

1 Q. So it is no longer your opinion that
2 Limitations 1E and 1F are disclosed in Sung '817 and
3 Sung '786?

4 MR. CHAN: Objection. Form. Misstates
5 testimony.

6 THE WITNESS: I provided my professional
7 knowledge and the technologies for that, and also my
8 viewpoint, technical viewpoints to the lawyers, and
9 also, I made sure that my technical viewpoints are
10 accurate. Then together with the lawyer, we completed
11 this declaration, and I just also made my confirmation
12 to my part of it.

13 Regarding Limitations 1E and 1F, that is a
14 mathematic understanding or mathematic viewpoint. I
15 just provided my opinion based on that.

16 For instance, from 1 to 150, whether the 50
17 was included in it or not, for that, I, of course, will
18 say, yes, it was included in it.

19 BY MR. HA:

20 Q. Okay. So let me try to clarify the record
21 and, I think, again, it will speed up things if you can
22 answer "yes," "no," or "I can't make that
23 determination," or something to that effect, and then
24 provide your clarification.

25 So is it still your opinion that the

1 invention, as reflected in Limitations 1E and 1F of the
2 '802 patent are disclosed in Sung '817 and Sung '786?

3 MR. CHAN: Objection. Form.

4 THE WITNESS: I still want to emphasize that I
5 was focusing on the professional part of it. The lawyer
6 did not inform me about the legal matters of this. He
7 asked me, for instance, from 1 to 150, if 50 was
8 included in it or not. I gave him the answer, and I
9 said "Yes."

10 In terms of the legal viewpoint, whether this
11 is included in there or not, I'm not clear about that.

12 I am a technical expert, and if you keep
13 asking me about the patent issues, patent questions, I
14 don't really know how to handle or answer that. If you
15 ask me about some technology things and try to
16 clarify -- ask me to clarify the technology part of it,
17 then I can do that. You can ask me those questions.

18 BY MR. HA:

19 Q. Understood.

20 So I shouldn't ask you for your legal
21 conclusion whether Limitations 1E and 1F of the '802
22 patent are disclosed in Sung '817 and Sung '786,
23 correct?

24 MR. CHAN: Objection. Form.

25 THE WITNESS: I hope that in all these patents

1 you can ask me about the technical matters and issues
2 covered in them, and I will try to make the
3 clarification or try to make it clear for you so that
4 you can make some determination about some issues.

5 BY MR. HA:

6 Q. I appreciate your candidness about that and I
7 want to explain to you why I keep asking these.

8 Because when you submitted this declaration to
9 the Board, you basically made a legal conclusion based
10 on your technical expertise about what you believed is
11 either disclosed or not disclosed in Sung '817 and Sung
12 '786 relative to Limitations 1E and 1F. This is why I'm
13 asking you these questions.

14 This is why your lawyer drafted this sentence,
15 which is based on the legal principles in section 2 of
16 this declaration, "I understand that the priority date
17 of certain claims of the '802 patent depends on whether
18 a POSITA would reasonably understand that the subject
19 matter of those claims was disclosed in Dr. Sung's
20 earlier application."

21 Do you understand that?

22 MR. CHAN: Objection. Form. Argumentative.

23 BY MR. HA:

24 Q. So, unfortunately, I have to get your answer
25 for the record so that the Board can understand the

1 overall situation.

2 So I will ask it one more time, which is:

3 Do you have an ultimate conclusion whether
4 Limitations 1E and 1F of the '802 patent are disclosed
5 in Sung '817 or Sung '786?

6 MR. CHAN: Objection. Form. Calls for a
7 legal conclusion.

8 THE WITNESS: I still want to emphasize that
9 the result of the technical content, my job is to do the
10 correct determination of those. Then I will inform my
11 lawyers that, based on my personal profession, I made an
12 accurate judgment and determination of that.

13 Regarding the legal part of it, it was our
14 lawyers handle that, and together with the lawyer, we
15 added and compiled this declaration. But right now, as
16 I see it, I believe that is disclosed in there because
17 50 micron is included in the range of 1 to 150 micron.

18 BY MR. HA:

19 Q. Okay. So your opinion is that Limitations 1E
20 and 1F of the '802 patent are disclosed in the earlier
21 Sung '817 and Sung '786, correct?

22 A. If, just like I mentioned, that based on my
23 profession, 50 micron is included in 1 to 150 micron,
24 with that as the basis, I would say that is disclosed.

25 Q. Okay. And you're recognizing that your

1 opinion is directly in contradiction with Dr. Sung's
2 opinion where he said this invention of the '802 patent
3 is not disclosed in any of the patents or patent
4 applications to which the '802 patent claims priority.

5 Do you recognize that?

6 MR. CHAN: Objection. Form. Argumentative.

7 THE WITNESS: I don't know. This is a legal
8 matter. I don't know.

9 BY MR. HA:

10 Q. Well, Dr. Sung is also a scientist, right?

11 MR. CHAN: Objection. Form. Calls for
12 speculation.

13 THE WITNESS: I don't know.

14 BY MR. HA:

15 Q. You don't know if Dr. Sung is a scientist?

16 MR. CHAN: Objection. Form. Calling for
17 speculation.

18 THE WITNESS: I don't know what kind of person
19 Dr. Sung is.

20 BY MR. HA:

21 Q. Do you know if Dr. Sung is a lawyer?

22 MR. CHAN: Objection. Form. Calling for
23 speculation.

24 THE WITNESS: I don't think it's relevant to
25 me.

1 Why should I know that?

2 BY MR. HA:

3 Q. Well, because your opinion, as a scientist, is
4 in direct contradiction with Dr. Sung's declaration
5 here, who you have co-authored numerous papers with.
6 That's why it's relevant.

7 MR. CHAN: Objection -- go ahead.

8 BY MR. HA:

9 Q. My question is: Do you still stand by your
10 opinion that Limitations 1E and 1F of the '802 patent
11 are disclosed by the earlier Sung '817 and Sung '786,
12 despite the fact that Dr. Sung himself declared this
13 invention is not disclosed in any of the patents or
14 patent applications to which the '802 patent claims
15 priority to?

16 MR. CHAN: Objection. Form. Argumentative.
17 Also asked and answered.

18 THE WITNESS: Well, I would still like to say
19 that I made this determination based on my profession.
20 I saw that this is in this range, and that is the fact
21 that I see. I don't care about any other issues.

22 BY MR. HA:

23 Q. Okay. That's fair. And I appreciate that.

24 You're going to like my next statement, which
25 is, I just have a few set of remaining questions, and we

1 should be done soon. Okay.

2 So I had some lingering questions about your
3 use of an interpreter based on some of the testimony you
4 gave yesterday.

5 And yesterday, when I asked you to read
6 paragraph 68 of your '862 declaration, you said that you
7 required the aid of an interpreter, and then I'll quote
8 this language, "because it covered some patent
9 terminologies so through translation, I can have a more
10 accurate understanding."

11 Do you remember testifying to that effect?

12 MR. CHAN: Objection. Form. Misstates
13 testimony.

14 THE WITNESS: (In English) I don't remember.
15 BY MR. HA:

16 Q. Okay. Well, then, let me also remind you of
17 what you said yesterday when I asked you if you relied
18 on a translator before submitting your declaration, you
19 said, and I'll quote again: "On my translation, to do
20 some translation," and that you also have, quote again,
21 "a person physically helped me to translate about the
22 professional portion or contents that they intend to
23 discuss."

24 Do you remember that testimony?

25 MR. CHAN: Objection. Form. Misstates

1 testimony.

2 THE WITNESS: (In English) I don't remember.

3 BY MR. HA:

4 Q. Did you, in fact, use an online translation
5 tool to do some translation before submitting your
6 declaration?

7 A. In the whole process, we had online
8 translation, as well as the translation through the
9 assistant. We would interchange of using these two.

10 Q. Do you remember which online translation tool
11 you used?

12 MR. CHAN: Objection. Form. Relevance.

13 THE WITNESS: I don't remember.

14 BY MR. HA:

15 Q. Not even a website? Nothing? You can't
16 remember anything?

17 A. (In English) I don't remember.

18 Q. Do you remember which portions of your
19 declaration that you used through the online translation
20 tool?

21 MR. CHAN: Objection. Form.

22 THE WITNESS: (In English) I don't remember.

23 BY MR. HA:

24 Q. Was it most of your declaration or a small
25 portion of your declaration? Can you provide some

1 estimate?

2 MR. CHAN: Objection. Form.

3 THE WITNESS: (In English) I don't remember.

4 BY MR. HA:

5 Q. Can you please identify the person who helped
6 you translate some of your declaration?

7 A. (In English) I don't remember.

8 Q. You don't remember the person who helped you
9 translate?

10 A. (In English) I don't remember.

11 Q. Was it one person? Ten people? Five people?
12 What was the number of people that you used to
13 translate?

14 MR. CHAN: Objection. Form.

15 I'll caution the witness not to disclose any
16 attorney-client information.

17 To the extent you can do so, you may proceed.

18 THE WITNESS: (In English) I don't remember.

19 BY MR. HA:

20 Q. You did not get any sworn testimony from the
21 translator who provided the translation of your
22 declaration so you can clearly understand it, correct?

23 MR. CHAN: Objection. Form. Relevance.

24 THE WITNESS: (In English) I don't remember.

25 BY MR. HA:

1 Q. Did you independently verify whether the
2 translations provided by the translator were accurate
3 utilizing, let's say, a check interpreter?

4 A. (In English) I don't remember.

5 Q. And to be clear, you were not comfortable
6 reading and understanding many portions of your
7 declaration during these depositions without the aid of
8 an interpreter, correct?

9 MR. CHAN: Objection. Form. Argumentative.
10 Misstates testimony.

11 THE WITNESS: I was okay with the
12 professional-technical portions of them. Regarding the
13 legal matters, I tend to have difficulties.

14 MR. HA: Understood.

15 And I very much appreciate your time. I know
16 it's been a grueling three days of deposition. I very
17 much appreciate all of your helpful answers, and I also
18 want to just make one note.

19 I think, on day 1, you were a little flustered
20 by the process and you said, you know, please don't
21 treat me like a criminal. If you felt that way, I want
22 to apologize on the record one more time. It was not
23 intentional in any way.

