

Deposition of
Gordon MacPherson
September 20, 2024

Qualcomm
vs.
Network System Technologies



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Network System Technologies Ex. 2080
Qualcomm v. Network System Technologies - IPR 2024-00338

Page 1 1 UNITED STATES PATENT AND TRADEMARK OFFICE 2 BEFORE THE PATENT TRIAL AND APPEAL BOARD 3 QUALCOMM INCORPORATED and 4 SAMSUNG ELECTRONICS CO., LTD., 5 Petitioners 6 v. 7 NETWORK SYSTEM TECHNOLOGIES, LLC 8 Patent Owner 9 10 U.S. Patent No. 7,594,052 11 Inter Partes Review No. IPR2024-00343 12 13 REMOTE DEPOSITION OF 14 15 GORDON MACPHERSON 16 17 18 19 Friday, September 20, 2024 20 21 22 23 REPORTED BY: 24 ANGELA KOTT, CSR 7811 25 JOB NO: 10149777	Page 3 1 R E M O T E A P P E A R A N C E S 2 FOR PETITIONERS: 3 CARLSON CASPERS VANDENBURGH & LINDQUIST, 4 P.A. 5 BY: PETER KOHLHEPP, ESQUIRE 6 225 South Sixth Street, Suite 4200 7 Minneapolis, MN 55402 8 612.436.9600 9 pkohlhepp@carlsoncaspers.com 10 11 FOR PATENT OWNER: 12 13 NIXON PEABODY LLP 14 BY: PETER KRUSIEWICZ, ESQUIRE 15 BY: ANGELO CHRISTOPHER, ESQUIRE 16 70 West Madison Street, Suite 5200 17 Chicago, Illinois 60602 18 pkrusiewicz@nixonpeabody.com 19 achristopher@nixonpeabody.com 20 21 FOR THE DEPONENT: 22 DORSEY & WHITNEY 23 BY: ALYSSA SCHAEFER, ESQUIRE 24 50 South Sixth Street, Suite 1500 25 Minneapolis, Minnesota 55402 612.492.6987 Schaefer.alyssa@dorsey.com ALSO PRESENT: CHRIS LANDRUM, Aptus Technical Monitor ---oOo---
Page 2 1 UNITED STATES PATENT AND TRADEMARK OFFICE 2 BEFORE THE PATENT TRIAL AND APPEAL BOARD 3 QUALCOMM INCORPORATED and 4 SAMSUNG ELECTRONICS CO., LTD., 5 Petitioners 6 v. 7 NETWORK SYSTEM TECHNOLOGIES, LLC 8 Patent Owner 9 10 U.S. Patent No. 7,594,052 11 Inter Partes Review No. IPR2024-00343 12 13 14 BE IT REMEMBERED THAT, pursuant to Notice 15 of Taking Deposition, and on Friday, 16 September 20, 2024, commencing at the hour of 11:00 17 a.m., Pacific, thereof, before me, ANGELA KOTT, a 18 Certified Shorthand Reporter, there remotely 19 appeared 20 GORDON MACPHERSON, 21 called as a witness by the Patent Owner, who, being 22 by me first duly sworn, was thereupon examined and 23 interrogated as is hereinafter set forth. 24 ---oOo--- 25	Page 4 1 I N D E X 2 INDEX OF EXAMINATIONS 3 EXAMINATION BY MR. CHRISTOPHER..... 5 4 5 EXHIBITS MARKED FOR IDENTIFICATION 6 Exhibit No. Description Page 7 Exhibit 1018 Declaration of Gordon 8 8 MacPherson 9 (Previously marked exhibit) 10 Exhibit 2064 Website capture of IEEE 17 11 article from 9/20/2024 12 Exhibit 2065 Website capture of IEEE Terms 23 13 & Disclosures from 9/20/2024 14 Exhibit 2066 Subpoena to Testify at a 7 15 Deposition in a Civil Action 16 to Gordon MacPherson 17 18 (Exhibits not attached) 19 20 21 22 23 24 25

