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

APPLE, INC.,	)	
	)	
Petitioner,	)	
	)	
VS.	)	Case Nos. IPR2024-00806
	)	IPR2024-00807
RESONANT SYSTEMS, INC.,	)	
	)	
Patent Owner.	)	
_____	)	

REMOTE DEPOSITION OF
DR. BLAKE HANNAFORD
TUESDAY, JUNE 24, 2025

STENOGRAPHIC REPORTER: CHRISTA YAN, CSR NO. 14316, RPR

1 APPEARANCES:

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E X H I B I T S

EXHIBIT FOR IDENTIFICATION

PAGE

No Exhibits Marked.

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1 BE IT REMEMBERED that on TUESDAY, the 24TH DAY OF
2 JUNE, 2025, at the hour of 9:33 a.m., of said day, before
3 me remotely, CHRISTA YAN, a Certified Shorthand Reporter,
4 State of California, REMOTELY appeared DR. BLAKE
5 HANNAFORD, who was examined as a witness in said cause;
6 that said transcript format was prepared in accordance
7 with California Code of Regulations Section 2473.

8 --oOo--

9 DR. BLAKE HANNAFORD,
10 the Witness, called on behalf of the Patent Owner, being
11 duly sworn to state the truth, the whole truth, and
12 nothing but the truth, testified on oath as follows:

13 EXAMINATION

14 BY MR. RUBIN:

15 Q Good morning again, Dr. Hannaford.

16 A Good morning, Mr. Rubin.

17 Q So you and I had a deposition yesterday in some
18 related matters; is that right?

19 A That's correct.

20 Q And you're familiar with the deposition process?

21 A Yes.

22 Q Do you have any questions about the deposition
23 process or... what we'll be doing today?

24 A No.

25 Q Are you currently experiencing any illness or

1 taking any medication that would affect your ability to
2 answer questions today or to remember facts?

3 A No.

4 Q Is there any other reason that you cannot give
5 complete and accurate testimony here today?

6 A No.

7 Q We're here today in connection with two IPRs
8 filed against Resonant Systems, Inc., patents by Apple,
9 IPR2024-00806 and IPR2024-00807. Is that your
10 understanding?

11 A Yes.

12 Q And in each of those two IPRs I just listed, you
13 submitted supplemental expert declarations dated May 29,
14 2025; is that right?

15 A Yes, if I recall the date correctly.

16 Q And I will share these in the chat function in
17 Zoom PDF copies of those declarations as they were filed
18 with the PTAB. Are you able to download those?

19 A Yeah, that sounds great. That process seemed to
20 work very smoothly yesterday. I am downloading them right
21 now. And I was successful.

22 Q All right. Do you have any printed materials
23 here with you today for use in the deposition?

24 A No.

25 Q Okay. So you didn't -- withdrawn.

1 Yesterday, you had printed copies of your
2 declarations, but it sounds like today, you don't have
3 printed copies of the declarations; is that right?

4 A That's correct.

5 Q Okay. Do you have electronic copies of any
6 materials that you'll be consulting today during the
7 deposition, with the exception of items that I share in
8 the chat?

9 A No. Only the items. I made a special folder for
10 these downloads from this chat, and that's what I'm going
11 to be limited to.

12 Q Okay. Sitting here right now are you aware of
13 any errors or things that you would wish to correct in
14 either of the two declarations we're here to address
15 today?

16 A No.

17 Q I've just uploaded in the Zoom chat function
18 Exhibit 2009 from the 00807 IPR, which is titled, Expert
19 Declaration of the Keith W. Goossen, PhD?

20 A And I have that.

21 Q And I take it that you reviewed Dr. Goossen's
22 declaration in preparing your supplemental declarations in
23 these IPRs?

24 A Yes.

25 Q You should see now on your screen Exhibit 2009,

1 Dr. Goossen's declaration, which I'm sharing via Zoom.

2 A Yeah, I see the title page right now.

3 Q So I'd like to call your attention to the section
4 that starts in paragraph 128 of Dr. Goossen's declaration
5 addressing the limitation flux paths comprising of
6 paramagnetic material. Do you see that?

7 A I... yes, I do see that.

8 Q Now going down to paragraph 144, Dr. Goossen
9 calculates the relative permeability of aluminum as
10 approximately 1.000022. Do you see that?

11 A I see that.

12 Q And you don't dispute that that's approximately
13 the correct value for the relative permeability of
14 aluminum?

15 A I can't vouch for all the decimal places, but
16 that value doesn't surprise me.

17 Q Now on paragraph 143, Dr. Goossen refers to a
18 permeability, quote, In the thousands. Would you agree
19 that a paramagnetic material would typically have a
20 permeability in the thousands, that is a relative
21 permeability in the thousands?

