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Transcript of Vladlan Kardashov

Date: November 1, 2024

Case: Reolink Innovation Inc. -v- Throughtek Co., Ltd. (PTAB)

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1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 PATENT TRIAL AND APPEAL BOARD
3
4 Case Type: Civil Patent
5 Court File Number: 23-218-JU-415
6 Case No.: IPR2024-00509
7 - - - - -
8 REOLINK INNOVATION, INC.,
9 Petitioner,
10 v.
11 THROUGHTTEK CO., LTD., et al.,
12 Respondents.
13 - - - - -
14
15 - - - - -
16 HYBRID DEPOSITION OF
17 VLADLAN KARDASHOV
18 - - - - -
19
20 Affiliated Court Reporters
21 6880 River Road
22 Inver Grove Heights, MN 55076
23 612.338.4348
24
25 Taken November 1, 2024 By Deanna Oaks, RPR

Transcript of Vladlan Kardashov
Conducted on November 1, 2024

1 APPEARANCES:

2

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19 For the Respondents

20

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22

23

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Reporter's Certificate:	24

E X H I B I T S

Exhibit	Description
Exhibit 1	Photo Identifying the Lorex Chairman; Ilan Gershon; Vlad Kardashov; and Martin Worndl
Exhibit 2	Exclusivity Agreement

**All exhibits marked after proceedings and
agreed to by counsel.**

Transcript of Vladlan Kardashov
Conducted on November 1, 2024

1 THE DEPOSITION OF VLADLAN KARDASHOV is taken
2 on the 1st of November, 2024, at the offices
3 of Fish & Richardson, 60 South Sixth Street,
4 Suite 3200, Minneapolis, Minnesota, with
5 parties appearing both remotely and in
6 person, commencing at 9:04 A.M.

7
8 VLADLAN KARDASHOV,
9 a witness in the above-entitled
10 action, after having been first duly
11 sworn, deposes and says as follows:

12
13 EXAMINATION

14 MR. KING: Okay. Thank you.

15 BY MR. KING:

16 Q. Mr. Kardashov, have you ever been a witness
17 before? Is this the first time, or you've
18 been a witness before?

19 A. Yes, I've been representing my company -- my
20 previous company --

21 Q. Okay.

22 A. -- as part -- as --

23 (Simultaneous cross talk.)

24 THE WITNESS: As an --

25 ///

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1 BY MR. KING:

2 Q. Okay. All right. So I'll be asking you some
3 questions. If for any part of the question
4 you are not clear, please do wait until I
5 finish my question, and then you can ask for
6 clarification.

7 A. Okay.

8 Q. And some question may be related to or may
9 be -- overlap with your declaration. So
10 please bear with me and just answer the
11 question.

12 A. Okay.

13 Q. Thank you.

14 So for this proceeding, do you
15 receive any compensation for your -- for your
16 time?

17 A. Yes.

18 Q. Okay. Okay. So that's okay. Please
19 provide -- state your educational background.

20 A. Yeah, I'm in electrical engineering.
21 Graduated in Tel Aviv, yeah, and I got a
22 one-year program at the Babson Boston
23 College.

24 Q. Mm-hmm. Mm-hmm. Mm-hmm.

25 A. An MBA.

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1 Q. Okay. Any particular, like, specialty, field
2 in your -- during your study?

3 A. Yes. It was RF and communications.

4 Q. Okay. Communication. All right. So I guess
5 your educational background or professional
6 background -- would you say it's more
7 inclined toward hardware or software related?

8 A. Yeah, so the background is mostly on the
9 hardware side; however --

10 Q. Okay.

11 A. -- since 2005 and '04 potentially, even
12 almost from the beginning, I was mostly in
13 the -- in the software and system design and
14 development. So, you know, it was part of
15 the electrical engineering. You study not
16 only hardware; you study everything,
17 including programming languages, software,
18 and everything else.

19 Q. Yeah, it's come up a lot that you started
20 doing software development during this time.
21 So you personally do involved with software
22 development. So you are familiar with the
23 software?

24 A. I am familiar with software, yes.

25 Q. Yeah, okay. All right. So for the period of

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1 time when you were -- were at Lorex, do you
2 recall when Lorex started?

3 A. Lorex started, I believe, in 1994, maybe '92.
4 I don't remember. I don't --

5 Q. Okay.

6 A. -- know exactly.

7 I joined -- personally, I joined
8 the company around the beginning of 2012.

9 Q. Okay. So -- so you were brought on board as
10 a -- as a director?

11 A. Correct.

12 Q. For -- for the company? So you -- so before
13 that, you were not with the -- with the
14 Lorex? You were just working for direct --
15 directly as director?