1 PROCEEDINGS 2 3 GORDON MACPHERSON, 4 having been first duly sworn, 5 was examined and testified as follows: 6 7 THE REPORTER: Thank you. Please begin. 8 9 EXAMINATION 10 BY MR. CHRISTOPHER: 11 Q. Good afternoon. Could you please state 12 your name for the record. 13 A. Gordon MacPherson. 14 Q. Thank you. Nice to meet you. 15 Any reason you can't give complete, 16 truthful and accurate testimony today, 17 Mr. MacPherson? 18 A. No. 19 Q. Have you been deposed before? 20 A. Yes, I have. 21 Q. And approximately how many times have you 22 been deposed? 23 A. Ten or 15 times, maybe. 24 Q. Okay. So I suspect you're familiar with 25 the ground rules. Counsel might object from time to	Page 5 1 for any of your discussions. 2 Did you meet with any attorneys in 3 preparation for the deposition? 4 A. No. No. 5 MR. CHRISTOPHER: Okay. All right. I'm 6 going to introduce Exhibit -- this will be 2066, a 7 new exhibit in the proceeding. It will come through 8 the Zoom chat. If you could open that up, that 9 would be great. 10 (Whereupon, Exhibit 2066 was marked for 11 identification) 12 THE WITNESS: I can see it. 13 BY MR. CHRISTOPHER: 14 Q. Great. I'll represent to you that 15 Exhibit 2066 is a copy of a subpoena issued by the 16 Clerk of Court for the United District Court for the 17 District of Delaware. 18 Do you understand you're here to testify 19 about a declaration you authored that was submitted 20 in a Patent Office proceeding? 21 A. Yes. 22 MR. CHRISTOPHER: Great. I'm now going to 23 put in the chat a copy of Exhibit 1018. 24 Please let me know when you have that 25 available to you.
Page 6 1 time. Please pause to give them a chance. It's 2 important that they can object. 3 But unless they instruct you not to answer 4 the question -- which I don't think will come up 5 today -- you should answer the question. 6 Does that make sense? 7 A. Yes. 8 Q. And today's deposition should be pretty 9 short, but you're not a prisoner. If you need a 10 break, let me know. Happy to accommodate. Okay? 11 A. Thank you. 12 Q. All right. And if at any time you don't 13 understand my questions, please ask me to clarify 14 and I'll be happy to do so. 15 A. Okay. 16 Q. Great. Where are you physically located 17 for today's deposition, sir? 18 A. Lewes, Delaware. 19 Q. Great. Did you do anything to prepare for 20 today's deposition? 21 A. I looked at the materials for -- I think it 22 was -- I think it was maybe -- it was a number of 23 months ago that I first was made aware of the issue 24 around this article. 25 Q. Okay. Did you meet -- and I'm not asking	Page 7 1 (Whereupon, Exhibit 1018 was previously 2 marked for identification) 3 THE WITNESS: I can see it. 4 BY MR. CHRISTOPHER: 5 Q. Great. Do you recognize Exhibit 1018 as a 6 copy of the declaration you authored on or around 7 October 30th, 2023? 8 A. Yes. 9 Q. All right. And if you could scroll to 10 page 2 for me, please. 11 A. Okay. 12 Q. Is that your signature or DocuSign 13 signature on page 2? 14 A. Yes, it is. 15 Q. Great. Let's turn to paragraph 1 of your 16 declaration, please. 17 Are you there? 18 A. I'm sorry. Say that again, please. 19 Q. Could you turn to paragraph 1, which is on 20 page 1, please. 21 A. Yes, I have it. 22 Q. Okay. So you are currently the Director, 23 Board of Governance and Policy Development at IEEE, 24 correct? 25 A. That's correct.

