1 UNITED STATES INTERNATIONAL TRADE COMMISSION
2 WASHINGTON, D.C.
3
4
5 In the Matter of:)
6 CERTAIN ELECTRONIC)
7 DEVICES, INCLUDING) Investigation No.
SMARTPHONES, COMPUTERS) 337-TA-1373
8 TABLET COMPUTERS AND)
COMPONENTS THEREOF)
9)
10
11
12
13
14
15
16 The virtual video-recorded deposition of
17 ALEXANDER REZNIK, called by the Respondent for
18 examination, pursuant to stipulation, and
19 pursuant to the Rules of Procedure for the
20 International Trade Commission, taken
21 stenographically by JENNIFER MILLER, RMR, CRR,
22 CCR, via Zoom, on the 14th day of March, 2024,
23 at the hour of 8:04 a.m. ET.
24
25

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* * * * * *
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1 I N D E X

2 WITNESS PAGE

3 ALEXANDER REZNIK

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8 E X H I B I T S

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10 Exhibit 2 Email dated March 3, 2024 18

11 Exhibit 3 LinkedIn Profile 33

12 Exhibit 4 Patent US 8,200,265 B2 93

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15 Exhibit 7 Publication Number US 2007/0191028 118

16 Exhibit 8 Publication Number US 2009/0298419 A1 127

17

18 Exhibit 9 Publication Number WO 2005/107285 135

19 Exhibit 10 US 9,173,054 B2 141

20 Exhibit 11 Provisional Application 61140126 190

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1 of the road, at least not well, right.
2 And then there are some other
3 ways to tell it two devices are close to
4 each other, but they're not really great
5 for transferring information.
6 So I think where we kind of
7 landed is one of the reasons he couldn't
8 just do it and couldn't figure out, let's
9 say, a simple way to do it within his
10 scope of knowledge. You didn't kind of
11 have a natural underlying technological
12 way to do both things.
13 BY ATTORNEY LEE:
14 Q. Let's back that up a little bit then.
15 What were the known ways to
16 transfer data that he refers to?
17 A. So any kind of wireless transfer
18 technology. So WiFi for sure. You know,
19 mobile. Because, by that time, mobile phones
20 were data transfer devices, right.
21 So those were the connectivity
22 options. And then somehow they all involved
23 having an application server somewhere, like a
24 Dropbox or something, right, that would
25 facilitate it or something like that. I'm sure

1 there may have been some other ones that we had
2 in mind.
3 Q. So those were WiFi and cellular data
4 transfer; is that right?
5 A. Right. So you're asking me today
6 what were reasonable technologies back then for
7 data transfer.
8 WiFi and cellular definitely
9 come to mind. I think -- the wireless transfer
10 data, right. If it was a laptop and not a
11 phone, you could plug it in and do
12 ethernet-based communications. So things that
13 naturally lent themselves to IP-based
14 networking.
15 Q. Was Bluetooth technology a technology
16 capable of transferring data as well?
17 A. In principle, yes. At least at the
18 time, it was used more for, you know, the kind
19 of things that we're using it for right now as
20 opposed to data transfer.
21 Q. You had mentioned that based on those
22 known technologies at that time, such as the
23 WiFi or cellular, the problem was that there
24 was not an easy way to get data across using
25 those technologies between different devices?

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1 A. No. You could get data across with
2 those technologies that could do data transfer.
3 You really had no easy way of
4 saying, hey, there's a device that is
5 physically right next to me.
6 And that is, to a certain
7 extent, still true today with -- for sure with
8 cellular, right. If your phone and my phone
9 are lying next to each other on the table and
10 you only use the cellular capabilities of your
11 phone, right, they don't have any way of
12 figuring out that they're right next to each
13 other.
14 They have other means of doing
15 it to date, right. But if you restrict to just
16 a cellular, they're both connected to a base
17 station somewhere far away.
18 Q. What were the solutions back in 2008,
19 when you're working on this with Mr. Carlton,
20 in terms of figuring out devices that are
21 nearby each other?
22 A. So technologies like Bluetooth,
23 right, so -- and I mentioned before the 802.15
24 family of standards. There's a couple of other
25 ones in there. They tend to be pretty good at

1 figuring out what devices are nearby, right.
2 That's why we use Bluetooth for wireless phones
3 and stuff like that.
4 Certainly it's not the only
5 technology that is -- that you could, in
6 theory, use to do that. There is a whole suite
7 of wireless technologies that is used in the
8 IoT space today that is good for that.
9 How many of them were actually
10 available in 2007, '8, '9 time frame? I'd have
11 to go back and look. I don't recall.
12 Q. What was the solution you had in mind
13 when you were having this discussion with
14 Mr. Carlton?
15 A. So as I recall, right, once we kind
16 of realized that, hey, the reason this is hard
17 is because you don't have the technology that
18 can do both proximity and transfer in a natural
19 way, the solution became, you know, we've got
20 one set of technologies that can do the
21 proximity, right, that can figure out the two
22 devices are next to each other. We have
23 another set of technologies that could
24 affectively do data communication.
25 Let's figure out how we take

