

13 A I see that.

14 Q Okay. And then below that it talks about
15 channel-related parameters. Right?

16 A Yes.

17 Q How does a person of skill in the art in
18 the context of the '477 patent determine what is a
19 signal-related parameter versus a channel-related
20 parameter?

21 MS. SPIRES: Object to form.

22 A Like I said, Counsel, that's not

1 something I offered an opinion on. And I would
2 defer again to the specification. Examples of
3 such parameters are provided in the specification,
4 but I don't offer a construction.

5 Q There are some examples provided in the
6 passage we're looking at here. For example, it
7 will say, For an error correction of the burst,
8 change in frequency of the burst, change in time
9 of the burst, changes in power level of the burst.

10 Those are signal-related parameters.

11 Right?

12 A Again, that's what the specification says
13 and as these parameters include as nonlimiting
14 examples of some kind. But I don't have a
15 specific opinion in my declaration in this matter
16 as to how these terms are to be construed.

17 Q In context of the '477 patent, do you
18 have an opinion as to other -- what are other
19 signal-related parameters?

20 A I don't.

21 Q And then in the same passage there's some
22 examples of channel-related parameters. Right?

1 A The specification describes as
2 channel-related parameters include, dot, dot, dot,
3 in Lines 60 through 65.

4 Q And so then sitting here, you don't have
5 an opinion as to other channel-related parameters.

6 Right?

7 A I don't offer such opinions. I defer to
8 the language in the specification. But in this
9 declaration I do not construe these terms.

10 Q Do you have an opinion as to what is the
11 difference between a signal and a channel, in
12 context of the '477 patent?

13 A I don't specifically offer a definitive
14 opinion. I mean, I just rely on the specification
15 for examples.

16 Q What is a burst data signal?

17 MS. SPIRES: Object to form.

18 A Again, the claims use the -- use the
19 term -- the specification uses the term burst --
20 "burst," and examples of the burst are provided in
21 the specification.

22 For example, if you look at the

1 specification, it looks at some discrete
2 transmissions of data from the subscriber station
3 to the base station. Such examples are provided.

4 Q What about that makes it a burst, though?

5 MS. SPIRES: Object to form.

6 A I don't have a specific construction
7 again, Counsel. I just have utilized the
8 examples. I did not provide an analysis for the
9 term "burst" at this point.

10 Q Can I have you look at Claim 1 for a
11 moment?

12 A Okay.

13 Q And I want to look at that last element
14 that starts "a profile parameter storage device,"
15 and then it goes on.

16 Do you see that?

17 A On Column 13?

18 Q Yes, sir.

19 A Okay.

20 Q All right. So one of the things the
21 profile parameter storage devise does is, it's for
22 storing values representative of the at least one

1 signal-related parameter and the at least one
2 channel-related parameter.

3 Do you see that?

4 A I do.

5 Q Now, you'd agree that storing values that
6 are representative of those parameters does not
7 necessarily mean you store the parameters. Right?

8 A I don't have an opinion on that issue. I
9 defer to the language in the claims.

10 Q So you don't know one way or the other
11 whether the claims require the profile parameter
12 storage device to store the signal and related
13 channel parameters, as opposed to something that
14 is representative of those parameters?

15 A Again, I would not like to change the
16 language of the claims. All I would say is that
17 the claims require storing values representative
18 of at least one signal parameter. So the
19 petitioner has to show that, how these values that
20 they allege in the various grounds are
21 representative of at least one signal-related
22 parameter, and so on.

1 So it's their burden to show that.
2 Whatever they provide, I mean, in the petition,
3 they should be able to make an adequate
4 articulation of their thesis that what they
5 identify is representative of those parameters as
6 claimed.

7 Q So I dropped into the chat Exhibit 1002,
8 which is the file history for the '477 patent.

9 Let me know when you have that.

10 (Exhibit 1002, previously marked, not
11 attached.)

12 A Okay. I am still trying to download it.
13 I have to open it before I download it.

14 Q That's okay.

15 A I have opened it, sir.

16 Q Can I have you jump to Page 189.

17 A Of the PDF?

18 Q Yes, sir.

19 A Okay.

20 Q And you've reviewed, you've seen a copy
21 of the '477 file history before. Right?

22 A I mean, I have. I've reviewed it

1 briefly. I don't remember it at this point 20 --
2 I mean, these are one of the documents that I
3 reviewed. I don't remember it very clearly at
4 this point.

