UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REOLINK INNOVATION INC. AND SHENZHEN REOLINK TECHNOLOGY CO., LTD., PETITIONER,	CASE IPR2024-00509 PATENT RE47,842
v.	
THROUGHTEK CO., LTD., PATENT OWNER.	

DEPOSITION OF YEN-KUANG CHEN, PH.D.

FRIDAY, FEBRUARY 21, 2025

3:07 p.m. PST

REDWOOD CITY, CALIFORNIA

REPORTED BY AUDRA E. CRAMER, CSR NO. 9901

DIGITAL EVIDENCE GROUP

1730 M Street, NW, Suite 812

Washington, D.C. 20036

(202) 232-0646

REOLINK 1102
Reolink v. ThroughTek
IPR2024-00509

DEPOSITION OF YEN-KUANG CHEN, PH.D., TAKEN ON BEHALF OF THE PETITIONER AT 500 ARGUELLO STREET, SUITE 400, REDWOOD CITY, CALIFORNIA, ON FRIDAY, FEBRUARY 21, 2025, AT 3:07 P.M. PST, BEFORE AUDRA E. CRAMER, CSR NO. 9901, PURSUANT TO NOTICE.

APPEARANCES OF COUNSEL

FOR THE PETITIONER:

FISH & RICHARDSON PC
BY: JESSICA WANG, ESQUIRE
MENGLIN SUN, ESQUIRE
DAVID BARKAN, ESQUIRE
60 SOUTH 6TH STREET, SUITE 3200
MINNEAPOLIS, MINNESOTA 55402
(612) 335-5070
msun@fr.com
jwang@fr.com
barkan@fr.com

FOR THE PATENT OWNER:

WPAT PC
BY: JUSTIN I. KING, ESQUIRE
8230 BOONE BOULEVARD, SUITE 405
VIENNA, VIRGINIA 22182
(703) 639-0151
jking@wpat.com

ALSO PRESENT

PETER WANG, IN-COUNSEL

CHARLES DU, GENERAL COUNSEL

I N D E X

WITNESS

YEN-KUANG CHEN, PH.D.

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E X H I B I T S

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REDWOOD CITY, CALIFORNIA

FRIDAY, FEBRUARY 21, 2025, 3:07 P.M. PST

YEN-KUANG CHEN, PH.D.

having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MS. WANG:

Q. Thank you.

I'm Jessica Wang of Fish & Richardson on behalf of petitioners Reolink Innovation, Inc. and Shenzhen Reolink Technology, Co. Here with me will be my colleagues Menglin Sun and David Barkan.

First, Dr. Chen, thank you for being here. Can you state your name for the record?

A. My name is Yen-Kuang Chen.

Q. And what is your current address?

A. 2331 Ross, R-o-s-s, Road, Palo Alto, California 94303.

Q. Have you been deposed before?

A. Say again?
Q. Have you been deposed?
A. Deposed means?
Q. Like in a deposition like this.
A. No.
Q. So you understand that you're under oath; right?
A. Yes.
Q. And you understand that you must tell the truth?
A. Yes.
Q. The whole truth?
A. Yes.
Q. And nothing but the truth?
A. Yes.
Q. And you understand that your testimony you give here today is just as important as testimony in court before a judge; right?
A. Yes.
Q. You understand that a judge may hear your deposition today?
A. Yes.

Q. And you understand that you must give truthful, complete and accurate testimony today?

A. Yes.

Q. If I ever ask a question that you don't understand, please let me know.

A. Okay.

Q. That way if you answer a question, it means that you understood it. Fair?

A. Yes.

Q. If you ever need to take a -- if you ever want to take back, add to, change or in any way modify your answer, you can let me know. Okay?

A. Okay.

Q. And I will let you do that. This way we can get truthful, complete and accurate testimony today?

A. Okay.

Q. We will take breaks about every once an hour, but if you need to take a break sooner than that, just let me know.

A. Okay.

Q. You understand that a court reporter is typing up everything in a transcript; right?

A. Okay.

Q. And you understand that you will get to read that transcript and make changes to your answers?

A. Okay.

Q. If you do make changes though, we can tell the judge that you changed your testimony.

A. Okay.

Q. So that's another reason why you should give truthful, complete and accurate testimony today.

A. Okay.

Q. Is there any reason, medical or otherwise, that prevents you from giving truthful, complete and accurate testimony?

A. No.

Q. And if that ever changes, just let me know.

A. Okay.

Q. Okay. Dr. Chen, how did you prepare

for your deposition today?