22 A Sitting here, to answer that precisely, I feel I
23 would have to look it up. But that number is not -- does
24 seem reasonable to me.

25 Q Turning to paragraph 137 of Dr. Goossen's

1 declaration, there, he reproduces an annotated Wakuda
2 Figure 1B which I believe appeared in your earlier
3 declaration in this IPR. Do you recognize this annotated
4 figure?

5 A I do recognize the figure.

6 Q And so there are these -- withdrawn.

7 There are these red rectangles which are labeled,
8 Magnetic flux. Do you see that?

9 A I see that.

10 Q And the red highlights are on top of rectangles
11 in the original Wakuda reference that are made up of black
12 lines with arrows on them. Do you see that?

13 A Yes, I see that as well.

14 Q And so the figure from Wakuda as annotated with
15 the red lines shows that magnetic flux lines run inside
16 and parallel to the casing which is highlighted in blue,
17 correct?

18 A It shows magnetic flux lines inside the casing,
19 yes.

20 Q Dr. Goossen offers the opinion that one would see
21 magnetic field lines -- withdrawn.

22 Dr. Goossen offers the opinion that one would see
23 lines of magnetic flux confined within the casing like as
24 shown in this Wakuda figure if the casing were made out of
25 material with a relative permeability in the thousands,

1 but that one would not see the field lines, the flux
2 lines, confined within the casing if it were made of a
3 material with a permeability of 1.000022 such as aluminum.

4 Do you dispute that opinion of Dr. Goossen's?

5 A The -- I think neither the figure -- neither
6 Wakuda's figure or that description describe all the flux.
7 So some flux lines are not shown.

8 Q Focusing on the flux lines that are shown,
9 Wakuda's figure shows that flux lines that enter the
10 casing, annotated here in blue, bend by approximately
11 90 degrees, travel through the casing and then again at
12 approximately 90 degrees when they exit the casing. Do
13 you see that?

14 A I see those rectangular shapes with 90-degree
15 angles, yes.

16 Q And do you agree that for magnetic flux lines to
17 bend in that dramatic fashion upon entering a material,
18 that that material would have to have a high magnetic
19 permeability?

20 MR. ROZYLOWICZ: Objection. Scope.

21 THE WITNESS: I interpret these lines in this diagram
22 as a schematic illustration of an approximate flux path,
23 but I think any POSITA would recognize that essentially,
24 no -- in fact, no physical magnetic field would have
25 right-angle bends in it, that this is not, for example, a

1 computational analysis of the magnetic flux. It's not
2 obtained by solving flux equations. It's a schematic
3 pathway.

4 BY MR. RUBIN:

5 Q Do you agree that the magnetic field line passes
6 from one material into a second material that has the same
7 relative permeability as the first, that there will be no
8 abrupt bend in the direction of the magnetic field line as
9 you pass from the first material into the second?

10 MR. ROZYLOWICZ: Objection. Form.

11 THE WITNESS: Yeah, I'd have to form another opinion
12 about that, I think. I'm not sure if you're referring to
13 any specific pair of materials in this diagram or how
14 your -- what your context is for that question. Maybe you
15 can nail that down a little bit more for me.

16 BY MR. RUBIN:

17 Q Okay. So let's focus on the upper one of the two
18 red rectangles in this figure.

19 A Okay.

20 Q Let's focus on the upper left-hand corner of that
21 rectangle.

22 A Okay.

23 Q There we have flux lines that are traveling
24 through the casing and then exit the material of the
25 casing in a downward direction. Do you see that?

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1 A To the extent that that rectangle represents flux
2 lines, yes. I repeat my previous answer that that's a
3 schematic representation of a flux path. But no POSITA
4 would ever recognize a rectangle as a physically realistic
5 flux diagram in my opinion.

6 Q The flux lines exit the casing material at that
7 corner of the rectangle. They're traveling from the
8 casing material into air; is that right?

9 MR. ROZYLOWICZ: Objection. Form.

10 THE WITNESS: Yeah, I'm sorry. There was a little
11 audio glitch in the beginning of your question. So...
12 probably should repeat it.

13 BY MR. RUBIN:

14 Q One second.

15 When the magnetic flux lines in this -- in the
16 vicinity of the upper left-hand corner of the top
17 rectangle exit the casing, they enter the air, correct?

18 A I don't believe those dashed lines with arrows
19 forming a rectangle actually represent magnetic field
20 lines. I believe they're a schematic representation of a
21 path.