5 Q Okay. Are you on Page 189?

6 A Yes. It says Page 11 of 14.

7 Is that the one?

8 Q That's the one.

9 A Okay.

10 Q Let's focus on the second-to-last
11 paragraph that says -- starts with Independent
12 Claims 1 and 16.

13 A Uh-huh.

14 Q Do you see that?

15 A I do.

16 Q All right. I'm actually interested in
17 the last two sentences of this paragraph. Why
18 don't you go ahead and read those to yourself, and
19 let me know when you're done.

20 A The one beginning with, "The office
21 action alternatively"?

22 Is that the one?

1 Q Yes. That's correct.

2 A Okay, I have reviewed these.

3 Q Do you agree with the statement here that
4 a parameter cannot be both a signal-related
5 parameter and a channel-related parameter?

6 A I don't have an opinion on that issue,
7 Counsel.

8 Q How about AGC; is that a signal-related
9 parameter or a channel-related parameter?

10 A I don't -- I mean, I don't remember these
11 references clearly enough.

12 I believe that an infringement analysis
13 or a validity analysis has to have adequate
14 explanation. And it depends on the reference, how
15 it discloses what these values are. It all
16 depends on the system, how it has been programmed,
17 and things like that.

18 So I don't have an opinion on this
19 particular portion of the file history at this
20 point.

21 Q So I guess fair to say AGC in your view
22 could be a signal- or a channel-related parameter,

1 depending on how it's being used?

2 MS. SPIRES: Objection.

3 A I don't have an opinion on that issue,
4 Counsel.

5 Q How about CTL; do you have an opinion on
6 whether that is or is not a signal- or
7 channel-related parameter?

8 A As described in the file history, I do
9 not have an opinion on those terms as used in the
10 file history.

11 Q And equalization, do you have an opinion
12 on whether that is a signal- or channel-related
13 parameter?

14 A As I said, this is referring to specific
15 references like Shiue and others. And we're also
16 talking about office action. And we're talking
17 about office action referring to AGC, CTL, and
18 equalization from Shiue. These are not general
19 terms. Taken out of context. So I don't have an
20 opinion on these terms as used in Shiue.

21 Q Now, the '477 patent describes
22 equalization as being a channel-related parameter.

1 Right?

2 A As I said, Counsel, the specification
3 speaks for itself in the right context. I don't
4 have a specific opinion on what parameters are
5 what, other than referring to the specification.

6 Q And you're unable to give me any guidance
7 as to how a person of skill in the art would
8 determine whether something is a signal-related or
9 channel-related parameter. Right?

10 A At this point I have not offered such an
11 opinion. If asked and allowed in other contexts,
12 I may have offer such opinions. But sitting here
13 today for this IPR and my declaration, I have not
14 offered such a construction.

15 Q Based on your work in the IPR and the
16 declaration you provided, are there any claim
17 terms that you believe a person of skill in the
18 art would not understand the plain and ordinary
19 meaning of?

20 A That is not something I considered as a
21 part of my analysis. I did not offer such an
22 opinion. All my opinions are captured in my

1 declaration.

2 Q I dropped into the chat, let's see, it
3 should be Exhibit 1007.

4 (Exhibit 1007, previously marked, not
5 attached.)

6 A Okay. Let me download it then.

7 Yes, I have downloaded Exhibit 1007 and I
8 have opened it.

9 Q Can I have you turn to Figure 1, please.

10 A Okay.

11 Q And do you see towards the bottom of
12 Figure 1 there are four different slot processors?

13 A I see that Figure 1 of the '470 patent,
14 which I believe is Barratt, is referring to a Slot
15 0 processor, a Slot 1 processor, a Slot 2
16 processor, and a Slot 3 processor which are the
17 56000 DSPs from Motorola.

18 Q Right. And you're familiar with the
19 56000 series of DSPs from Motorola. Right?

20 A Yes.

21 Q Yeah. And you would agree with me that
22 the 56000 series of processors from Motorola have

1 memories on them. Correct?