A. What do you mean by that?

Q. Did you meet with anyone before this deposition to prepare?

A. I don't understand your question.

Q. So you were informed by someone that you had to come to this deposition; correct?

A. Yes.

Q. After that, did you meet with anyone to talk about this deposition?

A. No. I don't understand your question because I know I have to come here, but what do you mean by meet with someone else?

Q. Did you discuss this deposition with anyone?

A. I don't even know what a deposition is until I come here.

Q. Okay. So before the start of this deposition, you did not understand what a deposition is; correct?

A. Yes.

Q. Do you have any questions you would

like to clarify first before we go forward?

A. I only know I'm coming here; you're going to ask me question about my declaration. That's all I know so far.

Q. Did you review any documents before today?

A. I only review my document which is my declaration.

Q. You only reviewed the declaration that you submitted for this case; correct?

A. Yes.

MS. WANG: Okay. So I'll have marked as Exhibit 1, your declaration.

(Whereupon, Chen 1 was marked for identification.)

MS. WANG: I'm giving the witness Exhibit 1. I have a couple copies. A copy for opposing counsel and one more extra for you.

Q. Take your time, Dr. Chen, in reviewing it, and let me know when you're done.

A. I think this is the same as the one I submitted, I assume.

Q. Yeah. You can review it if you like.
A. Yeah. I reviewed it before coming.
Q. Okay. So, Dr. Chen, you have a copy of Exhibit 1 in front of you; correct?
A. Yes.
Q. Okay. Let's flip to paragraph 9.
A. Before we go to paragraph 9, can I make -- declaration, I make a typo in the document.
Q. Okay.
A. In paragraph 3, page 2, around the end of the line 4 on page 2, it should be in 2002, not "in 2002 and 2023."
Q. So cross out "and 2023."
A. Yeah. Two words need to be crossed out.
Q. Okay. It reads now, "In 2002, I published papers on..."
A. That's right.
Q. Okay. Thank you for that clarification.
A. Sorry. I interrupt you.

Q. No, you're good. Thank you.

So in paragraph 9 you say, "I have cursorily reviewed Dr. Bims's declaration regarding the invention referenced above, along with Dr. Bims's background and qualifications."

A. Yes.

Q. What did you mean by "cursorily reviewed"?

A. I got a copy of his declaration, and I just review it, and I also do a little bit search on the Internet to understand Dr. Bim's background.

Q. Okay. So you said you just reviewed his declaration. Does that mean you skimmed his declaration?

A. I read his declaration, yes.

Q. You read his declaration?

A. Yes.

Q. In total, how long did you spend, about, reading Dr. Bim's declaration?

A. I don't remember.

Q. Was it a few minutes?

A. Probably more than that.
Q. Was it an hour?
A. I don't remember.
Q. Could it have been less than five hours?
A. Probably.
Q. Okay. In paragraph 19 you state that, "Adapting the image recognition related technique, for enhancing users' experience in establishing the point-to-point connection is novel and is not per se obvious at the time when the '842 patent's earliest application was filed."
A. Yeah.
Q. What did you mean by, "per se obvious"?
A. To me in my opinion, it's not obvious.
Q. So what is the difference between, "per se obvious" and "obvious"?
A. I would say just not obvious. We can remove these two words in the declaration.
Q. Okay. Then why did you add these two words in this declaration?

A. Sometimes I think it's probably the bad verbal happens; right? I may add some words probably not necessary. So when you start questioning me about detailed wordings, I would just say maybe just change it to "is not obvious."

Q. Then in paragraph 21 --

A. Uh-huh.

Q. -- you state that you "have not seen or encountered any suggestion, both in academic field and professional capacity, to adapting any image recognition technique onto the Point-to-Point practice and to enhance the users' experience on establishing Point-to-Point connection at the time when the '842 patent's earliest application was filed."

Do you see that?

A. Yeah.

Q. Have you looked for any prior art relating to adapting any image recognition technique on to the point-to-point practice and to enhance the user's experience on establishing

point-to-point connection, specifically for this case?

