

Deposition of
David B. Tuckerman, Ph.D.
November 25, 2025
Volume 3

Thermaltake Technology Co.
vs.
Lian Li Industrial Co.



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Page 220 1 UNITED STATES PATENT AND TRADEMARK OFFICE 2 BEFORE THE PATENT TRIAL AND APPEAL BOARD 3 4 THERMALTAKE TECHNOLOGY CO., LTD.) and THERMALTAKE, INC. (a.k.a.) 5 THERMALTAKE USA),) 6 Petitioners,) 7 vs.)IPR2024-01230)U.S. Patent No. 8 LIAN LI INDUSTRIAL CO., LTD.,)10,690,336 and CHEN, CHIEN-HAO,) 9 Patent Owners.) 10 _____) 11 12 REMOTE ZOOM VOLUME 3 DEPOSITION OF 13 DAVID B. TUCKERMAN, Ph.D. 14 TUESDAY, NOVEMBER 25, 2025, 1:02 P.M. PST 15 16 Volume 3 David B. Tuckerman, Ph.D. 17 18 19 20 21 22 23 24 JOB NO. 10178331 25 Reported by Elizabeth A. Willis-Lewis, CSR 12155	Page 222 1 APPEARANCES: 2 3 FOR THE PETITIONERS: 4 PILLSBURY WINTHROP SHAW PITTMAN, LLP BY: SURUI QU, ESQ. 5 BROCK WEBER, ESQ. 4 Embarcadero Center, Floor 22 6 San Francisco, California 94111-5998 415.983.1197 7 surui.qu@pillsburylaw.com 8 9 FOR THE PATENT OWNERS: 10 GREENBERG TRAURIG, LLP BY: KYLE CHEN, ESQ. 11 1900 University Avenue, Floor 5 E Palo Alto, California 94303-2283 12 650.289.7887 kchen@gtlaw.com 13 14 15 APTUS MONITOR: RYAN ASANAS 16 Thermaltake Technology Co. vs. Lian Li Industrial Co. 17 18 19 20 21 22 23 24 25
Page 221 1 UNITED STATES PATENT AND TRADEMARK OFFICE 2 BEFORE THE PATENT TRIAL AND APPEAL BOARD 3 4 THERMALTAKE TECHNOLOGY CO., LTD.) and THERMALTAKE, INC. (a.k.a.) 5 THERMALTAKE USA),) 6 Petitioners,) 7 vs.)IPR2024-01230)U.S. Patent No. 8 LIAN LI INDUSTRIAL CO., LTD.,)10,690,336 and CHEN, CHIEN-HAO,) 9 Patent Owners.) 10 _____) 11 12 13 14 15 16 17 18 19 20 21 22 REMOTE ZOOM VOLUME 3 DEPOSITION OF DAVID B. 23 TUCKERMAN, commencing at 1:02 p.m. PST, Tuesday, 24 November 25, 2025, before Elizabeth A. Willis-Lewis, 25 RMR, RPR, CCRR, CSR No. 12155.	Page 223 1 INDEX 2 3 WITNESS: DAVID B. TUCKERMAN 4 5 EXAMINATION PAGE 6 By Ms. Qu 225 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

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1 TUESDAY, NOVEMBER 25, 2025, 1:02 P.M. PST

2

3 COURT REPORTER: Good morning. My name is

4 Elizabeth Willis-Lewis and my California CSR No. is

5 12155.

6 DAVID B. TUCKERMAN,

7 having been first duly sworn, testified as

8 follows:

9 COURT REPORTER: Thank you.

10 MS. QU: Surui Qu from Pillsbury, Winthrop,

11 Shaw, Pittman on behalf of Petitioners in the

12 proceeding. With me is my colleague Brock Weber.

13 MR. CHEN: Kyle Chen from Greenberg Traurig

14 on behalf of patent owner.

15 EXAMINATION BY MS. QU:

16 Q. Okay. I think we can get started. So good

17 afternoon, Dr. Tuckerman.

18 A. Good afternoon.

19 Q. You remember you provided deposition testimony

20 in this IPL proceeding before, right, in July and

21 October?

22 A. That sounds right.

23 Q. And I assume there is nothing preventing you

24 from thinking clearly and testifying truthfully today?

25 A. That's right.

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1 Q. And I understand you may have a medical

2 emergency. And if you need a break at any time will you

3 please let me know?

4 A. I will. Thank you.

5 Q. Can you let me know where you are testifying

6 from today?

7 A. I am at my home. I am actually upstairs in my

8 son's bedroom, who is off at college so it is empty, no

9 documents in it. The address is 12724 128th Avenue

10 Northeast, Lake Stevens, Washington 98258.

11 Q. Thank you. Is there anyone with you in the

12 room right now?

13 A. No.

14 Q. How many computers are there in the room with

15 you right now?

16 A. Just my laptop that I am on right now.

17 Q. Are there any other monitors that's on in the

18 room?

19 A. No.

20 Q. Do you have any documents printed with you

21 today?

22 A. No.

23 Q. Other than the realtime and the Zoom are there

24 any other windows open on your laptop?

25 A. Well, my e-mail is opened, but I can close that

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1 now that I have got all the information in. Let's see.

2 I got Excel open. I will close that. Quick, I will

3 close that and let's see close -- that's it. Just the

4 Zoom window and the Bridge Mobile window on Edge.

5 Q. Thank you. So I'm going to drop in the Chat

6 box some exhibits so that you have them handy. So the

7 first one is Exhibit 2052.

