

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

3  
4 ABB, INC., ) Trial No. IPR2013-00062  
5 ) IPR2013-00063  
6 Petitioner, ) IPR2013-00074  
7 ) (joined) IPR2013-00282  
8 vs. ) (joined) IPR2013-00286  
9 )  
10 ROY-G-BIV CORPORATION, ) US Patent No. 6,516,236  
11 )  
12 Patent Owner. )  
13 )

14  
15 DEPOSITION OF DAVID B. STEWART, Ph.D.  
16 1111 Third Avenue, Suite 3400  
17 Seattle, Washington  
18

19 DATE: Tuesday, October 8, 2013

20 REPORTED BY: Donald W. McKay, RMR, CRR, CCR 3237  
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25 PAGES 1 - 108

**ABB v ROY-G-BIV  
TRIAL IPR2013-00062  
TRIAL IPR2013-00282  
ABB - EXHIBIT 1104**

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Veritext National Deposition & Litigation Services

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I N D E X

EXAMINATION BY PAGE

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MR. McLEOD..... 4

E X H I B I T S

NUMBER DESCRIPTION PAGE

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Exhibit 1100 Chimera 3.2 Overview 91

Exhibit 1101 Paper titled The Chimera Methodology:  
Designing Dynamically Reconfigurable  
Real-Time Software using Port-Based  
Objects 94

Exhibit 1102 Paper titled Chimera II: A Real-Time  
UNIX-Compatible Multiprocessor  
Operating System for Sensor-Based  
Control Applications 97

Exhibit 1103 Program Documentation titled Chimera  
3.2, The Real-Time Operating System  
for Reconfigurable Sensor-Based  
Control Systems 99

E X H I B I T S (referenced)

NUMBER PAGE

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Exhibit 1002 35

Exhibit 1004 36

Exhibit 1048 90

Exhibit 2011 26

Exhibit 2012 102

Seattle, Washington; Tuesday, October 8, 2013

9:39 a.m.

DAVID B. STEWART, Ph.D.                      called as a witness in the  
above-entitled cause, being  
first duly sworn, testified  
as follows:

# E X A M I N A T I O N

BY MR. McLEOD:

Q. Good morning, Dr. Stewart. My name is Rick McLeod. I'm an attorney for ABB. You've probably been told that. We're here to take your testimony today in the matter of ABB versus ROY-G-BIV Corporation.

Now, for the purposes of our proceeding today,  
I'd like to use RGB as an abbreviation for ROY-G-BIV.  
Do you generally understand that? Is that okay with  
you?

A. Yes. That's fine.

Q. In this proceeding, you submitted a number of declarations. Is that correct?

A. That's correct.

Q. And your first declaration, you submitted in IPR-00062. Correct?

MR. MEYER: Object to the form.

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1 THE WITNESS: I don't recall the exact order  
2 that a couple of them were submitted. And for the  
3 numbers, I'd rather look at the actual declaration. I  
4 didn't memorize all the numbers on these.

5 BY MR. McLEOD:

6 Q. I'm not trying to trick you on the numbers.

7 A. But still, just to --

8 Q. At the end of this declaration, you submitted a  
9 resume. Do you recall that?

10 A. Yes, I do.

11 Q. Now, at the time that the declaration was  
12 provided, was the information on it accurate?

13 A. I did find one error in it, which was my contact  
14 info. Because by the time I submitted this, I had  
15 relocated to Seattle. I was originally in Maryland. So  
16 this resume added my new position, but I missed the  
17 personal address and information.

18 Q. So, if I understand correctly, you're currently  
19 employed at Physio-Control in the Seattle area?

20 A. That's correct.

21 Q. But your address was out of date?

22 A. Correct.

23 Q. Looking through your resume here, I note a lot  
24 of experience in a variety of fields. I don't see a lot  
25 of robotics work. Is that correct?

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