A. No.

Q. Have you looked for any prior art specifically for this case?

A. No.

Q. Okay. Now, back in paragraph 2 on page 1, you said that you worked for Intel for over 20 years.

A. Yes.

Q. When did you leave Intel?

A. 2019.

Q. And why did you leave Intel?

A. I got a job.

Q. Was that job offer from Alibaba?

A. Yes.

Q. And what was your last position at Intel before you left?

A. My last position before I left, principal engineer or principal research scientist, we use it, you know, interchangeably.

Q. So after leaving Intel, did you

immediately join Alibaba in 2019?

A. Yes, with couple days in between the job.

Q. So you got a job offer from Alibaba. Did they just recruit you or --

A. Yes.

Q. So they reached out to you?

A. Yes.

Q. Why did you decide to change to Alibaba?

A. Getting better paid.

Q. What position did you have when you joined Alibaba?

A. I joined Alibaba as senior director and chief scientist of computer technology in Alibaba Damo academic.

Q. What position did you have when you left Alibaba?

A. Same position.

Q. And when did you leave?

A. I think it was August 2023 or...

Q. And why --

A. Or wait. Wait. 2023 or 2022. I probably need to look up.

Q. No worries.

A. But I can tell you probably last day of work August 31.

Q. Okay.

A. Yeah.

Q. And why did you leave?

A. You know, I don't like the job.

Q. Okay. Why didn't you like the job?

A. Does it matter to you in this case?

Q. It might.

A. Tell me why.

MR. KING: Objection. I don't think that there's any relevancy.

BY MS. WANG:

Q. If you don't want to share, that's fine.

Why did you rejoin Intel?

A. I got offer.

Q. Did you immediately go back to Intel after Alibaba?

A. No.
Q. What did you do in between?
A. I take a break.
Q. Is that it?
A. And then teach Santa Clara University.
Q. Anything else?
A. Yeah, mostly. I do a little bit -- try to do a little bit of startup in between. That's it.
Q. Startup?
A. Yeah.
Q. What startup was that?
A. Princeton AI Group.
Q. So now you are back at Intel as a senior principal engineer; correct?
A. Yes.
Q. What are your job responsibilities as a senior principal engineer?
A. Not related to this case. I can say it's confidential. It's my job at Intel.
Q. Well, you're here as an expert; correct?

A. Okay. Yes.

Q. So that implies that you have possibly certain credentials that qualify you as an expert.

A. Yes.

Q. So I'm just trying to understand kind of your background --

A. Yes.

Q. -- to see your qualifications.

A. Okay. So then I can answer you the question is, I'm doing research and development for Intel next generation products.

Q. Thank you.

A. And Intel is technology company, so I'm doing research and development on technology.

Q. Why are you working as an expert in this lawsuit?

A. Actually, I have experience in those kind of things or back maybe almost 20 years ago called machine-to-machines.

Q. Okay. Have you worked as an expert for other cases?

A. No.

Q. So why are you working as an expert here when you have a full-time job at Intel?

MR. KING: Objection. I think that's a relevance issue here. It's not relevant.

BY MS. WANG:

Q. You can still answer even though he objects.

A. Can you repeat your question?

Q. You're working full-time at Intel; correct?

A. Yes.

Q. So why are you also working as an expert for this case?

A. Can you rephrase the question? What do you want to get out of this question?

Q. I just want to know why you're taking this job on top of your full-time job at Intel.

A. Is there any reason I cannot do other things than my full-time job?

Q. No. I'm just curious.

A. I'm just curious on this case, and I

decide to help.

Q. In paragraph 7 of your declaration, you state that you "have been continuously involved in the latest technological development and commercial practices of the industry upon my education and my direct industrial involvement."

Do you see that?

A. Yes.

Q. What industry are you talking about here?

A. I was a general, you know, computer-related industry from semiconductors to applications.

Q. Is P2P technology part of that industry?

A. P2P -- depends on your definition of the P2P. Can you define what's P2P?

Q. We can go with point-to-point technology.

A. Okay. Yes.

Q. How have you been involved with P2P technology through your education?

A. State your question one more time.

Q. How have you been involved with P2P technology through your education?

A. Are you trying to ask why educated for the P2P technology?

Q. Well, in paragraph 7 you said you have been continuously involved with the technology of the industry "upon my education."