8 MR. CHEN: Just one second. So just for some

9 reason it shows access to file restricted by your

10 account. So actually I can't see what you just dropped.

11 BY MS. QU:

12 Q. Dr. Tuckerman, can you access the exhibit that

13 I just dropped in the Chat box?

14 A. I see two exhibits, 2052 and 2054. Is that

15 what you are talking about?

16 Q. Yeah.

17 A. Okay. So let me try and click on the PDF.

18 Q. Yeah. So, Kyle, what I just dropped in the

19 Chat box is Exhibit 2052 and 2054, which are the latest

20 two declarations by Dr. Tuckerman.

21 MR. CHEN: Okay. So 2520?

22 MS. QU: 2052 and 2054.

23 MR. CHEN: 2054, okay.

24 BY MS. QU:

25 Q. Dr. Tuckerman, let me know when you have these

Page 228 1 two exhibits downloaded. 2 A. Okay. I've got to figure out where it 3 downloaded it to. Okay. Loaded it into -- yeah, okay. 4 I found out where it loaded them and now I will open 5 them both. Okay. So I have -- in addition to the other 6 windows we talked about I have an Adobe window opened 7 with the two exhibits in tabs. 8 Q. Can you confirm for me that Exhibit 2052 is a 9 copy of your Declaration in Support of Patent Owners 10 Revised Contingent Motion to Amend dated October the 11 3rd, 2025? 12 A. Yes, I can confirm. 13 Q. Okay. And then for the other exhibit -- can 14 you confirm for me that Exhibit 2054 is a copy of your 15 Declaration in Support of Patent Owners Reply to the 16 Revised Contingent Motion to Amend dated November 17, 17 2025? 18 A. Yes, correct. 19 Q. Thank you. Can you turn to PDF page 21 of 20 Exhibit 2052? Let me know when you are there. 21 A. PDF page 21, not printed page 21; is that 22 right? 23 Q. PDF page 21. 24 A. PDF page 21. 25 Q. And you will see the same page numbers shown on Volume 3 David B. Tuckerman, Ph.D.	Page 230 1 talking in B about -- yes. 2 Q. Okay. Dr. Tuckerman, in your opinion can claim 3 6 and 7 be implemented without any connector off the 4 first illumination fan that can be connected to an 5 external power source? 6 MR. CHEN: Improper hypothetical. Lack of 7 foundation. 8 BY MS. QU: 9 Q. You may answer, Dr. Tuckerman. 10 A. Yes, I am just thinking about your question. I 11 guess I -- I would need to see an example. I mean, 12 the -- the -- what I will say is that the first 13 illumination fan needs to receive power from, you 14 know, -- you would have to give me a specific example 15 and then I could map it to the claim is I guess what I 16 would say. 17 Q. I am just asking can claim 6 and 7 be 18 implemented without receiving power supply -- without -- 19 okay. Let me strike that. Let me ask it this way. 20 Can claim 6 and 7 be practiced without any 21 connector that can receive power supply? 22 MR. CHEN: Vague and ambiguous. Lack of 23 foundation. Improper hypothetical. 24 MR. WEBER: Let's keep the objections to form, 25 please. Stop coaching the witness. Thermaltake Technology Co. vs. Lian Li Industrial Co.
Page 229 1 the bottom right of that page. 2 A. Oh, yes, where it says page 21 of 53, uh-huh. 3 Q. Okay. So there -- starting from PDF page 21 4 there is your opinion regarding written description for 5 Element B. First, for the record, can you read Element 6 B for me? It starts from PDF page 21 and continues 7 through PDF page 24. 8 A. Just the claim language? 9 Q. Claim language for Element B. 10 A. "Element B - The power socket is electrically 11 connected with the first connector, the second 12 connector, the center fan and the illumination area such 13 that when the power socket on the first side of the body 14 is supplied with power via the power socket's electrical 15 connection with the second connector the center fan in 16 the illumination area of the body of the first 17 illumination fan are respectively driven into rotation 18 and illumination." And then it goes on to C. 19 Q. To confirm, the recited power socket first 20 connector and second connector in Element B, they are 21 components of the claimed first illumination fan of 22 claim 6 and 7, correct? 23 A. Yes, because it follows on -- it is in 24 antecedent A which says, "The first illumination fan 25 comprises," and goes on for a while and then starts www.apusCR.com	Page 231 1 THE DEPONENT: Well, for the -- I mean, for the 2 fans to operate they have to be supplied with power in 3 some manner. 4 BY MS. QU: 5 Q. And which connector of the first illumination 6 fan needs to be connected to a power supply? 7 MR. CHEN: Objection. Form. 8 THE DEPONENT: So to conform with the claim -- 9 I mean, it does say that, "When the power socket on the 10 first side of the body is supplied with power via the 11 power socket's electrical connection with the second 12 connector the center fan in the illumination area of the 13 body of the first illumination fan are respectively 14 driven into rotation and illumination." 15 BY MS. QU: 16 Q. I am waiting for your answer. You just 17 repeated the claim language. Can you answer my 18 question? 19 A. Power is supplied to the -- in this claim power 20 is supplied to the power socket via the power socket's 21 electrical connection with the second connector. So the 22 second connector is the original source of power under 23 this -- this claim. 24 Q. Just to confirm, so under claim 6 and 7 the 25 second connector of the first illumination fan is the