24 THE WITNESS: Okay, thank you.

25 MR. CHAN: Pass the witness?

1 MR. HA: Pass the witness.

2 MR. CHAN: I have redirect, but let's take a
3 break, since it's been more than an hour.

4 (A recess was taken from 5:06 p.m. to 5:16
5 p.m.)

6

7

EXAMINATION

8 BY MR. CHAN:

9 Q. Dr. Tsai, I have some follow-up questions for
10 you.

11 I recall you and counsel for petitioner drew
12 two illustrations earlier today, and they are marked as
13 Exhibits 1047 and 1048. I'm going to hand them to you.

14 Do you remember those two illustrations?

15 A. Yes.

16 Q. Let me ask you some questions about 1048
17 first.

18 Now, you previously testified there were two
19 baselines, am I right?

20 A. (In English) Yes.

21 Q. Now, at some point today, you also appeared to
22 suggest that there are two designated profiles in the
23 context of measurement, and it seems to me that you
24 testified to something you did in Exhibit 1004, and --
25 do you have 1004 in front of you? 1004 reflects your

1 experiment, is that correct?

2 MR. HA: Objection. Form.

3 THE WITNESS: Yes.

4 BY MR. CHAN:

5 Q. So it seems to me that you may be mixing
6 between your experiment and the '802. So for the
7 clarity of this record, I have some follow-up questions
8 for you.

9 MR. HA: Objection. Form.

10 THE WITNESS: (In English) Yes.

11 BY MR. CHAN:

12 Q. Now, looking at Exhibit 1048, earlier, you
13 testified to the baseline or substrate as DP 1.

14 Do you see that?

15 A. Yes, I see that.

16 Q. And you also pointed to the orange line at the
17 very top as No. 2, is that correct?

18 A. I see that.

19 Q. Okay. So I don't understand what you mean
20 when you draw -- when you call it a baseline versus
21 designated profile.

22 So explain to me, when you draw No. 1, is that
23 a baseline or is that a designated profile?

24 A. We call it a baseline.

25 Q. When you say "a baseline," are you referencing

1 Dr. Sung's '802 patent, or are you referencing the
2 experiment reflected in Exhibit 1004?

3 A. That is a designation from my experiment.

4 Q. So when you draw the No. 1 line in green,
5 which you called designated profile, you're referencing
6 your experiment in Exhibit 1004?

7 A. Yes.

8 Q. So what is DP No. 2, or designated profile
9 No. 2?

10 A. That is Dr. Sung's definition.

11 Q. Okay. Then I think I'm understanding this
12 correctly.

13 So when you draw the top orange line, which I
14 think, at some point, you also called a baseline, that
15 is Dr. Sung's designated profile, is that correct?

16 A. Yes. We want to define or figure out the
17 number of working particles. We usually define from the
18 top, and so Dr. Sung defined this from the top.

19 Q. Now, you are at Claim 1 of the '802 patent,
20 correct? Strike that.

21 Did you read Claim 1 of the '802 patent?

22 A. (In English) Yes.

23 Q. I'll read this in the record. Claim 1 says,
24 partially: "A tip of each of the plurality of
25 superabrasive particles aligns along a designated

1 profile."

2 A. Yes.

3 Q. I think counsel for petitioner pointed out to
4 you earlier today about that phrase "designated
5 profile."

6 Can you use this red pen and show me where
7 this designated profile is in Exhibit 1048?

8 MR. HA: Alex, I have a suggestion so that we
9 are not getting conflicting sort of illustrations based
10 on different portions of the testimony.

11 Why don't we have Dr. Tsai generate a new
12 figure for your line of redirect so I can use that
13 exhibit for my portions of the testimony.

14 MR. CHAN: Now, he testified that there's some
15 confusion to this, so instead of him crossing it out, he
16 can write next to it so that -- it seems to me that it's
17 not what is reflected, at least to his understanding, so
18 that's why I'm using a different color pen to
19 illustrate.

20 MR. HA: But we -- okay. That's fine.

21 BY MR. CHAN:

22 Q. Dr. Tsai, can you --

23 MR. HA: Actually, I didn't say that's fine.
24 I said to go ahead, because --

25 MR. CHAN: I'm sorry.

1 MR. HA: You were saying something, and I cut
2 you off.

3 MR. CHAN: What I was saying is, if Dr. Tsai
4 can point to me, or at least tell me which line is the
5 designated profile, as reflected in Claim 1, and you can
6 write that using the red pen.

7 MR. HA: Well, Alex, I'm going to restate my
8 objection. I want to be able to review the record to
9 see exactly what you said and whether you're
10 mischaracterizing his testimony, and whether this is
11 coaching that's happening, and you are revising the
12 exhibit that he generated based on my questions. That
13 seems highly prejudicial to me.

14 MR. CHAN: I would disagree.

15 Q. But just for the sake of clarity, here's a new
16 piece of paper for you, Dr. Tsai.

17 You can try to mimic what you have in 1048 and
18 draw this exact same figure.

19 Now, stop there. Use the red pen and show me
20 where the designated profile that you believe
21 corresponds to the designated profile in Dr. Sung's
22 Claim 1.

23 Can you write "Designated profile" on it so we
24 know what it is. Or you can put "DP."

25 Why did you draw a red line that's labeled as

1 "DP" that way?

2 A. Because that is the highest point.

3 Q. Where do you get from the -- strike that.

4 So with that as the DP, now, can you tell me,
5 using, maybe, a different color of pen -- let's say blue
6 color -- can you draw me the baseline that you
7 referenced in Exhibit 1004.

8 Can you put -- maybe label it as "Exhibit
9 1004" so we know exactly what this is referencing.

10 Thank you.

11 So looking at what you have labeled as Exhibit
12 1004, can that line correspond to the designated profile
13 described in Claim 1 of the '802 patent?

14 A. No.

15 Q. Going back to 1048 -- referring to Exhibit
16 1048, is Exhibit 1048 the same or different than the one
17 you have just drawn up?

18 MR. HA: Objection. Form. Strike that.

19 Let me mark this exhibit that you have just
20 drawn as Exhibit --

21 Actually, it should be your exhibit, right so
22 you should mark it using your exhibit?

23 (Tsai Deposition Exhibit 2013 was marked for
24 identification and is attached to the transcript.)

25 BY MR. CHAN:

1 Q. So I think it's very important that you
2 clarify your testimony for the sake of the record and
3 for the sake of clarity.

4 You have two exhibits in front of you, Exhibit
5 2013 and Exhibit 1048.

6 Can you please now confirm for me which one is
7 accurate in terms of how you understand the designated
8 profile?

9 A. That one.

10 Q. Which one is this? Which number?

11 A. 2013.

12 Q. Okay. Can you now tell me what the difference
13 is between your line drawn in blue versus the red line
14 that is designated as "Designated profile" in the '802?
15 Can you tell me the difference between those two lines?

16 A. Okay. Regarding this red line DP, usually, we
17 use that to define the highest point as a starting, and
18 then downwards to find out the number of working
19 particles.

20 Regarding this baseline right here, because of
21 this fact, it is not so leveled, not so flat, therefore,
22 if you want to use that line to define the number of
23 working particles, it's rather very difficult, it won't
24 be very clear to do so. So, usually, we will not use
25 that line to do so.

1 THE CHECK INTERPRETER: Check rendition:
2 "Regarding the baseline right here, because this is not
3 so leveled, not so flat, so therefore, if you want to
4 use that line to define the number of working particles,
5 it's rather difficult and it won't be very accurate to
6 do so. So, usually, we do not use that line to do so."

7 THE WITNESS: So if you want to define the
8 number of working particles, you use the highest point
9 to do that. That would be the most direct and the most
10 effective.

11 BY MR. CHAN:

12 Q. So why did you measure -- strike that.

13 In providing your testimony with respect to
14 your experiment, why did you testify that you would
15 measure the diamond height from the blue line?

16 MR. HA: Objection. Mischaracterizes the
17 record.

18 THE WITNESS: Because regarding ODD, it uses
19 the reverse technology. After you reverse it, then this
20 surface would be very leveled and flat. Therefore, that
21 we can use that leveled line as the baseline.

22 THE CHECK INTERPRETER: "Because we use ODD,
23 which uses reverse technology. After you reverse it,
24 then the surface will become very flat, and therefore,
25 you can use that leveled line as the baseline."

1 BY MR. CHAN:

2 Q. So how is the measurement of the heights
3 different when someone uses the blue line as opposed to
4 the red line?

5 You can use the orange pen to illustrate the
6 difference.

7 A. Assuming that is 150 micron --

8 MR. CHAN: Let the record reflect that
9 Dr. Tsai wrote "150 micron" in Exhibit 2013.

10 THE WITNESS: If that one assumed it is 140
11 micron, then from the highest point to that point would
12 be 10 micron. From the top point looking down to the
13 second highest, the distance would be 10 micron in
14 between.

15 And if you look at the distance from the
16 bottom, from the blue line up, then that would be 140
17 micron. Therefore, they are different.

18 BY MR. CHAN:

19 Q. Do you recall, counsel for petitioner asked
20 you a number of questions regarding Exhibit 1049?

21 You can put that one away for now. Actually,
22 strike that.

23 If we go back to Exhibit 1047. And I'll also
24 hand you a blank piece of paper. If you can draw the
25 exact same thing as reflected in 1047.

1 Now, in Exhibit 1047 --

2 MR. HA: I'll just make a record that he did
3 not identically reproduce 1047 because the red lines and
4 the red text are missing.

5 MR. CHAN: Thank you, Counsel.

6 Q. So there is also the notation "Baseline 1" and
7 "Baseline 2." Can you also add those notations to the
8 drawings that you just made.

9 Thank you for at least trying to draw what we
10 see in 1047 to the best of your ability.

11 So now, earlier, you provided some testimony
12 about 1047. Again, you testified to two different
13 baselines, 1 and 2.

14 Can you confirm for me what baseline 1 is and
15 what baseline 2 is, as well?

16 A. Baseline 1 is the substrate, and baseline 2 is
17 the highest point of the diamond.

18 Q. For baseline 2, are you referring to the
19 designated profile in the '802 patents, or are you
20 referring to something entirely different?