22 THE STENOGRAPHIC REPORTER: I'm sorry, Counsel. Are
23 you saying enter the air, a-i-r, air?

24 MR. RUBIN: That's right.

25 THE STENOGRAPHIC REPORTER: Thank you.

1 BY MR. RUBIN:

2 Q Okay. Now, Wakuda labels those paths in
3 Figure 1B with the Greek letter phi, correct?

4 A Yes, I see that.

5 Q And you or whoever prepared this, the annotations
6 in this figure, added an annotation with an arrow pointing
7 to the phi labeled magnetic flux, correct?

8 A Yes.

9 Q And that's because the Greek letter phi is
10 commonly used to represent a magnetic flux; is that right?

11 A Yes.

12 Q Okay. So whether it's in a schematic sense or
13 not, those rectangles are representing magnetic flux,
14 correct?

15 MR. ROZYLOWICZ: Objection. Form.

16 THE WITNESS: I believe that rectangle represents a
17 schematic flux path.

18 BY MR. RUBIN:

19 Q And so in particular, represents magnetic flux
20 that travels from the casing material into the air, in the
21 vicinity of the upper left-hand corner of that rectangle,
22 right?

23 MR. ROZYLOWICZ: Objection. Form.

24 THE WITNESS: I'm not sure that characterizes what I
25 said. A schematic is a conceptual and approximate

1 representation of anything. And in this case, it's a
2 conceptual and approximate representation of a set of
3 magnetic field lines which are not shown.

4 BY MR. RUBIN:

5 Q So -- withdrawn.

6 So is it your testimony that you can't tell from
7 Wakuda Figure 1B anything at all about the actual path
8 that the magnetic field lines travel on?

9 MR. ROZYLOWICZ: Objection. Form.

10 BY MR. RUBIN:

11 Q The Wakuda device?

12 MR. ROZYLOWICZ: Sorry.

13 THE WITNESS: I believe this diagram illustrates a
14 magnetic flux path at a schematic level. So it -- in that
15 sense, I do not say that you can't tell anything.

16 BY MR. RUBIN:

17 Q Okay. Can you tell from this figure whether any
18 portion of the magnetic flux path travels through air?

19 MR. ROZYLOWICZ: Objection. Form.

20 THE WITNESS: I believe in converting -- in attempting
21 to convert this schematic representation to actual
22 magnetic field lines, a POSITA would know that in some
23 combination, flux goes in the casing and in the outside
24 air or in all the air.

25

1 BY MR. RUBIN:

2 Q I'm sorry. What was that?

3 THE STENOGRAPHIC REPORTER: That was not me. I'm not
4 sure what that was.

5 BY MR. RUBIN:

6 Q Would a POSITA looking at the schematic flux
7 paths in Wakuda Figure 1B know whether magnetic field
8 lines travel from the casing material into air?

9 MR. ROZYLOWICZ: Objection. Form.

10 THE WITNESS: The schematic flux path that's shown by
11 the rectangle goes through air, in part. So yes.

12 BY MR. RUBIN:

13 Q So suppose that someone skilled in the art --
14 well, withdrawn.

15 So you've said a number of times that you think
16 this is -- withdrawn.

17 You said a number of times that you think the
18 rectangles of magnetic flux in Wakuda Figure 1B are a
19 schematic representation of the magnetic field lines; is
20 that right?

21 A Yes.

22 Q And I think you referred earlier to the
23 possibility of someone doing a numerical simulation of
24 what the magnetic field lines would actually look like for
25 a system like what's depicted in Wakuda Figure 1B. You

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1 agree that it would be possible to do such a numerical
2 simulation?

3 MR. ROZYLOWICZ: Objection. Form.

4 THE WITNESS: I agree it would be possible.

5 BY MR. RUBIN:

6 Q Suppose that you looked at the magnetic field
7 lines in such a numerical simulation and you looked at all
8 the direction of those magnetic field lines bent that the
9 interface between the casing material and the air, would
10 you agree that if the casing material was made of the
11 same -- would you agree that if the casing material had
12 the same relative permeability as the air, that there
13 would be no bend in the direction of the magnetic field
14 lines at that interface?

15 MR. ROZYLOWICZ: Objection. Form.

16 THE WITNESS: Yeah, I don't want to speculate on the
17 results of a numerical simulation. But if I do agree that
18 if the casing and the air were identical, then there would
19 be no difference.

20 BY MR. RUBIN:

21 Q So would you agree that in that numerical
22 simulation of the magnetic field lines, that you would
23 expect that if the relative permeability of the casing
24 material were increased, that the amount by which the
25 magnetic field lines bent that the interface between that

1 material and the air would also increase?

