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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioner,

V.

138 EAST LCD ADVANCEMENTS LIMITED,

Patent Owner.

Case No. IPR2024-00958 U.S. Patent No. 8,482,638
Case No. IPR2024-00960 U.S. Patent No. 7,486,807

REMOTE DEPOSITION OF

SAMUEL WU

June 10, 2025 at 11:01 a.m. EST

Reported by: Brooklyn E. Schweitzer, RPR, CRR

Job No.: 587785

Pages: 1 - 23

1 Deposition of SAMUEL WU, conducted
2 virtually.

3
4
5 ** ALL PARTIES ATTENDED REMOTELY. **
6
7

8 Pursuant to Notice, before Brooklyn E.
9 Schweitzer, Registered Professional Reporter,
10 Certified Realtime Reporter, and Notary Public in
11 and for the Commonwealth of Pennsylvania.
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A P P E A R A N C E S

ON BEHALF OF THE PETITIONER:

FINNEGAN, HENDERSON FARABOW, GARRETT &

DUNNER LLP

By: Safiya Aguilar, Esquire

Kevin Rodkey, Esquire

271 17th Street, NW

Suite 1400

Atlanta, Georgia 30363

ON BEHALF OF THE PATENT OWNER:

ROBINS KAPLAN LLP

By: Derrick Carman, Esquire

800 Lasalle Avenue, Suite 2800

Minneapolis, Minnesota 55402

Also Present: Matthew Dennison, Esquire

1	C O N T E N T S		
2	EXAMINATION		PAGE
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7	E X H I B I T S		
8	(All exhibits were previously marked.)		
9	EXHIBIT		PAGE
10	Exhibit 16	Notice of Deposition of	
11		Samuel Wu	
12		IPR2024-00958	10
13	Exhibit 20	Notice of Deposition of	
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16	Exhibit 2002	Japanese Document	
17		IPR2024-00958	12
18	Exhibit 2001	English Translation	
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20	Exhibit 2003	2/13/25 Translation	
21		Certification	
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E X H I B I T S

(All exhibits were previously marked.)

EXHIBIT		PAGE
Exhibit 2003	Japanese Patent	
	IPR2024-00960	17
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	IPR2024-00960	19

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

2 SAMUEL WU,

3 was called, and having been duly sworn,

4 testified as follows:

5 EXAMINATION

6 BY MS. AGUILAR:

7 Q Good morning, Mr. Wu. I'm Safiya Aguilar.
8 I'm counsel for Petitioner, Google LLC, and I'll
9 be taking your deposition today.

10 Will you state your name and title for the
11 record?

12 A My name is Samuel Wu, and my title is
13 managing director of Morningside Translations.

14 Q Thank you. Mr. Wu, you are under oath as
15 if testifying in court and to tell the truth.
16 This testimony is being transcribed, so please
17 answer with verbal responses and not head
18 movements or gestures. Please speak clearly and
19 try not to interrupt because it's easier for the
20 court reporter.

21 If there's anything that prevents you for
22 testifying fully and accurately, will you tell me?

1 A I will.

2 Q Thank you. If you do not understand a
3 question, tell me. If you do not tell me that you
4 do not understand, I will assume that you do
5 understand. Okay?

6 A Understood.

7 Q Okay. Do you understand that you may not
8 speak or communicate with anyone including Patent
9 Owner's counsel about this deposition or your
10 testimony during this deposition including during
11 any breaks we might take?

12 A I do.

13 Q Okay. From time to time, Patent Owner's
14 counsel may object to a question. Do you
15 understand that you must still answer the question
16 even if an objection is made?

17 A I was under the impression that I did not
18 have to answer if there was an objection.

19 Q Okay, Mr. Wu. Thank you for sharing that.
20 You do still have to answer the question even if
21 an objection is made unless Patent Owner's counsel
22 instructs you not to answer the question.

1 A Understood.

2 Q Okay. Any reason you cannot testify
3 accurately and truthfully?

4 A No.

5 Q Okay. If you need a break, let me know.
6 I may finish a line of questioning, and please
7 answer any pending question. We will take a short
8 break following your answer, but we cannot take a
9 break while there's still a question pending.
10 Okay?

