

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

SAMSUNG ELECTRONICS CO.,	)	
LTD.,	)	
	)	
Petitioner,	)	
	)	
	)	
vs.	)	No. IPR2025-01164
	)	No. IPR2025-01165
WILUS INSTITUTE OF STANDARDS	)	
AND TECHNOLOGY INC.,	)	
	)	
Patent Owner.	)	
-----	)	

VIDEO-RECORDED DEPOSITION OF CHRISTOPHER
HANSEN, Ph.D., taken remotely via Zoom at 9:02
a.m. Pacific Time, Thursday, April 9, 2026,
before Theresa JoAnn Phillips-Blackwell,
CSR 12700.

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2

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6 (Appearing via Zoom)

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25

1 I N D E X

2

3 DEPONENT EXAMINED BY PAGE

4 Christopher Hansen, Mr. Rubin 5

Ph.D.

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EXHIBITS

10

11 DESCRIPTION PAGE

12 2017 - Screenshot Taken from an Expert 50

Report Prepared by Paul Nikolich

13

2018 - Declaration of Dr. Harry Bims Dated 61

14 December 22nd, 2026

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1 (Remotely via Zoom; Thursday, April 9, 2026, 9:02 a.m.
2 Pacific Time)

3
4 THE VIDEOGRAPHER: We are now on the record.
5 This begins the video deposition of Dr. Christopher
6 Hansen in the matter of Wilus Institute of Standards &
7 Technology Inc. versus HP Inc. in the United States
8 District Court, for the Eastern District of Texas,
9 Marshall Division, Case 2:24-cv-00752-JRG-RSP.

10 Today is April 9th, 2026; and the time is
11 9:02 a.m. Pacific Daylight Time. This deposition is
12 being taken via Zoom at the request of Russ August &
13 Kabat. The videographer is Brad Bissegger of Magna
14 Legal Services, and the court reporter is Theresa
15 Phillips-Blackwell of Magna Legal Services.

16 Will counsel for the parties please state their
17 appearances and whom they represent.

18 MR. RUBIN: Good morning. This is Neil Rubin
19 of Russ August & Kabat representing the patent owner,
20 Wilus Institute of Standards & Technology.

21 MR. STEPHENS: Good morning. This is Nicholas
22 Stephens from Fish & Richardson representing the
23 petitioner, Samsung Electronics.

24 MR. WONG: Hi. This is Richard Wong, Fish &
25 Richardson, representing the petitioner as well.

1 THE VIDEOGRAPHER: Thank you.

2 Will the court reporter please introduce
3 themselves and swear in the witness.

4 DEPOSITION OFFICER: Hello, everyone. My name
5 is Theresa Phillips-Blackwell. I'm a California
6 certified shorthand reporter, CSR No. 12700.

7 Raise your right hand, please.

8 You do solemnly state that the evidence you
9 shall give in this matter shall be the truth, the whole
10 truth, and nothing but the truth?

11 THE WITNESS: Yes, I do.

12 DEPOSITION OFFICER: Thank you.

13

14 EXAMINATION

15

16 BY MR. RUBIN:

17 Q. Good morning, Dr. Hansen.

18 A. Good morning.

19 Q. I take it you've been deposed before?

20 A. Yes.

21 Q. How many times?

22 A. I believe about ten times.

23 Q. Okay. So would you say you're familiar with
24 the deposition process and the procedure that we'll be
25 following today?

1 A. Yes.

2 Q. Do you have any questions about the procedure,
3 things that you'd like me to go over?

4 A. No -- no questions, no.

5 Q. All right. Is there any reason that you cannot
6 give complete and accurate testimony here today?

7 A. Not that I'm aware of, no.

8 Q. You're not suffering from any illness or taking
9 any medication that would affect your memory or your
10 ability to understand and answer questions?

11 A. No.

12 Q. Thank you very much.

13 So today we've noticed your deposition for two
14 different IPRs that Samsung has filed against my client,
15 Wilus; and those are IPRs concerning the -- I guess
16 those IPR numbers, IPR 2025, dash, 00 -- I'm sorry --
17 dash 01164 and dash 01165.

18 You recall submitting declarations in those
19 IPRs?

20 A. Yes. I submitted a number of declarations.

21 Q. And do you have copies of those declarations
22 with you here today?

23 A. I -- I have my most recent -- well, I have
24 the -- I have my declaration for the -- the two -- I
25 think it's the '296 -- sorry -- the '262 patent in front

1 of me; and I have printed copies, I believe, of the
2 other declarations here.

3 Q. Okay. So the -- refer to the '262 patent, so
4 that's the IPR at issue in the 01164 IPR.

5 So you submitted a declaration there that's
6 Exhibit 1003 dated June 29th, 2025; is that right?

7 A. Yes. I believe that's correct, yes.

8 Q. And then you also submitted what's titled your
9 second declaration regarding public accessibility of
10 prior art. That's Exhibit 1015, also dated June 29th,
11 2025. Is that right?

12 A. Yeah. I have that one in a PDF file here. I
13 can open -- I can open that.

14 Q. Okay. So --

15 A. Yeah, I have that.

16 Q. Okay. So you have a printed copy of 1003?

17 A. That's right.

18 Q. And you have electronic copies of some other
19 materials?

20 A. That's right, yeah.

21 Q. Aside from 1003, do you have any other
22 printed --

23 A. I -- I have the -- I have a copy of the '262
24 patent printed --

25 Q. Okay.

1 A. -- here in front of me.

2 Q. All right. Anything else?

3 A. That's it.

4 Q. Okay. So what is it that you have electronic
5 copies of accessible to you?

6 A. I have electronic copies of the Exhibits 1001,
7 2 -- they're numbered to -- through 3101, a number of
8 exhibits.

9 Q. Okay. So you have -- is it your understanding
10 that that's all the exhibits that have been filed in the
11 1162 -- I'm sorry. All right. Withdrawn.

12 Is it your understanding that those are all the
13 exhibits that have been filed in the IPR concerning the
14 '262 patent?

15 A. I'm not certain. Those were the exhibits
16 provided by counsel to me, but --

17 Q. All right.

18 A. -- I believe that's likely they are.

19 Q. So you mentioned an Exhibit 3101.

20 Are there -- is there also an Exhibit 2016?

21 A. Yes.

22 Q. Okay. And -- all right. So turning back to
23 what your -- your declarations were. So we talked about
24 Exhibit 1015.

25 So then you also submitted a declaration that's

1 Exhibit 1018, a supplemental public accessibility
2 declaration of Christopher Hansen, February 16, 2026; is
3 that right?

4 A. Yes. I have that here.

5 Q. Okay. And then do you also have with you
6 documents from the other IPR I referenced, the one
7 concerning the '926 patent?

8 A. I believe I do, but I don't know the exact
9 numbers, so...

10 Q. Okay. Is there -- would there be a separate
11 folder that has exhibits from that second IPR or...

12 A. It's -- I was provided with one folder of
13 documents.

14 Q. Okay. Well, let's just ask about what the --
15 the declarations were.

16 So is it correct that you submitted two
17 declarations in the IPR concerning the '926 patent?

18 A. I believe that's correct, but I don't recall
19 exactly.

20 Q. All right.

21 MR. STEPHENS: Counsel, just to be sure, if --
22 if you do intend to reference those declarations, would
23 you mind sharing them through the chat?

24 MR. RUBIN: So I will -- I will share -- yeah.
25 For the witness's benefit and everyone else's, I'll --

1 I'll share any document that I have subsequent questions
2 about. Are you okay with me just asking about --

3 MR. STEPHENS: That's fine, yeah. I just
4 wanted to make sure --

5 MR. RUBIN: Well, actually, no. It's -- let
6 me -- I think the witness has testified that he has
7 copies of at least three of the declarations, but I'm
8 going to ask about these other two. I -- I'll share
9 them in the chat. Let's see here. All right. Bear
10 with me.

11 All right. So I just shared two PDFs in the
12 chat function with file names beginning in Exhibit 1029
13 and Exhibit 1031; so you may as well download those,
14 Dr. Hansen.

15 THE WITNESS: Yes. I'm downloading those now.
16 BY MR. RUBIN:

17 Q. All right. Are you ready?

18 A. Yes. Let me open them real quick. Okay. Yes,
19 I have them here.

20 Q. Okay. So Exhibit 2029 is from the IPR
21 concerning the '926 patent. It's a declaration titled
22 "Public Accessibility Declaration of Christopher Hansen,
23 Ph.D." dated June 20th, 2025.

24 Do you see that?

25 A. Yes.

1 Q. And you recognize that as a declaration you
2 submitted in the IPR?

3 A. Yes.

4 Q. All right. And then also uploaded the file
5 titled -- Exhibit 1031 is a -- or with the file name
6 beginning Exhibit 1031 is a PDF with the title
7 "Supplemental Public Accessibility Declaration of
8 Christopher Hansen, Ph.D." dated February 26, 2026.

9 Do you see that?

10 A. Yes.

11 Q. Do you recognize this as a declaration you
12 submitted in that IPR as well?

13 A. Yes.

14 Q. All right. And as far as you know, these five
15 declarations that we've talked about are the only
16 materials that you submitted -- or that you prepared to
17 be submitted in the -- in these two IPRs?

18 A. Yeah. Sitting here, those are the only ones I
19 can recall.

20 Q. All right. So focusing on Exhibit 1018 from
21 the '262 IPR and Exhibit 1031 from the '962 IPR, those
22 are both titled "Supplemental Public Accessibility
23 Declaration of Christopher Hansen, Ph.D.," both have the
24 same date, and both are 322 pages long.

25 As far as you know, are those two declarations

1 substantively the same? And by "substantively," I mean
2 the same except for references to different IPR
3 proceedings and different patent numbers.

4 A. Yeah. I believe the two documents cover the
5 same general topic, yes.

6 Q. Well, I guess when I look at the table of
7 contents -- well, all right. Let me restate the
8 question.

9 So they both are 322 pages long. When I look
10 at the table of contents, I see the same section titles,
11 the same page numbers. And as far as I can tell,
12 they're -- they have the same substance.

13 Sitting here today, are you aware of there --
14 of there being any difference in substance? Let me also
15 point out the list of appendices are identical on Page 3
16 of each declaration.

