

Deposition of
Sean O'Bryan
November 15, 2024

Qualcomm
vs.
Network System Technologies



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Page 1

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 BEFORE THE PATENT TRIAL AND APPEAL BOARD

3

4 QUALCOMM INCORPORATED

5 Petitioner

6 v.

7 NETWORK SYSTEM TECHNOLOGIES, LLC

8 Patent Owner

9 U.S. Patent No. 7,594,052

10 Inter Partes Review No. IPR2024-00343

11

12 REMOTE DEPOSITION OF SEAN O'BRYAN

13 NOVEMBER 15, 2024

14 SAN DIEGO, CALIFORNIA

15

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17 REPORTED BY: PATRICIA Y. SCHULER, CSR NO. 11949

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23 JOB NO. 10153245

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Page 3

1 APPEARANCES:

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Page 2

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4 QUALCOMM INCORPORATED

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7 NETWORK SYSTEM TECHNOLOGIES, LLC

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9 U.S. Patent No. 7,594,052

10 Inter Partes Review No. IPR2024-00343

11

12 Remote deposition of SEAN O'BRYAN, taking place

13 via Zoom, beginning at 12:05 p.m., and ending at

14 12:57 p.m., PST on Friday, November 15, 2024, before

15 Patricia Y. Schuler, Certified Shorthand Reporter No.

16 11949, licensed by the State of California.

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Page 4

1 I-N-D-E-X

2 WITNESS: EXAMINATION

3 SEAN O'BRYAN PAGE

4 MR. HOLT 5

5

6

7 E-X-H-I-B-I-T-S

8 NUMBER DESCRIPTION PAGE

9 Exhibit 1027 Declaration by S. O'Bryan 7

dated December 1, 2023

10

11 Exhibit 1007 Document entitled "Chapter 4. 26

Guaranteeing the quality of

services and Networks-on-Chip"

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Page 5

1 AUSTIN, TEXAS; FRIDAY, NOVEMBER 15, 2024
2 12:05 p.m.
3
4 SEAN O'BRYAN,
5 having been administered an oath, was examined and
6 testified as follows:
7
8 EXAMINATION
9 BY MR. HOLT:
10 Q. Good afternoon, Mr. O'Bryan. Can you
11 state your full name for the record.
12 A. Sean O'Bryan.
13 Q. Thank you. My name is Mr. Benjamin Holt.
14 I am counsel for patent owner NST in this
15 proceeding.
16 Is there any reason, Mr. O'Bryan, you
17 can't give complete, truthful, and accurate
18 testimony today?
19 A. No.
20 Q. Have you been deposed before,
21 Mr. O'Bryan?
22 A. No.
23 Q. So I would like to cover some basic
24 ground rules, then, so we are on the same page,
25 especially since this deposition is remote.

Page 6

1 So the court reporter is here to record
2 what we are saying. So please answer each question
3 with a verbal response rather than, for example,
4 nodding or shaking your head, okay?
5 A. Yes, sir.
6 Q. Today's deposition will be fairly short,
7 but please let me know if you do need a break, and
8 we'll take a break as soon as possible based on
9 where we are in the questioning. Okay?
10 A. Yes.
11 Q. If you don't understand one of my
12 questions for some reason, please say so, and I can
13 repeat the question or if needed, I'll do my best
14 to rephrase it. Okay?
15 A. Yes, sir.
16 Q. So your attorney may make objections. If
17 so, you are still obligated to answer the question
18 unless your attorney specifically instructs you not
19 to answer the question. Okay?
20 A. Yes, sir.
21 Q. Do you understand that your testimony
22 will be under oath and that you must answer
23 truthfully?
24 A. Yes.
25 Q. So because this is remote deposition, I

Page 7

1 just want to ask, where are you physically located
2 today?
3 A. I am in the Flawn Academic Center at the
4 campus of the University of Texas at Austin.
5 Q. Did you bring any documents to the
6 deposition with you?
7 A. I just have the exhibit document, my
8 declaration.
9 Q. And are there any notes or markings on
10 the document?
11 A. No.
12 Q. Any other documents?
13 A. No.
14 Q. Thanks.
15 So, Mr. O'Bryan, you understand that you
16 are sitting for this deposition to discuss that
17 declaration that you executed that was submitted in
18 a Patent Office proceeding, correct?
19 A. That is what I understand, yes.
20 (Exhibit 1027 was marked for
21 identification.)
22 BY MR. HOLT:
23 Q. So I am going to submit into the chat now
24 a document that has been premarked as Exhibit 1027.
25 Do you recognize this as the declaration