21 A. That refers to designated profile.

22 Q. Designated profile for the '802 patents?

23 A. Yes.

24 Q. Can you write "'802 patents" on it so we know
25 what you're referring to.

1 And for baseline No. 1, is that in reference
2 to your experiment in Exhibit 1004?

3 A. (In English) Yes.

4 Q. Can you label it as "Baseline for Exhibit
5 1004," so we know what it is.

6 MR. CHAN: Okay, I'm going to have that marked
7 as Exhibit 1024.

8 (Tsai Deposition Exhibit 2014 was marked for
9 identification and is attached to the transcript.)

10 BY MR. CHAN:

11 Q. Now, you have both Exhibits 2014 and 1047 in
12 front of you.

13 Can you please clarify for the record which
14 one is the accurate reflection of what you believe to be
15 the designated profile for the '802 patents and Exhibit
16 1004?

17 A. This one here.

18 Q. Which exhibit?

19 A. Exhibit 2014.

20 Q. Thank you. You can give those two exhibits to
21 me or set those aside.

22 Earlier, counsel for petitioner spoke with you
23 about Exhibit 1049.

24 Do you have 1049 in front of you?

25 Can you go to Figure 3 of 1049, please.

1 Now, Figure 3 reflects what is known as the
2 ADD, correct?

3 A. (In English) Yes.

4 Q. Was a designated profile a design
5 consideration for ADD at the time of publishing this
6 paper in 2009?

7 MR. HA: Objection. Speculation.

8 THE WITNESS: Back in 2009, we did not
9 consider it.

10 BY MR. CHAN:

11 Q. Why not?

12 A. Back at that time, we hoped that they were
13 having the same heights.

14 Q. Could you achieve equal diamond heights
15 without using a designated profile?

16 A. Well, for this experiment, it was in the hope
17 not to use the designated profile, we still could reach
18 equal diamond heights.

19 Q. You testified earlier that the design for the
20 ADD failed.

21 Why did it fail?

22 A. Okay, first of all, it's a fabrication rather
23 cumbersome and complicated. And No. 2, the tips are
24 easily to be worn out, and therefore, the longevity is
25 not so long. Then we gave it up.

1 Q. To your understanding, was the ADD ever
2 commercialized?

3 A. No.

4 Q. Let me direct your attention to Exhibit 1004.

5 Do you have Exhibit 1004 in front of you?

6 You can turn to page 2 of Exhibit 1004.

7 Now, you were asked about whether the goal, as
8 reflected in Figure 2, was to improve the leveling of
9 diamond tips and to reduce CMP costs.

10 Do you remember those questions?

11 A. (In English) Yes.

12 Q. Okay. Now, Figure 2 reflects the ODD,
13 correct?

14 A. (In English) Yes.

15 Q. Was the designated profile a design
16 consideration for ODD at the time of publishing this
17 paper?

18 MR. HA: Objection. Speculation.

19 THE WITNESS: We did not consider about it.

20 BY MR. CHAN:

21 Q. Why not?

22 A. Because we hoped to reach the equal heights,
23 and we utilized the reverse casting method and we were
24 able to achieve a very flat plate. Therefore, that we
25 could use that as the baseline to measure the diamonds.

1 Q. So were you able to improve the level of
2 diamond tips without using the designated profile as a
3 design consideration?

4 A. Not easy.

5 Q. You testified earlier that the design for ODD
6 failed.

7 Why did it fail?

8 A. Because the diamonds were easy to fall off.

9 Q. Was ODD ever commercialized?

10 A. No.

11 Q. So you just talked about the diamonds falling
12 off easily. So maybe I'll hand you a piece of paper.
13 Looking at Figure 2, I want to understand how you
14 manufactured the ODD, as reflected in Figure 2.

15 You're familiar with the process, correct, in
16 the context of manufacturing?

17 A. Yes.

18 Q. What I want to know is I want to see a
19 step-by-step analysis of how you create the mold, as
20 well as adding the nickel layer, as well as epoxy in
21 this reverse casting method.

22 So can you draw that for me. You can use any
23 color pen.

24 A. First of all, we would take a plate. This top
25 layer is something like adhesive agent, something like a

1 glue. Things can stick on it.

2 We take a mesh with holes. We will put a lot
3 of diamonds on and we shake this mesh. Then diamonds
4 will fall in through the hole.

5 Then we remove the mesh. Then we take another
6 plate to press it down. Because the bottom plate is
7 very hard, so the diamonds will stay on top of that.
8 Because the bottom plate is very hard and it's rigid
9 material, so the diamonds will stay on the plate.

10 Q. When you say "bottom plate," are you referring
11 to the substrate labeled as No. 1?

12 A. Next, I will reverse, flip it over.

13 Q. Which one is the substrate, or plates? Strike
14 that.

15 I see the No. 1 label.

16 Okay, please continue.

17 Can you use a different color to reflect the
18 epoxy.

19 A. Then we use something like a -- similar to
20 epoxy to keep them.

21 MR. CHAN: Let the record reflect that the
22 blue color corresponds to epoxy.

23 THE WITNESS: The eighth step is to reverse
24 it.

25 MR. CHAN: I think he means flipping it.

1 THE WITNESS: To flip it.

2 Then we will remove No. 1 plate and the
3 adhesive. Then the tips of diamonds are leveled.

4 BY MR. CHAN:

5 Q. Is the reason why the diamonds are leveled
6 because of No. 2 in step 7 where the diamonds are laying
7 in 2 on top of 1?

8 A. That's correct.

9 Q. Okay. So using what you have drawn -- well,
10 first, who came up with this process?

11 A. This process was coming from our own lab.

12 Q. What steps did you take to come up with this
13 process?

14 A. We did a lot of experiments. Then we
15 developed this process.

16 Q. Now, looking at step No. 8, using a different
17 color of pen -- you can use red, if you like -- draw me
18 how you -- where you measure the diamond heights.

19 A. That's the baseline.

20 Q. And how would you measure the height of the
21 diamond using that baseline?

22 Use a different color, if you like.

23 A. Assuming the height of this diamond tip is 15
24 micron --

25 Q. Just to confirm, are you measuring the height

1 of the diamond from the substrate labeled as "Baseline"
2 to the tip of the diamond?

3 A. That's right. Measured upwards.

4 Q. Now, your paper, which counsel for petitioner
5 mentioned earlier, says, and I will phrase -- strike
6 that.

7 Earlier, counsel for petitioner directed your
8 attention to column 8 of Exhibit 1004. Strike that.

9 No, I'm referring to Exhibit 1050.

10 So let me direct your attention to column 8,
11 line 22.

12 Counsel for petitioner mentioned the phrase
13 "the diamond tips are already leveled."

14 Do you see that?

15 This is at line 24.

16 Do you see that?

17 A. (In English) Yes.

18 Q. Now, looking at the -- strike that.

19 MR. CHAN: Let me have that exhibit -- let's
20 mark this as Exhibit 2015.

21 (Tsai Deposition Exhibit 2015 was marked for
22 identification and is attached to the transcript.)

23 BY MR. CHAN:

24 Q. Looking at Exhibit 2015, can you tell me why
25 the diamond tips are already leveled?

1 A. Because we used a very flat plate as the base.
2 So you put it on and then you flip it over. They were
3 leveled.

4 Q. Now, in the preceding sentence, it says: "The
5 diamond tips of the ODD can be leveled to less than 15
6 micron."

7 So if all the diamonds, as reflected in 2015,
8 have identical heights, why would there still be a
9 variation of 15 micron?

10 A. Let me explain it. First of all, diamonds
11 have a different sizes -- the bigger one, the smaller
12 one. And those tips, assuming they are all pointing
13 upwards, then assuming there's a 30-micron height there,
14 but some of them may tend to tilt or even lie down.
15 Then you will have the difference now.

16 And in addition, as I said, diamonds -- they
17 tend to have bigger ones and smaller ones. It's, of
18 course, very difficult to select the identical sizes of
19 the diamonds. For that, it would cause some
20 differences.

21 And also, we use this labeled No. 2, this
22 adhesive agent. It may have some tolerance of the
23 height. In the engineering, when we do the
24 manufacturing -- I'm sorry, when we do the fabrication,
25 it also would cause some tolerance. For the

1 conventional diamond disk, if you don't do the flipping
2 or the reverse, then, on a substrate, the diamonds on
3 the top of that may have variation in the heights. You
4 have some higher, some lower.

5 Q. So when you say "15 micron," in this paper,
6 you're referring to the tolerance?

7 A. Here, the way to do the measurement is that I
8 use a substrate as a baseline and I will then measure
9 maybe 100 points or 200 points. Then I will obtain a
10 lot of data. Then I use the statistics to find the
11 average protrusion height, as well as the error bar.
12 Therefore, 15 micron is an average.

13 Q. So you're pointing to Figure 6 just now when
14 we talked about the error bar.

15 So to make sure I understand, looking at
16 Figure 6, the baseline seems to correspond to 40,
17 labeled as "Diamond Height Variation."

18 Do you see that?

19 MR. HA: Objection. I forgot to say. This is
20 beyond the scope of the cross that I made.

21 I never talked about Figure 6 anywhere in my
22 cross, Alex.

23 MR. CHAN: He mentioned the error bars and he
24 did actually talk about the error bar in Figure 6, so
25 this is relevant to that. But that's as far as I want

1 to go.

2 BY MR. CHAN:

3 Q. So what do you mean when you say "error bar in
4 Figure 6"?

5 And I'm only speaking in the context of the
6 ODD.

7 A. Like I said, I use a substrate as a baseline,
8 and I then have a variation of the tip heights. I
9 record -- measure and record how many points, then use
10 the statistics approach to calculate the average value
11 of those. Then I obtain that 15 micron.

12 Q. When you say "value," you're talking about
13 from the substrate to the diamond tip?

14 A. Yes.

15 Q. Then you take all the data points and average
16 them to come up with the error bar?

17 A. Use the statistics to obtain error bar.

18 Q. So the error bar seems to point to 15 to 35,
19 roughly.

20 What does that mean?

21 A. Error bar is the differences of the heights.

22 THE CHECK INTERPRETER: Check rendition:

23 "Error bar refers to the tolerance of the differences of
24 the heights."