17 A. Yeah. I'm not aware of -- sitting here today,
18 I'm not aware of a specific difference other than the --
19 the -- the specific IPR that -- and the patents that
20 they're -- you know, cases that they're related to. But
21 yeah. I believe the information is -- in -- contained
22 in the two documents is -- is largely -- most likely
23 largely the same.

24 Q. Okay. So, Dr. Hansen, where are you currently
25 employed?

1 A. Covariant Corporation.

2 Q. And you're the president of Covariant; is that
3 right?

4 A. Yes. It's my consulting company.

5 Q. Okay. And how much of the consulting work that
6 you do is expert witness work or otherwise related to
7 litigation?

8 A. I would estimate about 40 to 50 percent of the
9 work I do is related to expert witness and litigation.

10 Q. And I think that you describe in your
11 declarations that Covariant provides expertise on 802.11
12 standards and product development.

13 Would you agree with that characterization?

14 A. Yes. I believe that's correct, yes.

15 Q. And setting aside the litigation-related work,
16 what percentage of your consulting work is related
17 to the 802.11 standards?

18 DEPOSITION OFFICER: I'm sorry. Related to
19 what?

20 MR. RUBIN: 802.11 standards and product
21 development.

22 THE WITNESS: Yeah. I would say about -- yeah.
23 Thirty to forty percent of my work is currently related
24 to 802.11 standards and product development.

25 ///

1 BY MR. RUBIN:

2 Q. And 30 to 40 percent of your non-litigation
3 work; is that correct?

4 A. No. I think really the bulk of my
5 non-litigation work is -- is related to product
6 development and -- and 802.11 standards.

7 Q. Now, you say that you have been a voting member
8 of the IEEE 802.11 working group since 2000; is that
9 right?

10 A. Yes. Yes, since 2000. That's correct.

11 Q. And you were vice chair of the 802.11ad task
12 group; is that right?

13 A. Yes, I was.

14 Q. What was your role, if any, in the 802.11ax
15 task group?

16 A. As I recall, I was a voting member of the
17 802.11 working group during the time 802.11ax was
18 developed. I attended multiple 802.11ax meetings, and I
19 voted on the 802.11ax draft.

20 Q. How many votes would you have participated in
21 as part of your work related to 802.11ax?

22 A. Yeah. I -- I -- I don't understand the
23 question. Which votes are you referring to?

24 Q. Well, I mean, was it just one vote up or down
25 on the final standard; or were there, you know, multiple

1 questions that you --

2 A. Okay. There -- right.

3 There were multiple votes on drafts that -- the
4 drafts of the amendment -- 802.11 amendment. And I'm
5 sure I also participated in the floor votes of the task
6 group, but I don't remember exactly how many of those
7 would have been.

8 Q. So you were retained by Fish & Richardson on
9 behalf of Samsung to provide opinions in these two IPRs;
10 is that right?

11 Sorry. Did you hear the question?

12 A. Yes. Looking at one thing here before I
13 answer.

14 Q. Okay.

15 A. Yes. I was retained by Fish & Richardson on
16 behalf of Samsung Electronics.

17 Q. All right. Do you know how many IPRs you've
18 submitted declarations regarding -- in the IPRs brought
19 by Samsung against Wilus?

20 A. I don't recall the exact number of
21 declarations.

22 Q. You say that you're being compensated at your
23 standard consulting rate for this work.

24 What is your hourly rate for this --

25 A. For this work it's five -- \$500 per hour.

1 Q. And I'm guessing it may be difficult for you to
2 break down the number of hours by declaration or by
3 specific IPR, but approximately how many hours have you
4 spent on the Wilus-related IPRs in total to date?

5 A. Yeah. I don't -- I don't recall the exact
6 number. I would expect it's -- you know, out all of --
7 all the -- all the IPRs -- Wilus IPRs, it would be in
8 the neighborhood of, you know, more than a hundred
9 hours.

10 Q. More than 200?

11 A. Most likely between 100 -- I would estimate
12 it's between 100 and 200. Could be close to 200; but
13 yeah, I don't recall the exact number.

14 Q. Prior to these IPRs had you been ever been
15 engaged by Fish & Richardson to be an expert witness?

16 A. I believe I have, but I -- I don't recall
17 specifically.

18 Q. How many cases would be your -- what would you
19 think it is?

20 A. I'm going to imagine it's one or two other
21 cases.

22 Q. So in your second declaration, Exhibit 1015,
23 you offer some opinions about a draft D1.0 to the
24 802.11 -- or -- in several of your declarations in these
25 IPRs, you offer opinions about a draft D1.0 of what

1 ultimately became the 802.11ax standard.

2 Do you recall that?

3 A. Yes. That's correct.

4 Q. So if I refer to D1.0, you'll understand what
5 document I'm referring to?

6 A. Yes.

7 Q. And you explain in your second declaration,
8 Exhibit 1015, that D1.0 was submitted for letter ballot
9 voting in a vote which opened in December 1st, 2016.
10 Does that sound right? I guess I'm referring to Page 30
11 of your Exhibit 1015.

12 A. Right. As I stated, Paragraph 54, that letter
13 ballot entitled "Tactical TGax Draft 1.0" opened on
14 December 1st, 2016.

15 Q. And -- and that was letter ballot 2025 -- I'm
16 sorry -- twenty twenty -- or -- withdrawn.

17 That was letter ballot 225; correct?

18 A. Yes. Yes, letter ballot 225.

19 Q. And did you vote on that letter ballot?

20 A. As I recall, yes, I believe I did.

21 Q. Did you submit any comments on that letter
22 ballot?

23 A. Yes, I believe I did.

24 Q. Any of those comments relate to trigger-based
25 PPDU BSS color setting?

1 A. I don't recall specifically, but I don't
2 believe they did.

3 Q. You submit any comments related to BSS color
4 more generally?

5 A. I don't recall submitting any comments on BSS
6 color.

7 Q. All right. Share this in the chat. All right.
8 So I just shared in the chat, I think -- yeah, what you
9 should also see on the screen, which is Exhibit 2011 in
10 the '262 IPR, which is a IEEE 802.11 document identified
11 in a -- upper right-hand corner with a string of
12 characters 18/0367r1.

13 You see that?

14 A. Yes, I see that there.

15 Q. And it's dated March 2018.

16 A. Yes, I see that.

17 Q. And I guess specifically dated March 1st, 2018,
18 titled "Resolutions to CIDs in 27.5.3.3."

19 Do you see that?

20 A. Yes, I see that.

21 Q. Do you know if you were at the meeting where
22 this submission would have been considered?

23 MR. STEPHENS: Counsel, I'll just object to the
24 line of questioning on this document. To my knowledge,
25 this was not a document that Dr. Hansen had addressed in

1 his declaration.

2 THE WITNESS: Yeah. I'm not sure I understand
3 exactly which meeting you're referring to. Are...

4 BY MR. RUBIN:

5 Q. Well, you've -- you've seen documents of this
6 form that were submitted to the 802.11ax task group?

7 A. Yes.

8 Q. And would the date on the document indicate the
9 date of the meeting the document was to be considered
10 in?

11 A. No. I -- I -- I don't believe -- I mean, not
12 necessarily. The dates are -- the dates on the
13 documents may not -- may not match the date that this
14 was presented or considered in an 802.11 meeting.

15 Q. Are you aware that the '262 patent and the
16 other patents that are challenged in IPRs that you
17 submitted declarations for are also asserted in district
18 court lawsuits that have been filed by Wilus against
19 Samsung?

20 A. I'm aware there are -- there's -- were lawsuits
21 or are lawsuits related to some of these patents as
22 well, yes.

23 Q. And do you know whether the -- withdrawn.

24 Do you know whether the D1.0 prior art
25 reference is also asserted as prior art in district

1 court litigation?

2 A. I don't know.

3 Q. As your -- as part of your work related to
4 these IPRs, have you ever seen declarations -- well,
5 withdrawn.

6 As part of your work related to the Samsung
7 IPRs against Wilus, have you ever seen a declaration as
8 prepared by a Samsung expert Harry Bims?

9 A. I don't believe I have.

10 Q. Do you have any knowledge of whether Dr. Bims
11 has offered expert opinions on behalf of Samsung
12 concerning the public availability of the D1.0
13 reference?

14 MR. STEPHENS: Objection. Scope. Form.

15 THE WITNESS: Yeah. I -- I don't know.

16 BY MR. RUBIN:

17 Q. And as part of your work on -- in connection
18 with Samsung's IPRs against Wilus, have you ever seen an
19 expert report submitted by Paul Nikolich?

20 MR. STEPHENS: Objection. Form. Scope.

21 THE WITNESS: Yeah. I don't believe I have.

22 BY MR. RUBIN:

23 Q. Do you recognize the name Paul Nikolich?

24 A. Yes.

25 Q. Who is Paul Nikolich?

1 A. If I remember correctly, Paul Nikolich is
2 formerly the chair of IEEE 802.

3 Q. And did you ever interact with him personally
4 in his role as chair of IEEE 802?

5 MR. STEPHENS: Objection. Form. Scope.

6 THE WITNESS: Yeah. I -- I believe I had lunch
7 with him once. You know, at the IEEE meetings, they're,
8 like, group lunches; and I happened to sit next to him
9 once and talk to him. That's all I recall.

10 BY MR. RUBIN:

11 Q. Do you know how long Paul Nikolich was chair of
12 802?

13 A. No.

14 Q. So I take it that at least prior to me asking
15 questions alluding to the issue, you had no knowledge of
16 Paul Nikolich had submitted an expert report addressing
17 the public availability of D1.0 in the district court
18 litigation between Wilus and Samsung?

19 A. Yeah. I -- I wasn't aware of a report -- of
20 that report.

21 Q. So you received your Ph.D. in 1997; is that
22 right?

23 A. Yes. That's correct.

24 Q. And before that, you received a master's degree
25 in electrical engineering 1989; is that right?

1 A. Yes. That's correct.

2 Q. And was there a period of time between when you
3 received your master's degree and when you started your
4 Ph.D. where you worked as an engineer?

5 A. Yes. Uh-huh.

6 Q. And that work was on wireless communication
7 devices in one form or another?

8 A. Right. Some of that work was, yes.

9 Q. So setting aside your time as a student, fair
10 to say that you have over 30 years of experience working
11 on wireless communication systems at this point?

