## In The Matter Of:

Wintek Corporation v. TPK Touch Solutions, Inc.

Tsung Liang (Ted) Tsai September 19, 2014

Behmke Reporting and Video Services, Inc. 160 Spear Street, Suite 300 San Francisco, California 94103 (415) 597-5600

> Original File 24784Tsai.txt Min-U-Script® with Word Index

D

Δ

~KE.

Find authenticated court documents without watermarks at docketalarm.com.

#### Wintek Corporation v. TPK Touch Solutions, Inc.

DOCKET A L A R M

	Touch Solutions, Inc.		September 19, 201
	Page 1		Page 3
1	UNITED STATES PATENT AND TRADEMARK OFFICE	1	APPEARANCES OF COUNSEL:
2	BEFORE THE PATENT TRIAL AND APPEAL BOARD	2	FOR PETITIONER: WINTEK CORPORATION
3		3	PAUL HASTINGS, LLP
4		4	BY: JOSEPH E. PALYS, ATTORNEY AT LAW
5	)	5	875 15th Street, N.W.
6	WINTEK CORPORATION, )	6	Washington, D.C. 20005
7	Petitioner, )	7	Telephone: (202) 551-1996
8	) CASE NO.	8	Email: josephpalys@paulhastings.com
9	V. ) IPR2013-00567;	9	
10	) IPR2013-00568;	10	FOR PATENT OWNER: TPK TOUCH SOLUTIONS, INC.,
11	TPK TOUCH SOLUTIONS, INC., ) IPR2013-0541	11	QUINN EMANUEL URQUHART & SULLIVAN
12	Patent Owner. )	12	BY: DEREK J. TANG, ATTORNEY AT LAW
13	)	13	50 California Street, 22nd Floor
14		14	San Francisco, California 94111
15		15	Telephone: (415) 875-6410
L6		16	Email: derektang@quinnemanuel.com
L7	DEPOSITION OF TSUNG LIANG (TED) TSAI	17	
18	FRIDAY, SEPTEMBER 19, 2014	18	ALSO PRESENT:
19		19	HUANYI LIN, IN-HOUSE COUNSEL FOR TPK.
20		20	YONGMEI LIU, INTERPRETER
21	BEHMKE REPORTING AND VIDEO SERVICES, INC.	21	MIMI S. J. LAIN, INTERPRETER
22	BY: TERRI A. HOURIGAN, CSR NO. 3838	22	
23	160 SPEAR STREET, SUITE 300	23	
24	SAN FRANCISCO, CALIFORNIA 94105	24	
25	(415) 597-5600	25	
	Pade 7		Page
	Page 2	1	Page 4
1	Page 2	1	INDEX
1 2	Page 2	2	INDEX FRIDAY, SEPTEMBER 19, 2014
	Page 2	2 3	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page
2	Page 2	2 3 4	INDEX FRIDAY, SEPTEMBER 19, 2014
2 3	Page 2	2 3 4 5	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6
2 3 4	Page 2	2 3 4 5 6	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page
2 3 4 5	Page 2	2 3 4 5 6 7	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000-
2 3 4 5 6	Page 2 Deposition of TSUNG LIANG (TED) TSAI, taken on	2 3 4 5 6 7 8	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER:
2 3 4 5 6 7 8		2 3 4 5 6 7 8 9	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 6 7 8 9	Deposition of TSUNG LIANG (TED) TSAI, taken on	2 3 4 5 6 7 8 9 10	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER:
2 3 4 5 6 7 8 9	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices	2 3 4 5 6 7 8 9 10 11	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 5 7 8 9 LO	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California	2 3 4 5 6 7 8 9 10 11 12	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 5 7 8 9 10 11	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California,	2 3 4 5 6 7 8 9 10 11 12 13	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 6 7 8 9 10 11 12	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California, commencing at 10:19 A.M., FRIDAY, SEPTEMBER 19, 2014,	2 3 4 5 6 7 8 9 10 11 12 13 14	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 6 7 8 9 10 11 12 13	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California, commencing at 10:19 A.M., FRIDAY, SEPTEMBER 19, 2014, before Terri A. Hourigan, Certified Shorthand Reporter	2 3 4 5 6 7 8 9 10 11 12 13 14 15	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 6 7 8 9 10 11 12 13 14	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California, commencing at 10:19 A.M., FRIDAY, SEPTEMBER 19, 2014, before Terri A. Hourigan, Certified Shorthand Reporter	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California, commencing at 10:19 A.M., FRIDAY, SEPTEMBER 19, 2014, before Terri A. Hourigan, Certified Shorthand Reporter	2 3 4 5 6 7 8 9 10 11 12 13 14 15	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 6 7 8 9 10 11 2 13 14 15 16	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California, commencing at 10:19 A.M., FRIDAY, SEPTEMBER 19, 2014, before Terri A. Hourigan, Certified Shorthand Reporter	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 6 7 8 9 10 11 2 13 14 15 16 17	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California, commencing at 10:19 A.M., FRIDAY, SEPTEMBER 19, 2014, before Terri A. Hourigan, Certified Shorthand Reporter	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 13 4 5 6 7 8 9 10 11 2 13 4 5 6 7 8 9 10 11 2 13 10 10 10 10 10 10 10 10 10 10 10 10 10	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California, commencing at 10:19 A.M., FRIDAY, SEPTEMBER 19, 2014, before Terri A. Hourigan, Certified Shorthand Reporter	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 20	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California, commencing at 10:19 A.M., FRIDAY, SEPTEMBER 19, 2014, before Terri A. Hourigan, Certified Shorthand Reporter	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 6 7 8 9 101 112 113 145 167 189 201 212 212	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California, commencing at 10:19 A.M., FRIDAY, SEPTEMBER 19, 2014, before Terri A. Hourigan, Certified Shorthand Reporter	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 6 7 8 9 10 112 13 4 15 6 7 8 9 10 112 13 4 15 6 7 8 9 2 2 2 2 2 2 2	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California, commencing at 10:19 A.M., FRIDAY, SEPTEMBER 19, 2014, before Terri A. Hourigan, Certified Shorthand Reporter	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE
2 3 4 5 7 8 9 10 11 12	Deposition of TSUNG LIANG (TED) TSAI, taken on behalf of WINTEK CORPORATION, PETITIONER, at Law Offices of Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22nd Floor, San Francisco, California, commencing at 10:19 A.M., FRIDAY, SEPTEMBER 19, 2014, before Terri A. Hourigan, Certified Shorthand Reporter	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	INDEX FRIDAY, SEPTEMBER 19, 2014 TSUNG LIANG (TED) TSAI Page Examination by MR. PALYS 6 -000- QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER: PAGE LINE

Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

#### Tsung Liang (Ted) Tsai September 19, 2014

#### Wintek Corporation v. TPK Touch Solutions, Inc.

Page 5         Page 5           1         TSUBJE LIANG (TED) TSAT           2         TSUBJE LIANG (TED) TSAT           3         Winkar           4         Isochibit 1023           4         Isochibit 1023           4         Isochibit 1023           5         Derek, as TPK's counseld, I just want to make           7         MR. TANG: Yee, hards accurate. Thank you.           8         INR. TANG: Yee, will look into this. It was our           9         MR. TANG: We will look into this. It was our           10         Understanding that we had. We will look into this. It was our           10         Understanding that we had. We will look into this. It was our           10         Understanding that we had. We will look into this. It was our           10         Understanding that we had. We will look into this. It was our           10         Understanding that we had. We will look into this. It was our           10         Understanding that we had. We will look into this. It was our           11         TIE WTNESS: Cook unorning. Str.           12         Q. And Wr. Tsai, did you provide a declaration for           13         THE WTNESS: Yee.           14         Yee.           15         FXALNINK           16         Yee			1	September 19,201
2         regree LLMG (TRD) TRAX         So Derek, as IPK's counsel, IPK's counsel. Thank you.           3         Buhibit 1025         mandwristen note - 1 page         14           5         MR. TANG; Yes, that's accurate. Thank you.         BY MR. PALYS:         5           6         Wather         The first securate.         WR. TANG; Yes, that's accurate. Thank you.           7         6         Wather in the first securate.         WR. TANG; Yes, that's accurate. Thank you.           7         6         Wather in the first securate.         WR. TANG; Yes, that's accurate. Thank you.           9         Wather in the first securate.         Wather in the first securate.           9         WR. TANG; Yes, that's accurate.         Wather in the first wey and a noportunity to explain whether in the first securate.           10         Wather in the first securate.         Wather in the first securate.         Wather in the first securate.           11         11         MR. TANG; Yes, that's accurate.         Wather in the first securate.           12         Good morning.         MR. TANG; Yes, that's accurate.         MR. TANG; Yes, that's accurate.           13         MR. TANG; Yes, that's accurate.         MR. TANG; Yes, that's accurate.         MR. TANG; Yes, that's accurate.           14         MR. TANG; Yes, that's accurate.         MR. TANG; Yes, that's accurate		Page 5		Page 7
2         TRUE         Page 5           3         Number         Prescription         Prescription           4         Panderitian nots - 1 page         14           5         MLR NG: Yes, that's accurate.         MLR NG: Yes, that's accurate.           7         MLR TANG: Yes, that's accurate.         MLR TANG: Yes, that's accurate.           8         MLR TANG: Yes, that's accurate.           7         MLR TANG: Yes, that's accurate.         MLR TANG: Yes, that's accurate.           8         MLR TANG: Yes, that's accurate.           9         MLR TANG: Yes, that's accurate.           9         MLR TANG: Yes, that's accurate.           10         MLR TANG: Yes, that's accurate.           11         MLR TANG: Yes, that's accurate.           12         MLR TANG: Yes, that's accurate.           13         THE WITNESS: Good moming.           14         HOR TALYS: With that, we can begin.           15         O. Can you please state your name?           16         A. Tsai, did you provide a declaration for           17         Q. And Mr. Tsai, did you provide a declaration for           18         A. Yes.           19         Q. And by TK's pattent.           10         FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.	1	EXHIBITS	1	So Derek, as TPK's counsel, I just want to make
3       MR. TANG: Yes, that's accurate. Thank you.         4       Dehibit. 1025       MR. PALYS:         5       Q. Derek, just to make sure the record is clear, I         6       WR. PALYS:         7       Q. Derek, just to make sure the record is clear, I         7       Generation of the supervised the supervised of the supervised the su	2	TSUNG LIANG (TED) TSAI		
4       BYMR. PALYS:         5       9. Derek, just to make sure the record is clear, I         6       want to give you an opportunity to explain whether in         7       fact TK's coursel did in fact schedule a reporter from         8       9. MR. TANG: We will look into this. It was our         10       understanding that we had. We will look into it.         11       11         12       0. MR. PALYS:         13       7. G. Are you also kontown as Ted Tsai?         14       13         15       9. Can you please state your name?         16       14         17       17         18       19         19       10         20       20         21       10         22       21         23       11         24       12         25       20         26       14         27       20. And Mr. Tsai, did you provide a declaration for         28       29         29       And Mr. Tsai, did you provide a declaration for         20       14         21       14         22       15         23       24 <td< td=""><td>3</td><td>Number Description Page</td><td></td><td></td></td<>	3	Number Description Page		
5       Q. Derek, just to make sure the record is clear, 1         7       6         7       6         8       7         9       MR. TANG: We will look into this. It was our understanding that we had. We will look into it.         10       10         11       MR. PALYS: We will look into this. It was our understanding that we had. We will look into it.         12       Good morning. str.         13       THE WITNESS: Good morning.         14       9       NR. TAUS: We will look into this. It was our understanding that we had. We will look into it.         13       11       MR. PALYS: With that, we can begin.         14       9       NR. TAUS: Second morning.         15       0. Can you please state your name?         16       14       BY MR. PALYS:         17       0. All reprotectings involving TFK's patent?         18       14       Post Proceedings involving TFK's patent?         19       Q. And My TFK's patent?       21         21       A. Yes.       22         22       Q. And By TFK's patent?       3         23       No. 82.17902.       3         24       Do you understand?       3         25       EXAMINATION       5       Q. And Exhibit 2	4	Exhibit 1025 Handwritten note - 1 page 14	_	
6       e want to give you an opportunity to explain whether in         7       for at PKS counsed did in fact schedule a reporter from         8       TSG; is that true?         9       MR, TANG; We will look into this. It was our         10       understanding flat we had. We will look into this it.         11       mail and the schedule a reporter from         12       Go do morning, sir.         13       THE WITNESS: Good morning.         14       14         15       Q. Can you please state your name?         16       A. Tsung Liang Tsai.         17       Q. Are you also known as Ted Tsai?         18       Q. And Mr. Tsai, did you provide a declaration for         19       Q. And Mr. Tsai, did you provide a declaration for         20       A. Yes.         21       A. Yes.         22       Q. And Mr. Tsai, did you provide a declaration for         23       No. 8217002.        24       Do you understand?         25       EXAMINATION         6       BY MR. PALYS:         7       Q. And Exhibit 2017.         34       howing been first duy swom, testified as follows:         5       EXAMINATION         6       BY MR. PALYS: <td< th=""><th>5</th><th></th><th></th><th></th></td<>	5			
7       Fact TFK's counsed did in fact schedule a reporter from         9       9         9       MR. TANG: We will look into this. It was our         10       10         11       11         12       Good morning, sir.         13       12         14       14         15       15         16       16         17       Q. Can you please state your name?         16       A. Tsung Liang Tsai.         17       Q. Are you also known as Tod Tsai?         18       17         19       Q. And Mr. Tsai, did you provide a declaration for         10       19         10       Are you also known as Tod Tsai?         12       20         13       THE WITNESS: Good morning.         14       19         15       Q. And Mr. Tsai, did you provide a declaration for         16       A. Yes.         17       Q. And Mr. Tsai, did you provide a declaration for         18       Yes.         19       Q. And Mr. Tsai, dif you provide a declaration for         10       TREWITNESS: Yes.         11       MR. PALYS:         12       TSUNG LIANG (TED) TSAI	6		_	