16 A. Yeah, not the company director. My title was
17 director of engineering and product
18 development --

19 Q. Okay.

20 A. -- for IP products.

21 Q. Okay. So roughly how many people were Lorex
22 employees at the time? Do -- do you
23 remember? Do you recall? Do you know,
24 roughly?

25 A. When I joined, probably about 70 --

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1 Q. 70 people?

2 A. -- but we were growing rapidly. So probably
3 a year or two years later, we were more than
4 a hundred, a hundred twenty maybe.

5 Q. Okay.

6 A. Yeah, we're growing more than 30, 35 percent
7 a year. So, yeah, we added some staff.

8 Q. Okay. All right. How -- how many people
9 actually directly reports to you or worked
10 for you at the time?

11 A. When I started, there were nobody reporting
12 to me because my goal was to build and
13 establish the product development for IP
14 products and --

15 Q. Okay.

16 A. -- everything related to mobile. After that,
17 after a while --

18 Q. Mm-hmm.

19 A. -- I got, like, some guys reporting to me.

20 Q. Okay. So -- so with that kind of operation,
21 I guess, what was your -- as the title as a
22 director for engineering and product
23 development, can you give -- give us a
24 description for, like, your day -- like, what
25 exactly do you do there?

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1 A. Of course.

2 Q. As a -- yeah.

3 A. Yeah. So in general, when I started -- I
4 will give you some background. When I --

5 Q. Mm-hmm.

6 A. -- started, Lorex was mainly selling analog
7 products -- cameras, DVRs, and -- that were
8 connected by coax cable -- and my goal was to
9 build IP product line, and so Lorex in
10 general was relying on off-the-shelf or
11 almost off-the-shelf solutions.

12 Q. Mm-hmm.

13 A. We back then haven't developed solutions from
14 scratch, including writing the software,
15 hardware, and everything else; so we were
16 finding -- trying to find the best solution
17 that can fit our market needs.

18 Q. Mm-hmm.

19 A. And redesigning, adjusting, adopting it to
20 our market and --

21 Q. Mm-hmm.

22 A. -- including design graphics, adding some
23 components, connectivity, and of course
24 everything related to selling the product in
25 North America and certification --

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1 Q. Mm-hmm.

2 A. -- and everything.

3 Yeah, so back to my day-to-day
4 duties again, in general my goal was to build
5 the IP product line, including wireless Wi-Fi
6 cameras, bring the video to mobile, and --
7 mobile devices and -- yeah. So this is how I
8 started. So --

9 Q. Mm-hmm. Mm-hmm. Mm-hmm.
10 (Simultaneous cross talk.)

11 THE WITNESS: -- very quickly we
12 built a team of -- sorry.

13 BY MR. KING:

14 Q. Go ahead.

15 A. We built a team of QA and design that was
16 reporting to me.

17 Q. Okay. So -- so I guess -- so your job
18 involved more on the development, selection,
19 knowledge, and quality-assurance testing?
20 I'm just trying to get a more clear
21 understanding.

22 A. Yeah. So -- so it mostly -- product
23 development means that --

24 Q. Yes.

25 A. -- finding the right solution for our

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1 company, building on top, adopting the
2 solution, bringing it to the North American
3 market. So I was responsible for market end
4 to end.

5 Q. Okay.

6 A. So there are different structures normally in
7 companies. In Lorex, there was a product
8 owner or a field owner --

9 Q. Mm-hmm.

10 A. -- and that was the owner for the IP product
11 line --

12 Q. Mm-hmm.

13 A. -- and I was responsible end to end for
14 finding the right solution if needed,
15 designing the right solution, and bringing it
16 to the market all the way.

17 Q. Mm-hmm. Okay. So you will be the one
18 involved with the decision on selection of
19 the particular technology protocol?

20 A. Yes, definitely.

21 Q. Yes. And does Lorex has its own
22 manufacturing facility?

23 A. No, Lorex never had, at least in my time, our
24 own manufacturing facilities. We used
25 partners.

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1 Q. Okay. You used partners. All right. So --
2 so for those few who report to you, of -- let
3 me see.

4 So you mentioned that Lorex this
5 time does have its in-house software
6 development team. Is -- is that -- is that
7 what I'm getting?

8 A. Yeah. Yes. We didn't have a firmware
9 development team.

10 Q. Mm-hmm.

11 A. We had -- eventually we brought people to
12 develop the QA, automation, GUI design --

13 Q. Okay.

14 A. -- and for the rest we normally partnered
15 with the other companies.

16 Q. I see, I see, I see. And that's common
17 practice --

18 A. Yeah --

19 (Simultaneous cross talk.)

20 BY MR. KING:

21 Q. Yeah, it's common practice. Even -- even
22 today. Even today, it's still common
23 practice. Yeah.

24 So -- because how many -- did Lorex
25 have a lot of product -- I mean, is the

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1 product line very extensive? Do you
2 personally review each one of them, or you
3 have your staff to review for you? Because I
4 don't know how many products you have at a
5 time.

