

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

ERICSSON INC. and)
TELEFONAKTIEBOLAGET LM ERICSSON,) CASE IPR2014-01185
))
Petitioner,)
))
VS.)
))
INTELLECTUAL VENTURES II LLC,)
))
Patent Owner.)

ORAL AND TELEPHONIC DEPOSITION OF
ZYGMUNT J. HAAS, Ph.D.
SEPTEMBER 4, 2015

ORAL AND TELEPHONIC DEPOSITION OF ZYGMUNT J. HAAS,
Ph.D., produced as a witness at the instance of the Patent
Owner, taken in the above-styled and -numbered cause on the
4th day of September, 2015, A.D., beginning at 9:19 a.m. to
11:22 a.m., before Kelly Hassell, RPR, CLR, CSR, in and for
the State of Texas, in the offices of Haynes and Boone,
LLP, located at 2505 North Plano Road, Suite 4000,
Richardson, Texas, in accordance with the Federal Rules of
Civil Procedure and the agreement hereinafter set forth.

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A P P E A R A N C E S

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(Via phone.)

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I N D E X

Direct Examination by Ms. Gordon..... Page 4

EXHIBITS

EXHIBIT NO.	DESCRIPTION	PAGE
Exhibit 1001	U.S. Patent Number 7,269,127	4
Exhibit 1035	Mody Provisional	49
Exhibit 1036	"Supplemental Declaration of Zygmunt J. Haas, Ph.D. Under 37 C.F.R. 1.68 on Behalf of Petitioner"	4

1 P R O C E E D I N G S

2 ZYGMUNT J. HAAS, Ph.D.,

3 having been first duly cautioned and sworn to testify the
4 truth, the whole truth and nothing but the truth, testified
5 on his oath as follows:

6 DIRECT EXAMINATION

7 BY MS. GORDON:

8 Q Good morning, Dr. Haas.

9 A Good morning, ma'am.

10 Q I'm going to hand you a few documents that we're
11 going to be referring to today in your deposition. So the
12 first document I'm going to hand you has been marked as
13 Ericsson 1036. I'm going to hand a copy to your attorney.

14 (Exhibit 1036 marked.)

15 Q (BY MS. GORDON) Do you recognize this document?

16 A Yes. This is my supplemental declaration.

17 Q Okay. And I'm going to hand you another
18 document, and this document has been marked Exhibit 1001 to
19 this proceeding. It's U.S. Patent Number 7,269,127.

20 (Exhibit 1001 marked.)

21 Q (BY MS. GORDON) Do you recognize this document?

22 A Yes, I do.

1 Q So we'll be referring to both of these documents
2 throughout the morning.

3 Dr. Haas, did you do anything to prepare for
4 today's deposition?

5 A Yes. So first of all, I reviewed my supplemental
6 declaration. I also reviewed the '127 patent. When I say
7 "reviewed," I mean reviewed again. Of course, I reviewed
8 many times before.

9 I also reviewed some of the prior art which
10 is cited in my supplemental declaration. I reviewed
11 additional documents, some of which I listed in my
12 supplemental declaration. And I also met with counsel.

13 Q Okay. And you mentioned the documents listed in
14 your supplemental declaration. Is that Paragraph 2 you're
15 referring to?

16 A Yes. Those are some of the documents which I
17 reviewed -- re-reviewed for today's deposition.

18 Q In your answer, you referred to some prior art
19 documents. Were those the Number 2, Schmidl, and Number 3,
20 Arslan documents that are listed in Paragraph Number 2?

21 A And Number 4, the Mody Provisional --

22 Q Okay.

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