12 A. Yes. I think so.

13 Q. From your experience as a member and as a
14 leader in IEEE 802.11 working group and task groups --
15 in your experience, what's the typical level of
16 experience of people who participate in these meetings?

17 A. I -- I would say that the -- there's certainly
18 a wide range. There are new graduates from college, you
19 know, all the way up to, you know, older folks like
20 myself. So there's a whole -- there's a whole range.

21 Q. Would you agree that most commonly people have
22 some level of experience in their career before they
23 begin working on the standards activities at the IEEE?

24 MR. STEPHENS: Objection. Form.

25 THE WITNESS: Yeah. I -- I would say some do,

1 some don't. It really varies.

2 BY MR. RUBIN:

3 Q. Well, I mean, I'm not sure if that's answering
4 my question. Some do, some don't might be consistent
5 with it being most common with they're experienced or
6 might not.

7 Would you agree that people most often have
8 proverbial gray hairs before they become involved in --

9 A. No. Yeah. No. I mean, I didn't have gray
10 hair when I started working at 802.11 standards,
11 although I do now. It's -- it's also very common to
12 have recent -- recent college -- like, young people in
13 their 20s at meetings as well as people my age.

14 Q. Where were you working when you first became --
15 well, withdrawn.

16 So you first became a voting member of the
17 802.11 working group in 2000; is that right?

18 A. Yes. I believe that's correct.

19 Q. Where were you working at that time?

20 A. I was working at Broadcom Corporation.

21 Q. And do you know what your title was at Broadcom
22 at that time?

23 A. I believe it was senior staff scientist.

24 Q. So when you first became a 802.11 working group
25 member, you were a -- you were what Broadcom considered

1 as a senior staff scientist?

2 A. Right. I was hired as a senior staff scientist
3 at Broadcom.

4 Q. And how many 802.11 working group meetings did
5 you attend before you became a voting member?

6 A. I believe -- I believe I became a voting member
7 at -- at the third meeting I attended.

8 Q. Third meeting.

9 And you explain in your second declaration,
10 Exhibit 1015, that to become a voting member required
11 attending at least three meetings with at least two of
12 those meetings being plenary sessions; is that right?

13 A. Yes. I believe that's correct.

14 Q. And in Paragraph 62 of your second declaration,
15 you indicate the locations of plenary and interim
16 meetings are held in 2016 and 2017. For example, you
17 list Macaw and Waikoloa, Hawaii; San Diego; Warsaw,
18 Poland; and so on.

19 At that time, to count as attending the
20 necessary three meetings, a person would have needed to
21 attend meetings in places such as these in person; is
22 that right?

23 A. Yes. In two thousand -- as I recall, in 2016
24 it would be required to -- to attend the meetings in
25 person.

1 Q. So turning back to your -- let's call it your
2 first declaration, Exhibit 1003, you say in
3 Paragraph 31, "My analysis in this declaration is
4 offered from the vantage point of a POSITA."

5 DEPOSITION OFFICER: Of a what?

6 MR. RUBIN: POSITA.

7 DEPOSITION OFFICER: Oh, got it.

8 MR. RUBIN: P-O-S-I-T-A, all caps.

9 BY MR. RUBIN:

10 Q. Do you see that?

11 A. Yes. I see that in Paragraph 31.

12 Q. And the paragraph above that you offer the
13 opinion that "A POSITA would have had a bachelor's
14 degree in electrical engineering, computer engineering,
15 computer science, or a related field, and at least three
16 years of experience in research, design or development
17 of wireless communication devices, systems, and/or
18 networks, or the equivalent."

19 You see that?

20 A. Yes, I see that.

21 Q. All right. So at least in Paragraph 31, you
22 say your analysis is offered from the vantage point of
23 somebody with a bachelor's degree and at least three
24 years of experience.

25 Would you agree?

1 A. Right. Qualified by Paragraph 3, where it also
2 says also increased educational experience can make up
3 for less work experience and vice versa, but...

4 Q. Okay.

5 A. Right. POSITAs.

6 MR. RUBIN: Now, in Paragraph 52 you say
7 that -- and actually, withdraw that.

8 This might help the court reporter if I share
9 the documents in the chat. At least so far the exhibits
10 that I've referred to or shown on the screen are all
11 already of record in the IPRs, so they don't need to be
12 attached to the transcript. But if there's anything new
13 that I designate, I'll -- I'll try to make that clear.
14 BY MR. RUBIN:

15 Q. All right. So on the screen you can see
16 Paragraph 52, where you say as part of your analysis for
17 this declaration, I have considered the following. And
18 then you include your own knowledge and experiences
19 gained from your work experience in the field of the
20 '262 patent and related disciplines, including work you
21 performed reviewing and voting on the 802.11ax standard
22 as it was developed.

23 Do you see that?

24 A. Yes, I see that.

25 Q. All right. So in doing your work in this case,

1 do you -- you considered experience that you've had
2 working in the field for over 30 years, including many
3 years working on the 802.11ax standard and other 802.11
4 standards; correct?

5 A. Right. As I say, as part of my knowledge to
6 this declaration, yeah, I've considered -- yeah, my own
7 knowledge and experience gained from work experience in
8 the field of the '262 patent and related disciplines.

9 Q. All right. So your vantage point is not
10 actually the vantage point of the -- the hypothetical
11 person of ordinary skill in the art that you've opined
12 on; right? You have considerably more experience and
13 education than that person of ordinary skill in the art.
14 You'd agree?

15 MR. STEPHENS: Objection. Form.

16 THE WITNESS: Well, you know, as I state in
17 Paragraph 32, based on my experiences, I believe I have
18 a good understanding of the capabilities of a POSITA.
19 Obviously, I have more experience than a POSITA.

20 BY MR. RUBIN:

21 Q. Turning to your table of contents for your
22 first declaration, there's the Section A where you list
23 various prior art references -- six prior art
24 references, to be exact.

25 A. Yes. I see that.

1 Q. So there's the D1.0 reference we've talked
2 about, there is Yang reference, and then there's four
3 other 802.11-related references.

4 Do you see that?

5 A. Yes, I see those there.

6 Q. All right. And so there is -- 802.11-2016 is
7 one of those references.

8 Do you see that?

9 A. Yes, I see that.

10 Q. And then there are three other 802.11-related
11 documents with names that have lots of numbers in them.
12 If I refer to those as the 0250 reference, the 1415
13 reference, and the 0230 reference, you'll understand
14 what I'm referring to?

15 A. Yes. That's fine.

16 Q. And so there I'm just using the -- the
17 four-digit numerical identifier after the slash in the
18 title of the -- or in the -- in the identifier for the
19 document; correct?

20 A. Okay.

21 Q. So here is one of the references, the 0250
22 reference. It's Exhibit 1007.

23 You see that on your screen?

24 A. Yes, I see it.

25 Q. And so the title on this document is "Proposed

1 Resolution for Comments Related to Various CIDs in
2 27.5.2."

3 You see that?

4 A. Yes, I see that.

5 Q. And then two of the other documents -- two of
6 the other prior art references you address, the 1415
7 reference and the 0230 reference also have titles that
8 begin "Proposed Resolution." So I may refer to those
9 three references collectively as the proposed resolution
10 references.

11 Would that be okay?

12 A. Okay. I mean, these came in at different
13 times; but yeah, that's -- it's okay.

14 Q. Okay. If -- if it's ever confusing what I'm
15 referring to, please ask me to clarify.

16 And so the -- the three proposed resolution
17 prior art references -- those are submissions made to
18 the 802.11ax working group proposing specific edits to
19 the text of the 802.11ax draft to resolve comments that
20 had been made about the draft.

21 Would that be an accurate characterization?

22 A. Well, no. I think that that's vague. I think
23 that's too vague.

24 Q. Okay. So what would you -- what would be your
25 explanation of what these three documents are -- the

1 prior art references that you opine on --

2 A. Okay. I --

3 Q. -- proposed resolution?

4 A. All right. Let's -- let me open the three
5 references here. So I see the Exhibit 1007 in front of
6 me.

7 Q. Yeah. I guess the others I'm asking about
8 would be Exhibit 1008 and 1010.

9 A. 1010.

10 Okay. What I have here as 1010 802.11.16 2016.
11 The standard --

12 Q. No. You're right. I'm sorry. 1011.

13 A. 1011. Okay.

14 Can you repeat the question.

15 Q. So -- I mean, I can try to frame it a little
16 more clearly.

17 Exhibits 1007, 1008, 1011, which are three of
18 the prior art references you offer opinions on, are
19 submissions that were made to the 802.11ax task group
20 proposing specific edits to the text of the draft of
21 802.11ax to resolve comments that had been made about
22 the draft.

23 Would that be an accurate characterization?

24 A. I think -- I don't think that's quite accurate
25 because these documents came in at different times

1 and -- and we're referring to -- and weren't all
2 necessarily related to the same draft, so...

3 Q. All right. So your -- your objection to my
4 question is the potential implication that they're all
5 addressing the same draft, but I take it you agree that
6 these are submissions that were made to the 802.11ax
7 task group proposing specific edits to the text of
8 drafts of 802.11ax to resolve comments that had been
9 made about those drafts.

10 Would that be an accurate characterization?

11 A. No. I would say that some of the documents
12 introduce new material and some other documents contain
13 edits or changes.

14 MR. RUBIN: Would this be a good time to take a
15 break?

16 DEPOSITION OFFICER: Yes, please.

17 THE WITNESS: Sure.

18 MR. RUBIN: All right. Let's go off the
19 record.

20 THE VIDEOGRAPHER: We're off record at
21 10:12 a.m.

22 (A recess is taken.)

23 THE VIDEOGRAPHER: Back on the record at
24 10:28 a.m.

25 ///

1 BY MR. RUBIN:

2 Q. Hello again, Dr. Hansen.

3 A. Hello.

4 Q. So the D1.0 reference -- this was a draft under
5 consideration -- withdrawn.

6 The D1.0 reference -- would you agree this was
7 a draft that was prepared of what would ultimately
8 become the 802.11ax standard?

9 A. 802.11ax 1.0 was a -- was a draft that would
10 eventually become 802.11ax -- that amendment to 802.11,
11 yes.

12 Q. Okay. Got it. Yeah.

13 So 802.11ax was an amendment to the existing
14 802.11 standard, and the 1.0 was a draft of that?

15 A. Yes. That's correct.

16 Q. Okay. And D1.0 was circulated to the working
17 group to be voted on; is that right?

18 A. The 802.11 Draft 1.0 was made available to the
19 working group and others. The vote -- that particular
20 vote would have been limited to the 802.11 working
21 group.