Page 9 1 Q. Okay. How long have you been in that role 2 at IEEE? 3 A. Out of 17 years, I've been doing this for 4 about eight years. 5 Q. Okay. And you predicted my next question. 6 How long have you been employed by IEEE? 7 A. It will be 17 years in November. 8 Q. Help me out with the math. You started in 9 2007. 10 Is that right? 11 A. November of 2007, that's right. 12 Q. Great. Thank you. I want to ask you some 13 general questions about IEEE Xplore. 14 If you could turn to paragraph 6 of your 15 declaration, please. 16 A. Yes. I have it in front of me. 17 Q. In paragraph 6 you wrote, "As part of its 18 ordinary course of business, IEEE publishes and 19 makes available technical articles and standards. 20 These publications are made available for public 21 download through the IEEE digital library, IEEE 22 Xplore." 23 Do you see that? 24 A. Yes. 25 Q. And when you refer to downloading the	Page 11 1 the public through IEEE Xplore, correct? 2 A. Yes. That's right. 3 Q. And you don't need to make a purchase or 4 have an account to view the abstract, right? 5 A. That's right. You can see the abstract. 6 Q. But you would have to make a purchase or 7 have a subscription to be able to see the full text 8 article, right? 9 A. Yes. That's right. 10 Q. Great. All right. Moving along. 11 Paragraph 8, if you could turn there for 12 me, please. 13 A. Yes, I have it. 14 Q. All right. In paragraph 8 you wrote, "The 15 article below has been attached as Exhibit A to this 16 declaration." 17 It says, "A. Radulescu, et al.; 'An 18 efficient on-chip network interface offering 19 guaranteed services, shared-memory abstraction, and 20 flexible network configuration.'" 21 Do you see that? 22 A. Yes. That's correct. 23 Q. Okay. And is it okay with you if we call 24 that the Radulescu article today for short? 25 A. Yes.
Page 10 1 publications from IEEE Xplore, were you referring to 2 the full text version of the article? 3 A. Yes. It's in the form of a PDF. You can 4 download a single article. 5 Q. And so to download a full text article from 6 IEEE Xplore, you would need either to pay for the 7 article or have an IEEE subscription. 8 Is that right? 9 A. Yes. That's right. 10 Q. Was that also the case for IEEE Xplore in 11 or around 2004? 12 A. Yes, it was. 13 Q. And then if you could turn to paragraph 7, 14 please. 15 A. Yes, I have it. 16 Q. All right. In paragraph 7 you wrote, "It 17 is the regular practice of IEEE to publish articles 18 and other writings including article abstracts and 19 make them available to the public through IEEE 20 Xplore." 21 Do you see that? 22 A. Yes. 23 Q. And I just want to understand the general 24 process here. 25 The article abstract will be available to	Page 12 1 Q. Great. All right. 2 In paragraph 9, you discuss the copy of the 3 Radulescu article in paragraph A. The copy in 4 paragraph A is a copy as it existed on IEEE Xplore 5 on October 30th, 2023, correct? 6 A. Yes. That's right. 7 Q. Okay. And then if you could turn for me to 8 paragraph 10. 9 A. Yes. I have it. 10 Q. Okay. In the first sentence of 11 paragraph 10 you wrote, "The article and abstract 12 from IEEE Xplore shows the date of publication." 13 Do you see that? 14 A. Yes. 15 Q. What is the date of publication in 16 Exhibit A that you're referring to here in 17 paragraph 10? 18 A. We recognize the date of publication of a 19 conference paper as the date that the conference 20 opened -- that's our business rule -- for the 21 publication date of an article from a conference 22 proceedings. 23 Q. Okay. And in this case, what would be the 24 publication date for the Radulescu article? 25 A. February 16th, 2004.

