



Deposition of:
Vijay Madisetti , Ph.D.

April 9, 2019

In the Matter of:
Ericsson Vs. Intellectual Ventures II

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1 UNITED STATES PATENT AND TRADEMARK OFFICE
2
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD
4

5
6 ERICSSON INC. AND
7 TELEFONAKTIEBOLAGET LM ERICSSON,
8 Petitioner
9 v.
10 INTELLECTUAL VENTURES II LLC,
11 Patent Owner

12
13 CASE IPR2018-01380
14 Patent 8,682,357
15

16 DEPOSITION OF
17 VIJAY MADISETTI, PH.D.

18 April 9, 2019
19 9:02 a.m.

20 Veritext Atlanta
21 1075 Peachtree Street, NE
22 Suite 3625
23 Atlanta, Georgia

24
25 Marsi Koehl, CCR-B-2424

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1	CONTENTS		1	PROCEEDINGS	
2	EXAMINATION		2	VIJAY MADISETTI, PH.D.,	
3			3	having been first duly sworn, was examined and	
4		Page	4	testified as follows:	
5	Examination by Mr. Dutton.....	4	5	EXAMINATION	
6			6	BY MR. DUTTON:	
7			7	Q. Good afternoon, Dr. Madiseti.	
8			8	Can you please state your name for the	
9	EXHIBITS		9	record.	
10	Exhibit No.	Description	10	A. It's Vijay Madiseti.	
11		Page	11	Q. And have you been deposed before?	
12			12	A. Yes.	
13		(None marked.)	13	Q. About how many times have you been deposed?	
14			14	A. Quite a few times. I don't recall the	
15			15	specific numbers but quite a few times.	
16			16	Q. Okay. I'll -- you know, just for some quick	
17			17	background on today's logistics, I'll ask you	
18			18	questions and if you do not understand one of my	
19			19	questions, will you please let me know?	
20			20	A. I will.	
21			21	Q. And if you answer one of my questions, is it	
22			22	fair that I can assume that you understood my	
23			23	question?	
24			24	A. Yes.	
25			25	Q. And we can take a break, you know, as you	
Page 3			Page 5		
1	APPEARANCES OF COUNSEL		1	need. I'll plan to take a break like every hour or	
2	On behalf of the Petitioner:		2	so, but let me know if you need to take a break and	
3	JOHN RUSSELL EMERSON		3	we can do that. Is that okay?	
4	ADAM C. FOWLES		4	A. Yes.	
5	Attorneys at Law		5	Q. Is there any reason that you can't testify	
6	HAYNES AND BOONE, LLP		6	truthfully today?	
7	2323 Victory Avenue		7	A. No.	
8	Suite 700		8	Q. Do you understand that you are here to	
9	Dallas, Texas 75219		9	testify about the declaration you submitted in an	
10	(214) 651-5328		10	inter partes review of U.S. Patent No. 8682357?	
11	russ.emerson@haynesboone.com		11	A. Yes.	
12	On behalf of the Patent Owner:		12	Q. And for purposes of this deposition, is it	
13	TYLER J. DUTTON		13	okay if we call that U.S. patent the "357 Patent"?	
14	BYRON L. PICKARD		14	A. Yes.	
15	Attorneys at Law		15	Q. Okay. I'm going to hand you a few documents	
16	STERNE KESSLER GOLDSTEIN & FOX		16	that we'll be referring to today.	
17	1100 New York Avenue, NW		17	So I'm handing you what has been marked as	
18	Washington, D.C. 20005		18	Exhibit 1003 in this proceeding. Do you recognize	
19	(202) 371-2600		19	this document?	
20	tdutton@sternekessler.com		20	A. Yes. This is my declaration.	
21	Also present telephonically:		21	Q. I'd like you to turn to page 96. It's the	
22	James Hietala		22	last page of the declaration.	
23	(Pursuant to OGCA 15-14-37 (a) and (b) a		23	Is that your signature?	
24	written disclosure statement was submitted by the		24	A. Yes.	
25	court reporter and is attached hereto.)		25	Q. Did you review this document in preparation	