2 MS. SPIRES: Object to form. Outside the
3 scope.

4 A I don't remember.

5 Q So sitting here today, you don't know one
6 way or the other whether the Motorola 56000 series
7 of processors have memory on them?

8 MS. SPIRES: Object to form.

9 A I don't remember. Yeah, I don't remember
10 what -- what they had.

11 Q All right. Can we go back to Exhibit
12 2003, which is your declaration.

13 A Okay.

14 Q Can I have you look at Paragraph 59 for
15 me?

16 A Okay.

17 Q The question I have for you is, towards
18 the very tail end of this you reference Claims 1
19 through 15 or 18.

20 A Uh-huh. Yes.

21 Q And I just want to make sure I understand
22 your opinion as it relates to the context of Claim

1 18.

2 Is it your opinion that for Claim 18 the
3 signal-related parameter and channel-related
4 parameter have to be stored in the same storage
5 device?

6 A For Claim 18?

7 Q Yes, sir.

8 A So Claim 18 is the method of Claim 16,
9 wherein the receiving station is operable in a
10 communication system in which the communication
11 protocols include a contention period, where
12 the -- wherein the initial burst of the first
13 burst data signal is responsive to which the at
14 least one signal-related parameter and at least
15 one channel-related parameter are determined is
16 transmitted. And it depends on Claim 16.

17 I believe that that portion that you're
18 referring to in my declaration simply says that a
19 construction of that claim term is not -- that a
20 determination whether they belong to same storage
21 device or not is not necessary to any of the
22 claims. That's all I said. That I agreed that

1 there is no reason to make a determination one way
2 or the other for any of the challenged claims,
3 because the petitioner has fallen short and not
4 adequately identified or met that burden of what
5 these components are and how they should be
6 coupled, let alone get into whether something was
7 stored in a particular way in a particular storage
8 device.

9 Q Got it. So in Paragraph 59 you're not
10 offering the opinion that Claims 16 and 18 require
11 the signal-related parameter and channel-related
12 parameters to be stored in the same storage
13 device. Right?

14 A That's not the purpose of my description
15 in Paragraph 59. It just says that the
16 allegations by the petitioner fall short and don't
17 identify this components coupling, let alone any
18 other feature as in the claim. So, therefore, a
19 construction or a determination of this particular
20 issue is not relevant or needed for any of the
21 petitioner's challenge.

22 MR. DAVISON: Perfect.

1 Doctor, like I said, this will be a short
2 depo. I have no further questions. Thank you
3 very much.

4 THE WITNESS: Thank you, Counsel.

5 MS. SPIRES: No questions on my end
6 either.

7 THE WITNESS: I would like to review my
8 transcript and sign, if that is possible.

9 (Off the record at 9:56 a.m. EDT.)
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ACKNOWLEDGMENT OF DEPONENT

I, VIJAY K. MADISETTI, Ph.D., do hereby
acknowledge that I have read and examined the
foregoing testimony, and the same is a true,
correct and complete transcription of the
testimony given by me, and any corrections appear
on the attached Errata sheet signed by me.

(DATE)

(SIGNATURE)

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C E R T I F I C A T E

I, Debra Ann Whitehead, E-Notary Public in and for
the Commonwealth of Virginia, do hereby certify:

That VIJAY K. MADISETTI, Ph.D., the
witness whose deposition is hereinbefore set forth,
was duly sworn by me before the commencement of such
deposition and that such deposition was taken
virtually and is a true record of the testimony
given by such witness.

I further certify that the adverse party,
GENERAL ACCESS SOLUTIONS, LTD., was represented by
counsel at the deposition.

I further certify that the deposition of
VIJAY K. MADISETTI, Ph.D., occurred virtually, on
Tuesday, September 24, 2024, from 9:03 a.m. to 9:56
a.m. EDT.

1 I further certify that I am not related to
2 any of the parties to this action by blood or
3 marriage, I am not employed by or an attorney to any
4 of the parties to this action, and that I am in no
5 way interested, financially or otherwise, in the
6 outcome of this matter.

7

8 IN WITNESS WHEREOF, I have hereunto set my
9 hand this 30th day of September, 2024.

10

11 My commission expires:

12 October 31, 2027

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Vijay K. Madisetti



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