Page 8

1 that you executed on December 1, 2023, Mr. O'Bryan?
2 MR. ROSEN: Can he look at his own, or do
3 you want him to look at the one on the screen?
4 BY MR. HOLT:
5 Q. He can use his own.
6 Is that also the declaration that was marked
7 as 1027?
8 A. Yes, exactly. Exhibit 1027.
9 Q. Yes, that is fine. And to confirm, you
10 stated previously that there are no notes or
11 markings on that copy that you have?
12 A. There are not.
13 Q. Thanks.
14 So you are a librarian with UT Libraries,
15 correct?
16 A. That is correct.
17 Q. When were you initially employed for UT
18 Libraries?
19 A. I started at UT Libraries in 1999.
20 Q. What position did you hold at that time?
21 A. I was a library specialist.
22 Q. What position did you hold at UT
23 Libraries in 2003?
24 A. I was not with Libraries in 2003. I had
25 a year or two year gap when I lived in another

Page 9 1 city. 2 Q. So when did that gap begin and end? 3 A. I don't have the exact dates; 2001 to 4 around -- oh, maybe, no, 2002, '3 to around 2005. 5 Q. So you were not employed with UT 6 Libraries from the beginning of 2003 to the end of 7 2003, correct? 8 A. I don't know the exact dates. 9 Q. But you stated that you were not employed 10 with UT Libraries in 2003, correct? 11 A. Yes. I believe that is when I left my 12 position for approximately two years. 13 Q. Got it. 14 So if we go to Paragraph 5 of your 15 declaration, it states that "Networks-on-Chip was 16 cataloged in April 16, 2003," correct? 17 A. That is correct. 18 Q. So when I refer to, during this 19 deposition, to "Networks-on-Chip," you understand I 20 am referring to this book held by UT Libraries, 21 okay? 22 A. Yes. 23 Q. You would agree that the Networks-on-Chip 24 was not available from UT Libraries before 25 April 16, 2003, correct?	Page 11 1 A. Okay. 2 Q. In the note at the bottom of Page 1 3 refers to a new ALMA Library service platform that 4 UT Libraries has used as a catalog system since 5 2020, correct? 6 A. Yes. 7 Q. So during this deposition when I refer to 8 the ALMA system, you understand I am referring to 9 UT Libraries' new cataloging system since 2020. 10 Okay? 11 A. Yes. 12 Q. This note at the bottom of Page 1 also 13 refers to the old UT Cat/UT Netcat catalog system 14 that UT Libraries used prior to 2007, correct? 15 A. Yes. 16 Q. So during this deposition when I refer to 17 the UT Cat system, I am referring to that old 18 system from pre2007. Okay? 19 A. Yes. 20 Q. So the Networks-on-Chip book was 21 originally cataloged in the UT Cat system, right? 22 A. Correct. 23 Q. And specifically in 2003, the 24 Networks-on-Chip book would have been cataloged in 25 the UT Cat system, correct?
Page 10 1 A. Available to the public? 2 Q. Well, your Paragraph 5 says that 3 Networks-on-Chip was cataloged on April 16, 2003, 4 right? 5 A. That is correct. 6 Q. So the Networks-on-Chip book would not 7 have been available from UT Libraries prior to the 8 April 16, 2003, right? 9 A. Correct. 10 Q. If you go to Exhibit A of your 11 declaration, at the bottom in Statistics Note 1, 12 there is a UT date that is highlighted there and it 13 indicates April 16, 2003, right? 14 A. Correct. 15 Q. And so this UT date of April 16, 2003 16 that is highlighted in this Statistics Note 1 of 17 Exhibit A is your basis for stating in Paragraph 5 18 that the Networks-on-Chip book was cataloged on 19 April 16, 2003; is that right? 20 A. Yes. 21 MR. KOHLHEPP: Object to form. 22 BY MR. HOLT: 23 Q. Let's go to the note at the bottom of 24 Page 1 top of Page 2. Let me know when you are 25 there.	Page 12 1 A. That is correct. 2 Q. And according to the note at the bottom 3 of Page 1, the UT Cat system was locally developed 4 catalog system, correct? 5 A. That is correct. 6 Q. Also, according to that note at the 7 bottom of Page 1, data had to be migrated from that 8 UT Cat system to the ALMA system in 2020, correct? 9 A. Yes. As the note on explains, we had 10 another system during the period between those two 11 systems as well. 12 Q. Understood. 13 So the data from the UT Cat system had to 14 be migrated to the ALMA system in 2020, and could 15 have perhaps been intermediately migrated to the 16 Sierra system; is that right? 17 MR. ROSEN: Object to form. 18 BY MR. HOLT: 19 Q. You can answer. 20 A. Yes. The data was migrated from the UT 21 Cat system to the Sierra system, and then 22 subsequently to the ALMA system. 23 Q. Gotcha. 24 And specifically, the bottom of the note, 25 you state that the catalog date for records from