Page 6	Page 8
<p>1 for today's deposition? 2 A. I reviewed it. Yes. 3 Q. I'm handing you what has been marked as 4 Exhibit 1001. 5 Do you recognize this document? 6 A. I do. 7 Q. And what is this document? 8 A. This is the 357 Patent. 9 Q. Did you review this for today's deposition? 10 A. Yes. 11 Q. I'm handing you what has been marked as 12 Exhibit 1005. 13 Do you recognize this document? 14 A. I do. 15 Q. What is this document? 16 A. This is Exhibit 1005. It's the CATT 17 reference, C-A-T-T. 18 Q. Did you review this in preparation for 19 today's deposition? 20 A. I did. 21 Q. I'm handing you what has been marked as 22 Exhibit 1006. 23 Do you recognize this document? 24 A. Yes. This is Exhibit 1006, which I call as 25 the LG reference.</p>	<p>1 qualification there? 2 A. No. 3 Q. So you did not review any other documents 4 besides the exhibits that have been presented to you, 5 the petition and the institution decision? 6 A. I don't recall doing so. 7 Q. Did you meet with anyone in preparation for 8 today's deposition? 9 A. Yes. 10 Q. Who did you meet with? 11 A. I met with the counsel. 12 Q. Which counsel did you meet with? 13 A. With Mr. Emerson and Mr. Knowles [sic]. 14 MR. EMERSON: Fowles. 15 THE WITNESS: Knowles. Is it Knowles? 16 MR. EMERSON: Fowles. 17 THE WITNESS: Fowles. Okay. Sorry 18 about that. 19 BY MR. DUTTON: 20 Q. Is there anyone else that you met with? 21 A. No. 22 Q. Did you speak to anyone in preparation for 23 today's deposition? 24 A. I did not. 25 Q. And how long did you meet with counsel?</p>
Page 7	Page 9
<p>1 Q. Did you review this in preparation for 2 today's deposition? 3 A. I did. 4 Q. I'm handing you one more here, Exhibit 1007. 5 Do you recognize this document? 6 A. Yes. Exhibit 1007 is the CATT 2 reference, 7 C-A-T-T 2 reference. 8 Q. And that's because this is the second CATT 9 reference? 10 A. Yes. 11 Q. Have you reviewed this document in 12 preparation for today's deposition? 13 A. I did. 14 Q. Did you review any other documents in 15 preparation for today's deposition? 16 A. I reviewed the petition as well as the 17 institution decision. 18 Q. Any other documents? 19 A. Not specifically. 20 Q. And what did you do to prepare for today's 21 deposition? 22 A. I reviewed my declaration and, as I said, 23 the exhibits and the documents I mentioned. 24 Q. When you said that you did not review any 25 other documents specifically, was there some</p>	<p>1 A. A few hours. 2 Q. Is that yesterday? 3 A. Yes. 4 Q. Did you take any notes? 5 A. No. 6 Q. I'd like you to turn to paragraph three of 7 your declaration. 8 A. So I have a copy in the binder and it may be 9 convenient sometimes to just go through it, but I 10 will use your exhibits for now. 11 So you said page 3? 12 Q. Yes -- or paragraph three. 13 A. Paragraph three. Yes. 14 Q. Paragraph three includes a list of 15 references that you reviewed for your declaration? 16 A. Yes. 17 Q. Did you review any other references that are 18 not listed? 19 A. No. 20 Q. Let's turn to Exhibit 1001, the 357 Patent. 21 What's the 357 Patent about? 22 MR. EMERSON: Object to the form. 23 THE WITNESS: The 357 Patent is U.S. 24 Patent 8682357. It is related to paging in 25 a wireless network.</p>

