

Deposition of
Nikil Dutt, Ph.D.
August 27, 2024

Qualcomm
vs.
Network System Technologies [IPR2024-00343]



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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 and 5 SAMSUNG ELECTRONICS CO., LTD., 6 Petitioners 7 v. 8 NETWORK SYSTEM TECHNOLOGIES, LLC 9 Patent Owner 10 11 U.S. Patent No. 7,594,052 12 Inter Partes Review No. IPR2024-00343 13 14 15 16 DEPOSITION OF NIKIL DUTT, PH.D. 17 Reported Remotely through Videoconference 18 August 27, 2024 19 20 21 22 23 Reported by: 24 Margaret A. Smith 25 RPR, CRR, CSR No. 9733 Job No.: 10147599	Page 3 1 APPEARANCES (via videoconference): 2 3 For Petitioners: 4 CARLSON CASPERS VANDENBURGH & LINDQUIST, P.A. 5 BY: RYAN D. RYPKA, ESQUIRE 6 BY: PETER KOHLHEPP, ESQUIRE 7 225 South Sixth Street, Suite 4200 8 Minneapolis, MN 55402 9 612.436.9600 10 rrypka@carlsoncaspers.com 11 pkohlhepp@carlsoncaspers.com 12 13 For Patent Owner: 14 NIXON PEABODY LLP 15 BY: PETER KRUSIEWICZ, ESQUIRE 16 BY: ANGELO CHRISTOPHER, ESQUIRE 17 70 West Madison Street, Suite 5200 18 Chicago, Illinois 60602 19 pkrusiewicz@nixonpeabody.com 20 achristopher@nixonpeabody.com 21 22 Also present: 23 Chris Landrum, Aptus Court Reporting 24 25
Page 2 1 UNITED STATES PATENT AND TRADEMARK OFFICE 2 BEFORE THE PATENT TRIAL AND APPEAL BOARD 3 4 QUALCOMM INCORPORATED and 5 SAMSUNG ELECTRONICS CO., LTD., 6 Petitioners 7 v. 8 NETWORK SYSTEM TECHNOLOGIES, LLC 9 Patent Owner 10 11 U.S. Patent No. 7,594,052 12 Inter Partes Review No. IPR2024-00343 13 14 15 16 17 18 19 20 Deposition of NIKIL DUTT, PH.D. taken on behalf of 21 the Patent Owner, reported remotely through 22 videoconference, beginning at 1:13 p.m. EDT, and ending 23 at 4:28 p.m. EDT, on Tuesday, August 27, 2024, before 24 Margaret A. Smith, RPR, CRR, Certified Shorthand 25 Reporter No. 9733.	Page 4 1 I N D E X 2 3 WITNESS EXAMINATION 4 NIKIL DUTT, PH.D. 5 BY MR. KRUSIEWICZ 5 6 7 EXHIBITS 8 Patent Owner's PAGE 9 Exhibit 1005 - An Efficient On-Chip Network 45 10 Interface Offering Guaranteed 11 Services, Shared-Memory Abstraction, 12 and Flexible Network Configuration; 13 6 pages 14 Exhibit 1012 - Declaration of Nikil Dutt, Ph.D. 9 15 Under 37 C.F.R. S 1.68; 62 pages 16 Exhibit 1029 - Typographical Corrections to Ex-1012; 6 17 1 page 18 Exhibit 2061 - CV of Nikil Dutt; 97 pages 71 19 Exhibit 2062 - DATE Main Page; 1 page 44 20 Exhibit 2063 - Software and Hardware Implementation 76 21 of Lattice-based Cryptography 22 Schemes; 43 pages 23 24 (Exhibits not attached at the request of all counsel.) 25

Page 5

1 Reported Remotely; August 27, 2024; 1:13 p.m. EDT;

2

3 NIKIL DUTT, PH.D.,

4 having been first duly sworn, was examined and testified

5 as follows:

6

7 EXAMINATION

8 BY MR. KRUSIEWICZ:

9 **Q Please state your name for the record.**

10 A Nikil Dutt.

11 **Q Is there any reason why you cannot give**

12 **complete, truthful, and accurate testimony today?**

13 A No. But before we start, can I -- would it be

14 okay if I read the typographical corrections to my

15 declaration?

16 **Q Yes.**

17 A Okay. So as I was reviewing my

18 deposition (sic), I noticed some typos in some of the

19 page numbers that I would like to correct. And I will

20 read them out from the statement that I have here.

21 In paragraph 20, the citation to Exhibit 1

22 should be, quote, Exhibit 1 at pages 11, 12, 14, 20, 30,

23 close quote.

24 Then paragraph 21, the citation to Exhibit 1

25 should be, quote, Exhibit 1, comma, at page 18, close

Page 6

1 quote.

2 And, lastly, paragraph 23, the citation to

3 Exhibit 2 should be, quote, Exhibit 2 at page 60, close

4 quote.

5 Thank you.

6 MR. RYPKA: And I submitted -- or I uploaded

7 that to the chat, and it can be entered as Exhibit 1029.

8 (Exhibit 1029 was marked for identification.)

9 BY MR. KRUSIEWICZ:

10 **Q Dr. Dutt, could you please open the exhibit in**

11 **the chat that has been marked as Exhibit 1029.**

12 **Please let me know when you have it open.**

13 A Yeah. Just a second. Yes.

14 **Q Does Exhibit 1029 reflect all of the changes**

15 **and any inaccuracies in your declaration?**

16 A Yes, it does.

17 **Q All right. Dr. Dutt, have you been -- have you**

18 **been deposed before?**

19 A No, I have not.

20 **Q We have a court reporter here today. She's**

21 **taking down everything we say, but she cannot take down**

22 **testimony if we're talking over each other. So let's**

23 **please not try to do that.**

24 **Please let me finish my question before you**

25 **answer, and I'll try to let you finish your answer**

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1 before I move on to the next question.

2 **Do you understand?**

3 A Yes.

4 **Q The court reporter also cannot take down head**

5 **nods or unclear statements. So please be -- be sure to**

6 **reply -- to reply with a yes or no as appropriate**

7 **instead of head nods.**

8 **Do you understand?**

9 A Yes.

10 **Q If you need to take a break at any time during**

11 **this deposition, please let me know. I only ask that if**

12 **there is a question pending that you answer the question**

13 **before we take the break.**

14 **Do you understand?**

15 A Yes.

16 **Q Where are you physically located for today's**

17 **deposition?**

18 A I'm in Irvine, California, at my home.

19 **Q Is anyone in the room with you?**

20 A No.

21 **Q I ask that you please turn off your cell phone**

22 **and any other computers that you are not using for this**

23 **deposition.**

24 **Do you understand that you are not permitted to**

25 **consult with anyone or consult with any other sources**

Page 8

1 during this deposition?

2 A Yes. And I'll turn off my cell phone, as we

3 speak.

4 **Q Please let me know when you have turned it off.**

5 A Yes.

6 **Q Are you employed?**

7 A I'm sorry. Could you repeat the question?

8 **Q Are you employed?**

9 A Yes, I am employed.

10 **Q Who is your employer?**

11 A My employer is the University of California

12 Irvine.

13 **Q What is your title there?**

14 A My title is distinguished professor.

15 **Q And how long have you been there?**

16 A I've been at UCI for over 35 years.

17 **Q All 35 years as a distinguished professor?**

18 A No. I started as an assistant professor and

19 then rose through the ranks and was appointed

20 distinguished professor approximately four or five years

21 ago.

22 **Q Dr. Dutt, do you understand that you're here to**

23 **testify regarding a declaration you prepared in**

24 **connection with the proceeding involving Qualcomm and**

25 **Network System Technologies. Is that correct?**

Page 9 1 A Yes. 2 MR. KRUSIEWICZ: I'm introducing what has been 3 premarked as Exhibit 1012. Please let me know when you 4 have it open. 5 (Exhibit 1012 was marked for identification.) 6 THE WITNESS: Yes, I have it open. 7 BY MR. KRUSIEWICZ: 8 Q This is your declaration. Correct? 9 A That is correct. 10 Q Could you scroll to page 7 of your declaration 11 and let me know when you're there. 12 A Yes, I'm there. 13 Q This declaration is dated December 5th, 2023. 14 Correct? 15 A That is correct. 16 Q And is that your signature on page 7? 17 A Yes, that is my signature. 18 Q Are you aware of any inaccuracies in your 19 declaration apart from the inaccuracies noted in 20 Exhibit 1029? 21 A No. 22 Q Do you have an understanding as to what this 23 case is about? 24 A Could you repeat the question? 25 Q Do you have an understanding as to what this	Page 11 1 Mr. Nate Louwague who are -- 2 Q How long -- 3 A -- who are with Carlson Caspers. 4 Q How long did you meet with them? 5 A Probably about one or two hours in the last 6 one -- one week. 7 Q One to two hours each day, or total? 8 A No. For a total of one to two hours. 9 Q Did you meet with any lawyers from Samsung? 10 A Pardon me? Can you repeat the question? 11 Q Did you meet with any lawyers from Samsung in 12 preparation for today's deposition? 13 A No. 14 Q Dr. Dutt, did you write your declaration? 15 A So the material that I have in the declaration, 16 all of the facts have come from me. In particular, if I 17 look at Items 2 through 23, they are facts that come 18 from me, but I did seek the help of counsel to write the 19 actual material since I'm not familiar with the legalese 20 involved in writing a legal document. But the material 21 came from me in particular the Items 2 through 23 in my 22 declaration. 23 Q How long did you spend preparing your 24 declaration? 25 A I'd have to go back and check, but I would
Page 10 1 case is about? 2 A I'm not familiar with the details of the case. 3 All I was asked to do was to give a declaration about 4 the papers that appeared at DATE 2004. 5 Q So in paragraph 1 of your declaration, you 6 state that -- and I quote -- "I make this declaration at 7 the request of Qualcomm Incorporated in the matter of 8 Inter Partes Review of U.S. Patent Number 7,594,052." 9 Is that correct? 10 A That is correct. 11 Q Have you ever reviewed U.S. Patent Number 12 7,594,052? 13 A I'm not familiar with that patent. I've not 14 looked at that patent. I don't remember. 15 Q Do you know what subject matter is claimed in 16 the patent? 17 A I'm not familiar with the patent. So I do 18 not know. 19 Q Did you do anything to prepare for today's 20 deposition? 21 A I did have a couple of meetings with counsel 22 discussing -- since it's my first deposition, discussing 23 what a deposition might involve. 24 Q Who did you meet with? 25 A I met with my counsel, Mr. Peter Kohlhepp, and	Page 12 1 think probably over a couple of hours in terms of 2 gathering the facts and then reviewing graphs and coming 3 up with the final version that was presented at this 4 meeting. 5 Q Could you define "a couple of hours"? 6 MR. RYPKA: Objection. Form. 7 THE WITNESS: Between, say, two to four hours. 8 I don't have an exact recollection, but I would say on 9 the order of two to four hours. It could be -- it could 10 be more. But certainly more than two hours. 11 BY MR. KRUSIEWICZ: 12 Q Aside from the Qualcomm attorneys you mentioned 13 earlier, did you discuss the content of your declaration 14 with anyone else as you prepared it? 15 A No, I have not discussed it with anyone else. 16 Q You didn't discuss it with anyone at Qualcomm? 17 A No, I have not discussed it with anyone at 18 Qualcomm. 19 Q In the course of preparing your declaration, 20 did you do any research? 21 A Could you rephrase the question or repeat the 22 question again? 23 Q Did you do any research in preparing your 24 declaration? 25 A I did go to -- so, yes, I did some research

Page 13 1 because I had to review what had appeared in the DATE 2 2004 conference I attended as I mentioned in my 3 declaration. And that was well over 20 years ago. So I 4 had to go look at the website and look at my own C.V. to 5 see which papers had appeared at that conference as well 6 as the stated paper that I have in the declaration. So 7 I did that research -- if you call that research, yes, I 8 did that research to visit the date website, the 9 archive, to factually determine which papers had 10 appeared at the conference and which papers were 11 presented and were in the proceedings at that 12 conference. 13 THE REPORTER: May the reporter verify in the 14 answer, please, the conference date, was 2004 or 2024? 15 THE WITNESS: It's DATE 2004. 16 But also mentioned as DATE '04 in my -- in my 17 statement. 18 THE REPORTER: Thank you. 19 BY MR. KRUSIEWICZ: 20 Q So Dr. Dutt, you reviewed the DATE 2004 21 archives. Correct? 22 A That is correct, yes. 23 Q Did you review any individual articles 24 presented at the conference? 25 A Could you repeat the question? Is the question	Page 15 1 systems. 2 Q What was the purpose of the conference? 3 A Could you repeat the question? 4 Q What was the purpose of the conference? 5 A So the DATE conference is a professional 6 conference that is sponsored by the IEEE ACM. And this 7 particular conference brings together researchers, 8 practitioners, and the general public to discuss new 9 advances in electronic design, comprising design, test, 10 and -- design and test essentially. 11 Q Why did you attend the DATE 2004 conference? 12 A So I'm a professor of computer science, and in 13 my line of work, we present new research results at the 14 premier events in our professional communities. And 15 DATE is one of the leading conferences, technical 16 conferences, in my area, broad area of research. And so 17 it's a conference that I, as well as many other leading 18 researchers and practitioners, as well as students 19 attend to present work, discuss ideas, and essentially 20 have an opportunity to meet -- you know, to present new 21 results and listen to new work. 22 In my particular case, the question was why do 23 I attend it? Because I had -- in that year, I had 24 several papers, as I had indicated in my statement, that 25 were presented at that event, at that conference.
Page 14 1 did I review them recently, or did I ever review the 2 papers at -- in the proceedings? 3 Q I'll rephrase. 4 In the course of preparing your declaration, 5 did you review any individual articles presented at the 6 conference? 7 A No, I did not look at any of the detailed 8 papers in the proceedings. However, I did look at the 9 table of contents in the archive that's attached as 10 Exhibit 1 in my statement. 11 Q Apart from the archive, did you review any 12 documents in preparing your declaration? 13 A No. I did not review any other documents in 14 preparing this statement. 15 Q In your declaration, you state that you 16 attended the DATE 2004 conference. Is that correct? 17 A Yes, I did attend the DATE 2004 conference in 18 Paris, in person. 19 Q What was the DATE 2004 conference? 20 A The DATE 2004 conference is a conference on 21 design, automation, and test, comprising tracks of 22 material in those areas. And it's an annual conference. 23 For that edition, it was held in Paris. 24 Q The design, automation, and test of what? 25 A It's design, automation, and test of electronic	Page 16 1 Q Would it be fair to say that the motivating 2 factor is presentation of your own work? 3 A Could you repeat the question and clarify 4 what -- in what context that question is being asked. 5 Q I'll rephrase. 6 Would it be fair to say that the motivating 7 factor behind your attendance at the DATE 2004 8 conference was presentation of your own work? 9 MR. RYPKA: Object to form. 10 THE WITNESS: I attend many conferences for 11 reason of both presenting my own work as well as 12 listening to work of others as well as keynotes and it's 13 for broadening my professional interest as well as if I 14 have papers, then surely for presenting my own work as 15 well. 16 BY MR. KRUSIEWICZ: 17 Q What dates did the DATE 2004 conference occur 18 on? 19 A I'm going to look at my statement to see if I 20 have the dates in there. 21 So as I've indicated in Item 11 of my 22 statement, that conference was held February 16 through 23 20, 2004, in Paris, France. 24 Q Were you in attendance for all of these days? 25 A So it's well over 20 years. I don't know