11 A Understood.

12 Q All right. This is a remote deposition.
13 Where are you for this deposition?

14 A I am in my home in Brooklyn, New York.

15 Q Okay. Is there anyone else in the room
16 with you?

17 A There is no one in the room with me.

18 Q Okay. If someone enters the room, will
19 you let me know?

20 A I will.

21 Q Thank you. Other than the Zoom program we
22 are using right now for the deposition, do you

1 have any other open programs on your computer?

2 A I do not.

3 Q Okay. Thank you.

4 Will you just confirm that you do not have
5 any email programs open?

6 A It's all minimized. Should I just exit
7 out of it? It's not open on my desktop.

8 Q Please close any email programs that you
9 might have open.

10 A Okay. I will exit.

11 Q As well as any chat or messaging programs
12 you might have open.

13 A Okay.

14 Okay. Everything is closed. Only Zoom is
15 on my desktop.

16 Q Okay. Please confirm that you will not
17 text or message anyone, including Patent Owner or
18 its counsel, through any applications on your
19 phone or other device throughout this deposition.

20 A I confirm.

21 Q Okay. If there are any other programs
22 opened during this deposition, please let me know

1 the program and the reason you're opening it.

2 Okay?

3 A Understood.

4 Q All right. I am about to share two
5 documents in the chat feature of Zoom.

6 First, I am sharing what was previously
7 entered as Exhibit 16 in IPR2024-00958.

8 (Exhibit 16 was previously marked for
9 identification and is attached to the transcript.)

10 Q I'm also entering what was previously
11 Exhibit 20 in IPR2024-00960.

12 (Exhibit 20 was previously marked for
13 identification and is attached to the transcript.)

14 Q Please open them.

15 A So I can download them -- I'm downloading
16 them on the desktop, and opening -- okay. I have
17 the PDF application open on my desktop with the
18 two exhibits.

19 Q Okay. Wonderful. Have you seen these
20 documents before?

21 A These are the notice of deposition -- I
22 have, yes.

1 Q Okay. Is it your understanding, then,
2 that you are here to testify with respect to
3 certain declarations in IPR2024-00956 and
4 IPR2024-00960?

5 A That's correct.

6 Q Okay. Are you prepared to do so today?

7 A I am prepared.

8 Q Okay. Great.

9 You mentioned that your title was managing
10 director over at Morningside. What are your
11 duties as managing director?

12 A So my duties, oversee the language
13 solutions business unit including the operations,
14 including the project managers, as well as our
15 client solutions, which focuses on the quoting and
16 quota entry, as well as the business development
17 strategic management team, and lastly the project
18 management team.

19 Q Okay. Thank you.

20 I'm going to turn now to some documents
21 from IPR2024-00958. First, I am going to share a
22 copy of what was previously marked as Exhibit 2002

1 in that proceeding.

2 (Exhibit 2002 was previously marked for
3 identification and is attached to the transcript.)

4 Q When you receive it, please open it.

5 A Downloading the exhibit now.

6 Okay. Exhibit 2002. I have it open now.

7 Q Thank you. Do you recognize Exhibit 2002?

8 A I don't recognize -- I have not seen this
9 exhibit.

10 Q Okay. Do you recognize the language in
11 this exhibit is written in?

12 A Yes. It is Japanese based on my
13 understanding of the characters. Yes.

14 Q Okay. I'm now going to share Exhibit 2001
15 in proceeding IPR2024-00958.

16 (Exhibit 2001 was previously marked for
17 identification and is attached to the transcript.)