22 Q. And if that draft had been -- had received a
23 sufficient number of positive votes or potentially a few
24 negative votes, it could, in principle, have been
25 adopted as an amendment to the 802.11 standard; is that

1 right?

2 A. That's not -- typically, there's multiple
3 stages of review after -- even -- even -- even for an
4 approved draft. So typically, it would go through
5 multiple stages of review and comment before becoming
6 adopted as an amendment.

7 Q. I guess, would there have ultimately been a
8 further vote by a different body at IEEE before it was
9 finally adopted as an amendment? Like, does 802.11 as a
10 whole have to approve the work of the ax working group?
11 I'll withdraw the question. Never mind.

12 So the 0250 reference, Exhibit 1007, is a
13 submission that was proposing comment resolutions for
14 the D1.0 draft; right? Maybe I can point you to
15 something specific. If you look at Page 2 of Exhibit
16 1017, up at the top there's language -- the heading
17 interpretation of a motion to adopt, and it refers to
18 changed or added material being accepted to the TGax
19 draft.

20 A. Right. Can you repeat the question.

21 Q. Well, I guess, do you know -- so this document,
22 Exhibit 1007, at the top of the second page refers to
23 changes or additions being made to the, quote, TGax
24 draft.

25 And do you know whether the TGax draft referred

1 to here would have been D1.0 or some other draft?

2 A. I believe the -- the -- these comments were
3 addressed to Draft 1.0, but this specific -- if --
4 scrolling down to Page 12 in that document -- right? --
5 it specifically spells out these changes are made to
6 Draft 1.1.

7 Q. So the edits indicated on Page 12, for example,
8 with strike-throughs and underlined text are proposed
9 edits to Draft D1.1, not a later draft of the 802.11
10 standard and Draft D1.0; correct?

11 A. Yeah. My understanding is after Draft 1.1 --
12 1.0, rather, that there were a set of changes that were
13 made and the editor created a Draft 1.1. And then --
14 and then these -- these new changes would have been made
15 to that -- would have been based upon that Draft 1.1.

16 DEPOSITION OFFICER: I believe we lost
17 Mr. Rubin.

18 THE VIDEOGRAPHER: Sorry. I couldn't get
19 unmuted. Do you want to go off the record?

20 MR. STEPHENS: Go ahead and -- we can go off
21 the record.

22 THE VIDEOGRAPHER: Off the record at 10:38 a.m.

23 (A recess is taken.)

24 THE VIDEOGRAPHER: Back on the record at 10:41.

25 ///

1 BY MR. RUBIN:

2 Q. Okay. All right. So you should see on your
3 screen a portion of your first declaration,
4 Exhibit 1003; and here you introduce 0250 reference;
5 and, in particular, you quote -- or you cite to
6 Page 17 -- you cite and quote from Page 17 of that
7 reference.

8 You see that?

9 A. Yes, I see that there.

10 Q. And -- and here on the screen we see the text
11 that you're citing to on Page 17. So there are some
12 differences proposed to the text of this
13 Section 27.5.2.3, the underlining here.

14 Do you see that?

15 A. Yes, I see the underlined text.

16 Q. And so here on -- in Paragraph 256 you quote
17 portions of the 80250 reference. And then turning back
18 to Paragraph 125 of your declaration, here you're
19 discussing the same limitation and Limitations 1.4, 1.9
20 of the '262 patent and you're pointing to the same
21 Section 27.5.2.3 in the D1.0 reference.

22 You see that?

23 A. Yeah. I see in Paragraph 125 where I'm quoting
24 from the Draft 1.0 reference.

25 Q. So do you see any substantive difference

1 between the language of 27.5.2.3 that you rely on from
2 the D1.0 reference to satisfy this limitation of the
3 claims in the set of grounds where you use the D1.0
4 reference and the language at Section 27.5.2.3 in the
5 0250 reference that you rely upon for the -- those
6 grounds?

7 A. Yeah. Can you repeat the question again.

8 Q. So -- maybe I can make it a little simpler.

9 So there are certain grounds inset here where
10 you rely on -- let me withdraw.

11 So Grounds 1A and 1B rely on the D1.0
12 reference. Grounds 2A and 2B rely on the 0250
13 reference. Both of those grounds you're pointing to
14 Section 27.5.2.3 of draft language of the 802.11ax
15 amendment, but there's some change in the wording
16 between that section as appears in 2 point -- or I'm
17 sorry -- in D1.0 and that section as it appears in 0250.

18 In your opinion, does the change in the wording
19 make any difference to your obviousness opinions?

20 MR. STEPHENS: Objection to form.

21 BY MR. RUBIN:

22 Q. Is it material as it relates to the issues you
23 opine on in this here?

24 MR. STEPHENS: Objection --

25 THE WITNESS: Yeah. I would say both -- you

1 know, both references, you know, render those portions
2 of the -- you know, or -- you know, make -- to a person
3 of ordinary skill in the art, make -- make it obvious
4 that it's -- it's -- yeah. I'm not -- yeah. I think
5 they -- they both -- they're very similar, and they both
6 render it -- render the claim -- those portions of the
7 claim obvious.

8 BY MR. RUBIN:

9 Q. So sitting here today, can you -- are you aware
10 of any difference between the two versions of
11 Section 27.5.2.3 in the two different references
12 contained in that section that you offer opinions on
13 that make any difference to you -- to your opinions
14 concerning obviousness based on that section?

15 A. I would say both reasons -- you know, based
16 obviously -- sitting here today, I don't -- I don't
17 think -- I'm not aware of a specific change in the text
18 that -- to those two versions that, you know, make --
19 that are -- that are -- you know, would change my
20 analysis here. I think it's the same -- virtually the
21 same.

22 Q. All right. So should see on the screen
23 Exhibit 1008. I also just shared that in the chat. And
24 so 1008 for some reason lists as -- well, withdrawn.

25 So 1008 -- this is the 1415 reference -- one of

1 the proposed resolution references.

2 You see that?

3 A. Yes, I see that.

4 Q. For some reason it lists a date on the first
5 page of June 30th, 2025.

6 Do you know why that would be?

7 A. No. I'm not certain. It's -- it -- yeah. I'm
8 not -- I'm not certain. I do know that, in general, the
9 dates -- the documents don't -- these -- these dates on
10 these documents don't necessarily line up with when they
11 were uploaded on the file server, when they're presented
12 in the meetings.

13 Q. And what's your evidence as to when this
14 Document 1415 was first available to the public? Do you
15 know?

16 A. I -- I do have -- I'm not certain that this is
17 the only reference, but in -- in Exhibit 1029 I have
18 evidence there that this document was discussed. It
19 starts on Page 124, extends down to Page 126. I think
20 that that's the document, 16 -- 141. Yeah. I believe
21 that that's the document there. It's -- it was -- so
22 yeah, it -- it's in that -- that declaration. And it
23 may be in other declarations, but I know it's in that
24 one.

25 Q. This is Exhibit 1029 from the IPR concerning

1 the '926 patent.

2 So where are your opinions regarding the 1415
3 document?

4 A. Yes. If you scroll down to Page 126, and then
5 you'll see there's a -- under the Mac submissions, it's
6 there roughly, you know, in the middle of the page,
7 11-16/1415.

8 Q. Okay.

9 A. So yeah.

10 Q. Yeah. So then what's the evidence concerning
11 when it was or when it was -- I'm sorry -- when it was
12 made available?

13 A. So if you scroll up, this is -- this is -- I
14 believe this is a reference from IEEE Web page on the
15 802.11ax meeting from November 2016. And then that
16 would have list -- and it's listing a technical
17 presentation that was made. So it would have been
18 presented at the meeting and would be uploaded on the
19 file server by that date presentation was made.

20 Q. And what file server would that be?

21 A. Yes. It's -- it's the IEEE 802.11 -- it's the
22 mentor website -- mentor server.

23 Q. So returning to the document, is your opinion
24 that this was made available to the public in
25 November 2016? And by "the document," I'm referring to

1 the 1415 reference.

2 A. Yes. I -- I believe that was available by
3 November 2016 or -- or earlier, yeah.

4 Q. And was that before the D1.0 draft was issued?

5 A. Yes. I believe it was.

6 Q. So in -- withdrawn.

7 The 1415 document, you rely in your opinions on
8 the section starting on Page 6 BSS Color Change
9 Announcement element. Do you recall that?

10 A. Yes. I do rely on that section.

11 Q. And then in the D1.0 reference, Exhibit 1005 --
12 bear with me. All right. So in exhibit -- I'm sorry.

13 In the D1.0 reference, you also rely upon a
14 section entitled "BSS Color Change Announcement," which
15 is on -- which is Section 9.4.2.22 of D1.0.

16 Would you agree?

17 A. Yeah. Can you -- can you repeat the question.

18 Q. So for your combinations involving the D1.0
19 reference, you also rely upon a section from that
20 reference entitled "BSS Color Change Announcement
21 element."

22 Would you agree?

23 A. Yes. I'm looking at Paragraph 139 in my
24 declaration. Yes, I agree.

25 Q. So are you aware of any substantive difference

1 between the BSS Color Change Announcement element
2 section in D1.0 and BSS Color Change Announcement
3 element section in the 1415 reference that would be --
4 make any difference to your obviousness opinions that
5 rely on that -- those sections?

6 MR. STEPHENS: Objection. Form.

7 THE WITNESS: Yeah. I -- I'm not aware of any.
8 It's possible that there's some minor differences, but
9 I'm not aware of any.

10 BY MR. RUBIN:

11 Q. So in your opinions concerning the 1415
12 reference, you also point to a section on Page 7,
13 25.1a.1, "Selecting and Advertising new BSS Color."

14 Do you see that?

15 A. Yes, I see that there.

16 Q. And then turning to D1.0, in your opinions
17 concerning this reference, you also rely upon a section
18 titled "Selecting and Advertising a New BSS Color,"
19 which appears in that document at Section 27.16.2.

20 Do you see that?

21 A. Yes, I see that there.

22 Q. And if you compare the selecting and
23 advertising a new BSS color section in D1.0 and the
24 selecting and advertising a new BSS color section in
25 1415, although the section numbering is different, would

1 you agree that the -- the text of those sections is
2 very, very similar?