Page 17 1 exactly which dates I attended. I was certainly there 2 at the time of registration, at which time I received 3 the proceedings, and I was certainly there for 4 presentation of my papers. But I don't remember if I 5 attended -- I was there for every single day between 6 February 16 through 20, 2004. 7 I have to go back and look at my travel 8 schedule to verify that. But I do not have that 9 information at this time. 10 Q Where was the DATE 2004 conference? 11 A The DATE 2004 conference was held in Paris, 12 France. 13 Q Could you be more specific? Was it in a 14 conference room in Paris? 15 A I'd have to go back and -- and check the 16 details. I don't know for sure, but I recall it was a 17 large convention center in Paris. But probably the 18 archives have details of the exact venue. It was 19 certainly a large convention center that afforded the 20 facility for multiple tracks to be held in parallel. 21 As you can see from the archive and the table 22 of contents, this conference typically has upwards of 23 three to four parallel tracks of papers that are 24 presented. And so it needs a large conference venue. 25 So my recollection is that it was held at a	Page 19 1 In addition, I attended a number of other 2 sessions. I don't remember exactly which. But I -- I 3 know for sure that I attended several sessions. 4 I met with several colleagues. I networked 5 with them. So it's also an event for professional 6 networking and meeting of other people. 7 BY MR. KRUSIEWICZ: 8 Q So the conference started on February 16, 2004. 9 Correct? 10 A That is my recollection, correct. And that is 11 what is shown in the exhibit as well, yeah. 12 Q So on February 16th, you would go to the 13 registration table. Correct? 14 A Correct. You -- as an attendee, you would go 15 to the registration table and present your 16 identification and receive the registration -- the 17 conference materials. Typically that included the 18 proceedings and some other program/brochure, and so 19 forth. 20 Q Following registration, would you immediately 21 go to a presentation? 22 A Could you clarify? Is that a question for me, 23 or are you asking in general would an attendee do that? 24 I don't understand the question. Could you please 25 clarify?
Page 18 1 large convention center in Paris. The exact venue, I do 2 not remember at this time. And I don't have that 3 information with me here at this time. 4 Q Is the conference open to the public? 5 A Yes. As I indicated in Item 18 of my 6 declaration, the conference is open to any interested 7 member of the public, but as with any conference, one 8 has to register to attend the conference. 9 Q Is there a registration fee associated with 10 attending the conference? 11 A Yes. As with most conferences, professional 12 conferences that are hosted by professional societies 13 such as IEEE ACM, there is a registration fee. 14 And as I also indicated in Item 18, if you're a 15 member of the professional society, then you would get a 16 discount as would authors who are presenting at the 17 conference, they would get a small discount to register. 18 Q What do you do at the DATE conference? 19 MR. RYPKA: Objection. Form. 20 THE WITNESS: So as I indicated earlier, for 21 all of these conferences including DATE, there are 22 multiple roles that an attendee might participate in. 23 One is if they have a paper, they might present a paper. 24 In my case, I did present two papers physically at that 25 conference.	Page 20 1 Q Generally following registration, would an 2 attendee attend a presentation immediately after 3 registration? 4 A So attendees can come in at different times. 5 Typically the conference would start with a set of 6 keynotes in the morning. So if attendees registered 7 early in the morning, then typically they would go and 8 listen to the first keynote. But many people also 9 decide to maybe get a snack or meet other people. 10 So it varies widely based on the interests of 11 the attendee and the reasons for why they're going to 12 that particular meeting. 13 So I -- it would be hard for me to give a 14 definitive answer on that question. In my particular 15 case, I don't remember because it's well over 20 years 16 ago. But I do know that typically if I register the 17 first thing in the morning and there's an interesting 18 keynote, I would like to listen to the keynote. So I 19 might proceed to listen to the opening keynote for the 20 conference. 21 Q In your experience, what would make a keynote 22 interesting? 23 A So, you know, I -- I'm not sure how this 24 relates to my declaration, but, yeah, in terms of a 25 conference, typically conference organizers would like

Page 21 1 to have, you know, experts from industry or from 2 academia or sometimes even from the government talk 3 about trends, talk about new things that are related to 4 what might interest that particular professional 5 community in attendance. 6 Q You testified you've attended nearly every DATE 7 conference since its creation. Is that correct? 8 A That's correct. As I say in Item 7 of my 9 declaration, I attended my first DATE conference in 10 1998, and I've attended nearly every DATE conference 11 thereafter. 12 Q Did you ever miss a keynote presentation? 13 A Can you clarify? Are you talking about a 14 keynote presentation at the DATE conference, or in 15 general? Because I attend many different conferences. 16 Can you please clarify the question? 17 Q Throughout the -- the history of the DATE 18 conference, so since 1998, every -- strike that. 19 For every DATE conference since 1998 that you 20 attended, have you ever missed a keynote presentation? 21 A So I -- you know, I -- I don't remember. Also 22 please note that the conference typically has multiple 23 keynotes. Typically they have evolved where they have 24 sometimes keynote every morning. So it's quite likely 25 that I may have missed some of the keynotes on the days	Page 23 1 sessions I attended. I do know that I attended every 2 single session where our papers were presented if they 3 were not conflicting in time because sometimes because 4 they're held in parallel, sometimes even our own papers 5 are scheduled in parallel sessions. So I do know that I 6 did attend as far as I could every session where our 7 papers were presented, regardless of whether I presented 8 them myself, of course, in which case I would be there, 9 or if my students or my coauthors were presenting the 10 paper. But besides that, I do not remember which 11 sessions I attended. 12 Q You referenced parallel sessions in your 13 previous answer. Is that correct? 14 A That is correct. 15 Q How are the parallel sessions organized? 16 A Is the question how are they physically 17 organized? I'm not sure I understand what that means. 18 Are you talking about in preparation of the program, or 19 in the actual logistics of how the sessions are 20 delivered at the conference? Can you please clarify. 21 Q Are the parallel sessions divided based on 22 subject matter, or some other criteria? 23 A Yes. Typically, my understanding is that the 24 parallel sessions are indeed organized by topical matter 25 so that attendees can -- who are interested in a
Page 22 1 when I attended. But my -- you know, I don't remember. 2 It's -- you know, there are far too many events. And I 3 don't keep track of every session that I attend. So I 4 don't have an answer -- a definitive answer for that 5 particular question. 6 Q After the keynote presentation, do you attend 7 subsequent presentations of the DATE conference 8 generally? 9 A Yes. I think I, as many attendees would, if 10 they attend the keynote, there would typically be a 11 coffee break and then following which the technical 12 sessions would start. And depending on the interest 13 that I have in the material in a specific session, I 14 might attend a session or I might take a break and talk 15 with colleagues, talk with my students. 16 So it very much depends on the program at hand 17 and the topics that are being discussed in those 18 technical sessions following the keynote. 19 Q With respect to the DATE 2004 conference, how 20 many presentations did you attend? 21 A Is the question how many presentations did I 22 attend in 2004 at that conference? 23 Q Correct. 24 A I do not remember. That's way over 20 years 25 ago. I think I -- I don't remember how many, you know,	Page 24 1 specific topic might attend a specific session. 2 So, for example, if you go to Exhibit 1, 3 page 10 of my declaration -- and let me know when you're 4 there so we can go over that at the same time. 5 Q I'm there. 6 A Okay. So you can see that there's a keynote 7 session that was held where there was a speaker, 8 Spirakis, I believe, that talked about opportunities and 9 challenges in building silicon products, blah, blah, 10 blah, following which there was Session 1 where there 11 were four sessions held in one, two, three, four. Yes. 12 Five sessions. Six sessions. Six sessions held in 13 parallel labeled 1A through 1E. And so each of those 14 sessions cover a specific topical area. 15 So you can see in -- on page 10, Session 1A is 16 an architectural level power management. 1B is on 17 formal verification, et cetera, et cetera. 18 And these were held in separate rooms at the 19 convention center so attendees who are interested in a 20 specific topic can go to that room and listen to the 21 presentation on that topic. 22 Q Referring to page 10 of your declaration, would 23 you agree that there were four papers presented within 24 the 1A session? 25 A Based on what I see in the archive, there were

Page 25 1 indeed four sessions presented in Session 1A of DATE 2 2004. That is correct. 3 Q Is it your understanding that these would be 4 presented in sequential order in the same room? 5 A Yes. Typically, the sessions would be held in 6 a specific room. The moderator would introduce the 7 session, following which each of these papers that are 8 listed in the session would be presented sequentially by 9 the -- one of the co-authors of that particular article. 10 That is the particular manner in which sessions that a 11 conference such as this are organized. 12 Q And then would you agree that there is three 13 papers presented within Session 1B? 14 A That's what I see in the proceeding -- in the 15 archival proceedings that Session 1B had three papers. 16 That is correct. 17 Q Is it your understanding that Session 18 1A -- strike that. 19 Is it your understanding that the presentation 20 of the papers within Session 1A occur at the same time 21 as the presentation of the papers in Session 1B? 22 A We'd have to go back and look at the actual 23 schedule. But typically, yes, the way it's organized is 24 that Session 1 would be held in parallel. So 1A, 1B, 25 1C, 1D, 1E, and 1F would all be held -- would start in	Page 27 1 having organized multiple conferences such as this. 2 Typically, the conferences would have blocks of time 3 where there would be, for example, a keynote in the 4 morning followed by a session, say one that's held in 5 parallel, followed by a coffee break, followed by 6 session two with multiple sessions in parallel, followed 7 by lunch break, followed by Session 3, or something like 8 that. 9 Now, the exact details of DATE 2004, I do not 10 remember because it may have varied. But it is common 11 that conference organizers including myself would -- 12 would organize it in a manner where there would be the 13 parallel sessions, labeled, say, one, A, B, C, D, E, 14 followed by a break, followed by parallel Session 2A, B, 15 C, D, E, and on occasions, there may also be plenary 16 sessions where they may want all of the attendees to 17 come together such as keynotes or special topics. 18 So in those cases, there would also be again 19 all the attendees would congregate in one large hall and 20 be together, and there would be no parallel session for 21 that particular instance of that time slot in the 22 conference program. 23 But, again, for the specific -- if I may make 24 sure that I -- I say things that are correct from my 25 memory, I don't remember the exact schedule for DATE
Page 26 1 parallel. Each session may have a varying time because 2 the number of papers may vary. And the last session, 3 1F, is a panel session, which is not a paper 4 presentation but a panel where the -- where the panel 5 organizer has a panel presented their views on a topic 6 with open Q&A with the audience. 7 So what I am trying to say is that they are 8 held in parallel, but the actual length of the session 9 may vary depending on how many papers are presented and 10 depending on the content that is being discussed at that 11 particular session. 12 Q Let's refer to both pages 10 and 11 of your 13 declaration. Let me know when you're there. 14 A Yes. 15 Q Do you see on page 101 session is labeled 1A? 16 A Yes, I see that. The archive has a session 17 labeled 1A. 18 Q And then on page 11, there's a session labeled 19 2A. 20 Do you see that? 21 A Yes. I see on page 11 that there's a session 22 labeled 2A. 23 Q What is your understanding as to the numbering 24 system of the archive? 25 A I can give you my experience in this matter,	Page 28 1 2004. However, this is typically how the DATE 2 conferences have been organized to the best of my 3 recollection. 4 THE REPORTER: May the reporter verify in the 5 answer, please, a term or word. 6 On occasions, there may be plenary sessions, or 7 can you verify that word. 8 THE WITNESS: Plenary, yes, p-l-e-n-a-r-y, 9 sessions. 10 THE REPORTER: Thank you. 11 BY MR. KRUSIEWICZ: 12 Q Dr. Dutt, let me see if I'm understanding you 13 correctly. All of the sessions within -- let's call it 14 Session 1 would be hypothetically presented between 15 9:00 a.m. to noon while all the sessions within Session 16 2 would be hypothetically presented between 1:00 to 17 4:00? 18 MR. RYPKA: Object to form. 19 THE WITNESS: May I answer the question now? 20 BY MR. KRUSIEWICZ: 21 Q Yes. 22 A You know, I don't remember the exact schedule, 23 but it's very likely that each paper was about a half 24 hour long. So the first session, let's say if the 25 conference started at 9:00 with a keynote, 9:00

