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

REOLINK INNOVATION INC. AND SHENZHEN)
REOLINK TECHNOLOGY CO., LTD.,)
) CASE IPR2024-00509
PETITIONER,) PATENT RE47,842
)
v.)
)
THROUGHTEK CO., LTD.,)
)
PATENT OWNER.)

)

DEPOSITION OF YU-LI KAO
FRIDAY, FEBRUARY 21, 2025
10:03 A.M. PST
REDWOOD CITY, CALIFORNIA

REPORTED BY AUDRA E. CRAMER, CSR NO. 9901

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1 DEPOSITION OF YU-LI KAO, TAKEN ON BEHALF OF
2 THE PETITIONER AT 500 ARGUELLO STREET, SUITE 400,
3 REDWOOD CITY, CALIFORNIA, ON FRIDAY, FEBRUARY 21, 2025,
4 AT 10:03 A.M. PST, BEFORE AUDRA E. CRAMER, CSR NO. 9901,
5 PURSUANT TO NOTICE.

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1 I N D E X

2 WITNESS

3 YU-LI KAO

4

5 EXAMINATION PAGE

6 MS. SUN 6

7 (P.M. SESSION) 56

8 BY MR. KING 85

9

10 E X H I B I T S

11 NO. PAGE DESCRIPTION

12 Kao 1 16 US RE47,842, REOLINK 1002

13 Kao 2 35 DECLARATION OF YU-LI KAO

14 THROUTHTEK 2005

15 Kao 3 43 DECLARATION OF YEN-KUANG

16 CHEN

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1 REDWOOD CITY, CALIFORNIA
2 FRIDAY, FEBRUARY 21, 2025, 10:03 A.M. PST
3
4 (Whereupon KASIE CHEUNG was
5 duly sworn as Mandarin/English
6 interpreter.)
7

8 YU-LI KAO,
9 having been first duly sworn, was
10 examined and testified as follows:
11

12 EXAMINATION

13 BY MS. SUN:

14 Q. Good morning. This is Menglin Sun, and
15 I'm here representing the petitioner,
16 Reolink Innovation and Shenzhen Reolink
17 Technology Co., Limited. Along with me is my
18 colleague, Jessica Wang and Mr. David Barkan,
19 who will be joining us later in the day.

20 Please state your name for the record.

21 A. In Chinese?
22

1 Q. Yes. We just need to have English...

2 A. Yu-Li Kao.

3 Q. Please provide a business address for
4 the record.

5 A. In Taiwan?

6 Q. Yes.

7 A. I need to get my business card.

8 The business card of Mr. Kao business
9 address shows No. 20-3 -- I'm sorry. 24-3,
10 No. 506, Chung Hsiao East Road, Section 5,
11 Xin Yi Region District, Type A.

12 Q. Mr. Kao, do you understand why you are
13 here today?

14 A. Yes.

15 Q. What's your understanding for your
16 responsibilities today?

17 A. Could you be more specific with your
18 question?

19 Q. What's your understanding about why
20 you're here today?

21 A. My understanding is there's a company
22 claiming that our patent is invalid, and

1 therefore I'm here to testify.

2 Q. That is correct. And more
3 specifically, you're here because you submitted
4 a declaration in this case in support of
5 Thoroughtek's response to Reolink's IPR
6 petition, and therefore we're entitled to ask
7 questions regarding your declaration to ensure
8 that our understanding for your answers in your
9 declaration is correct.

10 A. Yes.

11 Q. Have you been deposed before?

12 A. No.

13 Q. So before we dive into the substance of
14 my questions, I will lay out some ground rules.
15 Okay?

16 A. Okay.

17 Q. Do you understand that you have given
18 an oath to testify here today?

19 A. Yes.

20 Q. And that means you will tell the truth,
21 the whole truth and nothing but the truth;
22 correct?

1 A. Yes.

2 Q. And you agree to do that today?

3 A. Yes.

4 Q. You understand that this is the same
5 oath that you would take if we were actually in
6 front of the Patent Trial and Appeal Board
7 judge; correct?

8 A. Yes.

9 Q. If you don't understand a question I
10 ask, would you please let me know?

11 A. Yes.

12 Q. So if you don't ask me to clarify my
13 question, is it fair to assume that you
14 understood my question?

15 A. Yes.

16 Q. Along those same lines, today's not
17 meant to be a memory test. So if later in the
18 deposition you realize that you need to go back
19 to clarify, amend, take back, change any of the
20 answers that you had given earlier, if you would
21 just let me know, I will give you the
22 opportunity to do that. Okay?

1 A. Okay.

2 Q. Because the goal here is to get your
3 best and most accurate testimony today; correct?

4 A. Okay.

5 Q. Now, there will be times in the
6 deposition where your counsel will make an
7 objection. He is doing that for the record.
8 Unless he specifically instructs you not to
9 answer a question, you should answer, even
10 though your counsel has made objection.

11 Do you understand that?

12 A. I understand.

13 Q. We will take breaks from time to time,
14 approximately every hour or so, but if you would
15 like to take a break at any point, please let me
16 know, and I will let you do that. Okay?

17 A. Yes.

18 Q. But if I've just asked you a question,
19 I will ask you to finish answering my question
20 first, and then we will take the break. Okay?
21 Do you understand?

22 A. I understand.

1 Q. Finally, when the deposition ends, you
2 will have the opportunity to review the
3 transcript and make any amendments or
4 clarifications that you believe that you will
5 need to make.

6 Do you understand that?

7 A. I understand.

8 Q. Is there any reason that you can't
9 provide your best, most accurate testimony here
10 today?

11 A. No.

12 Q. Are there any medical conditions that
13 are impacting your ability to testify?

14 A. Well, I just flew in yesterday, so I am
15 jet-lagged, so I may not be in my best
16 condition.

17 Q. Understood. But you still can make the
18 best and most accurate testimony here today;
19 correct?

20 A. Yes.

21 Q. Anything else that's impacting your
22 ability to testify?

1 A. No.

2 Q. If that ever changes during this
3 deposition, will you tell me?

4 A. Okay.

5 Q. Now, how long did you spend preparing
6 for this deposition?

7 A. Starting when?

8 Q. Starting when you started preparing for
9 this deposition.

10 A. I learned about this deposition while I
11 was in Taiwan, and I did review some of my
12 previous documents, emails. I should say that I
13 didn't have time to have many discussions with
14 them.

15 Q. When did you start preparing for this
16 deposition?

17 A. Strictly speaking, I haven't really
18 done any preparation.

19 Q. Okay. Did you meet anyone in
20 preparation for this deposition?

21 A. Yes. In Taiwan, I have talked with
22 Charles who informed me about the deposition.

1 Q. When was that?

2 A. Several days ago. I'm not exactly sure
3 which day. That was when I'm preparing to come
4 here.

5 Q. For how long?

6 A. He only told me about today's
7 deposition, and that I should tell the truth
8 about what I did back then.

9 Q. Now, besides Mr. Charles, who else was
10 present during that meeting?

11 A. No. Just us.

12 Q. Do you know whether Mr. Charles is a
13 registered US attorney?

14 A. Charles?

15 Q. Yes.

16 A. No, I don't know.

17 Q. Did you discuss anything substantively
18 about this deposition during this meeting with
19 Mr. Charles?

20 A. No. He simply told me to tell the
21 truth about what I did at that time --
22 everything I did at that time.

1 Q. Nothing else?

2 A. No.

3 Q. Did you review any documents in
4 preparation for this deposition?

5 A. Not really any documents.

6 Q. Did you review your declaration in
7 preparation for this deposition?

8 A. I did.

9 Q. How long did you spend reviewing your
10 declaration?

11 A. I wrote the declaration, so when you
12 said "read my declaration," I found it a little
13 bit odd.

14 Q. Okay. We'll come back to that question
15 later. Let me move on.

16 Is there anything else you did to
17 prepare for this deposition other than review
18 your declaration and have that short
19 conversation with Mr. Charles?

20 A. In my declaration, it indicated that
21 the two other gentlemen who have knowledge about
22 this case, I did review their document.