Page 13 1 Q. And then if you could turn back to 2 paragraph 10 again for me. In the second sentence 3 you wrote, "IEEE Xplore populates this information 4 using the metadata associated with the publication." 5 A. Yes. That's correct. 6 Q. Okay. And I want to talk about the 7 metadata. 8 What is the metadata you're referring to 9 here in paragraph 10 of your declaration? 10 A. Metadata is information about information. 11 So the key pieces of metadata for a 12 publication -- whether it's a journal or a 13 conference proceedings -- typically for a 14 conference. It would be the name of the conference, 15 the date it occurred. You could also include the 16 location, a number of other things. 17 And then that's the entire publication. 18 And we refer to that as a conference proceedings. 19 It's a record of all the research that was presented 20 at the conference. 21 Down to the article level, your metadata 22 would be more granular. The author's name, the 23 title of the paper, the affiliations of the author, 24 the abstract, keywords. Those are typically the 25 pieces of metadata you'd associate with an	Page 15 1 The metadata comes from the conference 2 organizers. 3 Is that correct? 4 A. That's correct. 5 Q. And does IEEE -- strike that. 6 The metadata isn't created by IEEE 7 employees insofar as they are not a conference 8 organizer. 9 Is that right? 10 A. That's correct. 11 Q. Does IEEE ever edit or alter the metadata 12 that's received from the conference organizers? 13 A. If there are errors, for instance, if we're 14 contacted by the conference organizer and alerted to 15 an error, we can correct the error. 16 Q. Are there any instances in which IEEE would 17 edit or alter the metadata outside of a direct 18 request from the organizers? 19 A. It's unlikely. I can't say that it's ever 20 happened, and I don't -- wouldn't know the reason 21 specifically. But it's unlikely for that to have 22 happened, unless there was a very good reason for 23 it. 24 And the good reason would generally be 25 correcting a mistake that someone pointed out.
Page 14 1 individual article. 2 Q. Can you describe for me how the metadata 3 would be created for an article? 4 A. There's a device called the packing list 5 generator that's used by IEEE conferences. It's 6 sort of a -- well, we call it a packing list because 7 it accompanies the content. 8 After the conference closes, the organizer 9 of the conference or the publication chair of the 10 conference will deliver it to IEEE. In these days, 11 there's typically a CD-ROM. It might be a printed 12 book. 13 But they would deliver the -- they would 14 deliver the proceedings to us, and this packing list 15 would include the key metadata. And it accompanies 16 the bundle of PDFs which we would end up loading 17 onto Xplore and displaying as the conference 18 proceedings. 19 So through that device, we collect the 20 metadata from the conference itself. The conference 21 organizer provides that metadata at the publication 22 level. And we then in turn apply that publication 23 date for the entire conference to each individual 24 article. 25 Q. See if I -- make sure I understand you.	Page 16 1 Q. And so in the case of the Radulescu article 2 in your declaration, the underlying metadata would 3 have come from the conference organizers. 4 Is that correct? 5 A. Yes. That's right. 6 Q. And does IEEE do anything to independently 7 verify the accuracy of that metadata? 8 A. At the time of this conference, it predates 9 my time at IEEE by a few years. 10 However, I can -- I can say that I'm aware 11 of spot checks that were instituted a number of 12 years after this. I don't know if those spot checks 13 or something like them were in place at this time 14 where there would be a second check as to the 15 accuracy of the conference start date that was 16 recorded by the conference organizer. 17 Q. So would it be fair to say that you're 18 unsure whether IEEE would do any verification of the 19 metadata in 2004? 20 A. That's right. 21 MR. KOHLHEPP: Object to form. 22 BY MR. CHRISTOPHER: 23 Q. Thank you. All right. If we could turn 24 now to Exhibit A of your declaration. 25 A. I have it.