3 A. I -- I haven't specifically analyzed, you know,
4 yeah, how similar the text is.

5 Q. Are you aware of any difference between the
6 text of the section Selecting and Advertising New BSS
7 Color from D1.0 that you rely for Grounds 1A and 1B and
8 the text of section Selecting and Advertising New BSS
9 Color for 1415 that you rely upon for Grounds 2A and 2B
10 that is in any way material to the obviousness opinions
11 that you render for those grounds?

12 A. Yeah. Once again, it -- it's possible that
13 there are differences, but I'm not aware -- I'm not
14 aware of the differences in terms of their, you know,
15 contribution to this, you know, obviousness argument.

16 Q. I'd like to ask about the relationship between
17 Grounds 1A and 1B. So Ground 1A is obviousness based on
18 the D1.0 reference by itself.

19 Would you agree?

20 A. Yes. Ground A is a -- is that Draft 1.0
21 related to 802.11ax alone renders Claims 1 through 4
22 obvious.

23 Q. And -- and then Ground 1B is a -- relies on a
24 combination of D1.0 Yang with an earlier version of
25 802.11, that is, 802.11-2016; is that right?

1 A. Ground 1B includes Yang and 802.11-2016. I'm
2 not sure what you mean by an earlier version, but it is
3 802.11 -- the standard IEEE 802.11-2016.

4 Q. Okay. And so in Ground 1B, would you agree
5 that you rely on -- on the D1.0 reference to satisfy a
6 number of the claim elements?

7 MR. STEPHENS: Objection. Form.

8 THE WITNESS: Well, I would say that it's
9 really the combination of the -- of the three references
10 that render the claim elements obvious.

11 BY MR. RUBIN:

12 Q. If I look through your analysis of Claim 1 for
13 Ground 1B -- here I'm talking about the
14 element-by-element analysis, which starts at
15 Paragraph 177 -- I see the Yang reference relied upon as
16 teaching the transceiver limitation 1.1 and the
17 processor limitation 1.2, but I don't see any citations
18 to the Yang reference for any of limitations 1.3 or 1.9
19 or through claims -- or for Claims 2 or 3.

20 Would you agree that there's no portion of Yang
21 that you cite in your analysis for obviousness for any
22 of limitations 1.3 through 1.9 or Claims 2 and 3?

23 MR. STEPHENS: Objection. Form.

24 THE WITNESS: Yeah. Can you repeat the
25 question, please.

1 BY MR. RUBIN:

2 Q. Would you agree there is no portion of the Yang
3 reference that you cite in your analysis for obviousness
4 for any of limitations 1.3 through 1.9 or Claims 2 and
5 3?

6 MR. STEPHENS: Objection. Form.

7 THE WITNESS: For the Draft 1.0 Yang in
8 802.11-2016 combination, I -- I -- I don't see a
9 specific reference in my declaration, you know, related
10 to those claim elements.

11 BY MR. RUBIN:

12 Q. And then for Limitations 1.5, 1.6, and 1.7 and
13 1.8, which you address for Ground 1B at Paragraphs 194
14 through 196, you'd agree that your only analysis
15 provided is to point back to your analysis for those
16 limitations in Ground 1A, which was based just on the
17 D1.0 reference?

18 MR. STEPHENS: Objection. Form.

19 THE WITNESS: Yeah. I see that I -- my
20 declaration I reference back to Ground 1A for --
21 Paragraph 194, Paragraph 195 for certain claim elements.

22 BY MR. RUBIN:

23 Q. So if we were to assume hypothetically that the
24 board were to find that the D1.0 reference failed to
25 render obvious one or more of the Limitations 1.5 or

1 1.8, you haven't offered any opinions that are based on
2 any references in addition to D1.8 -- 1.0, rather, that
3 would render those limitations obvious under Ground 1B;
4 correct?

5 MR. STEPHENS: Objection. Form. Scope. Calls
6 for a legal conclusion and speculation.

7 THE WITNESS: Yeah. I -- I really don't -- I
8 don't really -- I don't understand the question.

9 BY MR. RUBIN:

10 Q. So you've -- you've offered the opinion that
11 D1.0 was posted to the IEEE 802.11 member area on
12 December 1st, 2016; is that right? I guess, for
13 example, this -- that date appears in Paragraph 52 of
14 Exhibit 1 -- or 1015.

15 A. Yes. It shows in Paragraph 52 of the
16 Exhibit 1015 the Draft 1.0 was made available on
17 December 1st, 2016.

18 Q. But a person who did not have required username
19 and password could not have downloaded D1.0 at that
20 time; right?

21 MR. STEPHENS: Objection to form.

22 THE WITNESS: On -- on December 1st a person
23 with a password to the members' area would be able to
24 download it, and other people would have been able to
25 access the document in other ways.

1 BY MR. RUBIN:

2 Q. And -- but you haven't offered any opinion that
3 D1.0 was made available on a public website where a
4 member of the public could download it without providing
5 a password; correct?

6 A. I'm looking at Exhibit 1031, Paragraph 6, and
7 the Draft 1.0 was available to members of other working
8 groups. So didn't have to be 802.11 working group. And
9 it's also made available to nonvoting members of 802 as
10 well.

11 Q. So your answer was that it's available to
12 members of other working groups and it's made available
13 to nonvoting members of 802 as well.

14 Did you -- was there anyone else that you said
15 it was made available to?

16 A. Looking at Paragraph 8 of Exhibit 1031, I state
17 here that this -- it's made available to aspirant IEEE
18 members, IEEE leadership informed interested parties,
19 was intended to be shared outside the working group.
20 I -- I'm certain that -- that Draft 1.0 was downloaded
21 and shared with other members of the public.

22 Q. All right. So you're referring to 1031, so --
23 which is the supplemental availability declaration you
24 submitted in the 01165 IPR. We established earlier that
25 that's at least very similar to, if not verbatim, the

1 same as Exhibit 1018 in the 01164 IPR. I think I'd
2 refer to -- refer to Exhibit 1018 in the 01164 IPR for
3 the purposes of the record. So I've got Exhibit 1018,
4 your supplemental declaration concerning the '262 patent
5 IPR on the screen.

6 And so you can see Paragraph 8 you're referring
7 to on the screen now?

8 A. Yes.

9 Q. Okay. So you would agree that in your second
10 declaration in the '262 IPR, Exhibit 1015, you offered
11 some opinions about how a member of the IEEE 802.11ax
12 working group who had a username and password could have
13 downloaded D1.0 from a link that was provided to them by
14 an -- by an email.

15 Do you recall that?

16 A. Yes. I'm looking at Paragraph 52 of
17 Exhibit 1015. It says Draft 1.0 was initially made
18 available to voting members -- working group.

19 Q. And then I take it that in Exhibit 1018 in
20 Paragraph 8, you're offering some additional ways that
21 you believe persons skilled in the art could have had
22 access to D1.0 even if they weren't working group
23 members with the username and password; is that right?

24 A. That's right. So it's not necessary to be in
25 a -- a voting member or working group member to -- to --

1 to access Draft 1.0, and I explain some of that in
2 Paragraph 8.

3 Q. Now, in your declarations in this IPR -- or in
4 these IPRs, you've referred to the IEEE mentor website.

5 You're not offering opinion that D1.0 was ever
6 made available on the IEEE mentor website, are you?

7 MR. STEPHENS: Objection. Form.

8 THE WITNESS: Yeah. I'm not certain if the --
9 the website where, you know, voting members can download
10 the draft, if that's part of the mentor website or not.
11 Yeah. I really don't know.

12 BY MR. RUBIN:

13 Q. Okay. And then you also mention an IEEE
14 website called "IEEE Xplore" where members of the public
15 can purchase IEEE documents.

16 You're not offering the opinion, though, that
17 D1.0 was ever available for purchase on IEEE Xplore;
18 correct?

19 MR. STEPHENS: Objection. Form.

20 THE WITNESS: Yeah. I -- I don't know if 1.0
21 was ever available on IEEE Xplore or not.

22 MR. STEPHENS: Dr. Hansen, how are you doing?
23 I know we've been going for about an hour and 20 minutes
24 since our last break.

25 THE WITNESS: Yeah. I was going to ask if we

1 can take a break for lunch soon.

2 MR. RUBIN: Sure. Yeah. All right. Let's go
3 off the record.

4 THE VIDEOGRAPHER: Off the record at 11:47 a.m.

5 (A lunch recess is taken.)

6 THE VIDEOGRAPHER: Back on the record at
7 12:37 p.m.

8 BY MR. RUBIN:

9 Q. So if I could ask you to turn to Exhibit 118,
10 the supplemental declaration from the '262 patent IPR,
11 and specifically to Paragraph 16.

12 A. Yes. Uh-huh. Paragraph 16.

13 Q. All right. And so here you say that you offer
14 opinions about a private members only documents area
15 that 802.11 participants were given access to.

16 See that?

17 A. Yeah. I refer to it as the private area of the
18 802.11 website. Yes. That's -- that's it. Uh-huh.

19 Q. And I take it that you've been to that private
20 members area?

21 A. Yes. I've been to the private area of the
22 802.11 website.

23 Q. All right. So I will share in the chat
24 function what I'll designate as Exhibit 217 -- or 2017,
25 I should say.

1 DEPOSITION OFFICER: And this one you want
2 attached?

3 MR. RUBIN: Yes, please.

4 (Whereupon the document referred to is marked
5 by the reporter as Plaintiff Exhibit 2017 for
6 identification.)

7 BY MR. RUBIN:

8 Q. And I'll represent to you that this is a
9 screenshot that was taken from an expert report that was
10 prepared by Paul Nikolich in the district court
11 litigation where he took a screenshot from the URL
12 that's listed on the screen.

13 Do you recognize this as what a member would
14 see when they access the private members area -- or that
15 private members only document server --

16 MR. STEPHENS: I'll object. Yeah. Just one
17 moment. Just object to the line of questioning on this
18 document as it was not referenced in Dr. Hansen's
19 declaration. And the objection -- I'm sorry -- is to
20 scope.

21 THE WITNESS: Yeah. I haven't seen this
22 before. I -- I don't -- I don't know, you know, when or
23 how this was taken -- this was taken.

24 BY MR. RUBIN:

25 Q. Well, I understand I -- that you don't have

1 personal knowledge of the province of this specific PDF
2 in front of you beyond what I've told you.