Page 29 1 to 10:00. And say at 10:30, they would start Session 1, 2 that would run from 10:30 to 12:00 noon or 3 12:30 depending on if there are three or four papers. 4 Then there would be a break, and then the 5 second session would start after lunch for one and a 6 half hours or two hours, depending on the length of the 7 session. And -- and so forth so that -- that is how the 8 DATE conferences are typically organized. 9 However, in this particular instance, since I 10 do not see the actual schedule, I cannot say with 11 definitive answer if indeed that was followed. But that 12 is typically how the DATE conferences even today are 13 organized. 14 Q Do the organizers of the DATE conference assign 15 each attendee a schedule? 16 MR. RYPKA: Object to form. 17 THE WITNESS: I don't know what the organizers 18 do, but as an attendee, I can tell you that we are 19 simply handed the conference program, and we -- we are 20 handed the conference proceedings and then we're free to 21 go where we want based on what we want to do. So 22 there's no assigning of sessions as far as know -- as 23 far as I know except with the exception that there's an 24 expectation that speakers who are in a session will stay 25 for the entire session where they -- so they don't just	Page 31 1 committee and a technical program committee. And so I 2 may have been part of the technical program committee, 3 but I don't think I was part of the organizing committee 4 for that year of that conference. 5 But, again, it's my recollection. I did not do 6 research on that for this deposition. 7 Q How do you submit a paper to the DATE 8 conference? 9 A So as with all IEEE ACM conferences, the 10 conference organizers have a call for papers with a 11 schedule date by which time a formatted paper has to be 12 submitted for review. 13 That review process is done by the technical 14 program committee who then evaluate the submitted papers 15 and select the ones for presentation. They accept them 16 for presentation at the conference at which time the 17 authors get notified that their paper has been selected 18 and they should present that paper at the conference. 19 Q So there is a submission deadline. Correct? 20 A There is a submission deadline for papers 21 for -- call for papers including a submission deadline 22 for each DATE conference, that's correct. 23 THE REPORTER: May the reporter verify in the 24 answer, please, there is a submission deadline for 25 papers for call?
Page 30 1 speak and then leave the session in the middle. So it's 2 often the case that if you're the first speaker in the 3 session, it's polite to stay until the last talk and 4 answer questions. But there's -- to the best of my 5 knowledge, I, as an attendee, have not been told to go 6 to a specific session by a conference organizer. 7 BY MR. KRUSIEWICZ: 8 Q Did you work for the DATE 2004 conference? 9 A Could you -- could you clarify what you mean by 10 work for the conference. Can you please explain what 11 you're asking. 12 Q Would you consider yourself an organizer of the 13 DATE 2004 conference? 14 A I'd have to go back and check if I was involved 15 with DATE 2004. We'd have to go and look at the list of 16 organizers. I don't remember. 17 I have been involved in the technical program 18 committee of multiple DATE conferences over the years. 19 But for that particular instance, I do not have that 20 answer. I'd have to go and research that to see if I 21 was not an organizer but as part of the technical 22 program committee. 23 However, I was not on the organizing committee 24 for DATE 2004. 25 So the conferences typically have an organizing	Page 32 1 THE WITNESS: Sorry. There's a special 2 deadline indicated in the call for papers for each 3 conference. 4 BY MR. KRUSIEWICZ: 5 Q Does the conference ever suggest changes or 6 edits to a paper? 7 A Is the question about the DATE conference, or 8 conferences in general? 9 Q The DATE conference. And just for the record, 10 every time I use the term "conference," I'm referring to 11 the DATE conference, unless noted otherwise. 12 A Thank you. 13 Q I'll try to be more specific in my questions in 14 the future, though. 15 A Thank you. 16 So could you repeat the question? I forgot 17 what you said. Sorry. 18 Q Does the conference ever suggest edits or 19 changes to a paper? 20 A Can you clarify at what stage you're asking if 21 the conference suggests changes or edits? Because there 22 are multiple stages at which the conference deals with 23 the papers. So could you clarify at what stage you're 24 asking if the conference suggests changes to be made to 25 a paper?

Page 33 1 Q At which stage would the conference suggest 2 edits or changes to a paper? 3 A So the only phase at which the conference may 4 suggest edits are formatting changes for the paper 5 and/or specific concerns that reviewers may have had 6 during the review process that's feedback given to the 7 authors based on the review. 8 So there are two points in which the conference 9 may suggest some changes. One first might be during the 10 review process if there are some suggestions for 11 improvement or clarification, that's feedback to the 12 authors that the program -- technical program committee 13 gives on behalf of the conference to the authors. 14 And the second time might be when the authors 15 submit a camera ready version of the paper, they have to 16 follow specific formatting guidelines per the conference 17 proceedings. And so if those particular guidelines are 18 violated, if something is off the margin or a page 19 number is not in the right place or the copyright is not 20 in the right place, then they would suggest changes in 21 formatting. 22 Q You were on the technical program committee for 23 at least one DATE conference. Correct? 24 A Yes, that is correct. 25 Q What type of changes would you suggest to	Page 35 1 think, you know, we, as academics who have been in the 2 field for a long -- a lot of time. So we try to 3 evaluate besides the technical soundness what we 4 perceive as the quality of the work and maybe if there 5 is some innovative ideas, things of that nature. 6 So some are objective. Some are subjective 7 as -- as you'd see in any review process. 8 BY MR. KRUSIEWICZ: 9 Q Have you ever rejected a submitted paper as a 10 technical committee member? 11 MR. RYPKA: Object to form. Scope. 12 THE WITNESS: Yeah, I'm -- you know, I'm not 13 certain I understand the context of the question with 14 respect to my -- my statement here. But to answer your 15 question, the review process is not just one reviewer. 16 There are multiple reviewers. And each reviewer gives 17 his or her own feedback on the paper. 18 So in answer to your question, yes, there are 19 many papers over my, you know, 35-plus years of career 20 in academia that I have suggested rejection. That does 21 not mean that the paper was rejected. That just means 22 that my personal opinion was that that paper did not 23 meet the standard for acceptance, in my view. 24 So in that case, I did recommend rejection, but 25 the paper may have been accepted, may have been
Page 34 1 papers that were submitted to the DATE conference in 2 your position as a technical program committee member? 3 A So an example of a change that might -- that 4 might be suggested is if there is a typographic error in 5 the paper, a missing reference, or possibly even 6 suggestions for more experimentation if the results 7 could benefit from additional experimentation. 8 So these are kinds of things that typically I, 9 as a reviewer, might give as feedback to the authors in 10 revising their papers for final submission to the 11 conference. 12 Q Would it be fair to say that as a technical 13 program committee member, you review each paper for 14 technical soundness? 15 MR. RYPKA: Object to form. 16 THE WITNESS: Yes. That's the rule -- the rule 17 of the technical program committee is to evaluate the 18 technical soundness and the quality, the technical 19 quality of the -- of any paper that's submitted to a 20 conference. 21 BY MR. KRUSIEWICZ: 22 Q What criteria do you look for as a technical 23 committee member for acceptance of papers? 24 MR. RYPKA: Object to form. 25 THE WITNESS: That's a -- a good question. I	Page 36 1 rejected, based on the consensus of the -- the reviewers 2 and the decision of the technical program chair of that 3 particular conference. 4 But, again, I -- I -- I'm not sure the context 5 for this question with how it relates to my particular 6 statement that I have in my declaration. 7 BY MR. KRUSIEWICZ: 8 Q Referring to the DATE 2004 conference, what 9 does a typical presentation look like? 10 MR. RYPKA: Objection. Form. 11 THE WITNESS: So the -- as with any technical 12 conference in my field, the conferences, depending on 13 the amount of time, there's -- if it's a 30-minute slot, 14 probably the expectation is that the speaker would 15 present their paper in about 25 minutes of time, leaving 16 about five minutes for question and answer at the end of 17 that particular time slot. 18 MR. KRUSIEWICZ: Okay. I think we've been 19 going about an hour. Is now a good time to take a 20 break? 21 MR. RYPKA: Good with me. 22 THE REPORTER: Off the record at 2:05 p.m. 23 (Recess from 2:05 p.m. to 2:16 p.m.) 24 THE REPORTER: We're back on the record at 25 2:16 p.m.

Page 37 1 BY MR. KRUSIEWICZ: 2 Q Dr. Dutt, let me refer you to paragraph 13 of 3 your declaration. Please let me know when you're there. 4 A Yes, I'm there. 5 Q You testified that a copy of all the papers 6 accepted for the DATE 2004 conference, either in paper 7 form or CD form, was given to conference participants 8 upon registration. Is that correct? 9 A That's correct, as I've stated in Item 13 of my 10 declaration, yes. 11 Q Did you receive a paper copy, or a CD copy? 12 A I don't remember exactly whether it was paper 13 or CD. I do remember that all of the conferences 14 evolved to a model where they moved from paper to CD to 15 thumb drive to completely electronic. 16 So for the DATE 2004 conference, I don't 17 remember, you know, whether it was a paper or CD because 18 I don't remember what era that was in. 19 But I certainly remember receiving the copy of 20 the proceedings as did every attendee at the 21 registration desk because that is the norm for all of 22 the conferences where when you register, you receive a 23 registration packet that includes the copy of the 24 proceedings and a program and some other swag. But for 25 that particular conference, I don't remember if it was	Page 39 1 laptop, copied it over to my drive and then used that as 2 a reference. 3 So I don't remember exactly if it was paper or 4 CD. And I don't remember what exactly I did with it. 5 But I do remember that I got it, and I did, you know, 6 make sure that my six papers, all six papers were in the 7 proceedings. 8 Q Once you received the copy of the conference 9 proceedings, were there any restrictions associated with 10 dissemination of the papers? 11 A Let me understand the question. Is the 12 question after we, as attendees receive the papers, is 13 there any restriction on the use of the papers? I -- I 14 didn't understand what the question was, I guess? 15 Q Yeah. Is there any restriction on the use of 16 other people's papers after you received them at the 17 conference? 18 A All papers that appear in the proceedings are 19 copyright by the profession sponsors, IEEE ACM. So one 20 is free to use that material as long as they reference 21 those particular papers correctly, cite them correctly 22 in the research. But otherwise, they're publicly 23 available to anyone who registered at the conference and 24 anyone who has access to the proceedings. 25 Q Were you allowed to upload them online?
Page 38 1 paper or CD, but I do remember that I was given a copy 2 of the proceedings because I checked to see that my 3 paper was in -- my papers were in there. 4 Q What did you do with your copy after the 5 conference? 6 A If it was physical, I can tell you that I and 7 many others simply dumped it after we looked at it 8 because if it was physical, there were probably multiple 9 volumes. There are over 300 papers. So they were 10 typically -- in that year, there used to be like phone 11 books, like Volume 1, 2, 3. And I didn't want to schlep 12 that back on the plane. So I probably at that point 13 made sure that my paper was there and then probably 14 just, you know, recycled it or if there were some 15 interesting papers, I might just keep that volume for a 16 night or two in my hotel room and then get rid of it 17 before I left the conference. 18 So depending on, you know, what was interesting 19 at that time -- I don't remember exactly. But very 20 likely that I either carried it back with me to my hotel 21 room to review some of the papers that were interesting 22 or in the case that some volumes didn't look that 23 interesting, I may have just discarded that if it was 24 paper. 25 If it was CD, then I probably popped it into my	Page 40 1 A You know, I don't remember what was the 2 situation in 2004. I don't even remember if you had 3 things at the point where you had stuff. I probably 4 think there was a web page online. But you -- as 5 attendee, you were not allowed to distribute the papers 6 yourself without permission from IEEE ACM because 7 they're held -- they're copyright by IEEE ACM. 8 Q Did you ever try to locate a copy of -- strike 9 that. 10 Did you ever try to locate your copy of the 11 DATE 2004 conference proceedings? 12 A Could you clarify at what point in time the 13 question is relating to. 14 Q In preparing your declaration, did you try to 15 locate a copy of the conference proceedings that you 16 received at the DATE '04 conference? 17 A Yes. I went to the archive, as I've indicated 18 in Exhibit 1 of my declaration. And the DATE conference 19 has an archive of all of the conference proceedings that 20 have appeared since I guess 1998. 21 And so I did go to the archive, to the event in 22 2004 and looked at the specific list of papers in the 23 table of contents that's shown in Exhibit 1 of my 24 declaration. So, yes, I did go to the website, and I 25 did look at the table of contents and checked to see