A. Yes.

Q. So I'm trying to see, how have you been involved with P2P technology, which you say is part of the industry --

A. Yes.

Q. -- through your education?

A. So my education is in EECS, and EECS cover great wide areas, including IOT, including part of it is this point-to-point.

Q. Including IOT, could you please define that.

A. Internet of things.

Q. So your education is in EECS, which you said is broad; correct?

Did you specifically study anything relating to P2P technology?

A. In my opinion, there are so many technology under EECS. There are some things that are started before. There are some things that I don't start in. But I don't think your question -- I don't understand the purpose of your question.

Q. So you said there is some things in EECS that you studied?

A. Yes.

Q. Does P2P technology fall under that group?

A. Yeah, under EECS.

Q. Do you specifically study P2P technology?

A. Do I specifically study P2P technology?

Q. Uh-huh.

A. I have some familiarity with it.

Q. Through your education?

A. Not through my education. It's through my practice and through my readings of technical

papers, technical articles.

Is that okay Jessica that we change the word to articles?

Q. That's fine.

Okay. So you said that you have familiarity with P2P through your practice.

A. Yes.

Q. Can you please describe what you mean by getting familiarity through your practice?

A. Okay. Let me try to see if I can make things clear. I got my PhD from Princeton in 1998, and I joined Intel as a researcher, and I've been looking for emergent technology that potentially will be the next gold mine for the computer industry.

I've been studying many different fields while I was in Intel labs, and one of the areas that I'm studying is called Internet of things. Some people also call it machine-to-machine about that time.

Okay? And I have not only written research articles, papers, I've been working

with a number of different professors, and myself have published research articles related to the Internet of things or machine-to-machines.

And I also have done some work reading on some systems in use in the lab or even use my home as a lab to practice that. And P2P is a technology that eventually I think is a wonderful idea that Internet of things, when you have an object in your house, we call it "things," but these things can be a device that you want to connect to the Internet or back even to your smartphone that require certain technology to make that two device connect to each other.

And there are many different technology has been used try to bring two things together, and point-to-point technology is one of them.

Q. Okay.

A. Did I answer your question?

Q. Not quite. I appreciate the explanation.

You mentioned, like the work you've done, the papers you've read, et cetera. Were any of those specifically about P2P technology?

A. You mean, do I publish any papers on them?

Q. Sure.

A. No, I don't.

Q. Did you read any articles about P2P technology?

A. Yes.

Q. When was that?

A. I don't remember precise years, but around the same time I was doing the IOT or M2M technology research.

Q. And that would have been your first period at Intel?

A. Among the first period in Intel.

Q. Okay. Was that near the beginning or near the end?

A. Probably in the middle.

Q. Okay. And then you also mentioned that you did some work building systems.

A. Yes.

Q. Did those systems include P2P technology?

A. Yes.

Q. Can you describe the systems that you made that include P2P technology?

A. Sure. One of them called smart home.

Q. Smart home?

A. Smart home, yes.

Q. Any other examples?

A. I think small homes one of the areas I was interested in.

Q. Can you remember any other systems that you've made using P2P technology?

A. I don't recall at this point.

Q. And when were you working on this smart home?

A. Probably around 2014. I made start become interested in it in -- early 2010ish. Okay? But I'm pretty much sure I build a smart home system in 2014.

Q. Okay. So you were -- so you got

interested in this smart home idea in 2010ish, and were you working on the smart home throughout the time, and then in 2014 you finally created the system?

A. Yes.

Q. How did your smart home use P2P technology?

A. The P2P technology help when I set up the scenes to connect to my phone. Also to ensure in the future if I want to connect back to the system, that P2P can be used.

Q. Okay. And we're going to kind of circle back to paragraph 7. We were talking about the industry that you worked in, and we talked about how P2P technology is part of the industry.

A. Okay.

Q. Is image recognition technology also part of that industry?

A. Yes.

Q. And when it comes to your education, did you studied image recognition technology?

A. Yes.

Actually, the reason I'm a little bit hesitant here, I can explain.

There are many things under image recognition. Barcode reading, QR code reading is only a part of it. Actually, I do a lot of image recognition to recognize like humans or objects or emotions in objects.