3 But in your declarations, for example, in
4 Exhibit 1018, you offer opinions about members being
5 given credentials for accessing private area of the IEEE
6 website; correct?

7 A. As I -- as I stated in Exhibit 1018,
8 Paragraph 16, as mentioned that 802.11 operations manual
9 credentials for accessing private area were provided to
10 all new activated participants. That's all --

11 Q. And -- all right.

12 And earlier today you testified that you voted
13 on drafts of the 802.11ax standard; correct?

14 A. Yes. I did vote on drafts of the 802.11ax
15 amendment, yes.

16 Q. And -- fair enough.

17 And I take it that before you voted on drafts
18 of the amendment, you downloaded drafts of the amendment
19 from the IEEE private area so that you could review what
20 you're being asked to vote on?

21 Is that right? Did you do that?

22 A. I definitely reviewed Draft 1.0 before voting
23 on it. I'm not certain -- you know, this was more than
24 ten years ago. I'm not certain if I downloaded it from
25 the private members area here or if I obtained a copy

1 another way.

2 Q. Okay. Setting aside this specific document,
3 D1.0, do you recall going to the IEEE members area to
4 download any drafts of IEEE standards or amendments
5 thereto?

6 A. Yes. I -- I have downloaded drafts from the
7 IEEE 802.11 members area.

8 Q. And do you recall whether the members area that
9 you downloaded drafts from looked like the screenshot in
10 Exhibit 2017?

11 A. Yeah. I don't recall. I mean, I don't know
12 what -- what date this screenshot was taken. I'm not
13 sure how to compare.

14 Q. So if you look at the screenshot under the
15 heading "Members Area," it says, "Documents whose
16 circulation is restricted to members of 802.11, and by
17 reciprocal agreement, members of either IEEE 802 working
18 groups."

19 Do you see that?

20 A. Yes, I see those words there.

21 Q. All right. And so if Wilus's expert in IPRs
22 were to offer opinion that there was language to that
23 effect when D1.0 was made available, you wouldn't have
24 any memory of anything to the contrary?

25 MR. STEPHENS: Objection. Form. Scope.

1 Relevance. Speculation.

2 THE WITNESS: Yeah. I really don't know what
3 evidence you're talking about. Or I can't answer the
4 question.

5 BY MR. RUBIN:

6 Q. All right. So you -- you -- you're not going
7 to say, for example, that based on your memory or your
8 experience, the IEEE 802.11 members area didn't contain
9 language informing members that the circulation of these
10 drafts was restricted to members of 802.11 and members
11 of other 802 working groups?

12 MR. STEPHENS: Objection. Form. Scope. Calls
13 for speculation.

14 THE WITNESS: Yeah. I -- I don't -- I don't
15 recall making any testimony about this previously, and
16 I'm not aware of -- it's not something checked. I
17 don't -- I really don't know what the website says.

18 BY MR. RUBIN:

19 Q. So in your supplemental declaration -- we
20 looked at Paragraph 8 before, and under 8a you say that
21 aspirant IEEE members were informed of and given
22 immediate access to D1.0 upon its release.

23 Suppose an aspirant member in 2016 or 2017
24 wanted a copy of D1.0. In your opinion, how would they
25 have received access to that document? I don't -- I

1 don't see you offering the opinion they would have
2 received a password -- a username and password. So how
3 is it that they would have actually, in practice, gotten
4 access to the document?

5 A. As I have -- as I state here in Paragraph 8b,
6 members of the general public could become aspirant
7 members and were given access to the document server
8 that stored draft standard documents like D1.0
9 immediately upon --

10 DEPOSITION OFFICER: Can you -- can you read --
11 hold on. Can you read slower.

12 THE WITNESS: Sorry. Sorry. Yes.

13 As I state in Paragraph 8b, members of the
14 general public could become aspirant members by
15 attending only one session and were given access to the
16 document server that stored draft documents like
17 Draft 1.0 immediately upon attending a session.

18 BY MR. RUBIN:

19 Q. So what's the evidence that you base that
20 opinion on that they were given access to the document
21 server -- that is, that aspirant members were given
22 access to the document server?

23 A. Scrolling down to Paragraph 11; and there is a
24 figure there, 802.11 operations manual; and it states,
25 "Credentials will be emailed to new active 802.11

1 participants after the session in which they become an
2 active 802.11 participant."

3 Q. So I don't see any reference there to aspirant
4 members that -- how do you know if this applies to
5 aspirant members?

6 A. On Paragraph 14 of Exhibit 1018 states that
7 802.11 operation manual defines an active 802.11
8 participant as a participant with status aspirant,
9 potential voter, or voter. So an aspirant is an
10 activated 802.11 participant.

11 Q. You cite to the 802.11 operations manual.

12 Are you familiar with the IEEE SA Standards
13 Board operations manual?

14 A. I'm aware there's a IEEE 802.11 SA Standards
15 Board operations manual, but I -- I don't believe I
16 referenced it in any of the -- any of the exhibits.

17 Q. You were vice chair of 802.11ad at one point;
18 is that right?

19 A. Yes. I was vice chair of 802.11 -- of the IEEE
20 802.11ad task group.

21 Q. And did 802.11ad distribute drafts via
22 password-protected private members -- private members
23 area?

24 A. I don't recall specifically, but I believe that
25 the 802.11ad drafts would have appears on the -- the

1 members area part of the 802.11 website.

2 Q. So in Paragraph 56 of your exhibit --
3 withdrawn.

4 Paragraph 56 of your second declaration in the
5 '262 IPR, Exhibit 1015 -- just pull that up on screen.

6 So you say in the sentence beginning at the
7 bottom of Page 31 that, quote, voting members commonly
8 shared strap -- shared draft standards amendments like
9 Draft D1.0 with nonvoting members in industry and
10 academia or other interested members of the public upon
11 their release in the members area of the IEEE websites.

12 A. Yes, I see that there.

13 Q. Did you ever personally share any drafts from
14 802.11ax with nonvoting members or other interested
15 members of the public?

16 A. Yes. I believe I did.

17 Q. You don't offer opinions about that in your
18 declarations, do you?

19 A. I'm looking at Exhibit 1018, Paragraph 28.

20 Q. Which paragraph?

21 A. Paragraph 28, Page 18 of Exhibit 1018.

22 Q. Okay.

23 A. And there I -- there's a screenshot of an email
24 I sent to students at UCLA with a link to Draft 6.0 of
25 802.11ax.

1 Q. Now, you don't provide any evidence in your --
2 in any of your declarations that any aspirant member, in
3 fact, ever received a copy of Draft D1.0; correct?

4 A. My understanding is I provide evidence that
5 aspirants had access to the 802.11 D1.0. I'm not aware
6 of a specific aspirant; but there were hundreds of
7 aspirants, you know, during the time Draft 1.0 was
8 available. So there -- there were many aspirants who
9 would have had access to Draft 1.0.

10 Q. Then you offer some opinions about IETF working
11 group chairs potentially providing copies of IEEE drafts
12 through the IETF.

13 You don't offer any evidence that an IETF
14 working group chair ever actually distributed the 1.0 to
15 anyone through the IETF, do you?

16 MR. STEPHENS: Objection. Form.

17 THE WITNESS: Well, as I state in Paragraph 25
18 of Exhibit 1018, an IETF working group chair is provided
19 access to the username, password for the 802.11 working
20 group archives and is permitted to share that
21 information with participants in the IETF working group.
22 I -- my -- my understanding is IT -- IT -- IETF working
23 group is huge. It may be over a thousand participants.
24 So I -- you know, there's -- it's likely this is shared
25 with, you know, lots of people. I -- I -- but yeah.

1 That's -- that's the evidence I have in my declaration.

2 BY MR. RUBIN:

3 Q. Do you have an understanding of why the private
4 members area on the IEEE website was password protected?

5 A. No. I'm not -- I'm not sure why the IEEE has
6 chosen to do that.

7 Q. Do you have any understanding of why IEEE
8 working groups, such as the ones you participated in and
9 one you were vice chair of, distributed drafts through
10 password-protected private members area rather than on a
11 public website?

12 A. As I recall, you know, this -- this is a topic
13 that was rarely discussed at 802.11 working group
14 meetings. I don't -- I don't recall -- I really only
15 vaguely recall it being discussed once many years ago,
16 more in the context of the IEEE wanting to sell drafts
17 on -- for money on their websites. So I -- I -- I
18 don't -- I -- I'm not aware of a specific reasoning of
19 why the password -- the -- the members area website
20 is -- is used.

21 Q. So in Exhibit 115, Paragraph 66, you state in
22 the sentence starting at the bottom of Page 36, quote, I
23 estimate that Draft D1.0 would have been disseminated to
24 thousands of additional interested members of the public
25 apart from just voting members by the earliest claimed

1 priority date of the '262 patent.

2 Now, I -- I believe you testified that you
3 haven't actually identified any specific interested
4 member in the public who is not a voting member who
5 received a -- a copy of Draft D1.0 before the claimed
6 priority date of the '262 patent; correct?

7 A. I -- I testified earlier that I -- I know
8 specifically of people that have received Draft 6.0
9 because I personally emailed it to them. With regard to
10 Draft 1.0, I don't think I make any statement regard to
11 someone I know personally who's been -- has received a
12 copy of the draft.

13 Q. All right. So you don't have any evidence of
14 even one specific person who received it, but you
15 estimate that there were thousands that received it?

16 A. The -- the estimate I make being thousands
17 is -- I understand from working in industry and working
18 in standards and how -- how standards developments work
19 is that engineers who participate in standards share the
20 drafts with the coworkers at their companies who
21 don't -- you know, who don't have time to attend
22 meetings so that those coworkers understand what's --
23 what's in the draft and can design products. That's --
24 that's a well-known practice in -- in the industry.

25 So that -- that alone would -- and given that

1 there are -- probably when 802.11ax Draft 4.0 came out,
2 there were more than 300 participants in the meeting,
3 it -- really all it would take is that each of those
4 participants brought back a copy and shared it with
5 three coworkers, which I think is very likely.

6 Q. Now, you just gave a number of more than 300
7 participants in the answer you gave. In Paragraph 66
8 you provide an estimate of roughly 600 IEEE 802 working
9 group members.

