Capital Reporting Company Juergens, Richard C. 02-12-2014

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

-----:

CARL ZEIS SMT GMBH

Petitioner

: Case IPR2013-00362

V.

: Patent 7,348,575

NIKON CORPORATION

Patent Owner

· -----:

CROSS-EXAMINATION BY DEPOSITION OF RICHARD C. JUERGENS

WEDNESDAY, FEBRUARY 12, 2014 9:10 AM

FISH & RICHARDSON One Marina Park Drive Boston, Massachusetts 02210

Sandra A. Deschaine, CSR, RPR, CLR, CRA



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             RICHARD C. JUERGENS, Deponent,
   having first been satisfactorily identified
   by the production of his Arizona driver's
 3
    license and duly sworn by the Notary Public,
   was examined and testified as follows:
 5
 6
 7
                MR. GLITZENSTEIN:
                                    Kurt
          Glitzenstein of Fish & Richardson. I
 8
 9
          represent Carl Zeiss.
                MR. WEFERS: Marc Wefers of Fish &
10
11
          Richardson. I also represent Carl
12
          Zeiss.
                MR. KERN: John Kern of Oblon
13
          Spivak. I represent Nikon
14
15
          Corporation.
                MR. MATTSON: Robert Mattson of
16
          Oblon Spivak, also representing Nikon
17
18
          Corporation.
                  CROSS-EXAMINATION
19
20
    BY MR. KERN:
21
               Good morning, Mr. Juergens.
22
          Α.
              Good morning.
          Q.
              Do you know why you're here today?
24
         Α.
               Yes.
```



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- 1 Q. Are you an expert witness for Carl
- 2 Zeiss in IPR matter IPR2013-00362?
- 3 A. I am.
- 4 Q. And that is involving U.S. Patent
- 5 Number 7,348,575?
- 6 A. That's correct.
- 7 Q. I want to let you know, before we
- 8 get into the general questions, that if at
- 9 any point during our deposition, if you don't
- 10 understand a question or a question isn't
- 11 clear, please feel free to ask me to repeat
- 12 the question or rephrase the question.
- 13 Is that clear?
- 14 A. Yes.
- 15 Q. I'm going to start off with some
- 16 general questions.
- 17 In the context of
- 18 microilithography, what does it mean to be a
- 19 dioptric projection optical system?
- 20 A. "Dioptric" means that the
- 21 projection system consists entirely of
- 22 transmitting elements or lenses and does not
- 23 contain any powered mirrors.
- Q. But could it retain or include



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