1 Q. Who are those two people that you just
2 mentioned?

3 A. I forgot their names. They are being
4 included in my declaration.

5 Q. When did you review their documents?

6 A. Before I came to the states.

7 Q. So this is a translated deposition.
8 How would you describe your proficiency in
9 English in general?

10 A. I'm fine with daily conversations in
11 English, but for these type of specific
12 meetings, especially may involve some legal
13 jargons, that I am not comfortable with.

14 Q. Is it fair to say that you can read
15 English?

16 A. What kind of English?

17 Q. For example, the language you use in
18 your product.

19 A. I basically wrote my patent in Chinese,
20 and then it was translated for me into English.

21 Q. Okay. We'll also come back to that
22 later.

1 Is it fair to say that you can use
2 English in your daily conversations?

3 A. Yes.

4 Q. Can you write in English?

5 A. Same. Daily conversation stuff.

6 Q. Can you understand me when I'm speaking
7 English right now?

8 A. So far, yes.

9 MS. SUN: Now I'm going to hand you
10 Exhibit 1.

11 (Whereupon, Kao 1 was marked
12 for identification.)

13 BY MS. SUN:

14 Q. So, Mr. Kao, please take your time to
15 briefly review the document and let me know if
16 you recognize this document.

17 A. Yes. This is the patent that I
18 participated in.

19 Q. What do you mean by you "participated"?

20 A. This is the patent I invented.

21 Q. I'll represent to you that this is also
22 the patent that's in the current IPR case.

1 A. I understand.

2 Q. The patent number is US RE47842, which
3 I'll refer afterwards as the '842 patent. Okay?

4 A. Yes.

5 Q. Now, let me direct your attention to
6 row 72 on the first page.

7 A. Where is that?

8 Q. It's on the first page, the last
9 column.

10 A. Okay.

11 Q. Now, row 72 lists the inventors, and
12 the second name inventor is "Yu-Li Kao," which
13 is you; correct?

14 A. Yes.

15 Q. Were you involved in drafting the
16 '842 patent?

17 A. Yes.

18 Q. Did you write -- did you draft the
19 patent in Mandarin?

20 A. I believe -- actually, I was just
21 dictating it to a company who specialized in
22 drafting patent documents.

1 Q. When was the last time you reviewed the
2 patent?

3 A. Also before I came here.

4 Q. So I understand that you flew to the
5 United States on Thursday, so when exactly did
6 you review the patent?

7 A. I forgot.

8 Q. Is it in this week?

9 A. I'm not sure the exact date.

10 Q. Well, I'm not asking you about the
11 exact date. I'm just asking you whether you
12 reviewed the patent in this week?

13 A. I should say that within this or last
14 week.

15 Q. So is it fair to say that the substance
16 of the '842 patent is still fresh in your mind?

17 A. Yes.

18 Q. Did you review the patent in English?

19 A. Yes. I only have this version.

20 Q. And you were able to understand the
21 '842 patent in English; correct?

22 A. Originally, this patent was also in

1 Chinese, so as far as my memory goes, I was just
2 reading briefly of this English version. I did
3 not read it word for word.

4 Q. That's fair.

5 Is it fair to say that as the named
6 inventor, you're familiar with the technology
7 introduced in the '842 patent as well as the
8 field of invention in general?

9 A. Yes.

10 Q. So for the time sake, I will not ask
11 you to review the entire patent, especially in
12 view that you have reviewed the patent quite
13 recently, but please briefly read the abstract
14 as well as Claim 1.

15 A. You want me to read it out loud?

16 Q. No. Just read it to yourself and let
17 me know when you finish.

18 A. It's a little bit difficult for me to
19 read this in English, so perhaps you could just
20 ask me questions directly.

21 Q. Okay. Are you familiar with the P2P
22 connection introduced in the patent?

1 A. Yes.

2 Q. You're also familiar with the hole
3 puncture technique?

4 A. Yes.

5 Q. Also image recognition technique?

6 A. Yes.

7 Q. Is it fair to say that you were
8 familiar with those terms in English?

9 A. Yes.

10 Q. Who came up with the idea for the
11 '842 patent?

12 A. I did.

13 Q. When did you come up with the idea?

14 A. It was long, long time ago.

15 Q. Could you give me an estimate?

16 A. I think that would have been a year or
17 two prior to the application of the patent.

18 Q. Do you remember when you filed the
19 application?

20 A. It says on the document.

21 Q. Are you referring to row 64, which says
22 the filed time was July 25, 2013?

1 A. Yes. Correct.

2 Q. So is it fair to say that you came up
3 with the idea in around 2011 or 2012?

4 A. Yes.

5 Q. What's your contribution to the patent?

6 A. Can you be more clear? Which part
7 about the contribution?

8 Q. So is the entire patented invention in
9 the '842 patent coming entirely from you?

10 A. I came up with the idea, and I had
11 discussions with other inventors.

12 Q. So is it fair to say that you came up
13 with the idea first, and then followed up with
14 other inventors?

15 A. Yes.

16 Q. Now, I just asked you some questions
17 regarding some of the techniques in the
18 '842 patent, such as P2P connection, hole
19 puncture technique and image recognition
20 technique.

21 Do you remember that?

22 A. Yes.

1 Q. Did you develop the P2P connection
2 yourself?

3 A. How do you define "develop"?

4 Q. Well, the '842 patent has several
5 characteristics. One of those are the P2P
6 connection.

7 A. Yes.

8 Q. And you testified that you came up with
9 the idea embodied in the '842 patent; correct?

10 A. Yes.

11 Q. Is it one of your contributions to
12 develop the P2P connection?

13 A. Okay. When you said "develop," I
14 should say that I was not the one who wrote all
15 the subsequent software procedures. It was done
16 by people in my company, but the idea came from
17 me.

18 Q. Can you specify what idea you're
19 talking about?

20 A. First of all, in terms of P2P
21 connection, it enabled our clients or enabled
22 customers to have the connection without a lot

1 of network setup.

2 So in terms of image recognition
3 technique, it would enable the user just to scan
4 the QR code without needing to input too much of
5 the identification information.

6 And then eventually I discovered that
7 simply by scanning the QR code, it can set up
8 the connection itself, so that was a very
9 significant or very great invention.

10 Q. So did you event the P2P connection?

11 A. No.

12 Q. Did you invent the image recognition
13 technique?

14 A. No.

15 Q. So is it fair to say that the idea that
16 you had is combining the P2P connection with
17 image recognition?

18 A. Yes.

19 Q. Why do you think that idea is new?

20 A. Because I had never seen that usage
21 before.

22 Q. Did you or ThroughTek ever research

1 other publications or patents or products in the
2 market to see whether the idea was actually new?

3 A. At the time we received a lot of
4 feedback from our customers wanting to have a
5 better connection method. Therefore, I came up
6 with the idea to satisfy customers' requirement.

7 So to be more correct, to answer your
8 question, we did not conduct research in the
9 market for products in that regard, and it was
10 also because I had never seen any products in
11 the market which include that method.

12 Q. So is it fair to say that you did not
13 actually know whether the idea was new, or your
14 information came from your customers' requests?

15 A. I think based on my customers'
16 requests, that reflect what the market situation
17 was also reflected, if there was product prior
18 to my idea.

19 Q. Well, there's also the possibility that
20 there is something similar in the market, but
21 it's just because your customers did not know;
22 correct?

1 A. I'm not sure.

2 Q. How much time did you or ThroughTek
3 spend in converting your initial thought into
4 the claimed invention in the '842 patent?

5 A. Maybe several months.

6 Q. Well, you testified that you have
7 initially thought one or two years prior to
8 filing the '842 patent; correct?

9 A. Yes.

10 Q. But you also testified that you only
11 spent several months in actually converting your
12 thoughts into the claimed invention in the
13 patent; correct?

14 A. All initial ideas would be converted
15 into some -- a product for testing, and,
16 subsequently, it took much longer time in order
17 to optimize the product.