8       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.         2       Page 6         1       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.         2       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.         2       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.         2       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.         3       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.         4       FW WR. PALYS:         5       EXAMINATION         6       BY MR. PALYS:         7       Q. All right. This is Joseph Palys. For the         8       record, this is the deposition of Mr. Ted Tsai. This is         10       IPR 2013-00568.         11       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.         2       Page 6         Page 6       Page 6         Page 7       A. 2013-00568, yes.         8       Conder Stail (19 our our please confirm that that is         10       IPR 2013-00568, ses.         11       Charls the delay start ing of the deposition on the record. It's approximately 16/20 in         13       the morning facific Time which is almost one and a half         14       hours after the schedule start time of the deposition on its schedule.         15       Juderstand Tom TSK conset they had         16       Ny understand	7		-	
9       MR. TANG: We will look into this. It was our         10       understanding that we had. We will look into it.         11       MR. TANG: We will look into this. It was our         12       Good morning, sir.         13       11       MR. TANG: We will look into this.         14       MR. TANG: We will look into this.       MR. TANG: We will look into this.         13       MR. TANG: We will look into this.       MR. TANG: We will look into this.         14       MR. TANG: We will look into this.       MR. TANG: We will look into this.         13       MR. TANG: We will look into this.       MR. TANG: We will look into this.         14       MR. TANG: We will look into this.       MR. TANG: We will look into this.         14       MR. TANG: We will look into this.       MR. TANG: We will look into this.         14       BY MR. TANG: We will look into this.       MR. TANG: We will look into this.         15       C. Can you please state your name?       6         16       A. Yes.       19       And Mr. Tsai, did you provide a declaration for         12       Z       20       And Wr. Tsai, did you provide a declaration for         13       TRUNG LLANG (TED) TSAI       1       MR. PALYS: The handing the winese a document         14       TSUNG LLANG (TED) TSAI       1	8		-	-
10       10       understanding that we had. We will look into it.         11       MR. PALYS: With that, we can begin.       12         12       Good morning, sir.       12         13       THE WITNESS: Good morning.       14         14       HS WR. PALYS:       15         15	9		-	
11       MR. PALYS: With that, we can begin.         12       Good morning, sir.         13       13         14       14         15       15         16       16         17       17         18       17         19       16         19       17         10       17         11       MR. PALYS:         12       16         13       The WITNESS: Good morning.         14       BY MR. PALYS:         15       0. Can you please state your name?         16       A. Yes.         17       Q. Are you also known as Ted Tsai?         18       . Yes.         19       Q. And Mr. Tsai, did you provide a declaration for         20       Da you understand?         21       A. Yes.         22       Q. And by TPK's patent?         23       No. 8217902.         24       Do you understand?         25       25         26       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.         2       TSUNG LLANG (TED) TSA1         3       having been first duly swom, testified as follows:         4       BY MR. PALYS:	10		-	
12       Good morning.sir.         13       12       Good morning.sir.         14       13       THE WITNESS: Good morning.         15       13       THE WITNESS: Good morning.sir.         16       14       BY MR. PALYS:         17       16       17         18       17       Q. Are you also known as Ted Tsai?         18       18       A. Yes.         19       Q. And Mr. Tsai, did you provide a declaration for         20       20       And Mr. Tsai, did you provide a declaration for         21       A. Yes.       20         22       21       Q. And by TPK's patent?         23       No. 8217902.       21         24       Do you understand?       25         25       25       A. Yes.         24       Do you understand?       2         25       25       A. Yes.         3       THE WITNESS: Yes.       4         4       Page 6       Page 6         1       MR. PALYS: Tm handing the witness a document       2         2       Peage 7       A. Yes.       3         3       THE WITNESS: Yes.       4         4       BY MR. PALYS:	11			-
13       THE WTTNESS: Good moming.         14       BY MR, PALYS:         15       0. Can you please state your name?         16       16         17       0. Are you also known as Ted Tsai?         18       17         19       19         10       19         11       19         12       20         13       THE WITNESS: Good moming.         14       BY MR, PALYS:         19       Q. And Mr. Tsai, did you provide a declaration for         20       O. And Mr. Tsai, did you provide a declaration for         21       A. Yes.         22       Q. And Mr. Tsai, did you provide a declaration for         23       24         24       Do you understand?         25       25         26       TSUNG LIANG (TED) TSAI         2       Yes.         2       TSUNG LIANG (TED) TSAI         3       having been first duly swom, testified as follows:         4       BY MR. PALYS:         7       Q. All right. This is Joseph Palys. For the         8       record, this is the deposition of Mr. Ted Tsai. This is         9       in regards to IPR 2013-567, IPR 2013-00541, and	12			•
14       BY MR. PALYS:         15       Q. Can you please state your name?         16       16         17       Q. Are you also known as Ted Tsai?         18       17         19       Q. And Mr. Tsai, did you provide a declaration for         20       20         21       21         22       Q. And Mr. Tsai, did you provide a declaration for         20       20         21       21         22       Q. And Mr. Tsai, did you provide a declaration for         20       20         21       21         22       Q. And by TPK's patent, I mean, sir, US Patent         23       No. 8217902.         24       Do you understand?         25       25         26       A. Yes.         27       Page 6         Page 6       Page 8         1       MR. PALYS: I'm handing the witness a document         2       previously marked TPK Exhibit 2017.         3       having been first duly swom, testified as follows:       1         4       BY MR. PALYS:         7       Q. All right. This is Joseph Palys. For the       1         8       reicord, this is the deposition of Mr. Ted Tsai. This is<	13			-
15       15       Q. Can you please state your name?         16       A. Tsung Liang Tsai.         17       16       A. Tsung Liang Tsai.         18       17       Q. Are you also known as Ted Tsai?         18       A. Yes.       19         19       Q. And Mr. Tsai, did you provide a declaration for         20       20       20         21       2.       2.         22       2.       2.         23       2.3       No. 8217902.         24       24       Do you understand?         25       25       25         26       Page 6       Page 8         1       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.       1       MR. PALYS: Tm handing the witness a document         2       TSUNG LIANG (TED) TSAI       1       previously marked TPK Exhibit 2017.         3       having been first duly swom, testified as follows:       1       BY MR, PALYS:         4       BY MR, PALYS:       5       Q. And Exhibit 2017 is for IPR 2013-00568; is that         6       BY MR, PALYS:       5       Q. And Exhibit 2017.         10       IPR 2013-00571, IPR 2013-00541, and       0       A. Yes.         11       Before we get into this, I want to put some </td <td>14</td> <td></td> <td></td> <td></td>	14			
16       A. Tsung Liang Tsai.         17       Q. Are you also known as Ted Tsai?         18       16       A. Yes.         19       19       Q. And Mr. Tsai, diy ou provide a declaration for         20       20       20         21       21       21         23       22       Q. And Mr. Tsai, diy ou provide a declaration for         24       20       A. Yes.         25       21       21         24       20       Q. And by TPK's patent, I mean, sir, US Patent         25       25       A. Yes.         26       Vand Mr. Tsai, Monown as Ted Tsai?       Page 8         16       BY TSPUS       Page 8         17       Q. And by TPK's patent, I mean, sir, US Patent       Page 8         18       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.       10         2       TSUNG LIANG (TED) TSAI       1       Previously marked TPK Exhibit 2017.         3       having been first duly swom, testified as follows:       4       1       THE WITNESS: Yes.         4       BY MR. PALYS:       7       Q. All right, This is Joseph Palys. For the       8       Q. Mr. Tsai, if you could please turn to page 6,         9       in regards to IPK 2013-9056A.       10       A. Yes. <td>15</td> <td></td> <td></td> <td></td>	15			
17       Q.       Are you also known as Ted Tsai?         18       A. Yes.         19       Q.       And Mr. Tsai, did you provide a declaration for         20       Q.       And Mr. Tsai, did you provide a declaration for         21       Q.       And Mr. Tsai, did you provide a declaration for         22       Q.       And by TPK's patent, I mean, sir, US Patent         23       Q.       And by TPK's patent, I mean, sir, US Patent         24       Q.       And by TPK's patent, I mean, sir, US Patent         25       25       A. Yes.         26       Page 6       Page 8         1       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.       1         2       TSUNG LIANG (TED) TSAI       2         3       having been first duly swom, testified as follows:       3         4       BY MR, PALYS:       THE WITNESS: Yes.         5       EXAMINATION       5         6       BY MR, PALYS:       5         7       Q. All right. This is Joseph Palys. For the       right, sir?         8       record, this is the deposition of Mr. Ted Tsai. This is       9         10       IPR 2013-00568.       1         11       Before we get into this, I want to put some       1 </td <td>16</td> <td></td> <td>_</td> <td></td>	16		_	