Page 13 1 the UT Cat system was archived in ALMA at the item 2 level as the UT date in Statistics Note 1; is that 3 right? 4 A. Correct. 5 Q. So Paragraph 6 of your declaration says 6 that the cataloging record for the Networks-on-Chip 7 book is attached as Exhibit A, correct? 8 A. Correct. 9 Q. And this Exhibit A is the catalog record 10 from the ALMA system, correct? 11 A. Correct. 12 Q. So Exhibit A in your declaration is not 13 the catalog record from the original UT Cat system 14 for the Networks-on-Chip book, correct? 15 MR. KOHLHEPP: Objection to form. 16 THE WITNESS: That is correct. 17 BY MR. HOLT: 18 Q. As we looked at before, the UT date 19 indicated and highlighted in the Statistics Note 1 20 at the bottom of Exhibit A is the purported catalog 21 date originally from the UT Cat system, correct? 22 A. That is correct. 23 Q. And so this UT date in Statistics Note 1 24 was migrated into the ALMA system from UT Cat, or 25 perhaps intermediately via migration from the	Page 15 1 MR. KOHLHEPP: Object to form. 2 THE WITNESS: Yeah. As someone who works 3 with any system, there is manual intervention to 4 perform the extract, but it is a systematic process 5 like a programmatic process. 6 BY MR. HOLT: 7 Q. So we were looking at the note at the 8 bottom of Page 1, top of Page 2 in your 9 declaration. Other than the note at the bottom of 10 Page 1 and top of Page 2, your declaration does not 11 include any other mention of the UT Cat system, 12 correct? 13 MR. KOHLHEPP: Object to form. 14 THE WITNESS: That is correct. 15 BY MR. HOLT: 16 Q. At the end of that note at the top of 17 Page 2, you state that the catalog date from UT Cat 18 was archived in the ALMA system as the UT date, 19 correct? 20 A. Correct. 21 Q. This note on Pages 1 and 2 does not 22 identify any other specific information from the UT 23 Cat system that them was archived into the ALMA 24 system, correct? 25 MR. KOHLHEPP: Objection as to form.
Page 14 1 Sierra system, into the ALMA system, correct? 2 A. Correct. 3 Q. How was the UT date in Statistics Note 1 4 migrated from the UT Cat system into the ALMA 5 system? 6 A. It was a note that was -- it was a date 7 that was in the subsequent Sierra system, and in 8 order to retain that date of the original 9 cataloging date, it was migrated into the ALMA 10 system with the UT date note. And it was migrated 11 in the raw data to ALMA. 12 Q. So you said it was migrated in the raw 13 data? 14 A. In the extract data. 15 Q. Was that a computer program that did the 16 migration of the raw data? 17 A. Yes, with staff intervention to collate 18 the data, and then it is migrated as you populate a 19 new system like any database. 20 Q. Was any of the migration done by hand? 21 A. With the help of systems, yes. I mean, 22 essentially, staff extract the data and work with a 23 vendor to migrate it into a new system. 24 Q. So was any of the extraction done by 25 hand?	Page 16 1 THE WITNESS: You are referring to the -- 2 MR. ROSEN: No, I think to clarify, you 3 are referring to the notes at the bottom of Page 1 4 that goes to the top of Page 2, you are still there, 5 right? 6 MR. HOLT: Correct. 7 MR. ROSEN: Not the notes on Exhibit A. 8 MR. HOLT: Right. 9 BY MR. HOLT: 10 Q. I can restate the question. 11 Mr. O'Bryan, in the note at the bottom of 12 Page 1, top of Page 2 of your declaration, other 13 than the catalog date, that note does not identify 14 any other specific information from the UT Cat 15 system that was archived in the ALMA system for the 16 Networks-on-Chip book; is that correct? 17 A. Correct. It does not state that. 18 MR. KOHLHEPP: Object to form. 19 BY MR. HOLT: 20 Q. Mr. O'Bryan, how many libraries are there 21 in the UT Libraries system? 22 A. I can cross check it, but approximately 23 maybe 10, including the main research library. 10 24 to 12, maybe. I would have to look. 25 Q. So is there a McKenney Engineering