Page 17 1 Q. All right. And I want to focus on the 2 first page. 3 Do you see where the articles are listed -- 4 or the articles -- the authors are listed, starting 5 with A. Radulescu? 6 A. Yes. 7 Q. And then underneath that, a little bit to 8 the right, do you see where it says, "419, Full Text 9 Views"? 10 A. Yes. 11 Q. Okay. Am I correct that this is indicating 12 how many times the full text version of Radulescu 13 has been viewed on IEEE Xplore? 14 A. Yes. As of the day that this was 15 downloaded, yes. 16 Q. You got my next question. 17 Do you know what timeframe that statistic 18 encompasses, going backwards from October 2023? 19 A. I believe that that would be going back to 20 the day that it was uploaded to IEEE Xplore. And 21 that was March 8th, 2004. 22 MR. CHRISTOPHER: So let's -- this will be 23 Exhibit 2064. Let me know when you have that open. 24 (Whereupon, Exhibit 2064 was marked for 25 identification)	Page 19 1 BY MR. CHRISTOPHER: 2 Q. Mr. MacPherson, could you turn to page 2 3 for me. 4 A. Yes, I have it. It's -- the word 5 "Contents" is near the top? 6 Q. Yes. And then about halfway down do you 7 see where it says, "Metrics"? 8 A. Yes. 9 Q. And then there's kind of a bar graph on the 10 bottom of the page? 11 Do you see that? 12 A. Yes. 13 Q. And above the bar graph it says, "Total 14 usage since January 2011: 454"? 15 Do you see that? 16 A. You said January 2011. Okay. "Since 17 January 2011: 454." 18 Q. Okay. And the metrics here on 19 Exhibit 2064, according to those metrics, all of the 20 454 full text views occurred between 2011 and 2024, 21 correct? 22 MR. KOHLHEPP: Objection again to form. 23 Scope. 24 THE WITNESS: Can you repeat the question, 25 please?
Page 18 1 MR. CHRISTOPHER: Still loading, or do you 2 have it open? 3 THE WITNESS: I'm sorry. Say that again. 4 BY MR. CHRISTOPHER: 5 Q. Is it still loading, or do you have the new 6 Exhibit 2064 open? 7 A. Oh, did you put another one into chat? 8 Q. Yeah, I put another one in. I know it's 9 awkward doing it this way. 10 A. Okay. I have it in front of me. 11 Q. All right. I will represent to you that 12 this is a copy of the same Radulescu article page on 13 IEEE Xplore that I captured today. 14 And do you see at the top it says, "454, 15 Full Text Views"? 16 Do you see that? 17 A. Yes. 18 Q. Okay. 19 MR. KOHLHEPP: Counsel, I'm going to 20 interject here and just lodge an objection based on 21 scope for the record to both this exhibit and also 22 to the line of questioning regarding it. 23 MR. CHRISTOPHER: Okay. We disagree, but 24 let's continue. 25 ///	Page 20 1 BY MR. CHRISTOPHER: 2 Q. Sure. According to the metrics in 3 Exhibit 2064, all of the 454 full text views 4 occurred between 2011 and 2024, correct? 5 A. That's what -- it would appear so, based on 6 my understanding. 7 Q. Thank you. Let's turn back to your 8 declaration Exhibit 1018 and turn to paragraph 11, 9 please. 10 A. Okay. I have it. 11 Q. All right. In the first sentence of 12 paragraph 11 you state, "A. Radulescu, et al.; 'An 13 efficient on-chip network interface offering 14 guaranteed services, shared-memory abstraction, and 15 flexible network configuration' published in 16 Proceedings Design, Automation and Test in Europe 17 Conference and Exhibition, date of conference 18 February 16-20, 2004." 19 Do you see that? 20 A. Yes. 21 Q. And your statement in the first sentence of 22 paragraph 11 is based on the metadata we discussed 23 earlier, correct? 24 A. Yes. That's right. 25 Q. You don't have any personal knowledge

Page 21 1 regarding the conference in February 2004, right? 2 A. No, I don't. 3 Q. You didn't go to the conference, right? 4 A. No. 5 Q. And then in the second sentence -- let me 6 back up. 7 In the course of preparing your 8 declaration, did you talk to anybody who went to the 9 conference in February 2004? 10 A. No. I did not. 11 Q. Okay. And then in the second sentence of 12 paragraph 11 you wrote, "Copies of the conference 13 proceedings were made available no later than the 14 last day of the conference." 15 Do you see that? 16 A. That's right. 17 Q. Okay. What is the basis for your statement 18 that copies were made available no later than the 19 last day of the conference? 20 A. It's my understanding of our typical 21 business practices in that era. 22 So during the -- the early 2000s -- that a 23 CD-ROM or a book would in most cases be handed to 24 attendees when they showed up at the conference and 25 went to the registration desk. You were handed --	Page 23 1 you can open up Exhibit 2065. Let me know when you 2 have that available. 3 (Whereupon, Exhibit 2065 was marked for 4 identification) 5 THE WITNESS: Okay. I have it open. 6 BY MR. CHRISTOPHER: 7 Q. All right. And I'll represent to you that 8 Exhibit 2065 is -- 9 MR. KOHLHEPP: Hold on. Hold on. Hold on 10 a minute here. Let me get it open as well. Sorry. 11 I'm slower than you all. One minute. 12 MR. CHRISTOPHER: It's okay. 13 MR. KOHLHEPP: There we go. Okay. It's 14 open. 15 BY MR. CHRISTOPHER: 16 Q. Great. All right. Mr. MacPherson, I'm 17 representing that Exhibit 2065 is a copy of the IEEE 18 terms of service that I downloaded from the URL 19 that's listed in the footnote. 20 I want to ask you, on the first page at the 21 top, do you see where it says, "Terms & Disclosures 22 for Use of IEEE Websites"? 23 A. Yes, I see it. 24 Q. All right. Now if you can turn to page 3 25 for me, please.
Page 22 1 you're generally handed a copy of the proceedings. 2 In a rare case, some conference organizers 3 might hold on to it until the end, but that's -- 4 it's a possibility, but it's extremely rare and 5 unlikely. But it is possible. 6 That's why we say that no later than the 7 last day of the conference. But generally speaking, 8 the first day of the conference is when you would 9 acquire a copy of the proceedings. 10 Q. So would it be fair to say that your 11 statement here in paragraph 11 is based on your 12 knowledge and experience with IEEE as opposed to any 13 personal knowledge of this particular conference? 14 Is that correct? 15 A. Yes. That's correct. 16 Q. Thank you. And do you happen to know 17 whether the copies were made available in paper or 18 CD format at this particular conference? 19 A. I don't know. 20 Q. Introducing Exhibit 2064 in the chat. 21 Before you open that up, are you generally 22 aware that IEEE has terms of service for its 23 website? 24 A. I am generally aware of that, yes. 25 MR. CHRISTOPHER: All right. And now if	Page 24 1 A. I have it. 2 Q. All right. Do you see where in bold it 3 says, "(B) Disclaimer of Accuracy"? 4 A. Yes. 5 Q. All right. And the first sentence reads, 6 "IEEE does not represent or warrant that the 7 information accessible via these sites is accurate, 8 complete or current." 9 Did I read that correctly? 10 A. Yes. 11 Q. And then the second sentence reads, "These 12 sites could contain typographical errors, 13 miscatalogued information, or technical 14 inaccuracies." 15 Did I read that right? 16 A. Yes. 17 Q. Would you agree that it is possible for 18 information to be miscatalogued on IEEE Xplore? 19 MR. KOHLHEPP: I'm going on object to form, 20 scope, the document Exhibit 2065 and the questions 21 regarding it. 22 THE WITNESS: The answer is that I believe 23 it is possible. 24 BY MR. CHRISTOPHER: 25 Q. I'm going to skip ahead a couple sentences