18       A. Yes.         19       Q. And Mr. Tsai, did you provide a declaration for         20       Q. And Mr. Tsai, did you provide a declaration for         21       Q. And by TPK's patent, I mean, sir, US Patent         22       Q. And by TPK's patent, I mean, sir, US Patent         23       23         24       20         25       24         26       26         27       27         28       29         29       Q. And by TPK's patent, I mean, sir, US Patent         20       20         21       A. Yes.         22       Q. And by TPK's patent, I mean, sir, US Patent         21       A. Yes.         22       Q. And by TPK's patent, I mean, sir, US Patent         23       7         24       Do you understand?         25       25         26       A. Yes.         3       having been first duly sworn, testified as follows:         4       Fore very set into this, Is Joseph Palys. For the         8       regards to IPR 2013-0568, Iren         21       Before we get into this, I mant to put some         21       Information on the record. It's approximately 10:20 in         3       the				
<ul> <li>19</li> <li>19</li> <li>10</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>14</li> <li>14</li> <li>15</li> <li>16</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>19</li> <li>10</li> <li>10</li> <li>12</li> &lt;</ul>	18			
20       20       20       21       20       20       the IPR proceedings involving TPK's patent?         21       21       A. Yes.       22       Q. And by TPK's patent, I mean, sir, US Patent         23       23       23       20       And by TPK's patent, I mean, sir, US Patent         24       20       And by TPK's patent, I mean, sir, US Patent       No. 8217902.         24       25       A. Yes.         25       25       A. Yes.         26       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.       1       MR. PALYS: I'm handing the witness a document         2       TSUNG LIANG (TED) TSA1       3       having been first duly swom, testified as follows:       4         4       S       EXAMINATION       5       Q. And Exhibit 2017 is for IPR 2013-00568; is that         6       BY MR. PALYS:       7       A. 2013-00568, yes.       7         7       Q. And Exhibit 2017 is your could please turn to page 6, 9       9       of Exhibit 2017.         10       IPR 2013-06568.       10       A. Yes.       11         11       before we get into this, I want to put some       12       Q. So Exhibit 2017 is your declaration, correct, 15         13       the morning Pacific Time which is almost one and a halff       Q. So Exhibit 2017 is your			-	
21       23       24       24       22       Q. And by TPK's patent, I mean, sir, US Patent         23       23       24       25       22       Q. And by TPK's patent, I mean, sir, US Patent         23       23       24       25       26       Q. And by TPK's patent, I mean, sir, US Patent         24       25       25       25       A. Yes.         25       25       25       A. Yes.         26       TRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.       2       TSUNG LIANG (TED) TSAI         3       having been first duly sworn, testified as follows:       4       1       MR. PALYS: I'm handing the witness a document         2       reviously marked TPK Exhibit 2017.       3       THE WITNESS: Yes.       4         3       baving been first duly sworn, testified as follows:       4       4       4       BY MR. PALYS:       5       Q. And Exhibit 2017 is for IPR 2013-00568; is that         6       BY MR. PALYS:       5       Q. Mr. Tsai, if you could please turn to page 6,       9       of Exhibit 2017.         10       IPR 2013-00568.       10       A. Yes.       11       Q. Thank you. Can you please confirm that that is         11       before we get into this, I want to put some information on the record. It's approximately 10:20 in       14			_	
22       24       25       26       27       28       29       29       20       20       20       21       20 <td< td=""><td></td><td></td><td></td><td></td></td<>				
<ul> <li>23 No. 2217902.</li> <li>24 Do you understand?</li> <li>25 A. Yes.</li> <li>Page 6</li> <li>MR. PALYS: I'm handing the witness a document</li> <li>previously marked TPK Exhibit 2017.</li> <li>THE WITNESS: Yes.</li> <li>BY MR. PALYS:</li> <li>C. And Exhibit 2017 is for IPR 2013-00568; is that</li> <li>regords to IPR 2013-0057, IPR 2013-00541, and</li> <li>IPR 2013-00568.</li> <li>Before we get into this, I want to put some</li> <li>information on the record. It's approximately 10:20 in</li> <li>the morning Pacific Time while is almost one and a half</li> <li>hours after the scheduled start time of the deposition</li> <li>ta nine o'clock.</li> <li>My understanding is that the delay was caused</li> <li>Scheduled a reporter from TSG Reporting agency but the</li> <li>reporter did not arrive or that it was possible the</li> <li>agency did not have this deposition on its schedule.</li> <li>The court reporter wha errived this morning is</li> <li>A Yes. Image agency did not have this deposition on its schedule.</li> <li>The court reporter who arrived this morning is</li> <li>A Yes. Image agency with the deposition on its schedule.</li> <li>The court reporter who arrived this morning is</li> <li>A Yes. Image agency did not have this deposition on its schedule.</li> <li>The court reporter who arrived this morning is</li> <li>A Yes. Image agency did not have this deposition on its schedule.</li> <li>The court reporter who arrived this morning is</li> <li>A Yes. Image agency and this morning is</li> <li>A Yes. Yes. Image agency and this morning is</li> <li>A Yes. Yes.</li></ul>	22			
24       24         25       24         25       25         26       1         7       Q. All right. This is Joseph Palys. For the         8       record, this is the deposition of Mr. Ted Tsai. This is         9       integards to IPR 2013-667, IPR 2013-00541, and         10       IPR 2013-00568, IPR 2013-00541, and         11       Before we get into this, I want to put some         12       inte morning Pacific Time which is almost one and a half         13       the morning Pacific Time which is almost one and a half         14       hours after the scheduled start time of the deposition         15       at nine o'clock.         16       My understanding is that the delay was caused         17       Q. I want to just clarify for the record, too,         18< nine o'clock to begin recording.				
25       25       A. Yes.         Page 6         1       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.       1       MR. PALYS: I'm handing the witness a document         2       TSUNG LIANG (TED) TSAI       1       MR. PALYS: I'm handing the witness a document         3       having been first duly sworn, testified as follows:       4       1       MR. PALYS: Sector         4       5       EXAMINATION       5       Q. And Exhibit 2017 is for IPR 2013-00568; is that         6       BY MR. PALYS:       5       Q. And Exhibit 2017 is for IPR 2013-00568; is that         6       right, sir?       7       A. 2013-00568, yes.         8       record, this is the deposition of Mr. Ted Tsai. This is       9       of Exhibit 2017.         10       IPR 2013-6057, IPR 2013-00541, and       9       of Exhibit 2017.         11       Before we get into this, I want to put some       10       A. Yes.         12       information on the record. It's approximately 10:20 in       14       Q. So Exhibit 2017.         15       at nine o'clock.       14       Q. So Exhibit 2017 is your declaration, correct,         15       at nine o'clock to begin recording.       15       sir; 8i true you can read and write English?         19       I understand from TPK counsel they had			_	
Page 6       Page 6         1       FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.       1       MR. PALYS: I'm handing the witness a document         2       TSUNG LIANG (TED) TSAI       2       previously marked TPK Exhibit 2017.         3       having been first duly sworn, testified as follows:       4       1       MR. PALYS: I'm handing the witness a document         5       EXAMINATION       5       Q. All right. This is Joseph Palys. For the       7       A. All right. This is Joseph Palys. For the       7       A. All right. This is Joseph Palys. For the       7       A. 2013-00568, yes.       8       Q. Mr. Tsai, if you could please turn to page 6,       9       9       9       9       9       9       9       9       9       9       9       9       9       9       1       A. Yes.       10       A. Yes.       11       0       10       10       10       10       10       10       10       A. Yes.       11       10       10       A. Yes.       11       10       A. Yes.       11       10       11 </td <td>25</td> <td></td> <td></td> <td></td>	25			
1FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.1MR. PALYS: I'm handing the witness a document2TSUNG LIANG (TED) TSAIpreviously marked TPK Exhibit 2017.3having been first duly sworn, testified as follows:1THE WITNESS: Yes.42Previously marked TPK Exhibit 2017.5EXAMINATION5Q. And Exhibit 2017 is for IPR 2013-00568; is that6 BY MR. PALYS:7Q. All right. This is Joseph Palys. For the68record, this is the deposition of Mr. Ted Tsai. This is9of Exhibit 2017.9Q. All right. This is Joseph Palys. For the8Q. Mr. Tsai, if you could please turn to page 6,9in regards to IPR 2013-00568.10A. Yes.11Before we get into this, I want to put some11Q. Thank you. Can you please confirm that that is12information on the record. It's approximately 10:20 in13A. I signed it, yes.14hours after the scheduled start time of the deposition14Q. So Exhibit 2017 is your declaration, correct,15at nine o'clock.15sir?16My understanding is that the delay was caused16A. Yes.17Q. I want to just clarify for the record, too,sir, is it true you can read and write English?19I understand from TPK counsel they had19A. Yes. Yes, I have that ability.20Q. And do you understand English as it's being21agency did not have this deposition on its schedule.2123The court reporter who arrived this morning is				
1FRIDAY, SEPTEMBER 19, 2014; 10:19 A.M.1MR. PALYS: I'm handing the witness a document2TSUNG LIANG (TED) TSAIpreviously marked TPK Exhibit 2017.3having been first duly sworn, testified as follows:1THE WITNESS: Yes.42Previously marked TPK Exhibit 2017.5EXAMINATION5Q. And Exhibit 2017 is for IPR 2013-00568; is that6 BY MR. PALYS:7Q. All right. This is Joseph Palys. For the68record, this is the deposition of Mr. Ted Tsai. This is9of Exhibit 2017.9Q. All right. This is Joseph Palys. For the8Q. Mr. Tsai, if you could please turn to page 6,9in regards to IPR 2013-00568.10A. Yes.11Before we get into this, I want to put some11Q. Thank you. Can you please confirm that that is12information on the record. It's approximately 10:20 in13A. I signed it, yes.14hours after the scheduled start time of the deposition14Q. So Exhibit 2017 is your declaration, correct,15at nine o'clock.15sir?16My understanding is that the delay was caused16A. Yes.17Q. I want to just clarify for the record, too,sir, is it true you can read and write English?19I understand from TPK counsel they had19A. Yes. Yes, I have that ability.20Q. And do you understand English as it's being21agency did not have this deposition on its schedule.2123The court reporter who arrived this morning is				
2TSUNG LIANG (TED) TSAI2previously marked TPK Exhibit 2017.3having been first duly sworn, testified as follows:3THE WITNESS: Yes.44BY MR. PALYS:5EXAMINATION5Q. And Exhibit 2017 is for IPR 2013-00568; is that6BY MR. PALYS:7A. 2013-00568, yes.8record, this is the deposition of Mr. Ted Tsai. This is8Q. Mr. Tsai, if you could please turn to page 6,9in regards to IPR 2013-00568.10A. Yes.11Before we get into this, I want to put some10A. Yes.12information on the record. It's approximately 10:20 in13the morning Pacific Time which is almost one and a half14hours after the scheduled start time of the deposition14Q. So Exhibit 2017 is your declaration, correct,15at nine o'clock.15sir?16My understanding is that the delay was caused16A. Yes.17Decause no court reporter had arrived this morning at17Q. I want to just clarify for the record, too,18nine o'clock to begin recording.19A. Yes. Yes, I have that ability.20scheduled a reporter from TSG Reporting agency but the2121reporter did not arrive or that it was possible the2122agency did not have this deposition on its schedule.2223The court reporter who arrived this morning is2424from Behme Reporting who informed us that she was called2424It air to say that Mandarin i		Page 6		Page 8
2TSUNG LIANG (TED) TSAI2previously marked TPK Exhibit 2017.3having been first duly sworn, testified as follows:3THE WITNESS: Yes.44BY MR. PALYS:5EXAMINATION5Q. And Exhibit 2017 is for IPR 2013-00568; is that6BY MR. PALYS:7A. 2013-00568, yes.8record, this is the deposition of Mr. Ted Tsai. This is8Q. Mr. Tsai, if you could please turn to page 6,9in regards to IPR 2013-00568.10A. Yes.11Before we get into this, I want to put some10A. Yes.12information on the record. It's approximately 10:20 in13the morning Pacific Time which is almost one and a half14hours after the scheduled start time of the deposition14Q. So Exhibit 2017 is your declaration, correct,15at nine o'clock.15sir?16My understanding is that the delay was caused16A. Yes.17Decause no court reporter had arrived this morning at17Q. I want to just clarify for the record, too,18nine o'clock to begin recording.19A. Yes. Yes, I have that ability.20scheduled a reporter from TSG Reporting agency but the2121reporter did not arrive or that it was possible the2122agency did not have this deposition on its schedule.2223The court reporter who arrived this morning is2424from Behme Reporting who informed us that she was called2424It air to say that Mandarin i	-	EDIDAV SEDTEMPED 10 2014, 10,10 A M	-	MD DALVS. I'm handing the witness a decument
<ul> <li>a having been first duly sworn, testified as follows:</li> <li>4</li> <li>5</li> <li>EXAMINATION</li> <li>6 BY MR. PALYS:</li> <li>7</li> <li>Q. All right. This is Joseph Palys. For the</li> <li>8 record, this is the deposition of Mr. Ted Tsai. This is</li> <li>9 in regards to IPR 2013-567, IPR 2013-00541, and</li> <li>10 IPR 2013-00568.</li> <li>11 Before we get into this, I want to put some</li> <li>12 information on the record. It's approximately 10:20 in</li> <li>13 the morning Pacific Time which is almost one and a half</li> <li>14 hours after the scheduled start time of the deposition</li> <li>15 at nine o'clock.</li> <li>16 My understanding is that the delay was caused</li> <li>17 because no court reporter had arrived this morning at</li> <li>18 nine o'clock to begin recording.</li> <li>19 I understand from TPK counsel they had</li> <li>20 scheduled a reporter from TSG Reporting agency but the</li> <li>21 reporter did not arrive or that it was possible the</li> <li>22 agency did not have this deposition on its schedule.</li> <li>23 The court reporter who arrived this morning is</li> <li>24 from Behme Reporting who informed us that she was called</li> <li>3 THÉ WITNESS: Yes.</li> <li>4 Hours after the schedule us that she was called</li> <li>3 A Teis WITNE 2013-00568, is that the delay was caused</li> <li>17 Q. I want to just clarify for the record, too,</li> <li>18 sir, is it true you can read and write English?</li> <li>19 A. Yes. Yes, I have that ability.</li> <li>20 Q. And do you understand English as it's being</li> <li>21 spoken in some form?</li> <li>22 A. Yes. But my ability is concentrated in the</li> <li>23 business language used in my particular area.</li> <li>24 from Behme Reporting who informed us that she was called</li> </ul>				-
44BY MR. PALYS:5EXAMINATION5Q. And Exhibit 2017 is for IPR 2013-00568; is that6BY MR. PALYS:7A. 2013-00568, yes.7Q. All right. This is Joseph Palys. For the7A. 2013-00568, yes.8record, this is the deposition of Mr. Ted Tsai. This is9of Exhibit 2017.10IPR 2013-00568.10A. Yes.11Before we get into this, I want to put some11Q. Thank you. Can you please confirm that that is12information on the record. It's approximately 10:20 in13A. I signed it, yes.13the morning Pacific Time which is almost one and a half13A. I signed it, yes.14hours after the scheduled start time of the deposition14Q. So Exhibit 2017 is your declaration, correct,15at nine o'clock.15sir?16My understanding is that the delay was caused16A. Yes.17because no court reporter had arrived this morning at17Q. I want to just clarify for the record, too,18nine o'clock to begin recording.19A. Yes. Yes, I have that ability.20scheduled a reporter from TSG Reporting agency but the2121reporter did not arrive or that it was possible the2122agency did not have this deposition on its schedule.2223The court reporter who arrived this morning is2424from Behme Reporting who informed us that she was called2424Ro Is it fair to say that Mandarin is your native <td></td> <td></td> <td></td> <td></td>				
5EXAMINATION5Q. And Exhibit 2017 is for IPR 2013-00568; is that6BY MR. PALYS:6right, sir?7Q. All right. This is Joseph Palys. For the7A. 2013-00568, yes.8record, this is the deposition of Mr. Ted Tsai. This is909in regards to IPR 2013-567, IPR 2013-00541, and9of Exhibit 2017.10IPR 2013-00568.10A. Yes.11Before we get into this, I want to put some11Q. Thank you. Can you please confirm that that is12information on the record. It's approximately 10:20 in12your signature on page 6?13the morning Pacific Time which is almost one and a half13A. I signed it, yes.14hours after the scheduled start time of the deposition14Q. So Exhibit 2017 is your declaration, correct,15at nine o'clock.15sir?16My understanding is that the delay was caused16A. Yes.17because no court reporter had arrived this morning at17Q. I want to just clarify for the record, too,18nine o'clock to begin recording.18sir, is it true you can read and write English?19I understand from TPK counsel they had19A. Yes. Have that ability.20scheduled a reporter from TSG Reporting agency but the21spoken in some form?22agency did not have this deposition on its schedule.22A. Yes. But my ability is concentrated in the23The court reporter who arrived this morning is23business		having been first duty sworn, testified as follows.	_	
6 BY MR. PALYS:6 right, sir?7 Q. All right. This is Joseph Palys. For the7 A. 2013-00568, yes.8 record, this is the deposition of Mr. Ted Tsai. This is9 of Exhibit 2017.10 IPR 2013-00568.10 A. Yes.11 Before we get into this, I want to put some10 A. Yes.12 information on the record. It's approximately 10:20 in10 A. Yes.13 the morning Pacific Time which is almost one and a half11 Q. Thank you. Can you please confirm that that is14 hours after the scheduled start time of the deposition13 A. I signed it, yes.15 at nine o'clock.15 sir?16 My understanding is that the delay was caused16 A. Yes.17 because no court reporter had arrived this morning at17 Q. I want to just clarify for the record, too,18 nine o'clock to begin recording.19 A. Yes. Yes, I have that ability.20 scheduled a reporter from TSG Reporting agency but the21 spoken in some form?21 reporter did not have this deposition on its schedule.22 A. Yes. But my ability is concentrated in the23 The court reporter who arrived this morning is24 from Behme Reporting who informed us that she was called		ΕΥΑΜΙΝΑΤΙΟΝ		