Q. Okay.

A. So, actually, if you want to ask me, I would say I do a lot of research on image recognition.

Q. Okay. Then did you do research or studied QR codes or barcodes?

A. No, but I know how it works.

Q. When you were working, did you read publications about QR codes or barcodes?

A. Maybe.

Q. Did you write any publications about QR codes?

A. I think so, but I don't remember when --

Q. Okay.
A. -- and how much I read.
Q. Sorry.
To clarify, I asked did you write any?
A. No.
Q. Okay. Just so that's clear on the record, I'll ask one more time: Did you write any publications relating to QR codes or barcodes?
A. No.
Q. Did any of those systems that you've built include barcodes or QR codes?
A. The system I built, does it include QR codes or barcode? The system I build after 2014, yes.
Q. So before 2014, you didn't build any systems that used QR codes or barcodes; correct?
A. Correct.
Q. Back to the industry we were talking about, is the hole puncture technique part of that industry?
A. Uh-huh.

Q. And throughout your education, did you study the hole puncture technique?

A. Maybe you should define what you mean by -- what do you mean by study?

Q. Did you take any classes that discussed the hole puncture technique?

A. No.

Q. Did you conduct any research on the hole puncture technique?

A. No. By the way, sorry. Let me take that back. Can you define "research"?

Q. Sure.

Did you conduct any experiments relating to the hole puncture technique?

A. Define "conduct."

Q. When you were in school, you did research of some sort; correct?

A. So let me explain. In my definition, research including reading technical papers.

Q. Okay.

A. And then develop certain proposal or build certain prototype to test the hypothesis

and then verify the hypothesis. That would be my definition of research.

Q. Okay.

A. Okay. But if reading article is part of research, then yes, but if you're talking about build my own or write code to do the hole puncture technology, then no.

Q. To clarify, you read publications about the hole puncture technique; correct?

A. I may.

Q. You made?

A. I may.

Q. But might have?

A. Yes.

Q. But you don't remember clearly?

A. Correct.

Q. When you were building your systems, did any of them involve the hole puncture technique?

A. Yeah. In 2014, yes.

Q. Is this the same smart home system?

A. Yes.

Q. So this smart home system that you built, used both the P2P technology and the hole puncture technology; correct?

A. Yes.

Q. Were there any other systems that you built that used the hole puncture technology?

A. I don't remember, but I remember creating for this smart home system.

Q. Okay. And earlier you said that you were kind of -- you had this idea for the smart home system in 2010ish. Did that include the idea of using hole puncturing?

A. I don't think so.

Q. At the time, the 2010ish period, did that idea include the use of P2P technology?

A. I don't think so.

Q. So what was the idea you were exploring in that 2010ish period?

A. In 2021 [sic], we actually looking at almost every single technology that can change Internet of things or-machine-to-machine connection from very low level circuit design,

energy harvesting, to communications, specific about what is communications or machine type communications to device management, to data analytics, to vertical applications such as smart agriculture, intelligent transportation systems and smart home.

Q. Just to clarify, it reads "2021."

A. Sorry. 2011.

Q. 2011.

A. Yeah.

Q. So that's when you were exploring all these ideas, and then eventually you developed the smart home in around 2014?

A. So specifically, we are reading research papers; right? But in 2014 I build a smart home system.

Q. Did any of those papers include image recognition techniques?

A. Not as I know of.

Q. But then those papers --

A. Wait. Wait. Sorry. Let me take it back.

So what do you mean by "those papers"?

The paper that I read or the papers I wrote?

Q. We can start with the papers you read.

A. I don't remember, but I'm sure I don't write paper.

Q. Okay. So you're not sure if the papers you read talked about things like QR codes or barcodes; correct?

A. That's correct.

Q. But those papers you read talked about P2P technology?

A. Maybe, but I don't remember.

Q. Okay. And did those papers you read talk about the hole puncture technique?

A. I may encounter the hole puncture technology, not in this particular context.

Q. In what context did you encounter it?

A. I think it's mostly for building home servers or connecting your computers to your home computers when you are traveling outside your house.

Q. Okay. When you say "building home servers," can you please describe that or explain?

A. Let's say you have photos stored at your home, and now say you want to retrieve your photos outside your house.

Q. Okay. So I'll have like an image stored somewhere, and then I want to see it somewhere else?

A. Yes.

Q. You're working on that in this period of the early 2010s?

A. Define "working on it."

Q. Sorry. You were reading about it?

A. Yes.

Q. Okay. Let me clarify this for the record.

In around 2011, you were reading articles that discussed the concept of where an image is stored in one place, you can access it from a different place; correct?

