

Deposition of
Nikil Dutt, Ph.D.
February 25, 2025
Volume I

Qualcomm
vs.
Network System Technologies



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Page 1 1 UNITED STATES PATENT AND TRADEMARK OFFICE 2 BEFORE THE PATENT TRIAL AND APPEAL BOARD 3 4 QUALCOMM INCORPORATED, 5 Petitioner, IPR NO. 2024-00338 6 vs. U.S. PATENT NO. 7,373,449 7 NETWORK SYSTEM TECHNOLOGIES, U.S. PATENT 8 LLC, NO. 7,594,052 9 Patent Owner. 10 11 12 13 14 15 REMOTE DEPOSITION OF NIKIL DUTT, PH.D. 16 Tuesday, February 25, 2025 17 Volume I 18 19 20 21 22 23 Reported by: 24 CHERYL R. KAMALSKI 25 Certified Shorthand Reporter No. 7113 Job No. 10158459	Page 3 1 APPEARANCES: 2 3 For Petitioner: 4 CARLSON CASPERS VANDENBURGH & LINDQUIST, P.A. 5 BY: PETER M. KOHLHEPP, ESQ. 6 225 South Sixth Street, Suite 4200 7 Minneapolis, Minnesota 55402 8 (612) 436-9600 9 pkohlhepp@carlsoncaspers.com 10 11 For Patent Owner: 12 13 NIXON PEABODY LLP 14 BY: BENJAMIN HOLT, ESQ. 15 799 9th Street NW, Suite 500 16 Washington, D.C. 20001 17 (202) 585-8048 18 bholt@nixonpeabody.com 19 NIXON PEABODY LLP 20 BY: ANGELO CHRISTOPHER, ESQ. 21 70 West Madison Street 22 Chicago, Illinois 60602 23 (312) 977-4473 24 achristopher@nixonpeabody.com 25 Also Present: CHRIS LANDRUM, Aptus Zoom Monitor MARILYN ORTIZ, Aptus Zoom Monitor
Page 2 1 UNITED STATES PATENT AND TRADEMARK OFFICE 2 BEFORE THE PATENT TRIAL AND APPEAL BOARD 3 4 QUALCOMM INCORPORATED, 5 Petitioner, No. 2024-00338 6 vs. U.S. PATENT NO. 7,373,449 7 NETWORK SYSTEM TECHNOLOGIES, U.S. PATENT 8 LLC, NO. 7,594,052 9 Patent Owner. 10 11 12 13 14 Remote Deposition of NIKIL DUTT, PH.D., Volume I, 15 taken on behalf of Patent Owner, with everyone appearing 16 at their remote addresses, beginning at 8:57 a.m. and 17 ending at 3:42 p.m., on Tuesday, February 25, 2025, 18 before Cheryl R. Kamalski, Certified Shorthand Reporter 19 No. 7113. 20 21 22 23 24 25	Page 4 1 INDEX 2 WITNESS EXAMINATION 3 NIKIL DUTT, PH.D. 4 Volume I 5 BY MR. HOLT 5, 159 6 BY MR. KOHLHEPP 157 7 8 9 EXHIBITS 10 (None) 11 12 13 PREVIOUSLY MARKED EXHIBITS 14 NUMBER PAGE 15 Exhibit 1005 78 16 Exhibit 1012 9 17 Exhibit 1018 63 18 Exhibit 1019 48 19 Exhibit 1025 116 20 Exhibit 1026 118 21 Exhibit 1038 10 22 Exhibit 1039 55 23 Exhibit 1044 9 24 Exhibit 1045 125 25 Exhibit 2061 73 Exhibit 2067 11 Exhibit 2068 111 Exhibit 2069 128

Page 5 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 --	Page 7 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
Page 6 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,	Page 8 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.

Page 9 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	Page 11 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
Page 10 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.	Page 12 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

Page 13 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	Page 15 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?
Page 14 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	Page 16 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?