7Q. All right. This is Joseph Palys. For the7A. 2013-00568, yes.8record, this is the deposition of Mr. Ted Tsai. This is9O9in regards to IPR 2013-567, IPR 2013-00541, and9of Exhibit 2017.10IPR 2013-00568.10A. Yes.11Before we get into this, I want to put some10A. Yes.12information on the record. It's approximately 10:20 in10A. Yes.13the morning Pacific Time which is almost one and a half13A. I signed it, yes.14hours after the scheduled start time of the deposition14Q. So Exhibit 2017 is your declaration, correct,15at nine o'clock.15sir?16My understanding is that the delay was caused16A. Yes.17because no court reporter had arrived this morning at17Q. I want to just clarify for the record, too,18nine o'clock to begin recording.19A. Yes. Yes, I have that ability.19I understand from TPK counsel they had19A. Yes. Yes, I have that ability.20scheduled a reporter from TSG Reporting agency but the21spoken in some form?22agency did not have this deposition on its schedule.22A. Yes. But my ability is concentrated in the23The court reporter who arrived this morning is24Q. Is it fair to say that Mandarin is your native				-
8record, this is the deposition of Mr. Ted Tsai. This is99in regards to IPR 2013-567, IPR 2013-00541, and10IPR 2013-00568.11Before we get into this, I want to put some12information on the record. It's approximately 10:20 in13the morning Pacific Time which is almost one and a half14hours after the scheduled start time of the deposition15at nine o'clock.16My understanding is that the delay was caused17because no court reporter had arrived this morning at18nine o'clock to begin recording.19I understand from TPK counsel they had20scheduled a reporter from TSG Reporting agency but the21reporter did not arrive or that it was possible the22agency did not have this deposition on its schedule.23The court reporter who arrived this morning is24from Behme Reporting who informed us that she was called			-	
<ul> <li>9 in regards to IPR 2013-567, IPR 2013-00541, and</li> <li>10 IPR 2013-00568.</li> <li>11 Before we get into this, I want to put some</li> <li>12 information on the record. It's approximately 10:20 in</li> <li>13 the morning Pacific Time which is almost one and a half</li> <li>14 hours after the scheduled start time of the deposition</li> <li>15 at nine o'clock.</li> <li>16 My understanding is that the delay was caused</li> <li>17 because no court reporter had arrived this morning at</li> <li>18 nine o'clock to begin recording.</li> <li>19 I understand from TPK counsel they had</li> <li>20 scheduled a reporter from TSG Reporting agency but the</li> <li>21 reporter did not arrive or that it was possible the</li> <li>22 agency did not have this deposition on its schedule.</li> <li>23 The court reporter who arrived this morning is</li> <li>24 from Behme Reporting who informed us that she was called</li> <li>9 of Exhibit 2017.</li> <li>10 A. Yes.</li> <li>11 Q. Thank you. Can you please confirm that that is</li> <li>12 your signature on page 6?</li> <li>13 A. I signed it, yes.</li> <li>14 Q. So Exhibit 2017 is your declaration, correct,</li> <li>15 sir?</li> <li>16 A. Yes.</li> <li>17 Q. I want to just clarify for the record, too,</li> <li>18 sir, is it true you can read and write English?</li> <li>19 A. Yes. Yes, I have that ability.</li> <li>20 Q. And do you understand English as it's being</li> <li>21 spoken in some form?</li> <li>22 A. Yes. But my ability is concentrated in the</li> <li>23 business language used in my particular area.</li> <li>24 from Behme Reporting who informed us that she was called</li> </ul>				
10IPR 2013-00568.10A. Yes.11Before we get into this, I want to put some10A. Yes.12information on the record. It's approximately 10:20 in11Q. Thank you. Can you please confirm that that is13the morning Pacific Time which is almost one and a half11Q. Thank you. Can you please confirm that that is14hours after the scheduled start time of the deposition12your signature on page 6?15at nine o'clock.14Q. So Exhibit 2017 is your declaration, correct,16My understanding is that the delay was caused16A. Yes.17because no court reporter had arrived this morning at17Q. I want to just clarify for the record, too,18nine o'clock to begin recording.19I understand from TPK counsel they had1920scheduled a reporter from TSG Reporting agency but the21spoken in some form?21agency did not have this deposition on its schedule.22A. Yes. But my ability is concentrated in the23The court reporter who arrived this morning is2440. Is it fair to say that Mandarin is your native				
11Before we get into this, I want to put some11Q. Thank you. Can you please confirm that that is12information on the record. It's approximately 10:20 in12your signature on page 6?13the morning Pacific Time which is almost one and a half13A. I signed it, yes.14hours after the scheduled start time of the deposition14Q. So Exhibit 2017 is your declaration, correct,15at nine o'clock.15sir?16My understanding is that the delay was caused16A. Yes.17because no court reporter had arrived this morning at17Q. I want to just clarify for the record, too,18nine o'clock to begin recording.18sir, is it true you can read and write English?19I understand from TPK counsel they had19A. Yes. Yes, I have that ability.20scheduled a reporter from TSG Reporting agency but the20Q. And do you understand English as it's being21reporter did not arrive or that it was possible the21spoken in some form?22agency did not have this deposition on its schedule.22A. Yes. But my ability is concentrated in the23The court reporter who arrived this morning is23Li fair to say that Mandarin is your native				
<ul> <li>12 information on the record. It's approximately 10:20 in</li> <li>13 the morning Pacific Time which is almost one and a half</li> <li>14 hours after the scheduled start time of the deposition</li> <li>15 at nine o'clock.</li> <li>16 My understanding is that the delay was caused</li> <li>16 A. Yes.</li> <li>17 because no court reporter had arrived this morning at</li> <li>18 nine o'clock to begin recording.</li> <li>19 I understand from TPK counsel they had</li> <li>19 I understand from TPK counsel they had</li> <li>19 reporter did not arrive or that it was possible the</li> <li>21 reporter did not have this deposition on its schedule.</li> <li>23 The court reporter who arrived this morning is</li> <li>24 from Behme Reporting who informed us that she was called</li> <li>12 your signature on page 6?</li> <li>13 A. I signed it, yes.</li> <li>14 Q. So Exhibit 2017 is your declaration, correct,</li> <li>15 sir?</li> <li>16 A. Yes.</li> <li>17 Q. I want to just clarify for the record, too,</li> <li>18 sir, is it true you can read and write English?</li> <li>19 A. Yes. Yes, I have that ability.</li> <li>20 Q. And do you understand English as it's being</li> <li>21 spoken in some form?</li> <li>22 A. Yes. But my ability is concentrated in the</li> <li>23 business language used in my particular area.</li> <li>24 from Behme Reporting who informed us that she was called</li> </ul>				
<ul> <li>13 the morning Pacific Time which is almost one and a half</li> <li>14 hours after the scheduled start time of the deposition</li> <li>15 at nine o'clock.</li> <li>16 My understanding is that the delay was caused</li> <li>17 because no court reporter had arrived this morning at</li> <li>18 nine o'clock to begin recording.</li> <li>19 I understand from TPK counsel they had</li> <li>20 scheduled a reporter from TSG Reporting agency but the</li> <li>21 reporter did not arrive or that it was possible the</li> <li>22 agency did not have this deposition on its schedule.</li> <li>23 The court reporter who arrived this morning is</li> <li>24 from Behme Reporting who informed us that she was called</li> </ul>				
14hours after the scheduled start time of the deposition14Q. So Exhibit 2017 is your declaration, correct,15at nine o'clock.15sir?16My understanding is that the delay was caused16A. Yes.17because no court reporter had arrived this morning at17Q. I want to just clarify for the record, too,18nine o'clock to begin recording.18sir, is it true you can read and write English?19I understand from TPK counsel they had19A. Yes. Yes, I have that ability.20scheduled a reporter from TSG Reporting agency but the20Q. And do you understand English as it's being21reporter did not arrive or that it was possible the21spoken in some form?23The court reporter who arrived this morning is23business language used in my particular area.24from Behme Reporting who informed us that she was called24Q. Is it fair to say that Mandarin is your native				
15at nine o'clock.15sir?16My understanding is that the delay was caused16A. Yes.17because no court reporter had arrived this morning at17Q. I want to just clarify for the record, too,18nine o'clock to begin recording.18sir, is it true you can read and write English?19I understand from TPK counsel they had19A. Yes. Yes, I have that ability.20scheduled a reporter from TSG Reporting agency but the20Q. And do you understand English as it's being21reporter did not arrive or that it was possible the21spoken in some form?22agency did not have this deposition on its schedule.22A. Yes. But my ability is concentrated in the23The court reporter who arrived this morning is23business language used in my particular area.24from Behme Reporting who informed us that she was called24Q. Is it fair to say that Mandarin is your native				• •