A. Yes.

Q. Thank you.

Can you please list all the people that were involved in writing your declaration.

A. Mostly me.

Q. Did anyone else work on this declaration?

A. I think I gave a copy to Justin and Charles.

Q. Anyone else?

A. They are not my contact points.

Q. Who wrote the first draft of your declaration?

A. I did.

Q. What is Charles' contribution to your declaration?

A. I think Charles may be just asking questions. And, for example, if I don't write it clearly he asks, "What does it mean?" That's it.

Q. What about Justin?

A. Similar.

Q. Did you review your final declaration

before signing it?

A. Yes.

Q. And when did you start working on this declaration?

A. I don't remember precise timeframe. Probably late last year.

Q. Okay. So on the last page, your declaration bears the date November 14, 2024.

A. Okay.

Q. Does that kind of remind you of when you might have started writing your declaration or working on your declaration?

A. Yeah. I think probably October timeframe.

Q. How long did you spend on your declaration?

A. I don't remember precisely how long I take it.

Q. Do you think it's about a couple hours?

A. Maybe.

Q. Do you think more than 10 hours?

A. No.

Q. More than five?
A. Probably not.
Q. More than two hours?
A. Don't remember. Maybe.
Q. Are you being compensated for your work on this case?
A. I think so.
Q. What do you mean by you think so?
A. Because I was told I will be paid certain fee to come here.
Q. But you're not sure if they will pay you?
A. Yes.
Q. Why you are you not sure?
A. To me, pay is not mostly important thing to come here.
Q. Do you have an agreed-upon rate?
A. No.
Q. So you're working on this case and thinking that maybe in the future they might pay you an unknown amount?
A. That's fine.

Q. Do you know how many hours roughly in total you've spent on this case?

A. I don't remember.

Q. More than five hours?

A. Maybe. Today if we keep the conversation going, maybe.

Q. Okay. And I think earlier you just stated that the pay is not the most important thing for you.

A. Correct.

Q. What is the most important thing for you, for working on this case?

A. I think justice, the right thing to do.

Q. Why do you think this is the right thing to do?

A. State the truth.

Q. Do you have any -- like prior to this case, did you have any relationship with ThroughTek?

A. I know -- I know them.

Q. What do you mean by you "know them"?

A. So one of the founders of Throughtek is

Patrick, and I know Patrick through trade show. We also been on the stage together in some of the forums discussing IOT, smart home, machine-to-machines.

Q. To clarify is it "Patrick"?

A. Yes.

Q. Did you have any other relationships to Throughtek before this case?

A. What do you mean have "relationships"?

Q. Were you acquainted with anyone at Throughtek other than Patrick?

A. I may know a few other people.

Q. But no other friends or family members at Throughtek; correct?

A. I don't have family member, as far as I know.

Q. And you were not familiar with any of Throughtek's counsel before this case; correct?

A. No.

Q. So to summarize that, the only personal connection you had with Throughtek prior to this case was Patrick; correct?

A. Yes.

Q. Would you say you're close with Patrick?

A. Define "close."

Q. Would you call him your friend?

A. Define "friend." Which level of friends you consider friends?

Q. Would you invite Patrick to a wedding?

A. Probably not.

Q. Would you ask Patrick out for dinner?

A. It depends.

Q. Have you and Patrick gone to dinner or something similar?

A. I think I have lunch with Patrick probably with a number of other people.

Q. Was Patrick the one who reached out to you about this case?

A. Yes.

Q. And what did he say to you when he reached out?

A. So he told me about this case and told me about Dr. Bim's declarations and asked me my

expert opinion to take a look at it.

Q. What did he say about this case?

A. I know it's a litigation between two companies. I'm not sure litigation is the right word to use.

Q. Anything else that he said?

A. You mean this case or besides this case?

Q. Besides this case, just in general when he reached out to you, what else did he say?

A. When he reach out to me, he provide some background about this case.

Q. And that's it?

A. Yeah. What else? Well, we made -- define your friends; right? We may say other things like, "How's your family?" things like that.