Page 17 1 A That's correct. 2 Q Was it over a month after your deposition? 3 A I'd have to go back and look at my calendar. 4 I -- I don't -- I don't remember the exact dates. 5 Q In preparing your second -343 declaration, were 6 you made aware of Patent Owner's arguments related to 7 your first -343 declaration? 8 MR. KOHLHEPP: Object to form. 9 THE WITNESS: Can you repeat the question? I 10 don't understand the question. 11 BY MR. HOLT: 12 Q You submitted two declarations in the -- you have 13 now submitted two declarations in the -343 IPR, correct? 14 A Yes. 15 Q In preparing the second -343 declaration, were 16 you made aware of any arguments against your first -343 17 declaration? 18 MR. KOHLHEPP: Object to form. 19 THE WITNESS: I don't recall. 20 BY MR. HOLT: 21 Q We previously discussed your preparation of 22 the -338 declaration. Would your responses regarding 23 preparation of the -338 declaration also be applicable 24 to your preparation of the second -343 declaration? 25 MR. KOHLHEPP: Object to form.	Page 19 1 A Is that Exhibit 1012? 2 Q Correct. 3 A Yes. 4 Q Do you recall this first -343 declaration? 5 A Yes. 6 Q Your first -343 declaration addressed the 7 availability of Radulescu 2004 at the DATE 2004 8 conference, correct? I can direct you, for example, to 9 paragraphs 21 and 22 of your first -343 declaration. 10 A Yes. I just got there. Yes. 11 Q So your first -343 declaration addressed the 12 availability of Radulescu 2004 at the DATE 2004 13 conference, correct? 14 A That's correct. 15 Q Your first -343 declaration does not mention a 16 person of ordinary skill in the art, or POSA, correct? 17 A Yeah. Yes. 18 Q And your first -343 declaration does not mention 19 IEEE Xplore, correct? 20 A I don't see IEEE Xplore listed. But all 21 conference publications are published in IEEE Xplore -- 22 IEEE conferences. So that's, kind of, implicit. And 23 that's the way in which we access the papers after the 24 conference. 25 Q The words "IEEE Xplore" are not expressly
Page 18 1 THE WITNESS: I'm sorry. I didn't understand the 2 question. Can you repeat that question again? 3 BY MR. HOLT: 4 Q So a few moments ago, we were discussing your 5 preparation of the -338 declaration, such as how long 6 you spent preparing it and things that you reviewed. 7 Are those -- would your responses to those questions 8 also be applicable with respect to your preparation of 9 the second -343 declaration? 10 MR. KOHLHEPP: Object to form. 11 THE WITNESS: Could you specify exactly what 12 responses you're referring to? That's a very broad 13 statement and so... 14 BY MR. HOLT: 15 Q Sure. So how long did you spend preparing your 16 second -343 declaration? 17 A I'd have to look at my diary, but several hours, 18 I would say. To prepare that, it -- it took several 19 hours and -- yeah. 20 Q Aside from your attorneys, did you discuss the 21 content of your second -343 declaration with anyone else 22 as you prepared it? 23 A No. 24 Q Dr. Dutt, let's look at your first -343 25 declaration.	Page 20 1 mentioned in this first -343 declaration, correct? 2 A I don't see it listed in the first declaration. 3 But as I mentioned, again, you know, it's the only way 4 in which we can access the conference proceedings after 5 the event. 6 So if -- if any POSA who works in the area needs 7 to access a paper, they would have to go to 8 IEEE Xplore -- or anyone, in general. 9 Q As you testified a few moments ago, your 10 first -343 declaration does not mention a POSA, correct? 11 MR. KOHLHEPP: Object to form. 12 THE WITNESS: Yeah. But, you know, I -- I know 13 all that material, so I -- as an expert, I -- you know, 14 I have knowledge of what appeared at the conference, of 15 the papers that appeared at the conference, of the fact 16 that I was given a copy of the proceedings, and that the 17 proceedings appeared in IEEE Xplore. 18 BY MR. HOLT: 19 Q Your first -343 declaration does not mention 20 "OCP," correct? 21 A That's correct. 22 Q Let's go to your second -343 declaration. 23 A Okay. 24 Q Your second -343 declaration, like your 25 first -343 declaration, again addresses whether

Page 21 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.	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.
Page 22 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 24 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,

Page 25 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	Page 27 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
Page 26 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	Page 28 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

Page 29 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	Page 31 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.
Page 30 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	Page 32 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 //

Page 33 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	Page 35 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.
Page 34 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 //	Page 36 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?