Page 232 1 original source of power; is that right? 2 A. Yes, that's my reading. 3 Q. Does the 336 patent explicitly disclose that a 4 second connector receives power supply directly from an 5 external power source? 6 MR. CHEN: Document speaks for itself. 7 THE DEPONENT: The second connector of the 8 illumination fan can receive -- can receive power. 9 MR. CHEN: Surui, do you think you could 10 provide a copy of the 336 patent? 11 MS. QU: Well, I am asking Dr. Tuckerman's 12 opinion of the 336 patent and he seems to be able to 13 answer that. Please stop coaching the witness. Okay? 14 MR. CHEN: I am not coaching the witness. I am 15 asking for an exhibit. 16 MS. QU: The witness is still giving his 17 answer. He hasn't finished the answer. 18 MR. CHEN: I thought he had. 19 THE DEPONENT: I thought I had, but, you 20 know... 21 BY MS. QU: 22 Q. Is that his whole answer, that the second 23 connector of the illumination fan can receive power? 24 That was your whole answer? 25 A. That is my answer.	Page 234 1 is discussed that a second connector can receive power 2 from an external power source, please point that out to 3 me. I am not asking what is obvious. I am asking what 4 is explicitly disclosed in the specification. 5 MR. CHEN: Compound. 6 THE DEPONENT: Well, the second connector is -- 7 even in the embodiments that are shown in the figures 8 the second connector is receiving power from an external 9 power source. 10 BY MS. QU: 11 Q. Can you let me know which figure you are 12 referring to? 13 A. Because the fans would not operate if there 14 wasn't ultimately an external power source somewhere. 15 So -- 16 Q. Is that somewhere marked disclosing any figure? 17 MR. CHEN: Objection. Form. Asked and 18 answered. 19 THE DEPONENT: The figures do not explicitly 20 show where the power supply is connected, but a POSITA 21 would understand that there are -- there is -- that a 22 fan -- that the fan can receive power from the second 23 connector either from a preceding fan or from another 24 source. 25 BY MS. QU:
Page 233 1 Q. That is not my question, but I am happy to 2 provide you a copy of the 336 patent for sure. 3 A. That would be helpful. 4 Q. Okay. So I just dropped in the Chat box a copy 5 of what's been pre-marked as Exhibit 1001, which is the 6 336 patent. You can download it and take a look. And 7 my question for you is, where in the 336 patent there is 8 an express disclosure that a second connector can 9 receive power supply directly from an external power 10 source? 11 A. Well, because it either would understand that 12 that is -- that is possible from reading the patent. 13 Q. That is not my question. My question is 14 whether there is an explicit disclosure in the patent 15 specification? 16 MR. CHEN: Objection. Form. 17 THE DEPONENT: It may not be specified in 18 exactly those words, but it is plainly obvious that the 19 second connector can receive power certainly from a 20 preceding fan and a POSITA would completely understand 21 that it wouldn't have to be a preceding fan. It could 22 be a direct connection. 23 BY MS. QU: 24 Q. That is not my question. Again, if you see any 25 express disclosure in the patent specification where it	Page 235 1 Q. Is there any explicit disclosure in the wording 2 of the spec that says a second connector can receive 3 power supply from an external power source? 4 MR. CHEN: Vague and ambiguous as to "power 5 source." 6 THE DEPONENT: Well, for example -- I mean, 7 they talk about the power socket on the one side of the 8 body being supplied with power and so there has to be -- 9 a POSITA would understand there has to be a power supply 10 somewhere supplying that power socket. 11 BY MS. QU: 12 Q. Isn't that power socket 4? 13 A. In the figures 4 is identified as "power 14 socket." 15 Q. But not the second connector, which is labeled 16 6 in the figures, correct? 17 A. Well, they are all electrically connected. And 18 so a supplying power to the second connector effectively 19 supplies power to the power socket. 20 Q. And I'm asking whether there is an explicit 21 disclosure in the spec where the second connector, 22 number 6, receives power externally? 23 A. It does receive power ultimately from an 24 external power source. 25 Q. Where is that disclosed? Can you point that

