Deposition of

Nikil Dutt, Ph.D.

February 25, 2025

Volume I

Qualcomm

vs.

Network System Technologies

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UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INCORPORATED,
Petitioner,
vs.
NETWORK SYSTEM TECHNOLOGIES, LLC,
Patent Owner.

IPR NO. 2024-00338
U.S. PATENT
NO. 7,373,449
IPR NO. 2024-00343
U.S. PATENT
NO. 7,594,052

REMOTE DEPOSITION OF NIKIL DUTT, PH.D.
Tuesday, February 25, 2025
Volume I

Reported by:
CHERYL R. KAMALSKI
Certified Shorthand Reporter No. 7113
Job No. 10158459

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Remote Deposition of NIKIL DUTT, PH.D., Volume I, taken on behalf of Patent Owner, with everyone appearing at their remote addresses, beginning at 8:57 a.m. and ending at 3:42 p.m., on Tuesday, February 25, 2025, before Cheryl R. Kamalski, Certified Shorthand Reporter No. 7113.

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(None)

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1 Tuesday, February 25, 2025
2 8:57 a.m.
3
4 THE STENOGRAPHIC REPORTER: My name is Cheryl
5 Kamalski. I'm a California licensed stenographer,
6 No. 7113.
7
8 NIKIL DUTT, PH.D.,
9 having been administered an oath, was examined and
10 testified as follows:
11
12 EXAMINATION
13 BY MR. HOLT:
14 **Q Dr. Dutt, will you please state your full name**
15 **for the record.**
16 A Sure. Nikil Dutt.
17 **Q Thank you. And, Dr. Dutt, you have been deposed**
18 **before, correct?**
19 A Yes.
20 **Q Were you deposed based on your testimony as an**
21 **expert witness or a lay witness?**
22 MR. KOHLHEPP: Object to form.
23 THE WITNESS: I don't understand the terms, but I
24 did -- I was deposed in relation to the IPRs that we're
25 discussing today --

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1 BY MR. HOLT:
2 **Q And --**
3 A -- for which I'm providing a reply declaration.
4 **Q Understood. So I understand you were deposed**
5 **previously by my colleague, Peter. But even though you**
6 **have been deposed before, I still want to just cover**
7 **some basic ground rules as a refresher, you know, so**
8 **that we are on the same page, especially given the fact**
9 **that this deposition is remote. Okay?**
10 A Yes.
11 **Q First off, please let me know if you need to take**
12 **a break at any point, and we'll take a break as soon as**
13 **possible based on where we're at in the particular line**
14 **of questioning. Okay?**
15 A Yes.
16 **Q And the court reporter is here today to record**
17 **what we're saying. And -- and I see you've -- you**
18 **nodded. So I just want to note that -- to -- for you to**
19 **please answer each question with a -- with a clear**
20 **verbal response so that the court reporter can record**
21 **your responses. Okay?**
22 A Yes.
23 **Q And you are entitled to fair, clear questions.**
24 **So if you do not understand one of my questions for any**
25 **reason, please say so, and I can repeat the question or,**

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1 **if need be, I can do my best to rephrase it. Okay?**
2 A Yes.
3 **Q Your attorney may make objections today. If he**
4 **does, you are still obligated to answer the question**
5 **unless your attorney specifically instructs you not to**
6 **answer the question. Okay?**
7 A Yes.
8 **Q Do you understand that your testimony will be**
9 **under oath and that you must answer truthfully?**
10 A Yes.
11 **Q And is there any reason why you cannot testify**
12 **truthfully or accurately today?**
13 A No.
14 **Q Okay. So because this deposition is remote, I**
15 **want to ask, where are you located physically for**
16 **today's deposition, Dr. Dutt?**
17 A I'm currently in my home office in Irvine,
18 California.
19 **Q And is anyone else in the room with you?**
20 A No.
21 **Q Did you bring any documents to the deposition**
22 **with you?**
23 A Yes. I printed a copy of each declaration that
24 we're going to discuss today. The first one is
25 Exhibit 1038, which is a reply declaration, and the

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1 second one is Exhibit 1044, which is a reply declaration
2 as well.
3 **Q Are there any markings on those printed**
4 **documents?**
5 A No.
6 **Q And you don't have any other documents with you**
7 **today?**
8 A No.
9 **Q So I will be introducing and pointing you to some**
10 **documents during the course of today's deposition, and**
11 **we can do that through the Zoom platform we're using.**
12 **But otherwise, besides the exhibits I'm presenting to**
13 **you today, you're not permitted to consult any other**
14 **documents or people or sources during the deposition.**
15 **Do you understand that?**
16 A Yes, I understand.
17 **Q Okay. So starting off, I just want to get some**
18 **background information so that we understand the -- the**
19 **context of today's deposition.**
20 **You understand that you are here to testify**
21 **regarding declarations you prepared in connection with**
22 **two proceedings involving Qualcomm and Network System**
23 **Technologies, specifically IPR 2024-00338 and**
24 **IPR 2024-00343, correct?**
25 A Yes.

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1 Q So during this deposition, I may refer to those
2 two proceedings as the "-338 IPR" or the "-343 IPR."
3 Okay?
4 A Okay.
5 Q Dr. Dutt, I have just uploaded a document that
6 has previously been marked as Exhibit 1044 in
7 the -338 IPR, which is your reply declaration in that
8 proceeding, correct?
9 A Yes. That's correct.
10 Q And if you go to the last page, 11, it shows that
11 this reply declaration, that was premarked as
12 Exhibit 1044 in the -338 IPR -- that it was signed by
13 you on January 24th, 2025, correct?
14 A Yes.
15 Q So during today's deposition, when I refer to
16 "your -338 declaration" or "Exhibit 1044," I'm referring
17 to this exhibit, okay?
18 A Yes.
19 Q Dr. Dutt, I've now just uploaded another document
20 which has been previously marked as Exhibit 1012 in
21 the -343 IPR, which is your first declaration in that
22 proceeding, correct?
23 A Yes. That's correct.
24 Q If you go to page 7 of that document, it shows
25 that this Exhibit 1012 in the -343 IPR was signed by you

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1 on December 5th, 2023, correct?
2 A Yes.
3 Q So during today's deposition, whenever I refer to
4 "your first -343 declaration," I'll be referring to this
5 exhibit. Okay?
6 A Yes.
7 Q And now I've uploaded another document. This one
8 was previously marked as Exhibit 1038 in the -343 IPR.
9 And this is your reply declaration in that proceeding,
10 correct?
11 A Yes, that's correct.
12 Q And if you go to the last page, 14, it shows that
13 this reply declaration marked as Exhibit 1038 in
14 the -343 IPR was signed by you on January 17th, 2025,
15 correct?
16 A Yes.
17 Q Okay. And so today, whenever I refer to "your
18 second -343 declaration," I'll be referring to this
19 document. Okay?
20 A Okay.
21 Q And you'll see, as well, that I've included in
22 the file names indicators of the shorthand references
23 for these documents for convenience.
24 A Yes.
25 Q Dr. Dutt, I've now uploaded another document.

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1 This one was previously marked as Exhibit 2067 in
2 the -343 IPR. And this is a transcript of your first
3 deposition in that proceeding, which occurred on
4 August 27th, 2024. Do you see that?
5 A Yes.
6 Q And I'll represent to you that Patent Owner
7 intends to use the same Exhibit No. 2067 for this
8 exhibit in the -338 IPR.
9 So during this deposition today, whenever I refer
10 to "your first deposition" or "your prior deposition" or
11 "Exhibit 2067," I'm referring to this deposition
12 transcript. Okay?
13 A Yes.
14 Q Okay. Dr. Dutt, did you do anything to prepare
15 for today's deposition?
16 A I reviewed my declarations and I also reviewed
17 the exhibits that are referred to in the declarations.
18 Q Approximately how long did you spend preparing
19 for today's deposition?
20 A A couple of hours.
21 Q A couple of hours, meaning two to three hours?
22 A Yeah, I would say between two to four hours.
23 There were two separate declarations, so approximately
24 about two hours each, perhaps, give or take.
25 Q Did you meet with anyone in preparing for your

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1 deposition today?
2 A I did meet with counsel.
3 Q And what was counsels' names that you met with?
4 A Peter Kohlhepp.
5 Q Dr. Dutt, when were you first asked to prepare
6 your -338 declaration?
7 A This is the newer declaration, correct?
8 Q The -338 declaration is the only declaration you
9 have submitted in the -338 IPR.
10 A I'd have to go back and look, but probably
11 sometime beginning of this year or end of last year.
12 Something like that.
13 Q During your preparation of the -338 declaration,
14 did you review any portion of Patent Owner's response in
15 the -338 IPR?
16 A Can you repeat the question?
17 Q In preparing for your -- in preparing your -338
18 declaration, did you review any portion of the
19 Patent Owner's response in the -338 IPR?
20 A I'm not familiar with that, no.
21 Q Dr. Dutt, who wrote your -338 declaration?
22 A Yes, I wrote an initial draft of the declaration.
23 The substance of the material is mine.
24 Q Are there portions of the final draft that were
25 not included in your initial draft of the -338

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1 **declaration?**
2 A No, I don't believe so.
3 **Q Can you go to your -338 declaration and**
4 **paragraph 2 and the third-to-last line.**
5 A Uh-huh.
6 **Q Do you see there there's a reference to**
7 **"Exhibit XXX"? Do you see that?**
8 A Yes.
9 **Q "Exhibit XXX" in paragraph 2 of your -338**
10 **declaration appears to be a placeholder that was**
11 **mistakenly not updated; is that right?**
12 A That appears to be a typo. That should have been
13 Exhibit 1045, and I didn't catch that, which refers to
14 my CV.
15 **Q Did you write "Exhibit XXX" as a placeholder?**
16 A In my initial draft, yes, I put the placeholders
17 there. I forgot to replace that, I guess.
18 **Q Did you review your -338 declaration before**
19 **signing it?**
20 A I did.
21 **Q Do you recall about how long you spent preparing**
22 **this -338 declaration?**
23 A Could you rephrase the question? Is that -- can
24 you clarify what you mean by how long I spent?
25 **Q About how much time did you spend preparing**

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1 **your -338 declaration?**
2 A I'd have to go back and look, but probably a
3 couple of hours, maybe longer, because there were some
4 items I had to check on.
5 **Q And what items were those that you had to check**
6 **on?**
7 A Items in my CV, to figure out which references I
8 was going to refer to as shown in page 2, Item 2, for
9 example.
10 **Q In the course of preparing your declaration, did**
11 **you do any other research other than reviewing your CV?**
12 A Yes.
13 **Q And what research was that?**
14 A I had to look at my diary to figure out the
15 dates -- to confirm that I had attended the conference.
16 Also I had to go through the proceedings to see which
17 papers I had published in that event and which session I
18 had chaired at that event.
19 **Q So in preparing your -338 declaration, you**
20 **researched your CV, your diary, and the conference --**
21 **DATE conference proceedings. Anything else?**
22 A I looked at the archive of DATE conference
23 proceedings to determine that I had served on the
24 technical program committee for many years, which I had
25 in my CV -- but to confirm that was correct. I also had

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1 to look at the archives to confirm that DATE was formed
2 in 1998 as a merger between several conferences, as
3 shown on page 3, Item 7 of my declaration.
4 **Q So in preparing your -338 declaration, you**
5 **reviewed your CV, your diary, and the archive of the**
6 **DATE conference proceedings; is that fair?**
7 A I'm not done yet. Sorry. I'm still looking
8 through. Yeah. Please give me a minute.
9 I also looked at the publications page of
10 Kees Goossens, a co-author of the 2002 paper, as listed
11 on page 7, Item 23 of my declaration.
12 And I also scanned the Library of Congress
13 catalogue and United States Copyright Office for the
14 references to the DATE conference, to establish those
15 dates, as well as looking at the IEEE Xplore website
16 and -- information on how long that Xplore system had
17 been active and when it had been established.
18 Yeah, I think that's -- those are some of the
19 highlights, yes.
20 **Q Okay. So in preparing your -338 declaration,**
21 **you've stated that you reviewed your CV, your diary, the**
22 **DATE conference proceedings, and the items listed on**
23 **pages 7 and 8, being the Goossens website and the**
24 **Library of Congress and Copyright Office catalogue**
25 **records; is that correct?**

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1 A Also the DATE archive. In addition to the DATE
2 proceedings, I accessed the DATE proceedings archive.
3 Could you repeat the items again that I had
4 accessed, just for clarity?
5 **Q Yes. So in preparing your -338 declaration, you**
6 **reviewed your CV, your diary, the DATE conference**
7 **proceedings and archive, the items listed on pages 7 and**
8 **8 of your -338 declaration from Kees Goossens, the**
9 **Library of Congress and the Copyright Office, and you**
10 **said you also reviewed the IEEE Xplore website; is that**
11 **correct?**
12 A Yes. And also the IEEE Xplore history.
13 **Q Okay. Dr. Dutt, can you please go to your**
14 **second -343 declaration.**
15 A Yes.
16 **Q When were you first asked to prepare your**
17 **second -343 declaration?**
18 A I don't recall the exact date, but it was
19 probably after my first deposition.
20 **Q And your first deposition was on August 27th,**
21 **2024, correct?**
22 A That's correct.
23 **Q So you were asked to prepare the second -343**
24 **declaration sometime after August 27th, 2024, but you**
25 **don't recall specifically when?**

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A That's correct.
Q Was it over a month after your deposition?
A I'd have to go back and look at my calendar.
I -- I don't -- I don't remember the exact dates.
Q In preparing your second -343 declaration, were you made aware of Patent Owner's arguments related to your first -343 declaration?
MR. KOHLHEPP: Object to form.
THE WITNESS: Can you repeat the question? I don't understand the question.
BY MR. HOLT:
Q You submitted two declarations in the -- you have now submitted two declarations in the -343 IPR, correct?
A Yes.
Q In preparing the second -343 declaration, were you made aware of any arguments against your first -343 declaration?
MR. KOHLHEPP: Object to form.
THE WITNESS: I don't recall.
BY MR. HOLT:
Q We previously discussed your preparation of the -338 declaration. Would your responses regarding preparation of the -338 declaration also be applicable to your preparation of the second -343 declaration?
MR. KOHLHEPP: Object to form.

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THE WITNESS: I'm sorry. I didn't understand the question. Can you repeat that question again?
BY MR. HOLT:
Q So a few moments ago, we were discussing your preparation of the -338 declaration, such as how long you spent preparing it and things that you reviewed. Are those -- would your responses to those questions also be applicable with respect to your preparation of the second -343 declaration?
MR. KOHLHEPP: Object to form.
THE WITNESS: Could you specify exactly what responses you're referring to? That's a very broad statement and so...
BY MR. HOLT:
Q Sure. So how long did you spend preparing your second -343 declaration?
A I'd have to look at my diary, but several hours, I would say. To prepare that, it -- it took several hours and -- yeah.
Q Aside from your attorneys, did you discuss the content of your second -343 declaration with anyone else as you prepared it?
A No.
Q Dr. Dutt, let's look at your first -343 declaration.

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A Is that Exhibit 1012?
Q Correct.
A Yes.
Q Do you recall this first -343 declaration?
A Yes.
Q Your first -343 declaration addressed the availability of Radulescu 2004 at the DATE 2004 conference, correct? I can direct you, for example, to paragraphs 21 and 22 of your first -343 declaration.
A Yes. I just got there. Yes.
Q So your first -343 declaration addressed the availability of Radulescu 2004 at the DATE 2004 conference, correct?
A That's correct.
Q Your first -343 declaration does not mention a person of ordinary skill in the art, or POSA, correct?
A Yeah. Yes.
Q And your first -343 declaration does not mention IEEE Xplore, correct?
A I don't see IEEE Xplore listed. But all conference publications are published in IEEE Xplore -- IEEE conferences. So that's, kind of, implicit. And that's the way in which we access the papers after the conference.
Q The words "IEEE Xplore" are not expressly

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mentioned in this first -343 declaration, correct?
A I don't see it listed in the first declaration. But as I mentioned, again, you know, it's the only way in which we can access the conference proceedings after the event.
So if -- if any POSA who works in the area needs to access a paper, they would have to go to IEEE Xplore -- or anyone, in general.
Q As you testified a few moments ago, your first -343 declaration does not mention a POSA, correct?
MR. KOHLHEPP: Object to form.
THE WITNESS: Yeah. But, you know, I -- I know all that material, so I -- as an expert, I -- you know, I have knowledge of what appeared at the conference, of the papers that appeared at the conference, of the fact that I was given a copy of the proceedings, and that the proceedings appeared in IEEE Xplore.
BY MR. HOLT:
Q Your first -343 declaration does not mention "OCP," correct?
A That's correct.
Q Let's go to your second -343 declaration.
A Okay.
Q Your second -343 declaration, like your first -343 declaration, again addresses whether

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1 **Radulescu 2004 was available at the DATE 2004**
2 **conference, correct?**
3 A Yes, as I've indicated on page 6 of the second
4 declaration.
5 **Q And your second declaration expressly discusses**
6 **IEEE Xplore, correct?**
7 A Yes, that's correct. Item 11 on page 9 discusses
8 IEEE Xplore.
9 **Q And if you look at paragraphs 13 and 14 of your**
10 **second -343 declaration, do you see that your**
11 **second -343 declaration expressly discusses the**
12 **availability of Radulescu 2004 from IEEE Xplore,**
13 **correct?**
14 A Yes. 13 and 14 say that it's available through
15 IEEE Xplore. And Item 11 on page 9 -- not 11. Item --
16 sorry -- Item 6 -- Item -- sorry -- Item 8 on page 6.
17 Item 8 on page 6 shows that the -- Goossens paper
18 was in the proceedings that was included in the
19 conference proceedings handed out to attendees.
20 So when I was at the conference, I would have
21 received a copy of the proceedings, including that paper
22 at the conference.
23 And subsequently I could also access the paper
24 through IEEE Xplore, as shown on page -- as you
25 indicated, on page 11.

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1 **Q So my question was just about IEEE Xplore. Do**
2 **you understand that?**
3 A Yes.
4 **Q Your second -343 declaration discusses persons of**
5 **ordinary skill in the art, or POSAs, correct?**
6 A That's correct, Item 5 on page 3 of the second
7 declaration.
8 **Q All right. So in paragraph 5 that you**
9 **identified, you state that -- you state the**
10 **definition -- a definition of a POSA, and that you met**
11 **that definition of a POSA, correct?**
12 A Absolutely, yes.
13 **Q And your second -343 declaration also discusses**
14 **POSAs in connection with the DATE 2004 conference,**
15 **correct?**
16 A That's correct. On paragraph 6, page 4, that's
17 correct.
18 **Q And your second -343 declaration discusses POSAs**
19 **in connection with IEEE Xplore as well, correct?**
20 A That's correct. Item -- paragraph 11 on page 9.
21 **Q And your second -343 declaration addresses the**
22 **availability of OCP, correct?**
23 A Yes. That's correct. Paragraph 19 on page 12.
24 Go ahead.
25 **Q I'm sorry. Were you finished answering,**

Page 23

1 **Dr. Dutt?**
2 A No -- paragraph 19 on page 12, yes.
3 **Q The content in your second -343 declaration could**
4 **have been included in your first -343 declaration, would**
5 **you agree?**
6 MR. KOHLHEPP: Object to form.
7 THE WITNESS: I mean, there's a lot of stuff that
8 could have been included. You know, I have a long
9 publication record, so I couldn't include every paper
10 for that matter, but -- yeah, there could have been a
11 lot of items that could have been included in the first
12 declaration.
13 BY MR. HOLT:
14 **Q Was there anything preventing you from including**
15 **in your first -343 declaration, the content that you**
16 **later included in your second -343 declaration?**
17 MR. KOHLHEPP: Object to form.
18 THE WITNESS: I'm not sure I understand the
19 question. Can you repeat the question again?
20 BY MR. HOLT:
21 **Q My question was: Nothing was preventing you from**
22 **including in your first -343 declaration, the content**
23 **that you later included in your second -343 declaration,**
24 **correct?**
25 MR. KOHLHEPP: Object to form.