Page 37 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	Page 39 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
Page 38 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.	Page 40 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

Page 41 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	Page 43 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
Page 42 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.	Page 44 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,

Page 45 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	Page 47 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
Page 46 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	Page 48 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

Page 49 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.	Page 51 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.
Page 50 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.	Page 52 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

Page 53 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	Page 55 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
Page 54 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.	Page 56 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

Page 57 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.	Page 59 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.
Page 58 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	Page 60 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

Page 61 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.	Page 63 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
Page 62 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?	Page 64 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

Page 65 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	Page 67 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
Page 66 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	Page 68 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

Page 69 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.	Page 71 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
Page 70 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?	Page 72 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

Page 73 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.	Page 75 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,
Page 74 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	Page 76 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

Page 77 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.	Page 79 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
Page 78 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	Page 80 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

Page 81 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.	Page 83 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
Page 82 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.	Page 84 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

Page 85 1 first declaration. And in the first declaration, I 2 stated very clearly that I had attended the conference 3 in 2004 and I received a copy of the proceedings. 4 Q My question was more specific. My question is: 5 Your second -343 declaration does not include a 6 statement stating that you personally attended the 7 presentation of Radulescu 2004 at the DATE conference, 8 correct? That statement is not included in your 9 second -343 declaration? 10 A I attended the presentation of the Radulescu, 11 right? Yeah, I -- I -- it does not state that. 12 Q Your second -343 declaration does not state that 13 you personally saw Radulescu 2004 within the DATE 2004 14 conference proceedings, correct? 15 MR. KOHLHEPP: Object to form. 16 THE WITNESS: Well, there's -- I don't know how 17 many papers there are in DATE 2004. But it's a fact 18 that when we receive the copy of the proceedings, it has 19 all of the papers that were accepted in that conference. 20 And this is standard practice in IEEE. I've been a 21 chair of many conferences; so -- it has -- it's got to 22 have been in that particular proceedings that was handed 23 to me. 24 Did I look at it at that time? I don't remember. 25 Maybe I did. Maybe I didn't. But it was definitely in	Page 87 1 Q And your first deposition also discussed the 2 DATE 2004 conference, right? 3 A That's correct. 4 Q Is it fair to say that the 2002 and 2004 DATE 5 conferences are similar? 6 A They're -- yes, they're similar in the sense 7 there's -- they're a continuation of the same conference 8 series that's held annually. So the topical coverage 9 broadly is similar. It may change a little bit every 10 year based on emerging new technologies and so forth. 11 But, yeah, they're somewhat similar. 12 Q Specifically the procedures of the 2002 and 2004 13 DATE conferences -- would you agree that the procedures 14 of those two conferences are similar? 15 A Can you clarify what you mean by "procedures" of 16 the conference? 17 Q Yeah. So, for example, the paper submission 18 process would be similar for both the 2002 and 2004 DATE 19 conferences, correct? 20 A They should be similar, yes. 21 Q And also would you agree that the paper 22 distribution process would be similar for the 2002 and 23 2004 DATE conferences? 24 A When you say "paper distribution," you mean to 25 attendees or to --
Page 86 1 the proceedings that was handed out to me. 2 BY MR. HOLT: 3 Q So just to clarify, my question is not whether or 4 not Radulescu was included in the proceedings. My 5 question is about what statements are or are not within 6 your declaration. 7 I just want to clarify, your second declaration 8 does not include a statement stating that you personally 9 saw Radulescu 2004 within the DATE 2004 conference 10 proceedings, correct? 11 MR. KOHLHEPP: Object to form. 12 THE WITNESS: Yeah. 13 BY MR. HOLT: 14 Q Your second -343 declaration -- strike that. 15 MR. HOLT: Let's go off the record. 16 THE STENOGRAPHIC REPORTER: Okay. 17 (Lunch recess.) 18 MR. HOLT: Let's go back on the record. 19 BY MR. HOLT: 20 Q Dr. Dutt, your -338 declaration discusses the 21 DATE 2002 conference, correct? 22 A That's correct. 23 Q And your declarations in the -343 IPR discussed 24 the DATE 2004 conference, right? 25 A That's correct.	Page 88 1 Q Yes. 2 A Yes, the process is the same where attendees 3 receive a copy of the proceedings at the time of 4 registration that -- and the proceedings contain all of 5 the papers that appear in that particular event. 6 Q And you would also agree that the presentation 7 process for the 2002 and 2004 DATE conferences would be 8 similar as well? 9 MR. KOHLHEPP: Object to form. 10 THE WITNESS: You know, I'd have to go back and 11 look at the exact schedules, because maybe -- over the 12 years, sometimes the papers have shorter presentations, 13 sometimes they have longer presentations, they're in 14 special sessions. So the overall structure of the 15 conference may remain the same, but the individual paper 16 presentation lengths and requirements for presentations, 17 they may vary from year to year. 18 BY MR. HOLT: 19 Q Okay. 20 A I don't remember exactly if they're exactly the 21 same for 2002 and 2004. I'd have to go back and look at 22 the, maybe, table of contents and maybe look at -- or 23 maybe that might not even say about the paper 24 presentation; maybe the schedule. 25 Q Yeah. Besides the actual content of the