10 So why the difference between 600 and 300?

11 A. I just -- I just misspoke. Yeah. It's even
12 larger. So there were -- right. So I -- I have -- as I
13 provide here in Paragraph 66, there were roughly 600
14 IEEE 802 working group members with direct access to the
15 documents. So that -- that's the number I have.

16 Q. According to Paragraph 55, you state there are
17 300 other working group members and 300 additional
18 members of other 802 working groups; is that right?

19 Is that right?

20 A. Yeah. So Paragraph 55 clarifies 300 802.11
21 working group members and at least 300 additional 802
22 working group member -- parts of the other -- other
23 working groups within IEEE 802 would have had access to
24 the documents.

25 Q. Earlier I asked you some questions about a

1 declaration prepared by Dr. Harry Bims.

2 Do you know Dr. Bims?

3 A. Yes. I've met Dr. Harry Bims.

4 Q. Do you recall when the last time is that the
5 two of you spoke?

6 A. Yes. I think I talked to Harry Bims at an RPI
7 alumni event in early March. We went to the same
8 college as undergrads.

9 Q. I just uploaded what I'll designate as
10 Exhibit 2018. It is a declaration submitted in district
11 court by Dr. Harry Bims dated December 22nd, 2026.

12 I'll ask if you've ever seen this.

13 (Whereupon the document referred to is marked
14 by the reporter as Plaintiff Exhibit 2018 for
15 identification.)

16 A. I don't believe I've seen this document before.

17 Q. So on the screen you can see the table of
18 contents of Dr. Bims's declaration. I'd like you to
19 compare it to the table of contents of your declaration,
20 Exhibit 1015. And looks like every section and
21 subsection title that appears in your declaration also
22 has a corresponding section or subsection title in
23 Dr. Bims's declaration, although he adds a couple of
24 sections.

25 Would you agree?

1 MR. STEPHENS: Objection to the scope.

2 Dr. Hansen has testified that he's not seen this
3 document. It's not part of his declaration, not a
4 document he's addressed. And also object to the
5 relevance of these questions. I'm not sure what
6 Dr. Bims' declaration has to do with any issues that are
7 at issue in the IPRs that are the subject of this
8 deposition.

9 THE WITNESS: As I stated previously, I haven't
10 seen this document before. I mean, it's possible there
11 are similarities between the table of contents in this
12 document and the table of contents in one of my
13 declarations.

14 BY MR. RUBIN:

15 Q. So I think you -- you had testified a minute
16 ago that the last time you saw Dr. Bims was at an alumni
17 event last month.

18 A. That's right.

19 Q. At any time in the last two years, have you
20 discussed issues relating to public accessibility of
21 prior art documents that -- at issue in the cases
22 between Samsung and Wilus with Dr. Bims?

23 A. No. I've never discussed any of my work with
24 Dr. Bims.

25 Q. So turning now to the D1.0 document itself and

1 specifically to Page 168 of the PDF, starting around
2 Line 14 or 15 on the page, there's a sentence that
3 reads, quote, If the trigger frame was received in a
4 non-HE PPDU, then set to the value of the BSS color
5 subfield to the most recently received HE operation
6 element for the BSS.

7 Do you see that?

8 A. Yes. I see what you've highlighted there.

9 Q. And there is nothing in that sentence that
10 modifies or qualifies this instruction, makes it
11 conditional on some other thing being true --
12 correct? -- beyond the fact that a trigger frame is
13 received in a non-HE PPDU?

14 A. Well, I mean, there are -- there are a number
15 of things here. I mean, it would -- this one sentence
16 is -- you know, is buried deep within, you know,
17 standard amendment draft. So there -- there are
18 naturally going to be a number of different, you know,
19 conditions upon which this would apply. I'm not really
20 sure what you're asking.

21 Q. Well, where this instruction I just read does
22 apply, the source for setting the BSS color parameter is
23 HE operation element; correct?

24 DEPOSITION OFFICER: Operational what?

25 MR. RUBIN: HE operational element. Sorry. HE

1 operation element.

2 THE WITNESS: This particular sentence refers
3 to an HE operation element.

4 BY MR. RUBIN:

5 Q. And it doesn't refer to a active BSS color,
6 does it?

7 MR. STEPHENS: Objection. Form.

8 THE WITNESS: This particular sentence refers
9 to -- it uses the word "HE operation element." It
10 doesn't use -- doesn't use the label "active" here.

11 BY MR. RUBIN:

12 Q. In fact, the phrase "active BSS color" doesn't
13 appear anywhere in D1.0, does it?

14 A. I -- I'm not certain if -- if that particular
15 phrase appears in Draft 1.0 or not.

16 Q. And do you know whether the phrase "active BSS
17 color" appears on a finally adopted 802.11ax amendment?

18 MR. STEPHENS: Objection. Scope.

19 BY MR. RUBIN:

20 Q. Still thinking about the answer?

21 A. Yeah. I -- I -- I was just reviewing my
22 declaration to see if I reference -- I don't believe I
23 have -- reference the 802.11ax. So I'm not -- I'm not
24 certain if -- if those exact words are used in the final
25 802.11ax amendment.

1 Q. Turning to 0250 reference section, on Page 17
2 of that reference, Section 27.5.2.3 has that same
3 sentence that I read from D1.0, quote, The trigger frame
4 was received in a non-HE PPDU, then set the value -- set
5 to the value of the BSS color subfield of the most
6 recently received HE operation element for that BSS.

7 You see that?

8 A. Yes, I see that there.

9 Q. And so in both D1.0 and 0250, it says that the
10 BSS color parameter shall be set as follows and says
11 that if the trigger frame was received in a non-HE PPDU,
12 then the BSS color parameter shall be set to the value
13 of the BSS color subfield as the most recently received
14 HE operation element of that BSS.

15 You'd agree?

16 A. The -- the text you highlighted states that,
17 but I believe there are -- there are other references to
18 BSS color, you know, throughout Draft 1.0 setting the
19 BSS color -- Draft 1.0, so that's not the only -- that's
20 not the only place where setting the BSS color is
21 described.

22 Q. Okay. Well, let's turn to your declaration,
23 Exhibit 1003, where you address, for Ground 1, point --
24 I'm sorry -- for Ground 1A, Limitations 1.5 and 1.7.

25 Do you cite to anything from --

1 A. I don't understand the question.

2 Q. Well, it wasn't finished. Withdrawn.

3 All right. So I just uploaded what's already
4 in the record as Exhibit 2012, which is Draft D2.3 to
5 802.11ax dated April 2018.

6 You see that?

7 A. Yeah. Let me download the document.

8 Okay. Yes. I have the document here.

9 Q. And have you reviewed this document as part of
10 your work on this case?

11 MR. STEPHENS: I'll object to the scope of the
12 line of questioning as to this document, which was not
13 cited in his declarations.

14 THE WITNESS: Yeah. I'm not certain -- I'm not
15 certain if I've reviewed -- you know, I -- I may have
16 reviewed this document at some point, but I -- I don't
17 recall reviewing it specifically.

18 BY MR. RUBIN:

19 Q. So if we chain -- if we turn to Page 280 of the
20 document, which is part of Section 27.5.3.3 -- all
21 right. So we turn to Page 280 of this document, D2.3,
22 which is under Section 27.3 -- 5.3.3, starting at around
23 Line 30, the text says, quote, The BSS color parameters
24 set as follows. And then the second bullet under that
25 says, If the trigger frame was received in a non-HE

1 PPDU, then set to the value of the active BSS -- I'm
2 sorry -- the active BSS color, as defined in Section
3 27.11.4.

4 You see that?

5 A. Yes, I see those words there.

6 Q. All right. So in D1.0 the text says that the
7 BSS color parameter shall be set to the value of the BSS
8 color subfield in the most recently received HE
9 operation element, but then in D2.3 it says the BSS
10 color parameter is set to the value of the active BSS
11 color.

12 You see that?

13 A. Yeah. I see the text you're pointing to.

14 Q. So in D2.3 there's a change in how BSS color
15 parameter was to be set, trigger frame was received in a
16 non-HE PPDU, relative to how it was to be set in Draft
17 D1.0; correct?

18 MR. STEPHENS: Form. Scope. Relevance.

19 Again, this is not a document that was cited in
20 Dr. Hansen's declaration.

21 THE WITNESS: Yeah. I haven't -- I haven't
22 reviewed this carefully. I -- have an opinion one way
23 or the other.

24 BY MR. RUBIN:

25 Q. And in the portion of D2.3 that I read from,

1 you see that text is followed by a parenthesis and a
2 number sign and then the number 1173?

3 You see that?

4 A. Yes, I see.

5 Q. What's the significance of that number?

6 MR. STEPHENS: Objection. Form. Scope.
7 Relevance.

8 THE WITNESS: In this particular case, I'm not
9 certain.

10 BY MR. RUBIN:

11 Q. So do you know whether that number indicates a
12 CID number that --

13 A. It could represent -- it could represent an --
14 an indication that's tied to a -- to a CID number.

15 Q. I take it that you're not familiar with CID
16 11730?

17 A. I'm -- I'm not -- sitting here today, I -- I
18 can't recall exactly what the common ID number -- it is
19 a common ID number -- what it would be -- what it would
20 mean.

21 Q. I'll upload what's in the record as
22 Exhibit 2011. This is Exhibit 2011 of the 01164 IPR.
23 It's a document with an identifier IEEE
24 802.11-18/0367r1.

25 You see that?

1 A. Yes, I see it.

2 Q. I know there are a lot of these documents, but
3 I have to ask if you're familiar with this specific one.

4 MR. STEPHENS: Objection to scope. Again,
5 document that was -- I don't believe was cited in
6 Dr. Hansen's declarations.

7 THE WITNESS: Yeah. It's possible I've seen
8 this document previously, but I -- I don't recall
9 specifically.

10 BY MR. RUBIN:

11 Q. So on the second page we see a table that lists
12 CID numbers, comments, proposed changes, and
13 resolutions.

14 You see that?

15 A. I see the table there.

16 Q. And for the row with the number 11730,
17 resolution says, Revised. Agree with the comment.
18 Revised text to indicate that the responding station
19 shall use the active color as defined in 27.11.4.