18 Q. Is it fair to say that your initial
19 thoughts back in 2011 or 2012 is different from
20 what's actually in the '842 patent?

21 A. In terms of the functionality, they are
22 the same, but as I indicated earlier, we did

1 spend time to have a better -- to optimize the
2 product.

3 Q. How did you optimize the product?

4 A. So there are two parts. With the
5 QR code scanning, it was unstable initially, so
6 the optimization was to make it more stable, so
7 the second part is for the P2P connection, which
8 was a very complex process.

9 It depends on the variance of the
10 network variation, so the optimization for P2P
11 connection is also to make it more reliable.

12 Q. Are those optimizations that you just
13 talked about somehow embodied in the
14 '842 patent?

15 MR. KING: Objection. I think this has
16 something to do with the scope of the claim.
17 There's a legal definition.

18 MS. SUN: Are you claiming
19 attorney-client privilege over this?

20 MR. KING: I just don't think the
21 question is fair for asking a legal question
22 because right here you ask the witness to define

1 what's been claimed, and we're talking about
2 construction here.

3 Perhaps Counsel can rephrase the
4 question differently.

5 MS. SUN: Well, I'm not asking anything
6 about a legal definition. I'm only asking
7 Mr. Kao about his own invention, as laid out in
8 the '842 patent.

9 THE WITNESS: I think your question is
10 broad. If you can specify, it may be easier for
11 me to answer.

12 BY MS. SUN:

13 Q. I was just using your own word of
14 "optimization." You talk about two types of
15 optimization that you made to your initial
16 thought.

17 And I'm asking whether those
18 optimizations were eventually made into the
19 '842 patent.

20 A. I'm still not sure about your question.
21 I think it's still too broad.

22 Q. Well, is the '842 patent covering your

1 initial thoughts only or also the optimization
2 that you just talked about?

3 A. I don't remember.

4 Q. Now, you mentioned something related to
5 the network variation as one of the
6 optimizations that you made; correct?

7 A. Yes.

8 Q. What is that specifically?

9 A. Well, this will be a long narrative to
10 answer that question. Do you want me to tell
11 you that?

12 Q. Sure. Go ahead.

13 A. Okay. So, first off, in order to
14 establish the point to point connection on
15 Internet, we first had to develop the port
16 mapping on the router.

17 And so when you need to connect the far
18 point, whether it's a smartphone or laptop, onto
19 the router, you need to use the IP address,
20 which is the floating IP address. Therefore,
21 you have to have a server to handle the floating
22 IP address to make it a command.

1 And, therefore, then you can enable the
2 far-end devices, whether it's smartphone or
3 computer, to be connected to the devices behind
4 the router, which is what we've been talking
5 about -- so what we've been talking about the
6 IP cam.

7 The traditional connection method for
8 the far-end devices to be connected to the IP
9 cam, required a lot of network setup, so the
10 biggest merit for P2P connection is to connect
11 the devices without these setup.

12 So it also enable a direct connection
13 between a smartphone to the IP cam without
14 Internet connection.

15 Is this sufficient, or do you want me
16 to continue?

17 Q. I think that's enough.

18 Is it fair to say that everything you
19 just discussed about network variation is
20 related to the P2P connection?

21 A. We are not even there yet.

22 So the network variation refers to the

1 router type between the PC or smartphone router
2 and the IP cam router. So these different
3 routers cause the variation of the network.

4 Okay? And when you connect the
5 wireless phone online, its router also has a lot
6 of variations. So these different type of
7 routers cause many variations of the network.

8 So the optimization I was talking about
9 would enable the P2P connection to be successful
10 under these various network changes.

11 MR. KING: Counsel, we would like to
12 request for a break. It's been an hour.

13 MS. SUN: That's fine. We've been
14 going for an hour or so.

15 (Recess taken.)

16 BY MS. SUN:

17 Q. Mr. Kao, welcome back.

18 During the break, did you talk about
19 any substance of your deposition with any of
20 your counsel?

21 A. We only talked about wine tasting, that
22 kind of thing.

1 Q. Okay. So fair to assume that nothing
2 related to the substance of the depo?

3 A. We also talked about how nice a setting
4 this is.

5 Q. Thank you. Now, before we took the
6 break, you discussed -- you gave a long answer
7 about the optimization you made to the previous
8 method for establishing the P2P connection.

9 A. Yes.

10 Q. Now, let me just clarify the answer I
11 got from you.

12 Is the optimization that you talked
13 about, optimizations to the P2P connection
14 itself, or is it about using the P2P connection
15 to optimize the current process of establishing
16 network connections between the PC and the IP
17 router?

18 A. I was mainly talking about the success
19 rate, to optimize the success rate for the P2P
20 connection, because there was existing issue
21 with P2P connection, and, therefore, oftentimes
22 the connection will be unsuccessful, and

1 therefore we came up with the optimize process.

2 Q. So your answer to my question is that
3 the optimization you talked about is the
4 optimization to the P2P connection; correct?

5 A. Yes.

6 Q. Now, I remember you probably said that
7 you do not remember, but I just want to confirm
8 that. Do you know whether the optimization to
9 the P2P connection is also in the '842 patent?

10 A. Well, could you be more clear what your
11 question is? For instance, could you ask me if
12 any portion in the '842 patent has anything to
13 do with the optimization progress?

14 Q. That is my question. So thank you for
15 clarifying that.

16 A. No. What I would like to understand
17 is, if you could ask me questions that which
18 specific point in the '842 patent is related to
19 what I just talked about?

20 Q. Well, I'm just asking generally about
21 whether the '842 patent includes any of the
22 optimization you just talked about.

1 A. Your question is too broad. I am not
2 able to answer.

3 Q. So what exactly did you do to optimize
4 the P2P connection to make it more stable?

5 A. Well, what I just talked about of the
6 optimization process was based on theory, but in
7 order to actually implement it, there were a lot
8 of experiments involved. When we talk about P2P
9 connection, we earlier talked about the various
10 network changes.

11 So what we needed to do was assign a
12 port number in order for the devices including
13 cell phone and PC router to be connected to the
14 device router and specifically for the IP cam
15 behind it.

16 So during the connection, the port
17 number on each side of the router could have a
18 lot of variation, so we needed to figure out the
19 correct port number in order to stabilize the
20 P2P connection.

21 And because they are different type of
22 routers, and so it can cause different port

1 numbers output. So after a long period of
2 experimenting, we were able to figure out the
3 port number, even though it could have a lot of
4 variations, but with our effort, we were able to
5 get the port number, regardless, to enable the
6 success of the P2P connection.

7 This is my explanation about the
8 optimization method.

9 Q. So you testified earlier during this
10 deposition that you did not invent the P2P
11 connection; correct?

12 A. Correct.

13 Q. But you invented the optimization to
14 the P2P connection; correct?

15 A. So at the time we learn about P2P
16 connection in textbook, we didn't know if
17 anybody was actually utilizing P2P connections
18 in reality.

19 Q. Thank you for your answer, but that's
20 not my question. My question is, did you invent
21 the optimization you just discussed to the P2P
22 connection?

1 A. To be straight, that optimization of
2 the connection itself is not an invention. It
3 is just a method to make the products better.

4 Q. So your answer to my question would be,
5 "No, I did not invent optimization to the P2P
6 connection"; correct?

7 A. You can say that.

8 MS. SUN: I'm going to mark this
9 Exhibit Kao 2.

10 (Whereupon, Kao 2 was marked
11 for identification.)

12 BY MS. SUN:

13 Q. Now, Mr. Kao, please briefly review the
14 document, and let me know when you finish.

15 A. I'm done.

16 Q. Do you recognize this document?

17 A. Yes, I do.

18 Q. What is it?

19 A. It's my declaration.

20 Q. When did you prepare this declaration?

21 A. Before I came to the states.

22 Q. So you drafted the declaration

1 immediately before you came to the
2 United States?