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1 THE WITNESS: Yeah, I mean, my CV -- I have a
2 long CV with lots of papers. So we could have included
3 just about any paper from my CV. So, again, I'm not
4 sure what -- you know, what that means in the context of
5 my reply declaration.
6 BY MR. HOLT:
7 **Q Your first -343 declaration, as we discussed**
8 **earlier, addresses the availability of Radulescu 2004 at**
9 **the DATE 2004 conference, correct?**
10 A Yes.
11 **Q And you also address the availability of**
12 **Radulescu 2004 at the DATE 2004 conference in your**
13 **second -343 declaration, correct?**
14 A Yes.
15 **Q So the content in your second declaration**
16 **regarding availability of Radulescu 2004 at the**
17 **DATE 2004 conference, that content could have been**
18 **included in your first -343 declaration, correct?**
19 MR. KOHLHEPP: Object to form.
20 THE WITNESS: I -- I don't know. I don't
21 understand the question. It looks like we're going in
22 circles. I'm sorry.
23 I -- I -- the DATE conference proceedings
24 included all of the papers that were presented at
25 DATE 2004. And as I stated in my first declaration,

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1 those proceedings were handed out to attendees, and
2 attendees who were not able to attend or people who were
3 not able to attend the conference could also access
4 those proceedings via IEEE Xplore.
5 So the sum of everything is based on the fact
6 that papers are made available to the general public,
7 either as an attendee at the conference or later on
8 through IEEE Xplore.
9 So I -- you know, I don't understand the question
10 again.
11 BY MR. HOLT:
12 **Q So you don't understand my question of whether**
13 **content written in your second declaration -- whether or**
14 **not it could have been included, that is written, in**
15 **your first -343 declaration?**
16 MR. KOHLHEPP: Object to form.
17 THE WITNESS: Again, you know, a declaration
18 could include everything in my CV, so we could include
19 just about every one of the 300-plus or 400-plus papers
20 that I have. So -- you know, it -- it could include a
21 lot.
22 BY MR. HOLT:
23 **Q Dr. Dutt, I'm not asking about all of your**
24 **papers. I'm asking specifically about your discussion**
25 **of Radulescu 2004 at the DATE 2004 conference. You**

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1 **address the availability of Radulescu 2004 at the**
2 **DATE 2004 conference in your second -343 declaration,**
3 **correct?**
4 A Yes.
5 **Q Do you agree that you could have written in your**
6 **first declaration in the -343 IPR, the information that**
7 **you later included in your second -343 declaration**
8 **regarding the availability of Radulescu 2004 at the**
9 **DATE 2004 conference?**
10 MR. KOHLHEPP: Object to form.
11 THE WITNESS: I mean, Item 21 on page 5 of the
12 first declaration shows that the Radulescu paper was in
13 the proceedings. So I -- I don't understand the
14 question again. It's already there in the first
15 declaration.
16 BY MR. HOLT:
17 **Q So, Dr. Dutt, if you say that the availability of**
18 **Radulescu 2004 at the DATE 2004 conference was already**
19 **addressed in your first -343 declaration, why did you**
20 **submit a second -343 declaration also discussing the**
21 **availability of Radulescu 2004 at the DATE 2004**
22 **conference?**
23 MR. KOHLHEPP: Object to form.
24 THE WITNESS: I mean, there's no harm in saying
25 it again in the content of the reply that I had, which

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1 is a factual statement that it actually did appear in
2 the proceedings and that it was made available. Also to
3 establish that it was also available through
4 IEEE Xplore, which was not mentioned in the first
5 declaration because it was implicit. As an expert, I
6 would know that if the proceedings -- if -- were handed
7 out at the conference, the proceedings and the papers
8 therein would be made available through IEEE Xplore and
9 could be accessed by any expert.
10 BY MR. HOLT:
11 **Q Dr. Dutt, do you agree that availability at the**
12 **actual DATE conference is different from availability**
13 **later via IEEE Xplore?**
14 MR. KOHLHEPP: Object to form.
15 THE WITNESS: Can you say exactly what you mean
16 by different in terms of availability?
17 BY MR. HOLT:
18 **Q An attendee at the DATE conference allegedly has**
19 **access to the conference proceedings at the DATE**
20 **conference, correct?**
21 A That is correct.
22 **Q And those proceedings are, as you allege,**
23 **uploaded to IEEE Xplore sometime after the DATE**
24 **conference, correct?**
25 A That is correct. But IEEE says that the date of

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1 publication is the last date of the conference. So in
2 terms of timing, that paper -- the timestamp -- as an
3 academic, when we look at papers that are published, we
4 look at the date of the conference, not the date when it
5 was made available through IEEE Xplore.
6 And you can look at all the references in my CV,
7 for example, that refer to the date at which the
8 conference was held, which is the timestamp for the
9 conference paper.
10 **Q Does someone attending the DATE conference have**
11 **access to the conference proceedings via IEEE Xplore**
12 **during the conference, or only later when they're**
13 **uploaded to IEEE Xplore?**
14 A If I understand your question correctly, you're
15 asking if an attendee at the conference has access to
16 the papers. Yes, the attendee at the conference has
17 access to the papers in the proceedings that were handed
18 out at the conference.
19 **Q So the conference attendee does not have**
20 **immediate access of the conference papers via**
21 **IEEE Xplore while at the DATE conference, correct?**
22 A The conference attendee doesn't need to have
23 access to the IEEE Xplore version of that conference
24 proceedings because they're in possession of the
25 proceedings handed out to them at the conference that

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1 contains all the papers. So there's no need to access
2 IEEE Xplore --
3 **Q Dr. Dutt, my question --**
4 A -- for that particular conference edition.
5 **Q Dr. Dutt, you understand my question is not what**
6 **a conference attendee needs. My question is,**
7 **specifically: Does an attendee at a DATE conference**
8 **have access to the conference proceedings via**
9 **IEEE Xplore while at the conference?**
10 A The attendee would have access to IEEE Xplore of
11 all prior conference proceedings. And for that
12 particular event, the attendee would have a copy of the
13 proceedings at hand to be able to access the papers.
14 So, you know, it's really about being able to
15 access the papers. And the attendee has, indeed, the
16 opportunity to access all of the papers at the time of
17 registration at the conference.
18 **Q So, Dr. Dutt, again, my question is not about**
19 **prior conference proceedings and it's not about the**
20 **paper copy of proceedings at an actual conference.**
21 **My question is: An attendee at a particular**
22 **conference does not have access to that conference's**
23 **proceedings via IEEE Xplore during that conference, but,**
24 **rather, only can access the proceedings via IEEE Xplore**
25 **later once the proceedings are added to IEEE Xplore; is**

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1 **that right?**
2 A That statement is right, but it doesn't make
3 sense, because the attendee already has access to the
4 papers, so why would the attendee wait for IEEE Xplore a
5 few months later to access the paper again?
6 But -- factually, yes, you're right. But, again,
7 the paper -- if I'm an attendee at the conference, I
8 have access to all of the papers and I don't need to go
9 to IEEE Xplore for that edition of the conference,
10 because I have the proceedings with me.
11 **Q Let's go to your first -343 declaration. In**
12 **paragraph 21 -- let me know when you're there.**
13 A Is this Exhibit 1012, right?
14 **Q Correct.**
15 A What page number again?
16 **Q It's paragraph 21, starting on page 5.**
17 A Yes.
18 **Q So paragraph 21 of your first -343 declaration**
19 **alleges that Radulescu 2004 was included in the list of**
20 **proceedings for the DATE 2004 conference.**
21 **Do you see that?**
22 A Yes, this is a fact. It's not an allegation.
23 It's -- it's a fact that it appeared, yes. And it did
24 appear in the proceedings and -- you know, you can look
25 at the table of contents and all of the exhibits that

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1 show that it was included in the proceedings, yes.
2 **Q This paragraph 21 in your first -343 declaration**
3 **does not indicate when Radulescu 2004 was added to**
4 **IEEE Xplore, correct?**
5 A Item -- paragraph 21 of my first exhibit does not
6 refer to IEEE Xplore, that is correct.
7 **Q If we look at paragraph 22 of your first -343**
8 **declaration, it says:**
9 **"All of these papers -- the six papers**
10 **I authored/co-authored as well as the**
11 **Radulescu 2004 paper -- were papers that**
12 **were accepted for the DATE 2004**
13 **conference. As papers that were**
14 **accepted for the conference, they were**
15 **included in the physical copy of the**
16 **DATE 2004 conference proceedings that**
17 **were handed out..."**
18 **Do you see that?**
19 A Yes.
20 **Q So this paragraph 22 of your first -343**
21 **declaration, again, does not mention IEEE Xplore or when**
22 **Radulescu 2004 was available from IEEE Xplore, correct?**
23 A That's correct. The papers appeared in the
24 conference proceedings and they were available to all
25 conference attendees at that time.

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1 Can we take a short break whenever we're ready?
2 **Q Yes. I have just one or two more questions and**
3 **then --**
4 A Okay.
5 **Q -- we can break, if that's all right.**
6 **So in -- in paragraph 23, it states -- or excuse**
7 **me. In paragraph 23 of your first -343 declaration, you**
8 **state:**
9 **"I also see that Kees Goossens, one of**
10 **the co-authors of the Radulescu 2004**
11 **paper, has the same paper listed and**
12 **linked to his research website as having**
13 **been presented at the DATE 2004**
14 **conference in February 2004."**
15 **This paragraph 23 of your -343 declaration,**
16 **again, does not mention IEEE Xplore or when**
17 **Radulescu 2004 paper was available from IEEE Xplore; is**
18 **that correct?**
19 A Item 23 does not mention that, that's correct.
20 MR. HOLT: Okay. Let's go off the record.
21 THE STENOGRAPHIC REPORTER: Is that okay, Peter?
22 MR. KOHLHEPP: Oh, yes.
23 (Recess.)
24 MR. HOLT: Let's go back on the record.
25 //

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1 BY MR. HOLT:
2 **Q Dr. Dutt, did you discuss the deposition with**
3 **anyone on break?**
4 A No.
5 **Q Dr. Dutt, right before we took a break, we were**
6 **looking at paragraphs 21 through 23 of your first -343**
7 **declaration. Do you recall that?**
8 A Yes.
9 **Q And you agreed that there's no discussion of**
10 **IEEE Xplore in paragraphs 21 through 23 of your**
11 **first -343 declaration, correct?**
12 A That's correct.
13 **Q The Radulescu 2004 document is not referenced in**
14 **any other paragraphs of your first -343 declaration,**
15 **other than paragraphs 21 through 23, correct?**
16 MR. KOHLHEPP: Object to form.
17 THE WITNESS: I'm going to take a look.
18 Yes.
19 BY MR. HOLT:
20 **Q For your first -343 declaration, Dr. Dutt, you**
21 **were asked to address whether the Radulescu 2004 paper**
22 **was available in the conference proceedings handed out**
23 **at the DATE 2004 conference; is that correct?**
24 A I stated that the Radulescu 2004 paper was
25 included in the conference proceedings and appeared at

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1 the conference -- at the DATE 2004 conference -- in my
2 declaration, yes, that's what I stated.
3 **Q For your first -343 declaration, you were not**
4 **asked to address when Radulescu 2004 became available**
5 **from IEEE Xplore, correct?**
6 A I did not have any mention of IEEE Xplore in the
7 first declaration.
8 **Q If you had been asked to address in your**
9 **first -343 declaration when Radulescu 2004 was available**
10 **via IEEE Xplore, you could have included that in your**
11 **first -343 declaration, correct?**
12 MR. KOHLHEPP: Object to form.
13 THE WITNESS: Yeah, sure.
14 BY MR. HOLT:
15 **Q Your first -343 declaration does not address**
16 **availability of OCP, correct?**
17 A That's correct, it doesn't have mention of OCP.
18 That's correct.
19 **Q If you had been asked to address the availability**
20 **of OCP in your first -343 declaration, then you could**
21 **have discussed that in your first -343 declaration,**
22 **correct?**
23 MR. KOHLHEPP: Object to form.
24 THE WITNESS: Yeah.
25 //

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1 BY MR. HOLT:
2 **Q You agreed earlier that there's no express**
3 **discussion of a person of ordinary skill in the art, or**
4 **POSA, in your first -343 declaration; is that right?**
5 MR. KOHLHEPP: Object to form.
6 THE WITNESS: I mean, I am an expert in the area,
7 so -- with -- with my history of engagement in the
8 conferences and publications in the area, I am an
9 expert, and so I meet that definition.
10 BY MR. HOLT:
11 **Q You do not state in your first -343 declaration**
12 **that you qualified as a POSA as of 2004, correct?**
13 MR. KOHLHEPP: Object to form.
14 THE WITNESS: Item 5, it says that I've worked
15 for 34 years in the fields of WCS and, you know, blah,
16 blah. So there is, you know, ample evidence of my
17 having met that specification as an expert.
18 BY MR. HOLT:
19 **Q Your second -343 declaration expressly includes**
20 **the definition of a POSA and says that you meet that**
21 **definition, correct?**
22 A This is Exhibit 1038?
23 **Q Yes.**
24 A That's correct. Paragraph 5 on page 3 of
25 Exhibit 1038 defines a POSA.

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1 **Q You do not include that definition in your**
2 **first -343 declaration, correct?**
3 A Yeah, but I was an -- I mean, I clearly am an
4 expert and meet that definition.
5 **Q The definition provided in your second -343**
6 **declaration for a POSA is not expressly described in**
7 **your first -343 declaration, correct?**
8 A That's correct. But as I mentioned, you know, if
9 you look at Item 5 in Exhibit 1012, I clearly meet that
10 definition.
11 **Q The words "person of ordinary skill," or POSA,**
12 **are not expressly included in your first -343**
13 **declaration, correct?**
14 A That phrase is not included in the first
15 declaration. But, again, as I mentioned, if you look at
16 Item 5 and -- 5 through maybe 8, I clearly meet that
17 definition as an expert.
18 **Q If -- if we look at your second -343 declaration**
19 **in paragraph 5, where you've included a definition for a**
20 **POSA, that definition includes the requirement of at**
21 **least three years of work experience in the field of SoC**
22 **design. Do you see that?**
23 A Yes.
24 **Q In your first declaration, you don't state that**
25 **you have experience in SoC design, correct?**

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1 A If you look at Item 5, it talks about my
2 expertise in the exploration and evaluation of
3 domain-specific embedded systems spanning both hardware
4 and software, and I attend conferences on computer chip
5 design. So any expert in the area would say that covers
6 SoC design.
7 **Q So it's your testimony that your first**
8 **declaration demonstrated that you had experience in SoC**
9 **design?**
10 A The declaration doesn't explicitly mention SoC
11 design. But as an expert -- or any expert in the area
12 looking at my profile and looking at the publications
13 and my experience would say that I have had that
14 experience in SoC design.
15 **Q Dr. Dutt, let's go to your first deposition**
16 **transcript. This is Exhibit 2067 in the -343 IPR.**
17 A Uh-huh.
18 **Q If you go to page 82, line 23.**
19 A Yeah.
20 **Q You were asked there:**
21 **"You" -- "You don't recall whether**
22 **you've had any experience designing a**
23 **system-on-chip?"**
24 **Do you see that?**
25 A I beg to differ. I don't think I said that I

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1 don't have experience in designing system-on-chip.
2 I think -- the question was, have you had any
3 experience designing system-on-chip? And I said I have
4 to go back and research that question to see exactly
5 when, because I was not prepared to answer that
6 particular question.
7 But if you look at the résumé, you can see that
8 there are several papers that I've published in the area
9 of system-on-chip. So clearly I have demonstrated that
10 ability.
11 **Q So you did not recall during your first**
12 **deposition whether or not you had experience in SoC**
13 **design; is that correct?**
14 A That is incorrect. I said that I'd have to
15 research exactly when, and I hadn't had time to look at
16 that in preparation for the deposition. I did not say
17 that I do not know SoC design. It says I'd have to go
18 back --
19 **Q If you go to --**
20 A -- to my CV and research if and when [verbatim]
21 projects I've worked on since I've had a fairly long
22 area -- career in this area.
23 **Q Do you see the question in your first deposition**
24 **on page 82 at line 23?**
25 A Uh-huh.

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1 **Q Do you see that that question asked whether you**
2 **recall whether you've had experience designing a**
3 **system-on-chip? Do you see that?**
4 A I see that.
5 **Q That question doesn't ask about any time frame.**
6 **It just asked, in general, do you recall having**
7 **experience designing a system-on-chip. Do you see that?**
8 A Uh-huh.
9 **Q And your response, on the top of page 83 of your**
10 **first deposition says, you'd have to go back and look at**
11 **your CV and research. You said, "I don't think I'm**
12 **prepared to answer the question at this time."**
13 **So you were not prepared at that time to answer**
14 **if you had any experience designing a system-on-chip; is**
15 **that correct?**
16 A That's not correct. I said I'm not prepared to
17 answer without having looked carefully at my CV to
18 determine when and which projects I've worked on.
19 **Q So in your first deposition --**
20 A I have to make sure that I was factually correct,
21 and so I have to do my homework before I answer
22 questions correctly.
23 **Q So in your first deposition, you were asked**
24 **whether you had any experience designing a**
25 **system-on-chip, and you're saying that you could not**

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1 **answer that question without first researching your**
2 **experience; is that fair?**
3 A In the context of the deposition that I had, I
4 was under oath, and I wanted to make sure that anything
5 I say is factually correct and aligned with my CV. So I
6 wanted to be careful and make sure that I'm prepared
7 when I make statements. And -- so that's why I said I
8 have to go back and look at my CV.
9 And, in fact, if you look at page 83, lines 11
10 through 14, I state exactly that:
11 "...because this is a deposition, I
12 want to be accurate in what I say. So I
13 want to go back and see exactly what
14 kinds of engagement I had. And I don't
15 think I'm prepared to answer that line
16 of question today in this deposition."
17 **Q Dr. Dutt, in your -- for your first -343**
18 **declaration, if you had been asked to include the**
19 **definition of a POSA, you could have included that,**
20 **correct?**
21 A I'm sorry. What -- what's the speculation that
22 you're saying? Can you rephrase -- rephrase that again?
23 **Q My question is: From your first -343**
24 **declaration, if you were asked to include the definition**
25 **of a POSA, that you later included in your second -343**

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1 **declaration, you could have included that definition in**
2 **your first -343 declaration, correct?**
3 MR. KOHLHEPP: Object to form.
4 THE WITNESS: The definition of a POSA?
5 BY MR. HOLT:
6 **Q Yes.**
7 A Sure.
8 **Q And in your second -343 declaration, you include**
9 **a statement that you met that definition.**
10 **If you were asked to include that statement in**
11 **your first -343 declaration, you could have done so,**
12 **correct?**
13 MR. KOHLHEPP: Object to form.
14 THE WITNESS: Are you asking if I could have
15 included -- if I had been asked to include the
16 definition of a POSA, I could have included that in my
17 first declaration? Is that the question?
18 BY MR. HOLT:
19 **Q Yeah. So -- looking at your second -343**
20 **declaration, at paragraph 5, you state there a**
21 **definition for a POSA and state that you met that**
22 **definition of a POSA. Do you see that?**
23 A Yes. On page 3, line 5 of Exhibit 1038, yes.
24 **Q If you were asked to include that paragraph 5 of**
25 **your second -343 declaration in your first -343**

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1 **declaration, you could have done that, correct?**
2 MR. KOHLHEPP: Object to form.
3 THE WITNESS: Yeah, sure.
4 BY MR. HOLT:
5 **Q And we discussed earlier that your second -343**
6 **declaration discusses POSAs in relation to the DATE 2004**
7 **conference, correct, such as in paragraph 6 of your**
8 **second -343 declaration?**
9 A That's correct. Yes.
10 **Q So that discussion of POSAs in connection to the**
11 **DATE 2004 conference in your second -343 declaration,**
12 **that could have been included in your first -343**
13 **declaration if you were asked to include it, correct?**
14 MR. KOHLHEPP: Object to form.
15 THE WITNESS: Yeah.
16 BY MR. HOLT:
17 **Q And your second -343 declaration also discusses**
18 **POSAs in relation to IEEE Xplore. Do you agree with**
19 **that? Such as paragraphs 11 and 13?**
20 A Yes.
21 **Q That discussion in your second -343 declaration**
22 **about POSAs in regard to IEEE Xplore could have been**
23 **included in your first -343 declaration if you were**
24 **asked, correct?**
25 MR. KOHLHEPP: Object to form.