16My understanding is that the delay was caused16A. Yes.17because no court reporter had arrived this morning at17Q. I want to just clarify for the record, too,18nine o'clock to begin recording.18sir, is it true you can read and write English?19I understand from TPK counsel they had19A. Yes. Yes, I have that ability.20scheduled a reporter from TSG Reporting agency but the20Q. And do you understand English as it's being21reporter did not arrive or that it was possible the21spoken in some form?22agency did not have this deposition on its schedule.23A. Yes. But my ability is concentrated in the23The court reporter who arrived this morning is23business language used in my particular area.24from Behme Reporting who informed us that she was called24Q. Is it fair to say that Mandarin is your native				
<ol> <li>because no court reporter had arrived this morning at</li> <li>nine o'clock to begin recording.</li> <li>I understand from TPK counsel they had</li> <li>scheduled a reporter from TSG Reporting agency but the</li> <li>reporter did not arrive or that it was possible the</li> <li>agency did not have this deposition on its schedule.</li> <li>The court reporter who arrived this morning is</li> <li>from Behme Reporting who informed us that she was called</li> <li>J</li> <li>J</li> <li>Q. I want to just clarify for the record, too,</li> <li>sir, is it true you can read and write English?</li> <li>A. Yes. Yes, I have that ability.</li> <li>A. Methylawic that ability.</li> <li>A. Methylawic that ability.</li> <li>A. Yes. But my ability is concentrated in the</li> <li>business language used in my particular area.</li> <li>J. Is it fair to say that Mandarin is your native</li> </ol>		at nine o'clock		
18nine o'clock to begin recording.18sir, is it true you can read and write English?19I understand from TPK counsel they had19A. Yes. Yes, I have that ability.20scheduled a reporter from TSG Reporting agency but the20Q. And do you understand English as it's being21reporter did not arrive or that it was possible the21spoken in some form?22agency did not have this deposition on its schedule.22A. Yes. But my ability is concentrated in the23The court reporter who arrived this morning is23business language used in my particular area.24from Behme Reporting who informed us that she was called24Q. Is it fair to say that Mandarin is your native				A Ves
19I understand from TPK counsel they had19A. Yes. Yes, I have that ability.20scheduled a reporter from TSG Reporting agency but the20Q. And do you understand English as it's being21reporter did not arrive or that it was possible the21spoken in some form?22agency did not have this deposition on its schedule.22A. Yes. But my ability is concentrated in the23The court reporter who arrived this morning is23business language used in my particular area.24from Behme Reporting who informed us that she was called24Q. Is it fair to say that Mandarin is your native	16	My understanding is that the delay was caused	16	
<ul> <li>20 scheduled a reporter from TSG Reporting agency but the</li> <li>21 reporter did not arrive or that it was possible the</li> <li>22 agency did not have this deposition on its schedule.</li> <li>23 The court reporter who arrived this morning is</li> <li>24 from Behme Reporting who informed us that she was called</li> <li>20 Q. And do you understand English as it's being</li> <li>21 spoken in some form?</li> <li>22 A. Yes. But my ability is concentrated in the</li> <li>23 business language used in my particular area.</li> <li>24 Q. Is it fair to say that Mandarin is your native</li> </ul>	16 17	My understanding is that the delay was caused because no court reporter had arrived this morning at	16 17	Q. I want to just clarify for the record, too,
21reporter did not arrive or that it was possible the agency did not have this deposition on its schedule. 2321spoken in some form?23The court reporter who arrived this morning is 2423A. Yes. But my ability is concentrated in the business language used in my particular area.24from Behme Reporting who informed us that she was called24Q. Is it fair to say that Mandarin is your native	16 17 18	My understanding is that the delay was caused because no court reporter had arrived this morning at nine o'clock to begin recording.	16 17 18	Q. I want to just clarify for the record, too, sir, is it true you can read and write English?
22agency did not have this deposition on its schedule.22A. Yes. But my ability is concentrated in the23The court reporter who arrived this morning is23business language used in my particular area.24from Behme Reporting who informed us that she was called24Q. Is it fair to say that Mandarin is your native	16 17 18 19	My understanding is that the delay was caused because no court reporter had arrived this morning at nine o'clock to begin recording. I understand from TPK counsel they had	16 17 18 19	<ul><li>Q. I want to just clarify for the record, too, sir, is it true you can read and write English?</li><li>A. Yes. Yes, I have that ability.</li></ul>
23The court reporter who arrived this morning is23business language used in my particular area.24from Behme Reporting who informed us that she was called24Q. Is it fair to say that Mandarin is your native	16 17 18 19 20	My understanding is that the delay was caused because no court reporter had arrived this morning at nine o'clock to begin recording. I understand from TPK counsel they had scheduled a reporter from TSG Reporting agency but the	16 17 18 19 20	<ul> <li>Q. I want to just clarify for the record, too, sir, is it true you can read and write English?</li> <li>A. Yes. Yes, I have that ability.</li> <li>Q. And do you understand English as it's being</li> </ul>
24 from Behme Reporting who informed us that she was called 24 Q. Is it fair to say that Mandarin is your native	16 17 18 19 20 21	My understanding is that the delay was caused because no court reporter had arrived this morning at nine o'clock to begin recording. I understand from TPK counsel they had scheduled a reporter from TSG Reporting agency but the reporter did not arrive or that it was possible the	16 17 18 19 20 21	<ul> <li>Q. I want to just clarify for the record, too,</li> <li>sir, is it true you can read and write English?</li> <li>A. Yes. Yes, I have that ability.</li> <li>Q. And do you understand English as it's being spoken in some form?</li> </ul>
	16 17 18 19 20 21 22	My understanding is that the delay was caused because no court reporter had arrived this morning at nine o'clock to begin recording. I understand from TPK counsel they had scheduled a reporter from TSG Reporting agency but the reporter did not arrive or that it was possible the agency did not have this deposition on its schedule.	16 17 18 19 20 21 22	<ul> <li>Q. I want to just clarify for the record, too, sir, is it true you can read and write English?</li> <li>A. Yes. Yes, I have that ability.</li> <li>Q. And do you understand English as it's being spoken in some form?</li> <li>A. Yes. But my ability is concentrated in the</li> </ul>
25 in this morning as an emergency. 25 tongue.	16 17 18 19 20 21 22 23	My understanding is that the delay was caused because no court reporter had arrived this morning at nine o'clock to begin recording. I understand from TPK counsel they had scheduled a reporter from TSG Reporting agency but the reporter did not arrive or that it was possible the agency did not have this deposition on its schedule. The court reporter who arrived this morning is	16 17 18 19 20 21 22 23	<ul> <li>Q. I want to just clarify for the record, too, sir, is it true you can read and write English?</li> <li>A. Yes. Yes, I have that ability.</li> <li>Q. And do you understand English as it's being spoken in some form?</li> <li>A. Yes. But my ability is concentrated in the business language used in my particular area.</li> </ul>
	16 17 18 19 20 21 22 23 24	My understanding is that the delay was caused because no court reporter had arrived this morning at nine o'clock to begin recording. I understand from TPK counsel they had scheduled a reporter from TSG Reporting agency but the reporter did not arrive or that it was possible the agency did not have this deposition on its schedule. The court reporter who arrived this morning is from Behme Reporting who informed us that she was called	16 17 18 19 20 21 22 23 24	<ul> <li>Q. I want to just clarify for the record, too, sir, is it true you can read and write English?</li> <li>A. Yes. Yes, I have that ability.</li> <li>Q. And do you understand English as it's being spoken in some form?</li> <li>A. Yes. But my ability is concentrated in the business language used in my particular area.</li> <li>Q. Is it fair to say that Mandarin is your native</li> </ul>
	16 17 18 19 20 21 22 23 24	My understanding is that the delay was caused because no court reporter had arrived this morning at nine o'clock to begin recording. I understand from TPK counsel they had scheduled a reporter from TSG Reporting agency but the reporter did not arrive or that it was possible the agency did not have this deposition on its schedule. The court reporter who arrived this morning is from Behme Reporting who informed us that she was called	16 17 18 19 20 21 22 23 24	<ul> <li>Q. I want to just clarify for the record, too, sir, is it true you can read and write English?</li> <li>A. Yes. Yes, I have that ability.</li> <li>Q. And do you understand English as it's being spoken in some form?</li> <li>A. Yes. But my ability is concentrated in the business language used in my particular area.</li> <li>Q. Is it fair to say that Mandarin is your native</li> </ul>