3 A. Yes.

4 Q. Do you know when it was?

5 A. Took me a little time to get it done,
6 but I cannot say for sure which date.

7 Q. You can just give me your best
8 estimate. Was it last week? Last month?

9 MR. KING: Objection. There is a
10 signature date on this declaration. I don't see
11 the reference for this question.

12 THE WITNESS: Within the past one or
13 two weeks.

14 BY MS. SUN:

15 Q. Well, speaking of signature, Mr. Kao,
16 let's turn to page 8 of your declaration. And
17 the date on the declaration is November 15,
18 2024; correct?

19 A. So before I came here, there was an
20 amendment.

21 Q. Do you remember what you changed to
22 your declaration?

1 A. I don't recall, but not a big revision.

2 Q. So let's turn back to this version of
3 your declaration dated November 15, 2024. Okay?

4 A. Okay.

5 Q. And when we go through your
6 declaration -- this version of your declaration,
7 if there is anything changed from last time,
8 please let me know. Okay?

9 A. Yes.

10 Q. So this version of your declaration was
11 signed by you on November 15, 2024; correct?

12 A. Yes.

13 Q. Do you remember when you prepared this
14 declaration?

15 A. It has to be prior to my signing the
16 declaration.

17 Q. October 2024?

18 A. I am not able to recall. I only know
19 that when it was finalized, I signed it.

20 Q. Okay. Did you prepare the declaration
21 yourself?

22 A. After I drafted it, I had discussions

1 with Charles.

2 Q. Did you draft the declaration in
3 Mandarin or in English?

4 A. In Chinese.

5 Q. Who did the translation for you?

6 A. I actually don't remember who did the
7 translation.

8 Q. And you mentioned that you had
9 discussions with other people regarding your
10 declaration, including Mr. Charles. Is there
11 anyone else who helped you in drafting the
12 declaration?

13 A. No.

14 Q. Did you review your declaration before
15 signing your name on it?

16 A. Yes.

17 Q. Did you review your declaration in
18 English?

19 A. Yes. But I could only understand the
20 brief content.

21 Q. Okay. Let's go to paragraph 37, which
22 is on page 8 of your declaration.

1 And the first sentence in paragraph 37
2 starts with, "I hereby declare that all
3 statements made are of my own knowledge, are
4 true, and that all statements made on
5 information and belief are believed to be true."

6 Correct?

7 A. Yes.

8 Q. Is that still your understanding for
9 the accuracy for your declaration?

10 A. Yes.

11 Q. How did you make sure that everything,
12 even though they are written in English, are
13 accurate and true?

14 A. I was able to consult the dictionary.

15 Q. Did you use a dictionary to translate
16 your English declaration to Mandarin before you
17 signed your name?

18 A. Well, I could use Google to do that.

19 Q. All right. So if I ask you some of the
20 terms you used in the declaration in English,
21 will you be able to understand their meaning?

22 A. I can try.

1 Q. Okay. And you mentioned that you
2 reviewed your declaration before you flew here
3 on Thursday; correct?

4 A. Yes.

5 Q. How long did you spend reviewing your
6 declaration?

7 A. A few hours.

8 Q. And that included the translating time
9 between Mandarin and English?

10 A. Yes.

11 Q. How much time did you spend drafting
12 the declaration?

13 A. A few days.

14 Q. Now, I understand that your counsel
15 mentioned that you have submitted a corrected or
16 revised version of your declaration. Is there
17 any reason to doubt the accuracy of any of the
18 statements in your current declaration?

19 A. No. Because I only implement some
20 opinions of this current declaration. I did not
21 delete any content from this version of the
22 declaration. And, besides, I've signed this

1 declaration, so it's accurate.

2 Q. Understood.

3 So let's turn back to page 1 of your
4 declaration. So paragraphs 1 through 3 briefly
5 discuss your education and professional career;
6 correct?

7 A. Let me take a quick look.

8 Q. Take your time.

9 A. Okay.

10 Q. So in paragraph 3 you stated that, "In
11 2008 I co-found the ThroughTek"; correct?

12 A. Yes.

13 Q. Do you know how many patents ThroughTek
14 has?

15 A. What's the timeframe?

16 Q. At all times.

17 A. So current time?

18 Q. Well, let's start with the current
19 number of patents ThroughTek has.

20 A. I'm not certain currently because I
21 have already left the company.

22 Q. Why did you leave the company?

1 A. It's my personal life goal.

2 Q. Was it before or after Reolink filed
3 the IPR petition?

4 A. I don't remember the date when I left
5 the company, but that would have been at least
6 five years ago.

7 Q. So right now you're not affiliated with
8 ThroughTek anymore; correct?

9 A. Correct.

10 Q. How many patents do you have as a named
11 inventor?

12 A. During the time I work for ThroughTek
13 or others as well?

14 Q. Including every patent that has you as
15 a named inventor.

16 A. Between 10 to 20.

17 Q. Are those US patents or patents for
18 other countries?

19 A. Would also include other countries.

20 Q. What's the general substance of your
21 other patents?

22 A. For the most part, they are all related

1 to technology.

2 Q. What type of technology?

3 A. I don't have my laptop in front of me,
4 so it's hard for me to answer that. And,
5 besides, I don't think that has a lot of
6 relevance to this case.

7 MS. SUN: Understood.

8 I'm going to hand you Exhibit Kao 3.

9 (Whereupon, Kao 3 was marked
10 for identification.)

11 BY MS. SUN:

12 Q. Again, Mr. Kao, please briefly review
13 Exhibit 3, which is pretty short, and let me
14 know when you finish.

15 A. Okay. I'm done.

16 Q. Do you recognize this document?

17 A. I am not familiar with it. I have not
18 seen this before.

19 Q. That's fine.

20 Can you take a look at the first page
21 of the declaration. In the middle of the page
22 it starts with "I, Yen-Kuang Chen, PhD, declare

1 that."

2 A. Yes.

3 Q. Do you know Dr. Chen?

4 A. I have heard of him. I don't quite
5 recall who he is.

6 Q. Do you know the relationship between
7 ThroughTek and Dr. Chen?

8 A. I am not.

9 Q. Have you personally interacted with
10 Dr. Chen?

11 A. I might have met him in some public
12 gatherings, but I do not have any personal
13 interaction with him.

14 Q. And no interaction with Dr. Chen
15 related to this case; correct?

16 A. Correct.

17 Q. So it will also be true that you've
18 never had a discussion with Dr. Chen regarding
19 his declaration; correct?

20 A. Correct.

21 Q. And you also have never had
22 conversation with Dr. Chen regarding your

1 declaration; correct?

2 A. Correct.

3 Q. And you've never read this declaration
4 before; correct?

5 A. Correct.

6 Q. Now, let's leave Dr. Chen's declaration
7 for a moment, and let's return to your
8 declaration. Let's start with paragraph 4 on
9 page 1 of your declaration. Paragraph 4
10 recites, "P2P and the hole puncture technique by
11 themselves are not new per se in the industry at
12 the time when the '842 patent's earliest
13 application was filed"; correct?

14 A. Correct.

15 Q. What "industry" are you referring to
16 here?

17 A. It's in our surveillance industry.

18 Q. Is the '842 patent also related or in
19 the surveillance industry?

20 A. While we were preparing the
21 '842 patent, we were not limiting ourself to the
22 surveillance industry.

1 Q. But the claimed invention in the
2 '842 patent can you used in the surveillance
3 industry; correct?

4 A. Yes.

5 Q. What do you mean by "those techniques
6 are not by themselves new per se"?

7 A. As I stated earlier, you could read
8 about these techniques in textbooks, but you did
9 not see the techniques being utilized in any
10 actual products.

11 Q. So is it your testimony that before the
12 '842 patents, nobody in the industry had ever
13 used P2P connections in actual products?

14 A. I can only say that that's my
15 understanding.

16 Q. Okay. So what's the difference between
17 the term "by themselves not new" and "by
18 themselves not new per se"? Why did you add the
19 term "per se"?