25 MR. HA: I'm going to object to all of these

1 questions and testimony regarding Figure 6 as beyond the
2 scope of my cross. But please continue.

3 THE WITNESS: Well, to give an example, if I
4 have three particles -- one is 10 micron, one is 20, one
5 is 30 -- I take the average, which would be 20. So 20
6 is the average. Then 10 -- between 10 and 20, you have
7 a 10-micron difference. And also, between the other
8 one, you have a 10-micron difference there.

9 Simply put, 15 micron is error bar.

10 BY MR. CHAN:

11 Q. Counsel for petitioner went through column 2,
12 lines 14 and 15 with you. This is on page 1 of Exhibit
13 1004.

14 Now, you recall you were asked a number of
15 questions about the number or percentage of diamond
16 grits? Do you remember that?

17 A. (In English) Yes.

18 Q. Was the focus of this paper on knowing the
19 percentage of diamond grits used for cutting?

20 A. This paper is mainly not focusing on that.

21 Q. Did you perform any measurement to determine
22 the number of diamond grits in relation to this research
23 reflected in Exhibit 1004?

24 A. No.

25 Q. Let me ask it this way.

1 Would the percentage of diamond grits that are
2 cutters have any bearing or relevance to your research
3 in this paper?

4 A. No, this is not the key point that I care
5 about.

6 Q. Counsel for petitioner asked you about what a
7 POSITA would think in connection with this phrase, so
8 let me ask you a question.

9 What would a POSITA do to determine the number
10 of diamond grits?

11 MR. HA: Objection. Vague.

12 THE WITNESS: If a professional POSITA -- this
13 person will know that this is only an introduction, the
14 way to write an introduction is like this. They just
15 would read it. They would not treat that as a key
16 point.

17 BY MR. CHAN:

18 Q. Why not?

19 A. Because that's a generally recognized way of
20 doing so. Nobody could actually identify the actual
21 number of working particles. That means nobody can
22 quantify that.

23 Q. Would a POSITA recognize that the number of
24 cutters would change depending on the number of diamond
25 grits?

1 A. It's quite difficult.

2 Q. Why difficult?

3 A. Because it would take a lot of experience and
4 measurements in order to get the precise value.

5 Q. Now, you have the word "typical" here.
6 Does the word "typical" mean every time or
7 every disk?

8 A. That "typical" was used to give it a very
9 broad definition of BDD because there are various types
10 of BDD.

11 Q. Now, you testified -- strike that.

12 Counsel for petitioner asked you again about
13 diamond grits, and I think you mentioned the phrase
14 "common sense."

15 I'm not sure what that means in relation to
16 this figure, so can you clarify for me that when you are
17 referring to the phrase "common sense," are you
18 referring to common sense as being that a POSITA would
19 need to measure the diamonds to determine the percentage
20 of diamond grits, or a POSITA would need to recognize --
21 would recognize that every disk would contain more than
22 10,000 grits?

23 MR. HA: Objection. Leading. Vague. Form.
24 Compound.

25 MR. CHAN: Let me ask a better question.

1 Strike that.

2 Q. When you said the phrase "common sense," are
3 you referring to common sense as being that a POSITA
4 would need to measure the diamonds to determine the
5 percentage of diamond grits, or that every disk would
6 contain less than or over 10,000 grits?

7 MR. HA: Same objections.

8 THE WITNESS: A POSITA generally would know
9 this is just a general description. In order to know
10 the actual detail quantity or to quantify that, we need
11 to do many, many experiments in order to also know how
12 many diamond grits. Then we need to do a lot of
13 measurements in order to define the number of working
14 particles. Then we can get the answer.

15 So if a POSITA just look at these information,
16 then they say they already know the answer. Then I
17 don't think this person is qualified to be a POSITA.

18 THE CHECK INTERPRETER: The witness also said
19 that "for a true POSITA, he or she will definitely know
20 that a lot of experiments would be required in order to
21 arrive at a value."

22 BY MR. CHAN:

23 Q. So since this is in reference to diamond
24 cutters, if the tallest tip is a cutter and it falls
25 off, would you have to redo the experiment then?

1 MR. HA: I'll object to the hypothetical.

2 THE WITNESS: If it falls off, it will affect
3 the quality of the wafer.

4 BY MR. CHAN:

5 Q. So would you have to remeasure that entire
6 disk again?

7 A. Yes. If it's a very stringent experiment,
8 then you need to remeasure.

9 Q. Now, on this paper I see two names as authors,
10 on the first page, Mr. P.H. Lee and Mr. J.C. Sung.

11 Do you see those two names?

12 A. Yes.

13 Q. And earlier today, counsel for petitioner
14 asked you about these names.

15 And is J.C. Sung in reference to Dr. Sung?

16 A. Yes.

17 Q. What was his contribution to this paper?

18 A. Well, his contribution was when I worked with
19 Kinik, he provided some ODD concepts.

20 Q. Did you speak with or collaborate with
21 Dr. Sung on this paper?

22 A. Generally, Kinik only provided the diamond
23 disk to us. All of those experiments were done by me
24 and my students.

25 Q. So did you speak with or collaborate with

1 Dr. Sung on this paper?

2 A. No.

3 Q. Now, there's another Exhibit 1049, which we
4 talked about earlier.

5 Let me ask you the same thing.

6 Is Dr. Sung one of the co-authors on this
7 paper?

8 A. Yes.

9 Q. He's the primary author of this paper,
10 correct?

11 A. Yes.

12 Q. What was Dr. Sung's contribution to this
13 paper? Actually, strike that.

14 Did you speak with or collaborate with
15 Dr. Sung on this paper?

16 A. It's the same when I worked with Kinik.
17 Dr. Sung provided such concepts.

18 Q. So did you speak with him or collaborate with
19 him on this paper?

20 A. No.

21 Q. Going back to Exhibit 1004, let me direct your
22 attention to Figure 5. This is on page 4 of Exhibit
23 1004.

24 Now, counsel for petitioner asked you a number
25 of questions about this figure. Specifically, he also

1 pointed you to column 8, lines 10 and 11, which reads
2 "Figure 5 shows the cutter images of the BDD and ODD
3 protrude using a stylus-type 2D surface roughness
4 instrument."

5 Do you see that?

6 A. Yes.

7 Q. Did you use the stylus-type 2D surface
8 roughness instrument in coming up with the data
9 reflected in Figure 5B for the ODD?

10 A. Yes.

11 Q. Okay. Does that instrument measure spacing
12 between diamonds?

13 A. No. It measures the diamond protrusion
14 height.

15 Q. So it does or does not measure the space
16 between diamonds?

17 A. It was mainly measuring the diamond heights,
18 but I also did a scanning of the plane. Therefore, from
19 that, I can also tell the space between diamonds.

20 Q. Did you use the stylus on every diamond of the
21 ODD?

22 A. No.

23 Q. Would Figure 5B be reflective of the spacing
24 for all the diamonds in the ODD?

25 A. We measured quite a lot of small squares or

1 boxes, but for the purpose of publishing paper and for
2 the purpose for the promotion, we located the best
3 quality pictures and put in there.

4 Q. Now, going back to Exhibit 2015.

5 That is for ODD, is that correct?

6 A. Yes.

7 Q. Can you put the word "ODD" on Exhibit 2015 for
8 me, please.

9 Now, you talked about a mesh with counsel for
10 petitioner.

11 Is that mesh reflected under step 3 of Exhibit
12 2015?

13 You can just put "Mesh" next to it. Okay.

14 So can you explain to me how you used the mesh
15 to ensure that the diamonds would fall into the mesh and
16 then through the mesh and onto the glue right below?

17 You can just explain it.

18 A. We will put on a lot of diamonds on the mesh.
19 Then we just shake it back and forth, and then during
20 this movement, the diamonds will fall down to the glue.

21 Q. So when diamonds fall through the mesh, are
22 the spacings between the diamonds -- strike that. I'll
23 ask a better question.

24 So I saw that you were sort of gesturing with
25 your hands in a swiping-shaking way.

1 Do you do this manually, or do you use a
2 machine?

3 A. The professional way, of course, is to use a
4 machine, but for us, we are doing this in the lab, so we
5 do that manually.

6 Q. So when counsel for petitioner asked you about
7 the spacing in Figure 5, is the spacing between the
8 diamonds, as reflected in Figure 5B for the ODD, the
9 same across the entire disk?

10 A. Well, just like I said, in order to publish
11 this paper, we measured quite a lot of small boxes on
12 the disk, and then we selected the best one and put onto
13 the paper.

14 However, of course, one small area cannot
15 represent the entire disk.

16 Q. Can you draw me a mesh. Here, I'll give you a
17 blank piece of paper.

18 MR. HA: I want to make an observation for the
19 record that Exhibit 1051 was already drawn as being
20 representative of the mesh, and to the extent that
21 Dr. Tsai now changes his testimony, we will move to
22 strike it.

23 THE WITNESS: This is a mesh. Something like
24 this. This is similar as a mesh.

25 MR. CHAN: Let me just mark that exhibit, if I

1 have more questions for you.

2 (Tsai Deposition Exhibit 2016 was marked for
3 identification and is attached to the transcript.)

4 BY MR. CHAN:

5 Q. Now, looking at Exhibit 2016 and the one you
6 drew earlier, 1051, can you explain to me how they are
7 different or the same?

8 A. Well, actually, my intention of drawing these
9 two, I intend to draw the same as a mesh, but the
10 previous one, I was using the idea of having the
11 diamonds or diamond shapes as the place to draw those,
12 whereas here, I also draw a mesh, but actually they are
13 the same mesh.

14 Q. So let's just make it clear, because, in
15 Exhibit 1051, I see circles, whereas in Exhibit 2016, I
16 see squares.

17 So can you show me how they are the same?

18 A. Well, that previous one, Exhibit 1051, are
19 intended to use the diamond shapes, try to illustrate a
20 mesh. Where this one, Exhibit 2016, I draw like this.
21 That would be more towards an actual measure.

22 THE CHECK INTERPRETER: The last sentence:
23 "That's what a mesh actually looks like."

24 BY MR. CHAN:

25 Q. Now, going back to 1051, where you drew a

1 bunch of circles, is the spacing between those circles
2 the same across the entire mesh?