Q. Okay. So then after he reached out to you, what made you agree to be an expert for this case?

A. I think it's about the justice.

Q. What do you mean by "justice"?

A. In my opinion, Dr. Bim's declaration has problem/issues.

Q. Did you review the prior art in Dr. Bim's declaration?

A. I did.

MS. WANG: Okay. We've been going on for about an hour. Would you guys like a break?

MR. KING: That's what I was thinking of too.

MS. WANG: Take like 15?

(Recess taken.)

BY MS. WANG:

Q. Dr. Chen, during the break, did you talk about the substance of your testimony with counsel?

A. Yes.

Q. What did you talk about?

A. I'm asking why are you asking those questions?

Q. Anything else that you talked about?

A. You mean, about this case?

Q. Yes.

A. No. Just curious about why you asking some of the questions.

Q. What did your counsel say?

A. He said just SOP, standard procedures.

Q. Okay. Have you read the '842 patent?

A. Yes.

Q. When did you read it?

A. Probably last year probably around the time I was writing the declaration.

Q. When you say "last year," it was around October or November?

A. Yes.

Q. How long did you spend reading the '842 patent?

A. I don't remember. Yeah.

Q. Would you say less than five hours?

A. Sure.

Q. Less than two hours?

A. I think so.

Q. Less than one hour?

A. I'm not sure.

Q. And what is your definition of a person

of ordinary skill in the art for the '842 patent?

A. My definition of...

I would say someone, you know, studied in the EECS-related field and may have programming skills.

Q. Programming skills?

A. Yes.

Q. Before I asked that question, had you thought about a definition for a person of ordinary skill in the art?

A. I was never asked to define it.

Q. Okay. So prior to -- let me start again.

Before today, you did not define a person of ordinary skill in the art; correct?

A. I have not legally defined it before today.

MS. WANG: Okay. That's all for me.

MR. KING: Are you done?

MS. WANG: Yes.

/// ///

EXAMINATION

BY MR. KING:

Q. I'd like to do a little cross.

Professor, do you recall that we actually had discussion before your declaration here over the conference with this declaration?

A. Yes.

Q. Okay. So do you recall that we discussed some of the issues on technical points in the declaration?

A. Yes.

Q. And I did provide you with my final draft to you, which is the one in front of you?

A. You provided.

Q. Yes. Also, I provide you with a final draft so you can sign it, through Charles of course, through Charles?

A. Did I write it?

Q. No. No. I said I write the final draft and give to Charles, so I give that to you, based on discussion?

A. Yes.

MR. KING: Okay. No more questions.

MS. WANG: Thank you.

(At 4:22 p.m., the deposition of YEN-KUANG CHEN, PH.D. was adjourned.)

STATE OF CALIFORNIA)
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I, AUDRA E. CRAMER, C.S.R. No. 9901, in and for the State of California, do hereby certify:

That, prior to being examined, the witness named in the foregoing deposition was by me duly sworn to testify the truth, the whole truth and nothing but the truth;

That said deposition was taken down by me in shorthand at the time and place therein named, and thereafter reduced to typewriting under my direction, and the same is a true, correct and complete transcript of said proceedings;

I further certify that I am not interested in the event of the action.

Witness my hand this 21st day of February, 2025.

Certified Shorthand
Reporter for the
State of California

Yen-Kuang Chen, Ph.D.
WPAT PC
8230 BOONE BOULEVARD, SUITE 405
VIENNA, VIRGINIA 22182

Case: Reolink Innovation Inc. et al. v. Throughtek Co. Ltd.
Date of deposition: February 21, 2025
Deponent: Yen-Kuang Chen, Ph.D.

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STATE OF CALIFORNIA)
COUNTY OF SAN MATEO) SS.

I, AUDRA E. CRAMER, C.S.R. No. 9901, in and for the State of California, do hereby certify:

That, prior to being examined, the witness named in the foregoing deposition was by me duly sworn to testify the truth, the whole truth and nothing but the truth;

That said deposition was taken down by me in shorthand at the time and place therein named, and thereafter reduced to typewriting under my direction, and the same is a true, correct and complete transcript of said proceedings;

I further certify that I am not interested in the event of the action.

Witness my hand this 21st day of February, 2025.

Certified Shorthand
Reporter for the
State of California