Page 17 1 Library in the UT Libraries? 2 A. Yes, there is. 3 Q. Is there also a Kuehne Physics 4 Mathematics Astronomy in UT Libraries? 5 A. Yes, sir. 6 Q. Let's go to Exhibit A of your 7 declaration, looking specifically at the bottom 8 right under "Holdings," if you can let me know when 9 you are there. 10 A. Okay. I am there. 11 Q. So at the bottom right of Exhibit A under 12 "Holdings," it identifies the Life Science Library, 13 correct? 14 A. That is correct. 15 Q. This identification of the Life Sciences 16 Library under the Holdings in Exhibit A also 17 indicates the year 2003, correct? 18 A. Correct. 19 Q. So this indicates that the 20 Networks-on-Chip book has been held in the Life 21 Sciences Library since 2003; is that right? 22 A. No. The 2003 is the date of the call 23 number. 24 Q. Okay. So in 2003, the Networks-on-Chip 25 book would have been held in the Life Sciences	Page 19 1 records with field codes; is that right? 2 A. Exhibit A is a MARC record with field 3 codes. 4 Q. Understood. The field code 005 is the 5 date and time of latest transaction, correct? 6 A. I am not sure. 7 Q. If you look at the field code 040, are 8 you aware that the field code 040 shows the 9 cataloging source? 10 A. Yes. 11 Q. And under the 040 field, the subfield A 12 shows that the original cataloging agency that 13 created this catalog record is DLC; is that right? 14 A. Correct. 15 Q. Who is DLC? 16 A. It is the cataloging code for the Library 17 of Congress. 18 Q. Also under the 040 field, the subfield D 19 shows that the latest modifying agency was IXA, 20 correct? 21 A. IXA is in subfield D, correct. 22 Q. And who is IXA? 23 A. It is the UT Austin symbol. 24 Q. Gotcha. 25 So this catalog record was not originally
Page 18 1 Library; is that right? 2 A. I can't answer that. There are things 3 that potentially get transferred between libraries. 4 What you are looking at is the call number date of 5 the item, the Library of Congress call number date 6 that is part of the call number. 7 Q. Okay. 8 A. And that is usually the date something 9 was published. 10 Q. This references to the Life Sciences 11 Library under the Holdings indicates that the 12 Networks-on-Chip book is held in the Life Sciences 13 Library of UT Libraries; is that right? 14 A. Currently, yes. 15 Q. So there is no indication here as to 16 which library of the UT Libraries the 17 Networks-on-Chip book was held in during 2003; is 18 that right? 19 A. Not that I am aware. 20 Q. Mr. O'Bryan, are you familiar with 21 Machine-Readable Catalog records or MARC -- that's 22 M-A-R-C records? 23 A. Yes. 24 Q. So looking at Exhibit A, the catalog 25 record shown in Exhibit A contains a list of MARC	Page 20 1 cataloged by UT Libraries, correct? 2 A. Correct. 3 Q. The 900 level field codes are for local 4 use by UT Libraries, correct? 5 A. I am not sure. 6 Q. Do you know what the 907 field code 7 means? 8 A. Not entirely beyond that it was a 9 migratory field, and it shows the idiographic 10 number of the previous system for the MARC record. 11 Q. Do you know what the 945 field code 12 means? 13 A. That is another migratory field showing 14 various elements of a record, including the call 15 number, the bar code, a note, and some other -- you 16 know, an old item number. Information like that. 17 Q. In the 907 field code there's a date of 18 March 11, 2007. 19 Do you see that? 20 A. Yes. 21 Q. Do you know what this date is? 22 A. Not exactly. I believe it was the 23 migration date for the Sierra system. 24 Q. In the 945 field code, there is a date of 25 August 27, 2010.