Page 236 1 out to me? 2 A. It has to be, otherwise the second illumination 3 fan could -- could not operate if there was no external 4 power source. 5 Q. But it is not explicitly discussed in the spec, 6 correct? 7 MR. CHEN: Vague and ambiguous. 8 THE DEPONENT: I don't know what "it" is. 9 BY MS. QU: 10 Q. Can you point to me where in the spec there is 11 any expressed disclosure that a second connector is 12 directly connected to any external power supply? 13 A. Well, when you hook the two fans together the 14 first fan is functioning as a -- it is functioning as a 15 power supply for the second fan. So that's an external 16 power supply to the second illumination fan. 17 Q. Okay. 18 A. Since it is not -- 19 (Simultaneous colloquy.) 20 Q. Are there are there any other disclosures in 21 the patent spec? 22 A. I mean, I would have to -- I would have to 23 spend time reading the entire thing, but that -- it may 24 have been mentioned multiple times how the second -- how 25 the -- the -- well, what they call another illumination Volume 3 David B. Tuckerman, Ph.D.	Page 238 1 is not explicitly disclosed it certainly is -- would be 2 understood by a POSITA as -- as -- as an option. 3 BY MS. QU: 4 Q. What is an option? 5 A. That a fan can be -- a fan can be powered via 6 its second connector. That certainly is quite clear. 7 Q. And now I am asking, how is the second 8 connector supplied with power -- 9 A. It can -- 10 Q. -- as discussed -- as disclosed in the 336 11 patent? 12 A. It can be supplied by it from a preceding fan. 13 Q. Are there any other ways disclosed in the 336 14 patent? 15 A. A POSITA would certainly understand that that 16 can be done. 17 Q. That is not my question. My question is, other 18 than a power supply from a preceding fan to the second 19 supply of the first illumination fan is there any other 20 expressed disclosure in the 336 patent? 21 MR. CHEN: Objection. Form. 22 BY MS. QU: 23 Q. That a second connector of the first 24 illumination fan can be supplied with power? 25 A. Well, a POSITA reading the patent in its Thermaltake Technology Co. vs. Lian Li Industrial Co.
Page 237 1 fan or in the case of claim 6 and 7, the second 2 illumination fan. It -- there is at least one, perhaps 3 more, disclosures of how the second fan receives power 4 via its second connector. So, therefore, applying power 5 to the second connector operates the second fan. 6 Q. So the 336 patent specification only disclosed 7 that when the second connector of a fan -- only 8 disclosed that the second connector of a fan receives 9 power from a different fan, correct? That's the only 10 disclosure of an external power supply to the second 11 connector? 12 MR. CHEN: Compound. 13 THE DEPONENT: Well, the figures illustrate 14 that -- that configuration, but a POSITA would 15 understand that that is not the only configuration that 16 can be done. 17 BY MS. QU: 18 Q. I am only asking about the configuration 19 disclosed in the patent. So just to confirm again, is 20 the only explicit discussion or disclosure in the 336 21 patent specification for an external power supply to the 22 second connector through a different fan? 23 MR. CHEN: Asked and answered. Vague. 24 THE DEPONENT: Well, it certainly shows that 25 power can be supplied via the second connector and if it www.apusCR.com	Page 239 1 totality would understand that that is a perfectly 2 viable option. 3 Q. I'm not asking what a POSITA would infer. I am 4 asking whether there is any other explicit disclosure in 5 the patent specification, and if you are aware of any 6 please point that out to me. 7 MR. CHEN: Asked and answered. 8 THE DEPONENT: Well, when I read the patent in 9 the shoes of a POSITA I certainly understand that it is 10 an option. 11 BY MS. QU: 12 Q. But there is no explicit disclosure you can 13 point out to, correct? 14 MR. CHEN: Vague and ambiguous. 15 THE DEPONENT: I guess it depends on your -- 16 you know, your definition of "explicit." It was clear 17 enough to me. So it was explicit from my 18 interpretation. 19 BY MS. QU: 20 Q. Can you give me the line -- the column number 21 and the line numbers? 22 A. Well, I infer it from the various discussions 23 about the first fan connecting to the second connector 24 of -- and power and thereby powering up the second fan 25 via its second connector that any method of powering the

Page 240 1 second fan is feasible. 2 Q. So it is inferred but not explicit, correct? 3 A. A POSITA would understand that it is a viable 4 method of powering a fan. 5 Q. And so if you can turn to the PDF page 21 of 6 Exhibit 2054 -- 2054. 7 A. Which page? 8 Q. PDF page 21. 9 A. Okay. 10 Q. The figure on that page shows what you describe 11 as a preceding illumination fan providing power supply 12 to the second connector of the first illumination fan, 13 correct? 14 A. Well, I mean, the figure shows a preceding 15 illumination fan that would then -- it is called 16 "preceding" because it would then be connected to -- to 17 a second fan. 18 Q. What is a "second fan"? 19 A. Well, maybe I shouldn't call it the "second 20 fan," but they would be that a -- could you repeat your 21 question? 22 Q. Is the figure on this page -- page 21 of 23 Exhibit 2054 depicts the preceding illumination fan that 24 you describe as supplying power to the second connector 25 of the claimed first illumination fan?	Page 242 1 preceding illumination fan will be covered by the first 2 illumination fan, correct? 3 MR. CHEN: Vague and ambiguous. 4 THE DEPONENT: It would be abutting the -- 5 the -- a side of the first illumination fan. 6 BY MS. QU: 7 Q. And the power socket 4 of the preceding 8 illumination fan is not accessible to be supplied with 9 power, correct? 10 MR. CHEN: Lack of foundation. 11 THE DEPONENT: It is accessible to be supplied 12 with power from the second connector via the fact that 13 they are -- they are electrically connected. 14 BY MS. QU: 15 Q. Other than the second connector of the 16 preceding illumination fan can the power socket 4 of the 17 preceding illumination fan be supplied power in any 18 other way? 19 A. There are configurations where that can be 20 done. There's -- in prior testimony there was a figure 21 that I showed that I understand originated from 22 inventor's notes wherein the power socket could be 23 supplied with power with a cable. 24 Q. Are there any configurations that can allow 25 supply to power socket 4 of the preceding illumination
Page 241 1 A. Well, I don't know if I used exactly those 2 words. I mean, my report is self-explanatory. 3 Q. So you testified previously that the second 4 connector of the first illumination fan receives power 5 from a preceding illumination fan. And I am trying to 6 understand, is that what you depict on this page, the 7 preceding illumination fan? 8 A. That's how the figure is captioned. That is 9 what I'm talking about, sure. 10 Q. Okay. So for the second connector of the first 11 illumination fan to receive power from the preceding 12 illumination fan the first connector of the preceding 13 illumination fan must be connected with the second 14 connector of the first illumination fan, correct? 15 A. If they are connected together, yes. 16 Q. When the preceding illumination fan and the 17 first illumination fan are connected the red shaded 18 portion of the preceding illumination fan is covered by 19 the first illumination fan, correct? 20 MR. CHEN: Vague. 21 THE DEPONENT: Well, it -- it would abut -- the 22 red shaded area on the preceding illumination fan would 23 abut the first illumination fan. 24 BY MS. QU: 25 Q. And the opening of power socket 4 of the	Page 243 1 fan other than from the second connector of the 2 preceding illumination fan that is explicitly disclosed 3 in the 336 patent? 4 MR. CHEN: Vague. Asked and answered. 5 THE DEPONENT: I would have to take a quick 6 look at the patent here. 7 BY MS. QU: 8 Q. Sure. Take your time. 9 A. Well, let me just make sure I read the question 10 before I answer this. So in column 3, lines -- starting 11 with line 29 it says, "As a result what is assembled two 12 fans that could be independently used can be joined 13 together and power can be supplied by connecting the 14 power socket of one of the bodies with a power supply of 15 a computer." So I certainly take that to mean it could 16 be directly connected, as I mentioned, but of course it 17 can also be connected to the power supply via the 18 connection to the second connector. So I think the 19 answer is, yes, there is a configuration where the power 20 socket can be directly connected. 21 Q. Where is the discussion that when the power 22 socket 4 of the preceding fan on the side that is 23 covered or abuts, in your word, another fan, that power 24 socket 4 can be accessible with an external power 25 supply?