Page 89 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?	Page 91 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
Page 90 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	Page 92 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

Page 93 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	Page 95 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 cancellation 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 cancellation on their way to the DATE 2002 conference? 25 A I wouldn't have knowledge of that, frankly. But
Page 94 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 //	Page 96 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**

Page 101 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,	Page 103 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
Page 102 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?	Page 104 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

Page 105 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	Page 107 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
Page 106 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	Page 108 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.

Page 109 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	Page 111 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
Page 110 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	Page 112 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

Page 113 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	Page 115 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
Page 114 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.	Page 116 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 --

Page 117 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	Page 119 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
Page 118 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,	Page 120 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.

Page 121 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	Page 123 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
Page 122 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?	Page 124 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

Page 125 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	Page 127 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
Page 126 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.	Page 128 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

Page 129 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	Page 131 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
Page 130 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?	Page 132 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

Page 133 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.	Page 135 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
Page 134 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	Page 136 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

Page 137 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	Page 139 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
Page 138 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.	Page 140 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

Page 141 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?	Page 143 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
Page 142 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?	Page 144 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 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 //

Page 145 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.	Page 147 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 //
Page 146 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	Page 148 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

Page 149 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?	Page 151 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,
Page 150 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.	Page 152 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.

Page 153 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	Page 155 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
Page 154 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.	Page 156 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 //

Page 157 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	Page 159 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
Page 158 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	Page 160 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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1 I, the undersigned, a Certified Shorthand Reporter
2 of the State of California, do hereby certify:
3 That the foregoing proceedings were taken
4 remotely before me at the time and place herein set
5 forth; that any witnesses in the foregoing proceedings,
6 prior to testifying, were duly sworn; that a
7 stenographic record of the proceedings was made by me
8 using machine shorthand, which was thereafter
9 transcribed under my direction; that the foregoing
10 transcript is a true record of the testimony given by
11 the witness.
12 I further certify I am neither financially
13 interested in the action nor a relative or employee of
14 any attorney or any party to this action.
15 Further, that if the foregoing pertains to the
16 original transcript of a deposition in a federal case,
17 before completion of the proceedings, review of the
18 transcript [X] was [] was not requested.
19 IN WITNESS WHEREOF, I have this date subscribed my
20 name.
21 Dated: 2/27/2025 *Cheryl R. Kamalski*
22
23 CHERYL R. KAMALSKI
24 Certified Shorthand Reporter No. 7113
25

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1 DECLARATION UNDER PENALTY OF PERJURY
2 Case Name: Qualcomm
3 vs. Network System Technologies
4 Date of Deposition: 02/25/2025
5 Job No.: 10158459
6
7 I, NIKIL DUTT, PH.D., hereby certify
8 under penalty of perjury under the laws of the State of
9 _____ that the foregoing is true and correct.
10 Executed this _____ day of
11 _____, 2025, at _____.
12
13 _____
14 NIKIL DUTT, PH.D.
15
16 NOTARIZATION (If Required)
17 State of _____
18 County of _____
19 Subscribed and sworn to (or affirmed) before me on
20 this _____ day of _____, 20____,
21 by _____, proved to me on the
22 basis of satisfactory evidence to be the person
23 who appeared before me.
24 Signature: _____ (Seal)
25

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1 DEPOSITION ERRATA SHEET
Case Name: Qualcomm
2 vs. Network System Technologies
Name of Witness: Nikil Dutt, Ph.D.
3 Date of Deposition: 02/25/2025
Job No.: 10158459
4 Reason Codes: 1. To clarify the record.
2. To conform to the facts.
3. To correct transcription errors.
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1 DEPOSITION ERRATA SHEET
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21 From _____ to _____
22 _____ Subject to the above changes, I certify that the
transcript is true and correct
23 _____ No changes have been made. I certify that the
transcript is true and correct.
24
25 NIKIL DUTT, PH.D.

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