Page 21 1 Do you know what that date is? 2 A. No, I do not. 3 Q. The UT date in Statistics Note 1 of 4 April 16, 2003 is not reflected in any of the MARC 5 field codes in Exhibit A; is that correct? 6 MR. KOHLHEPP: Objection as to form. 7 THE WITNESS: No, it is not. 8 BY MR. HOLT: 9 Q. Let's go to Page 6 of your declaration, 10 which is part of Exhibit B. If you could let me 11 know when you are there, please. 12 A. Okay. 13 Q. So Page 6 in Exhibit B shows due date 14 stamps on the left side based on when the 15 Networks-on-Chip book was checked out, correct? 16 A. That is what it appears, yes. 17 Q. And this Page 6 also shows stamps on the 18 right side for when the Networks-on-Chip book was 19 returned and what library it was returned to, 20 correct? 21 A. That is what it appears, yes. 22 Q. These stamps on Page 6 were not recorded 23 in the catalog record, correct? 24 A. I did not examine that. 25 Q. Looking at the stamps on Page 6, the	Page 23 1 this book was not available from UT Libraries 2 during that period; is that right? 3 A. If that is accurate and it was checked 4 out to an individual during that time, that is 5 correct. 6 MR. KOHLHEPP: Object to form. 7 BY MR. HOLT: 8 Q. According to the stamps on Page 6, this 9 Networks-on-Chips was checked out only once in 10 2003; is that right? 11 A. According to the stamps, that is what it 12 appears. 13 Q. Your declaration does not include any 14 records or information of this Networks-on-Chips 15 book being checked out other than the stamps on 16 Page 6, correct? 17 A. Correct. 18 Q. These stamps on Page 6 of your 19 declaration do not indicate who checked out the 20 book or which library it was checked out from, 21 correct? 22 A. Correct. 23 Q. These stamps on Page 6 of your 24 declaration also don't indicate how the 25 Networks-on-Chip book was found by any person that
Page 22 1 first due date stamped on Page 6 is August 27, 2 2003, correct? 3 A. That is correct. 4 Q. And then the first return date stamped on 5 Page 6 is January 8, 2004, correct? 6 A. Meaning -- oh, yes, that is correct. 7 That is what I see. 8 Q. So according to the first due date and 9 first return date stamped on Page 6, the 10 Networks-on-Chip book was first checked out 11 sometime before August 27, 2003, and then returned 12 on January 8, 2004, correct? 13 MR. KOHLHEPP: Object to form. 14 THE WITNESS: I can't state whether that 15 is correct or not. It is a human stamping. 16 BY MR. HOLT: 17 Q. So based on the stamps shown on Page 6, 18 those stamps indicate that the Networks-on-Chip 19 book was checked out from sometime before 20 August 27, 2003 until January 8, 2004, correct? 21 A. Based on the stamps, that is what it 22 appears, yes. 23 Q. And if this Networks-on-Chip book was 24 checked out from August 27, 2003 until January 8, 25 2004 as indicated by the stamps on Page 6, then	Page 24 1 checked out the book, correct? 2 MR. KOHLHEPP: Object to form. 3 THE WITNESS: I am not understanding the 4 question. 5 BY MR. HOLT: 6 Q. I will try to restate. The stamps 7 recorded on -- strike that. 8 The stamps shown on Page 6 of your 9 declaration do not indicate how any person that 10 checked out the book Networks-on-Chip located or 11 found that book in UT Libraries, correct? 12 A. That is correct. 13 MR. KOHLHEPP: Object to form. 14 BY MR. HOLT: 15 Q. Let's go to Paragraph 8 of your 16 declaration. Are you there, Mr. O'Bryan? 17 A. Yes, I am. 18 Q. Okay. Thanks. 19 So Paragraph 8 says, "I have reviewed the 20 portions of Networks-on-Chip attached as Exhibit B 21 and they reflect an accurate copy of the 22 corresponding portions of the item as it exists in 23 the UT Libraries"; is that right? 24 A. That is correct. 25 Q. So you reviewed the pages of the