3 MR. HA: Objection. Asked and answered.

4 THE WITNESS: (In English) No.

5 MR. HA: To the extent that counsel's
6 questions associated with 2016 are complete, we reserve
7 our right to strike the entire testimony associated with
8 that exhibit.

9 THE WITNESS: No, the spacings are not the
10 same.

11 BY MR. CHAN:

12 Q. Why not?

13 A. Because when you do the manufacturing, you
14 tend to have the tolerances.

15 Q. So let me just visualize this in relation to
16 Exhibit 2015.

17 So you have holes and you have different
18 diamond sizes falling through the holes in the mesh, and
19 all the diamonds have different sizes, is that correct?

20 A. Yes.

21 Q. So even using the mesh that you drew up in
22 Exhibit 1051 as an example, when diamonds of different
23 sizes fall through the holes, do they fall exactly and
24 land at the same place across the entire disk?

25 A. Because, as I said, we shake the mesh a little

1 bit. Therefore, when we shake it, they may not drop at
2 exactly the same place.

3 Q. So would the spacing between the diamonds, as
4 reflected in Figure 5, be the same or different, all the
5 diamonds?

6 A. They would be different.

7 Q. Why?

8 A. When we make a global diamond disk, like I
9 said, we use the mesh. When we make a mesh, mesh itself
10 has a tolerance, and the diamond sizes, like I said,
11 they are different.

12 Also, we shake the mesh a little bit.
13 Therefore, based on these factors, the diamond would not
14 fall exactly through the centerline down.

15 Q. In referencing Exhibit 51, that's also the
16 same for that mesh, correct?

17 A. (In English) Yes.

18 Q. Now, earlier, counsel for petitioner asked you
19 some questions about priority dates.

20 Do you remember that?

21 A. Yes.

22 Q. Were you informed by counsel about what a
23 priority date is, without disclosing attorney-client
24 privileged information?

25 MR. HA: Objection. Vague.

1 Are you talking about me when you say
2 "counsel," or are you talking about yourself?

3 MR. CHAN: Let me strike that and ask the
4 question, re-ask the question.

5 Q. Were you informed about what a priority date
6 is by your counsel?

7 MR. HA: I'll caution opposing counsel that by
8 asking this question, you're opening the door to your
9 attorney-client privileged information, and I may seek
10 testimony, if you continue along.

11 BY MR. CHAN:

12 Q. I only need a "yes" or "no."

13 A. (In English) No -- yes.

14 Q. What does Dr. Sung need to do to trace his
15 '802 invention back to Dr. Sung's prior applications?

16 A. '802 had already described about the prior
17 claims. And also, it describes some new things, as
18 well.

19 THE CHECK INTERPRETER: "'802 has to have a
20 statement about the prior portion, and also, there must
21 be something new in '802."

22 THE WITNESS: For example, if '802 patent has
23 Claims A, B, C and D, and the prior publications had
24 Claims A, B, and C, then he can trace this back to
25 there, but this extra D will show the new things.

1 BY MR. CHAN:

2 Q. Does knowing the law impact your opinion, as a
3 POSITA, as to whether Dr. Sung's invention in '802 is
4 supported by his prior applications?

5 A. Because I am not familiar with the patent law,
6 I just had a very general idea about that. So I would
7 say that I don't know.

8 Q. Can you go to the '802 patents. Let's go to
9 Claim 1.

10 Is Claim 1 an independent claim?

11 A. (In English) Yes.

12 Q. Is Claim 2 an independent claim or dependent
13 claim?

14 A. It is a dependent claim.

15 Q. Have you read through these claims in
16 rendering your opinion in your declaration?

17 A. (In English) Yes.

18 Q. In preparing your declaration, did you review
19 and edit your declaration?

20 A. Regarding all of my declarations, as I said, I
21 had a lot of online meetings with my lawyer, and the
22 lawyers also asked me about quite a lot of questions,
23 questions regarding my professional knowledge. And I
24 also said that I am not familiar with the law. So based
25 on these collectively, we completed the declaration.

1 Q. Going to 56 -- strike that.

2 Going to paragraph 56 of your declaration,
3 counsel for petitioner sort of went through Claim
4 Limitations 1E and 1F of the '802 application with you.

5 A. Yes.

6 Q. Now, let me direct your attention to paragraph
7 58 first, which is directed to Claim Limitation 1E.

8 Do you see that?

9 A. Yes.

10 Q. When he says, "The difference in protrusion
11 distance being between the highest protruding tip and
12 the second highest protruding tip, which is less than or
13 equal to 50 micron" -- do you see that?

14 A. Yes.

15 Q. Now, right below, in 58, you mentioned two
16 different paragraphs, correct?

17 A. (In English) Yes.

18 Q. The first one says "The tips vary from the
19 designated profile."

20 Do you see that?

21 A. Yes.

22 Q. Counsel for petitioner asked you about how
23 this is supporting the Claim Limitation 1E, right?

24 A. Yes.

25 Q. In your testimony, you were gesturing, and so

1 instead of you gesturing, I'm going to give you a piece
2 of paper. Can you draw for me how paragraph -- strike
3 that -- how the two paragraphs in paragraph 50 of your
4 declaration support 1E of the '802 patents.

5 Use any color pen. If you want, you can start
6 drawing by the designated profile, since counsel for
7 petitioner seems to focus on that.

8 MR. HA: Objection. Leading. Coaching, in
9 fact.

10 THE WITNESS: It's obvious for '817, the range
11 is from 1 micron to 150 micron, so 50 micron is in this
12 range.

13 BY MR. CHAN:

14 Q. So let me make sure I understand. I'm looking
15 at paragraph 58.

16 This is in relation to Sung '817, which says:
17 "The tips vary from the designated profile."

18 Where is the designated profile?

19 MR. CHAN: Before you mark any further, I'm
20 going to mark this exhibit as 2017.

21 (Tsai Deposition Exhibit 2017 was marked for
22 identification and is attached to the transcript.)

23 BY MR. CHAN:

24 Q. So where is the designated profile?

25 A. This.

1 MR. CHAN: Let the record reflect that you are
2 drawing a red line.

3 Q. So here, it says "The tips vary from the
4 designated profile," and counsel for petitioner asked
5 you, where does this say the highest and second highest
6 protruding tip?

7 Do you remember that?

8 A. (In English) Yes.

9 Q. Where is the highest tip?

10 Can you draw that for me in Exhibit 2017.

11 MR. CHAN: Let the report reflect that you are
12 writing the word "Highest tip" in orange.

13 Q. Okay. And where is the second highest
14 protruding tip in Exhibit 2017?

15 Where does this say in paragraph -- strike
16 that.

17 Where does the phrase "The tips vary from the
18 designated profile" say anything about the highest or
19 the second highest tip?

20 A. It says "their tips." That means all tip
21 heights on this diamond disk.

22 Q. Why do you believe that "their tips" refers to
23 all tip heights?

24 A. Because for a diamond disk, you will place
25 either 10,000 or maybe 20,000 diamond particles on that,

1 and you want to do the dressing pad. Therefore, that
2 you need to measure all those tip heights.

3 Q. Have you ever controlled the tip heights for
4 only some diamonds and not for all diamonds?

5 MR. HA: Objection. Beyond the scope.

6 THE WITNESS: It is meaningless because all
7 diamond particles contacts the pad to work.

8 BY MR. CHAN:

9 Q. So would a POSITA view the phrase "the tips"
10 as referring to all tips? Or is it just your opinion
11 that "the tips" refers to all tips?

12 A. Well, if this person is a diamond disk expert,
13 then this person would know that when he sees the word
14 "the tips," that would refer to all tips. And because
15 if you want to do the conditioning to a pad, you are
16 doing to all diamond particles on the CMP dresser.

17 Q. Let me direct your attention to paragraph 65
18 of your declaration. This is in connection with Claim
19 Limitation 1F.

20 I'm going to grab Exhibit 2017 from you. You
21 can just set that aside.

22 For Claim Limitation 1F, in relation to Sung
23 '817, can you also draw for me how '817 supports or
24 discloses Limitation 1F?

25 A. The range here says from zero to 100 micron,

1 so this is the range.

2 From this top, from this tip, go down 80
3 micron and covering all these tips, these are all the
4 working particles, because they are within the 100
5 micron. Therefore, that these are all the working
6 particles.

7 THE CHECK INTERPRETER: The witness also said
8 that "this is just a schematic illustration."

9 MR. CHAN: Let me just mark that exhibit as
10 2018.

11 (Tsai Deposition Exhibit 2018 was marked for
12 identification and is attached to the transcript.)

13 BY MR. CHAN:

14 Q. And also, put "Limitation 1F" for labeling
15 purposes, as well as "'817 patent" anywhere within
16 Exhibit 2018. Just put "1F."

17 And "'817 patent application," so we know it's
18 the '817 application.

19 Now, looking at Exhibit 2018, can you point to
20 me which line is the designated profile line?

21 Can you maybe use the green color pen to point
22 to it for me.

23 So can you explain to me how Sung '817, as
24 described in paragraph 65 of your declaration, discloses
25 the highest 1 percent of the tips that are within about

1 80 micron or less?

2 A. First of all, we need to know the number of
3 all diamonds. Then we need to do some measurements to
4 know all the heights of them, and then we selected
5 highest protrusion tip as a designated profile. Then
6 for all those diamonds, we will select 1 percent of them
7 as the working particles, and these working particles
8 should be equal or less than 80 micron from the profile.
9 Therefore, it is included in 100 micron stated in the
10 '817.

11 Q. Okay. So where in '817 does it say the
12 highest 1 percent of the tips, from the perspective of a
13 POSITA?

14 A. Usually, we will look at all tips. So their
15 tips stated in there refers to all tips. So a true
16 POSITA person will know the number of all tips and then
17 do the measurement of all heights in order to determine
18 the percentage of working particles, then to determine
19 the number of working particles.

20 Q. So is it your opinion that all tips include
21 the highest 1 percent of protruding tips?

22 A. What I'm saying is that if it represents all
23 tips, then, of course, it would also include the highest
24 protruding tip and the second highest protruding tip.

25 Q. Can you show me where, in Exhibit 2018, it

1 reflects the difference in protrusion that is within or
2 about 80 micron or less?

