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

QUALCOMM INCORPORATED,)
 Petitioner)
) INTER PARTIES REVIEW NO.
VS.) IPR2021-00125
) PATENT 6,642,573
MONTEREY RESEARCH, LLC,)
 Patent Owner)

ORAL AND VIDEOTAPED DEPOSITION OF DR. JEFFREY BOKOR
NOVEMBER 19, 2021

ORAL DEPOSITION OF DR. JEFFREY BOKOR, produced as a
witness at the instance of the Petitioner and duly
sworn, was taken in the above-styled and numbered cause
on Friday, November 19, 2021, from 10:00 a.m. to
12:51 p.m., before JANALYN ELKINS, CSR, in and for the
State of Texas, reported by computerized stenotype
machine, in Austin, Texas, pursuant to the Texas Rules
of Civil Procedure and the Texas First Emergency Order
Regarding the COVID-19 State of Disaster, and any
provisions stated on the record herein.

A P P E A R A N C E S

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1 I'm a little unclear on that. But I was asked to -- to
2 use it.

3 Q. (BY MR. GREEN) Okay. So your -- your opinions
4 expressed in your report regarding the use of composite
5 materials are based on that claim construction. Is that
6 what you're saying?

7 MR. LEWIS: Objection, foundation.

8 THE WITNESS: For the most part, yes.

9 Q. (BY MR. GREEN) Are they ever not based on that
10 construction?

11 MR. LEWIS: Objection, foundation;
12 incomplete hypothetical.

13 THE WITNESS: I'm not exactly sure. I'd
14 have to look at every -- I'd have to look at every time
15 I use the word composite to make sure of that, but I'm
16 pretty sure that -- I'm pretty sure I did that. But I
17 can't rule out you're going to pull up an example of
18 somewhere where I refer to it in some other context.

19 Q. (BY MR. GREEN) I would never do that to you.

20 A. That's good to know. Thank you.

21 Q. Have you ever used the phrase "composite
22 dielectric" outside the context of this proceeding?

23 MR. LEWIS: Objection, scope.

24 THE WITNESS: Not to my recollection. But
25 I've published -- I've published, you know, hundreds of

1 research articles and I can't sit here and testify
2 that -- that I never used that term in any of my
3 publications.

4 Q. (BY MR. GREEN) Sure.

5 A. I sure don't recall doing so.

6 Q. Are you -- outside of just your publications,
7 let's just talk about your research in general. Are you
8 familiar with the concept of a -- I can't talk. Strike
9 that.

10 Are you familiar with the concept of a
11 composite material in the context of semiconductor
12 fabrication?

13 MR. LEWIS: Objection, scope.

14 THE WITNESS: Not in any detail. I'm not a
15 materials scientist and, you know, at best I'm an
16 amateur consumer of material science. So, you know,
17 generally speaking I'm familiar with the term, but the
18 details I'm not an expert in. It's a whole field of
19 material -- I'm aware there's a large field of material
20 science called composite materials. I'm not -- I'm
21 not -- I'm not particularly well versed in that field.

22 Q. (BY MR. GREEN) Okay.

23 A. That's the way, I guess, I'd like to say it.

24 Q. I'm going to say things wrong because I've only
25 read them and never heard them said out loud. Are you