20 You see that?

21 A. Yes, I see that.

22 Q. Yeah. So when it says "agree with the
23 comment," who is it that agreed with the comment?

24 MR. STEPHENS: Objection. Form. Scope.
25 Relevance.

1 THE WITNESS: Yeah. I'm not -- I'm not sure.

2 BY MR. RUBIN:

3 Q. You've seen IEEE documents like this as part of
4 your participation in the 802.11ax and other standards
5 task groups?

6 MR. STEPHENS: Objection. Form. Scope.
7 Relevance.

8 THE WITNESS: You know, I -- I've seen tables
9 like this. It appears to be a table that would be a
10 part of a larger comment resolution spreadsheet. This
11 is -- looks like a section that's been cut out of that.
12 Other than that, I'm -- you know, I -- I -- I haven't --
13 I haven't reviewed this document as part of the -- my
14 declaration. I really don't have a great deal of
15 familiarity with this particular document, so I can't
16 really say any more than that.

17 BY MR. RUBIN:

18 Q. So turn to the abstract of this document. It
19 says, "This submission proposes resolutions for the
20 following CID received for TGax LB230."

21 And so would you agree that what working group
22 members were being asked to do on -- they voted in favor
23 of this motion was to approve the resolutions listed in
24 the right-hand column of this table?

25 MR. STEPHENS: Objection. Form. Scope.

1 Relevance. I believe Dr. Hansen has testified he
2 doesn't have a great deal of familiarity with this
3 document.

4 THE WITNESS: Yeah. I -- I really -- I really
5 don't know. I don't know -- I don't know if this
6 document was ever presented or these motions were ever
7 actually made. I can't look at this page and -- and
8 know that; right? This is -- this is just a document
9 that is in the form of an IEEE document. So I don't
10 know for certain, you know, that -- other than those
11 words on the page there.

12 BY MR. RUBIN:

13 Q. So do -- you don't know whether this document
14 is describing a motion whereby the working group members
15 were being asked to approve the resolutions shown in the
16 right-hand column?

17 MR. STEPHENS: Objection. Form, scope, and
18 relevance.

19 THE WITNESS: This is a document that appears
20 to be of the type that would be used to resolve
21 comments -- letter about comments for a draft to a
22 letter. Other than that, I -- I don't know the
23 specifics. I haven't reviewed this document in detail.
24 I don't know when this doc -- I don't -- I don't know
25 when this document was presented. I don't know if a

1 motion was ever actually made in the task group on this
2 particular document or -- or not. So I -- I really just
3 don't know.

4 MR. RUBIN: Shall we take a break?

5 THE WITNESS: Sure. Yeah. I could take a
6 break.

7 MR. RUBIN: Let's go off the record.

8 THE VIDEOGRAPHER: Off the record at 2:02 p.m.

9 (A recess is taken.)

10 THE VIDEOGRAPHER: Back on the record at
11 2:18 p.m.

12 MR. RUBIN: Good afternoon, everyone. Bear
13 with me.

14 BY MR. RUBIN:

15 Q. All right. If I could ask you to look at
16 Exhibit 1003, your first declaration, and specifically
17 to the section starting on Page 50 addressing
18 Limitation 1.8.

19 Let me know when you're there.

20 A. Yes, I'm there. Uh-huh.

21 Q. So here you cite to some portions of D1.0 on
22 Page 206 of that reference.

23 You see that?

24 A. Yes, I see that.

25 Q. So turning to Page 206 of that reference, we

1 see Section 27.16.2, Selecting and Advertising New BSS
2 Colors.

3 A. Yes. I -- I -- I'm on that page now, right.

4 Q. And starting on Line 31 at D1.0, it says,
5 quote, An HE AP shall announce its decision to change
6 the BSS color via the BSS color change announcement
7 element which is carried in the Beacon, Probe Response
8 and Reassociation Response frames.

9 Do you see that?

10 A. Yes, I see that.

11 Q. So that's -- that is an instruction that's
12 directed to the access point; correct?

13 A. Yeah. I'm not sure I understand what you mean
14 by an instruction to the access point.

15 Q. Well, it's a directive, a requirement -- how
16 about this. It's a statement that's describing the
17 behavior of the access point; correct?

18 A. Yeah. I -- I'm not sure -- I would say it's
19 more likely -- it's a -- it's a possible -- it's a
20 possible behavior. It would be an allowed -- like, an
21 access point would be allowed to do this.

22 DEPOSITION OFFICER: Is that axis, a-x-i-s, or
23 access, a-c-c-e-s [sic]?

24 MR. RUBIN: The latter.

25 DEPOSITION OFFICER: Thank you. E-s-s, I mean.

1 MR. RUBIN: You got it.

2 Sorry. Give me just a second.

3 BY MR. RUBIN:

4 Q. So turning back to your supplemental
5 declaration, Exhibit 1018, that was filed after the
6 patent owner submitted its preliminary response in this
7 proceeding; is that right?

8 A. Yes. I believe that's correct.

9 Q. And did you review the patent owner's
10 preliminary response before preparing your supplemental
11 declaration?

12 A. Yeah. As I state here, Paragraph 6, I reviewed
13 the preliminary response patent owner submitted, yes.

14 Q. Now, you didn't mention the aspirant pathway --
15 well, withdrawn.

16 In -- in paragraph -- I'm sorry. Withdrawn.

17 In Exhibit 1018, your supplemental declaration,
18 you describe what you refer to as a aspirant pathway for
19 accessing D1.0; is that right?

20 A. Yes. I see that in Paragraph 8, yeah, describe
21 the process for aspirant members.

22 Q. All right. And there's no discussion of
23 aspirant members in your second declaration,
24 Exhibit 1015; correct?

25 A. Yeah. I believe I had some mention of aspirant

1 members in Paragraph 67 but -- but there's more
2 discussion of -- of aspirant members in Exhibit 1018.

3 Q. When did you first learn about the 802.11
4 operations manual provision that grants aspirant members
5 access to the -- or that, according to you, grants
6 aspirant members access to the private area?

7 A. Yeah. I really don't recall.

8 Q. Was it before you submitted your second
9 declaration, Exhibit 1015?

10 A. I -- I've been aware of different versions of
11 the 802.11 operations manual over the past 25 years. So
12 I don't -- yeah. I don't recall -- I mean, this
13 particular version -- you know, I reference one version
14 in Exhibit 1018. I briefly reviewed previous versions,
15 you know, multiple times over the years.

16 Q. Your second declaration, Exhibit 1015, doesn't
17 mention the IETF; is that right?

18 A. Yeah. The only reference to IETF I see in 1015
19 is in one of the example screenshots I have of the
20 802.11 meeting agenda from 2016.

21 Q. Where is that?

22 A. It's on Page 1279. Or sorry. No. I'm sorry.
23 It's Page 1280. It's a screenshot of a working group
24 agenda from January 2016, and it just -- I believe it's
25 just -- yeah. This is a screenshot of the agenda. It's

1 a presentation on -- it's a liaison -- there's liaisons
2 between the IETF and 802.11. And that's just an example
3 of when the liaison presentation was made on the agenda.

4 Q. And when did you become aware of the provisions
5 whereby you contend that people could have obtained
6 access to the D1.0 draft via the IETF working group
7 chair?

8 A. I don't recall specifically. I do recall that
9 the IETF has had a liaison with IEEE 802.11 for as long
10 as I can remember. And there are presentations at every
11 802.11 meeting about, you know, what's going on in the
12 IETF. Sometimes the meetings are co-located so people
13 can attend both 802.11 and IETF, but I don't -- the
14 specifics of the IETF, I don't -- I don't recall exactly
15 when I first became aware of those.

16 Q. Were you aware of those provisions before you
17 submitted your second declaration, Exhibit 1015?

18 A. I'm -- I'm not -- I was aware of the IETF. I'm
19 not sure exactly which iterations of the IETF agreements
20 I was aware of.

21 Q. Were you aware of the -- any of the provisions
22 of -- prior to submitting your second declaration
23 whereby interested persons could obtain copies of IEEE
24 drafts via the IETF working group chair?

25 A. Yeah. I'm -- I'm not certain.

1 MR. RUBIN: All right. I'll pass the witness.

2 MR. STEPHENS: Can we take ten minutes?

3 MR. RUBIN: Okay.

4 MR. STEPHENS: Off the record.

5 THE VIDEOGRAPHER: Off the record at 2:40 p.m.

6 (A recess is taken.)

7 THE VIDEOGRAPHER: Back on the record at

8 2:52 p.m.

9 MR. STEPHENS: Petitioner has no questions for
10 the witness.

11 DEPOSITION OFFICER: You're ordering a copy,
12 Mr. Stephens?

13 MR. STEPHENS: We do not need a copy.

14 DEPOSITION OFFICER: Getting a real-time
15 obligates you to get a copy.

16 MR. STEPHENS: I wasn't aware of that. I
17 will -- we'll just do standard delivery.

18 THE VIDEOGRAPHER: Thank you. This concludes
19 today's deposition. The time is 2:52 p.m. The date is
20 April 9th, 2026. And we're off the record.

21 (Deposition session concluded at 2:52 p.m. Pacific Time)

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1 I have read the foregoing and by signing hereafter,
2 approve same.

3

4 Dated _____.

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6 _____
(Signature of Deponent)

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[illegible]

I, THERESA JOANN PHILLIPS-BLACKWELL, hereby
certify:

I am a duly qualified Certified Shorthand Reporter in the State of California, holder of Certificate Number CSR 12700 issued by the Court Reporters Board of California and which is in full force and effect. (Fed. R Civ. P. 28(a)).

I am authorized to administer oaths or affirmations pursuant to California Code of Civil Procedure, Section 2093(b) and prior to being examined, the witness was first duly sworn by me. (Fed. R. Civ. P. 28(a), 30(f)(1)).

I am not a relative or employee or attorney or counsel of any of the parties, nor am I a relative or of such attorney or counsel, nor am I financially interested in this action. (Fed. R. Civ. P. 28).

I am the deposition officer that
stenographically recorded the testimony in the foregoing
deposition and the foregoing transcript is a true record

/ / /

1 of the testimony given by the witness. (Fed. R. Civ. P.
2 30(f)(1)).

3 Before Completion of the deposition, review of
4 the transcript { } was { } was not requested. If
5 requested, any changes made by the deponent (and
6 provided to the reporter) during the period allowed, are
7 appended hereto. (Fed. R. Civ. P. 30(e)).

8

9 Dated: _____, 2026

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Theresa JoAnn Phillips-Blackwell

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