20 A. I don't see the difference.

21 Q. What's your understanding of the
22 English term "per se"?

1 A. It's per se.

2 Q. Why did you choose to add this term to
3 the sentence?

4 A. No particular meaning.

5 Q. So is it fair to say that your
6 understanding of "by themselves are not new,
7 per se" is the same as "not new"?

8 A. Correct.

9 Q. Now, you mentioned that before the
10 '842 patent, some textbooks have already
11 introduced the P2P connection. What kind of
12 system has used the P2P connection in those
13 textbooks?

14 A. From what I read, it only indicated the
15 P2P connection without indicating what kind of
16 system it has to be used in.

17 Q. How is the P2P connection in those
18 textbooks different from the P2P connection you
19 claimed in the '842 patent, or is there any
20 difference?

21 A. It has been a while, and I think the
22 textbook indicate that the technique theory of

1 the P2P connection, but I am not able to find
2 that textbook anymore, so I'm not able to answer
3 your question.

4 Q. Do you think if anyone else who had
5 access to those textbooks read the P2P
6 connection in those books will have difficulty
7 in putting the P2P connection into actual
8 products?

9 A. I am not other people or anyone, so I
10 am not able to respond on behalf of that.

11 Q. Is there any technical reason that you
12 can think of that can prevent people from
13 implementing what's in the textbook to actual
14 products?

15 A. Based on my own experience, according
16 to the theory from the textbook, we have
17 conducted many experiments and spent a lot of
18 time to test that possibility, and as I said
19 earlier, and if anyone have done the same thing
20 like we did, trying to have it to be implemented
21 into actual product, they would have the same
22 difficulty that we encountered.

1 Q. Now, turning back to paragraph 4, you
2 also mentioned that "The hole puncture technique
3 by themselves are not new per se in the
4 industry"; correct?

5 A. Yes.

6 Q. Is it your testimony that hole puncture
7 technique is also not new?

8 A. Correct.

9 Q. What kind of systems have used the hole
10 puncture technique?

11 A. Are you asking me product in our
12 company or other companies?

13 Q. In the industry. That's what you put
14 into this paragraph. "It's not new in the
15 industry."

16 A. I can only say that I have read about
17 the technique in a textbook, and therefore is
18 not new.

19 Q. So is it also your testimony that
20 before the '842 patent, nobody in the industry
21 had ever put hole puncture technique into actual
22 products?

1 A. That's my understanding.

2 Q. Same question as before:

3 Is there any technical reason that you
4 think a person having access to the textbooks
5 will have difficulty in implementing the hole
6 puncture technique to actual products?

7 A. Hole puncture technique is related to
8 P2P connection technique. To say it correctly,
9 hole puncture technique is part of the P2P
10 connection technique. I hope that answers your
11 question.

12 Q. Well, thank you for doing that.

13 So is it fair to say that the
14 combination of P2P connection with hole puncture
15 technique is not new in the industry?

16 A. It is correct that that combination is
17 not new, but, still, I have not seen anyone
18 utilize that combination technique in an actual
19 product.

20 Q. Understood.

21 Now, let's go to paragraph 5, also on
22 the first page of your declaration. It recites,

1 "Image recognition technology is also not new in
2 the industry at the time when the '842 patent's
3 earliest application was filed"; correct?

4 A. Yes.

5 Q. Now, why did you characterize image
6 recognition as "not new" instead of "not new
7 per se"?

8 A. Well, to me they are the same meaning.

9 Q. In the second part in paragraph 5 you
10 mention, "Barcode, QR code and even fingerprint
11 recognition all have been widely practiced
12 before the '842 patent"; correct?

13 A. Correct.

14 Q. Let's start with barcode. In what kind
15 of system or scenario has barcode been used
16 before the '842 patent was filed?

17 A. Well, you can see a lot of barcodes on
18 many consumer products.

19 Q. What's the purpose for using a barcode?

20 A. Are you asking it generally or our
21 product?

22 Q. Generally, why people used barcode

1 before the '842 patent.

2 A. There are two purposes. One was for
3 the conveniency that you don't actually have to
4 type in anything, and the second one is it's
5 more accurate than typing in the information.

6 Q. How about the QR code?

7 A. It's different than barcode because
8 QR code is primarily used for industrial usage.

9 Q. Why do people use QR code?

10 A. QR code improves the certain weak
11 points of barcode. For instance, it can include
12 more information in the code. And, besides, it
13 has less limitation in scanning.

14 Q. And how about fingerprint recognition?

15 A. What do you want to ask about that?

16 Q. Same as before.

17 Why did people use fingerprint
18 recognition?

19 A. Because it's unique in the sense that
20 everyone's fingerprint is different.

21 MR. KING: Counsel, I would like to
22 request -- right now it's 12:20. Should we have

1 lunch recess for an hour?

2 MS. SUN: Sure. I'll probably just
3 have one or two more questions regarding this
4 section, so if you can let me finish that.
5 Probably five more minutes.

6 MR. KING: Okay.

7 BY MS. SUN:

8 Q. So is it fair to say that people have
9 been using various kinds of image recognition
10 before the '842 patent, including the barcode,
11 QR code and fingerprint recognition?

12 A. It's true with barcode and fingerprint
13 recognition, but it was not that common using
14 QR code.

15 Q. You mention it's not common, but you
16 know that people have used QR code before the
17 '842 patent; correct?

18 A. Yes.

19 Q. And is it fair to say that all of the
20 image recognition technique that we just
21 discussed save people's time to manually input
22 information themselves?

1 A. Well, as I said earlier, QR code had
2 the advantage over the merit of having some of
3 the barcode issues improved. However, it was
4 not commonly used.

5 Q. Is it one of the QR code's benefit to
6 save people's time in manually inputting the
7 information themselves?

8 A. Yes.

9 Q. So is it fair to say that prior to the
10 '842 patent, people have been using various
11 image recognition techniques that's alternative
12 to manual input?

13 A. I don't think you can conclude that
14 with the three different type of techniques
15 because each of them have different goal and was
16 used in different industries.

17 Q. Well, as you explained in paragraph 5,
18 all of the three different techniques are
19 related to image recognition; correct?

20 A. It is true with barcode and QR code,
21 but not in terms of fingerprint techniques,
22 because it's not related to image recognition.

1 Q. Understood.

2 But I think you testified that for all
3 of the three different techniques, one of the
4 benefits they share is that people do not need
5 to manually type in information; correct?

6 A. Correct.

7 MS. SUN: Okay. Let's take a break.

8 Thank you.

9 (Whereupon, at 12:28 p.m.,
10 the deposition of YU-LI KAO was
11 adjourned for noon recess.)

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1 (At 1:26 p.m., the
2 deposition of YU-LI KAO was
3 reconvened.)
4

5 EXAMINATION (CONTINUED)

6 BY MS. SUN:

7 Q. Mr. Kao, welcome back from the break.
8 During the break, did you discuss any substance
9 of your deposition with your counsel?

10 A. We talked about maybe sandwich is a bit
11 dry.

12 Q. Well, next time you're here, we'll
13 offer better lunch than a sandwich.

14 A. Maybe Chinese food.

15 Q. We'll try to finish this early so you
16 can go to some nice Chinese restaurant here.

17 So let's turn to paragraph 6 of your
18 declaration, on page 2.

19 So paragraph 6 recites, "However,
20 adapting the image recognition-related technique
21 for enhancing users' experience in establishing
22 the P2P connection is novel and is not, per se,

1 obvious at the time when the 842 patent's
2 earliest application was filed."

3 Do you see that?

4 A. Yes.

5 Maybe I can hear the interpretation on
6 that.

7 Yes.

8 Q. What do you mean by "adapting the image
9 recognition related technique"?

10 A. One of them is related to QR code
11 technique.

12 Q. Can you specify that?

13 A. Can you please repeat the question.

14 Q. Well, in paragraph 6 you said "adapting
15 the image recognition related technique."

16 What do you mean by adapting the
17 technique?

18 A. Okay. Like I said earlier, combining
19 the image recognition technique and P2P
20 connection, creates a very good effect which has
21 not been used up until that point.

22 So like I also give the example of

1 fingerprint recognition. Since everybody's
2 fingerprint is different, so if you have to
3 input all the information related to the
4 fingerprint's characteristics, it will be very
5 time-consuming and trouble.