Page 41 1 that my papers were in that table of contents. 2 And I think I have mentioned that in my 3 declaration, in Item 20 of my declaration. 4 Q But you never tried to locate your own personal 5 copy of the conference proceedings? 6 MR. RYPKA: Objection. Asked and answered. 7 THE WITNESS: Could you repeat the question 8 again? 9 BY MR. KRUSIEWICZ: 10 Q You never tried to locate your personal copy of 11 the conference proceedings that you received at the DATE 12 conference. Correct? 13 MR. RYPKA: Objection. 14 THE WITNESS: I wasn't -- sorry. Yeah. 15 There's no need for me to do it because the papers are 16 available in the archive. So there's no reason for me 17 to locate the physical copy of the proceedings. 18 And as I mentioned, several attendees, 19 including myself, possibly may have discarded them if 20 they were too bulky if they were in paper form. And if 21 they were in CD form, I probably uploaded that to my 22 hard drive. So there would be no reason for me to try 23 and locate the physical copy of the proceedings. 24 BY MR. KRUSIEWICZ: 25 Q So when you're referring to the term	Page 43 1 conference to upload them online into an archive? 2 MR. RYPKA: Object to form. 3 THE WITNESS: So the date -- every IEEE ACM 4 conference is required to have all of the papers 5 available in proceeding form for the attendees at the 6 time of registration because they're paying for it. 7 They're paying for access to the papers when they attend 8 the conference. 9 So the conference does make -- currently as of 10 today, the conference does make those sets of papers 11 available online to the attendees at the time when they 12 register for the conference on the first day of the 13 conference. So that's a requirement for -- as far as I 14 know of all ACM IEEE conferences. 15 BY MR. KRUSIEWICZ: 16 Q Is that the same for non-attendees? 17 A Is what the same for non-attendees? Can you 18 clarify? 19 Q Do non-attendees get the set of papers online 20 at the time of the conference? 21 A I don't have an answer for that question. I'd 22 have to research that because it depends on what the 23 policies of the sponsors, IEEE ACM for this particular 24 event have. So I do not -- I'd have to research that. 25 I have not prepared for that -- I don't have an answer
Page 42 1 "proceedings," are you referring to what is displayed as 2 Exhibit 1 to your declaration? 3 A So what's shown in Exhibit 1 is the archive of 4 the proceedings, and these were the proceedings that 5 were handed out at that particular conference. So, yes, 6 what you see in Exhibit 1 is the table of contents. 7 It's the cover page, I would think, of the paper version 8 that appeared. So page 9. If you go to page 9 of my 9 declaration, you can see the front page of the DATE '04. 10 And it says proceedings Volume 1, edited by the general 11 chairs, Georges Gielen and Joan Figueras. 12 So this is the actual archive of the physical 13 proceedings that were handed out to each attendee at the 14 conference. 15 So, yes, when I refer to proceedings, I'm 16 talking about this particular proceedings that you see 17 here of which I have included the table of contents from 18 the archive. 19 Q Do you know when the papers presented at the 20 conference become publicly available from the DATE 21 website? 22 A In -- in general, when does that happen? Is 23 that the question? Or are you talking about DATE 2004? 24 Q Generally following a DATE conference, how long 25 are they -- how long does it take for the DATE	Page 44 1 for that. 2 MR. KRUSIEWICZ: I'm introducing what has been 3 marked as Exhibit 2062. 4 (Exhibit 2062 was marked for identification.) 5 BY MR. KRUSIEWICZ: 6 Q Dr. Dutt, please let me know when you have it 7 open. 8 A Yes, I have it open. 9 Q Do you see at the top there in big red font 10 that says "All DATE proceedings are accessible from the 11 DATE venue and will be publicly available two years 12 after DATE"? 13 A I see that, yes. 14 Q So is it your understanding that all the 15 proceedings will be publicly available to non-attendees 16 two years after DATE? 17 MR. RYPKA: Object to form. Scope. 18 THE WITNESS: I see what's written here, but I 19 don't know what was done, you know, in 2003. This -- 20 what's shown -- what I see here is from 2014. So I -- 21 you know, I -- I can't answer that. I'd have to 22 research that. If you ask me if I -- if I see what I'm 23 reading, it says all DATE proceedings are accessible 24 from the DATE venue and will also be publicly available 25 two years after DATE. That's what it says on this

Page 45 1 particular exhibit. But I can't -- I can't speak to 2 what's done -- what was done in 2004. And I'm not an 3 organizer of the conference. So I can't speak to 4 exactly what was being done. All I can say is I'm 5 reading what you show on the screen here. 6 BY MR. KRUSIEWICZ: 7 Q Do you know if the DATE conference is recorded, 8 either audioly (sic) or visually? 9 A I don't know for sure. I don't think they do 10 because they'd have to get permission from the authors 11 that they're being recorded. And this is held in 12 Europe. And as you know, Europe has much stronger 13 regulations. So I don't know for sure. 14 But my recollection is that typically the -- 15 the actual presentations were typically not recorded. 16 Perhaps because the conference wanted people to attend 17 the sessions in person. 18 However, during the pandemic, many things 19 changed. So I -- you know, I don't have a history of 20 how things worked or I haven't researched that question. 21 So I can't say definitively. 22 MR. KRUSIEWICZ: I'm introducing what has been 23 premarked as Exhibit 1005. 24 (Exhibit 1005 was marked for identification.) 25	Page 47 1 paper, but I have not looked at that paper recently. 2 BY MR. KRUSIEWICZ: 3 Q Do you recall ever reading Exhibit 1005 prior 4 to being engaged in this matter? 5 MR. RYPKA: Object to form. Scope. 6 THE WITNESS: It's possible. You know, I work 7 in the area of design automation. And so I've reviewed 8 a lot of different pieces of work. So it's -- it's 9 quite possible. I don't remember at this time if I 10 specifically read it, when I read it. You know, I've 11 been in the field for 35 years. So it's possible I've 12 read it, but I don't remember. 13 BY MR. KRUSIEWICZ: 14 Q Are you familiar with any of the authors of 15 this paper? 16 MR. RYPKA: Object to form. Scope. 17 THE WITNESS: Can you rephrase the question? 18 When you say familiar with the authors of the question 19 (sic), what do you mean by that? 20 BY MR. KRUSIEWICZ: 21 Q Have you met Andrei Radulescu? 22 A I don't remember meeting Andrea Radulescu. 23 Q Have you met John Dielissen? 24 A I don't remember meeting John Dielissen? 25 Q Have you met Kees Goossens?
Page 46 1 BY MR. KRUSIEWICZ: 2 Q Dr. Dutt, please let me know when you have had 3 a chance to open it. 4 A Yes, I have the exhibit open. 5 Q What is Exhibit 1005? 6 A It shows a paper entitled "An Efficient On-Chip 7 Network Interface Offering Guaranteed Services, 8 Shared-Memory Abstraction, and Flexible Network 9 Configuration." 10 Q Have you seen Exhibit 1005 before -- 11 MR. RYPKA: Object to -- 12 BY MR. KRUSIEWICZ: 13 Q -- this deposition? 14 MR. RYPKA: Object to form. Scope. 15 THE WITNESS: I recognize the title. And the 16 title is the same as what I have in my exhibit, if I go 17 to -- I'm sorry. My declaration. So if I go to my 18 declaration, it appears to be the same as -- I have to 19 confirm this -- Item 21 in my declaration, "An Efficient 20 On-Chip Network Interface Offering Guaranteed Services, 21 Shared-Memory Abstraction, and Flexible Network 22 Configuration," by Radulescu, Dielissen, Goossens, and 23 others. Let me see what popped up. It appears to be 24 the same article with the same title and same authors. 25 And it appeared at DATE 2004. So it must be the same	Page 48 1 A I probably met him several times at DATE 2 conferences because the name looks familiar and he's 3 very active in the area. So it's very likely that we 4 have crossed paths. But I don't remember when and 5 where, whether it's at DATE or other conferences. 6 Q What do you mean by "he's very active in the 7 area"? 8 A Sorry? 9 Q Do you -- when I asked have you met Kees 10 Goossens, you said "The name looks familiar, and he's 11 very active in the area." 12 What do you mean by that? 13 A So if you go to Exhibit 2 in my declaration, 14 page -- starting page -- page 50 in my declaration, you 15 can see that Kees Goossens has a lot of publications in 16 the topic. So he's very active in the area. That's 17 what I mean by "he's active in the area." He's -- like 18 I do, I have many publications in the area. 19 Q Have you attended one of his presentations? 20 A I don't remember. Quite possible. Like I 21 said, he's very active, and I'm active. He's probably 22 attended mine. I've attended his. But I -- I don't 23 remember exactly. 24 We probably -- we probably meet at conferences 25 too. So it's just I don't remember.

Page 49 1 Q And you don't recall any specific interaction 2 with Kees Goossens, do you? 3 MR. RYPKA: Object to form. Scope. 4 THE WITNESS: I -- I don't remember. Yeah. 5 BY MR. KRUSIEWICZ: 6 Q Is it your understanding that Exhibit 1005 was 7 presented at the DATE 2004 conference? 8 A Yes. If you look at page 1 of the exhibit, at 9 the bottom of that first page of Exhibit 1005, it says 10 "Proceedings of the Design, Automation and Test in 11 Europe Conference and Exhibition (DATE '04)." So, yes, 12 it's my understanding that this paper did appear and was 13 presented at the conference, as I've also stated in my 14 declaration on Item -- Item 24, which says that the 15 paper entitled Efficient On-Chip, et cetera, et cetera, 16 by authors is included in this list of proceedings from 17 DATE '04 conference, Exhibit 1, at page 11. I think the 18 page number is incorrect but -- 19 Q Did you attend the presentation of this paper 20 at the DATE '04 conference? 21 A I don't remember. Frankly, it's over 20 years 22 ago. So I don't remember. I may have attended it. As 23 I mentioned, if it was in a parallel session with one of 24 my own papers, very likely that I did not attend it. If 25 it was not in parallel, I may have attended it, based on	Page 51 1 co-author Kees Goossens' publication page where he's 2 listed the same paper as having been appeared -- as 3 having had appeared at the DATE 2004 conference. 4 So if you go to page -- just to finish, just to 5 make sure I'm clear, on page 60, I believe, of my 6 statement, you can see the Item No. 210 -- is it 210? 7 DATE 2004. Sorry. It's Item No. 202 on page 60 of my 8 Exhibit 2 in my statement. Sorry. Please go ahead. 9 You were asking something. 10 BY MR. KRUSIEWICZ: 11 Q Dr. Dutt, you said you were given a physical 12 copy of the DATE '04 proceedings. Correct? 13 A That is correct. I and every attendee was 14 issued a physical copy of the proceedings at the time we 15 registered for the conference. 16 Q You don't recall specifically seeing 17 Exhibit 1005 in that copy of the proceedings, do you? 18 A I think the proceedings had over 300 papers in 19 multiple volumes. So it's unlikely that any attendee 20 would look at every paper. I did, however, confirm that 21 my own papers were in the conference proceedings. And I 22 do recall receiving a physical copy of the proceedings 23 that included this particular paper, as I've stated in 24 my -- in my statement -- in my declaration. Sorry. 25 Q You said you, quote, "Recall receiving a
Page 50 1 what else was interesting or if I had other commitments 2 or engagements at that time. So I do not remember. 3 It's well over 20 years. But I do know that the paper 4 did appear, as I mentioned. And as you've shown in the 5 exhibit, it did appear in the proceedings of that 6 conference. 7 Q What is the basis of your understanding that it 8 was -- that it appeared at the DATE '04 conference? 9 MR. RYPKA: Object to form. 10 THE WITNESS: So as I've indicated in my -- in 11 my statement, every paper -- let me -- let me make sure 12 I can find -- 13 So if you look at Item 15 on page 4 of my 14 declaration, I state when I checked in at the DATE '04 15 conference, I was given the physical copy of the DATE 16 '04 proceedings, either in paper or CD form. This 17 physical copy of the DATE '04 proceedings included all 18 of the papers accepted for that year's conference. 19 And if you look now at Exhibit 1, which is the 20 table of contents for all papers accepted in the 21 conference, indeed the paper in Exhibit 1005 does appear 22 in this exhibit, which indicates that it was included in 23 the proceedings for that particular event as were all 24 papers that were presented at that conference. 25 Now, this is also listed in Exhibit 2 in the	Page 52 1 physical copy of the proceedings that included this 2 particular paper," end quote. 3 What particular paper are you referring to? 4 A So I recall receiving a copy of the proceedings 5 that included all of the papers that were accepted at 6 DATE 2004, including the paper that I've listed in 7 Item 21 of my declaration, the paper entitled "An 8 Efficient On-Chip Network Interface Offering Guaranteed 9 Services, Shared-Memory Abstraction, and Flexible 10 Network Configuration," by Radulescu, et al. 11 So that paper and all of the other papers that 12 appeared at DATE 2004 were in the proceedings that were 13 handed out to me and all the participants at the time of 14 registration at the conference. 15 Q Let me clarify. You specifically remember 16 seeing Exhibit 1005 in the copy of the proceedings that 17 you received from the DATE '04 conference? Is that your 18 testimony? 19 A I did not state that. I stated that I 20 specifically received a copy of the proceedings that 21 included all of the papers that appeared at the DATE 22 2004 conference, including the paper listed in Item 21 23 of my declaration. 24 I did check to see that my own six papers were 25 in there. But the proceedings had all of the papers