Page 244 1 A. Well, it can be -- the patent requires that the 2 power socket be supplied with power and it can be -- it 3 can be supplied indirectly. It can be supplied via its 4 electrical connection to the second connector. You 5 know, you could also imagine configurations where you 6 are supplying power to a first connector and the fan 7 would operate. So any method of powering up the power 8 socket, either directly or via its connection with the 9 second connector, for example, will allow the fan to 10 operate. 11 Q. And I'm asking is any method that is 12 contemplated by you explicitly discussed and disclosed 13 in the patent specification? 14 MR. CHEN: Asked and answered. Vague. 15 THE DEPONENT: The second connector -- I guess, 16 yeah. I mean, can you make the question a little bit 17 more concrete? 18 BY MS. QU: 19 Q. You're just repeating your counsel's objection 20 and that's not answering my question. And I would 21 caution Mr. Chen not to coach the witness again. 22 So let me go back to your declaration, 205 -- 23 sorry -- Exhibit 2054. And, again, we are on PDF page 24 21. And you testified previously that the second 25 connector of the first illumination fan -- of the first Volume 3 David B. Tuckerman, Ph.D.	Page 246 1 objected to my questions with explanation. So I 2 disagree that there is any coaching. If you and your 3 colleague object to my questions and said there was no 4 coaching and there is no coaching right now. So please 5 do not mischaracterize the record. Thank you. 6 MS. QU: For the record, the witness 7 repeatedly -- either repeat or paraphrased your 8 objections. So we -- so please keep your objections to 9 form. 10 THE DEPONENT: Well, I deny that I was being 11 responsive to the objection. The problem I have is, I 12 guess -- it is an issue of memory. When you ask a 13 complex question and then the next question is -- you 14 know, kind of refers to the previous question -- it is 15 like an antecedent for it, sometimes I am not quite sure 16 what is being asked. Because your question was, "And I 17 am asking is any method that is contemplated by you 18 explicitly discussed and disclosed in the patent 19 specification?" And, you know, what -- "any method that 20 is contemplated by you," in what regard? That was what 21 I was struggling with. So, anyway... 22 BY MS. QU: 23 Q. And, Dr. Tuckerman, you have realtime. And my 24 question was next to your answer saying any method that 25 allows the connection. And I am just trying to ask you Thermaltake Technology Co. vs. Lian Li Industrial Co.
Page 245 1 illumination fan receives power supply from the 2 preceding illumination fan. And my question is, when 3 the preceding illumination fan and the first 4 illumination fan are connected the red shaded portion is 5 covered. Isn't it true that power socket 4 is 6 inaccessible to receive power supply? 7 MR. CHEN: Surui, I was not coaching the 8 witness and the witness did not repeat my objection. So 9 please don't mischaracterize the record. Thank you. 10 MS. QU: I think the record is clear. The 11 witness -- 12 (Simultaneous colloquy.) 13 MS. QU: -- when he was -- 14 MR. CHEN: And vague and ambiguous. 15 (Simultaneous colloquy.) 16 MS. QU: -- your objection. 17 MR. CHEN: Compound. Vague and ambiguous. 18 Compound. Asked and answered. 19 MS. QU: Kyle, I think it is sufficient for you 20 to just object based on form. That is for the Board to 21 decide. You need not to lay out the specific reasons 22 and for the witness to repeat the same reasons and avoid 23 my question. 24 MR. CHEN: No, the witness did not repeat the 25 same reason and you coached and your colleague also www.apusCR.com	Page 247 1 to clarify what method is disclosed in the patent. 2 Anyway, we can start over. 3 So now we are on PDF page 21 of Exhibit 2054. 4 MR. CHEN: Can we take a break before you ask 5 the next question so that we are not taking a break 6 while a question is pending? Because it's been an hour 7 on the record. 8 MR. WEBER: The question is pending. We will 9 proceed until Ms. Qu is ready. 10 BY MS. QU: 11 Q. So let me -- 12 MR. CHEN: Is there a question pending? If 13 there is no question pending -- 14 MS. QU: There is. I haven't finished my 15 question yet and I have already started it. 16 MR. CHEN: You said that you -- 17 (Simultaneous colloquy.) 18 MS. QU: Do not interrupt my questioning. 19 (Simultaneous colloquy.) 20 MR. WEBER: Kyle, you need to stop talking when 21 Surui is talking. 22 BY MS. QU: 23 Q. So we are still on PDF page 21 of Exhibit 2054, 24 which depicts a preceding illumination fan that you 25 testified previously that supplies power to the second