2 MR. ROZYLOWICZ: Objection. Form.

3 THE WITNESS: Sitting here right now without diving
4 into it more, I would agree with that.

5 BY MR. RUBIN:

6 Q All right. Now I'm sharing on my screen your
7 supplemental declaration concerning the '830 patent which
8 is Exhibit 1049 in the IPR ending in 806. Do you see
9 that?

10 A Yes. And I have just -- using those two numbers,
11 1049 and 806, I have also opened that document.

12 Q Actually -- actually, let's switch to the other
13 declaration. My apologies.

14 So now, you should see shared on the screen your
15 supplemental declaration concerning the -- withdrawn. You
16 should now see on your screen your second declaration
17 concerning the '337 patent, which is Exhibit 1049 in the
18 IPR ending in 00807. Do you see that?

19 A Yeah, I have now opened the one that's 1049,
20 00807, contains both of those numbers in the title.

21 Q So here, you offer some opinions concerning the
22 drive signal S1 in the Wakuda prior reference. Do you
23 recall that? Sorry, did you hear my question?

24 A I did not. I did not hear a question. I
25 apologize.

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1 Q Okay. So in your second declaration concerning
2 the '337 patent, you offer some opinions concerning the
3 drive signal S1 in Wakuda. Do you recall that?

4 A Yes. Assuming by second declaration, you mean
5 the one that we're looking at right now.

6 Q That's what I mean, yeah.

7 And turning to paragraph 6 of this declaration,
8 you refer to an argument by patent owner that that drive
9 signal S1 only corresponds to the directional output D of
10 the '337 patent. Do you see that?

11 A I see that sentence. Yes.

12 Q I'm going to share, using the chat function, the
13 '337 patent. You should be able to download now
14 Exhibit 1001 and the IPR ending in 00807, which is a copy
15 update, '337 copy.

16 A I have the '337 now, yes, thanks to your
17 download. Thanks to your -- I mean, I downloaded it from
18 your chat.

19 Q Okay. And so you'll recall that the '337 patent
20 includes Figures 7A, 7B, and 7C, which describe certain
21 steps of an algorithm.

22 A Yes, I recall and see those figures.

23 Q And so there have been -- well, withdrawn.

24 So in particular, in Figure 7A the step
25 identified as 708 includes outputting of a signal D. Do

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1 you see that?

2 A Yes.

3 THE STENOGRAPHIC REPORTER: I'm sorry, Counsel. Did
4 you say signal date or signal D?

5 MR. RUBIN: Signal D, as in the fourth letter of the
6 alphabet.

7 THE STENOGRAPHIC REPORTER: Thank you.

8 BY MR. RUBIN:

9 Q And then turning to Figure 7C of the '337 patent,
10 the step labeled 762 includes outputting a signal P to the
11 power supply. Do you see that?

12 A I see that.

13 Q So in your opinion, does Wakuda perform both of
14 those steps outputting signal D and outputting signal P?

15 MR. ROZYLOWICZ: Objection. Form.

16 THE WITNESS: My opinion is the drive means of Wakuda
17 outputs both a direction and a magnitude. Which are an
18 output and a direction.

19 BY MR. RUBIN:

20 Q And what, in your opinion, in Wakuda is the power
21 supply?

22 A The composite figure we've reproduced that you're
23 showing right now at the bottom of page 3, which, you
24 know, it combines Figures 3 and 4 of Wakuda, designates
25 that the drive means is what supplies power to the

1 vibrating device. It's the power supply.

2 Q So in your opinion, the drive means 13 of Wakuda
3 is what corresponds to the power supply in the '337
4 patent?

5 MR. ROZYLOWICZ: Objection. Form.

6 THE WITNESS: Yes.

7 BY MR. RUBIN:

8 Q So Step 762 of the '337 patent includes
9 outputting P to the power supply. So in your opinion does
10 Wakuda perform both the step of outputting the signal D
11 and the step of outputting the signal P to the power
12 supply?

13 A Yes.

14 Q So where in Wakuda is the signal D of the '337
15 patent?

16 A It comes from the sign of the waveform applied by
17 the drive means, the drive current, for example.

18 Q Where in Wakuda is the step of outputting the
19 signal P to the power supply performed?

20 MR. ROZYLOWICZ: Objection. Form.

21 THE WITNESS: If I may, I'd like to refresh my memory
22 with my declaration on this. So I'm going to look a
23 little bit on that.

24 Okay. I've looked. I've refreshed my memory.
25 So I'm sorry to take a while. Could you please repeat the

1 question?