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1 THE WITNESS: Yeah.
2 BY MR. HOLT:
3 **Q Let's go to your second -343 declaration again.**
4 A Okay.
5 **Q In paragraph 5 of your second -343 declaration,**
6 **as we previously discussed, you recite the definition of**
7 **a POSA and state, in the last sentence, that you met**
8 **that definition by 2004 "for the reasons explained**
9 **above."**
10 **Do you see that?**
11 A Correct. Yes.
12 **Q And then above, in paragraphs 3 and 4, you**
13 **discuss your qualifications for meeting that definition**
14 **of a POSA; is that right?**
15 A Yes.
16 **Q Looking at paragraph 4 of your second -343**
17 **declaration, you discuss your experience with**
18 **system-on-chip, aka SoC, correct?**
19 A That's correct.
20 **Q And in your -- and in that same paragraph 4 of**
21 **your second -343 declaration, you discuss your**
22 **experience with network on a chip, aka NoC?**
23 A That's correct.
24 **Q And also in paragraph 4 of your second -343**
25 **declaration, in the second sentence, you discuss your**

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1 **experience with large-scale networks, correct?**
2 A That's correct. Actually, the sentence is
3 "understanding of SoC interconnects and concepts of
4 large-scale networks."
5 **Q And in the last sentence of paragraph 4 of your**
6 **second -343 declaration, you discuss your experience**
7 **with SoC design, correct?**
8 A Yes.
9 **Q Dr. Dutt, are you familiar with a system on a**
10 **chip?**
11 A Sure.
12 **Q What is a system on a chip?**
13 A Are you asking me to define what a system-on-chip
14 is?
15 **Q What is your understanding of a system on a chip?**
16 A It's a broad term, and it depends on the context
17 of use. And so -- as the phrase itself states, it's
18 essentially the realization of a system on a single
19 chip.
20 **Q Are you familiar with a network on a chip?**
21 A Yes.
22 **Q Are you familiar with large-scale networks?**
23 A Yes.
24 **Q Do you have any experience with SoC design?**
25 A I do. As I indicated in Item 4 -- paragraph 4,

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1 page 3, I've had a long history of doing SoC-based
2 design and published several papers on the topic as
3 well.
4 **Q How many years of experience did you have with**
5 **SoC design as of 2004?**
6 A I'd have to go back and look at my résumé to give
7 you a factual answer. But if you look at Item 3, you
8 can already see that we had publications starting in at
9 least 2001. And also my résumé may have some others
10 that show as early as 1999. But I'd have to go back and
11 confirm those in my résumé, which I'll be happy to do
12 right now if you'd like me to do that.
13 **Q In the last sentence of paragraph 4 of your -343**
14 **declaration, you state that:**
15 **"I was involved with work on SoC**
16 **design at least as early as 2001."**
17 **Do you see that?**
18 A I do.
19 **Q Does that refresh your memory as to how many**
20 **years of experience you had with SoC design as of 2004?**
21 A Uh-huh.
22 **Q So, Dr. Dutt, you understand that I just asked**
23 **you a series of questions, including whether you are**
24 **familiar with system on a chip, network on a chip, and**
25 **large-scale networks, and whether you had experience**

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1 **with SoC design.**
2 **You were asked those same series of questions in**
3 **your first deposition. Do you recall that?**
4 A Yes.
5 **Q And do you recall that in your first deposition,**
6 **you elected not to answer that series of questions?**
7 MR. KOHLHEPP: Object to form.
8 THE WITNESS: In my first declaration [sic], I
9 was not prepared since I had not researched my CV in
10 great detail for these topics, as opposed to in the
11 second declaration [sic], I had an opportunity to do a
12 deep dive and look at those items.
13 BY MR. HOLT:
14 **Q You said your "first declaration," but I think**
15 **you meant to say your first deposition, correct?**
16 A That's correct. I'm sorry. First deposition,
17 yes.
18 **Q So it's your testimony that you did not provide**
19 **answers to those questions in your first deposition**
20 **because you were not prepared to answer those questions**
21 **at that time?**
22 MR. KOHLHEPP: Object to form.
23 THE WITNESS: I'll go back to my statement in the
24 deposition on page 83, "because it's a" -- "because this
25 is a deposition" -- lines 12, 13, and 14 -- "I wanted to

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1 be accurate in what I say, so I want to be able to go
2 back and see exactly what kinds of engagement I had."
3 BY MR. HOLT:
4 **Q So, Dr. Dutt, why is it that you were able to**
5 **answer the series of questions about your experience**
6 **sitting here today but not in your first deposition?**
7 MR. KOHLHEPP: Object to form.
8 THE WITNESS: In preparation for the --
9 MR. KOHLHEPP: Also asked and answered.
10 Go ahead.
11 THE WITNESS: I had to research in great detail
12 for my second declaration [sic], at which time I had the
13 opportunity to do a deep dive and look at my CV and
14 address all of those questions. So -- at which point I
15 had information at my fingertips -- factual information
16 on my fingertips about my engagement with SoC design,
17 which I did not have at the time of the first -- at my
18 fingertips at the first deposition.
19 BY MR. HOLT:
20 **Q Your first deposition was about your first -343**
21 **declaration, correct?**
22 A That's correct.
23 **Q So if your experience related to things such as**
24 **SoCs, NoCs, and large-scale networks had been included**
25 **in your first -343 declaration, then you would have been**

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1 **prepared to discuss your experience with those items**
2 **during your first deposition; is that fair?**
3 A Yeah. That's fair.
4 **Q Let's go to your second -343 declaration, at**
5 **paragraph 18.**
6 A Okay.
7 **Q In paragraph 18 of your second -343 declaration,**
8 **starting on the second sentence, you state:**
9 **"For example, the Open Core Protocol**
10 **specifications, including the 2001**
11 **version 1.0 specification, were**
12 **available from ocpip.org website in the**
13 **late 2003 and early 2004 time frame.**
14 **One could easily obtain a copy of the**
15 **OCP specification by going to the**
16 **website and completing the click-through**
17 **license agreement," and then you cite**
18 **Exhibit 1019, correct?**
19 A Yes.
20 **Q I've just uploaded a document that was previously**
21 **marked as Exhibit 1019 in the -343 IPR, which is the**
22 **exhibit you cite in paragraph 18 of your second -343**
23 **declaration, correct?**
24 A That's correct.
25 **Q And in paragraph 18, you specifically cite to**

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1 **page 5 of Exhibit 1019, correct?**
2 A That's correct.
3 **Q Can you go to page 5 of Exhibit 1019, please.**
4 A Yes.
5 **Q This page 5 of Exhibit 1019, that you rely on in**
6 **paragraph 18 of your second -343 declaration, it shows**
7 **hyperlinks but it does not show an actual copy of the**
8 **OCP document; is that right?**
9 A This particular exhibit does not show the actual
10 document. But we have other exhibits in my declaration
11 that show the actual OCP -- a copy of the OCP, as well
12 as a reference to another website from a colleague in
13 Italy.
14 **Q But looking for now just at this Exhibit 1019 in**
15 **the -343 IPR, this Exhibit 1019, as you acknowledge,**
16 **does not show the actual OCP document, correct?**
17 A That is correct. And my statement in my
18 declaration, line 18, does not say that this is the
19 copy. It says you could obtain a copy of the OCP
20 specification by going to the website and completing the
21 click-through license.
22 So this exhibit is pointing to the method for
23 accessing and obtaining the OCP, but does not refer to
24 the actual document being included in this particular
25 exhibit.

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1 **Q In preparing your second -343 declaration, did**
2 **you attempt to follow any of the hyperlinks shown in**
3 **Exhibit 1019 to access the OCP document?**
4 A This is a quite -- quite some time ago. So I did
5 not do that. But that was the mechanism we used at that
6 time to access the document, because you had to click
7 through, agree to their terms, and they would mail you
8 the specific- -- email you the specification within a
9 day.
10 And so that's what we -- that's the mechanism we
11 used at that time to obtain that particular document.
12 **Q Dr. Dutt, my question is more specific. It's**
13 **specific to preparation of your second -343 declaration.**
14 **And so I'll ask again: In preparing your**
15 **second -343 declaration, did you try following any of**
16 **the hyperlinks shown in Exhibit 1019 to access the OCP**
17 **document?**
18 MR. KOHLHEPP: Object to form. Asked and
19 answered.
20 THE WITNESS: I did not physically click on the
21 links. But I did have access to -- just to finish that,
22 if I needed access to the document, I would have gone to
23 the version publicly available at the website of
24 Dr. Luca Benini, as I indicated on page 19. So I
25 wouldn't have to go through the links anyway.

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1 BY MR. HOLT:
2 **Q So you're not aware if the links in Exhibit 1019**
3 **are broken links, correct?**
4 MR. KOHLHEPP: Object to form.
5 THE WITNESS: I -- I don't know. I didn't try
6 that. But I didn't have a need to do it and so -- but
7 just to clarify, the declaration Item 18 indicated the
8 mechanism that I had used at that time to access a copy
9 of the OCP protocol. That's the -- that's the context
10 of that particular statement 18.
11 BY MR. HOLT:
12 **Q Let's go to your second -343 declaration,**
13 **paragraph 19.**
14 A Uh-huh. Yes.
15 **Q In paragraph 19 of your second -343 declaration,**
16 **you state:**
17 **"I also understand that the OCP 2001**
18 **version 1.0 specification was also**
19 **publicly available from the website URL**
20 **of" -- and then you include a URL and cite to**
21 **Exhibit 1013. Do you see that?**
22 A Uh-huh.
23 **Q And paragraph 19 then says, "This is the website**
24 **of Dr. Luca Benini," correct?**
25 A Uh-huh.

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1 **Q The URL in paragraph 19 of your second -343**
2 **declaration was provided to you by your attorneys,**
3 **correct?**
4 A That's correct.
5 **Q So you did not independently search for and find**
6 **this URL in paragraph 19 of your second -343**
7 **declaration, correct?**
8 A That is correct.
9 **Q And so your statement in paragraph 19 of your**
10 **second -343 declaration, that you understand the OCP was**
11 **publicly available via this URL from the Benini website,**
12 **that understanding is based on your attorneys providing**
13 **you with that information, correct?**
14 MR. KOHLHEPP: Object to form.
15 THE WITNESS: Well, Luca -- Dr. Luca Benini and I
16 have been colleagues for a long time. If you look at
17 the publication that I had in Item 20, Exhibit 1039,
18 there was a paper that we have published that actually
19 used the OCP. So we have actually gone through the
20 process in the past of having downloaded that OCP and
21 have that somewhere in -- in our archives 20-plus years
22 ago. So I have seen that manuscript.
23 And Dr. Benini and I have been colleagues for a
24 long time. We've worked on projects together.
25 And so -- so, you know, if -- if I did get this

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1 information from my attorneys that this was available,
2 then I would -- I would trust that source as a reliable
3 source, since we have worked on projects together and
4 he's an authority in the area as well.
5 BY MR. HOLT:
6 **Q You mentioned that the OCP is in your archives,**
7 **but you have not included any evidence in your**
8 **second -343 declaration of the OCP being stored in your**
9 **archives, correct?**
10 A I did not say I had it. I said it may have been
11 in our archives. I -- I don't have archives going back,
12 for our lab, to 20 years, of all the documentation. But
13 we do have evidence that we had used that -- as I
14 mentioned in Item 20, that the paper I co-authored in
15 September 2004 actually referred to the OCP. And we had
16 been using OCP at that time in some projects.
17 **Q So you said you don't have archives in your lab**
18 **going back 20 years, correct?**
19 A I -- I don't have -- I'd have to research that.
20 I'd have to dig in and see if I have it. But I don't
21 have it at the -- at my fingertips at this point. So --
22 I'd have to go back and check with my students and see
23 if they have that on their hard drives.
24 So I don't -- I don't have a repository of every
25 project I've done in my 34-year career in one place. If

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1 that's what you mean by archive, that I do not have.
2 But we do have projects that have been done and could be
3 maintained by various colleagues and students over the
4 years.
5 But to the matter of this declaration, there was
6 no need for me to go back and check in the archives,
7 because the paper that I had published actually used
8 that particular reference to OCP. And we had projects
9 that actually used the OCP at that time.
10 **Q So, Dr. Dutt, we're still looking at just**
11 **paragraph 19 --**
12 A Okay.
13 **Q -- for now.**
14 **In preparing your second -343 declaration, did**
15 **you try accessing this URL in paragraph 19?**
16 A I did not do this particular one, no, I did not.
17 **Q Do you recall ever visiting the URL in**
18 **paragraph 19 of your second -343 declaration in the**
19 **past?**
20 A I have visited the website of Professor
21 Luca Benini and his NoC website many times in the past.
22 And so it's possible I may have downloaded this from his
23 website as well in the past.
24 But for that, you know, I'd have to -- I'd have
25 to go back and do research to see for which projects.

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1 So I have accessed his website,
2 micrel.deis.unibo.it/~benini/NOC. Because he's
3 published a lot of papers in the area, and we have
4 referred to a lot of his work.
5 **Q But as you said, you don't have any recollection**
6 **of visiting specifically this URL in paragraph 19 of**
7 **your second -343 declaration any time during preparation**
8 **of your declaration or prior?**
9 A I did not click on that web -- on that particular
10 link, if that's what -- what you're asking me.
11 **Q And you said you don't recall whether you have**
12 **visited that specific URL in the past, correct?**
13 A I may have visited it. I -- I don't remember.
14 As I said, we're collaborators, and so there may have
15 been an opportunity for us to have visited it in the
16 past, but I don't recall.
17 **Q In paragraph 20 of your second -343 declaration,**
18 **you cite to Exhibit 1039. Do you see that?**
19 A Yes.
20 **Q So I'm now uploading a document that was**
21 **previously marked as Exhibit 1039 in the -343 IPR, which**
22 **is the exhibit you cite in paragraph 20 of your**
23 **second -343 declaration, correct?**
24 A Yes.
25 **Q If you go to the references section on the last**

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1 **page of Exhibit 1039, Reference Number 4 cites to,**
2 **quote, "Open Core Protocol International Partnership**
3 **(OCP-IP) OCP data sheet, http://www.ocpip.org."**
4 **Do you see that?**
5 A Yes.
6 **Q So this citation in Exhibit 1039 says "OCP data**
7 **sheet," correct?**
8 A That's correct.
9 **Q The citation in 10- -- Exhibit 1039 does not**
10 **specifically say "OCP specification," correct?**
11 MR. KOHLHEPP: Object to form.
12 THE WITNESS: As a practicing engineer or
13 scientist, a data sheet is a concise representation of
14 the actual OCP -- of the protocol.
15 So for the purpose of a person who's practicing,
16 we would actually refer to the data sheet as a working
17 document of that particular body of work.
18 So yes, the paper refers to the data sheet, which
19 is an operational specification of the overall
20 specification of the protocol.
21 BY MR. HOLT:
22 **Q So the OCP data sheet is different from the OCP**
23 **specification?**
24 A It's a concise summary of the specification.
25 **Q So a summary is different than a full document**

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1 **that it is summarizing, correct?**
2 A It's different, but it's the working reference
3 that practicing engineers who are designing SoCs would
4 use in their day-to-day work. They would actually use
5 the data sheet to determine -- in fact, I would argue
6 that the data sheet is the definitive working document
7 that we use in -- in our designs. And the specification
8 has a lot more of the legalese that go into defining the
9 broader context of that particular data sheet.
10 **Q Okay. So the OCP specification may have**
11 **information not included in the OCP data sheet? Is that**
12 **what you're saying?**
13 MR. KOHLHEPP: Object to form.
14 THE WITNESS: It's possible it may have other
15 information that one may not need when you're actually
16 designing -- in the process of doing a design. There
17 may be other information in the specification, such as
18 maybe legal requirements and whatnot. Uh-huh.
19 BY MR. HOLT:
20 **Q So you agree that there is a difference between**
21 **an OCP specification and an OCP data sheet, right?**
22 MR. KOHLHEPP: Object to form.
23 THE WITNESS: Well, clearly they're different,
24 but they're clearly referring to the same specification
25 because it's an embodiment of that specification.

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1 So, again, as a practicing engineer and as a
2 POSA, if I were to use the data sheet of the OCP, that
3 would mean I'm following the OCP specification.
4 BY MR. HOLT:
5 **Q In Exhibit 1039, the citation to OCP data sheet**
6 **does not indicate a particular version of OCP, correct?**
7 MR. KOHLHEPP: Object to form.
8 THE WITNESS: This particular paper does not
9 specify the -- the version of the OCP.
10 BY MR. HOLT:
11 **Q The citation in Exhibit 1039 cites to the general**
12 **home page of ocpip.org, correct?**
13 A That is correct.
14 **Q It does -- the citation in Exhibit 1039 does not**
15 **include a URL that would lead directly to the --**
16 **directly to an OCP specification; is that right?**
17 MR. KOHLHEPP: Object to form.
18 THE WITNESS: Again, it's -- it's over 20 years,
19 so I -- I don't remember, at that time, if you clicked
20 on www.ocpip.org, what body of information would be
21 there. But that would be the place one would start.
22 And in our academic literature, we would point to
23 the website of the organization as a reference point for
24 all of the information regarding the specification and
25 the data sheet. So that was the practice that we used

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1 at that time.
2 BY MR. HOLT:
3 **Q Exhibit 1039 includes a reference to OCP, but**
4 **does not actually include or show any OCP specification**
5 **document, correct?**
6 MR. KOHLHEPP: Object to form.
7 THE WITNESS: It's correct that Exhibit 1039 does
8 not show the OCP specification. But the point was that
9 we were using OCP and we were familiar with OCP during
10 that time period when we were doing designs and research
11 on that topic in that era.
12 BY MR. HOLT:
13 **Q Let's go back to your second -343 declaration.**
14 A Okay.
15 **Q Actually, let's -- we've been going about an**
16 **hour. So why don't we go off the record and take a**
17 **break.**
18 A Okay.
19 MR. KOHLHEPP: Okay.
20 (Recess.)
21 MR. HOLT: Let's go back on the record.
22 BY MR. HOLT:
23 **Q Dr. Dutt, let's go to your second -343**
24 **declaration at paragraph 13.**
25 A Yes.

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1 **Q In paragraph 13 of your second -343 declaration,**
2 **you state:**
3 **"I understand that Radulescu 2004 was**
4 **uploaded to IEEE Xplore on March 8th,**
5 **2004," and you cite Exhibit 1018.**
6 **Do you see that?**
7 A Yes.
8 **Q Just to confirm, you were not involved in the**
9 **uploading of Radulescu 2004 to IEEE Xplore; is that**
10 **correct?**
11 A That's correct. That's done -- so IEEE, as an
12 organization, has the responsibility of uploading
13 conference proceedings to IEEE Xplore after the
14 conference is over.
15 **Q And you did not access Radulescu 2004 from**
16 **IEEE Xplore on March 8th, 2004, correct?**
17 A I don't recall. You know, I'd have to go back
18 and look but -- I probably didn't download it from
19 IEEE Xplore at that time, but may have done it later in
20 the future, for future use. But I -- I can't say
21 definitively if I did or not. It's so long back that I
22 don't remember.
23 **Q So here in paragraph 13 of your second -343**
24 **declaration, Exhibit 1018 is the only exhibit cited for**
25 **your statement about Radulescu 2004 being uploaded to**

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1 **IEEE Xplore on March 8th, 2004, correct?**
2 A Paragraph 13 is the item that talks about when
3 Radulescu 2004 was uploaded to IEEE Xplore.
4 **Q And your statement about Radulescu 2004 being**
5 **uploaded to IEEE Xplore on March 8th, 2004, in**
6 **paragraph 13 of your second -343 declaration, that**
7 **statement only cites Exhibit 1018 for support, correct?**
8 A That's correct, in this statement, yes. But to
9 recap again, all conference proceedings are uploaded
10 onto IEEE Xplore if they're IEEE conferences.
11 **Q This date of March 8th, 2004, is not mentioned**
12 **anywhere else in your second -343 declaration, correct?**
13 A I'm just looking through to confirm.
14 **Q You do have the digital copy on hand as well --**
15 A Okay.
16 **Q -- that I shared, as a reminder.**
17 A This is Exhibit 343 [sic], right?
18 **Q This is Exhibit 1038, in the -343 --**
19 A Yes. 1038, yes. Okay.
20 Yeah, that appears to be the only reference to
21 March 8 in this particular declaration.
22 **Q Okay. So just to reask, so it's clear, the only**
23 **reference in your second -343 declaration to the date**
24 **March 8th, 2004, is in paragraph 13, correct?**
25 A That is correct.