6 So even though by scanning the
7 fingerprint, it only reads the characteristic of
8 the fingerprint itself that enables you to have
9 a lot of convenience in, for instance, opening
10 the door and other benefits.

11 So also it's a very good experience for
12 user, while scanning the QR code, you can be
13 connected to a device from far away.

14 Q. Understood.

15 So let me make sure I understand your
16 answer to my question.

17 So you thought the combination between
18 P2P connection and image recognition is novel;
19 correct?

20 A. Yes.

21 Q. But P2P connection itself is not novel;
22 correct?

1 A. Correct.

2 Q. And, similarly, image recognition
3 technique is also not novel; correct?

4 A. Correct.

5 Q. Now, here you used the term "not per se
6 obvious."

7 What's your understanding of that term?

8 A. What I meant was, the combination of
9 the two techniques was not a commonly-seen
10 technique.

11 Q. Why do you think it's not "per se
12 obvious"?

13 A. It meant that it was not common.

14 Q. So you think it's not per se obvious
15 because you personally have not seen people
16 making that combination; correct?

17 A. That's correct.

18 Q. But do you know whether anyone has ever
19 used or ever considered to use image recognition
20 in combination with the P2P connection?

21 A. I have not seen any.

22 Q. Did you do any market analysis to

1 confirm your understanding?

2 A. As I said earlier, my basis was based
3 on the customers' feedback. So if you consider
4 that a market analysis, that's my answer.

5 Q. But besides those customer feedback,
6 you did not actually see the products on the
7 market or dive into those products to see
8 yourself whether those products have ever used
9 the combination between P2P and image
10 recognition technique; correct?

11 A. Okay. I can add that, other than the
12 customers' fee, I would also dive into products
13 in the market, not necessarily for research
14 purpose, but just that I would do that.

15 Q. Is there any reason, technical or
16 otherwise, that you can think of that will
17 prevent people from combining P2P connection
18 with image recognition techniques?

19 A. I'm not anybody. I wouldn't be able to
20 understand what anybody is thinking.

21 Q. Is there any technical difficulties in
22 combining the two technologies?

1 A. So, yes, because, first of all, you
2 have to understand the P2P technique, and you
3 have to be able to set up an ID code and convert
4 it into a QR code and to be usable in a scanning
5 machine. So a person would, first of all, need
6 to understand both technique and also to
7 recognize the benefit of combining the two
8 techniques together. Then they would be able to
9 experience what we did.

10 Simply put, there is a certain
11 difficulty doing that.

12 Q. So let's say someone understands the
13 P2P connection, and they also understand the
14 image recognition techniques, and they also
15 understand the benefits of combining the two to
16 enhance the customers' experience. Is there
17 anything that will prevent the person from
18 combining those two to provide a new product?

19 MR. KING: Objection. I think that's a
20 hypothetical question.

21 BY MS. SUN:

22 Q. Go ahead and answer, please.

1 A. I can only say that assuming someone is
2 equipped with all the knowledge that you just
3 mentioned, this person would still need to
4 possess the related techniques in order to
5 achieve that. In other words, you can think of
6 an idea that you don't necessarily can have it
7 implemented.

8 Q. Understood.

9 Now, let's turn to paragraph 8 of your
10 declaration, also on page 2. Paragraph 8 says,
11 "I have cursorily reviewed the compensated
12 declaration by Mr. Kardashov in regard my
13 invention and related Lorex publication"; right?

14 A. Yes.

15 Q. What do you mean by "cursorily
16 reviewed"?

17 A. That means quickly.

18 Q. Why did you choose not to do a thorough
19 review of his declaration?

20 A. I was saying by "cursorily reviewed the
21 declaration," gave me the understanding of what
22 he was saying, and that was sufficient.

1 Q. Now, Mr. Kardashov's declaration is
2 written in English; right?

3 A. Yes.

4 Q. Did you review his declaration in
5 English, or did you have it translated?

6 A. I read it in English with the aid of
7 Google translation.

8 Q. Understood.

9 How many hours did you spend on
10 reviewing his declaration?

11 A. I don't remember.

12 Q. Can you give me an estimate?

13 A. I cannot tell you that because I read
14 it off and on, not like all in one shot.

15 Q. Couple of hours?

16 A. More than two hours for sure.

17 Q. Is it more than five hours?

18 A. I don't remember.

19 Q. Understood.

20 Now, let's turn to paragraph 9, which
21 recites, "I have personally met Mr. Kardashov in
22 October 11, 2012 in Taipei, Taiwan"; right?

1 A. Please give me a minute.

2 Yes.

3 Q. And later in that paragraph you said,
4 "After a lengthy discussion and
5 Exclusivity Agreement between the Throughtek and
6 Lorex was reached"; correct?

7 A. Yes.

8 Q. What was the purpose of the meeting?

9 A. Primarily because Mr. Kardashov wanted
10 to utilize our technology in their -- our
11 techniques in their products.

12 Q. What technology are you talking about?

13 A. P2P.

14 Q. So Mr. Kardashov specifically requested
15 the meeting to discuss ThroughTek's P2P
16 technology; correct?

17 A. Yes.

18 Q. And when you're saying "Throughtek's
19 P2P technology," are you referring specifically
20 to the technology that's in the '842 patent?

21 A. Yes.

22 Q. And that's the only thing you discussed

1 during the meeting?

2 A. We discussed the P2P technology as well
3 as business partnership or cooperation going
4 forward.

5 Q. Now, let's you turn to paragraph 10
6 which recites, "Throughtek has provided its
7 complete P2P solution to Lorex, including the
8 subject matter in the '842 patent for
9 Exclusivity Agreement."

10 A. Yes.

11 Q. Now, let's turn to page 12 of your
12 declaration, which is the page of Exhibit B.

13 A. Okay.

14 Q. Is this the Exclusivity Agreement that
15 Throughtek and Lorex reached after the meeting?

16 A. Yes.

17 Q. Who suggested to enter into this
18 Exclusivity Agreement?

19 A. I can't quite remember.

20 Q. And the first paragraph of the
21 Exclusivity Agreement recites, "This
22 Exclusivity Agreement is made and entered into

1 as of the Joint Venture Partnership by and
2 between Lorex," blah, blah, blah "and
3 Throughtek, (the Partner)"; correct?

4 A. Yes.

5 Q. So the term "Partner" as used in this
6 agreement refers to Lorex and Throughtek
7 collectively; correct?

8 A. Yes, that's correct.

9 Q. And in paragraph B it says, "The
10 Partner is the owner of all right, title and
11 interest in and to the assets more particularly
12 described on Schedule 'A' hereto (collectively,
13 the 'Assets')"; correct?

14 A. Yes.

15 Q. Now, let's turn to the last page of
16 your declaration starting with "Schedule 'A,'
17 Assets."

18 Is it fair to say that this Schedule A
19 also refers to the assets we just talked about?

20 A. Yes.

21 Q. Is it fair to say that Schedule A
22 contains all of the assets that Throughtek owned

1 and exchanged with Lorex under the
2 Exclusivity Agreement?

3 A. That's not quite true, because the
4 assets, which belong -- the asset and technology
5 which belongs to Throughtek was ever-improving
6 and increasing.

7 And also in Schedule A, it also did not
8 indicate that we are offering our complete asset
9 to them.

10 Q. So let's just focus on the
11 Exclusivity Agreement and its reference to
12 "Schedule A, 'Assets.'"

13 Let's just focus on that point in time.
14 Does Schedule A contain all of the assets that
15 Throughtek owned and exchanged with Lorex under
16 the Exclusivity Agreement?

17 A. The document speaks for itself, and I
18 am not able to testify other than that.

19 Q. That's fine.

20 So just looking at Asset A right now,
21 is there anything that you think Throughtek
22 shared with Lorex under the

1 Exclusivity Agreement that is not listed here?

2 A. I cannot quite remember because this
3 agreement was entered quite some time ago.

4 Q. Is there any reason to doubt that
5 Asset A includes all the assets that were
6 exchanged under the Exclusivity Agreement?

