

1 UNITED STATES PATENT AND TRADEMARK OFFICE

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5 BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS, INC.,  
Petitioner

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v.

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INTELLECTUAL VENTURES II, LLC  
Patent Owner

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U.S. Patent No. 6,968,459  
IPR2016-01404

15

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Wednesday, September 13, 2017

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Deposition of PAUL D. FRANZON, Ph.D.,

19

taken at the Law Offices of Finnegan, Henderson,

20

Farabow, Garrett & Dunner, LLP, 901 New York

21

Avenue, N.W., Washington, DC, beginning at

22

9:06 a.m., before Ryan K. Black, a Registered

23

Professional Reporter, Certified Livenote

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Reporter and Notary Public in and for District

25

of Columbia.

IV 2008

Unified Patents v. IV

IPR2016-01404

1           A P P E A R A N C E S:

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I N D E X

TESTIMONY OF: PAUL D. FRANZON	PAGE
By Mr. Block.....	4

E X H I B I T S

EXHIBIT	DESCRIPTION	PAGE
Exhibit 1001	a photocopy of the '459 patent.....	13
Exhibit 1002	Dr. Franzon's Original Declaration.....	16
Exhibit 1004	the Bensimon reference.....	49
Exhibit 1012	Dr. Franzon's Supplemental Declaration.....	4

1 Whereupon --

2 PAUL D. FRANZON, PH.D.,  
3 called to testify, having been first duly sworn  
4 or affirmed, was examined and testified as  
5 follows:

6 EXAMINATION

7 BY MR. BLOCK:

8 Q. Can you state your full name for the  
9 record, please?

10 A. Paul Damian Franzon.

11 (Previously marked Exhibit No. 1012,  
12 Dr. Franzon's Supplemental Declaration, was  
13 introduced.)

14 BY MR. BLOCK:

15 Q. Okay. I've handed you what's been  
16 marked Exhibit 1012 in this proceeding. Do you  
17 recognize this document?

18 A. Yes.

19 Q. This is the Supplemental Declaration  
20 that you submitted in this proceeding?

21 A. Yes.

22 Q. And you understand that you're here to  
23 testify regarding IPR Proceeding 2016-01404  
24 today?

25 It's the bottom right.

1 A. Yes.

2 Q. And that IPR involves U.S. Patent  
3 Number 6,968,459?

4 A. Yes.

5 Q. If I refer to that patent as the '459  
6 patent, you'll understand what I'm referring to?

7 A. Yes.

8 Q. And you understand that you're here  
9 today to testify under oath?

10 A. Yes.

11 Q. And that means you need to give true  
12 and complete answers to the best of your ability  
13 to my questions?

14 A. Yes.

15 Q. So my job today is to ask you  
16 questions. Your job is to answer my questions  
17 to the best of your ability. If you don't  
18 understand one of my questions, would you  
19 -- will you ask me to -- to rephrase it?

20 A. Yes.

21 Q. And you understand -- you understand  
22 that if you answer my questions, I'm just going  
23 to assume that -- that you understood them,  
24 okay?

25 A. Yes.

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