

1
2 UNITED STATES PATENT AND TRADEMARK OFFICE

3
4 BEFORE THE PATENT TRIAL AND APPEAL BOARD

5
6 ZYNGA INC.

7
8 Petitioner

9
10 v.

11
12 PERSONALIZED MEDIA COMMUNICATIONS LLC

13
14 Patent Owner

15
16 Case No. IPR2013-00162 - U.S. Patent No. 7,908,638

17 Case No. IPR2013-00164 - U.S. Patent No. 7,797,717

18 Case No. IPR2013-00171 - U.S. Patent No. 7,734,251

19
20 ORAL DEPOSITION OF GERALD T. HOLTZMAN

21
22 Sugar Land, Texas

23
24 Wednesday, January 15, 2014

25
26 Reported by:

27 MICHAEL E. MILLER, FAPR, RDR, CRR

28 Notary Public

29 JOB NO. 69039

ZYNGA EX. 1018

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January 15, 2014
8:55 a.m.

Oral deposition of GERALD T. HOLTZMAN,
held at the offices of Personalized Media
Communications LLC, 14090 Southwest Freeway,
Suite 450, Sugar Land, Texas, before Michael E.
Miller, Fellow of the Academy of Professional
Reporters, Registered Diplomate Reporter,
Certified Realtime Reporter and Notary Public in
and for the State of Texas.

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A P P E A R A N C E S :

JONES DAY
BY: LOUIS TOUTON, ESQUIRE
555 South Flower Street
Los Angeles, California 90071
Counsel for Zynga Inc.

GOODWIN PROCTER
BY: STEPHEN SCHREINER, ESQUIRE
901 New York Avenue, N.W.
Washington, D.C. 20001
Counsel for Personalized Media
Communications LLC

ALSO PRESENT:

MARK KING, ESQUIRE
Personalized Media Communications LLC

1 G. HOLTZMAN
2 PROCEEDINGS
3 (January 15, 2014 at 8:55 a.m.)
4 (Holtzman Deposition Exhibit 2020E
5 marked.)

6 GERALD T. HOLTZMAN,
7 having been duly sworn,
8 testified as follows:

9 EXAMINATION

10 BY MR. TOUTON:

11 Q. Let me just put this declaration,
12 Exhibit 2020E, in front of you, but I'm not going
13 to ask about it right at the beginning.

14 So what's your name?

15 A. Gerald Holtzman.

16 Q. What is your current position?

17 A. President and general counsel of
18 Personalized Media Communications.

19 Q. You've been involved with PMC in
20 various capacities since 1996?

21 A. That's correct.

22 Q. When did you become president and
23 general -- well, when did you become president?

24 A. I believe sometime during 2012.

25 Q. When did you become general counsel?

1 G. HOLTZMAN

2 A. Nominally, 1997 or so.

3 Q. For a period after 1997, were you
4 doing things other than being general counsel of
5 PMC?

6 A. Yes.

7 Q. And tell me about that.

8 A. I had a private law practice in
9 Houston, Texas through approximately 2001.

10 Q. How were you -- what were you engaged
11 in from approximately 2001 until approximately
12 2012?

13 A. Various activities on behalf of
14 Personalized Media Communications, which I will
15 refer to as "PMC."

16 Q. Okay. What kind of activities were
17 those during the period 2001 to 2012?

18 A. Supervision of all matters pertaining
19 to the legal affairs of the company, including
20 patent prosecution, litigation and patent license
21 activities.

22 THE WITNESS: Can you hear me all
23 right?

24 THE REPORTER: Yes, sir.

25 BY MR. TOUTON:

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