Page 53 1 that appeared at DATE 2004. 2 Q Did you check the proceedings to ensure that 3 every paper was there? 4 A Are you asking if I checked to see if all 5 300-plus papers were in the proceedings? 6 Q Yes. Did you check the proceedings to ensure 7 that every paper was there? 8 A No, I did not check that. There's no reason 9 for me to do that because by regulation from IEEE ACM, 10 they have to have all papers in the proceedings for 11 authors to present their paper at the conference. 12 So I have no need to check that, nor would I, 13 nor any attendee check to see. That's the job of the 14 conference organizers. 15 Q So you don't specifically remember seeing 16 Radulescu 2005 -- 2004 at -- strike that. 17 So you don't specifically remember seeing 18 Exhibit 1005 in the conference -- in the copy of the 19 conference proceedings that you received at the DATE '04 20 conference. Correct? 21 MR. RYPKA: Object to form. 22 THE WITNESS: So I don't remember seeing all of 23 the 300 papers in the conference proceedings, but do I 24 know, again, for a fact that the papers did appear in 25 the proceedings, as I've stated in my statement and as	Page 55 1 So, yes, all of the six papers were physically 2 presented by someone. I don't remember who presented 3 the other four. It could be one of my students or 4 coauthors or one of my coauthors' students. 5 Q In paragraph 18 of your declaration, you state 6 that "Authors of accepted papers were required to 7 register and present their papers in person at the 8 conference." 9 Do you see that? 10 A Yes, I see that. 11 Q So in the case that there are multiple authors 12 on a single paper, do they all have to register and 13 present? 14 A Typically, one author, the presenting author, 15 has to register for the conference and present at the 16 conference. And that author, as I mentioned in Item 18, 17 that author would get a discount on the registration fee 18 as a presenting author for the conference, as would 19 other IEEE ACM members. 20 Q When do you find out the presentation schedule 21 for the DATE '04 conference? 22 A I don't remember exactly what the events -- 23 list of events and timing was for DATE 2004, but I can 24 state that in general the process involves once a paper 25 is accepted, the authors submit a camera ready version,
Page 54 1 I've shown in Exhibit 1 and also as shown by one of the 2 coauthors of Exhibit 2 of my statement. 3 BY MR. KRUSIEWICZ: 4 Q You had six papers accepted to the conference. 5 Is that correct? 6 A That is correct. 7 Q And you presented on two of the six. Right? 8 A That is correct. As I've stated in Item 19 of 9 my statement, I personally presented two of my papers, 10 the first entitled network topology exploration, et 11 cetera, et cetera. And the second "Energy-aware system 12 design for wireless multimedia." 13 Q Were the other four papers presented? 14 A Is the question were they physically presented 15 at the conference? 16 Q The other four. 17 A Yes. All -- you know, every paper that appears 18 in the conference proceedings has to be presented in 19 person. So either my student or a co-author presented 20 the other papers. I don't remember exactly who at this 21 point. I haven't done the research on that. But each 22 of the papers was presented. And indeed the conference 23 requires that every paper be presented -- accepted for 24 the conference be presented at the conference, 25 physically presented at the conference.	Page 56 1 the conference compiles the proceedings, organizes the 2 schedule, and then informs the authors of the schedule. 3 Typically maybe a week or two or more before the 4 conference actually opens. But I don't remember the 5 exact date. And each conference has its own timeline. 6 So to your specific question for DATE '04, I 7 don't remember exactly when the conference schedule was 8 open to the public. I don't have that information. 9 Q And Andrei had two papers accepted to the 10 conference. Is that correct? 11 MR. RYPKA: Object to form. Scope. 12 THE WITNESS: I'd have to go and look. I 13 didn't look at all the list of papers so I don't know. 14 I'd have to go back and look to see if it's there. But 15 I've not researched that. So I'm not prepared to answer 16 that question without looking more closely. 17 I do know that his paper that I've listed in 18 Item 21 did appear in the proceedings. But I don't know 19 if he had other papers. 20 BY MR. KRUSIEWICZ: 21 Q You testified that -- 22 A Or he or she. I don't even know if it's a he 23 or she. If they had other papers. I don't -- I don't 24 know. 25 Q You testified that Exhibit 1 is the online

Page 57 1 archives of the proceedings of the DATE 2004 conference. 2 Is that right? 3 A That's correct. The Exhibit 1 starting on 4 page 9 is a copy of the online archive of the 5 proceedings for the DATE 2004 conference. But I've not 6 listed the entire proceedings. I've only listed the 7 table of contents for that particular conference. The 8 proceedings itself, as you might imagine, is very large 9 with each paper. So what's listed is the list of the 10 table of contents from the archive for that particular 11 edition of the conference. 12 Q Did you create Exhibit 1? 13 A Could you rephrase the question. 14 Q The Exhibit 1 that's attached to your 15 declaration, did you create Exhibit 1? 16 A Did I create it? I downloaded the exhibit. I 17 downloaded the particular web page and then so created a 18 PDF of that. So yes. I went to the archive, and then I 19 downloaded this particular set of pages, yes. So if you 20 say I created that by that, if that's what you mean, 21 yes, did I download it, and I physically created a PDF 22 off the table of contents from that particular online 23 archive. 24 Q Did you create the archive that's represented 25 in Exhibit 100 -- or Exhibit 1 to your declaration?	Page 59 1 I don't remember when it was created. Again, that's 2 something that the conference organizers may know. 3 Q Referring to paragraph 23 of your declaration, 4 you testified regarding Kees Goossens' website. Is that 5 correct? 6 MR. RYPKA: Object to form. 7 THE WITNESS: So in Item 23, I -- I say that 8 Kees Goossens is one of the coauthors of Radulescu paper 9 and has the same paper listed and linked on his research 10 website as having been presented at the DATE 2004 11 conference. 12 And Exhibit 2 is what I downloaded from his 13 publications website that shows that that particular 14 paper is listed as having been presented at the DATE 15 2004 conference in his list of publications in 2004. 16 BY MR. KRUSIEWICZ: 17 Q Did you look at the website independently? 18 A Independent, meaning -- yes, I did. Mm-hmm. 19 Q So counsel for Qualcomm did not direct you to 20 the website. Correct? 21 A The counsel did not direct me to the website, 22 no. 23 Q Had you visited this website prior to authoring 24 your declaration? 25 A Are you talking about the publications website
Page 58 1 MR. RYPKA: Object to form. 2 THE WITNESS: Did I physically create the 3 archive? No, I did not physically create the archive. 4 The archive is created by the conference organizers of 5 the DATE conference. So I did not create the archive. 6 I was an attendee at the conference. And at this 7 time -- point in time, I'm a person who is viewing that 8 website that contains the archival content of every 9 proceedings for the DATE -- DATE conference starting in 10 1998. So I went to that website and downloaded the 11 table of contents. 12 I physically did not create the archive. The 13 archive is created by the organizers of the DATE 14 conference. 15 BY MR. KRUSIEWICZ: 16 Q Do you know when the archive was created? 17 A I don't have that information. I'm not -- I'm 18 not an organizer of the conference. So I don't have 19 that information. 20 Q Do you know when it was -- when the archive was 21 accessible to the public? 22 A Again, I don't have information on that. I 23 know that I was able to access -- access that when I did 24 that on November 3rd, 2023. And I have on occasion gone 25 to the archive to review papers in my recent past. But	Page 60 1 of Kees Goossens? 2 Q That's correct. 3 A I may have. Like I said, we are both active in 4 the field. We've been both active for over 30 years. 5 So on occasion, we do visit each other's websites. So 6 there may have been occasions in the past where I have 7 accessed the website to access, look at the list of 8 papers or things of that nature. 9 But I don't recall. Again, over a 20-year 10 period, we tend to reference each other's work and visit 11 each other's websites as is in common in academia when 12 you're researching work. And oftentimes, our students 13 also do that when they're doing literature searches. So 14 it's common practice that we visit each other's 15 publications and websites. But I don't remember exactly 16 when I did that -- if I did that when I did that. 17 Q You testified that Exhibit 1005, or Radulescu 18 2004, is, quote, listed and linked on his research 19 website as having been presented at the DATE '04 20 conference, end quote. 21 Do you see that? 22 A I see Exhibit 1005, yes. What was the question 23 again? 24 Q In paragraph 23 of your declaration, you 25 testified that Exhibit 1005 is, quote, listed and linked

Page 61 1 on his research website as having been presented at the 2 DATE '04 conference, end quote. 3 Do you see that in paragraph 23 of your 4 declaration? 5 A Yes, I do. Mm-hmm. 6 Q Where does it say in Exhibit 2 to your 7 declaration that Radulescu 2004 was presented at the 8 DATE '04 conference? 9 A So if you go to Item 18 in my declaration, I 10 state that when I registered for the conference, which 11 was opened, et cetera, the second sentence says that 12 authors of accepted papers were required to register and 13 present their papers in person at the conference. 14 So if the paper appeared in the proceedings, 15 then the paper had to have been presented at the 16 conference. 17 So, therefore, since Item 21, the paper 18 entitled an efficient on-chip network interface, et 19 cetera, et cetera, by Radulescu, appears in the DATE '04 20 proceedings, it had to have then been presented at the 21 conference. 22 Q So Exhibit 2 to your declaration does not 23 independently state that Radulescu 2004 was presented at 24 the DATE 2004 conference. Correct? 25 A Can you indicate which page number you're	Page 63 1 IEEE ACM conferences. It's a requirement that -- the 2 objective of a conference is the presentation of papers 3 with the material of the papers being presented in the 4 proceedings. Otherwise, there will be no conferences. 5 So it's not just my understanding. It's common practice 6 in IEEE ACM for conferences. 7 Q You don't actually have any personal knowledge 8 as to whether the Radulescu paper was presented at the 9 conference. Correct? 10 MR. RYPKA: Object to form. 11 THE WITNESS: It was 20 years ago. So I don't 12 know that I saw it, but I know for sure it had to have 13 been presented because it was accepted as a paper that 14 appeared in the proceedings of that conference. So I 15 know for sure that it has been presented because it 16 appeared in the conference. And any IEEE ACM conference 17 must have an author present the work at the conference 18 in order for the people to appear in the proceedings. 19 So all 300-plus papers that appear in the day 20 proceedings must have been presented in the sessions 21 that were listed in the table of contents as we 22 discussed earlier, in Session 1A, 1B, et cetera, in that 23 designated session. 24 BY MR. KRUSIEWICZ: 25 Q Well, you don't personally remember Radulescu
Page 62 1 talking about? 2 MR. RYPKA: Object to form. 3 BY MR. KRUSIEWICZ: 4 Q I'm referring to Exhibit 2, Dr. Dutt. 5 A Yes. Mm-hmm. 6 Q Exhibit 2 does not say that Radulescu 2004 was 7 presented at the DATE 2004 conference. Correct? 8 MR. RYPKA: Object to form. 9 THE WITNESS: So while it doesn't explicitly 10 state that it was presented, any conference paper that 11 appeared in the proceedings must have been presented at 12 conference. Otherwise, it does not appear in a 13 conference proceeding. So it is implicit -- when you 14 see that something was presented -- was published in a 15 conference and -- in a conference proceedings -- the 16 definition of a conference is that a paper is presented 17 at a conference. The definition of a journal is that it 18 is archival and there's no public presentation. 19 So by having the paper listed as having 20 appeared in the proceedings of the conference DATE 2004, 21 the paper must have been presented at the conference. 22 BY MR. KRUSIEWICZ: 23 Q That's based on your understanding as an 24 attendee of the conference. Correct? 25 A No. That's actually common practice for all	Page 64 1 2004 being presented at the conference. Correct? 2 MR. RYPKA: Object to form. 3 THE WITNESS: I don't personally remember any 4 of the 300 papers being presented in the paper at the 5 conference except for my six papers. But I do know that 6 they were presented at the conference because that's 7 what conferences are meant for. And it's a medium for 8 an exchange of ideas where authors present their papers. 9 So every paper in the proceedings, including the 10 Radulescu paper, has to have been presented at the 11 conference. 12 BY MR. KRUSIEWICZ: 13 Q So you're inferring that Radulescu 2004 must 14 have been presented based on Exhibit 1 and Exhibit 2 of 15 your declaration. Correct? 16 MR. RYPKA: Object to form. 17 THE WITNESS: So if you read Item 18 of my 18 declaration, authors of accepted papers were required to 19 register and present their papers in person at the 20 conference. So if a paper appears in the proceedings, 21 then that paper must have been presented at the 22 conference. So it's a requirement of IEEE ACM that 23 authors of accepted papers must present their papers at 24 the conference. And that's the whole goal of the 25 conference is to have authors present their papers

Page 65 1 in-person -- except during the pandemic -- in-person for 2 a paper to appear in the proceedings. So every one of 3 those 300-plus papers were presented in the sessions 4 that you see in Exhibit 1 of the table of contents for 5 DATE 2004. Every single paper was presented at the 6 conference. Otherwise, they would not appear in the 7 proceedings. 8 BY MR. KRUSIEWICZ: 9 Q And that's based on your understanding of how 10 conferences work. Correct? 11 A It's not just my understanding. It's something 12 that is common practice in IEEE ACM that conferences are 13 designed to have authors present their papers. It's not 14 just my understanding. It's common practice for every 15 researcher who works in that area that professional 16 conferences are where authors submit papers for review. 17 Papers get accepted. And those papers are presented in 18 person at conference sessions, which are then archived 19 into proceedings that are handed out to each attendee at 20 the conference. 21 So it's not just -- yes, it is my 22 understanding, but it's also a common practice for how 23 IEEE ACM run their conferences. 24 Q And your understanding is not based on you 25 having personally seen every presentation at the DATE	Page 67 1 unequivocally (sic) -- equit -- unequivocally that every 2 paper that has appeared in the proceedings of a 3 conference was presented at the conference in the DATE 4 series, including DATE 2004. So that I can state for 5 sure. Because the way in which conferences are 6 organized, as I've stated in Item 18 of my declaration, 7 authors of accepted papers were required to register and 8 present their papers in person at the conference. And 9 this is a requirement of every IEEE ACM conference that 10 I know of, including the DATE -- and including DATE 11 2004. 12 MR. KRUSIEWICZ: Okay. Let's go off the record 13 if it's okay with you, Counsel. 14 MR. RYPKA: Sure. 15 THE REPORTER: We're off the record at 16 3:08 p.m. Central time. 17 (Recess from 3:08 p.m. to 3:24 p.m.) 18 THE REPORTER: Back on the record at 3:24 p.m. 19 BY MR. KRUSIEWICZ: 20 Q Dr. Dutt, before we took the break, we were 21 discussing Radulescu 2004. Correct? 22 A Correct. 23 Q Specifically we were discussing its inclusion 24 and whether it was included in the DATE 2004 conference 25 proceedings. Correct?
Page 66 1 2004 conference. Correct? 2 MR. RYPKA: Object to form. 3 THE WITNESS: I have organized several 4 conferences myself. And I have had the opportunity to 5 ensure that every single author registered for and 6 presented the paper at the conference in order for that 7 paper to appear in the proceedings. 8 So it's not just my understanding. I've 9 physically been involved in other conferences that are 10 similar to DATE where I was, for example, the general 11 chair for conference where -- IEEE conference. So -- 12 BY MR. KRUSIEWICZ: 13 Q So you can state with certainty that a paper 14 was presented 20 years ago based solely on your 15 understanding of how conferences work? 16 MR. RYPKA: Object to form. 17 THE WITNESS: Could you repeat your question 18 again? 19 BY MR. KRUSIEWICZ: 20 Q You can state with certainty that a paper was 21 presented 20 years ago based solely on your 22 understanding of how conferences work? 23 MR. RYPKA: Same objection. 24 THE WITNESS: I don't know that your statement 25 is completely correct. I can state on --	Page 68 1 MR. RYPKA: Object to form. 2 THE WITNESS: Correct. I -- I mentioned that, 3 as I've indicated in Item 21, that paper has been 4 included in the list of papers in the proceedings from 5 DATE 2004. 6 BY MR. KRUSIEWICZ: 7 Q And you testified earlier that you don't recall 8 personally attending the Radulescu 2004 presentation. 9 Is that right? 10 MR. RYPKA: Object to form. 11 THE WITNESS: It's over 20 years ago. I don't 12 recall which sessions and which papers I attended. I do 13 know that I attended the six papers that I had 14 co-authored. I may have attended that session. I mean, 15 it's been too long. So I don't remember. 16 BY MR. KRUSIEWICZ: 17 Q And you also don't personally -- don't recall 18 personally having reviewed the Radulescu 2004 article 19 prior to being engaged for this declaration. Correct? 20 MR. RYPKA: Object to form. 21 THE WITNESS: Can you restate the question? I 22 didn't get that question. I'm sorry. 23 BY MR. KRUSIEWICZ: 24 Q You don't recall personally having reviewed the 25 Radulescu 2004 article prior to being -- prior to being