18 Q When you receive it, please open it.

19 A Okay. It is received, and I have opened
20 it.

21 Q Do you recognize this Exhibit 2001?

22 A Yes. It looks to be the translation.

1 Q Okay. Could you expand upon that? What
2 is Exhibit 2001 based upon your recognition of it?

3 A It looks to be the English translation
4 that would have provided by Morningside.

5 Q Okay. English translation of --

6 A The Japanese document in the prior
7 exhibit.

8 Q Okay. Did you prepare this document,
9 Exhibit 2001, the translation?

10 A I did not prepare it.

11 Q Okay.

12 A But my company did.

13 Q Okay. My next question: Do you know who
14 prepared this document?

15 A Yes, I do.

16 Q Okay. Could you please share who prepared
17 this document?

18 A I guess there are two translators that we
19 worked with, as well as an editor, and the PM file
20 review. I would actually have to look at the
21 translation certification to know which of the
22 linguists worked on which document.

1 Q Okay. But sitting here right now, you do
2 not know who translated the document and who
3 prepared the document?

4 A I do not.

5 Q Okay. And then just to confirm, you did
6 not translate this document in Exhibit 2002 into
7 English?

8 A I mean, this translation was completed by
9 my organization, Morningside, and it follows the
10 entire workflow process. Right? So I don't --
11 it's not one individual that completes our
12 translations. It's an entire workflow process
13 that, as an organization, we completed the
14 translation that I'm seeing here.

15 Q Understood, Mr. Wu. I guess my question
16 is you personally did not translate this document?

17 A No.

18 Q Okay. Thank you.

19 I'm now going to share Exhibit 2003 from
20 Proceeding IPR2024-00958.

21 (Exhibit 2003 was previously marked for
22 identification and is attached to the transcript.)

1 Q When you receive it, please open it.

2 A Okay. I have it open.

3 Q Okay. And what is Exhibit 2002?

4 A It is a translation certification on
5 Morningside company letterhead. It's dated
6 February 13th, 2025, and it states the translation
7 of Japanese to English and a list of documents
8 received by Morningside, which is then signed by
9 Oscar Ojeda, who is a project manager of
10 Morningside Translations attesting to the truthful
11 and accurate translation of the specified
12 documents received by our organization and
13 provided to our client.

14 Q Okay. And you said that Mr. Ojeda signed
15 this document?

16 A Correct. It is our company policy to have
17 the project manager, who reports to me, sign
18 translation certifications on the individual
19 projects that they work on.

20 Q Okay. And does Mr. Ojeda, the project
21 manager, speak Japanese?

22 A He does not.

1 Q Okay. Did he translate Exhibit 2002 into
2 English?

3 A He supervised the workflow process for the
4 translations, but he did not translate himself the
5 document.

6 Q Okay. And you mentioned that Mr. Ojeda
7 does not speak Japanese. So Mr. Ojeda would not
8 know if there are inaccuracies in the translation?

9 MR. CARMAN: Object to form.

10 Q Would Mr. Ojeda know if there are
11 inaccuracies in the translation?

12 MR. CARMAN: Object to form, but you can
13 answer.

14 A He -- if there were any inaccuracies, it
15 would reflect to him in the workflow process by
16 either the translator, the reviewer, or during the
17 final PM review which is for completeness. But as
18 far as specific linguistic inaccuracies, I would
19 not believe he would be able to determine that
20 himself.

21 Q Okay. And to confirm, this is because he
22 does not speak Japanese himself?

1 A Correct. He does not speak Japanese.

2 Q Okay. Thank you.

3 I'm going to turn now to IPR2024-00960.

4 All right. I'm going to share a copy of
5 what was previously marked as Exhibit 2003 in
6 Proceeding 2024-00960. Please open it when you
7 receive it.

8 (Exhibit 2003 was previously marked for
9 identification and is attached to the transcript.)

10 A Received. Opening.

11 Okay. I have the open document.

12 Q Okay. Do you recognize this exhibit?

13 A Yes. I recognize it as the source
14 Japanese document in the translation that we
15 provided.

16 Q The Japanese document and the source
17 translation for --

18 A The source -- it looks like the Japanese
19 document that was provided to us for translation.

20 Q Okay. For a translation for a -- which
21 proceeding, then?

22 A It would have been for Japanese to

1 English.

2 Q Okay.

3 I am now going to share with you what was
4 previously marked as Exhibit 2004 in the
5 proceeding IPR2024-00960.

6 (Exhibit 2004 was previously marked for
7 identification and is attached to the transcript.)