2 BY MR. RUBIN:

3 Q So where in Wakuda is the step of outputting the
4 signal P to the power supply performed?

5 A It's out -- it's out -- it's -- the signal is
6 generated by signal generation means. And that's where
7 the step is performed. Also, we rely extensively on a
8 combination with Gregorio for more details about
9 generating the waveform or the drive signal or the drive
10 signals, the components of the drive signal.

11 Q You report to relying on Gregorio. Do you agree
12 that for grounds 1 and 2 in the '337 IPR, you argue that
13 claims of the '337 patent are obvious without relying on
14 Gregorio, correct?

15 A Yes.

16 Q So in the grounds 1 and 2 -- withdrawn.

17 So in the combinations in grounds 1 and 2 of the
18 '337 IPR, it's your opinion that the outputting of the
19 drive signal S1 to the drive mains in Wakuda satisfies the
20 '337 patent step of outputting signal P to the power
21 supply?

22 A Well, I don't think we rely on combinations. So
23 I think Wakuda alone discloses that the drive signals S1,
24 and we quote it right here on this same page. For
25 example, it has a plurality of patterns, the patterns are

1 selected, and that, you know, if you look at the example
2 of patterns, they have different magnitudes, frequencies
3 and directions.

4 So to do that, I believe Wakuda is disclosing in
5 terms that a POSITA would understand, that the signal S1
6 has both direction and position information in it or P,
7 power information.

8 Q Do you have an opinion on the drive signal S1 of
9 Wakuda corresponds to both signal D and signal P in the
10 '337 patent?

11 MR. ROZYLOWICZ: Objection. Form.

12 THE WITNESS: I believe -- my opinion is it carries
13 that, both of those pieces of information, the drive
14 signal S1.

15 MR. RUBIN: All right. I have no further questions
16 for this morning. Done for today.

17 THE STENOGRAPHIC REPORTER: Okay. Tom, do you have
18 any line of questioning?

19 MR. ROZYLOWICZ: Can we -- I don't know that we do.
20 Can we take a -- if I can respectfully request a short
21 break and then I'll kind of confirm kind of whether
22 there's any further questions. If we can -- can we jump
23 back on here at -- oh, gosh, you're California. It's
24 10:35 now. If we can jump back on at 10:50 to confirm.

25 Counsel, does that work for you?

1 MR. RUBIN: That's fine.

2 MR. ROZYLOWICZ: Thanks, Counsel.

3 THE WITNESS: It's okay with me. See you at 10:50.

4 (Recess taken.)

5 MR. ROZYLOWICZ: I'd just like to confirm that Apple
6 has no further questions.

7 MR. RUBIN: Okay. I guess we can go back off the
8 record then.

9 THE STENOGRAPHIC REPORTER: All right. Perfect.
10 Thank you so much.

11 (WHEREUPON THE DEPOSITION WAS

12 CONCLUDED AT 10:52 A.M.)

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Please be advised I have read the
foregoing deposition, pages 1 through
25, inclusive.

I hereby state there are:

(Check one) _____ no corrections
 _____ corrections per attached

DR. BLAKE HANNAFORD

--oOo--

WITNESS'S CHANGES OR CORRECTIONS

NOTE: If you are adding to your testimony, print the exact words you want to add. If you are deleting from your testimony, print the exact words you want to delete. Specify with "Add" or "Delete" and sign this form.

Deposition of: DR. BLAKE HANNAFORD
Case Title: APPLE V. RESONANT
Date of Deposition: JUNE 24, 2025

I, _____ have

the following corrections to make to my deposition:

Page Line Change/Add/Delete

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1 CERTIFICATE OF SHORTHAND REPORTER/STENOGRAPHER

2
3 I, Christa Yan, Certified Shorthand/Stenographic Reporter
4 within and for the State of California do hereby certify:

5 That Dr. Blake Hannaford, the Witness whose deposition is
6 hereinbefore set forth, was duly sworn by me before the
7 commencement of such deposition and that such deposition
8 was taken before me and is a true record of the testimony
9 given by such witness.

10 I further certify that both parties were represented by
11 counsel at the deposition.

12 I further certify that the deposition of Dr. Blake
13 Hannaford, occurred remotely on June 24, 2025, commencing
14 at 9:33 a.m. to 10:52 a.m.

15 I further certify that I am not related to any of the
16 parties to this action by blood or marriage, I am not
17 employed by or an attorney to any of the parties to this
18 action, and that I am in no way interested, financially or
19 otherwise, in the outcome of this matter.

20 IN WITNESS WHEREOF, I have hereunto set my
21 hand this 27th day of June 2025.

22
23
24
25


CERTIFIED SHORTHAND/STENOGRAPHIC REPORTER
IN AND FOR THE STATE OF CALIFORNIA

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