3 Can you use a different color pen. Maybe
4 pink.

5 Let the record reflect that you drew "80
6 micron" in black.

7 Now, you also opined on Sung '786 with respect
8 to Claim Limitations 1E and 1F.

9 Do you remember that?

10 A. Yes.

11 Q. Now, would your testimony change with respect
12 to '786 -- strike that.

13 You already testified to Exhibits 2018 and
14 2017 with respect to Sung '817.

15 Would your testimony change with respect to
16 Sung '786 with respect to what you have drawn?

17 A. No.

18 Q. Let me direct your attention to paragraph 70
19 of your declaration. Here, you opine that '786
20 discloses certain particles that are arranged with their
21 tips varying from a designated profile.

22 So looking at their tips, would your testimony
23 about the tips being all tips also apply here?

24 A. Yes.

25 Q. Earlier, you drew Exhibit 2017.

1 Remember that? Remember, you drew Exhibit
2 2017 in connection with Limitation 1E for '817, correct?

3 A. Yes.

4 Q. Does that also apply to Sung '786?

5 A. Yes.

6 Q. Okay. Now, going back to Exhibit 2018, at the
7 same time, I want to draw your attention to paragraph 76
8 of your declaration.

9 MR. HA: This is going beyond the scope. I
10 did not question Dr. Tsai about anything about 76.

11 BY MR. CHAN:

12 Q. Would your testimony with respect to 2017 also
13 apply to Sung '786?

14 A. Yes.

15 Q. You can set that aside. I have only a couple
16 of questions left.

17 MR. HA: Let me just make a standing
18 objection. All of these exhibits that you are
19 generating -- and I will not put my objections on 2013
20 and 2014 -- but all these new exhibits that you are
21 generating, from 2015 through 2018, it's a clear attempt
22 to violate the rule of submission of new evidence in the
23 surreply, and to the extent that patent owner relies on
24 any of these exhibits in the surreply, we reserve the
25 right to strike all of these.

1 MR. CHAN: We obviously will disagree with
2 your objection, but you may proceed. Actually, there's
3 no pending question. Let me ask the question.

4 Q. Do you recall that counsel for petitioner
5 asked you about their petition? Do you have the
6 petition in front of you?

7 A. Yes.

8 Q. Were you informed about the arguments in
9 Samsung's petition in rendering your opinion in your
10 '802 declaration?

11 A. No.

12 Q. Let me just ask the question again.
13 Were you informed about the arguments in
14 Samsung's petition?

15 MR. HA: Objection. Asked and answered.

16 THE WITNESS: A portion of it.

17 BY MR. CHAN:

18 Q. So why did you say "No"?

19 A. Sorry, I'm very tired. I am not able to
20 reasonably do my thinking.

21 Q. Thank you. I appreciate the answer. I'll
22 make this rather quick.

23 Does your answer also apply -- strike that.

24 Does your answer about having reviewed at
25 least a portion of this petition also apply to petitions

1 in other IPRs, including 534 and 533?

2 MR. HA: Objection. Beyond the scope of
3 today's deposition.

4 THE WITNESS: (In English) Yes.

5 BY MR. CHAN:

6 Q. Earlier, counsel for petitioner asked you some
7 legal procedures about patent law.

8 Do you remember that?

9 A. Yes.

10 Q. Would knowing those procedures impact your
11 opinion or what you believe to be the view of a POSITA?

12 A. Here, I can clearly indicate that if we are
13 talking about my professional knowledge, then I think
14 that is accurate, if you're talking about my
15 professional knowledge.

16 Q. On Monday, counsel for petitioner asked you
17 about Figure 1 of the '802 patents.

18 Do you remember that?

19 MR. HA: Objection. Beyond the scope of
20 today's cross.

21 THE WITNESS: Yes.

22 BY MR. CHAN:

23 Q. You testified that Figure 1 is not the only
24 points.

25 Can you clarify whether Figure 1 is or is not

1 the only points?

2 A. It is not the only key points.

3 Q. Finally, counsel for petitioner went through
4 Dr. Sung's declaration with you.

5 Do you remember that?

6 A. Yes.

7 Q. I believe that's Exhibit 11.

8 Does reading that declaration by Dr. Sung
9 change your opinion in your -- rendered in your '802
10 declaration?

11 A. If we are talking about my personal
12 professional knowledges, as well as my knowledge to
13 diamond disk, I think they are okay. They are accurate.

14 MR. CHAN: No further questions.

15 Pass the witness.

16

17 FURTHER EXAMINATION

18 BY MR. HA:

19 Q. Doctor, I know you're very tired and you have
20 a hard time thinking, and unfortunately, your counsel
21 went through a redirect with you that extended over two
22 hours. And because of some of these questions that your
23 counsel raised, I, unfortunately, have to keep you just
24 a little bit longer, so I apologize for that.

25 By agreement of the parties, I actually have

1 the same two hours, but I promise you, I will not go
2 that long.

3 So let's start with a very basic question.

4 Did you have any discussions with counsel
5 after my cross finished?

6 A. No.

7 Q. In your declaration, did you ever provide the
8 construction -- a proposed construction for the term
9 "designated profile"?

10 A. (In English) I don't remember.

11 Q. Well, can you flip through your declaration
12 and determine if you proposed a construction for the
13 term "designated profile," please.

14 A. Since in the Claim 1 of '802, it does mention
15 a term "a tip," so we can believe that the profile will
16 start from the tip.

17 Q. Do you know what it means to propose a Claim
18 construction a claim term?

19 A. Well, like I said, I don't have any legal
20 professional knowledge. Therefore, that I am not
21 familiar with the detail of the legal matters, and
22 because, Counsel, you kept asking me about these
23 questions. So I actually went ahead to check some
24 information to have a little bit better understanding.

25 THE CHECK INTERPRETER: The witness also said

1 in the beginning that "I provided my professional
2 knowledge."

3 MR. HA: By the way, do you need a break
4 before we continue, Dr. Tsai?

5 THE WITNESS: Okay, we would like to take a
6 break.

7 MR. HA: Okay. Can we take a ten-minute
8 break?

9 (A recess was taken from 7:40 p.m. to 7:51
10 p.m.)

11 BY MR. HA:

12 Q. Welcome back, Dr. Tsai.

13 Do you remember when counsel was talking to
14 you about Exhibits 1004 and 1049?

15 A. Yes.

16 Q. And counsel asked you what Dr. Sung's
17 contribution to these papers were.

18 Do you remember that?

19 A. Yes.

20 Q. And your answer was that, for Exhibit 1004,
21 Dr. Sung provided some ODD concepts.

22 Do you remember that?

23 MR. CHAN: Objection. Form.

24 BY MR. HA:

25 Q. I just want you to know that was a direct

1 quote from your answer.

2 A. Back at that time, I worked with Kinik, so a
3 number of people came up with some ideas and concepts.
4 Dr. Sung also provided some concepts.

5 Q. And you said the same thing about Exhibit
6 1049, right?

7 Dr. Sung provided such concepts.

8 Those were your answers, correct?

9 MR. CHAN: Objection. Form. Misstates
10 testimony.

11 MR. HA: Alex, how could it be a misstatement
12 of his testimony when I read word for word what he said?

13 MR. CHAN: It's a rough, and I don't know what
14 he said --

15 MR. HA: Understood.

16 THE WITNESS: Like I said, during those
17 meetings, a number of people came up with various
18 concepts, but somehow, Dr. Sung was a supervisor of
19 Kinik. Therefore, that eventually we will take his
20 concepts as the major ones.

21 BY MR. HA:

22 Q. You also testified, in offering these papers,
23 you never spoke with him or collaborated with him,
24 correct?

25 A. Well, for those experiments, we did those

1 experiments in our own lab. We edit and compile those
2 data from experiment by ourself. Then we wrote those
3 papers by ourself. We never discuss or spoke with him
4 about this.

5 THE CHECK INTERPRETER: "For these two papers,
6 the experiments were conducted by our own lab, and we
7 arranged the experiment data by ourselves, and also, we
8 drafted the papers on our own. We did not discuss them
9 with him."

10 BY MR. HA:

11 Q. So, Dr. Tsai, I'm going to make an
12 observation. I know your counsel asked you to provide
13 lengthy answers, but this is in very direct contrast to
14 the answers that you provided to counsel, and I'll
15 provide an example.

16 A question that your counsel asked: "So did
17 you speak with him or collaborate with him on this
18 paper?"

19 Answer: "No."

20 Now, I asked you exactly the same question,
21 and you're giving me a soliloquy about everything. So I
22 know we're all tired. If you can just answer honestly
23 and concisely, I would very much appreciate it.

24 MR. CHAN: Objection. Form. Argumentative.

25 BY MR. HA:

1 Q. With that, I'm just going to re-ask my
2 question.

3 You did not speak or collaborate with Dr. Sung
4 in either Exhibits 1004 or 1049, correct?

5 MR. CHAN: Objection. Form.

6 THE WITNESS: Well, like I said, Dr. Sung is a
7 supervisor of Kinik, and if you said that I -- did I
8 collaborate with him or not -- and actually, he was a
9 supervisor. Of course, we did have a chance to
10 collaborate with him and talking about -- spoke with him
11 or not -- actually, during the meetings we tend to have
12 the chance to speak to each other.

13 Regarding these two exhibits, I need to say
14 that we -- I did my own experiments in my own lab and I
15 made my own -- collected my own data and produced my own
16 paper.

17 So that if you want to ask me, did I speak
18 with him or not or collaborate with him or not, I cannot
19 say "yes" or "no."

20 If I say "no," then, probably, you will follow
21 up with another question. If I say "yes," then you will
22 ask with a different set of question.

23 THE CHECK INTERPRETER: May I retranslate the
24 question because previously "did not" was translated as
25 "never." So I don't know whether that was the reason,

1 but let me try to retranslate that question.

2 THE WITNESS: For these two published papers,
3 I did not.

4 BY MR. HA:

5 Q. Okay. So you personally don't have any
6 knowledge whether Dr. Sung thought about designated
7 profile in either of Exhibits 1004 and 1049, correct?