Page 25 1 to the sentence that starts with the word "By..." 2 Do you see that line, so we're reading the 3 same line? 4 A. Yes, "By your use..."? 5 Q. Yeah. So that sentence reads, "By your use 6 of these sites, you agree that you do not and will 7 not rely on it being appropriately catalogued or 8 complete for any purpose, including but not limited 9 to patentability of any invention, invalidity of any 10 claim of any patent or application, or authorship 11 and inventorship of any article, patent or 12 application." 13 Did I read that correctly? 14 A. Yes. 15 Q. All right. So to recap, the statements in 16 your declaration regarding the Radulescu article are 17 based on the information in IEEE's records, correct? 18 A. Yes. 19 Q. And in your declaration, you have 20 accurately described the information as it appears 21 in IEEE's records, correct? 22 A. Yes. 23 Q. But would it be fair to say that you cannot 24 attest to whether the underlying information, 25 including the metadata, is accurate?	Page 27 1 A. It comes from -- I think for the last year 2 or so, it comes from a paralegal in IEEE's legal 3 department. 4 Q. So is it correct that you don't have any 5 direct communications with whatever third party is 6 requesting the declaration? 7 A. That's correct. I only -- I only deal with 8 IEEE's legal department. Unless I have some 9 communication with our outside counsel, which it 10 generally is logistical. When I have to show up, 11 what I need to talk about. 12 MR. CHRISTOPHER: I think I'm about done. 13 If we can go off the record for about two minutes. 14 I'm going to double-check my notes, and hopefully we 15 can get out of here. 16 (Recess taken 11:27 a.m. - 11:29 a.m.) 17 MR. CHRISTOPHER: All right. 18 Mr. MacPherson, I want to thank you very 19 much for your time today on behalf of our clients 20 for answering our questions. I don't have anything 21 further. 22 I think I have something like 30 minutes 23 left, which I would reserve for any recross. But 24 with that, I'll pass the witness. 25 MR. KOHLHEPP: If we could take just a
Page 26 1 A. Yes. 2 I'm sorry. Can you just repeat the 3 question? I want to make sure I answered you the 4 right way. 5 Q. Yeah, absolutely. 6 I asked, would it be fair to say that you 7 cannot attest to whether the underlying information, 8 including the metadata, which was received from the 9 conference organizers, is accurate? 10 A. Yes. 11 Q. I just have a few more questions and we can 12 be done. 13 How long did you spend preparing your 14 declaration, approximately? 15 A. Generally I spend ten or 15 minutes. I 16 read through it. I download the article and I try 17 to pick up the key information and then file it 18 away. 19 Often, I'm not asked to take any other 20 actions after the -- after attesting to what I've 21 seen. 22 Q. Got it. And I don't want to ask you for 23 the substance of any communications you may or may 24 not have had with any lawyers, but can you tell us 25 who asked you to prepare the declaration?	Page 28 1 quick five-minute break. Go off the record. 2 MR. CHRISTOPHER: Okay. 3 (Recess taken 11:30 a.m. - 11:37 a.m.) 4 MR. KOHLHEPP: Mr. MacPherson, I want to 5 also thank you for your time today on behalf of our 6 client, Qualcomm. I have no questions. 7 THE REPORTER: Are we done? 8 MR. CHRISTOPHER: We're done. Unless 9 counsel for Mr. MacPherson has anything? 10 MS. SCHAEFER: I do not. 11 MR. CHRISTOPHER: Then we're done. 12 THE REPORTER: Could I get copy orders, 13 please? 14 MR. CHRISTOPHER: So I think you have our 15 order. I think we asked for the transcript, because 16 we have a deadline the 25th. And I think we also 17 asked for a rough. But I think I can download it. 18 THE REPORTER: I'll e-mail you. 19 MR. CHRISTOPHER: If you can e-mail me a 20 rough, that would be great, because I think you have 21 our order at this point for the transcript. 22 THE REPORTER: Okay. Mr. Kohlhepp? 23 MR. KOHLHEPP: Nothing from us at this 24 time. 25 THE REPORTER: And Ms. Schaefer?