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1 **Q And the only exhibit cited in paragraph 13 of**
2 **your second -343 declaration is Exhibit 1018, correct?**
3 A That is correct.
4 **Q So it's fair to say that your statement in**
5 **paragraph 13, that you understand Radulescu 2004 was**
6 **uploaded to IEEE Xplore on March 8th, 2004 -- for that,**
7 **you're relying on Exhibit 1018, right?**
8 A If you don't mind, can we pull up Exhibit 1018 so
9 we can look at that --
10 (Speaking simultaneously.)
11 A -- since we're asking about 1018?
12 **Q Yes, but to answer my question first, it's -- you**
13 **would say it's fair that in paragraph 13 of your**
14 **second -343 declaration, your statement about**
15 **understanding Radulescu 2004 to be uploaded to the**
16 **IEEE Xplore on March 8th, 2004, that's based on**
17 **Exhibit 1018, right?**
18 A Yes. But I'd have to look at 1018 again just to
19 confirm.
20 **Q There's no other exhibits cited in paragraph 13,**
21 **right?**
22 A For context, I'd like to look at Exhibit 1018 if
23 you don't mind.
24 **Q Do you recall what Exhibit 1018 is in**
25 **the -343 IPR?**

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1 A I looked at all the exhibits in preparation, but
2 I don't have it at hand, so I'd like to look at that
3 again, if you don't mind, since I'm on record.
4 **Q Yep. I'm uploading now a document that was**
5 **previously marked as Exhibit 1018 in the -343 IPR, which**
6 **is a declaration of Gordon MacPherson. Do you see that?**
7 A I'm opening it. Yes, I see it now.
8 **Q Exhibit 1018 was provided to you by your**
9 **attorneys, correct?**
10 A That is correct.
11 **Q You did not create Exhibit 1018, right?**
12 A I'm not an IEEE person, so I did not create 1018.
13 **Q So in paragraph 13 of your second -343**
14 **declaration, where you state, "I understand that**
15 **Radulescu 2004 was uploaded to IEEE Xplore on March 8th,**
16 **2004," that's based on this Exhibit 1018 that was**
17 **created by someone else and provided to you by your**
18 **attorneys, correct?**
19 A That is correct. But if you -- just to add to
20 that, to clarify, since I'm on record here, if you go to
21 page 4 of Exhibit 1018, this is a downloaded version of
22 this particular paper from IEEE Xplore that shows, at
23 the bottom of the page, "Date Added to IEEE Xplore:
24 08 March 2004."
25 So this is the fact that it was actually uploaded

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1 to IEEE Xplore, and anyone who downloads this particular
2 paper would actually see this as well.
3 **Q You testified earlier that you don't work for**
4 **IEEE, correct?**
5 A That is correct.
6 **Q And you also said that you were not involved in**
7 **the uploading of documents to IEEE Xplore, right?**
8 A Yeah, I do not upload documents to IEEE Xplore.
9 The -- the organization, IEEE -- so if you go back to
10 the statement of Gordon MacPherson, on page 1 -- so
11 it -- it states in 6 and 7 that these publications are
12 made available for public download through IEEE digital
13 library, IEEE Xplore.
14 **Q Let's go back to your second -343 declaration.**
15 A Uh-huh.
16 **Q So you agree that the only mention of March 8th,**
17 **2004, is in paragraph 13 of your second -343**
18 **declaration, right?**
19 A Uh-huh.
20 **Q And the only exhibit cited in paragraph 13 of**
21 **your second -343 declaration is Exhibit 1018, right?**
22 A That is correct.
23 **Q And Exhibit 1018 was provided to you by your**
24 **attorneys and created by someone else, right?**
25 A Well, it's not just -- so just to clarify, this

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1 is not just someone else. This is the authority -- this
2 is the person at IEEE who's responsible for -- he's the
3 director of Board and Governance Policy [sic] of IEEE.
4 So he's an official at the IEEE who can establish the
5 fact that this paper was uploaded on IEEE Xplore. And
6 the date is shown on page 4 of Exhibit 1018.
7 And any -- any POSA who wanted to access this
8 paper would actually find this in the metadata of this
9 paper in the digital library.
10 **Q And are you aware that Mr. MacPherson testified**
11 **in a deposition in the -343 IPR that he cannot attest to**
12 **the accuracy of the metadata in IEEE Xplore?**
13 A I've no knowledge.
14 MR. KOHLHEPP: Object to form.
15 BY MR. HOLT:
16 **Q Dr. Dutt, are you aware that the -343 IPR**
17 **and -338 IPR proceedings that you're testifying for**
18 **today are about the validity of certain patents?**
19 A I realize that I'm providing these declarations
20 in relation to the patents that are being disputed.
21 **Q Your declarations for the -343 and -338 IPRs**
22 **discuss IEEE websites, correct?**
23 A They do discuss IEEE websites.
24 **Q Are you aware that the terms of service for IEEE**
25 **websites includes an express disclaimer, stating that**

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1 **users should not rely on information from IEEE websites**
2 **for purposes of invalidity of a patent?**
3 MR. KOHLHEPP: Object to form.
4 THE WITNESS: I'm not a patent attorney, so I
5 don't look at that. But as a person of -- as a POSA and
6 as an expert in the area, we use IEEE as the definitive
7 resource for IEEE-related conferences and publications.
8 And our whole research enterprise is based on materials
9 that we download and we access through IEEE websites.
10 So we use that as our working reference.
11 BY MR. HOLT:
12 **Q Your work as a POSA does not involve the validity**
13 **of patents, correct?**
14 A That is correct.
15 **Q But you understand that your declarations were**
16 **submitted in the -343 and -338 IPRs that do concern the**
17 **validity of certain patents, correct?**
18 A I provided these declarations to state that
19 certain papers had appeared in a conference, which I had
20 attended, that I had full knowledge of because I was
21 there, and I had access to the proceedings, and I work
22 in the area. And so that was the statement that I made,
23 to say that this paper appeared -- for example, the
24 DATE 2004 instance, the paper from Radulescu had
25 appeared in the proceedings, and that I had received the

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1 proceedings at the conference, and that I'm an expert in
2 the area, and so I provided that piece of information.
3 Likewise, in the other declaration, I attended
4 DATE 2002, as I've done for many DATEs. And, similarly,
5 that paper had appeared in the DATE 2002 conference, I
6 had received a copy of the proceedings, and I can attest
7 to the fact that those papers were in the proceedings
8 and made publicly available.
9 **Q Dr. Dutt, your declarations also discuss IEEE**
10 **websites, not just papers available in the physical**
11 **proceedings at DATE conferences. Do you understand**
12 **that?**
13 A I do.
14 **Q And so your declarations in the -343 and -338 IPR**
15 **proceedings, which concern the validity of patents --**
16 **those declarations discuss information from IEEE**
17 **websites. Do you agree?**
18 A Not all of the information that I state in my
19 declaration refers to IEEE websites. There are some
20 that refer to web pages of researchers, there are some
21 that refer to my own CV, there's some that refer to the
22 Library of Congress, there's some that refer to the
23 United States Copyright Office. And so it's not solely
24 IEEE.
25 **Q Dr. Dutt, I understand it's not solely IEEE, but**

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1 **are you saying that you don't have any opinions as to**
2 **whether Radulescu 2004 was available from the**
3 **IEEE Xplore website?**
4 A I'm sorry. Could you repeat the question?
5 **Q Your declarations do include opinions related to**
6 **the availability of references from, specifically,**
7 **IEEE Xplore, which is an IEEE website. Do you agree**
8 **with that?**
9 A That's correct. Yes.
10 **Q So regardless of whether or not your declarations**
11 **also additionally discuss DATE conference physical**
12 **proceedings, your declarations do discuss IEEE websites,**
13 **correct?**
14 A My declarations do indicate that papers can be
15 downloaded from IEEE Xplore after the conference is
16 over. And I have done that on multiple occasions, as
17 have many researchers -- practicing researchers and
18 experts in the area.
19 So, yes, I have downloaded papers from
20 IEEE Xplore, and currently do do that, as well, in the
21 course of my research, including my own papers.
22 Sometimes I have to go back because I may not have that
23 on hand, so I go to IEEE Xplore and download the paper.
24 **Q Understood. And your declarations, which include**
25 **discussion of IEEE Xplore, were submitted in the -343**

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1 **and -338 IPRs. Do you understand that?**
2 A Yes.
3 **Q And you understand that those IPRs concern the**
4 **validity of certain patents, correct?**
5 MR. KOHLHEPP: Object to form.
6 THE WITNESS: I've not looked at the patents in
7 detail. But I was asked to provide information on this
8 particular paper and my involvement with the DATE
9 conference and my understanding of being able to access
10 papers from IEEE Xplore after the conference, in -- in
11 one of the declarations, for example.
12 BY MR. HOLT:
13 **Q You acknowledged earlier that you understand that**
14 **IPRs concern the validity of -- of certain disputed**
15 **patents. Do you recall that?**
16 A I acknowledge that there is an IPR litigation. I
17 don't understand the technical term, but I understand
18 there is a patent litigation ongoing. But I'm not
19 familiar with the details of that litigation.
20 **Q Do you understand that your declarations, which**
21 **include discussion of IEEE websites, were submitted in**
22 **those IPR proceedings?**
23 MR. KOHLHEPP: I'm going to object. Asked and
24 answered. And also I think you're, kind of, outside the
25 scope of the declarations here.

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1 THE WITNESS: So I -- I don't understand the
2 question and its relevance to the declarations of me.
3 MR. HOLT: Counsel, I'll remind you, no leading
4 the -- the witness or speaking objections.
5 Our position is that the IEEE websites are
6 clearly discussed in the declarations.
7 BY MR. HOLT:
8 **Q Dr. Dutt, can you go to paragraph 14 of your**
9 **second -343 declaration.**
10 A Yes.
11 **Q In paragraph 14 of your second -343 declaration,**
12 **you state that conference proceeding -- sorry, in the**
13 **sentence starting at the bottom of page 10, you state**
14 **that:**
15 **"Conference proceeding papers such as**
16 **Radulescu 2004 that were uploaded to**
17 **IEEE Xplore were available such that**
18 **POSAs like myself using reasonable**
19 **diligence could locate them," correct?**
20 A Yes.
21 **Q As we discussed earlier, you are not involved in**
22 **the uploading of papers to IEEE Xplore; is that right?**
23 A Yes, I'm not involved with that.
24 **Q The Radulescu 2004 document here was identified**
25 **to you by your attorneys, correct?**

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1 A In the context of this declaration, yes. But,
2 you know, it's -- the papers are in the body of NoC
3 work, so -- yeah.
4 **Q So you did not personally search for**
5 **Radulescu 2004 on IEEE Xplore back in 2004, correct?**
6 A I don't remember if I did. I may have. It's
7 hard for me to go back. I may have accessed that paper
8 subsequently, as well, through IEEE Xplore since I work
9 in the area. And so I don't have a recollection. It's
10 hard for me to give you a definitive answer. But I did
11 receive the paper in the proceedings at the conference
12 as part of the proceedings, and the -- the proceedings
13 were uploaded to IEEE Xplore, so they have been made
14 available to public. So that statement is factual.
15 **Q So you understand, my question is not regarding**
16 **papers you had access to at the conference or whether or**
17 **not papers were uploaded to IEEE Xplore.**
18 **My question is specifically: Do you recall**
19 **personally searching for Radulescu 2004 via IEEE Xplore**
20 **in 2004?**
21 A I don't know. It's possible I may have. You
22 know, I'd have to go back -- you know, I mean, I -- I
23 don't even know how I'd be able to go back and check
24 but -- it's been so long ago.
25 You know, we do work in that general area, so if

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1 it's a paper that has relevant information, then it's
2 possible that I or team members in my lab may have
3 accessed the paper through IEEE Xplore. So it's hard
4 for me to give you a definitive answer on that either
5 way.
6 **Q Sitting here today, you have not gone back and**
7 **tried to research whether or not you searched for**
8 **Radulescu 2004 from IEEE Xplore in 2004; is that right?**
9 A I mean, I -- clearly I'm not able to do that. I
10 don't think anyone has that kind of photographic memory.
11 So -- it would be hard -- even if I were to research --
12 try and research that, it would be hard for me to do
13 that unless, you know, I had a history of all my web
14 searches going back 20 years, which I don't.
15 So I -- I can't give you a definitive answer. I
16 may have accessed it. We work in similar areas, so it's
17 possible that team members that we work on -- because
18 oftentimes after a conference, our research group looks
19 at papers in the area, discusses it in lab meetings. So
20 it's quite possible that we may have downloaded that
21 paper if it was of interest and discussed it in our lab
22 meetings. But -- I can't remember.
23 It's common practice for us to do that. Just to
24 close the loop on this question, it's common practice
25 for us, as researchers -- even if I attended a

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1 conference, when I come back, we would, in the lab,
2 discuss all of the papers in related areas and access
3 them and discuss them in lab meetings, subsequent to the
4 meeting. So it's quite possible that we've done it, but
5 I don't have a definitive answer.
6 **Q Dr. Dutt, when did you become an IEEE fellow?**
7 A I'd have to go back and look at my CV, unless I
8 have it in my statement here.
9 **Q Dr. Dutt, look at your second -343 declaration.**
10 **Looking at paragraph 10 --**
11 A Uh-huh.
12 **Q -- you state that you are an IEEE fellow,**
13 **correct?**
14 A I am an IEEE fellow, yes.
15 **Q And you also state in paragraph 10 of your**
16 **second -343 declaration -- you discuss IEEE as early as**
17 **2004. Do you see that?**
18 A Uh-huh. Yes. Since before 2004, yes.
19 **Q I'm uploading now a document that was previously**
20 **marked as Exhibit 2061 in the -343 IPR, which is a copy**
21 **of your CV. Correct?**
22 A I'm downloading it right now. One second. Yes,
23 I have it.
24 **Q If you go to page 2, under "Distinctions."**
25 A Uh-huh.

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1 **Q It shows that you became an IEEE fellow in 2008;**
2 **is that right?**
3 A That is correct.
4 **Q Let's go to your second -343 declaration, and**
5 **paragraph 8, in the next-to-last sentence that starts**
6 **with "Various other sources." Do you see that?**
7 A Yes.
8 **Q So in paragraph 8 of your second -343**
9 **declaration, you state that:**
10 **"Various other sources show...that the**
11 **DATE 2004 conference took place on**
12 **February 16th to the 20th in 2004 and**
13 **that the Radulescu 2004 paper was**
14 **included in the conference proceedings**
15 **that were handed out," correct?**
16 A Yes.
17 **Q And then those various third-party sources are**
18 **listed in the bulleted list under -- or in paragraph 8**
19 **of your second -343 declaration; is that right?**
20 A Yes.
21 **Q The first three bullets in paragraph 8 are for**
22 **Exhibits 1062, 1063, and 1064, and those refer to**
23 **various web pages of Kees Goossens, correct?**
24 A That is correct.
25 **Q And then the -- the next bullet is for**

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1 **Exhibit 1065. And that refers to an online archive of**
2 **the DATE conference, correct?**
3 A Yes.
4 **Q And then the next three bullets are for**
5 **Exhibits 1066, 1067, and 1070. And those refer to**
6 **third-party sources from the Library of Congress and**
7 **IEEE Computer Society Digital Library, correct?**
8 A That's correct.
9 **Q And then the last bullet is for Exhibit 1059,**
10 **which refers to a third-party source from the**
11 **U.S. Copyright Office, correct?**
12 A That is correct.
13 **Q So, Dr. Dutt, you did not create any of these**
14 **third-party sources listed in paragraph 8 of your**
15 **second -343 declaration; is that right?**
16 MR. KOHLHEPP: Object to form.
17 THE WITNESS: I provided information on some of
18 these. For example, on DATE online archives and the
19 IEEE digital -- Computer Society Digital Library. And
20 Kees Goossens, as I mentioned, is an -- I would call him
21 a colleague who works in a similar area of research.
22 And we've accessed his web page many times. So these
23 are familiar sources for us.
24 BY MR. HOLT:
25 **Q Dr. Dutt, my question is more particular, though,**

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1 **you understand. It's not about whether you're familiar**
2 **with them. It's specifically: Did you create these**
3 **third-party sources listed in paragraph 8 of your**
4 **second -343 declaration, including the Goossens websites**
5 **and the DATE conference archive and resources from the**
6 **Library of Congress, U.S. Copyright Office, and**
7 **IEEE computer society?**
8 A So I personally did not create the --
9 MR. KOHLHEPP: Object to form.
10 Go ahead.
11 THE WITNESS: I personally did not create these
12 specific exhibits, but I gave input on several of them,
13 including Kees Goossens's website and the IEEE digital
14 library, as well as the DATE conference archive, which I
15 access quite often to access papers.
16 BY MR. HOLT:
17 **Q These third-party sources listed in paragraph 8**
18 **of your second -343 declaration, including the**
19 **Kees Goossens web pages and other archives, you do not**
20 **know when those were created, correct?**
21 MR. KOHLHEPP: Object to form.
22 THE WITNESS: Are you asking me if I know when
23 Kees Goossens created his website?
24 BY MR. HOLT:
25 **Q You just said that you personally did not create**

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1 **these sources so, thus, you do not know when these**
2 **sources were created; is that right?**
3 MR. KOHLHEPP: Object to form.
4 THE WITNESS: I don't know when these were
5 created. But I do know that Kees Goossens has had an
6 active website for many years that I've accessed over
7 the years.
8 I do know that the digital library has been
9 around for a while, and I've accessed the IEEE digital
10 library of the computer society many times through my
11 institution.
12 I do know that the DATE conference archives have
13 been around for a while. I've been involved with DATE
14 for a long time. And I've accessed them consistently
15 over the years. So I don't know when exactly they were
16 created, but I know they've been around for a while.
17 BY MR. HOLT:
18 **Q Dr. Dutt, did you compare the content of the**
19 **third-party sources in paragraph 8 of your second -343**
20 **declaration with the content of the Radulescu 2004**
21 **document asserted in the -343 IPR?**
22 A Can you -- can you rephrase the question? Are
23 you asking if the paper that appeared in DATE 2004 is
24 the same as the paper that appears in the archives? I'm
25 not sure I understand the question clearly.

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1 **Q In your declaration -- your second -343**
2 **declaration, you discuss the Radulescu 2004, correct?**
3 A That's correct. Yes.
4 **Q Did you compare the substantive content of**
5 **Radulescu 2004 with the substantive content from the**
6 **sources listed in paragraph 8 of your declaration?**
7 A So the answer is I did not compare each version
8 of the paper from these different sources. But as an
9 expert working in the area, these are the places we'd go
10 for getting copies of the paper if we were looking for a
11 paper.
12 So I did not compare them line by line, but I
13 would assume that, as a POSA -- that these particular
14 websites would have the same paper that we're referring
15 to.
16 **Q I've uploaded, Dr. Dutt, a document that was**
17 **previously marked as Exhibit 1005 in the -343 IPR, which**
18 **is a copy of Radulescu 2004, correct?**
19 A Yes.
20 **Q And so you understand that when I refer to**
21 **"Radulescu 2004," I'm referring to this Exhibit 1005,**
22 **okay?**
23 A Okay.
24 **Q The first time you recall seeing this**
25 **Radulescu 2004 was when you became involved in the**

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1 **-343 IPR, correct?**
2 A That is not correct. I've been working in the
3 area for a long time. So it's very likely that I've
4 seen this paper several times in the past in my
5 professional activities.
6 So this particular -- if you're asking if that's
7 the first time I saw the paper, that would be incorrect,
8 because we do work in this area.
9 So there have been -- there would have been
10 opportunities where we had reviewed the paper or
11 discussed the paper, possibly even referenced the paper.
12 I'd have to go back and look at my papers.
13 **Q But you don't have any specific recollection of**
14 **seeing Radulescu 2004 prior to this -343 proceeding,**
15 **correct?**
16 A If you ask me if I remembered seeing this paper
17 at that time, no. I -- I -- I wouldn't have had -- I'd
18 have to go back and dig. Because there are hundreds of
19 papers that we review. And so -- it's probably in the
20 collection of many papers that we've reviewed or used or
21 referred to in the past.
22 **Q What do you mean by "at that time"?**
23 A "At that time" meaning -- after the conference in
24 2004, as I mentioned, my lab oftentimes sits together
25 and reviews papers of interest that have appeared in the

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1 most recent conference. We discuss papers, and then,
2 you know, see what new results have come out.
3 It's very likely that we had discussed this and
4 other papers in the NoC area, because that's the topic
5 that we were working in at that time.
6 And subsequently to 2004, there may have been
7 opportunities where we have used this in references, but
8 I don't have a definitive answer on that right now. I'd
9 have to go back and check my -- all of my papers, I
10 guess.
11 **Q You testified in your first deposition that you**
12 **did not remember ever seeing Radulescu 2004 prior to**
13 **becoming engaged in the -343 IPR. Do you recall that**
14 **testimony?**
15 A I don't recall that. Like I said, there are
16 hundreds of papers. So what I'm saying is if you ask me
17 if I did see it or didn't see it, it's hard for me to
18 give a definitive answer since we work in that area.
19 **Q I direct you to -343, Exhibit 2067, which is your**
20 **first deposition.**
21 A Uh-huh.
22 **Q If you go to page 47. Let me know when you're**
23 **there.**
24 A Okay. Uh-huh.
25 **Q Okay. So page 47, you see at line 3 you were**

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1 **asked, in the first deposition, "Do you recall ever**
2 **reading Exhibit 1005 prior to being engaged in this**
3 **matter?" Do you see that?**
4 A Yes.
5 **Q And then your response at line 6 said:**
6 **"It's possible. You know, I work in**
7 **the area of design automation. And so**
8 **I've reviewed a lot of different pieces**
9 **of work. So it's -- it's quite**
10 **possible. I don't remember at this time**
11 **if I specifically read it, when I read**
12 **it. You know, I've been in the field**
13 **for 35 years. So it's possible I've**
14 **read it, but I don't remember."**
15 **So does that refresh your recollection of your**
16 **testimony in your first deposition of not remembering**
17 **seeing Radulescu 2004 prior to the -343 IPR?**
18 A Yes. And it's -- it's consistent with what I
19 just said a few minutes ago, that I've -- you know, it's
20 exactly what I've said. I've -- I've reviewed a lot of
21 work. Our lab's reviewed a lot of work. I may have
22 seen it, but I can't say definitively if I did see it
23 before or not. So it's consistent with what I said in
24 this statement in lines 7 through 13 on page 47 of
25 Exhibit 2067.

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1 **Q You also testified in your -- in your first**
2 **deposition that you don't remember whether you saw**
3 **the -- the presentation of Radulescu 2004 at the**
4 **DATE 2004 conference. Do you recall that testimony?**
5 A I don't recall the testimony. But it's fair to
6 say that I don't remember if I attended that particular
7 session. Unless -- unless the paper was in a session
8 that I presented at, I -- I wouldn't remember it,
9 because there were many events in parallel. But that
10 paper did appear in the proceedings and was actually
11 handed out in the proceedings and was uploaded to
12 IEEE Xplore.
13 **Q Your first deposition was on August 27th,**
14 **2004 [sic], correct? Do you see at the very first page**
15 **of deposition transcript?**
16 A That's correct. Yes.
17 **Q So now that you've had several months since your**
18 **first deposition, it's fair to say that you still don't**
19 **remember ever seeing Radulescu 2004 prior to the -343**
20 **proceeding; is that correct?**
21 MR. KOHLHEPP: Counsel, I'm going to object to
22 scope here. This deposition is about his current two
23 depositions [sic], not a deposition about his previous
24 deposition. So if you can -- if you have something to
25 ask about his current two declarations, go ahead.