7 A. I cannot give you a definite answer at
8 this time because this was really quite some
9 time ago.

10 Q. Understood.

11 Now, please review the language in
12 "Schedule 'A' Assets," and I will read it for
13 the record.

14 "The partner will develop connectivity
15 services with a connection platform based on P2P
16 (Point to Point) network connection architecture
17 and advanced Cloud computing technology via API
18 (Application Programming Interface) for
19 cross-platform connection. The end result will
20 allow developers to utilize a ready-to-use API
21 to build up the connection between different
22 devices and across different operation systems."

1 A. Okay.

2 Q. Now, looking at the entire asset list
3 on Schedule A, do you see the word "image
4 recognition"?

5 A. Not in the text, no.

6 Q. Do you see the word barcode?

7 A. No.

8 Q. Do you see the word QR code?

9 A. No.

10 Q. Do you see the word fingerprint
11 recognition?

12 A. No.

13 Q. Do you see anything that's related to
14 image recognition technique?

15 A. Yes. Because when we were talking
16 about P2P connection, we were already including
17 the QR code and P2P connection.

18 So to us, this P2P connection refers to
19 adding the QR code technology in there, and I
20 think that was the main reason that the
21 [inaudible] or Lorex wanted to be in a
22 partnership with us.

1 Q. So is it your testimony that the
2 parties discussed the image recognition
3 technique during the meeting but for some reason
4 did not put the image recognition technique into
5 the Exclusivity Agreement?

6 A. You can say that.

7 Q. Why is that the case?

8 A. So as I said earlier, at that time,
9 even though P2P technology was mentioned in
10 textbook, nobody thought adding QR code in the
11 technology would enhance users' experience.

12 Q. I understand that.

13 So my question is, if it is critical to
14 combine the QR code with the P2P technology, why
15 didn't the parties put image recognition
16 technique into Schedule A to the
17 Exclusivity Agreement?

18 A. I don't remember, nor can I really
19 explain the reason why didn't we do it then.

20 Q. That's fine.

21 So let's turn to paragraph 11, where it
22 starts with, "Mr. Kardashov's declaration stated

1 that Throughtek did not partake any portion of
2 the referenced Lorex publication and video.
3 These referenced Lorex publications and video in
4 Mr. Kardashov's declaration are user manual and
5 instructional video for Internet protocol (IP)
6 camera. It is common practice that Throughtek,
7 as a technical solution provider, does not
8 involve in client's marketing campaigns."

9 Do you see that?

10 A. Yes, I see it.

11 Q. So is it fair to say that when you're
12 talking about Lorex publications, you're
13 referring to Lorex publications of the user
14 manual and instructional videos of the IP
15 camera?

16 A. Well, it is correct if you are talking
17 about currently when I look at the Lorex video,
18 but not at the time when we signed the
19 agreement.

20 Q. I understand. And we're only talking
21 about the Lorex publications that's in
22 Mr. Kardashov's declaration.

1 A. Okay.

2 Q. And you said, "It is common practice
3 that Throughtek, as a technical solution
4 provider, is not involved in client's marketing
5 campaigns."

6 By using "client's marketing
7 campaigns," are you referring to the Lorex
8 publications?

9 A. Yes.

10 Q. So is it fair to say that Throughtek or
11 you never drafted or prepared any portion of
12 those Lorex publications?

13 A. Correct.

14 Q. And you have also not reviewed those
15 publications before reviewing Mr. Kardashov's
16 declaration; correct?

17 A. I have reviewed both. I, however, do
18 not recall which one I reviewed first.

19 Q. Now, let's turn to paragraph 12,
20 starting with, "Lorex did not have any software
21 development team to implement any core portion
22 of the P2P solution at the time the

1 '842 patent's earliest application was filed,
2 which Lorex relied on through Throughtek's P2P
3 solution for its products."

4 Do you see that?

5 A. Yes.

6 Q. Now, when you're saying "P2P solution"
7 in this paragraph, what P2P solution are you
8 referring to?

9 A. So as I said earlier, when we talked to
10 our customers or partners, we were talking about
11 P2P solution -- the complete P2P solution plus
12 the QR code scanning.

13 Q. Understood.

14 So the "Throughtek's P2P solution" in
15 this paragraph refers to the claimed invention
16 in the '842 patent?

17 A. Yes.

18 Q. How do you know that Lorex did not have
19 any software development team to implement the
20 core portion of the P2P solution?

21 A. Because they lack that technology, and
22 that was also the reason they wanted to discuss

1 partnership with us.

2 Q. So when you said Lorex did not have any
3 software development team, you're talking about
4 the time when the parties met to reach the
5 Exclusivity Agreement; correct?

6 A. Of course.

7 Q. So is it your opinion that Lorex also
8 did not have any capability to incorporate any
9 portion of the P2P solution, not only that they
10 don't have any software development team?

11 A. Right. That's to my recollection.
12 That's the reason Lorex wanted to be in
13 partnership with us because they had neither the
14 software development team nor the technology to
15 do that.

16 As far as if they were capable of doing
17 the implementation, then I'm not able to judge.

18 Q. Now, you also stated that "Lorex does
19 not have such team to implement any core portion
20 of Throughtek's P2P solution."

21 What do you mean by "core portion"?

22 A. Core portion consists of many portions.

1 So not only that they need to have the
2 P2P solution, but in order to put the
3 P2P solution and the QR code scanning onto a
4 smartphone, it require a special app to achieve
5 that.

6 Q. And so is it your testimony that the
7 core portion for Throughtek's solution is the
8 development of that special app?

9 A. Yes.

10 Q. Well, since you used the term "core
11 portion," is it also your opinion that Lorex
12 might have someone to employ some other portion
13 of Throughtek's P2P solution but just not the
14 core portion?

15 A. I have no understanding if that was
16 possible, because as I said earlier, Lorex did
17 not have the software development team.

18 Q. Okay. Well, let's go to paragraph 14
19 starting with the section, "In Regard the
20 Declaration of Dr. Bim."

21 So, likewise, in paragraph 14, you also
22 said that, "I have also cursorily reviewed the

1 compensated declaration by Dr. Bim in regard my
2 invention"; correct?

3 A. Yes.

4 Q. Do you remember how many hours did you
5 spend on reviewing Dr. Bim's declaration?

6 A. I don't remember. I reviewed it off
7 and on.

8 Q. Was it more than two hours?

9 A. Possible.

10 Q. Was it more or less than the hour you
11 spent in reviewing Mr. Kardashov's declaration?

12 A. I don't remember.

13 Q. Let's turn to paragraph 17, which
14 starts with, "It is unclear to me what basis
15 Dr. Bim relied on to conclude the standard for
16 POSITA."

17 Do you see that?

18 A. Yes.

19 Q. Now, what's your understanding of
20 POSITA?

21 A. I don't remember at this time.

22 Q. Do you consider yourself as a POSITA?

1 A. I remember googling the definition of
2 POSITA. I don't remember this meaning at this
3 time.

4 Q. Well, let me remind you by looking at
5 paragraph 16, starting with, "Dr. Bim asserted
6 that a person of ordinary skill in the art
7 (POSITA)."

8 A. Oh, okay.

9 Q. Does that remind you what POSITA means?

10 A. Yes.

11 Q. Now, let me ask my question again.

12 What is your understanding of a POSITA?

13 A. A person of necessary technology,
14 capability.

15 Q. What qualifies a person as a POSITA?

16 A. The person must have the understanding
17 of the related technology.

18 Q. Now, Dr. Bim opined that a POSITA would
19 have had a bachelor's degree in electrical
20 engineering and two years of work experience
21 with network and communication technologies.

22 What's your thoughts or rebuttals to

1 Dr. Bim's definition for POSITA?

2 A. I don't know what Dr. Bim's
3 qualification was to qualify him to give this
4 opinion, so I'm not able to comment.

5 Q. Okay. So you just testified that you
6 think to qualify as a POSITA, the person must
7 have an understanding of the related technology;
8 correct?