Page 69 1 engaged for this matter. Correct? 2 MR. RYPKA: Object to form. 3 THE WITNESS: I may have seen it. Like I said, 4 we work -- I mean, I -- I work in that general area. So 5 it's quite possible that I saw the paper. I -- I did 6 not -- I'm not prepared to answer that question at this 7 time since, you know, I didn't look at that aspect in 8 preparing my declaration. So I don't think I'm prepared 9 to answer the question. 10 BY MR. KRUSIEWICZ: 11 Q You also testified that the paper was for sure 12 presented at the conference. Is that right? 13 MR. RYPKA: Object to form. 14 THE WITNESS: Yes. 15 That is correct. As I indicate in Item 18 of 16 my declaration, authors of accepted papers were required 17 to register and present their papers in person at the 18 conference. And, as I indicated, those papers are 19 included in the list of proceedings. As I seen -- as I 20 indicated in Item 21 of my declaration, that paper 21 authored by Radulescu, et al., is included in this list 22 of proceedings from DATE 2004. 23 BY MR. KRUSIEWICZ: 24 Q And when you say that the Radulescu 2004 was 25 for sure presented, do you mean that it was presented	Page 71 1 papers in person for the papers to appear in the 2 proceedings. So it's -- it's not just my opinion. It's 3 a fact that IEEE ACM require papers to appear. In fact, 4 I -- I do recall instances where papers were taken out 5 of the proceedings if the author did not present -- or 6 if one of the authors -- if the paper was not presented 7 at the conference. So they redact papers retroactively 8 after the conference if a paper is not -- has not 9 appeared. So that happens today as well. So that's a 10 fact. It's not just an opinion of mine. 11 BY MR. KRUSIEWICZ: 12 Q Dr. Dutt, you've authored many papers in your 13 career. Correct? 14 MR. RYPKA: Object to form. Scope. 15 THE WITNESS: Yes. 16 MR. KRUSIEWICZ: I'm introducing what has been 17 marked as Exhibit 2061. 18 (Exhibit 2061 was marked for identification.) 19 BY MR. KRUSIEWICZ: 20 Q Dr. Dutt, please let me know when you have had 21 a chance to open it. 22 A Yes. 23 Q Do you recognize Exhibit 2061? 24 A It appears to be a copy of my C.V., dated 25 December 23, 2022.
Page 70 1 with 100-percent certainty? 2 MR. RYPKA: Object to form. 3 THE WITNESS: As I mentioned in Item 18, 4 authors of accepted papers were required to register and 5 present their papers in person at the conference. So 6 that paper that appeared in the proceedings must have 7 been presented at the conference. Otherwise, it would 8 not appear in the proceedings. 9 BY MR. KRUSIEWICZ: 10 Q And you're 100-percent sure that it was 11 presented at the conference. Correct? 12 MR. RYPKA: Object to form. 13 THE WITNESS: As I indicated in Item 18, every 14 paper that appeared in the proceedings must have been 15 presented at the conference. 16 BY MR. KRUSIEWICZ: 17 Q Is your testimony based on personal 18 observations that it was presented at the conference, or 19 is it your opinion based on your review of the exhibits 20 to your declaration and your general experience that the 21 paper was presented at the conference? 22 MR. RYPKA: Object to form. 23 THE WITNESS: It's based on both my experience 24 in 35 years in the field as well as the fact that IEEE 25 ACM held conferences where attendees must present their	Page 72 1 Q Is this a complete and accurate version of your 2 C.V. as of the time it was created? 3 MR. RYPKA: Object to form. Scope. 4 THE WITNESS: I don't know where this came 5 from. It looks like it's my C.V. I don't know what the 6 provenance of this document that you're showing is. It 7 does appear to be something very similar to something 8 that I -- I hold on my archival website and in my 9 records. But it does look like it's a copy of mine. I 10 don't know if it's been changed or where it's been 11 generated from, but it does appear to be my C.V., yes. 12 Am I sure that it's accurate? I don't know -- 13 as I said, I don't know what the provenance is. So I 14 can't speak to material that I haven't provided. 15 BY MR. KRUSIEWICZ: 16 Q We established that you presented -- you had -- 17 strike that. 18 We established that six of your papers were 19 presented at the DATE 2004 conference. Is that right? 20 MR. RYPKA: Object to form. 21 THE WITNESS: That is correct. As I stated in 22 Item 20 of my declaration, I had six papers that were 23 presented at the DATE 2004 conference, which were also 24 included in the proceedings of the DATE 2004 conference. 25

Page 73 1 BY MR. KRUSIEWICZ: 2 Q On at least some of your academic papers, you 3 have at least one co-author. Is that right? 4 MR. RYPKA: Object to form. Scope. 5 THE WITNESS: Could you repeat the question 6 again? 7 BY MR. KRUSIEWICZ: 8 Q On at least some of your academic papers, you 9 have at least one co-author. Is that right? 10 MR. RYPKA: Same objection. 11 THE WITNESS: Yes. As an academic, I work with 12 many students and many other colleagues. So many of my 13 papers indeed have coauthors. That is correct. 14 BY MR. KRUSIEWICZ: 15 Q That's a pretty typical practice. Is that 16 right? 17 MR. RYPKA: Object to form. 18 THE WITNESS: Can you clarify typical practice 19 in what -- in -- could you specify what -- 20 BY MR. KRUSIEWICZ: 21 Q So it's a pretty typical practice in academia 22 to have many coauthors on articles, papers. Is that 23 right? 24 A It's a very broad statement that you're making. 25 I think it's -- it's a typical practice in my subfield	Page 75 1 MR. RYPKA: Object to form. Scope. 2 THE WITNESS: There have been instances, yes, 3 of some coauthors in my list of 400-plus papers -- I 4 don't know how many papers I have. There -- there may 5 have been a few, but I'd have to go back and look 6 carefully to see which papers and when. 7 I've had -- as I said, I have had coauthors 8 with multiple industries, industry partners. 9 BY MR. KRUSIEWICZ: 10 Q How many papers have you co-authored with 11 Qualcomm employees? 12 MR. RYPKA: Object to form. Scope. 13 THE WITNESS: I'm not prepared to answer the 14 question since I've not looked and done that for this 15 deposition. So I -- I don't think I'm prepared to 16 answer that question without doing further research. 17 BY MR. KRUSIEWICZ: 18 Q Which Qualcomm employees have you co-authored 19 papers with? 20 A Again -- 21 MR. RYPKA: Again, form. Scope. 22 THE WITNESS: As I said, I'd have to go back 23 and do a detailed study to see because I've had -- you 24 know, over my career, I've had over 400-plus papers with 25 multiple authors. Some of them are in industry. Some
Page 74 1 of computer science, but it may not be a practice in all 2 of academia. So I can't speak to anything else out of 3 my area of expertise. 4 In my specific subdiscipline of computing, it 5 is the case that oftentimes articles have multiple 6 authors. 7 Q And sometimes your coauthors are colleagues at 8 the University of California Irvine. Right? 9 MR. RYPKA: Object to form. Scope. 10 THE WITNESS: I'm happy to answer that 11 question. I'm not sure how that relates to my 12 declaration. But in answer to your question, yes, my 13 papers -- my papers often have students, colleagues, not 14 only from UCI but outside of UCI. 15 BY MR. KRUSIEWICZ: 16 Q Sometimes your coauthors are also people in the 17 industry. Is that right? 18 MR. RYPKA: Object to form. 19 THE WITNESS: Again, I'm not sure the relevance 20 to the statement that I've presented. But in answer to 21 your question, yes, sometimes there are coauthors who 22 come from industry. 23 BY MR. KRUSIEWICZ: 24 Q Sometimes your coauthors are Qualcomm 25 employees. Is that right?	Page 76 1 of them are not. So to answer that question, I'd have 2 to go back and do further study. So I don't think I'm 3 prepared to answer that question at this time. 4 MR. KRUSIEWICZ: Introducing what has been 5 marked as Exhibit 2063. 6 (Exhibit 2063 was marked for identification.) 7 BY MR. KRUSIEWICZ: 8 Q Dr. Dutt, please let me know when you have had 9 a chance to open it. 10 A Yes. I have it opened. 11 Q Do you recognize Exhibit 2063? 12 A Yes. 13 Q What is Exhibit 2063? 14 A It's a paper entitled "Software and Hardware 15 Implementation of Lattice-based Cryptography Schemes." 16 Q Are you a co-author of this paper? 17 MR. RYPKA: Object to form. Scope. 18 THE WITNESS: I am a co-author, but I'm not 19 sure where this line of discussion is going and its 20 relevance to my declaration. So I -- I don't know if 21 I'm prepared to answer more questions on this topic 22 unless it's related to my declaration. 23 BY MR. KRUSIEWICZ: 24 Q Is Indranil Banerjee -- Banerjee also a 25 co-author of this declaration -- of this paper? Sorry.

Page 77 1 MR. RYPKA: Object to form. Scope. 2 THE WITNESS: Again, I'm not prepared to answer 3 questions that are outside the scope of my declaration. 4 BY MR. KRUSIEWICZ: 5 Q Are you refusing to answer whether Indranil 6 Banerjee is a co-author of your declaration? 7 A No, I'm -- 8 MR. RYPKA: (Inaudible). 9 THE WITNESS: -- not refusing to answer that. 10 He is a co-author on the exhibit you -- you've shown on 11 the screen. But I'm not prepared to answer further 12 questions that are not related to my declaration. 13 THE REPORTER: And may the reporter hear 14 whether there was an objection with the overlap there. 15 MR. RYPKA: There is. 16 THE REPORTER: Could the reporter hear again, 17 please? 18 MR. RYPKA: Object to form. Scope. 19 THE REPORTER: Thank you. 20 MR. RYPKA: I'm just going to go ahead and say 21 that I object to this line of questioning under form and 22 scope. 23 BY MR. KRUSIEWICZ: 24 Q Is Indranil Banerjee a Qualcomm employee at the 25 time of -- at the time of publication of this paper?	Page 79 1 my declaration. 2 BY MR. KRUSIEWICZ: 3 Q Was Indranil Banerjee a Qualcomm employee at 4 the time of publication of this paper? 5 MR. RYPKA: Object to form. Scope. 6 THE WITNESS: Again, I'm not prepared to talk 7 about things other than the facts in my declaration. 8 BY MR. KRUSIEWICZ: 9 Q Are you refusing to answer whether he or she 10 was an employee of Qualcomm at the time of publication 11 of this paper? 12 MR. RYPKA: Object to form. Scope. 13 THE WITNESS: Again, I'm not prepared to talk 14 today about things other than the facts in my 15 declaration. 16 BY MR. KRUSIEWICZ: 17 Q So just to be clear, you're refusing to answer. 18 Correct? 19 MR. RYPKA: Object to form. Scope. 20 THE WITNESS: I'm not prepared to talk about 21 things other than the facts in my declaration. 22 BY MR. KRUSIEWICZ: 23 Q Was Rosario Cammarota a Qualcomm employee at 24 the time of publication of this paper? 25 MR. RYPKA: Object to form. Scope.
Page 78 1 MR. RYPKA: Object to form. Scope. 2 THE WITNESS: Again, I'm not prepared to answer 3 questions for which I've not researched and that are not 4 in the scope of my declaration. 5 BY MR. KRUSIEWICZ: 6 Q Dr. Dutt, could you please turn to page 2 of 7 Exhibit 2063. 8 A Yes. 9 Q The seventh line from the top, do you see the 10 name Indranil Banerjee? 11 MR. RYPKA: Object to form. Scope. 12 THE WITNESS: Yes, I see the name. But, again, 13 I'm not comfortable with this line of questioning since 14 it's not related to my deposition -- sorry -- to my 15 declaration, to the material that's in my declaration. 16 So I'd like to focus the questions to articles that are 17 within my declaration. I'm not prepared to answer 18 questions that are outside of items in my declaration. 19 BY MR. KRUSIEWICZ: 20 Q Just to be clear, you're refusing to answer 21 questions regarding Exhibit 2063? 22 MR. RYPKA: Object to form. 23 THE WITNESS: I'm not refusing to answer the 24 questions. I'm refusing to answer questions for which 25 I've not prepared that are questions outside of items in	Page 80 1 THE WITNESS: I'm not prepared today to talk 2 about things other than the facts in my declaration. 3 BY MR. KRUSIEWICZ: 4 Q Just to be clear, you're refusing to answer the 5 question? 6 MR. RYPKA: Object to form. Scope. 7 THE WITNESS: I'm not prepared today to talk 8 about things other than the facts in my declaration. 9 BY MR. KRUSIEWICZ: 10 Q Dr. Dutt, you do not have an electrical 11 engineering degree. Is that correct? 12 MR. RYPKA: Object to form. 13 THE WITNESS: Can you rephrase that question 14 again? 15 BY MR. KRUSIEWICZ: 16 Q Do you have a -- do you have a degree in 17 electrical engineering? 18 A I do not have a degree in electrical 19 engineering. As I state in my declaration, I hold a 20 bachelor of engineering in mechanical engineering and 21 then M.S. in computer science and a Ph.D. in computer 22 science from the University of Illinois and Urbana 23 Champaign in 1989, as I list in Item 2 of my 24 declaration. 25 Q Are you familiar with a system on a chip?