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1 MR. HOLT: His current declarations, Counsel,
2 discuss his deposition and reference his deposition.
3 MR. KOHLHEPP: Okay. We can go ahead --
4 (Speaking simultaneously.)
5 MR. HOLT: The deposition is within the scope of
6 the declarations that are the subject of today's
7 deposition.
8 MR. KOHLHEPP: Point us to where you're
9 referring, please.
10 MR. HOLT: So his second -343 declaration
11 includes explanations regarding his deposition and
12 verifications regarding his deposition. It also
13 discusses the availability of Radulescu 2004, which is
14 the subject.
15 BY MR. HOLT:
16 **Q Dr. Dutt, I'll repeat the question. Is it still**
17 **your testimony that you do not recall whether or not you**
18 **have seen Radulescu 2004 prior to the -343 IPR?**
19 MR. KOHLHEPP: Same objection. Form. Scope.
20 THE WITNESS: Again, I -- I go back to what I
21 said in my prior deposition as well. I -- I've reviewed
22 hundreds of papers that are related to topics that we
23 work on. I may have seen this paper. Maybe not. But I
24 don't have a definitive recollection either way. So
25 it's hard for me to say yes or no that I've seen it. I

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1 may have seen it. Possibly likely that I've seen it
2 since it's in the area, and this work probably has a lot
3 of other related works that are in this -- in that
4 particular session. So -- but I don't have a definitive
5 recollection either way.
6 BY MR. HOLT:
7 **Q Dr. Dutt, if you go to your second -343**
8 **declaration.**
9 A Uh-huh.
10 **Q For example, in paragraph 8 --**
11 A Uh-huh.
12 **Q -- you say that Radulescu 2004 was included in**
13 **the DATE 2004 conference proceedings, correct?**
14 A That is correct. That is a fact. Yes.
15 **Q So I want to ask some questions about the**
16 **statements in your second -343 declaration.**
17 **Your second -343 declaration does not state that**
18 **you personally attended the presentation of**
19 **Radulescu 2004 at the DATE 2004 conference, correct?**
20 A This declaration is a response to the first
21 declaration; is that correct?
22 **Q Are you asking me?**
23 A Yes.
24 **Q What is your understanding?**
25 A My understanding, that this is a follow-up to the

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first declaration. And in the first declaration, I stated very clearly that I had attended the conference in 2004 and I received a copy of the proceedings.

Q My question was more specific. My question is: Your second -343 declaration does not include a statement stating that you personally attended the presentation of Radulescu 2004 at the DATE conference, correct? That statement is not included in your second -343 declaration?

A I attended the presentation of the Radulescu, right? Yeah, I -- I -- it does not state that.

Q Your second -343 declaration does not state that you personally saw Radulescu 2004 within the DATE 2004 conference proceedings, correct?

MR. KOHLHEPP: Object to form.

THE WITNESS: Well, there's -- I don't know how many papers there are in DATE 2004. But it's a fact that when we receive the copy of the proceedings, it has all of the papers that were accepted in that conference. And this is standard practice in IEEE. I've been a chair of many conferences; so -- it has -- it's got to have been in that particular proceedings that was handed to me.

Did I look at it at that time? I don't remember. Maybe I did. Maybe I didn't. But it was definitely in

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the proceedings that was handed out to me.

BY MR. HOLT:

Q So just to clarify, my question is not whether or not Radulescu was included in the proceedings. My question is about what statements are or are not within your declaration.

I just want to clarify, your second declaration does not include a statement stating that you personally saw Radulescu 2004 within the DATE 2004 conference proceedings, correct?

MR. KOHLHEPP: Object to form.

THE WITNESS: Yeah.

BY MR. HOLT:

Q Your second -343 declaration -- strike that.

MR. HOLT: Let's go off the record.

THE STENOGRAPHIC REPORTER: Okay.

(Lunch recess.)

MR. HOLT: Let's go back on the record.

BY MR. HOLT:

Q Dr. Dutt, your -338 declaration discusses the DATE 2002 conference, correct?

A That's correct.

Q And your declarations in the -343 IPR discussed the DATE 2004 conference, right?

A That's correct.

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Q And your first deposition also discussed the DATE 2004 conference, right?

A That's correct.

Q Is it fair to say that the 2002 and 2004 DATE conferences are similar?

A They're -- yes, they're similar in the sense there's -- they're a continuation of the same conference series that's held annually. So the topical coverage broadly is similar. It may change a little bit every year based on emerging new technologies and so forth. But, yeah, they're somewhat similar.

Q Specifically the procedures of the 2002 and 2004 DATE conferences -- would you agree that the procedures of those two conferences are similar?

A Can you clarify what you mean by "procedures" of the conference?

Q Yeah. So, for example, the paper submission process would be similar for both the 2002 and 2004 DATE conferences, correct?

A They should be similar, yes.

Q And also would you agree that the paper distribution process would be similar for the 2002 and 2004 DATE conferences?

A When you say "paper distribution," you mean to attendees or to --

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Q Yes.

A Yes, the process is the same where attendees receive a copy of the proceedings at the time of registration that -- and the proceedings contain all of the papers that appear in that particular event.

Q And you would also agree that the presentation process for the 2002 and 2004 DATE conferences would be similar as well?

MR. KOHLHEPP: Object to form.

THE WITNESS: You know, I'd have to go back and look at the exact schedules, because maybe -- over the years, sometimes the papers have shorter presentations, sometimes they have longer presentations, they're in special sessions. So the overall structure of the conference may remain the same, but the individual paper presentation lengths and requirements for presentations, they may vary from year to year.

BY MR. HOLT:

Q Okay.

A I don't remember exactly if they're exactly the same for 2002 and 2004. I'd have to go back and look at the, maybe, table of contents and maybe look at -- or maybe that might not even say about the paper presentation; maybe the schedule.

Q Yeah. Besides the actual content of the

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1 presentations at the two conferences, but -- otherwise,
2 the procedures, like paper submission, paper
3 distribution to attendees, you know, the -- the
4 presentation sessions and -- and things like that would
5 be similar between the two conferences?
6 MR. KOHLHEPP: Object to form.
7 THE WITNESS: Broadly, yeah. Broadly, yes.
8 BY MR. HOLT:
9 Q Okay. Dr. Dutt, I'm uploading a document that
10 was previously marked as Exhibit 1005 in the -338 IPR,
11 which is a copy of Goossens 2002, correct?
12 A Yes.
13 Q So during this deposition, whenever I refer to
14 "Goossens 2002," I am referring to this exhibit in
15 the -338 IPR. Okay?
16 A Okay.
17 Q Do you recall personally seeing Goossens 2002
18 prior to being engaged in the -338 IPR?
19 A I guess my answer would be similar to the
20 previous paper, the 2004 paper. I may have seen the
21 paper. We may have reviewed the paper after the
22 conference. I may even have attended the session when
23 the paper was presented. But I don't have a definitive
24 recollection.
25 Q Have you read Goossens 2002?

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1 A I glanced through it. I have not read it in
2 detail.
3 Q When you say you "glanced through it," when was
4 that? Was that in preparation for your -- was that in
5 preparing your -338 declaration?
6 A Yes.
7 Q Let's go to your -338 declaration, and
8 paragraphs 21 and 22. Let me know when you're there.
9 A Yeah. Uh-huh.
10 Q Okay. So in paragraphs 21 and 22 of your -338
11 declaration, you state that Goossens 2002 was included
12 in the DATE 2002 conference proceedings given out to the
13 conference participants; is that correct?
14 A Yes.
15 Q Your -338 declaration does not state specifically
16 that you personally looked for or reviewed the
17 Goossens 2002 reference in your personal copy of the
18 DATE 2002 conference proceedings, correct?
19 A I didn't state that I looked for it. But as I
20 mentioned before, the paper was in the proceedings, and
21 I received the proceedings, so it was in -- it was
22 presented at the conference and was in the proceedings.
23 Q All right. So my question is just a little bit
24 more specific.
25 I understand you state in your -338 declaration

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1 that the Goossens 2002 paper was included in the
2 DATE 2002 conference proceedings.
3 My question, though, is: Your -338 declaration
4 does not include a statement stating that you personally
5 reviewed Goossens 2002 in your copy of the DATE 2002
6 conference proceedings, correct?
7 A That statement does not appear in my declaration.
8 Q And you don't recall checking your copy of the
9 DATE 2002 conference proceedings specifically for
10 Goossens 2002, right?
11 A Well, there's no need for me to have to look for
12 it because the paper would have been there in the
13 proceedings, since all papers appearing at that
14 conference were included in the conference proceedings.
15 Q So my question is not whether or not it was
16 included in the proceedings or whether or not you would
17 have needed to check for it.
18 My question was, specifically: Do you recall
19 checking your copy of the DATE 2002 conference
20 proceedings specifically for Goossens 2002?
21 A I don't recall checking for it. I may have,
22 because it appeared in -- I can see from my statement
23 here that it was presented in a hot topics session. And
24 the conference -- DATE conference series, like many
25 other conferences, typically have these special sessions

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1 called "hot topics" that cover topical areas of interest
2 to attendees. And they are very well attended,
3 typically.
4 And so it's very likely that I may have attended
5 the talk, and maybe even looked at the paper at that
6 time. But I do not have definitive recollection of
7 that.
8 Q Okay. So your testimony is that you may have
9 reviewed the Goossens 2002 reference in your copy of the
10 DATE 2002 conference proceedings, but you don't recall;
11 is that correct?
12 A That's a fair statement.
13 Q If we look at paragraph 21 of your -338
14 declaration, in the last sentence, it says that the
15 Goossens 2002 paper was presented at this session of the
16 DATE 2002 conference. Do you see that?
17 A Yes.
18 Q So I understand your declaration says it was
19 presented there, but your -338 declaration does not
20 include a statement that you personally attended a
21 presentation of Goossens 2002 at the DATE 2002
22 conference, correct?
23 A My statement does not -- my declaration does not
24 include a definitive statement that I attended it
25 because I may have attended it, I may have reviewed the

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1 paper, but I don't remember.
2 **Q Okay.**
3 A It's possible since, again, as I mentioned, it's
4 a hot topic session, which is a very well-attended
5 session in the DATE conference series. But I don't -- I
6 don't have definitive recollection. So in -- in my --
7 in this deposition, I'd be not willing to state that I
8 definitely saw it. But I can't say that I definitely
9 didn't see it either.
10 **Q So you don't know who, if anyone, presented the**
11 **Goossens 2002 reference at the DATE 2002 conference; is**
12 **that fair?**
13 MR. KOHLHEPP: Object to form.
14 THE WITNESS: I do know that one of the authors
15 presented it, but I don't know which author. Because
16 one of the authors would have had to present the paper
17 for the paper to have appeared at the conference. So
18 one of the multiple authors -- Goossens, Wielage,
19 Peeters, and van Meerbergen -- one of them had to have
20 presented the paper; otherwise, it wouldn't appear in
21 the conference proceedings.
22 BY MR. HOLT:
23 **Q It's possible that just one author of the**
24 **Goossens 2002 reference would have been scheduled to**
25 **present Goossens 2002 at the DATE 2002 conference. Do**

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1 **you agree with that?**
2 A Yeah, it's possible that one of them -- well,
3 it's definitely the case that one of them definitely
4 presented at the conference. Which one, I don't know.
5 And maybe others attended as well. Which ones, I
6 wouldn't have information on that. But it's a --
7 definitely -- I can say definitely that one of the
8 authors would have had to present at the conference for
9 the paper to appear in the proceedings. And that's a
10 requirement of IEEE for all their conferences.
11 **Q You stated earlier today that you checked a**
12 **travel diary to confirm your travel and flights to the**
13 **conference. Do you recall that?**
14 A I have to remember --
15 MR. KOHLHEPP: Object to form.
16 THE WITNESS: Sorry. Go ahead.
17 Was this for DATE 2004 or DATE 2002? I have to
18 check this. Because one of the --
19 BY MR. HOLT:
20 **Q Within your second -343 declaration,**
21 **paragraph 17, you reference --**
22 A That's the --
23 (Speaking simultaneously.)
24 (Stenographer requested clarification.)
25 //

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1 BY MR. HOLT:
2 **Q To be clear, your reference to your diary and**
3 **flight details is in paragraph 17 of your second -343**
4 **declaration.**
5 A That is correct. And that's for DATE 2004.
6 **Q Right. So you agree that people fly to -- or**
7 **some presenters may be required to fly to the**
8 **DATE conferences, right?**
9 A They're not required to fly, but they're required
10 to be present at the -- one of the authors of any paper
11 that's presented in the conference must physically
12 appear at the conference and present at the conference.
13 They can take the train, if they're in Europe. They can
14 drive. They can fly. They can walk, if they're in the
15 neighborhood. But they have to be present at that
16 conference to present the paper at the conference. One
17 of the authors.
18 **Q Would you agree it's possible to have a flight**
19 **delay or flight cancelation on your way to the DATE 2002**
20 **conference?**
21 A Well, are you asking about my situation?
22 **Q Is it possible that an author scheduled to**
23 **present Goossens 2002 had a flight delay or flight**
24 **cancelation on their way to the DATE 2002 conference?**
25 A I wouldn't have knowledge of that, frankly. But

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1 coming back to the requirements for the conference, even
2 if an author is delayed and cannot make the conference,
3 someone has -- one of the authors have to present;
4 otherwise, the paper does not appear. The paper gets
5 retracted from the conference proceedings if the author
6 did not present at the conference.
7 We've had situations in the past where -- I've
8 chaired conferences where an author did not show up,
9 maybe for no fault of their own, but their paper had to
10 be retracted from the conference proceedings. So -- but
11 I have no knowledge about 2002 and this particular
12 paper.
13 So I would not have knowledge of whether they
14 took a flight -- it's unlikely they took a flight
15 because these authors are from Belgium. So I -- I think
16 they would have taken a train or driven, but -- I don't
17 think they were taking flight. But who knows. Maybe
18 they took a flight.
19 **Q Were you an organizer of the DATE 2002**
20 **conference?**
21 A I was on the technical program committee of the
22 DATE 2002 conference.
23 **Q Were you a conference organizer for the DATE 2002**
24 **conference?**
25 A I was not an organizer of the DATE 2002

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1 conference.
2 **Q The retraction policy that you just mentioned,**
3 **since you weren't an organizer for the DATE 2002**
4 **conference, you wouldn't know if the retraction policy**
5 **applied to the DATE 2002 conference, correct?**
6 A I wouldn't know if they applied that. But I do
7 know that IEEE, as an organization -- professional
8 organization, requires conferences to follow this
9 policy. ACM, which is the other organization, also
10 requires conferences to follow this policy.
11 **Q In paragraphs 20 through 21 of your -338**
12 **declaration, you rely on Exhibit 1039, which is the**
13 **archive website for the DATE 2002 conference, correct?**
14 MR. KOHLHEPP: Object to form.
15 THE WITNESS: Yes.
16 BY MR. HOLT:
17 **Q And in paragraph 21 of your -338 declaration, you**
18 **cite Exhibit 1039 for the statement that Goossens 2002**
19 **was included in the DATE 2002 conference proceedings.**
20 **Do you see that?**
21 A Yes.
22 **Q And then in paragraph 23 of your -338**
23 **declaration, in the next-to-last sentence, you refer to**
24 **various other sources that show the Goossens 2002 paper**
25 **was included in the conference proceedings for the**

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1 **DATE 2002 conference, correct?**
2 A Yes.
3 **Q And you've listed those sources in a bulleted**
4 **list in paragraph 23. Do you see that?**
5 A Yes.
6 **Q So your -- to be clear, your statements in**
7 **your -338 declaration about the Goossens 2002 reference**
8 **being included in the DATE 2002 conference proceedings**
9 **and presented at the conference, those statements are**
10 **based on these exhibits cited in paragraphs 20 and 23;**
11 **is that correct?**
12 MR. KOHLHEPP: Object to form.
13 THE WITNESS: Well, I'm -- I'm a practicing
14 researcher in this area, a longtime attendee of the DATE
15 conference series. So regardless of the Exhibits 1040
16 to 1048, -38 [sic], I would know that if the paper had
17 appeared at the conference, then it would have been
18 included in the conference proceedings and would have
19 been presented at the conference.
20 So that's -- you know, that's my statement as an
21 expert that I'm providing to you as a witness here.
22 BY MR. HOLT:
23 **Q And -- and the -- your way of knowing that the**
24 **Goossens 2002 reference was included in the DATE 2002**
25 **conference proceedings and presented at that conference**

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1 **is based on the DATE conference archive in Exhibit 1039**
2 **and the various sources listed in -- below paragraph 23**
3 **of your -338 declaration; is that fair?**
4 MR. KOHLHEPP: Object to form.
5 THE WITNESS: Yeah.
6 BY MR. HOLT:
7 **Q Okay. So going back to Exhibit 1039 that's**
8 **mentioned in paragraph 20 of your -338 declaration. In**
9 **your first deposition, you testified about a similar**
10 **online archive for the DATE 2004 conference. Do you**
11 **recall that?**
12 A I'm sorry, can we pull up Exhibit 1039 so we can
13 look at what you're talking about?
14 **Q Sure. Apologies, that is the --**
15 A That's the paper, I think.
16 **Q Yeah, that's the wrong one. Sorry.**
17 **Are you not familiar with Exhibit 1039 in**
18 **the -338 IPR based on the URL and description in**
19 **paragraph 20 of your -338 --**
20 (Speaking simultaneously.)
21 (Stenographer requested clarification.)
22 **Q -- declaration?**
23 A Exhibit 1039 is the -- is our paper, right? Is
24 that the one you're referring to? "Fast Exploration of
25 Bus-Based On-chip Architectures" [sic]?

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1 **Q No. Let me see if I can verify.**
2 **Okay. So I've uploaded now a document that was**
3 **previously marked as Exhibit 1039 in the -338 IPR.**
4 A Okay. I have it now.
5 **Q Do you see that?**
6 A Yes.
7 **Q Does that refresh your recollection of what**
8 **Exhibit 1039 is?**
9 A Uh-huh.
10 **Q So going back to your -338 declaration.**
11 A Uh-huh.
12 **Q You discuss this Exhibit 1039 as an online**
13 **archive for the DATE conference for the DATE 2002**
14 **conference, correct?**
15 A That's correct.
16 **Q So in your first deposition in the -334 IPR, you**
17 **testified about a similar online archive for the**
18 **DATE 2004 conference and said that you did not create it**
19 **and did not know when it was created. Do you recall**
20 **that testimony?**
21 MR. KOHLHEPP: Object to form.
22 THE WITNESS: I don't recall the testimony. But
23 I certainly did not create the archive.
24 BY MR. HOLT:
25 **Q Okay. So you agree you did not create the online**

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1 **archive of Exhibit 1039 in the -338 IPR?**
2 A I did not create this --
3 (Speaking simultaneously.)
4 (Reporter requested clarification.)
5 A I did not create this archive. This archive was
6 created by the conference organizers and is maintained
7 by the conference organizers for all past
8 DATE conferences.
9 **Q And you said earlier that you are not a**
10 **conference organizer for the DATE 2002 conference,**
11 **correct?**
12 A That's correct. I served on the technical
13 program committee, but I was not an organizer of the
14 conference.
15 **Q If we go down to paragraph 23 of your -338**
16 **declaration, it includes a bulleted list of three**
17 **sources. Do you see that?**
18 A Uh-huh.
19 **Q The first bullet for paragraph 23 is**
20 **Exhibit 1040, which refers to a web page of**
21 **Kees Goossens, correct?**
22 A Yes.
23 **Q And the next two bullets are for Exhibits 1048**
24 **and 1038. And they refer to third-party sources of the**
25 **Library of Congress and the U.S. Copyright Office,**

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1 **correct?**
2 A That's correct.
3 **Q So similar question as above for the archive.**
4 **You did not create any of these third-party sources**
5 **listed in paragraph 23 of your -338 declaration,**
6 **correct?**
7 MR. KOHLHEPP: Object to form.
8 THE WITNESS: It's true that I didn't create it.
9 But the reason I include them is to demonstrate, again,
10 that the papers did appear -- this paper did appear in
11 the proceedings. They're additional pieces of
12 information that I wanted to add in my statement to
13 establish the fact that the DATE 2002 paper by Goossens,
14 et al., appeared in that proceedings, and that the
15 conference was held in Paris, March 4 through 8, 2002,
16 with the date of publication, et cetera.
17 BY MR. HOLT:
18 **Q But as you stated, you agree that you did not**
19 **create these sources listed in paragraph 23 of your -338**
20 **declaration, correct?**
21 A Yes, I did not create these. But I'm referring
22 to them for additional information. Yes.
23 **Q Did you compare the content of Goossens 2002 to**
24 **the content of these sources listed in paragraph 23 of**
25 **your -338 declaration?**