9 A. No. No. What I said was, I don't know
10 what Mr. Bim's basis was to opine in his
11 statement.

12 Q. Well, I understand that part, but I'm
13 just reading through your past answer.

14 The question was, "What qualifies a
15 person as a POSITA?"

16 Answer, "The person must have the
17 understanding of the related technology."

18 A. Yes.

19 Q. Now, do you have any doubt about a
20 person's knowledge about the related technology
21 if this person has a bachelor's degree in
22 electrical engineering and two years of

1 experience with network in communication
2 technologies?

3 A. Are we talking about P2P technology and
4 the so-called related technology?

5 Q. Well, I'm just using your own words.

6 You mentioned that, "A POSITA must have
7 the understanding of the related technology."

8 What "related technology" are you
9 talking about?

10 A. So my answer to your question is
11 uncertain, because it's not a certainty that if
12 a person obtained a bachelor's degree in
13 electrical engineering and two years of
14 experience in working in the related field, I
15 mean, it varied based on the individual's
16 ability and characteristics, so I'm not able to
17 answer that.

18 Q. So is your testimony that to determine
19 whether someone qualifies as a POSITA, you need
20 to look individually to their experience and
21 qualifications; correct?

22 MR. KING: Objection. What's the

1 relevancy of POSITA again?

2 MS. SUN: Because Mr. Kao put this into
3 his declaration, and he tries to raise an issue
4 about the definition for POSITA. I'm just
5 asking the content of this declaration.

6 MR. KING: Okay.

7 THE WITNESS: Correct.

8 BY MS. SUN:

9 Q. Do you consider yourself as a POSITA?

10 A. Yes.

11 Q. Now, let's turn to paragraph 33, which
12 is on page 7 of your declaration.

13 Paragraph 37 [sic] starts with, "A
14 negative limitation, defined as a restriction or
15 exclusion within a claim rather than an
16 affirmative feature, can indeed be inherently
17 supported by the specification."

18 Do you see that?

19 A. Okay. Let me take a minute.

20 Yes.

21 Q. Where did you get that definition from?

22 A. I don't quite understand your question.

1 Q. Well, paragraph 33 starts with a
2 definition for negative limitation. Sorry. I
3 probably mispronounced the paragraph number.
4 Apologies.

5 A. Okay.

6 Q. Where did you get the definition for
7 negative limitation?

8 A. What do you mean by, where did I get
9 it?

10 Q. Do you understand this definition to be
11 accurate in a legal sense, or is it just your
12 personal definition?

13 A. Certainly based on my personal
14 understanding.

15 Q. Where did you get that understanding
16 from?

17 A. Based on my review of Mr. Bim's
18 declaration.

19 Q. Do you understand the term "negative
20 limitation" is a legal term?

21 A. I don't.

22 Q. Do you happen to hold any law degree?

1 A. No.

2 Q. Do you think you are qualified to give
3 legal definitions?

4 A. No. Only represent my personal
5 opinion.

6 Q. In the entirety of your declaration, is
7 there anywhere you're trying to give any legal
8 opinions on anything?

9 A. No. It's only from my personal
10 opinion.

11 May I go to the bathroom because it's
12 2:30 already?

13 MS. SUN: Sure.

14 I'll probably only have two or three
15 more questions, so if you want to use the
16 restroom now, you can go ahead and use it now,
17 and we can resume.

18 THE WITNESS: Okay.

19 (Recess taken.)

20 BY MS. SUN:

21 Q. Mr. Kao, let's go back to page 1 of
22 your declaration, and please read paragraph 4, 5

1 and 6 to yourself, and let me know when you're
2 finished.

3 A. Yes.

4 Q. Now, let's go to Exhibit 3, which is
5 declaration for Dr. Chen.

6 And please turn to page 4. Please read
7 paragraph 17, 18 and 19, and let me know when
8 you finish. It's on page 4.

9 A. Okay.

10 Q. Do paragraph 17 through 19 on
11 Dr. Chen's declaration look similar to
12 paragraphs 4 through 6 in your declaration?

13 A. Yes.

14 Q. Is it fair to say that they used almost
15 identical language?

16 A. Yes, very similar.

17 Q. You can do a comparison yourself, but I
18 will represent that paragraphs 5 and 6, at least
19 have the exact same language as paragraphs 18
20 and 19 on Dr. Chen's declaration.

21 A. Yes.

22 Q. And I remember you testified earlier

1 during the deposition that you never discussed
2 with Dr. Chen regarding his declaration, your
3 declaration or anything at all related to the
4 case; correct?

5 A. I remember testifying saying that I
6 have discussion with Charles Du, and whether or
7 not Charles communicated with others, I'm not
8 sure whether that's the reason of the
9 similarities.

10 Q. Charles Du drafted your declaration?

11 A. I drafted it myself, and Charles Du
12 provided me some suggestions.

13 Q. Why do you think the two declarations
14 used the identical language in those paragraphs?

15 A. So as I said, I had discussion with
16 Charles Du, and we had back-and-forth
17 suggestions and iterations, and whether or not
18 Charles Du and the other party also have the
19 same concept, I'm not sure.

20 Q. Is it fair to assume that
21 Mr. Charles Du drafted at least a portion of
22 both your declaration in English and Dr. Chen's

1 declaration in English?

2 A. I can only say Charles Du did not draft
3 my declaration, but rather he was basing my
4 Chinese version of declaration and provided some
5 suggestion to me.

6 Q. Do you know whether Mr. Charles Du is a
7 registered US attorney?

8 A. I don't know.

9 Q. Did anyone else besides Mr. Charles Du
10 help you in revising or drafting your
11 declaration?

12 A. I think just Charles Du.

13 Q. So is it fair to say that all the
14 drafts to your declarations involved only
15 discussions between you and Mr. Charles Du?

16 A. Yes.

17 MS. SUN: Okay. No more questions.

18 THE WITNESS: Okay.

19 EXAMINATION

20 BY MR. KING:

21 Q. I'd like to cross just real quick.

22 Mr. Kao, do you know everything about

1 what Mr. Charles Du has been doing as an
2 attorney?

3 A. I would not be able to know that.

4 Q. So would you think that Charles Du
5 might talk to an attorney without your presence
6 in this case?

7 A. That's possible.

8 Q. So do you think Charles Du might have
9 talked to an attorney about your declaration and
10 revised -- and give revising suggestion
11 accordingly?

12 A. Possible.

13 MR. KING: No more questions. Thanks.

14 MS. SUN: Thank you.

15 (AT 2:47 p.m., the
16 deposition of YU-LI KAO was
17 adjourned.)

18

19

20

21

22

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2 COUNTY OF SAN MATEO) SS.

3

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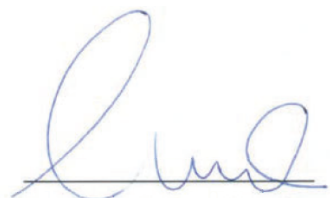
17 Witness my hand this 21st day of February,
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11 Page No. Line No. Change

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1 STATE OF CALIFORNIA)
2 COUNTY OF SAN MATEO) SS.
3

4 I, AUDRA E. CRAMER, C.S.R. No. 9901, in and for
5 the State of California, do hereby certify:

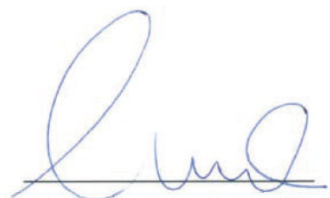
6 That, prior to being examined, the witness named
7 in the foregoing deposition was by me duly sworn to
8 testify the truth, the whole truth and nothing but the
9 truth;

10 That said deposition was taken down by me in
11 shorthand at the time and place therein named, and
12 thereafter reduced to typewriting under my direction,
13 and the same is a true, correct and complete transcript
14 of said proceedings;

15 I further certify that I am not interested in the
16 event of the action.

17 Witness my hand this 21st day of February,
18 2025.

19
20
21
22



Certified Shorthand
Reporter for the
State of California