Page 29	Page 31
1 MR. KOHLHEPP: Nothing from us at this 2 time. 3 4 (Whereupon, the deposition was 5 adjourned at 11:38 a.m.) 6 7 8 --oOo-- 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	1 DECLARATION UNDER PENALTY OF PERJURY 2 Case Name: Qualcomm vs. Network System Technologies 3 Date of Deposition: 09/20/2024 4 Job No.: 10149777 5 6 I, GORDON MACPHERSON, 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 GORDON MACPHERSON 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
1 CERTIFICATE OF REPORTER 2 I, ANGELA T. KOTT, a Certified Shorthand 3 Reporter, hereby certify that the witness in the 4 foregoing deposition was by me duly sworn to tell 5 the truth, the whole truth and nothing but the truth 6 in the within-entitled cause; 7 That said deposition was taken down in 8 shorthand by me, a disinterested person, at the time 9 and place therein stated, and that the testimony of 10 the said witness was thereafter reduced to 11 typewriting, by computer, under my direction and 12 supervision; 13 I further certify that I am not of counsel 14 or attorney for either or any of the parties to the 15 said deposition, nor in any way interested in the 16 event of this cause, and that I am not related to 17 any of the parties thereto. 18 19 DATED: September 23, 2024. 20 21  22 ANGELA T. KOTT, CSR 7811 23 24 25	1 DEPOSITION ERRATA SHEET 2 Case Name: Qualcomm vs. Network System Technologies 3 Name of Witness: Gordon MacPherson 4 Date of Deposition: 09/20/2024 5 Job No.: 10149777 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 _____ 19 From _____ to _____ 20 Page _____ Line _____ Reason _____ 21 From _____ to _____ 22 Page _____ Line _____ Reason _____ 23 From _____ to _____ 24 Page _____ Line _____ Reason _____ 25 From _____ to _____

1 DEPOSITION ERRATA SHEET

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14 Page ____ Line ____ Reason ____

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16 Page ____ Line ____ Reason ____

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20 Page ____ Line ____ Reason ____

21 From ____ to ____

22 ____ Subject to the above changes, I certify that the
transcript is true and correct

23 ____ No changes have been made. I certify that the
transcript is true and correct.

24

25 _____
GORDON MACPHERSON

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(B) 24:3	2007 9:9,11	6 9:14,17	accuracy 16:7,15 24:3
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--ooo-- 29:8	2024 2:16 19:20 20:4	7	achristopher@ nixonpeabody.com 3:11
1	2064 4:9 17:23,24 18:6 19:19 20:3 22:20	7 4:12 10:13,16	acquire 22:9
1 8:15,19,20	2065 4:10 23:1,3,8,17 24:20	7,594,052 2:10	Action 4:12
10 12:8,11,17 13:2,9	2066 4:12 7:6,10,15	70 3:10	actions 26:20
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