

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

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CISCO SYSTEMS, INC.,

Petitioner,

v.

PORTSMOUTH NETWORK CORP.,

Patent Owner.

Case IPR2024-00506
Patent 8,014,394

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DEPOSITION OF DR. HENRY HOUH

Conducted Remotely

15 Ballard Terrace

Lexington, Massachusetts

January 17, 2025

9:36 a.m. to 11:39 a.m.

Reporter: Laurie J. Berg, CCR, RPR, CRR



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I N D E X

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3 DEPONENT: DR. HENRY HOUH

4 (Present via videoconference.)

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6 EXAMINATION

PAGE

7 (BY ATTORNEY CAPPAERT)

7

8 (BY ATTORNEY CHO)

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9

10 E X H I B I T S

11 NO.

PAGE

12 Exhibit 1001 United States Patent US 8,014,394 B2,

13 Sep. 6, 2011, Ram et al. (14 pages) 13

14 Exhibit 1002 Declaration of Henry H. Houh, Ph.D.

15 on Behalf of Petitioner (150 pages) 25

16 Exhibit 1003 Curriculum Vitae, Henry H. Houh

17 (13 pages) 11

18 Exhibit 1007 Declaration of Wang Xiaojing and

19 Attachments (147 pages) 49

20 Exhibit 1010 United States Patent Application

21 Publication US 2006/0224877 A1

22 Oct. 5, 2006, Jain et al.

23 (10 pages) 58

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E X H I B I T S

(continued)

NO.

PAGE

Exhibit 2001 Notice of Deposition of Dr. Henry
Houh (three pages)

6

(Original exhibits marked electronically
and retained with the transcript.)

1 P R O C E E D I N G S

2

3 (Exhibit 2001 premarked for
4 identification.)

5

6 MADAM COURT REPORTER: This is Laurie
7 Berg. I am a Registered Professional Reporter and a
8 Certified Realtime Reporter with the National Court
9 Reporters Association, as well as a Certified Court
10 Reporter with the State of New Hampshire. I am a
11 Notary Public in the State of New Hampshire and the
12 Commonwealth of Massachusetts.

13 The attorneys participating in this
14 proceeding acknowledge that I am not physically
15 present in the proceeding room, nor am I physically
16 present with the witness, and that I will be reporting
17 this proceeding remotely via videoconference.

18 They further acknowledge that, in lieu of an
19 oath administered in person, the witness will verbally
20 declare his testimony in this matter under the penalty
21 of perjury.

22 The parties and their counsel consent to this
23 arrangement and waive any objections to this manner of
24 reporting the proceeding.



1 Will the attorneys now please indicate your
2 agreement by stating your name and your agreement on
3 the record, after which I will swear in the witness
4 and we may begin.

5 MS. CAPPAERT: Kate Cappaert from
6 Steptoe, I agree.

7 MR. CHO: Taeg Sang Cho from Desmarais
8 LLP on behalf of Cisco, I agree.

9 (Deponent sworn.)

10 MADAM COURT REPORTER: Thank you very
11 much. You may proceed.

12

13 DR. HENRY HOUH

14

15 having been satisfactorily identified and
16 duly sworn remotely by the Notary Public, was examined
17 and testified as follows:

18 DIRECT EXAMINATION

19 BY MS. CAPPAERT:

20 Q. Good morning. Can you please state your full
21 name for the record?

22 A. Yes, my name is Henry H. Houh. And that's
23 spelled H-O-U-H.

24 Q. And do you understand that you're here to be



1 deposed today?

2 A. Yes.

3 Q. And that means that you will tell the truth?

4 A. Yes.

5 Q. Where are you taking the deposition from
6 today?

7 A. I am at my home in Lexington, Massachusetts.

8 Q. Do you have anyone else in the room with you
9 today?

10 A. No.

11 Q. Do you have any materials or documents in
12 front of you today?

13 A. I do.

14 Q. What do you have in front of you?

15 A. I have a printed clean copy of the
16 '394 patent. All the printouts I have are clean,
17 unmarked. I have a copy of my declaration in this
18 matter. I have a copy of the Weyman reference and I
19 have a copy of the Jain reference.

20 Q. Okay. So you have a clean copy of the
21 '394 patent, your declaration and the Weyman and Jain
22 references; is that right?

23 A. That's right.

24 Q. Do you have any windows on your computer open



1 other than this video and Agile Law?

2 A. Not on this desktop, no.

3 Q. And Dr. Houh, you've been deposed before,
4 right?

5 A. Yes.

6 Q. About how many times?

7 A. I've long lost count, but it's probably
8 around 200 times, give or take some.

9 Q. The -- I -- I will -- I will spare the time
10 in going over the ground rules for depositions because
11 of the number of times you've been deposed. But in
12 general, if you need a break, please let me know and
13 we'll try to break as soon as possible.

14 Does that sound good?

15 A. Yes, thank you.

16 Q. Is there any reason that you cannot testify
17 truthfully and accurately today?

18 A. No.

19 Q. Okay. So Dr. Houh, I entered a document,
20 Exhibit 2001.

21 Do you see that?

22 A. (Deponent viewing exhibit.) Yes.

23 Q. And this is your deposition notice for
24 IPR2024-00506, right?



1 A. (Deponent viewing exhibit.) Yes, I say that.

2 Q. And you state that Li is -- discloses that
3 the multicast router 91 looks to the maximum number of
4 multicast channels allowable on its service port in
5 order to determine whether a requesting multicast
6 client has permission to join a particular multicast
7 channel; is that right?

8 A. (Deponent viewing exhibit.) That's what
9 Paragraph 89 says.

10 Q. And so, in that, is Li, in your understanding
11 of Li, looking to the maximum number of multicast
12 channels in order to determine whether the maximum
13 number of allowable channels has been met on the
14 service port?

15 MR. CHO: Objection; form.

16 A. Well, Li does use that language of multicast
17 channels in the excerpt that I provided from Li, but
18 it's discussing the channels and the packet streams
19 and -- and how they're used in a very similar way to
20 the way the '394 patent describes multicast packet
21 streams.

22 Q. So in your declaration, you're comparing Li's
23 multicast channels to the '394 patent's multicast
24 packet streams; is that fair to say?



1 A. (Deponent viewing exhibit.) I am making that
2 mapping, but -- but if you look at this -- the
3 analysis with respect to 1k, this is part of the
4 background, but it -- I'm just simply discussing the
5 background here.

6 But later on, I do talk about the channels in
7 the section -- the -- the channels of Li in the
8 section starting on Page 91 of my declaration about
9 the limit on the number of the multicast packet
10 streams.

11 So I am -- I am mapping that, and it's
12 because the -- the way Li discusses channels is very
13 similar to the way the '394 patent discusses joining
14 multicast packet stream, for example, using an address
15 and -- and Li describes the channel -- getting the
16 channel using a -- a multicast IP address or something
17 like that. And the '394 patent, in various places,
18 talks about switching channels by switching the
19 multicast packet streams, for example.

20 Q. So -- and I believe you pointed -- you went
21 to around Paragraph 154 of Exhibit 1002; is that
22 right?

23 A. Yes, that -- that was what I was referring to
24 on Page 91, that -- that section.

