

IPR2025-00437
Patent 10,788,690

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CAMBRIDGE INDUSTRIES USA, INC.,

Petitioner

v.

APPLIED OPTOELECTRONICS, INC.,

Patent Owners

Case: IPR2025-00437

U.S. Patent No. 10,788,690

**PETITIONER'S SECOND AMENDED NOTICE OF DEPOSITION OF
DR. ALAN E. WILLNER**

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that pursuant to the 37 C.F.R. § 42.53, Petitioner, Cambridge Industries USA Inc. by and through its counsel, will take the deposition of Dr. Alan E. Willner with regard to Inter Partes Review No. IPR2025-0437 for U.S. Patent No. 10,788,690. Dr. Willner has identified his address as: EEB 538, Dept. of Electrical Engineering, Viterbi School of Engineering, USC, LA, CA 90089-2565, 213-740-4664, F: 213-740-8729, willner@usc.edu.

The deposition will commence on Thursday, February 19, 2026, starting at 10:00 a.m. Pacific Standard Time or as otherwise agreed upon by the parties and continuing until complete via remote deposition means. The parties have agreed on this date, time, and manner for Dr. Willner's deposition. The deposition will be conducted remotely via Zoom, or other remote platform, before an officer authorized by law to administer oaths. The deposition will be recorded by stenographic and/or videotaped means, including the use of interactive real-time transcription. The court reporter and officer administering the oath will be remote from the witness. The witness shall not be in communication with or receive any direction from counsel outside of the remote deposition session platform.

An emailed link and credentials will be provided to allow the witness and participating counsel to join the remote deposition session using their own computer

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with microphone and webcam capability. Anyone who is unprepared to identify themselves and their association to this matter will not be allowed to join the remote deposition session. Any exhibits will be shared electronically with the witness and counsel via the remote deposition session platform.

In accordance with 37 CFR section 42.53(d)(5)(C), a list of exhibits which may be relied upon during the deposition is attached as Appendix A.

The scope and nature of the testimony to be elicited is directed to the scope of Dr. Willner's direct testimony, and in particular, cross examination of Dr. Willner's opinions as set forth in Exhibit 2004.

Date: January 27, 2026

By: /Nicola A. Pisano/

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Appendix A – List of Exhibits

Exhibit	Description
1001	U.S. Patent No. 10,788,690
1002	File History of U.S. Patent No. U.S. Patent No. 10,788,690
1003	Declaration of Dr. Kirk
1005	Wang Chinese Patent No. 208421455U
1006	English translation of Ex. 1005
1008	U.S. Patent No. 9,563,073
2004	Declaration of Alan E. Willner, Ph.D.
Paper 2	Petition for <i>Inter Partes</i> Review Under 35 U.S.C. §§ 311–319 And 37 C.F.R. § 42.104
Paper 14	Patent Owner Response to Petition for <i>Inter Partes</i> Review of U.S. Patent No. 10,788,690

Copies of Paper No. 2, and Exhibits 1001, 1002, 1003, 1005, 1006, and 1008 have previously been served on Patent Owner. Patent Owner is in control of Exhibit 2004 and Paper 14.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§42.6(e), 42.105, the undersigned hereby certifies that true and correct copies of the above-captioned PETITIONER'S AMENDED NOTICE OF DEPOSITION OF DR. ALAN E. WILLNER will be served on January 27, 2026, upon the Patent Owner at the correspondence address of record for the subject patent as listed on the USPTO's Patent Center via Priority Mail Express® at:

APPLIED OPTOELECTRONICS, INC.
13115 Jess Pirtle Blvd.
Sugar Land, TX 77478

and on Patent Owner's lead and backup counsel at the following address via Priority Mail Express®:

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