1 advantage of both to actually achieve this
2 result that we wanted to achieve, which is
3 digital equivalent of handing a piece of paper
4 over to something that's right next to you.
5 Q. I see.
6 Was there ever a prototype made
7 demonstrating this technology that you came up
8 with?
9 A. Not that I recall.
10 Q. So you did not come up with any
11 prototype for this technology?
12 ATTORNEY HEJNY: Object to form.
13 THE WITNESS: Correct. I
14 personally was not involved in any
15 prototype development beyond the concept
16 that we came up with.
17 BY ATTORNEY LEE:
18 Q. Your team also was not involved in
19 development of any prototype, correct?
20 A. Correct.
21 Q. Did Mr. Carlton's team come up with a
22 prototype?
23 A. You would have to ask him for an
24 accurate answer. The best that I can give you
25 is I do not recall seeing a prototype.

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1 trying to achieve.
2 Q. Did you have any specific technology
3 in mind for those two things that had to be
4 done?
5 A. So we were looking at families of
6 technologies, right. So I mentioned cellular
7 and WiFi as two good families for data
8 transfer.
9 I mentioned, you know,
10 802.15-type stuff -- Bluetooth, Zigbee, for
11 example -- as things that would have been good
12 for proximity detection.
13 Whether we stopped at that point
14 and we said, "Hey, this is the best one in this
15 family or this is the best one in that family,"
16 I don't remember, right. We kind of said
17 there's options on both sides.
18 Q. And you left it at that point because
19 it was obvious what kind of technology you
20 would use at that time?
21 ATTORNEY HEJNY: Object to form.
22 THE WITNESS: I'm not sure what
23 you mean by "left it." I'm also not sure
24 what you mean by "obvious."
25

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1 line 50, which is page 13 of Exhibit 6.
2 A. I am there.
3 Q. It talks about configure
4 information --
5 - - -
6 (Stenographer clarification.)
7 - - -
8 BY ATTORNEY LEE:
9 Q. At line 50 it talks about
10 configuration information 309, and then goes on
11 to say that [as read]:
12 "309 may include settings for
13 attributes such as power level,
14 antenna orientation, security
15 parameters and the like."
16 So I want to get a better
17 understanding of what configuration information
18 309 is.
19 Could you tell me more about
20 what that is?
21 ATTORNEY HEJNY: Object to form.
22 THE WITNESS: I would have to
23 read a little bit more and look at the
24 figure that 309 refers to.
25

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1 BY ATTORNEY LEE:
2 Q. I understand.
3 It seems like, at least the
4 portions we have looked at together just now, I
5 am not seeing any specific discussion of using
6 WiFi to transfer data.
7 Is that a fair characterization?
8 ATTORNEY HEJNY: Object to form.
9 THE WITNESS: If you're saying
10 that WiFi is not specifically mentioned,
11 no, it's not specifically mentioned.
12 Is it implied when we talk about
13 layer 2, 3? You know, to me, the way I
14 read it now, we certain -- WiFi is
15 certainly one of the things we had in
16 mind.
17 BY ATTORNEY LEE:
18 Q. Okay. And would Bluetooth also be a
19 technology you had in mind when referring to
20 these layer 2, layer 3, and baseband?
21 ATTORNEY HEJNY: Object to form.
22 THE WITNESS: Actually, although
23 if -- the way I am looking at the problem
24 we're trying to solve here, right,
25 Bluetooth is usually more of a proximity

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1 technology.
2 This paragraph refers to a data
3 transmission technology.
4 I think, for that, we would be
5 leaning towards WiFi and cellular as more
6 typical uses as opposed to Bluetooth.
7 BY ATTORNEY LEE:
8 Q. Bluetooth was also used to transfer
9 data fairly regularly back in 2008, was it not?
10 ATTORNEY HEJNY: Object to form.
11 THE WITNESS: Some allowance of
12 data, but you did not see local area
13 networks built on Bluetooth or ad hoc
14 networks borne together by Bluetooth
15 devices.
16 So in my opinion, it was not a
17 great technology for data transfer, you
18 know, video transfer and things like this.
19 It was designed for specific things, like
20 connectivity to peripherals that are
21 nearby, connectivity to devices that were
22 nearby and was good at that. It can do a
23 bit more today. But, you know, 14 years
24 ago, it was quite limited.
25

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