Page 25 1 Networks-on-Chip book shown in Exhibit B, correct? 2 A. That is correct. 3 Q. And you compared those pages in your 4 Exhibit B to the actual book held by UT Libraries, 5 correct? 6 A. Correct. 7 Q. So looking at Exhibit B in your 8 declaration, Exhibit B does not include all pages 9 of the Networks-on-Chip book, correct? 10 A. That is correct. 11 Q. And Exhibit B of your declaration does 12 not include, specifically, Pages 61 through 84 of 13 the Networks-on-Chip book, correct? 14 A. That is correct. 15 Q. So based on your statement in Paragraph 8 16 of your declaration and what is shown in Exhibit B, 17 you did not review Pages 61 through 84 of the 18 Networks-on-Chip book held in UT Libraries, 19 correct? 20 MR. KOHLHEPP: Object to form. 21 THE WITNESS: Can you repeat the question, 22 please? 23 BY MR. HOLT: 24 Q. Yes. 25 So based on your statement in Paragraph 8	Page 27 1 MR. ROSEN: Okay. 2 MR. HOLT: Just wanted to double-check, 3 but, yes, confirmed. 4 MR. ROSEN: Okay. 5 MR. HOLT: Counsel, just to be clear, is 6 that an objection? 7 MR. ROSEN: No. I just wanted to make 8 sure we were looking at the same thing. 9 BY MR. HOLT: 10 Q. Mr. O'Bryan, you said that you don't 11 recognize this document, Exhibit 1007, correct? 12 A. That is correct. 13 Q. Mr. O'Bryan, I want to ask about your 14 declaration. Who asked you to prepare this 15 declaration? 16 MR. ROSEN: Just for clarification, should 17 I close out this document? 18 MR. HOLT: Yes. 19 MR. ROSEN: The exhibit? 20 Okay. 21 MR. HOLT: Yes. There we go. 22 MR. ROSEN: Can you read that last 23 question back, Madam Reporter? 24 MR. HOLT: Yes, of course. 25 ///
Page 26 1 of your declaration and the pages of the 2 Networks-on-Chip book shown in Exhibit B, you did 3 not review Pages 61 through 84 of the 4 Networks-on-Chip book held in UT Libraries; is that 5 correct? 6 A. That is correct. 7 (Exhibit 1007 was marked for 8 identification.) 9 BY MR. HOLT: 10 Q. So I am now providing a document in the 11 Zoom chat that has been premarked as Exhibit 1007. 12 Can you let me know when you get that. 13 MR. ROSEN: I have to save it first and 14 then pull it up through Adobe Acrobat. 15 THE WITNESS: Okay. Got it. 16 BY MR. HOLT: 17 Q. Mr. O'Bryan, do you recognize this 18 document? 19 A. Nope. 20 MR. ROSEN: So the record is clear, the 21 first page of the document reads, "Chapter 4. 22 Guaranteeing the quality of services and 23 Networks-on-Chip"? Is that accurate? Did we lose 24 people? 25 MR. HOLT: Yes.	Page 28 1 BY MR. HOLT: 2 Q. Mr. O'Bryan, who asked you to prepare 3 your declaration? 4 A. I get contacted from our open records 5 office with information that says what they are 6 interested in confirming as a catalog date of an 7 item. I am given the title, the call number 8 sometimes. And then I am asked to produce scans of 9 certain parts of the book. 10 Q. Did you ever have conversations with any 11 attorneys regarding preparing your declaration? 12 A. No. 13 Q. About how long did you spend on preparing 14 this declaration? 15 A. I can't recall. Maybe approximately an 16 hour or so. 17 Q. And did you do any investigation in 18 association with preparing this declaration? 19 MR. KOHLHEPP: Object to form. 20 THE WITNESS: The investigation I do is to 21 examine the data and to find the cataloging date 22 that I am asked to provide, and I provide it, and I 23 provide a scan, and I provide the scans I am asked 24 for from the piece. 25 ///