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1 MR. KOHLHEPP: Object to form.
2 THE WITNESS: Again, you know, I -- I had no
3 reason to compare it, and I did not do it, because these
4 are in -- as a technical person working in the area, as
5 an expert in the area, I would rely on these sources,
6 like the Library of Congress and the United States
7 Copyright Office, as well as, as a professional
8 colleague, the web page of Kees Goossens, as reliable
9 sources of information.
10 So I did not compare, line by line, the papers.
11 But they're the same papers that -- they're -- they
12 refer to the same paper that was published in DATE 2002
13 and presented at the conference DATE 2002 in Paris.
14 BY MR. HOLT:
15 **Q So my question was a little bit narrower. It**
16 **wasn't -- it wasn't whether or not you needed to compare**
17 **them.**
18 **My question was just simply: Did you compare the**
19 **content of Goossens 2002 to the content in these three**
20 **sources listed in paragraph 23 of your -338 declaration?**
21 A So --
22 MR. KOHLHEPP: Object to form.
23 THE WITNESS: Can you clarify what -- which --
24 when you say "Goossens 2002," what are you referring to?
25 Are you referring to the paper that appeared in the

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1 archive?
2 BY MR. HOLT:
3 **Q Do you recall I uploaded Exhibit 1005 from**
4 **the -338 IPR earlier in the deposition?**
5 A Yes. Uh-huh.
6 **Q And you recall that -- whenever I uploaded that**
7 **document, I said during this deposition, whenever I**
8 **refer to Goossens 2002, I'm referring to that exhibit.**
9 **Do you recall that?**
10 A Yes. Got it.
11 **Q So did you compare the content of -338,**
12 **Exhibit 1005, which is Goossens 2002, to the content of**
13 **any of the three sources listed in paragraph 23 of**
14 **your -338 declaration?**
15 A I checked to make sure that the titles matched,
16 that the dates matched, and the conference number
17 matched. So that would establish, from my technical
18 perspective, that the papers are the same, since they
19 come from -- they have the same provenance where they're
20 from, the digital library of the IEEE computer society.
21 **Q Other than the information that you just stated,**
22 **did you compare the subject matter written in the**
23 **Goossens 2002 document to the sources listed in**
24 **paragraph 23 of your -338 declaration?**
25 A Again, as I mentioned, I -- I checked the title

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1 and the conference date and the conference venue and the
2 authors. And for me that -- that establishes that
3 they're the same papers.
4 **Q Can you go to your -338 declaration at**
5 **paragraph 13.**
6 A Uh-huh.
7 **Q There you state that the DATE 2002 conference**
8 **participants received a copy of the conference materials**
9 **either in paper or CD form, correct?**
10 MR. KOHLHEPP: Object to form.
11 THE WITNESS: Yes, that's what I've stated.
12 BY MR. HOLT:
13 **Q You do not recall whether the physical copy of**
14 **the DATE 2002 conference proceedings distributed to**
15 **conference participants was in paper form or CD form?**
16 A I -- I don't remember at this point. I do
17 remember that the conference series, including many that
18 I dealt with, transitioned from paper to CD to fully
19 online -- actually, paper to CD to thumb drive to fully
20 online.
21 So in that evolution, I -- I don't remember where
22 DATE '02 was at this time. But it was definitely handed
23 to me and to all the other participants. The
24 proceedings, in some form -- physical form, was handed
25 to each registrant of the conference during their

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1 registration, and was the case for both DATE 2002 and
2 DATE 2004.
3 **Q So for DATE 2002 conference, you don't recall**
4 **whether or not the conference proceedings were provided**
5 **to participants in paper form or CD form, correct?**
6 A I don't remember if they were in paper or CD, but
7 I remember that one of them, in some form, was handed --
8 in some physical form was handed to each participant at
9 the time of registration.
10 **Q Dr. Dutt, what did you do with your personal**
11 **physical copy of the DATE 2002 conference proceedings**
12 **after the conference?**
13 A Frankly, I -- I don't remember. I may have
14 brought it back with me. I may have looked at the
15 papers, and if they were too heavy, I may have left them
16 there, knowing that I could access the papers later. I
17 do not have recollection of that at this time.
18 **Q Did you try to locate your personal physical copy**
19 **of the DATE 2002 conference proceedings in preparing**
20 **your -338 declaration?**
21 A About five years ago when I moved offices, I -- I
22 basically trashed all of the physical copy of
23 proceedings of all conferences that I hold, since
24 everything is online. So I had no need to go look in my
25 office to see if I had a copy, because I -- even if I

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1 had it, I would have gotten rid of it when I moved
2 offices, since everything is now available through the
3 IEEE digital library as --
4 (Stenographer requested clarification.)
5 A -- as well as through the DATE archives.
6 **Q So you did not retain your personal physical**
7 **copies of the DATE 2002 or DATE 2004 conference**
8 **proceedings after moving offices five years ago?**
9 A I don't remember if it was five years. But when
10 I moved offices, I -- I essentially downsized my
11 library, if you will, and eliminated anything that I
12 could access electronically. So if I had those in my
13 possession at the time before my move, I would have
14 gotten rid of it at that time. But I don't remember if
15 I did have it or not, again. I don't remember if I
16 brought it with me from Paris or if I left it there.
17 That's also a question that I can't answer at this
18 point.
19 **Q And when you were preparing your -338**
20 **declaration, you did not try to recover your physical**
21 **personal copy of the conference proceedings; is that**
22 **fair?**
23 A I had no need to do that because I went directly
24 to the IEEE digital library and the data archive to
25 access the paper. In fact, I rarely, you know, have a

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1 need to access the physical copy anymore.
2 **Q So my question is different and more specific.**
3 **It's not asking whether or not you needed to.**
4 **I'm asking, whenever you were preparing your -338**
5 **declaration, did you try to locate or recover your**
6 **personal physical copy of the DATE 2002 conference**
7 **proceedings?**
8 A As I mentioned, I -- I -- I had no need to look
9 for it because I knew I had gotten rid of all of my
10 physical proceedings when I moved offices, because I
11 could access everything electronically through the DATE
12 archive and through the IEEE digital library.
13 **Q So, again, you're answering about not needing to,**
14 **but my question is not whether or not you needed to.**
15 **My question is, specifically, whenever you were**
16 **preparing your -338 declaration, did you try to locate**
17 **or recover your personal physical copy of the DATE 2002**
18 **conference proceedings?**
19 A Again, I'll respond, saying I did not have the
20 need to do it, so I wouldn't have tried to do it because
21 I went directly to the IEEE digital library and the DATE
22 archive to access the electronic version, knowing full
23 well that I don't keep the proceedings with me anymore.
24 **Q So the answer to my question is no, correct?**
25 MR. KOHLHEPP: Object to form.

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1 THE WITNESS: I mean, the -- the way you're
2 asking it is, did I look for it? And the answer is, I
3 didn't have to look for it, so -- I didn't look for it
4 because I didn't have to look for it. Because I have
5 other means of accessing it and I know that I don't have
6 it in my possession anymore.
7 BY MR. HOLT:
8 **Q Dr. Dutt, would you agree that it's possible that**
9 **the physical copies of DATE conference proceedings**
10 **handed out to attendees at the conference could include**
11 **some additional item not included in the archive digital**
12 **copies of the conference proceedings?**
13 MR. KOHLHEPP: Object to form.
14 THE WITNESS: That's a broad statement. I -- I
15 don't know. There could be advertisement from sponsors.
16 There might be a call for papers for the next event. So
17 there may be stuff that is not technical, that's not
18 related to the con's program. It's possible. But,
19 again, since I don't have a physical copy of the
20 proceedings, it's hard for me to answer that question.
21 BY MR. HOLT:
22 **Q So it's possible that the physical copies of the**
23 **DATE conference proceedings that were handed out to**
24 **attendees could have some additional item, like an**
25 **advertisement or a message from the conference**

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1 **organizers or a call for papers or something of that**
2 **sort, correct?**
3 A That's a fair statement.
4 MR. KOHLHEPP: Object to form.
5 THE WITNESS: Yeah, that's a fair statement.
6 BY MR. HOLT:
7 **Q And as you said, because you don't have your**
8 **physical personal copy of the proceedings from the 2002**
9 **or 2004 DATE conferences, you would not be able to**
10 **confirm whether or not such additional material was**
11 **included with those physical copies; is that fair?**
12 A I'm wondering where these --
13 MR. KOHLHEPP: Object to form.
14 THE WITNESS: -- questions are coming from,
15 because this is -- this has got nothing to do with my
16 statement about the DATE 2002 paper, Goossens appearing
17 in the conference proceedings, and the DATE 2004 paper
18 appearing in the conference proceedings. So I'm not
19 sure where this line of questioning is going. And so
20 I am uncomfortable answering questions for which I don't
21 have answers and don't see the relevance to the
22 statements that I've made, and for this deposition.
23 BY MR. HOLT:
24 **Q Do you agree that your declarations address the**
25 **physical conference proceedings that were handed out to**

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1 **participants, correct?**
2 A That is correct.
3 **Q And as you said earlier, you do not have your**
4 **copy of the physical conference proceedings, and so you**
5 **would not be able to confirm if there was additional**
6 **material included with those physical copies; is that**
7 **correct?**
8 A Quite possible. I don't know.
9 **Q I'm uploading now a document that has been**
10 **premarked as Exhibit 2068 in the -338 IPR. Do you see**
11 **this?**
12 A Yes. I have it open here.
13 **Q Do you see at the top of Exhibit 2068 for**
14 **the -338 IPR that it says "All DATE proceedings are**
15 **accessible from the DATE venue and will be publicly**
16 **available two years after DATE"? Do you see that?**
17 A Yes.
18 **Q Do you recall discussing this document in your**
19 **first deposition?**
20 A In the deposition 1038?
21 **Q Yes. I'm not asking you to look at the**
22 **deposition.**
23 A Oh, in the deposition. Sorry, in -- in the first
24 deposition. I'm sorry.
25 **Q Yeah. I'm asking: Do you recall seeing this**

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1 **document then?**
2 A I don't remember. Maybe I did.
3 **Q Okay. Based on this document, is it your**
4 **understanding that the DATE conference proceedings**
5 **become publicly available to non-attendees two years**
6 **after the conference?**
7 A No, that is --
8 MR. KOHLHEPP: Object to form.
9 THE WITNESS: That is not correct. "Meanwhile,
10 you will find the current proceedings at IEEE Xplore
11 Digital Library or ACM Digital Library."
12 So anyone who has access to IEEE digital library
13 or ACM digital library can access the papers after the
14 conference.
15 What this document says here at the top is that
16 DATE additionally also presents -- makes the papers
17 available to the general public through their own
18 website two years after DATE. That's what this is
19 saying.
20 BY MR. HOLT:
21 **Q When you say DATE's own website, are you**
22 **referring to the DATE online archive?**
23 A It says "All DATE proceedings are accessible from
24 the DATE venue," so -- based on what they're saying
25 here -- whatever they mean by "DATE venue" is where they

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1 would be able to access it. Since I didn't present
2 this, I don't know what they're referring to. But I'm
3 just reading what you've presented here. And so -- it
4 says "All DATE proceedings are accessible from the DATE
5 venue and will be publicly available two years after
6 DATE."
7 **Q A second ago you said that publicly available, as**
8 **stated in this Exhibit 2068, refers to the DATE website.**
9 **Do you recall that?**
10 A The DATE venue, yeah.
11 **Q Whenever you refer to the "DATE website," you're**
12 **referring to the DATE online archive?**
13 A DATE -- the DATE online archive is accessible
14 from the DATE website. So if you go to the DATE
15 website, it has links to the DATE online archive, it has
16 links to the current conference, it has links to past
17 conferences, et cetera.
18 **Q And according to this Exhibit 2068, that DATE**
19 **archive would have DATE proceedings two years after the**
20 **DATE conference. That's what this is stating here,**
21 **correct?**
22 A That's what it appears to say. It doesn't say
23 exactly where, but it says "and will also be publicly
24 available two years after DATE." I'm going with what is
25 written here. I'm not sure what the question was. But

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1 if you're asking what this statement says, it says the
2 proceedings are accessible from the DATE venue and will
3 also be available -- publicly available two years after
4 DATE.
5 But just to add to that, regardless of that, the
6 papers are still available after the conference through
7 IEEE Xplore and through the ACM digital library. Even
8 if a person did not attend the conference, they can
9 access this -- the papers from these digital libraries.
10 **Q Let's go to your -338 declaration at**
11 **paragraph 26. You let me know when you're there.**
12 A Yeah.
13 **Q In paragraph 26 of your -338 declaration, you**
14 **state:**
15 **"I understand that Goossens 2002 was**
16 **added to IEEE Xplore on 07 August 2002," and you**
17 **cite Exhibits 1026 and 1025 for that statement, correct?**
18 A Uh-huh.
19 **Q There are no other exhibits cited in paragraph 26**
20 **of your -338 declaration, correct?**
21 A Not for that paragraph.
22 **Q And that date of August 7th, 2002, is not**
23 **mentioned anywhere in your -338 declaration, other than**
24 **paragraph 26; is that correct?**
25 A I have to do an online check to make sure.

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1 -338 -- you said -338? Let me see. That was the
2 second one that you sent me. Yeah, here it is. -338.
3 So could you repeat the question again so I can
4 confirm?
5 **Q Yes. The date of August 7th, 2002, is not**
6 **mentioned anywhere in your -338 declaration, other than**
7 **paragraph 26, correct?**
8 A That is correct.
9 **Q Paragraph 26 of your -338 declaration says that**
10 **you understand that Goossens 2002 was added to**
11 **IEEE Xplore on August 7th, 2002, not that you accessed**
12 **Goossens 2002 from IEEE Xplore on that date, correct?**
13 A That's a fair statement.
14 **Q As you testified earlier today, you were not**
15 **involved with the uploading of documents to IEEE Xplore;**
16 **is that right?**
17 A Yes.
18 **Q So it's fair to say that your understanding that**
19 **Goossens 2002 was added to IEEE Xplore on this date of**
20 **August 7th, 2002, is based on Exhibits 1026 and 1025 in**
21 **your -338 declaration, correct?**
22 A That is correct. And perhaps we should open
23 those exhibits just to confirm again, 1025 and 1026.
24 Did you send those already?
25 **Q No. I was just uploading one now. You were a**

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1 **little ahead of me.**
2 **But I've now uploaded a document that was**
3 **previously marked as Exhibit -- Exhibit 1025 in the -338**
4 **IPR, which is a declaration of Gordon MacPherson. Do**
5 **you see that?**
6 A Yes.
7 **Q Do you agree that you did not create this**
8 **Exhibit 1025 in the -338 IPR, correct?**
9 A That's correct.
10 **Q Exhibit 1025 in the -338 IPR was provided to you**
11 **by your attorneys, correct?**
12 A That's correct.
13 **Q Exhibit 1025 does not mention the date**
14 **August 7th, 2002, correct?**
15 A It doesn't appear to mention that date.
16 **Q So would you agree that this Exhibit 1025 in the**
17 **-338 IPR does not show that Goossens 2002 was uploaded**
18 **to IEEE Xplore on that date of August 7th, 2002?**
19 MR. KOHLHEPP: Object to form.
20 THE WITNESS: Can you go back to the declaration
21 again for a minute?
22 BY MR. HOLT:
23 **Q Can you answer my question first?**
24 A Could you repeat the question again?
25 **Q Yes. So my question was: This Exhibit 1025 --**

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1 **which doesn't include the date of August 7th, 2002 --**
2 **does not show that Goossens 2002 was uploaded to**
3 **IEEE Xplore on that date of August 7th, 2002. Would you**
4 **agree with that?**
5 MR. KOHLHEPP: Object to form.
6 THE WITNESS: That's a correct statement. But
7 I'd like to revisit that statement, paragraph 26, by
8 looking at Exhibit 1026 and Exhibit 1025 together,
9 because they are listed together in that statement.
10 BY MR. HOLT:
11 **Q My question was just about Exhibit 1025 alone.**
12 **Do you understand that?**
13 A I understand that. But I want to make the case
14 that that statement that I made was in the context of
15 the paper 2002 added to IEEE Xplore with these two
16 exhibits, so I would like to, respectfully, ask to see
17 Exhibit 1026 as well.
18 **Q I don't have any questions about Exhibit 1026 at**
19 **this time, so we'll move on.**
20 MR. KOHLHEPP: Hang on, Counsel. He's asked to
21 see an exhibit to provide a complete answer to your
22 previous question, so you need to show him the exhibit,
23 please.
24 BY MR. HOLT:
25 **Q Dr. Dutt, do you recall what Exhibit 1026, cited**

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1 **in paragraph 26 of your -338 declaration, refers to?**
2 MR. KOHLHEPP: Counsel, he just asked you to see
3 it.
4 THE WITNESS: If I could take a look at --
5 (Speaking simultaneously.)
6 MR. KOHLHEPP: This isn't a memory test.
7 MR. HOLT: Before we look at an exhibit, I can
8 ask if the witness recalls what the exhibit is, Counsel.
9 Counsel, please limit yourself to nonspeaking
10 objections.
11 THE WITNESS: I recall seeing all of these
12 exhibits, but I don't have infinite memory. So I'd like
13 to, respectfully, request to see Exhibit 1026, together
14 with 1025, to follow up on the previous questions that
15 you asked, in the interest of completeness.
16 BY MR. HOLT:
17 **Q Dr. Dutt, I'm now uploading a copy of**
18 **Exhibit 1026 from the -338 IPR, which is a printout of**
19 **an IEEE web page. Do you see that?**
20 A Thank you. Yes, I see it.
21 **Q Does this refresh your recollection of what**
22 **Exhibit 1026 constitutes?**
23 A Yes. And so now both 1025 and 1026 together --
24 as I stated in my declaration -- together establish that
25 this paper was added to IEEE Xplore on 07 August 2002,

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1 as shown in Exhibit 1026, in conjunction with the
2 statement of Gordon MacPherson, who states the process
3 of uploading items onto the IEEE digital library, in
4 declaration -- in Exhibit 1018 --
5 (Speaking simultaneously.)
6 **Q Dr. Dutt --**
7 (Reporter requested clarification.)
8 A Sorry. Exhibit 1026, with 1025, I'd like to see
9 both together to make the case that I understand that
10 Goossens 2002 was added to IEEE Xplore on 07
11 August 2002, and referred to the two exhibits that
12 together made my determination of the fact that that
13 particular paper was added to IEEE Xplore on
14 07 August 2002.
15 MR. HOLT: Ms. Kamalski, did you get that?
16 THE STENOGRAPHIC REPORTER: I did.
17 BY MR. HOLT:
18 **Q Dr. Dutt, can you turn your attention to**
19 **Exhibit 1025. And in the -338 IPR.**
20 A 1025 is the one you just sent a minute ago,
21 right? Yes, I have it here.
22 **Q There is no reference in Exhibit 1025 to an**
23 **Exhibit 1026, correct?**
24 A Item 7 of Exhibit 1025 reads:
25 "It is the regular practice of IEEE to

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1 publish articles and other writings
2 including article abstracts and make
3 them available to the public through
4 IEEE Xplore."
5 1018 --
6 (Speaking simultaneously.)
7 A Please let me finish. Exhibit 1018 shows -- not
8 1018, I'm sorry -- Exhibit 1026 shows a screenshot of
9 this DATE '02 paper downloaded from IEEE Xplore that
10 shows the date of conference and the date added to
11 IEEE Xplore.
12 So together these two exhibits establish the fact
13 that the paper was indeed uploaded into IEEE Xplore on
14 07 August 2002. Sorry. I've finished now.
15 MR. HOLT: Move to strike that response as
16 nonresponsive.
17 BY MR. HOLT:
18 **Q Dr. Dutt, you understand my question was much**
19 **more specific and referred only to Exhibit 1025. And it**
20 **says: In Exhibit 1025, there is no reference to**
21 **Exhibit No. 1026, correct?**
22 A That is correct. They're independent references.
23 And it was my statement that mentioned both those two
24 references, again, to establish the upload date of
25 DATE 2002 paper in the IEEE Xplore.