8 A. (In English) I don't know.

9 Q. Okay. I'm going to hand you Exhibit 2015.
10 Do you recall counsel asking you to generate
11 Exhibit 2015?

12 A. Yes.

13 Q. I just have very few specific questions.
14 Step No. 3, where you drew the mesh next to
15 the adhesive, approximately how close or far is the mesh
16 to the adhesive?

17 MR. CHAN: Objection. Form. Calls for
18 speculation.

19 THE WITNESS: It is determined by the sizes of
20 the diamonds that you are using.

21 THE CHECK INTERPRETER: "It depends on the
22 sizes of the diamonds that you are using."

23 BY MR. HA:

24 Q. I think you misunderstood my question.
25 What is the distance separation between the

1 top of the adhesive and the bottom of the mesh?

2 A. Generally, when we do the experiment we have
3 to make sure that the distance between the top of
4 adhesive layer and the bottom of this mesh should be
5 less than the size of the diamonds so that to ensure
6 when the diamond drops down, it will drop onto the
7 layer.

8 Q. Understood.

9 So these are very close to one another,
10 correct?

11 MR. CHAN: Objection. Form. Argumentative.

12 THE WITNESS: Therefore, we will use larger
13 sizes of diamonds.

14 BY MR. HA:

15 Q. Okay. How flat is the top surface of the
16 adhesive in step 3?

17 A. We did not do any precise measurement of it,
18 but we just roughly to make it to have a thickness.

19 THE CHECK INTERPRETER: "We did not make any
20 precise measurement of it. We would just say that it
21 has a certain thickness."

22 BY MR. HA:

23 Q. Would you say that the top surface of the
24 adhesive is flatter than the top surface of the plate
25 below it?

1 MR. CHAN: Objection. Form. Calling for
2 speculation.

3 THE WITNESS: Well, my major is mechanical
4 engineering, so my students -- they also have the
5 training of the master level. Therefore, that our
6 considerations will be that we have to make sure that
7 there is only one piece of diamond will fall through the
8 mesh and down there.

9 THE CHECK INTERPRETER: "Therefore, our
10 consideration" -- the second part. "Therefore, our
11 consideration is that if there's only one diamond that
12 will drop out of the mesh and that will be -- that's the
13 only one that drops off the mesh."

14 BY MR. HA:

15 Q. Don't worry about this. Withdrawn.

16 Let's actually start with step No. 2, okay?
17 Step No. 1, you have a top surface of the plate.

18 Step N 2, y u h a e a t p s u a c e the
19 adhesive, correct?

20 MR. CHAN: Objection. Form.

21 BY MR. HA:

22 Q. So which has the flatter top surface, the top
23 surface of plate 1 or the top surface of the adhesive?

24 MR. CHAN: Objection. Form. Calling for
25 speculation.

1 THE WITNESS: That is not the key point,
2 because when the diamond drops through the mesh holes
3 and we have to make sure that the bottom plate -- top
4 surface of the bottom plate should be very flat, and
5 that's because this adhesive layer tend to be very soft.

6 BY MR. HA:

7 Q. Okay. So I'll skip that, although you did not
8 answer my question, because I don't want to keep you too
9 long.

10 My next question is going to be, in step 6,
11 after you've pressed these diamond particles through the
12 adhesive, is the top surface of the adhesive flat or
13 rough?

14 MR. CHAN: Objection. Form. Calling for
15 speculation.

16 THE WITNESS: In general, we will use a type
17 of adhesive agent. It's called AB adhesive, and then we
18 would have to make sure there's a thickness of the layer
19 of the adhesive. So when pressing down, we have a
20 thickness there. Of course, this top surface of the
21 adhesive may not be entirely flat, but, in general, it
22 is in a flat mode.

23 And however, if you're talking about braze
24 type of way of making it, that would be under the high
25 temperature to bake it. Therefore, they tend to deform,

1 and that is like BDD. BDD is using 1,000 degrees C for
2 making the disk. So it tend to deform, where use in the
3 low temperature it would not deform.

4 BY MR. HA:

5 Q. So I was not asking about BDD, and if we
6 really want to get out quickly, please just focus on the
7 specific question that I ask you, Dr. Tsai.

8 A. Okay.

9 Q. This is the last time I'll be giving you my
10 warning on this. If I do not get clear answers to my
11 specific questions, I will sit here for the long term.
12 That is my last warning, Dr. Tsai.

13 Understood?

14 A. (In English) Yes.

15 Q. So once you press the diamond particles in
16 through the adhesive, does the roughness of the adhesive
17 get larger?

18 HAN Objecti n t m alling
19 speculation.

20 THE WITNESS: That is why we would like to
21 tell our students that we have a tolerance for this
22 layer and exactly how much this tolerance is, it all
23 depends, and that is related to our manufacturing skill
24 or our technology.

25 BY MR. HA:

1 Q. Okay. Pause on that.

2 Step No. 7.

3 When the epoxy gets deposited over the
4 adhesive, is the surface of the epoxy following the
5 roughness of the adhesive?

6 MR. CHAN: Objection. Form. Calling for
7 speculation.

8 THE WITNESS: What I'm talking about is the
9 concept we have, and you're talking about how to control
10 the dimension or the sizes of it. That is a technique.

11 Also, on the diamonds, we will also do some
12 processing.

13 BY MR. HA:

14 Q. Will you answer my question, Dr. Tsai?

15 Because I'll ask the same question over and
16 over again until my time runs out, if you do not. That
17 means we have another two and a half hours here on the
18 record, Dr. Tsai.

19 I'm going to ask my question one more time.

20 When the epoxy gets deposited over the
21 adhesive, does the surface of the epoxy follow the
22 roughness of the adhesive?

23 MR. CHAN: Objection. Form. Calling for
24 speculation.

25 THE WITNESS: (In English) Maybe yes, maybe

1 not.

2 BY MR. HA:

3 Q. So you don't know?

4 A. (In English) I don't know.

5 Q. Okay. In your opinion, is the top surface of
6 the epoxy flatter than the top surface of the substrate
7 here?

8 MR. CHAN: Objection to form. Calling for
9 speculation.

10 THE WITNESS: I did not do any experiments so
11 I don't know.

12 BY MR. HA:

13 Q. You don't know one way or the other, correct?

14 A. (In English) Maybe yes, maybe not.

15 Q. Okay. But you decided to measure the
16 designated profile or the baseline of the ODD using the
17 surface that presumably could be much more rough than
18 the top of the nanoparticles, which would have been
19 aligned against the flat plate, correct?

20 MR. CHAN: Objection. Form. Argumentative.
21 Objection. Form. Calling for speculation.

22 THE WITNESS: Whether it's a rough or not, we
23 had a tolerance for that, and then we will use that as a
24 baseline to do the alignment.

25 THE CHECK INTERPRETER: The witness did not

1 say "to do the alignment." "We just do that baseline."

2 BY MR. HA:

3 Q. And you never talked about the method to
4 measure that baseline in your paper, correct?

5 MR. CHAN: Objection. Form. Argumentative.

6 THE WITNESS: I don't think, in my paper, I
7 talked about that.

8 BY MR. HA:

9 Q. You're talking about that for the first time
10 today in this deposition, correct?

11 MR. CHAN: Objection. Form. Argumentative.

12 THE WITNESS: Are you talking about this
13 baseline?

14 BY MR. HA:

15 Q. Baseline for the ODD paper, sir.

16 A. Are you saying this is the first time?

17 Q. This is the first time you're talking about
18 that baseline in this proceeding, correct?

19 A. (In English) I don't remember.

20 (In Chinese) Since this paper is an old one,
21 it's about 10 -- more than 10 years ago. I was trying
22 to recall my memory to it.

23 In terms of this entire manufacturing
24 approach, it was performed by one of my students, and
25 when I reviewed this paper, then I could learn that the

1 measurement approach is using this baseline.

2 BY MR. HA:

3 Q. Where in the paper did you learn that this
4 baseline measurement approach is the way you drew it?

5 A. This figure is from this figure.

6 Q. What about that figure tells you the baseline
7 should be measured from the height of the top of the
8 epoxy?

9 MR. CHAN: Let the record reflect that the
10 witness was pointing to Figure 5B of Exhibit 1004.

11 THE WITNESS: If we move like this and do the
12 measurement, if you have the highs and the lows, then we
13 would define a baseline for that.

14 BY MR. HA:

15 Q. What about the CMP pad dresser made by the
16 '802 patent? Would you be able to measure the baseline
17 using the same technique?

18 MR. CHAN: Objection. Form. Calls for
19 speculation.

20 THE WITNESS: Using this technique to do the
21 measurement for '802 patent, it's very difficult. It's
22 almost undoable.

23 BY MR. HA:

24 Q. How would you measure the protrusion height
25 distances of the '802 patent CMP pad dressers?

1 MR. CHAN: Objection. Form. Beyond the
2 scope. Speculation.

3 THE WITNESS: There are many ways doing the
4 measurement. There are the optical approaches, there
5 are probing approaches. I was using the probing, but
6 today, mostly people using the optical approach to shoot
7 the light down and to do this measurement, the speed
8 would be faster.

9 BY MR. HA:

10 Q. So your testimony is, in Exhibit 1004, because
11 you used the scribing method, the baseline has to start
12 from the top of the epoxy, whereas, if you used the
13 optical imaging technique, your baseline starts from the
14 top of the diamond.

15 That's your testimony, sir?

16 MR. CHAN: Objection. Form. Argumentative.
17 Misstates testimony.

18 THE WITNESS: By using my method, I can only
19 measure a portion of that. I cannot measure the
20 entirety of it. By using the optical way, then you can
21 measure the entire disk.

22 BY MR. HA:

23 Q. Can you turn to Figure 8.

24 That's an SEM image, right?

25 A. (In English) Yes.

1 Q. Those are basically utilizing electrons as
2 light waves, correct?

3 A. SEM is something like a scanning emission,
4 something instrument or technique. That is it will
5 probably shoot electronics or some kind of wave to do
6 the measurement.

7 And also, let me see if I can see the
8 terminology there.

9 Q. I will represent to you that SEM stands for
10 "scanning electron microscope."

11 A. Okay.

12 Q. So in Figure 8, because you're now using
13 electrons as light waves, are you saying that the
14 baseline should be measured from the top of the diamond
15 tips now?