Page 29 1 BY MR. HOLT: 2 Q. About how long did that investigation 3 take in preparing this declaration? 4 A. I don't recall. I mean, I stated the 5 time, I think, in the request form, but I would 6 say, speculate I don't know, an hour or two, 7 something like that to put it all together. 8 Q. Understood. 9 And did you do anything to prepare for 10 today's deposition? 11 A. Just meeting with my counsel. 12 Q. And specifically who did you meet with? 13 A. Steven Rosen right here. 14 Q. Did you meet with anyone else in 15 preparing for today's deposition? 16 A. No. 17 Q. Looking back at your declaration, and 18 specifically Paragraph 5, it refers to the 19 Networks-on-Chip book held by UT Libraries, 20 correct? 21 A. That is correct. 22 Q. This Paragraph 5 does not indicate 23 whether the Networks-on-Chip book held by UT 24 Libraries is the hardcover or softcover version; is 25 that right?	Page 31 1 MR. KOHLHEPP: No questions from 2 petitioner at this time. Thanks. 3 MR. HOLT: Thanks. Let's go off the 4 record. 5 MR. KOHLHEPP: Whatever is standard is 6 fine. 7 (The remote deposition of SEAN O'BRYAN 8 concluded at 12:57 p.m. PST)
Page 30 1 A. Paragraph 5 does not indicate that, that 2 is correct. 3 Q. The Networks-on-Chip book is also 4 mentioned in Paragraphs 6, 7, and 8 of your 5 declaration, correct? 6 A. Correct. 7 Q. And those Paragraphs 6, 7, and 8 of your 8 declaration also do not indicate whether it is the 9 hardcover or softcover version of the 10 Networks-on-Chip book that is held by UT Libraries, 11 correct? 12 A. Those paragraphs don't indicate that, 13 that is correct. 14 Q. So your declaration as a whole does not 15 include an indication as to whether the 16 Networks-on-Chip book held by UT Libraries is a 17 hardcover or softcover version, right? 18 A. I believe that is correct. I am not sure 19 what the ISBN is indicated in the MARC record for 20 it, but there is no statement saying so. 21 MR. HOLT: Let's go off the record. 22 (Recess taken.) 23 MR. HOLT: Thank you, Mr. O'Bryan. The 24 patent owner has no further questions on cross and 25 passes the witness.	Page 32 1 I, Patricia Y. Schuler, a Certified 2 Shorthand Reporter of the State of California, do 3 hereby certify: 4 That the foregoing proceedings were taken 5 before me at the time and place herein set forth; 6 that any witnesses in the foregoing proceedings, 7 prior to testifying, were duly sworn; that a 8 verbatim record of the proceedings was made by me 9 using machine shorthand which was thereafter 10 transcribed under my direction; that the foregoing 11 transcript is a true record of the testimony given. 12 Further, that if the foregoing pertains 13 to the original transcript of a deposition in a 14 Federal Case, before completion of the proceedings, 15 review of the transcript [X] was [] was not 16 requested. 17 I further certify I am neither 18 financially interested in the action nor a relative 19 or employee of any attorney or party to this 20 action. 21 IN WITNESS WHEREOF, I have this date 22 subscribed my name. 23 Dated: November 15, 2024 24  25 PATRICIA Y. SCHULER CSR NO. 11949

Page 33

1 DECLARATION UNDER PENALTY OF PERJURY

2 Case Name: Qualcomm vs. Network System Technologies

3 Date of Deposition: 11/15/2024

4 Job No.: 10153245

5

6 I, SEAN O'BRYAN, hereby certify

7 under penalty of perjury under the laws of the State of

8 _____ that the foregoing is true and correct.

9 Executed this _____ day of

10 _____, 2024, at _____.

11

12

13 _____

14 SEAN O'BRYAN

15

16 NOTARIZATION (If Required)

17 State of _____

18 County of _____

19 Subscribed and sworn to (or affirmed) before me on

20 this _____ day of _____, 20____,

21 by _____, proved to me on the

22 basis of satisfactory evidence to be the person

23 who appeared before me.

24 Signature: _____ (Seal)

25

Page 34

1 DEPOSITION ERRATA SHEET

2 Case Name: Qualcomm vs. Network System Technologies

3 Name of Witness: Sean O'Bryan

4 Date of Deposition: 11/15/2024

5 Job No.: 10153245

6 Reason Codes: 1. To clarify the record.

7 2. To conform to the facts.

8 3. To correct transcription errors.

9

10 Page _____ Line _____ Reason _____

11 From _____ to _____

12 Page _____ Line _____ Reason _____

13 From _____ to _____

14 Page _____ Line _____ Reason _____

15 From _____ to _____

16 Page _____ Line _____ Reason _____

17 From _____ to _____

18 Page _____ Line _____ Reason _____

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22 _____ Subject to the above changes, I certify that the

23 transcript is true and correct

24 _____ No changes have been made. I certify that the

25 transcript is true and correct.

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