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1 **Q So you agree that the Exhibit No. 1026 is not**
2 **mentioned in Exhibit 1025, correct?**
3 MR. KOHLHEPP: Object to form.
4 THE WITNESS: Yeah.
5 BY MR. HOLT:
6 **Q You stated earlier that you did not create**
7 **Exhibit 1025 and that it was provided to you by your**
8 **attorneys, correct?**
9 A That is correct.
10 **Q You also did not create Exhibit 1026, correct?**
11 A That is correct.
12 **Q Exhibit 1026 was provided to you by your**
13 **attorneys, correct?**
14 A That is correct.
15 **Q You did not independently find Exhibit 1026 on**
16 **your own before it was provided to you by your**
17 **attorneys, correct?**
18 A It's hard for me to answer that question, again,
19 because we were reviewing this article, I may have
20 downloaded this paper from this website in the past. I
21 may have accessed this. As I mentioned, I've -- I did
22 attend DATE 2002. Our lab did discuss papers. I may
23 have accessed this paper multiple times, and this
24 particular website, through IEEE Xplore multiple times
25 in the past. So I cannot definitively answer if I never

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1 accessed this particular paper through IEEE Xplore
2 before. It's very likely that I may have, but I don't
3 have recollection of that.
4 **Q My question is not whether you accessed this web**
5 **page shown in Exhibit 1026.**
6 **My question is: This Exhibit 1026 was not**
7 **independently found by you but, rather, provided to you**
8 **by your attorneys, correct?**
9 A That is correct.
10 **Q You don't know when this Exhibit 1026 was**
11 **created, correct?**
12 A No. But it is downloaded from -- I mean, it
13 appears to be, as I mentioned -- I understand that this
14 is what you would see if you did an institutional
15 sign -- institutional sign-in into IEEE Xplore, and
16 accessed the paper, this is what you would see.
17 MR. HOLT: Let's -- we've been going about an
18 hour. Let's take another break and go off the record.
19 MR. KOHLHEPP: Okay.
20 THE WITNESS: Sounds good.
21 (Recess.)
22 MR. HOLT: Let's go back on the record.
23 BY MR. HOLT:
24 **Q Dr. Dutt, did you discuss your deposition with**
25 **anyone over the break?**

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1 A No.
2 **Q Okay. And you haven't discussed your deposition**
3 **with anyone over any of the breaks today?**
4 A I have not.
5 **Q Okay. Dr. Dutt, let's go to your -338**
6 **declaration at paragraph 27, and the last sentence.**
7 A Yes.
8 **Q Do you see in the -- in the last sentence of**
9 **paragraph 27 of your -338 declaration, you state that:**
10 **"Conference proceeding papers such as**
11 **Goossens 2002 that were uploaded to IEEE**
12 **Xplore (see paragraph 26 above) were**
13 **available such that POSAs like myself**
14 **using reasonable diligence could locate**
15 **them," correct?**
16 A Yes.
17 **Q The Goossens 2002 document was brought to your**
18 **attention for the -338 IPR by your attorneys, correct?**
19 A Yes.
20 **Q You do not recall personally searching for**
21 **Goossens 2002 on IEEE Xplore in 2002, correct?**
22 A I think, as I mentioned earlier in my -- in -- in
23 this deposition, it's possible that I may have. It's
24 quite likely and possible that I may have accessed the
25 paper multiple times, possibly during the conference and

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1 after the conference, since this was a hot topics paper
2 and -- as we oftentimes discuss in the lab papers that
3 are of interest to us. So it's -- it's possible and
4 likely, but I don't have a recollection of downloading
5 the paper explicitly from IEEE DL.
6 **Q So your testimony is it's possible, but you don't**
7 **specifically recall whether you searched for**
8 **Goossens 2002 and downloaded it from IEEE Xplore back in**
9 **2002; is that right?**
10 A That's a fair statement, yes.
11 **Q Dr. Dutt, during your first deposition, you were**
12 **asked about whether you received research grants from**
13 **Qualcomm. Do you recall that?**
14 A I recall there was a question on that during the
15 deposition.
16 **Q And --**
17 MR. KOHLHEPP: Object to form. Scope.
18 BY MR. HOLT:
19 **Q Do you recall that you testified in your first**
20 **deposition that you have received at least $200,000 of**
21 **unrestricted research gifts from Qualcomm?**
22 MR. KOHLHEPP: Object to form. Scope.
23 THE WITNESS: It's in my CV. I've received money
24 from many different companies that I work with in
25 unrestricted research grants. And the keyword there is

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1 "unrestricted," which means that there's -- by UC
2 definition of "unrestricted funds," there can be no
3 agreement for any kind of services or activity. It's
4 just a gift to support research.
5 So, yes, I have received money from Qualcomm,
6 from Hitachi, from Intel, from many other companies over
7 the career -- over my 34-year career.
8 BY MR. HOLT:
9 **Q I've uploaded a document that was previously**
10 **marked as Exhibit 1045 in the -338 IPR. And this is a**
11 **copy of your CV, dated December 23rd, 2022. Do you see**
12 **that?**
13 A Exhibit 1045?
14 **Q Yes.**
15 A Yes, I see it.
16 **Q Okay. So if I refer to "your CV," you'll**
17 **understand that I'm referring to this Exhibit 1045 from**
18 **the -338 IPR?**
19 A Yes.
20 **Q Okay. Can you go to page 32 of your CV.**
21 A Yes.
22 **Q Do you see in the fourth, sixth, and eighth**
23 **listed items on page 32 of your CV, there are listed**
24 **three unrestricted research gifts from Qualcomm for the**
25 **amounts of 100,000, 140,000, and $60,000? Do you see**

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1 **that?**
2 A Yes.
3 **Q So you agree that you've received at least**
4 **$200,000 in unrestricted research gifts from Qualcomm,**
5 **correct?**
6 A That is correct.
7 **Q Have you received any additional research gifts**
8 **from Qualcomm since December 23rd, 2022?**
9 A I don't see any listed in my CV. Not from
10 Qualcomm. I have, since then, from other companies.
11 **Q Dr. Dutt, you understand that this CV is dated**
12 **December 23rd, 2022. So I'm asking --**
13 A Uh-huh.
14 **Q -- have you received any additional research**
15 **gifts from Qualcomm since the date of this CV?**
16 A I'm sorry. I didn't understand. Sorry. No, I
17 have not received any research gifts from Qualcomm since
18 2022. Apologies. I misunderstood that question.
19 **Q You did not disclose any of your research gifts**
20 **from Qualcomm in your declarations, correct?**
21 MR. KOHLHEPP: Object to form.
22 THE WITNESS: I mean, I -- I have a copy of my CV
23 that lists all of the gifts that I've received from all
24 companies that I've worked with. So -- it's in the
25 packet of information that's there already.

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1 BY MR. HOLT:
2 **Q You submitted your declaration -- or you prepared**
3 **your declarations in the -338 IPR and -343 IPR for**
4 **attorneys representing Qualcomm in those proceedings.**
5 **Do you understand that?**
6 MR. KOHLHEPP: Object to form.
7 THE WITNESS: I guess. I've been working with
8 counsel on this.
9 BY MR. HOLT:
10 **Q Do you understand that your counsel represent**
11 **Qualcomm in the -338 and 343 IPRs?**
12 A Yes.
13 **Q But you did not disclose your gifts from Qualcomm**
14 **in your declarations, just to be clear, correct?**
15 A These are unrestricted --
16 MR. KOHLHEPP: Object to form.
17 Go ahead.
18 THE WITNESS: So just to clarify, we have
19 different types of funding mechanisms in the university,
20 to clarify. Contracts and grants have contractual
21 agreements and require indication of IP and -- and any
22 kind of outcome. So those are different beasts.
23 Unrestricted gifts are mechanisms where
24 companies, organizations, individuals can give money
25 with absolutely no ties, no expectation, no

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1 deliverables, and so they're truly unrestricted.
2 And so -- it's just a gift that I got from
3 Qualcomm, as I've gotten from many of the companies, you
4 can see, in my career, I've got it from Hitachi, I've
5 got it from Accenture, from Facebook.
6 So there are many of these gifts that are
7 unrestricted.
8 And so -- it's in my CV. And anyone who can look
9 at it, can see that these are unrestricted gifts, with
10 no -- no engagement with the company that delivers that
11 unrestricted gift.
12 MR. HOLT: I'll move to strike as nonresponsive.
13 BY MR. HOLT:
14 **Q Dr. Dutt, I'm not asking about the -- the type of**
15 **gifts or anything like that.**
16 **My specific question is: These gifts you**
17 **received from Qualcomm, they are not mentioned in your**
18 **declarations, correct?**
19 MR. KOHLHEPP: Object to form. Asked and
20 answered.
21 THE WITNESS: Yeah.
22 BY MR. HOLT:
23 **Q Dr. Dutt, do you also recall -- strike that.**
24 **I've just uploaded a document that has been**
25 **previously marked as Exhibit 2069 in the -338 IPR. This**

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1 is an article titled "Software and Hardware
2 Implementation of Lattice-based Cryptography Schemes,"
3 co-authored by you, Dr. Dutt.
4 Do you see that?
5 A Yes.
6 Q On page 2 of this article in Exhibit 2069, the
7 list of co-authors shows that two of your co-authors for
8 this article, Indranil Banerjee and Rosario Cammarota,
9 were affiliated with Qualcomm Technologies, correct?
10 A Yes.
11 Q So you have -- so you agree that you have
12 co-authored publications with Qualcomm employees,
13 correct?
14 MR. KOHLHEPP: Object to form.
15 THE WITNESS: Just to be clear, I co-author
16 articles with several industry people, including
17 Qualcomm, Intel, other people. Some of them give gifts,
18 unrestricted gifts. Some don't. There's absolutely --
19 if there's an insinuation that there's a connection
20 between the two, let me be clear: There is absolutely
21 no connection between the gifts that are given and the
22 research that goes on. Whether the company had given
23 money or not, we work with researchers across the
24 spectrum in industry, and we publish papers.
25 So this particular paper was with Francesco

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1 Regazzoni from ALaRi; Sandip Ray from University of
2 Florida; two of us from UCI; and two collaborators at
3 Qualcomm.
4 And we've had multiple such engagements with
5 industries in the past, irrespective of their -- of
6 their companies. Maybe they're different arms of the
7 company that have given unrestricted gifts to me as a
8 researcher.
9 BY MR. HOLT:
10 Q Dr. Dutt, you understand my question is solely
11 limited to this article and it's much more specific.
12 And my question was simply: You have co-authored
13 articles with Qualcomm employees or affiliates, correct?
14 A Yes, I have.
15 Q Do you see in the footnote on page 2 of
16 Exhibit 2069, the footnote states that, "This work was
17 supported in part with a gift from Qualcomm Research,"
18 correct?
19 A Yeah.
20 Q So this article that you co-authored with
21 Qualcomm employees was supported in part by a gift from
22 Qualcomm, correct?
23 A Yeah.
24 Q Do you still have your copy of the Exhibit 1045,
25 which was your CV?

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1 A Yes.
2 Q So based on your CV, I understand that you
3 currently work at UC Irvine, correct?
4 A That is correct.
5 Q How long have you worked at UC Irvine?
6 A I've been employed at UC Irvine since 1989. And
7 that's shown on page 1 of my CV. If you go to page 1 of
8 Exhibit 1045, you can see that since January of 1989
9 I've been employed at UC Irvine.
10 Q And what is your current position at UC Irvine?
11 A I'm currently a distinguished professor of
12 computer science, cognitive sciences, and EECS.
13 Q What is EECS?
14 A EECS stands for electrical engineering and
15 computer science.
16 Q So you're familiar with the computer science
17 department and the E- -- the EECS department; is that
18 right?
19 A I have an appointment in both, yes.
20 Q Let's go to page 95 of your CV. I direct your
21 attention to the fourth item above School-Level Service
22 at the bottom, which starts with "Cofounder." Do you
23 see that?
24 A Yes.
25 Q This says that you are the cofounder of the

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1 Irvine Research Unit in computer systems design, UCI,
2 with N. Bagherzadeh and others.
3 Do you see that?
4 A I do.
5 Q Do you know Dr. Nader Bagherzadeh?
6 MR. KOHLHEPP: Object to form. Scope.
7 THE WITNESS: I mean, he's a colleague of mine in
8 electrical and computer engineering -- electrical
9 engineering and computer science.
10 BY MR. HOLT:
11 Q So Dr. Bagherzadeh is a colleague of yours in the
12 EECS department; is that right?
13 A Yes.
14 Q So you and Dr. Bagherzadeh are colleagues within
15 the EECS department at UC Irvine, right?
16 MR. KOHLHEPP: Object to form. Scope.
17 THE WITNESS: Yes, I -- I don't know where this
18 line of questioning's going with regard to my
19 declarations. I really don't understand this. But the
20 answer is yes, he's a colleague in a department that I
21 work in.
22 BY MR. HOLT:
23 Q Do you know Dr. Bagherzadeh by reputation?
24 MR. KOHLHEPP: Object to form. Scope.
25 THE WITNESS: Again, I'm wondering where this

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1 line of questioning is going. And, you know, I -- he's
2 a colleague of mine. He teaches classes. So I know
3 him.
4 But, again, I'm wondering where -- you know, what
5 relationship does this have to my declarations? I'm not
6 clear why I'm answering these questions. So I just want
7 to put that on the record.
8 BY MR. HOLT:
9 **Q Yeah. Your counsel can lodge objections on your**
10 **behalf.**
11 A Okay.
12 **Q Is it -- so you would -- so would you say that**
13 **Dr. Bagherzadeh has a reputation of someone skilled in**
14 **electrical engineering and computer science?**
15 MR. KOHLHEPP: Object to form. Scope.
16 THE WITNESS: I mean, he's a professor of
17 computer -- electrical engineering and computer science.
18 BY MR. HOLT:
19 **Q What is Dr. Bagherzadeh's reputation within the**
20 **department at UC Irvine?**
21 MR. KOHLHEPP: Object to form. Scope.
22 THE WITNESS: I -- I don't think I'm prepared to
23 talk about Dr. Bagherzadeh or anyone else who's not
24 related to the declaration that I have here that I'm
25 discussing today.

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1 Sorry. My -- apologies. I'm trying to turn off
2 my phone. Sorry about that.
3 Again, I -- I'm not comfortable answering on
4 record questions about individuals with -- for whom I've
5 not done research on and answering, off the cuff,
6 questions on people's reputation or record without
7 reviewing and refreshing myself on that topic.
8 So I -- I -- I don't feel comfortable answering
9 that question. He is a colleague and a professor of
10 computer -- electrical engineering and computer science
11 at UCI. That, I can state for sure.
12 BY MR. HOLT:
13 **Q Can you go to your -338 declaration, and**
14 **paragraph 2.**
15 A Uh-huh.
16 **Q In paragraph 2, you state:**
17 **"I understand that for this matter, a**
18 **person of ordinary skill in the art," or**
19 **POSA, "would typically have had at least**
20 **a bachelor's degree in computer science,**
21 **electrical engineering, computer**
22 **engineering, or an equivalent technical**
23 **degree, and two or more years of**
24 **experience with system-on-chip,**
25 **interconnect, or networking**

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1 **technologies."**
2 **Is it fair to say that Dr. Bagherzadeh is a**
3 **person of ordinary skill in the art, like yourself,**
4 **according to this definition of a POSA?**
5 A Again, I'm not prepared --
6 MR. KOHLHEPP: Object to form. Scope.
7 THE WITNESS: Sorry. Go ahead.
8 I'm not prepared to talk about things that I
9 haven't studied in detail.
10 Dr. Bagherzadeh is a professional colleague in
11 the Department of Electrical and Computer Engineering --
12 Electrical Engineering and Computer Science. But I have
13 not studied his résumé to be able to opine on this
14 particular aspect, so I'm not comfortable making a
15 statement on that on the record.
16 BY MR. HOLT:
17 **Q Okay. So let's keep looking at this -338**
18 **declaration. Do you still have it up?**
19 A I do.
20 **Q So we just looked at the -338 declaration,**
21 **paragraph 2, where you quote a definition of a POSA,**
22 **correct?**
23 A Yes.
24 **Q And in paragraph 2 of your -338 declaration, you**
25 **say that a POSA would be someone that would have had at**

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1 **least a bachelor's degree in computer science,**
2 **electrical engineering, computer engineering, or an**
3 **equivalent technical degree; and two or more years of**
4 **experience with system-on-chip, interconnect, or**
5 **networking technologies, correct?**
6 A Yes.
7 **Q So based on this definition, a POSA could be**
8 **someone with a bachelor's degree in computer science and**
9 **two years of experience with system-on-chip,**
10 **interconnect, or networking technologies, correct?**
11 A That's what Item 2 says, yes.
12 **Q So a POSA could have a computer science**
13 **bachelor's degree and two years of experience in**
14 **networking technologies and no experience with**
15 **system-on-chip and interconnects, correct?**
16 A It says that -- "two or more years of experience
17 with system-on-chip, interconnect, or networking
18 technologies." So it's a basket of terms:
19 system-on-chip, interconnect, or networking
20 technologies.
21 **Q Right. Okay. So as you read it, there is an**
22 **"or." So according to the POSA definition in**
23 **paragraph 2 of your -338 declaration, a POSA could be**
24 **someone with a bachelor's degree in computer science and**
25 **two years of experience in networking technologies and**

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1 **no experience with system-on-chip and interconnect,**
2 **correct?**
3 MR. KOHLHEPP: Object to form.
4 THE WITNESS: With regard to this IPR, I think
5 the POSA would need some connection to system-on-chip.
6 BY MR. HOLT:
7 **Q So it's your opinion that a POSA for this IPR**
8 **would need some experience with system-on-chip; is that**
9 **right?**
10 MR. KOHLHEPP: Object to form. Scope.
11 THE WITNESS: So, again, the POSA would need to
12 have two or more years of experience with
13 system-on-chip, interconnect, or networking
14 technologies. So it's a basket of terms. And so --
15 that's what they would need to have.
16 BY MR. HOLT:
17 **Q So if someone had two years of experience with**
18 **networking technologies, that would satisfy this**
19 **requirement of two years of experience with**
20 **system-on-chip, interconnect, or networking**
21 **technologies, correct?**
22 MR. KOHLHEPP: Object to form.
23 THE WITNESS: Again, the statement of "two or
24 more years of experience with system-on-chip,
25 interconnect, or networking technologies" is a basket of

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1 terms. And so I would think that the POSA would need to
2 have some knowledge of these three interconnected terms.
3 BY MR. HOLT:
4 **Q What do you mean by "basket of terms"?**
5 A So as it reads here, "experience with
6 system-on-chip, interconnect, or networking
7 technologies."
8 **Q So the "or" means it could be any of those three**
9 **items in that list. Would you agree with that?**
10 MR. KOHLHEPP: Object to form.
11 THE WITNESS: I think we're parsing the exact
12 language here.
13 With regard to this IPR, the POSA would need some
14 knowledge of system-on-chip and interconnect or
15 networking technologies.
16 BY MR. HOLT:
17 **Q So it's your testimony that a POSA would need**
18 **experience with system-on-chip, interconnect, and**
19 **networking technologies?**
20 MR. KOHLHEPP: Object to form.
21 BY MR. HOLT:
22 **Q Is that right?**
23 A It says "or networking technologies."
24 **Q I'm just trying to understand your testimony**
25 **here.**

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1 **So an individual -- an individual with -- with**
2 **two years of experience with networking technologies and**
3 **no experience with system-on-chip or interconnect, would**
4 **they meet the definition of a POSA in paragraph 2 of**
5 **your -338 declaration?**
6 MR. KOHLHEPP: Object to form. Scope.
7 THE WITNESS: Again, in my opinion I think the
8 term "system-on-chip, interconnect, or networking
9 technologies" need to be taken together to understand
10 the scope of knowledge that one would need to meet that
11 POSA.
12 BY MR. HOLT:
13 **Q So would an individual need experience with all**
14 **three of those things, system-on-chip, interconnect, and**
15 **networking technologies?**
16 MR. KOHLHEPP: Object to form.
17 THE WITNESS: Again, I think, depending on the
18 individual, there'd be some -- if you draw a Venn
19 diagram, probably there should be some intersection
20 between at least two of these, I think, with
21 system-on-chip.
22 BY MR. HOLT:
23 **Q Looking at the POSA definition as it's written in**
24 **paragraph 2 of your -338 declaration, though, it says**
25 **that a POSA must have a bachelor's degree in certain**

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1 **degrees and two or more years of experience with, and**
2 **then it lists system-on-chip, interconnect, and**
3 **networking technologies, and uses the word "or" between**
4 **them, such that a person would satisfy the definition if**
5 **they had two years of experience with system-on-chip or**
6 **interconnect or network technologies, correct?**
7 MR. KOHLHEPP: Object to form.
8 THE WITNESS: Again, we're parsing this in
9 different ways.
10 But the crux of the matter is that the individual
11 should have knowledge of system-on-chip and some
12 knowledge of interconnect or networking technologies.
13 BY MR. HOLT:
14 **Q Okay. So the way you're -- the way you**
15 **understand it, then, is that the "POSA" definition in**
16 **paragraph 2 of your -338 declaration requires two years**
17 **of experience including system-on-chip and interconnect**
18 **or networking technologies, but system-on-chip**
19 **experience is required, correct?**
20 MR. KOHLHEPP: Object to form.
21 THE WITNESS: I think the topic that we are
22 looking at covers system-on-chip, so certainly
23 system-on-chip is important.
24 BY MR. HOLT:
25 **Q Okay. The issue I'm trying to understand is not**

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1 whether system-on-chip is important. It's whether
2 you're reading it as a requirement for the "POSA"
3 definition in paragraph 2 of your -338 declaration.
4 So I ask again: If an individual with a computer
5 science bachelor's degree had two years of experience in
6 interconnect and networking technologies, but not
7 system-on-chip, would they qualify as a POSA under this
8 definition?
9 MR. KOHLHEPP: Object to form.
10 THE WITNESS: Again, in my opinion, I think there
11 should be some system-on-chip and some element of
12 interconnect or networking technologies.
13 BY MR. HOLT:
14 Q So my understanding, then, is your answer is that
15 a person with a computer science bachelor's degree and
16 two years of experience in interconnect and networking
17 technologies but not in system-on-chip would not qualify
18 as a POSA; is that correct?
19 MR. KOHLHEPP: Object to form.
20 THE WITNESS: Interconnect is a broad term. If
21 the interconnect was in the context of system-on-chip,
22 then, yes.
23 BY MR. HOLT:
24 Q Dr. Dutt, do you understand the term "or" to mean
25 one or the other?