16 MR. CHAN: Objection. Form. Argumentative.
17 Misstates testimony.

18 THE WITNESS: No, no, no, no. What I was
19 talking about was FRT, not SEM. SEM only can take the
20 image of a small area, a small square, where the disk is
21 four inches.

22 THE CHECK INTERPRETER: "100 millimeter."

23 THE LEAD INTERPRETER: "100 millimeter."

24 BY MR. HA:

25 Q. So you're saying, if you measure the sample

1 with FRT, your baseline should be measured at the top of
2 the diamond tips, but if you measure using SEM or a
3 stylus-type 2D surface roughness measurement, your
4 baseline starts at the top of the epoxy?

5 A. I'm saying that using the probing approach, I
6 can only measure a portion of the entirety, where use
7 [sic] the FRT, then you can measure the entire thing.

8 Q. Correct.

9 So you're saying only with a technique that
10 can measure the entirety of the sample like FRT do you
11 use the base -- you use the top of the diamond particle
12 as a baseline, correct?

13 MR. CHAN: Objection. Form. Misstates
14 testimony. Argumentative.

15 THE WITNESS: I'm saying that if you want to
16 define the tip heights of all diamonds, then you have to
17 use FRT. Then you take the top tip to do the defining,
18 then it will be more effective.

19 BY MR. HA:

20 Q. So you are saying you need to image the entire
21 diamond disk such that you can image all of the top of
22 the tip heights and determine the designated profile to
23 be at the top of the diamond tips. You cannot
24 determine -- strike that.

25 Let me start over.

1 So you're saying that you need to image the
2 entire diamond disk such that you could image all of the
3 top of the tip heights and determine the designated
4 profile to get the top of the diamond tips. If you only
5 image some portion of the diamond disk, you have to
6 utilize the top of the substrate as the designated
7 profile.

8 That's your testimony, correct?

9 MR. CHAN: Objection. Form. Misstates
10 testimony. Calls for speculation. Argumentative.

11 THE WITNESS: Well, the answer is no, because
12 FRT can both image the entire diamond disk, as well as a
13 portion of it, where use the probing -- use the probe,
14 you can only measure a portion of that.

15 I also talked many times that in order to
16 determine or figure out the number of working diamond
17 particles, it's more effective to use the top of the tip
18 as the -- as the profile to do so, would be more
19 effective.

20 BY MR. HA:

21 Q. So why wasn't it effective to use the top of
22 the diamond tips in your ODD paper as a designated
23 profile?

24 MR. CHAN: Objection. Form.

25 THE WITNESS: I was using the probing approach

1 to do this experiment. That is because that our
2 intention back then was try to measure the differences
3 of those tip heights, and we only wanted to see those.
4 And the probing each -- each time you probe it, you get
5 a value and you take many, many data, many, many values,
6 in other words, and then you take the average of that.

7 So our intention back at that time doing the
8 experiment was not to look at the entirety of it.
9 Rather, just look at the difference of the tip heights
10 and then to analyze the working diamond particles, the
11 number of working diamond particles.

12 THE CHECK INTERPRETER: "When we perform the
13 probing, we can find a value each time, and for
14 different values that we obtain, we get an average
15 value. And the purpose for the research was to
16 determine the protrusion differences between different
17 tips. And we were not thinking of researching or
18 studying the distribution of all the diamonds on the
19 disk because we did not want to analyze the number of
20 working particles."

21 BY MR. HA:

22 Q. Can you just tell me very clearly for a given
23 sample when you decide -- strike that.

24 Can you just tell me very clearly, for the
25 record, for a given sample, how do you decide to utilize

1 the top of the diamond tips as the designated profile
2 versus the top of the substrate as the designated
3 profile?

4 MR. CHAN: Objection. Beyond the scope.
5 Form.

6 MR. HA: How is it beyond the scope, Alex?

7 MR. CHAN: -- experiment --

8 MR. HA: This is about how to determine where
9 to measure the designated profile, whether it's from the
10 substrate or the top of the diamond tips. This is what
11 he opined on in your redirect, which is clearly contrary
12 to what he said during my cross.

13 MR. CHAN: In your direct you never mentioned
14 anything about using the tip for the measurement in his
15 experiment.

16 MR. HA: I said "determine," not "measure," in
17 my question.

18 MR. CHAN: Determine. Okay. This is what you
19 believe. I'll give you the leeway.

20 THE WITNESS: Assuming there are 20,000 to
21 30,000 diamond particles on a diamond disk, then if you
22 want to know about the number of working particles, you
23 then will do the measurement to know which tip points
24 are working. Then, for that purpose, if you define the
25 designated profile from the top and down to do so, that

1 would be the most effective way.

2 THE CHECK INTERPRETER: "The most convenient
3 way."

4 BY MR. HA:

5 Q. How do you determine if the designated profile
6 should begin from the top of the substrate, then?

7 A. In my paper research, we only intend to study
8 a portion of the disk. We did not want to talk about
9 the number of the working particles. We were only
10 intending to talk about the height differences created
11 by ODD, and to compare if it's smaller than BDD. And in
12 that case, what would be the influence or impact to the
13 pad and the wafer.

14 Q. So if I'm understanding your testimony
15 correctly, to determine whether the designated
16 profile -- strike that. I'm tired. Let me try again.

17 So if I understand your testimony correctly,
18 to determine the designated profile from the top of the
19 diamond tips, you have to first determine the working
20 particles; whereas, if you want to determine the
21 designated profile starting from the baseline, you just
22 measure the heights.

23 Is that your testimony?

24 MR. CHAN: Objection. Objection. Form.
25 Misstates testimony.

1 THE WITNESS: No, no, no. What I was saying,
2 that if you want to look at the number of diamond
3 working particles, then you need to entire the entirety
4 of the diamond particles to determine the quantity of
5 the working particles. Then it would be better to
6 measure from the top.

7 And in my paper, I did not intend to look at
8 the number of working particles, I was only intending to
9 look at the height differences between the ODD and the
10 BDD.

11 THE CHECK INTERPRETER: One correction. Not
12 "entire the entirety," "measure the entirety."

13 I think you're tired.

14 BY MR. HA:

15 Q. Do you know how to construe claim terms?

16 A. I'm only focusing and concentrating on my
17 technology, profession and knowledge. Regarding the
18 patents, as well as the laws, it's the counsel who is
19 taking care of that.

20 Q. So did counsel tell you how to interpret
21 designated profile?

22 MR. CHAN: Objection. Form. Seeking
23 privileged information. I instruct the witness not to
24 respond to this question.

25 BY MR. HA:

1 Q. I'm asking for a "yes" or "no."

2 Without divulging attorney-client privileged
3 information, did counsel tell you how to construe
4 designated profile?

5 MR. CHAN: Without waiving privileged
6 information, you may just answer "yes" or "no."

7 THE WITNESS: No.

8 BY MR. HA:

9 Q. You testified that, in your opinion,
10 designated profile should be determined from the top of
11 the diamond height. Strike that.

12 You testified that, in your opinion, the term
13 "designated profile" should be determined from the top
14 of the diamond particles, correct?

15 MR. CHAN: Objection. Form. Misstates
16 testimony.

17 THE WITNESS: No. I was talking about the
18 highest particle.

19 BY MR. HA:

20 Q. Thank you for that clarification. Let me ask
21 the question one more time.

22 You testified that, in your opinion, the term
23 "designated profile" should be determined from the top
24 of the highest protruding particle, correct?

25 A. If you want to determine the number of working

1 particles, then yes.

2 Q. What if you don't want to determine the number
3 of working particles? Do you determine the
4 predetermined height from the top of the highest
5 protruding tip, or some other location?

6 A. Can you repeat the question again?

7 MR. CHAN: Objection. Form.

8 THE WITNESS: For that, I'm not sure.

9 BY MR. HA:

10 Q. So you're only sure how to interpret the term
11 "designated profile" in the scenario where you want to
12 determine the number of working particles, correct?

13 MR. CHAN: Objection. Form. Argumentative.

14 THE WITNESS: That is only if you want to know
15 the protrusion height of the diamonds. Then you need to
16 predetermine a height.

17 Then without that, I don't know why you want
18 to have a predetermined height by using the top of the
19 protrusion particles, because when we do our research we
20 should have a goal to do what we want to do. So without
21 a goal, I don't know why you want to say this.

22 MR. HA: No further questions.

23 MR. CHAN: Just one more question.

24

25

FURTHER EXAMINATION

1 BY MR. CHAN:

2 Q. Counsel for petitioner mentioned the phrase
3 "designated profile and substrate" -- during his
4 questioning.

5 For the record, did you interpret that phrase
6 to mean that it is a designated profile and substrate?

7 MR. TAN: Objection. Misstates the record.

8 THE WITNESS: No.

9 MR. CHAN: No further questions.

10

11 (Off the record at 8:59 p.m.)

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ACKNOWLEDGMENT OF DEPONENT

I, MING-YI TSAI, do hereby acknowledge that I have read and examined the foregoing testimony, and the same is a true, correct and complete transcription of the testimony given by me and any corrections appear on the attached Errata sheet signed by me.

(DATE)

(SIGNATURE)

1 CERTIFICATE OF SHORTHAND REPORTER

2

3 I, Mark McClure, Certified Reporter within and
4 for the State of California, do hereby certify:

5

6 That MING YI TSAI, the witness whose
7 deposition is hereinbefore set forth, was duly sworn by
8 me before the commencement of such deposition and that
9 such deposition was taken before me and is a true record
10 of the testimony given by such witness.

11

12 I further certify that the adverse party,
13 Chien Min Sung, was represented by counsel at the deposition.

14

15 I further certify that the deposition of
16 MING YI TSAI occurred at National Chin Yi University of
17 Technology, No. 57, Section 2, Zhongshan Road, Taiping
18 District, Taichung City 411030, Taiwan, on Monday,
19 February 17, 2025, commencing at 8:31 a.m. to 8:59 p.m.,
20 Taipei Standard Time.

21

22 I further certify that I am not related to any
23 of the parties to this action by blood or marriage, I am
24 not employed by or an attorney to any of the parties to
25 this action, and that I am in no way interested,

1 financially or otherwise, in the outcome of this matter.

2

3 IN WITNESS WHEREOF, I have hereunto set my

4 hand this 3rd day of March, 2025.

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