Page 248 1 connector of the first illumination fan under claim 6 2 and 7. And my question is, when the preceding 3 illumination fan is connected with the first 4 illumination fan and the red portion -- the red shaded 5 portion of the preceding illumination fan abuts the 6 first illumination fan, isn't it true that power socket 7 4 of the preceding illumination fan cannot be accessible 8 to any external power supply? 9 MR. CHEN: Same objections. 10 THE DEPONENT: Well, it is accessible to an 11 external power supply via the connection to the second 12 connector for sure, and there can be configurations 13 where it is -- where a cable could be connected to 4 as 14 an alternative. 15 BY MS. QU: 16 Q. Okay. Let's focus on the latter half. 17 MR. CHEN: Can we take a break? There is no 18 question pending. 19 MS. QU: I haven't finished my line of 20 questioning and it is not yet an hour on the record. 21 Please do not interrupt my questions. 22 MR. CHEN: We did not -- I thought it is -- did 23 we not start at 1:00? 24 MS. QU: I haven't finished my questioning. 25 BY MS. QU: Volume 3 David B. Tuckerman, Ph.D.	Page 250 1 as an indirect connection. So that's -- that's my 2 source for that. 3 BY MS. QU: 4 Q. Does it explicitly disclose -- strike that. 5 So that's power -- the power socket there is 6 power socket 4, correct? 7 MR. CHEN: Same objections. 8 THE DEPONENT: Presumably power socket 4. 9 BY MS. QU: 10 Q. Anything else? 11 MR. CHEN: Same objections. 12 THE DEPONENT: Well, I mean, the pictures 13 showing 4 are preferred embodiments. I don't rule out 14 the power socket being positioned differently. I don't 15 rule out different means of access to that power socket. 16 BY MS. QU: 17 Q. Is the -- is the different positioning of power 18 socket ever disclosed in any figures or in the spec -- 19 specification? 20 MR. CHEN: Same objections. 21 THE DEPONENT: Well, a POSITA would 22 understand -- I mean, that -- a configuration does not 23 have to look identical to the figures to be covered by 24 the claims. 25 BY MS. QU: Thermaltake Technology Co. vs. Lian Li Industrial Co.
Page 249 1 Q. So let's focus on the latter half of your 2 answer where you just testified that in your opinion 3 there can be configurations where a cable could be 4 connected to power socket 4. And I'm asking, can you 5 point me to the explicit disclosure in the 336 patent 6 that allows that configuration? 7 MR. CHEN: Same objections. 8 THE DEPONENT: A POSITA would understand the 9 possibility of using that configuration. 10 BY MS. QU: 11 Q. That possibility is not explicitly disclosed in 12 the 336 patent, correct? 13 MR. CHEN: Same objections. 14 THE DEPONENT: I certainly read the patent to 15 allow that. 16 BY MS. QU: 17 Q. And your reading is not explicitly disclosed 18 if -- if you think there is any explicit disclosure can 19 you point me to the specific column and line numbers? 20 MR. CHEN: Same objections. 21 THE DEPONENT: Well, I would just go back to 22 the text of column 3, lines -- lines 30, 32. "Power can 23 be supplied by connecting the power socket of one of the 24 bodies with a power supply of a computer." And a POSITA 25 could read this as allowing a direct connection as well www.apusCR.com	Page 251 1 Q. So that different positioning is not explicitly 2 depicted or discussed in patent spec, correct? 3 MR. CHEN: Same objections. 4 THE DEPONENT: It is impossible to describe an 5 infinity of possibilities in a patent specification. 6 BY MS. QU: 7 Q. Yes. I agree the discussions in the patent is 8 not with infinity. And what you just described, a 9 different positioning of the power socket, is not 10 explicitly discussed or depicted in the patent 11 specification, correct? 12 MR. CHEN: Same objections. 13 THE DEPONENT: Well, I just go back to a POSITA 14 would understand that to be -- that the figures shown 15 are preferred -- preferred embodiments, but not the only 16 possible embodiments that are part of the invention. 17 BY MS. QU: 18 Q. And the figures depicted in patent 19 specification does not show any different positioning of 20 the power socket, correct? 21 MR. CHEN: Same objections. 22 THE DEPONENT: Well, they certainly show that 23 there is potential -- I don't know about the position 24 necessarily because in some figures that's covered up, 25 but you can see that in some cases there is an opening