<p style="text-align: right;">Page 10</p> <p>1 BY MR. DUTTON: 2 Q. And what is paging in a wireless network? 3 MR. EMERSON: Object to the form. 4 THE WITNESS: As the 357 describes it in 5 column one, lines 30 to 32, paging involves 6 waking up the mobile terminal from the sleep 7 state. 8 BY MR. DUTTON: 9 Q. Okay. What is the sleep state? 10 A. The sleep state or the sleep mode is the 11 state in which the mobile terminal stays in to reduce 12 power consumption, for example, column two, lines 13 five through seven. 14 Q. So the mobile terminal isn't always 15 connected to the network and so it periodically wakes 16 up? 17 A. I did not specifically understand the 18 question. 19 Q. What didn't you understand? 20 A. I mean, what was the question? You said 21 "periodically"? 22 Q. So the mobile terminal isn't always 23 connected to the network, so it periodically wakes 24 up? 25 A. So it -- when we talk about network, there</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Node Bs are equipment that reside in the 2 access network domain, the radio access network 3 domain. And they are -- Node Bs and eNode Bs are 4 examples of equipment that assists the UE and the 5 core network. 6 Q. Is Node B a base station? 7 A. A Node B can be called in some cases as a 8 base station in a very general manner. 9 Q. You referenced an eNode B. Is that a 10 particular Node B? 11 A. ENode B is, again, a type of Node B that is 12 called an evolved Node B. 13 Q. Is that used in LTE? 14 A. It can be used in LT. 15 Q. What is in the core network domain? 16 A. The core network domain would include, for 17 example, portions towards the right of Figure 1. 18 They include the access gateway and other types of 19 equipment for processing various types of 20 functionalities that are needed to operate the 21 wireless network. 22 Q. What types of other equipment other than the 23 access gateway is -- 24 A. You have -- for example in column four, in 25 the description of Figure 1, it is stated in lines 53</p>
<p style="text-align: right;">Page 11</p> <p>1 is an access network and then there is a core 2 network. 3 In the case of, for example, 357, in the 4 sleep mode or in the idle mode, the mobile device may 5 be still connected to the core network. However, it 6 may not have a connection to the radio access 7 network, or the RAN. 8 Q. Got it. 9 So if we turn to Figure 1, the figure shows 10 different domains and you mentioned the core network 11 and the RAN. Is this what you were referring to? 12 A. This is an example in the 357 specification 13 of the UE domain, the radio access network, or the 14 RAN domain, and the core network domain. 15 Q. So let's start with the UE domain. 16 "UE" stands for user equipment? 17 A. Yes. 18 Q. And what is user equipment? 19 A. It's a description -- a descriptor for a 20 mobile device that is -- that is part of the wireless 21 network. 22 Q. And the RAN domain includes Node Bs? 23 A. Examples of equipment in the RAN, radio 24 access network domain, includes Node Bs. 25 Q. What are "Node Bs"?</p>	<p style="text-align: right;">Page 13</p> <p>1 to 58, The core network 116 includes in this example 2 an access gateway, aGW, 118, a serving GPRS support 3 node SGSN 120 and a gateway GPRS support node GGSN. 4 Q. You said this is an example. Are there 5 other examples? 6 A. There can be other examples of types of 7 building blocks that are used in the core network. 8 Q. In those other examples, what building 9 blocks are in the core network? 10 A. As I said, it depends on the type of system. 11 You can have other blocks such as MMEs and other 12 types of functional blocks which are more described 13 in standards such as the TS 23.246. 14 Q. What's an "MME"? 15 A. I think it's mobile management entity, but 16 I'm not exactly sure whether that's completely 17 correct. It's mobile management entity, I believe. 18 Q. What role does that node play in the core 19 network? 20 A. Again, if you look at the standard, it 21 provides a variety of functionalities. They include 22 managing resources, managing various types of 23 communications, managing things like various types of 24 features, for example, multicast and other types of 25 features that are offered by the core network,</p>

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