6 MR. STEPHENS: Objection --
7 (Simultaneous cross talk.)

8 MR. STEPHENS: -- form.

9 MR. KING: Yes?

10 THE WITNESS: So -- okay. I
11 will -- so in general I was responsible for
12 my product line.

13 BY MR. KING:

14 Q. Mm-hmm.

15 A. Of course we had people that -- technical
16 writers that are writing the documents, but I
17 was of course approving -- reading,
18 approving, making adjustments for all the
19 documents --

20 Q. Mm-hmm.

21 A. -- as somebody who is responsible for this
22 product line. We had --

23 Q. Okay.

24 A. -- many products. We had --

25 Q. Mm-hmm.

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1 A. We were selling -- selling more than a
2 million cameras a year, but this was related
3 in different fields. So we had baby
4 monitors, analog products, IP products,
5 et cetera.

6 Q. Mm-hmm. Okay. All right. So when you were
7 at Lorex, do you -- do you recall those
8 few -- there's two particular person. One is
9 called Ilan Gershon; the other one is Martin
10 Worndl, W-O-R-N-D-L?

11 MR. STEPHENS: Objection, Counsel,
12 to the scope of the question. I don't think
13 his testimony depended on -- in this
14 declaration depended on his relationships to
15 particular individuals.

16 MR. KING: Yeah, but those
17 individuals based on the operation of the
18 business and the nature of the business, and
19 I believe the -- the witness has the personal
20 connection with those two individual. So
21 it's not personal relationship, but it's
22 business relationship.

23 MR. STEPHENS: Yeah, I'll maintain
24 my objection to the scope of the question.

25 MR. KING: All right.

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1 MR. STEPHENS: You can answer.

2 THE WITNESS: So, yeah, I know
3 this. They were my colleagues, yeah.

4 BY MR. KING:

5 Q. Did they work for you or --

6 A. No.

7 Q. They don't work for you? I mean, I guess, my
8 question -- do you supervise them, or they --
9 they work on parallel with you?

10 A. So back then, Lorex times -- because --

11 Q. Mm-hmm.

12 A. -- both of them were parallel to me. So they
13 were responsible for --

14 Q. Oh, parallel --

15 (Simultaneous cross talk.)

16 THE WITNESS: -- different things.

17 BY MR. KING:

18 Q. I see. I see. Do -- do you -- do you recall
19 when you were at Lorex -- have you ever been
20 in contact or discuss with Throughtek what
21 any business or potential business
22 relationship or cooperation?

23 MR. STEPHENS: Objection. Form and
24 scope.

25 MR. KING: I think it's direct to

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1 the line we discussed here, and the
2 partnership really relate to the content of
3 the Lorex product which we -- which we --
4 which the team are presenting in the case.

5 MR. STEPHENS: Yeah, and I would
6 just offer -- we have another witness who
7 testified to the contents of the Lorex guide
8 and the Lorex video. Mr. Kardashov's
9 declaration is directed to establishing
10 the -- the means by which those references
11 were published. So that --

12 MR. KING: Mm-hmm. Mm-hmm.
13 Mm-hmm.

14 MR. STEPHENS: -- is, I think, the
15 scope of this declaration.

16 I'll maintain --

17 MR. KING: Well --
18 (Simultaneous cross talk.)

19 MR. STEPHENS: -- my objections to
20 the scope and the form, but the witness can
21 answer the question.

22 THE WITNESS: So I met TUTK in
23 Taiwan in one of my trips to Asia, I
24 believe --

25 ///

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1 BY MR. KING:

2 Q. Okay.

3 A. -- in around -- I don't recall exactly when,
4 but I did meet -- so there were -- I had,
5 like, eight or ten meetings during this trip,
6 and one of them was TUTK. So I remember
7 that.

8 Q. Mm-hmm. Mm-hmm. Mm-hmm. Yeah. Do you
9 recall any cooperation agreement with TUTK?
10 (The reporter asks for clarification.)

11 MR. KING: "Cooperation agreement."

12 MR. STEPHENS: Objection. Scope.

13 THE WITNESS: I don't recall the
14 details of the conversations or any
15 engagements with TUTK back then.

16 BY MR. KING:

17 Q. Okay. You don't recall? All right.

18 A. Yeah, 13 years ago.

19 MR. KING: I understand.
20 Absolutely. I don't mean to -- to -- to put
21 you on the spot. I simply just want to
22 refresh memory.

23 I'd like -- I'd like to present
24 additional exhibit just to refresh the
25 witness memory, which is -- one of them is a

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1 photo taken of the witness looking much more
2 younger in the picture, of course. And --
3 and those are the same time, the -- this
4 agreement with -- between Lorex and TUTK,
5 corporation agreement.