Page 252 1 between the fans where a cable can be inserted. 2 BY MS. QU: 3 Q. Can you show me where fans are connected? 4 There is an opening between fans for an insertion of a 5 cable. Is that depicted anywhere in the patent? 6 MR. CHEN: Same objections. 7 THE DEPONENT: Well, I mean, I was referring to 8 figure 3 where there are clear openings that don't have 9 an engaging block in the way between the two fans. So 10 essentially an alternative configuration of the fan 11 where a cable -- a POSITA would understand the cable 12 could be inserted. 13 BY MS. QU: 14 Q. Your reading of figure 3 is that there is no 15 engaging blocks between the fans, correct? 16 MR. CHEN: Same objections. 17 THE DEPONENT: I didn't -- I don't think I said 18 that. I said an engaging -- that there does not appear 19 to be an engaging block in the way between the fans in 20 the context of putting in a cable. There certainly can 21 be engaging blocks between the fans that aren't -- that 22 wouldn't obstruct a cable. 23 MS. QU: Let's take a break now. I think we 24 are on the record for a little over an hour. 25 THE DEPONENT: Okay.	Page 254 1 MR. CHEN: Vague and ambiguous. 2 THE DEPONENT: Generally speaking it is what I 3 would call a passive element. 4 BY MS. QU: 5 Q. A diffuser does not receive power; is that 6 right? 7 MR. CHEN: Same objections. 8 THE DEPONENT: It -- that depends on what you 9 mean. It is receiving -- if it is used for illumination 10 it is receiving optical power. 11 BY MS. QU: 12 Q. A diffuser itself does not receive electrical 13 power; is that right? 14 MR. CHEN: Same objection. 15 THE DEPONENT: I would say that is often true. 16 I wouldn't rule out diffusers that, you know, have some 17 electrical control or something in their properties. 18 BY MS. QU: 19 Q. Usually you wouldn't see a diffuser that has 20 electrical connectors and received electrical power. 21 That is not what a diffuser is designed for, correct? 22 MR. CHEN: Same objections. 23 THE DEPONENT: Well, as the name implies, its 24 function is to diffuse the light, not to generate it. 25 That said, you might have a diffuser module, you know,
Page 253 1 (Off the record.) 2 BY MS. QU: 3 Q. Back on the record. Welcome back, 4 Dr. Tuckerman. 5 A. Thank you. 6 Q. Did you speak with anyone during the break 7 about your testimony? 8 A. No. 9 Q. Have you heard the term "diffuser"? 10 A. Yes. 11 Q. Can you tell me what a diffuser is? 12 MR. CHEN: Lack of foundation. 13 THE DEPONENT: I imagine that you're talking 14 about in the context of light illumination? 15 BY MS. QU: 16 Q. Yes. 17 A. So a diffuser is something that takes light and 18 scatters it through -- it is usually -- usually a solid 19 object that's translucent and -- but not transparent 20 usually. So it scatters light over, you know, the body 21 of the diffuser and it is a way of making light emission 22 over broader areas and less concentrated than, you know, 23 from a point source. 24 Q. A diffuser is not itself a light source; is 25 that right?	Page 255 1 containing light sources and there is -- power's going 2 into -- you know, connections going into the module or 3 something. 4 BY MS. QU: 5 Q. Yeah. And I am only asking about a diffuser 6 itself. 7 MR. CHEN: Same objections. 8 THE DEPONENT: Well, as I said, generally it is 9 a passive device; you know, receives optical power. 10 BY MS. QU: 11 Q. Okay. Thank you. And I just dropped in the 12 Chat box what's been pre-marked as Exhibit 1007. Let me 13 know when you have it. 14 A. Okay. I have it. 15 Q. So you recognize Exhibit 1007, correct? 16 A. I do. 17 Q. And what is it? 18 A. It is patent that we call "Tsuji" or patent 19 application, I guess -- translation from the Japanese. 20 Q. And the fan unit 10 disclosed in 2G -- each fan 21 unit 10 has connectors CNA, CNB, CNC and CND. Is that 22 right? 23 MR. CHEN: Document speaks for itself. 24 THE DEPONENT: That is the embodiments 25 depicted.

Page 256 1 BY MS. QU: 2 Q. For ease of our discussion maybe we can turn to 3 figure 7 of 2G and figure 7 is on PDF page 36. Let me 4 know when you're there. 5 A. I'm there. 6 Q. So connectors CNA, CNB, CNC, and CND are all 7 connected with power lines; is that right? 8 MR. CHEN: Same objections. 9 THE DEPONENT: That's not depicted in this 10 figure -- or is it? Oh, power lines, okay. They show 11 power lines going to those four connectors. 12 BY MS. QU: 13 Q. So connector CNA, CNB, CNC, and CND are 14 electrically connected, right? 15 MR. CHEN: Same objections. 16 THE DEPONENT: Well, this -- there is more 17 detail in other figures. 18 BY MS. QU: 19 Q. And I'm only asking about figure 7. And I just 20 want to confirm, are the four connectors electrically 21 connected through power lines? 22 A. They show power lines touching each of the 23 connectors. 24 Q. Okay. 25 A. That's not necessarily the same as saying Volume 3 David B. Tuckerman, Ph.D.	Page 258 1 of fan unit 10 on one side and the connector CND of fan 2 unit 10 on the other end." And let me look at your 3 question. So in Tsuji power is certainly transmitted 4 from fan unit -- let's see. Let me get the Cs and the 5 Ds right. Certainly Tsuji is configured for the 6 purposes of transmitting power from CND; a fan that is 7 on the right to CNC of a fan that's on its left. That's 8 how the patent basically works. 9 MS. QU: Okay. Okay. Thank you, 10 Dr. Tuckerman. I think that's all the questions I have 11 for you today. 12 THE DEPONENT: Oh, okay. 13 COURT REPORTER: Mr. Chen, did you have any 14 questions? 15 MR. CHEN: Yes. Can we take a break and 16 then -- let me look at the transcript and decide. Yeah, 17 I may have a couple questions. Can we take a 15-minute 18 break? Come back at 2:50? 19 MS. QU: Sure. 20 MR. CHEN: Okay. Thank you. 21 (Off the record.) 22 EXAMINATION BY MR. CHEN: 23 Q. I have just a couple of quick questions. So we 24 can get back onto the record. Dr. Tuckerman, do you 25 recall testifying about a diffuser earlier?
Page 257 1 electrically connected in -- you know, you would have to 2 look at context to get into the details of the nature of 3 electrical -- of the electrical connections. 4 Q. If you'd turn to paragraph 38 for me. 5 A. In Tsuji? 6 Q. In Tsuji. That's on PDF page 10. 7 A. Okay. 8 Q. And the last sentence of paragraph 38 reads, 9 "The two adjacent fan units 10 are connected so as to 10 enable power supply and transmission of the control 11 signal/monitoring signal by engaging the connector CNC 12 of fan unit 10 on one side and the connector CND of fan 13 unit 10 on the other end." Do you see that? 14 MR. CHEN: Document speaks for itself. 15 THE DEPONENT: I see that. 16 BY MS. QU: 17 Q. And I just want to confirm, can connector CNC 18 of one fan receive power from connector CND of another 19 fan? 20 MR. CHEN: The document speaks for itself. 21 Improper hypothetical. 22 THE DEPONENT: Okay. So it says, "The two 23 adjacent fan units 10 are connected so as to enable 24 power supply and transmission of the control 25 signal/monitoring signal by engaging the connector CNC www.apusCR.com	Page 259 1 A. Yes. 2 Q. Can a diffuser actively emit light? 3 A. It will emit light when illuminated by other 4 light sources such as LEDs. 5 Q. Dr. Tuckerman, can you turn to Exhibit 1007? 6 A. Okay. 7 Q. Please take a look at figure 7A in Exhibit 1007 8 on PDF page 36. 9 A. Okay. 10 Q. And please also take a look at figure 14 of 11 Exhibit 1007 on PDF page 43. 12 A. Okay. 13 Q. What is your understanding of the relationship 14 between figure 7 and figure 14 of Exhibit 1007? 15 A. Well, figure 7 is -- let me just search on 16 figure 7. So figure 7 -- like in paragraph 40 it 17 mentions figure 7 and then says, "Refer to figures 14 18 and 15." And then there is other places, I think -- 19 okay. Yeah, paragraph 81 refers to 7A and then goes on 20 to say, "As explained later," by referring to figure 14. 21 So in summary, figure 14 is a much more detailed circuit 22 diagram of -- you know, that goes into more detail on 23 how the connections work that were just very simply 24 illustrated in figure 7A. 25 Q. Thank you, Dr. Tuckerman. I have no further