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1 MR. KOHLHEPP: Object to form.
2 THE WITNESS: Uh-huh.
3 BY MR. HOLT:
4 Q Do you see that there's an Oxford comma following
5 the word "interconnect" in the POSA definition?
6 MR. KOHLHEPP: Object to form.
7 THE WITNESS: Yeah.
8 BY MR. HOLT:
9 Q So would you agree or disagree on -- strike that.
10 If an individual had a bachelor's degree in
11 computer science and two years of experience in
12 networking technologies but not system-on-chip or
13 interconnect, do you agree or disagree that that person
14 would qualify as a POSA under the definition in
15 paragraph 2 of your -338 declaration?
16 MR. KOHLHEPP: Object to form. Scope.
17 THE WITNESS: Again, you know, I -- I think these
18 terms -- you know, the system-on-chip, interconnect, or
19 networking technologies need to be looked at together.
20 I realize there's an "or" there. But it's this basket
21 that we're looking at in the context of this declaration
22 that I have.
23 BY MR. HOLT:
24 Q So do you agree or disagree with my statement?
25 A Could you repeat the statement again?

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1 Q Yes. If an individual had a bachelor's degree in
2 computer science and two years of experience in
3 networking technologies but no experience with
4 system-on-chip or interconnect, would you agree or
5 disagree that that person would qualify as a POSA under
6 the definition in paragraph 2 of your -338 declaration?
7 MR. KOHLHEPP: Object to form. Scope.
8 THE WITNESS: I'd have to look at that person's
9 CV to understand, you know, what -- whether the person
10 would actually qualify again. Because -- relating to
11 this particular declaration of conferences in the area
12 of embedded systems, computer design -- chip design, the
13 person may or may not. It depends on what kind of
14 experience the person has. And it would require me to
15 look more carefully at that instance of that individual.
16 BY MR. HOLT:
17 Q So what would you look for in the person's CV?
18 MR. KOHLHEPP: Object to form. Scope.
19 THE WITNESS: Probably see what kind of
20 experience they've had.
21 BY MR. HOLT:
22 Q And if their CV showed that they had two years of
23 experience with networking technologies but no
24 experience with system-on-chip or interconnect, would
25 they, then, qualify as a POSA under the definition in

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1 paragraph 2 of your -338 declaration or not?
2 MR. KOHLHEPP: Object to form. Scope.
3 THE WITNESS: Again, I'd have to look at that
4 individual's degree and profile and see whether they
5 would meet that definition of a POSA.
6 BY MR. HOLT:
7 Q Assuming they had a bachelor's degree in computer
8 science, would the individual with two years of
9 experience in networking technologies but no experience
10 in system-on-chip and interconnect meet the definition
11 of a POSA in paragraph 2 of your -338 declaration?
12 MR. KOHLHEPP: Object to form. Scope.
13 THE WITNESS: Again, I'd to have to look at that
14 individual's CV to see what kind of experience in
15 networking technologies the individual had to see if the
16 person would qualify as a POSA.
17 BY MR. HOLT:
18 Q So just having two years of experience in
19 networking technologies alone may not qualify an
20 individual to meet the definition of a POSA in
21 paragraph 2 of your -338 declaration? Is that your
22 testimony?
23 MR. KOHLHEPP: Object to form. Scope.
24 THE WITNESS: It may or may not, yeah.
25 //

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1 BY MR. HOLT:
2 **Q Let's go to, well -- Dr. Dutt, you yourself have**
3 **experience with network-on-chip or NoCs, correct?**
4 A Yes.
5 **Q Okay. Yeah. Please make sure your responses are**
6 **verbal for the court reporter.**
7 A Sorry. Yes.
8 **Q Okay.**
9 A Sorry.
10 **Q Let's go to your -338 declaration at**
11 **paragraph 21. In the last sentence of paragraph 21, you**
12 **refer to a session titled "Hot Topic - Network on a**
13 **Chip," correct?**
14 A Yes.
15 **Q And you've mentioned several times today about**
16 **networks-on-chips being a hot topic at the DATE 2002**
17 **conference. Do you recall that?**
18 A Yes.
19 **Q Is it fair to say that network-on-chip, or NoC,**
20 **was a hot new topic in 2002?**
21 MR. KOHLHEPP: Object to form.
22 THE WITNESS: The conference DATE 2002 had this
23 session "Hot Topic - Network on Chip." So from that
24 conference perspective, that was a hot topic for that
25 event.

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1 Now, if the question is -- as a broader topic, is
2 it a hot topic? That's debatable. It depends on the
3 perspective of who's doing research, what's important or
4 not.
5 BY MR. HOLT:
6 **Q Okay. So you're saying from the perspective of**
7 **the 2002 DATE conference, network-on-chip, or NoC, was a**
8 **hot new topic at that time?**
9 MR. KOHLHEPP: Object to form.
10 Mischaracterization of the testimony. You keep
11 inserting "new." He -- he didn't say that.
12 Please keep your questions accurate.
13 MR. HOLT: No speaking objections or leading the
14 witness, please.
15 THE WITNESS: Could you repeat the question
16 again?
17 BY MR. HOLT:
18 **Q Yeah. So the question was: You agree, from the**
19 **perspective of the DATE 2002 conference, that**
20 **networks-on-chip, or NoC, was a hot topic at the time?**
21 A I -- I wouldn't say that. I agree that there was
22 a session titled "Hot Topic - Network on Chip," as I
23 indicate in Item 21 of my declaration for the DATE 2002
24 conference.
25 **Q You testified a few moments ago saying "so from**

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1 **the conference perspective, that was a hot topic for**
2 **that event."**
3 A That is correct. That is accurate. From the
4 conference perspective, that was a hot topic, and they
5 had a session titled "Hot Topic - Network on Chip," yes.
6 And --
7 **Q So, again, my question was: Do you agree, from**
8 **the perspective of the DATE 2002 conference, that**
9 **networks-on-chip, or NoC, was a hot topic at the time?**
10 A I agree that the conference had a session titled
11 "Hot Topic - Network on Chip."
12 **Q You were teaching computer science in 2002,**
13 **correct?**
14 A Yes.
15 **Q Do you recall if network-on-chip would have been**
16 **covered in the computer science courses for a bachelor's**
17 **degree in 2002?**
18 MR. KOHLHEPP: Object to form. Scope.
19 THE WITNESS: You know, I'm not prepared to talk
20 about things that I haven't researched. I'd have to go
21 back and look. I -- I don't remember. It's -- it's
22 20-plus years back. So in terms of what courses were
23 offered, what curriculum, I have not done the research
24 on that, so I'm afraid I don't have an answer to that.
25 //

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1 BY MR. HOLT:
2 **Q Do you recall if there were any commercially**
3 **available NoCs in 2002?**
4 MR. KOHLHEPP: Object to form. Scope.
5 THE WITNESS: Again, I -- I haven't researched
6 that, and I -- I, you know, I'd have to go back and
7 look. I -- I -- you know, I don't remember.
8 BY MR. HOLT:
9 **Q Did you have experience with NoCs in 2002?**
10 A Yes. We published several papers on that topic
11 in that era.
12 **Q Had you designed any NoCs as of 2002?**
13 A Again, I'd have to go back and look at my, you
14 know, design portfolio and -- and review -- review my
15 portfolio to see what I had done at what time. So I
16 can't answer definitively in this deposition, under
17 oath, because I -- I -- I can't recall. But I -- I have
18 done NoC-based designs, but I -- you know, the specific
19 question is, did you do it in 2002? I -- I don't -- I'd
20 have to go back and research that.
21 **Q Let's go to your second -343 declaration. It's**
22 **Exhibit 1038 in the -343 IPR.**
23 A Okay.
24 **Q All right. If you go to paragraph 1, you state**
25 **that you understand the matter of the IPR of -- excuse**

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1 me.
2 You say that:
3 "I make this Declaration in
4 conjunction with the Reply Brief I
5 understand is being submitted by the
6 Petitioner, Qualcomm, in the matter of
7 the Inter Partes Review of U.S. patent
8 No. 7,594,052 ('the '052 patent')."
9 Do you see that?
10 A Yes.
11 Q Have you reviewed the '052 patent mentioned in
12 paragraph 1 of your second -343 declaration?
13 A No. I mean, I -- I may have seen it in the past,
14 but I -- I did not look at it in detail.
15 Q Have you reviewed the petition in the -343 IPR?
16 A I'm not familiar with the petition. Are you
17 talking about the petition from Qualcomm?
18 Q Correct.
19 A In that sentence? No, I have not seen that.
20 Q Have you spoken with Petitioner Qualcomm's
21 technical expert, Dr. Hassoun, for the -343 IPR?
22 A I'm sorry. That name does not ring a bell. I
23 don't know who that is. I'm sorry.
24 Q Okay. Have you reviewed any portion of
25 Patent Owner's response in the -343 IPR?

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1 A No, I'm not familiar with that either. No.
2 Q Have you been made aware of any arguments against
3 the public availability of Radulescu 2004 in
4 the -343 IPR?
5 MR. KOHLHEPP: Object to form.
6 THE WITNESS: I'm sorry. Can you repeat the
7 question? I didn't understand the question.
8 BY MR. HOLT:
9 Q Yeah. Have you been made aware of any of the
10 arguments in Patent Owner's response regarding the
11 public availability of Radulescu 2004 in the -343 IPR?
12 A I'm not familiar with that.
13 MR. KOHLHEPP: Object to form.
14 Go ahead.
15 BY MR. HOLT:
16 Q If we go to your -338 declaration.
17 A Uh-huh.
18 Q In your -338 declaration and -- this is for
19 the -338 IPR, correct?
20 A Uh-huh.
21 Q Do you understand that the -338 IPR concerns the
22 '449 patent?
23 A I'm not familiar with -- what patent, again?
24 Q Are you aware of the '449 patent?
25 A I'm not sure I know what that is, no.

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1 Q Okay. Have you reviewed the petition in the -338
2 IPR?
3 A No.
4 Q Have you spoken with Petitioner's technical
5 expert, Dr. Mowry, in the -338 IPR?
6 A I'm not familiar with that name. No, I don't. I
7 have not spoken to that person. I'm sorry.
8 Q Let's go back to your second -343 declaration.
9 Looking at paragraph 11.
10 A Uh-huh.
11 Q So in paragraph 11 in the second-to-last
12 sentence, starting with "Based on my recollection," you
13 state:
14 "Based on my recollection, and as also
15 confirmed to me by a librarian at the
16 University of California-Irvine (who I
17 would ordinarily rely on), my university
18 (the University of California-Irvine)
19 has had access to IEEE Xplore since
20 sometime in the year 2000."
21 Do you see that?
22 A Yes.
23 Q Who was the librarian referenced here in
24 paragraph 11 of your second -343 declaration?
25 A Sure. Her name's Ms. Julia Gelfand,

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1 G-e-l-f-a-n-d. She's the science and technology
2 librarian at the University of California, Irvine.
3 Again, her name is Julia, J-u-l-i-a, Gelfand,
4 G-e-l-f-a-n-d. She's the liaison librarian for the
5 schools of computer science, computer engineering, and
6 physical sciences, I believe.
7 Q How long has she held that role at UC Irvine?
8 A You know, I probably don't know how long, but
9 I've known her almost as long as I've been at UCI, so I
10 would think several decades.
11 Q Do you know how long she has been a librarian at
12 UC Irvine?
13 A Again, I don't have definitive knowledge of how
14 long she's been at UC Irvine as a librarian. As I
15 mentioned, I've known her as a librarian almost since
16 the time I was an assistant professor. So I would say
17 easily 20-plus years. But I don't have definitive
18 knowledge of her employment history.
19 Q So --
20 A I'd just add, again, I have interacted with her
21 since the early 2000s easily.
22 Q Here you say, in paragraph 11, that she confirmed
23 to you that UC Irvine has had access to IEEE Xplore
24 since sometime in the year 2000. So --
25 A Yes.

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1 **Q -- how did she confirm that to you?**
2 A I asked her to determine when UCI libraries got
3 access to IEEE Xplore. And so she did her research and
4 got back to me with this information.
5 **Q And what information did she provide?**
6 A I'd have to look at the exact email, but the gist
7 of the information was that UCI and several of the
8 UC campuses had licenses for IEEE Xplore in the year
9 2000 -- starting in the year 2000.
10 **Q Did the librarian indicate that these were**
11 **limited licenses?**
12 MR. KOHLHEPP: Object to form.
13 THE WITNESS: I'm sorry. Can you clarify what
14 you mean by "limited licenses"?
15 BY MR. HOLT:
16 **Q Are you aware that licenses to online search**
17 **services may be restricted as to who can access the**
18 **online services?**
19 A I see. So to answer your question, I don't know.
20 But I can say definitely that I and members of my lab
21 have often accessed IEEE resources ever since I've been
22 at UCI. And -- and the license was available.
23 I know for -- now, for example, currently, anyone
24 who logs in to a UCI network has access to the
25 IEEE Xplore library. So the license covers any -- any

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1 anyone affiliated with UCI.
2 **Q You're saying that the license covers anyone**
3 **currently at this time, correct?**
4 A I can state that, yes, right now -- as of now,
5 and probably was the case then as well, but I do not
6 have definitive recollection of what that license meant.
7 But I can state for sure that my team and I have often
8 accessed IEEE Xplore through the UCI libraries for our
9 research purposes.
10 **Q Did this librarian explain what she did to**
11 **investigate your inquiry as to the availability of**
12 **IEEE Xplore at UC Irvine in the 2000s?**
13 A I'd have to go back and -- and look at the email
14 messages that I had with her. But if my memory serves
15 me right, she was trying to determine the date that the
16 UC system and UCI signed a license agreement with IEEE
17 for the Xplore. And that date was sometime in 2000.
18 **Q When you say that you ordinarily -- that --**
19 **excuse me.**
20 **In paragraph 11 of your second -343 declaration,**
21 **you say that "the librarian is someone who I would**
22 **ordinarily rely on."**
23 **Are there instances when you did not rely on this**
24 **librarian or would not rely on this librarian?**
25 MR. KOHLHEPP: Object to form.

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1 THE WITNESS: No. Sorry. I -- I mean -- I think
2 that was phrasing that just says that I typically would
3 access -- ask her for information. So if I asked her a
4 question, I would rely on her, because she's the expert
5 librarian.
6 BY MR. HOLT:
7 **Q Did you write this portion of your second -343**
8 **declaration?**
9 A The exact wording, I don't know. But certainly
10 the substance of what's there is something that I had
11 provided and worked with counsel to have the declaration
12 reformatted and positioned to be consistent with legal
13 terms. But the content comes from me.
14 **Q If you go down to paragraph 16 of your**
15 **second -343 declaration.**
16 A Uh-huh.
17 **Q In paragraph 16, in the third sentence -- it**
18 **starts with "If a POSA." Do you see that?**
19 A Yes.
20 **Q So in this paragraph 16 of your second -343**
21 **declaration, starting in the third sentence it says:**
22 **"If a POSA had not personally attended**
23 **the DATE 2004 conference in Paris,**
24 **France, he or she would have likely**
25 **reviewed the proceedings from that**

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1 **conference as soon as they were**
2 **electronically available from**
3 **IEEE Xplore."**
4 **Do you see that?**
5 A Yes.
6 **Q Did you write this portion of your declaration?**
7 A Again, I don't know if that is the exact wording,
8 but this is exactly what I had provided and worked with
9 counsel to have in this item here. This, as well as the
10 next sentence, because, indeed, as I mentioned earlier
11 in my declaration -- I mean, in -- in this discussion
12 here, my lab typically would review all of the papers in
13 the major conferences in our area after the conference
14 is over. So, for example, if DATE 2002 had just gotten
15 over, regardless of who attended or not, we would review
16 all of the papers to see what's interesting as
17 researchers in that area. And this is common practice
18 for many other research colleagues in -- in this
19 community.
20 MR. HOLT: I think we've been going for about an
21 hour. Let's go off the record and take a break.
22 THE STENOGRAPHIC REPORTER: Okay.
23 (Recess.)
24 MR. HOLT: We'll go back on the record.
25 //

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1 BY MR. HOLT:
2 **Q The Patent Owner has no further questions. Thank**
3 **you for your time today, Dr. Dutt.**
4 A Thank you.
5 MR. KOHLHEPP: Let's just go off the record.
6 We'll take another short break, probably about
7 10 minutes, then we can hop back on.
8 THE STENOGRAPHIC REPORTER: Mr. Holt, is that
9 okay?
10 MR. HOLT: Yeah. That's good.
11 (Recess.)
12
13 EXAMINATION
14 BY MR. KOHLHEPP:
15 **Q Okay. Dr. Dutt, just a couple of questions.**
16 **Earlier you were asked some questions about looking at**
17 **your diary in connection with DATE conferences. Do you**
18 **recall that?**
19 A Yes.
20 **Q So when putting together your declaration in**
21 **the -338 matter, Exhibit 1044 -- that's about the**
22 **DATE 2002 conference. Do you recall that exhibit?**
23 A Yes.
24 **Q Okay. When putting together Exhibit 1044, did**
25 **you have an independent personal recollection of**

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1 **attending the DATE 2002 conference without looking at**
2 **your diary?**
3 A Yes, I --
4 (Speaking simultaneously.)
5 MR. HOLT: Objection. Form.
6 THE WITNESS: Yes. I moderated a session at that
7 conference and I presented papers; so -- yeah.
8 BY MR. KOHLHEPP:
9 **Q Okay. And then when putting together your**
10 **declarations in the 1038 matter -- I'm sorry, the -343**
11 **matter concerning the '052 patent -- you recall there**
12 **were two declarations in that matter, correct?**
13 A Yes.
14 **Q Okay. When putting together those declarations,**
15 **did you have an independent personal recollection of**
16 **attending the DATE 2004 conference without looking at**
17 **your diary?**
18 MR. HOLT: Objection. Form.
19 THE WITNESS: Yes. Again, I presented papers at
20 the conference. I personally presented papers at that
21 conference.
22 BY MR. KOHLHEPP:
23 **Q Okay. So why did you look at your diary?**
24 A That was to determine how many days I made for
25 that trip. Because the conference runs for three to

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1 four days, so I was trying to determine which -- which
2 days particularly I was there.
3 MR. KOHLHEPP: Okay. No further questions.
4 THE STENOGRAPHIC REPORTER: Are we done?
5 MR. HOLT: I'm sorry.
6
7 EXAMINATION
8 BY MR. HOLT:
9 **Q Just one more question.**
10 **Dr. Dutt, did you meet with your counsel to**
11 **discuss the content of your redirect testimony, before**
12 **redirect?**
13 A We did have a conversation before -- during this
14 break.
15 **Q And what did you discuss during that**
16 **conversation?**
17 A Generally the items that I discussed on the
18 record regarding the -- the diary.
19 MR. HOLT: Let's take a quick five-minute break.
20 THE STENOGRAPHIC REPORTER: Okay.
21 (Recess.)
22 MR. HOLT: Back on the record.
23 BY MR. HOLT:
24 **Q Dr. Dutt, a moment ago you said that you did**
25 **confer with counsel during the break before your**

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1 **counsel's redirect questioning; is that correct?**
2 A That's correct.
3 **Q Okay. And what was your discussion with counsel**
4 **during the break before redirect?**
5 A It was generally in the topic that I have on
6 record.
7 **Q So what did counsel say to you during the break**
8 **before redirect?**
9 A I don't recall exactly, but that there'll be some
10 questions on the DATE 2002, DATE 2004 travel.
11 **Q Did counsel say anything else to you during the**
12 **break when you conferred before redirect?**
13 A No.
14 **Q Okay. Thanks again for your time, Dr. Dutt.**
15 **No further questions from Patent Owner.**
16 MR. KOHLHEPP: We'll reserve the right to read
17 and sign.
18 THE STENOGRAPHIC REPORTER: Do you need a copy,
19 Mr. Kohlhepp?
20 MR. KOHLHEPP: Yes. I think normal delivery is
21 fine, but I'll follow up with you on that.
22 THE STENOGRAPHIC REPORTER: Okay. Let me know.
23 //
24 //
25

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I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken remotely before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were duly sworn; that a stenographic record of the proceedings was made by me using machine shorthand, which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given by the witness.

I further certify I am neither financially interested in the action nor a relative or employee of any attorney or any party to this action.

Further, that if the foregoing pertains to the original transcript of a deposition in a federal case, before completion of the proceedings, review of the transcript [X] was [ ] was not requested.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: 2/27/2025 Cheryl R. Kamalski

CHERYL R. KAMALSKI
Certified Shorthand Reporter No. 7113

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DECLARATION UNDER PENALTY OF PERJURY

Case Name: Qualcomm
vs. Network System Technologies
Date of Deposition: 02/25/2025
Job No.: 10158459

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

Executed this _____ day of _____, 2025, at _____.

_____
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)

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DEPOSITION ERRATA SHEET
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vs. Network System Technologies
Name of Witness: Nikil Dutt, Ph.D.
Date of Deposition: 02/25/2025
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