Page 81 1 MR. RYPKA: Object to form. Scope. 2 THE WITNESS: Yes, I -- I know what a system on 3 chip is, but, again, I'm not certain I understand the 4 relevance with respect to my declaration. 5 BY MR. KRUSIEWICZ: 6 Q What is a system on a chip? 7 MR. RYPKA: Object to form. Scope. 8 THE WITNESS: I'd have to go back and prepare 9 and do some work to answer that question in detail. So 10 I don't think I'm prepared at this time to discuss 11 things again that are outside the scope of my 12 declaration. 13 BY MR. KRUSIEWICZ: 14 Q Just to be clear, you're refusing to answer as 15 to your understanding of what a system on a chip is? 16 MR. RYPKA: Object to form. Scope. 17 THE WITNESS: I haven't talked enough about it 18 to be able to speak about it today. So I'm not prepared 19 to talk about things other than the items that are in my 20 declaration. 21 BY MR. KRUSIEWICZ: 22 Q Are you familiar with a network on a chip? 23 MR. RYPKA: Object to form. Scope. 24 THE WITNESS: Again, I am familiar with network 25 on a chip. I've worked on topics like that for many	Page 83 1 THE WITNESS: Again, I'd have to go back and 2 look at my C.V. and research if and when and what 3 projects I've worked on since I've had a fairly long 4 career in this area. So I don't think I'm prepared to 5 answer that question at this time. 6 BY MR. KRUSIEWICZ: 7 Q Sitting here today, you don't know whether 8 you've worked on a system on a chip? 9 MR. RYPKA: Object to form. Scope. 10 THE WITNESS: Again, like I've mentioned, I've 11 worked on many topics in my career over 35 years. I'd 12 have to go back and see -- because this is a deposition, 13 I wanted to be accurate in what I say. So I want to be 14 able to go back and see exactly what kinds of engagement 15 I had. And I don't think I'm prepared to answer that 16 line of questioning today in this deposition. 17 BY MR. KRUSIEWICZ: 18 Q So would it be fair to say that you do not 19 recall working on a system on a chip sitting here today? 20 A Again -- 21 MR. RYPKA: Again, form and scope. 22 THE WITNESS: Sorry. I haven't prepared for 23 things outside of my declaration. So I'm not prepared 24 to talk about things that are outside the scope of my 25 declaration today.
Page 82 1 years but haven't thought enough about it to be able to 2 speak about it today at this deposition. 3 BY MR. KRUSIEWICZ: 4 Q Do you have any experience with SOC design? 5 MR. RYPKA: Object to form. Scope. 6 THE WITNESS: Can you rephrase -- can you 7 repeat the question? 8 BY MR. KRUSIEWICZ: 9 Q Do you have any experience designing a system 10 on a chip? 11 MR. RYPKA: Object to form. Scope. 12 THE WITNESS: Have I -- have I physically 13 designed a chip myself? Is that the question? 14 BY MR. KRUSIEWICZ: 15 Q Do you have any industry experience with system 16 on a chip design? 17 MR. RYPKA: Object to form. Scope. 18 THE WITNESS: I'd have to go back and look up 19 my resume in detail to see if I've had engagements on 20 that. So I don't think I'm prepared to answer that 21 question at this time. 22 BY MR. KRUSIEWICZ: 23 Q You don't recall whether you've had any 24 experience designing a system on a chip? 25 MR. RYPKA: Object to form. Scope.	Page 84 1 BY MR. KRUSIEWICZ: 2 Q How many years of experience as of 2004? 3 MR. RYPKA: Object to form. 4 THE WITNESS: Can you repeated the question? 5 BY MR. KRUSIEWICZ: 6 Q How many years of experience do you have with 7 SOC design as of 2004? 8 MR. RYPKA: Object to form. Scope. 9 THE WITNESS: Again, I'd have to go back and 10 review my C.V. in more detail. I worked on multiple 11 topics during my academic career. So at this 12 deposition, I'm not prepared to speak about things other 13 than the facts in my declaration. 14 BY MR. KRUSIEWICZ: 15 Q Are you familiar with large scale networks? 16 MR. RYPKA: Object to form. Scope. 17 THE WITNESS: Certainly I've heard of that 18 phrase. But I don't think I'm prepared to discuss 19 anything about that in detail since I haven't prepared 20 for it for this deposition. 21 BY MR. KRUSIEWICZ: 22 Q As a professor, would it be fair to say that 23 you do a lot of research? 24 MR. RYPKA: Object to form. Scope. 25 THE WITNESS: Yes.

Page 85 1 BY MR. KRUSIEWICZ: 2 Q How is that research funded? 3 MR. RYPKA: Object to form. Scope. 4 THE WITNESS: That's a broad question. You 5 know, we have research that come from multiple -- excuse 6 me -- multiple sources. But in -- with regard to this 7 specific deposition, I'm not sure how relevant that 8 question is. So I don't think I'm prepared to answer 9 questions that are outside the scope of my declaration. 10 BY MR. KRUSIEWICZ: 11 Q Is some of your research funded through the 12 industry? 13 MR. RYPKA: Object to form. Scope. 14 THE WITNESS: Yes. My research is indeed 15 funded by multiple sources. But, again, I object to 16 things that are being asked outside the scope of my 17 declaration. I don't see how it's relevant to my 18 declaration. 19 BY MR. KRUSIEWICZ: 20 Q Did you ever receive any research grants from 21 Qualcomm? 22 MR. RYPKA: Object to form. Scope. 23 THE WITNESS: Yes. I -- I have received 24 research grants from multiple companies, including 25 Qualcomm. Exact dates, et cetera, I would have to go	Page 87 1 A That's what is listed, yes. 2 Q And do you see that you received an 3 unrestricted research gift from Qualcomm, Inc., totaling 4 \$60,000? 5 A Yes. 6 Q And that was in September of 2015. Right? 7 A Yes. 8 Q So would it be fair to say that you received 9 unrestricted research gifts totaling \$200,000 from 10 Qualcomm, Inc.? 11 A Yes. 12 Q Were there any conditions for these grants? 13 A So as you can see from what's shown there, it's 14 an unrestricted research gift. And by university 15 mechanisms, a gift from any organization should have no 16 deliverables, no expectations and it's completely a gift 17 that's tax deductible for the donating company or 18 individual institution with no expectation of any form 19 of services or engagement, which is why it's called an 20 unrestricted research gift. 21 Q Did you apply for these unrestricted research 22 gifts? 23 A In general, unrestricted research gifts are not 24 done by application. They are given by companies in 25 recognition of faculty member's work.
Page 86 1 back and research. 2 BY MR. KRUSIEWICZ: 3 Q Do you know how much you received from Qualcomm 4 in research grants? 5 A I can't speak to that because I'd have to go 6 back and do research on that. I have not prepared for 7 that -- for this deposition. 8 Q Dr. Dutt, can we please -- can you refer to 9 page 32 of Exhibit 2061 and please let me know when 10 you're there. 11 A I'm sorry. Which exhibit again? 12 Q 2061. 13 MR. RYPKA: What was the page? 14 MR. KRUSIEWICZ: Page 32. 15 THE WITNESS: Yes, I'm there. 16 BY MR. KRUSIEWICZ: 17 Q Do you see that you received an unrestricted 18 research gift from Qualcomm, Inc., totaling \$100,000? 19 A Yes. 20 Q And that was in December of 2017. Correct? 21 A That's what it shows here, yes. 22 Q Do you see that you received an unrestricted 23 research gift from Qualcomm, Inc., totaling \$140,000? 24 A Yes. 25 Q And that was on August of 2016. Correct?	Page 88 1 Q Under what circumstances did Qualcomm give you 2 these research gifts? 3 A Could you clarify what do you mean by "under 4 what circumstances." It's an unrestricted research 5 gift. So they just give the gift, and that's it. 6 There's no expectation of services or anything else. 7 So -- 8 Q What is -- 9 THE REPORTER: I'm sorry. With the overlap, if 10 there was more to the answer after "There's no 11 expectation of services or anything else," I would need 12 to hear again. 13 THE WITNESS: I'm sorry. I'm not sure who the 14 question was for, Maggie. 15 THE REPORTER: For the witness. Dr. Dutt, if 16 there was more to the answer with the overlap that 17 occurred, then this is the time to allow the reporter to 18 hear again, please. 19 THE WITNESS: Oh. I was just saying that 20 unrestricted research gifts are -- are given in 21 recognition of faculty members' potential or work on a 22 topic. And there's no expectation of any services or 23 any contractual obligation thereof. 24 BY MR. KRUSIEWICZ: 25 Q How did it come about that Qualcomm gave you

Page 89 1 these research gifts? 2 MR. RYPKA: Objection. Form. 3 THE WITNESS: So if you see item -- at the 4 bottom of the page, there is SRC, semi-conductor 5 research corporation, which is a consortium of multiple 6 industries that fund -- that funds researchers. Many 7 industries contribute to this consortium and fund 8 research. And through that network, I assume that they 9 found work that I was doing that was interesting and 10 therefore they decided to give a set of research gifts. 11 BY MR. KRUSIEWICZ: 12 Q Did you ever communicate with employees of 13 Qualcomm regarding these research gifts? 14 A Again, I'm not sure I understand the question 15 clearly. But in order to receive a research gift, you 16 have to communicate with someone at Qualcomm so that 17 they can process the research gift. So exactly who, 18 why, I'd have to go back and research. But, yes, some 19 individual at the donating company contacts the faculty 20 member to say we'd like to give you an unrestricted gift 21 of X dollars. 22 Q Did you receive any unrestricted research gifts 23 from Qualcomm this year? 24 A Not to the best of my knowledge, but I have to 25 go back and look.	Page 91 1 any of your technology? 2 A No. 3 Q Did you ever meet with Qualcomm to discuss 4 Qualcomm internal projects? 5 A No. 6 MR. RYPKA: Object to form. Scope. 7 THE WITNESS: No. 8 BY MR. KRUSIEWICZ: 9 Q Have you ever had any visiting researchers from 10 Qualcomm? 11 A I'd have to go back and look at my resume in -- 12 in more detail. We had several graduates of our program 13 join industry and switch companies, and we haven't been 14 tracking with us over the years. So I -- I don't have a 15 definitive answer on that at this point. I'd have to 16 research that. 17 Q Did any -- 18 A I just want to add that -- that our graduates 19 do enter companies. And as you know, they switch 20 companies. So our interactions continue for many years 21 after their graduation as well. 22 Q Did any Qualcomm employee go to the DATE 2004 23 conference? 24 MR. RYPKA: Objection to form. Scope. 25 THE WITNESS: I have -- you know, that's
Page 90 1 Q Did you receive any unrestricted research gifts 2 from Qualcomm in 2023? 3 A I'd have to go back and look, but I don't think 4 so. But I'd have to go back and look. Again, I have 5 not prepared for that set of questions. I'd have to 6 look at my most recent C.V. and -- and let you know. 7 But I don't think so, but I'm not sure. I'd have to go 8 back and look. 9 Q Did you ever meet with Qualcomm to discuss your 10 research projects? 11 A Can you be more specific about a timeline or -- 12 because I talked to many industries as part of my job as 13 a faculty member is to promote our research with many 14 industries through organizations such as the SRC. And 15 Qualcomm and many other companies are members of the 16 SRC. So on many occasions, I've talked to many 17 different companies. So very likely that I've talked to 18 members of Qualcomm as well through the SRC. 19 Is that your question? I'm not sure I 20 understand the question clearly. And I don't know what 21 timeline. So, again, I -- you know, I'd have to go back 22 and search and see to be specific. To give a legally 23 correct answer, I'd have to go back to see what dates 24 and what engagements. 25 Q Did you ever grant Qualcomm the license to use	Page 92 1 something that I have no idea because, you know, there 2 were over 500 attendees as I mentioned in my 3 declaration. I don't know who attended. And I do know 4 that I attended. I do know that some of my students 5 attended. Exactly who, I don't remember. But I know we 6 presented those papers. But I can't remember if there 7 was -- I don't even though if Qualcomm was in existence 8 then. I have no idea. Maybe it was. 9 THE REPORTER: I'm sorry. Can I hear the last 10 sentence again, please. 11 THE WITNESS: Maybe it was. I don't have 12 information on that. 13 BY MR. KRUSIEWICZ: 14 Q Who is your contact at Qualcomm regarding the 15 unrestricted research gifts? 16 A I'd have to go back and -- and check again 17 because they change companies quite often. I don't have 18 that information at my finger tips at this point. 19 Q When were you initially contacted in connection 20 with this proceeding? 21 A I'm sorry. What proceedings? I'm sorry. 22 MR. RYPKA: Objection to form. 23 THE WITNESS: I'm sorry. I don't understand 24 the question. What proceedings are we talking about? 25

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1 BY MR. KRUSIEWICZ:

2 **Q When were you initially contacted in connection**

3 **with this Inter Partes review proceeding?**

4 A I was contacted by the counsel probably over

5 about -- about a year ago. I'd have to go back and look

6 at the dates. But about a year ago I'm guessing.