6 So, let's see. Deanna, do you mind
7 put that on the screen?

8 MR. STEPHENS: Counsel, I'll object
9 to the scope of this line of questioning. As
10 you know, the scope of this deposition is
11 limited to the content of the declaration
12 that was put in. I don't see any relevance
13 as to presenting these pictures or
14 establishing these connections. It's beyond
15 the scope.

16 MR. KING: Yes, the connection is
17 that the content of the picture and the
18 content of the agreement shows that TUTK --
19 Throughtek and Lorex has direct partnership
20 during the time in 2012. So -- which is
21 related to the time frame that declaration
22 was related to. So that -- that was
23 relationship, yeah.

24 MR. STEPHENS: We'd like to take
25 ten minutes and -- to discuss how we would

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1 like to proceed.

2 Could we go off the record, please.

3 (A break is taken.)

4 MR. KING: Thank you.

5 MR. STEPHENS: And, Counsel, thank
6 you for sending the two exhibits through the
7 Zoom chat. Just to confirm for the record,
8 we've printed physical copies of those
9 exhibits, and I've presented them to
10 Mr. Kardashov.

11 MR. KING: Thank you.

12 MR. STEPHENS: We'll maintain our
13 objection, as I mentioned before the break,
14 to the scope and relevance of this line of
15 questioning and the contents of these
16 exhibits, but you may proceed with your
17 questions.

18 MR. KING: Okay. All right.

19 BY MR. KING:

20 Q. Mr. Kardashov, as the -- currently you are
21 the CEO of the iENSO company -- Inc.?

22 A. I'm the president of iENSO, yes.

23 Q. Did you start this company?

24 A. No, I didn't. I joined this company about --

25 Q. Okay.

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1 A. -- four years ago.

2 Q. Okay. As your current position, do you have
3 any business relationship or potential
4 business relationship with Reolink?

5 A. No.

6 Q. Okay. Okay. Okay. Last question.

7 For the declaration that you
8 executed, was that declaration drafted
9 directly by you?

10 A. I'm sorry, I didn't --
11 (Simultaneous cross talk.)

12 BY MR. KING:

13 Q. -- by you?

14 The declaration, was that directly
15 drafted by you or initiated by you?

16 A. So the declaration was teamwork with Nicholas
17 and the guys, and I read and approved it
18 before I signed.

19 MR. KING: Okay. Thank you. No
20 more questions.

21 MR. STEPHENS: No further
22 questions.

23 (The reporter inquires about the option to
24 read and sign the transcript.)

25 MR. STEPHENS: I'm sorry?

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1 (The reporter inquires about the option to
2 read and sign the transcript.)

3 MR. STEPHENS: Yes.

4 (The reporter requests transcript order
5 details.)

6 MR. KING: PDF is fine. Thank you.

7 MR. STEPHENS: We don't require a
8 copy. Thank you.

9 (The deposition is adjourned at 9:36 A.M.)

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1	ERRATA SHEET		
2	Page/Ln	Correction	Reason
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1 I, VLADLAN KARDASHOV, have read this
2 deposition transcript, pages 1-21, and
3 acknowledge herein its accuracy except as
4 noted on the errata sheet.

5

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Signature

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1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2

3 I, Deanna Oaks, Certified Reporter and
4 Notary Public within and for the County of
5 Hennepin, State of Minnesota do hereby certify:

6

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

13

14 I further certify that the adverse party,
15 THROUGHTTEK CO., LTD., was represented by counsel
16 at the deposition.

17

18 I further certify that the deposition of
19 Vladlan Kardashov, occurred at the offices
20 of Fish & Richardson, 60 South Sixth Street,
21 Suite 3200, Minneapolis, Minnesota on Friday,
22 November 1, 2024, commencing at 9:04 a.m. to
23 9:36 a.m.

24

25

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1 I further certify that I am not related to
2 any of the parties to this action by blood or
3 marriage, I am not employed by or an attorney to
4 any of the parties to this action, and that I am
5 in no way interested, financially or otherwise,
6 in the outcome of this matter.

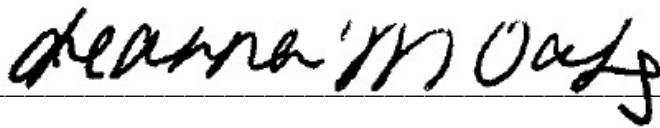
7

8 IN WITNESS WHEREOF, I have hereunto set my
9 hand this 13th day of November, 2024.

10

11

12

A handwritten signature in black ink, appearing to read "Deanna M. Oaks", is written over a horizontal line.

13

Deanna Oaks, RPR

14

Secretary of STAR -- Stenograph

15

Technology Agencies Reporters

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