8 Q Please open it when you receive it.

9 A Okay. I have the document open.

10 Q Okay. And do you recognize this exhibit?

11 A I do.

12 Q Okay. What is Exhibit 2004?

13 A It looks to be the English translation of
14 the Japanese document in the prior exhibit. That
15 was completed by Morningside Translation.

16 Q Okay. And did you prepare this document?

17 A I did not personally prepare this
18 document.

19 Q Okay. Do you know who prepared this
20 document?

21 A It would have been one of the translators
22 by Morningside, and it would have gone through a

1 review editing step, and then a PM final review, I
2 believe, by Emily Paras, the project manager of
3 Morningside.

4 Q Okay. But just to confirm, you did not
5 translate this document in Exhibit 2003 into
6 English?

7 A I did not.

8 Q Okay.

9 I am now going to share Exhibit 2005 in
10 IPR Proceeding 2024-00960.

11 (Exhibit 2005 was previously marked for
12 identification and is attached to the transcript.)

13 Q Please open it when you receive it.

14 A I have it opened.

15 Q Okay. Do you recognize this exhibit?

16 A I do.

17 Q Okay. And what is Exhibit 2005?

18 A It is a translation certification on
19 Morningside letterhead dated April 9th of the
20 document -- the Japanese publication from Japanese
21 to English, and it is a translation certification
22 signed by Emily Paras, who is a project manager of

1 Morningside Translations.

2 Q Okay. As you mentioned, Ms. Paras signed
3 this as project manager. Does Ms. Paras speak
4 Japanese?

5 A She does not speak Japanese.

6 Q Okay. Did she translate Exhibit 2003 into
7 English?

8 A My understanding is she managed the
9 translation process with the translation editor in
10 the PM final review, but she did not personally
11 translate this document herself.

12 Q Okay. And I'll ask as I did before:
13 Ms. Paras, then, would she know if there are
14 inaccuracies in the translation as she does not
15 speak Japanese?

16 MR. CARMAN: Object to form, but you can
17 answer.

18 A She would only be made aware if it was
19 flagged by the translator or if she noticed
20 incompleteness in the final review, but she is not
21 a native Japanese speaker, so my understanding is
22 that she would not be able to identify errors

1 herself.

2 Q Okay. Understood. Thank you.

3 You know, let's pause for a brief
4 ten-minute break or so. As a reminder, Mr. Wu,
5 you are not permitted to discuss this testimony
6 with anyone including Patent Owner's counsel
7 during the break.

8 MS. AGUILAR: Does that work for you,
9 Counsel?

10 MR. CARMAN: Yep, that's fine.

11 MS. AGUILAR: Okay. Great.

12 (A recess was taken.)

13 MS. AGUILAR: We have no further
14 questions. Thank you for your time, Mr. Wu.

15 THE WITNESS: Thank you very much.

16 MR. CARMAN: I have no questions.

17 (Off the record at 11:29 a.m.)

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ACKNOWLEDGMENT OF DEPONENT

I, SAMUEL WU, 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-NOTARY PUBLIC

2
3 I, Brooklyn E. Schweitzer, the officer
4 before whom the foregoing deposition was taken, do
5 hereby certify that the foregoing transcript is a
6 true and correct record of the testimony given;
7 that said testimony was taken by me
8 stenographically and thereafter reduced to
9 typewriting under my direction; that reading and
10 signing was requested; and that I am neither
11 counsel for, related to, nor employed by any of
12 the parties to this case and have no interest,
13 financial or otherwise, in its outcome.

14 IN WITNESS WHEREOF, I have hereunto set my
15 hand and affixed my notarial seal this 13th day of
16 June, 2025. My commission expires: May 20th,
17 2026.

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19
20 

21 _____
22 Brooklyn E. Schweitzer, RPR, CRR

Transcript of Samuel Wu
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Transcript of Samuel Wu
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