7 **Q Is that counsel for Qualcomm?**

8 A That's correct. Carlson Caspers. I was

9 contacted by Carlson Caspers. That's correct, yes.

10 **Q And who retained you for this case?**

11 A Carlson Caspers contacted me and retained me.

12 **Q Who did you communicate with at Carlson**

13 **Caspers?**

14 A Primarily Mr. Louwague and Mr. Kohlhepp. I

15 think in my first meeting I may have met Mr. Rypka as

16 well. But I've been in contact primarily with Mr. Cope

17 and Mr. Louwague. I hope I'm saying that right.

18 Louwague. Is that -- is that correct pronunciation?

19 MR. RYPKA: Sounds right to me.

20 THE WITNESS: Okay.

21 BY MR. KRUSIEWICZ:

22 **Q In paragraph 4 of your declaration -- so that's**

23 **Exhibit 1012 -- you state you are being compensated at**

24 **\$500 per hour.**

25 **Who is paying your invoices?**

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1 A My invoice, Carlson Caspers for my time and for

2 my time on this consulting engagement.

3 **Q In paragraph 1 of your declaration, you say "I**

4 **make this declaration at the request of Qualcomm**

5 **Incorporated."**

6 **Do you see that?**

7 A I see that statement.

8 **Q Is this statement accurate?**

9 A As I mentioned, I factually gave input to Items

10 2 through 23 of the declaration. And I worked with

11 counsel to draft a final version of this declaration

12 since I'm not familiar with legalese.

13 So the first item, I would assume we worked

14 together with counsel to come up with a legal framing of

15 this declaration.

16 **Q Who at Qualcomm requested that you prepare this**

17 **deposition?**

18 A I have no idea. I have not had any interaction

19 with Qualcomm on this topic. My only interactions have

20 been with my counsel at Carlson Caspers.

21 **Q Have you previously been retained by Qualcomm**

22 **in other matters?**

23 MR. RYPKA: Objection to form. Scope.

24 THE WITNESS: I have not.

25

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1 BY MR. KRUSIEWICZ:

2 **Q Have you ever been retained previously by**

3 **Carlson Caspers in other matters?**

4 MR. RYPKA: Objection to form. Scope.

5 THE WITNESS: I have not.

6 BY MR. KRUSIEWICZ:

7 **Q Have you ever worked for Qualcomm?**

8 A I have not.

9 **Q Have you ever consulted for Qualcomm?**

10 A I have not.

11 MR. KRUSIEWICZ: Okay. Counsel, let's go off

12 the record and --

13 MR. RYPKA: Okay.

14 THE REPORTER: We are off the record at

15 4:00 p.m. eastern time.

16 (Recess from 4:00 p.m. to 4:19 p.m.)

17 THE REPORTER: Back on the record at

18 4:19 a.m. -- p.m.

19 BY MR. KRUSIEWICZ:

20 **Q Dr. Dutt, let me turn your attention to**

21 **Exhibit 2063. Let me know when you have it accessible.**

22 A Yes, I have it in front of me.

23 **Q You are co-author of this paper. Correct?**

24 MR. RYPKA: Object to form. Scope.

25 THE WITNESS: Yes.

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1 BY MR. KRUSIEWICZ:

2 **Q You have five other co-authors on this paper.**

3 **Correct?**

4 MR. RYPKA: Object to form. Scope.

5 THE WITNESS: Yes.

6 BY MR. KRUSIEWICZ:

7 **Q Indranil Banerjee is one of the coauthors of**

8 **this paper. Correct?**

9 MR. RYPKA: Object to form. Scope.

10 THE WITNESS: Yes. But, again, I question this

11 line of questioning and its relevance to the statement

12 that I made in my declaration.

13 BY MR. KRUSIEWICZ:

14 **Q Did Indranil Banerjee work at Qualcomm when you**

15 **co-authored this publication together? Yes or no?**

16 MR. RYPKA: Object to form.

17 You can answer if you know.

18 THE WITNESS: From what's listed on the paper,

19 it appears Indranil Banerjee was affiliated with

20 Qualcomm Technologies at that time.

21 BY MR. KRUSIEWICZ:

22 **Q Rosario Cammarota is also a co-author of this**

23 **paper. Correct?**

24 MR. RYPKA: Object to form.

25 You can answer if you can.

Page 97 1 THE WITNESS: Yes. 2 BY MR. KRUSIEWICZ: 3 Q Rosario Cammarota at the time that you both 4 co-authored this paper worked at Qualcomm. Correct? 5 MR. RYPKA: Object to form. Scope. 6 You can answer if you can. 7 THE WITNESS: Yes, as shown in that paper, his 8 affiliation is listed as Qualcomm Technologies 9 incorporated. 10 BY MR. KRUSIEWICZ: 11 Q Dr. Dutt, we established that you received 12 research gifts from Qualcomm. Correct? 13 MR. RYPKA: Object to the form. 14 You can answer. 15 THE WITNESS: Yes, I have received research 16 gifts from Qualcomm, as I have from many other companies 17 during my long academic career. 18 BY MR. KRUSIEWICZ: 19 Q Was this paper, Exhibit 2063, supported by a 20 gift from Qualcomm? 21 MR. RYPKA: Object to form. 22 THE WITNESS: As we discussed before, 23 unrestricted gifts have no expectations of deliverables 24 or requirements for publication or otherwise. It's an 25 organic process of interactions with industry members.	Page 99 1 You can answer if you can. 2 THE WITNESS: Sorry. Are we talking about 3 2063? 4 BY MR. KRUSIEWICZ: 5 Q Correct. Exhibit 2063, page 2, in the 6 footnotes, it says, quote, "This work was supported in 7 part with a gift from Qualcomm Research." 8 Do you see that? 9 A Yes. 10 MR. KRUSIEWICZ: Okay. Before we finish this 11 deposition, I just want to address on the record the 12 corrections that were provided to us at the beginning of 13 the deposition. 14 Based on our review, we understand that these 15 edits are only changing the cited pages and not 16 substantively changing or adding to the citations. 17 We believe the proper mechanism for Petitioner 18 to enter these corrections is to request authorization 19 to file a corrected version of Exhibit 1012, which, 20 based on our understanding of the issues, we would not 21 oppose. 22 So we wanted to get this on the record and are 23 happy to discuss further off the record. 24 MR. RYPKA: Thank you. 25 MR. KRUSIEWICZ: With that being said, I pass
Page 98 1 So there's no quo -- quid pro quo for -- expected and 2 should not be for any gifts that are given to 3 universities. 4 MR. KRUSIEWICZ: I'm moving to strike as 5 nonresponsive. 6 BY MR. KRUSIEWICZ: 7 Q Dr. Dutt, was this paper, Exhibit 2063, 8 supported by a gift from Qualcomm? 9 MR. RYPKA: Object to form. Asked and 10 answered, again, I -- you know, I -- I'd have to go back 11 and see. When you say supported by, that means was the 12 salary of any of these employees supported by Qualcomm. 13 I -- I -- you know, maybe the Qualcomm employees. But 14 for the university employees, I -- I don't know the 15 answer. I'd have to go back and check. 16 BY MR. KRUSIEWICZ: 17 Q Dr. Dutt, let me refer you to page 2 of 18 Exhibit 2063. Please let me know when you're there. 19 A Yes. 20 Q In the footnote under "Introduction," it says 21 "This work was supported in part with a gift from 22 Qualcomm Research." 23 Do you see that? 24 A Page 2? 25 MR. RYPKA: Object to form. Scope.	Page 100 1 the witness. 2 MR. RYPKA: Could we go off the record for -- 3 MR. KRUSIEWICZ: Yeah. 4 THE REPORTER: We're off the record at 5 4:25 p.m. 6 (Recess from 4:25 p.m. to 4:28 p.m.) 7 THE REPORTER: Back on the record at 4:28 p.m. 8 MR. RYPKA: No questions from us, but we 9 reserve the right to read and sign. 10 THE REPORTER: If there's nothing further 11 before going off, asking both counsel whether you are 12 ordering a rough or an expedite? 13 MR. KRUSIEWICZ: I'm pretty sure that we 14 already ordered a rough, no expedite. So that should be 15 in the order already. 16 THE REPORTER: Thank you. 17 And, Mr. Rypka, same for you? 18 MR. RYPKA: We don't need anything. 19 THE REPORTER: Okay. No rough and no expedite? 20 MR. RYPKA: Yeah, but we will have to read and 21 sign, obviously. 22 THE REPORTER: Right. Okay. We are going off 23 the record. 24 (The proceedings concluded at 4:28 p.m. EDT) 25

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1 I, the undersigned, a Certified Shorthand Reporter of
2 the State of California, do hereby certify:
3 That the foregoing proceedings were taken before me
4 at the time and place herein set forth; that any
5 witnesses in the foregoing proceedings, prior to
6 testifying, were duly sworn; that a record of the
7 proceedings was made by me using machine shorthand,
8 which was thereafter transcribed under my direction;
9 that the foregoing transcript is a true record of the
10 testimony given.
11 Further, that if the foregoing pertains to the
12 original transcript of a deposition in a federal case,
13 before completion of the proceedings, review of the
14 transcript (X) was () was not requested.
15 I further certify I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney or party to this action.
18 IN WITNESS WHEREOF, I have this date subscribed
19 by name.
20 Dated: 09/09/2024
21 
22 _____
23 Margaret A. Smith
24 RPR, CRR, CSR No. 9733
25

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1 DECLARATION UNDER PENALTY OF PERJURY
2 Case Name: Qualcomm vs.
3 Network System Technologies [IPR2024-00343]
4 Date of Deposition: 08/27/2024
5 Job No.: 10147599
6 I, NIKIL DUTT, PH.D., 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 NIKIL DUTT, PH.D.
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

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1 DEPOSITION ERRATA SHEET
2 Case Name: Qualcomm vs.
3 Network System Technologies [IPR2024-00343]
4 Name of Witness: Nikil Dutt, Ph.D.
5 Date of Deposition: 08/27/2024
6 Job No.: 10147599
7 Reason Codes: 1. To clarify the record.
8 2. To conform to the facts.
9 3. To correct transcription errors.
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 _____
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24 Page _____ Line _____ Reason _____
25 From _____ to _____

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1 DEPOSITION ERRATA SHEET
2 Page _____ Line _____ Reason _____
3 From _____ to _____
4 Page _____ Line _____ Reason _____
5 From _____ to _____
6 Page _____ Line _____ Reason _____
7 From _____ to _____
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13 From _____ to _____
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15 From _____ to _____
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17 From _____ to _____
18 Page _____ Line _____ Reason _____
19 From _____ to _____
20 Page _____ Line _____ Reason _____
21 From _____ to _____
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.
26 _____
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DECLARATION UNDER PENALTY OF PERJURY

Case Name: Qualcomm vs.
Network System Technologies [IPR2024-00343]
Date of Deposition: 08/27/2024

Job No.: 10147599

I, NIKIL DUTT, PH.D., hereby certify
under penalty of perjury under the laws of the State of
California that the foregoing is true and correct.

Executed this 19th day of
September, 2024, at Irvine, CA.



NIKIL DUTT, PH.D.

NOTARIZATION (If Required)

State of _____

County of _____

Subscribed and sworn to (or affirmed) before me on
this _____ day of _____, 20____,
by _____, proved to me on the
basis of satisfactory evidence to be the person
who appeared before me.

Signature: _____ (Seal)

DEPOSITION ERRATA SHEET

Case Name: Qualcomm vs.

Network System Technologies [IPR2024-00343]

Name of Witness: Nikil Dutt, Ph.D.

Date of Deposition: 08/27/2024

Job No.: 10147599

Reason Codes: 1. To clarify the record.
 2. To conform to the facts.
 3. To correct transcription errors.

1. Page 12 Line 2. Reason: 3
From "graphs" to "drafts"
2. Page 15 Line 6. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
3. Page 18 Line 13. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
4. Page 25 Line 1. Reason: 2
From "sessions" to "papers"
5. Page 26 Line 5. Reason: 3
From "presented" to "presenting"
6. Page 31 Line 9. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
7. Page 39 Line 19. Reason: 3
From "copyright" to "copyrighted"
8. Page 39 Line 19. Reason: 3
From "profession" to "professional"
9. Page 39 Line 19. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
10. Page 40 Line 6. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
11. Page 40 Line 7. Reason: 3
From "copyright" to "copyrighted"
12. Page 40 Line 7. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
13. Page 43 Line 3. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
14. Page 43 Line 14. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
15. Page 43 Line 23. Reason: 3
From "IEEE ACM" to "IEEE and ACM"

16. Page 53 Line 9. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
17. Page 63 Line 1. Reason: 3
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18. Page 63 Line 6. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
19. Page 63 Line 16. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
20. Page 63 Line 18. Reason: 3
From "people" to "paper"
21. Page 63 Line 19. Reason: 3
From "day" to "DATE"
22. Page 64 Line 22. Reason: 3
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23. Page 65 Line 12. Reason: 3
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24. Page 65 Line 23. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
25. Page 67 Line 9. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
26. Page 70 Line 24. Reason: 3
From "IEEE" to "IEEE and"
27. Page 71 Line 3. Reason: 3
From "IEEE ACM" to "IEEE and ACM"
28. Page 81 Line 17. Reason: 3
From "talked" to "thought"
29. Page 93 Line 14. Reason: 3
From "Louwage" to "Louwagie"
30. Page 93 Line 16. Reason: 3
From "Cope" to "Kohlhepp"
31. Page 93 Line 17. Reason: 3
From "Louwage" to "Louwagie"
32. Page 93 Line 18. Reason: 3
From "Louwage" to "Louwagie"

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



Date: 9/19/2024

Nikil Dutt, Ph.D.