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1 questions. 2 A. Okay. 3 MS. QU: I have no questions. 4 MR. CHEN: Okay. Thank you. So that concludes 5 today's deposition, I suppose? Okay. Thank you very 6 much. And we can go off the record, I guess. 7 (Volume III in the deposition of David B. 8 Tuckerman concluded at 2:54 p.m. PST.) 9 * * * 10 (NOTE: All quotations from exhibits are reflected 11 in the manner in which they were read into the record 12 and do not necessarily denote an exact quote from the 13 document.) 14 * * * 15 16 17 18 Volume 3 David B. Tuckerman, Ph.D. 19 20 21 22 23 24 25	1 DECLARATION UNDER PENALTY OF PERJURY 2 Case Name: Thermaltake Technology Co. 3 vs. Lian Li Industrial Co. 4 Date of Deposition: 11/25/2025 5 Job No.: 10178331 6 7 I, DAVID B. TUCKERMAN, PH.D., hereby certify 8 under penalty of perjury under the laws of the State of 9 _____ that the foregoing is true and correct. 10 Executed this _____ day of 11 _____, 2025, at _____. 12 13 _____ 14 DAVID B. TUCKERMAN, PH.D. 15 16 NOTARIZATION (If Required) 17 State of _____ 18 County of _____ 19 Subscribed and sworn to (or affirmed) before me on 20 this _____ day of _____, 20____, 21 by _____, proved to me on the 22 basis of satisfactory evidence to be the person 23 who appeared before me. 24 Signature: _____ (Seal) 25
1 REPORTER'S CERTIFICATION 2 3 I, Elizabeth A. Willis-Lewis, Certified 4 Shorthand Reporter in and for the State of California, 5 do hereby certify: 6 7 That the foregoing witness was by me duly 8 sworn; that the deposition was then taken before me at 9 the time and place herein set forth; that the testimony 10 and proceedings were reported stenographically by me 11 and later transcribed into typewriting under my 12 direction; that the foregoing is a true record of the 13 testimony and proceedings taken at that time. 14 15 IN WITNESS WHEREOF, I have subscribed my name 16 on this date: 12-02-2025 17 18 19 20 21  22 Elizabeth A. Willis-Lewis, CSR 23 24 25	1 DEPOSITION ERRATA SHEET 2 Case Name: Thermaltake Technology Co. 3 vs. Lian Li Industrial Co. 4 Name of Witness: David B. Tuckerman, Ph.D. 5 Date of Deposition: 11/25/2025 6 Job No.: 10178331 7 Reason Codes: 1. To clarify the record. 8 2. To conform to the facts. 9 3. To correct transcription errors. 10 Page _____ Line _____ Reason _____ 11 From _____ to _____ 12 Page _____ Line _____ Reason _____ 13 From _____ to _____ 14 Page _____ Line _____ Reason _____ 15 From _____ to _____ 16 Page _____ Line _____ Reason _____ 17 From _____ to _____ 18 Page _____ Line _____ Reason _____ 19 From _____ to _____ 20 Page _____ Line _____ Reason _____ 21 From _____ to _____ 22 Page _____ Line _____ Reason _____ 23 From _____ to _____ 24 Page _____ Line _____ Reason _____ 25 From _____ to _____

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