DOCKET ALARM Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

## Wintek Corporation v. TPK Touch Solutions, Inc.

ARM

	Page 9		Page 11
1	A. Yes. No problem.	1	the litigation involving TPK and Wintek?
2	Q. Sir, did you sign or start over.	2	A. Yes, but I still need to clarify. I'm here to
3	Mr. Tsai, did you prepare one declaration for	3	answer questions and clarify about this declaration.
4	the IPR matters involving US Patent No. 8217902?	4	Q. I understand. I was just asking, please
5	A. May I ask you, when you say "declaration" are	5	confirm that the other declaration is a declaration you
6	you referring to this one?	6	submitted in the litigation involving TPK and Wintek.
7	Q. Yes. So this Exhibit 2017 is your declaration,	7	THE INTERPRETER LAIN: May the interpreter clarify.
8	correct?	8	The interpreter has used the word "submitted" in the
9	A. Yes.	9	litigation Wintek and TPK.
10	Q. Did you prepare another declaration other than	10	Would you like to clarify the interpretation
11	what is before you?	11	based on the question asked?
12	A. I had another declaration, but I have another	12	THE INTERPRETER LIU: The question did use the word
13	declaration.	13	"submit."
14	Q. Okay. Is that other declaration relating to	14	I stand by my interpretation. May I have the
15	these IPR matters?	15	question repeated?
16	A. Because some legalese has been used, so I'm not	16	(Record read back.)
17	very clear on that but I know that the other declaration	17	THE WITNESS: Yes.
18	is also related to our patent.	18	BY MR. PALYS:
19	Q. Was the other declaration prepared for IPR	19	Q. Sir, did you prepare the declaration yourself
20	2013-00567?	20	for Exhibit 2017?
21	A. To my knowledge, I'm here to answer questions	21	A. This document was prepared by me along with the
22	directed to this declaration but you keep asking about	22	legal department and my own team. They followed my
23	the other declaration.	23	instructions. They followed what I meant to say.
24	It's difficult for me to answer because I have	24	Q. Can you please identify the names of the people
25	not prepared myself for that declaration.	25	that helped you prepare this declaration?
	Page 10		Page 12
1		1	
1	Q. Okay. So, sir, I'm just trying to understand	1	MR. TANG: Objection. I would like to tell the
2	Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568,	2	<b>MR. TANG:</b> Objection. I would like to tell the witness he can answer the question and identify the
2 3	Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?	2 3	<b>MR. TANG:</b> Objection. I would like to tell the witness he can answer the question and identify the people.
2 3 4	Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct? THE INTERPRETER LAIN: Interpreter correction.	2 3 4	MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people. He should not reveal the subject of any
2 3 4 5	Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct? THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my	2 3 4 5	MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people. He should not reveal the subject of any privileged communications.
2 3 4 5 6	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> </ul>	2 3 4 5 6	MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people. He should not reveal the subject of any privileged communications. THE WITNESS: People in the legal department who
2 3 4 5 6 7	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> </ul>	2 3 4 5 6 7	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> </ul>
2 3 4 5 6 7 8	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> </ul>	2 3 4 5 6 7 8	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the</li> </ul>
2 3 4 5 6 7 8 9	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about</li> </ul>	2 3 4 5 6 7 8 9	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> </ul>
2 3 4 5 6 7 8 9	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> </ul>	2 3 4 5 6 7 8 9 10	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese</li> </ul>
2 3 4 5 6 7 8 9 10 11	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> </ul>	2 3 4 5 6 7 8 9 10 11	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> </ul>
2 3 4 5 6 7 8 9 10 11 12	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not</li> </ul>	2 3 4 5 6 7 8 9 10 11 12	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting</li> </ul>
2 3 4 5 6 7 8 9 10 11 12	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> <li>Q. Let me help. You understand that your</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting here with me, and here is his business card.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> <li>Q. Let me help. You understand that your declaration in Exhibit 2017 relates to an inter-party's</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting here with me, and here is his business card.</li> <li>MR. PALYS: Can you read the name, please?</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> <li>Q. Let me help. You understand that your</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting here with me, and here is his business card.</li> <li>MR. PALYS: Can you read the name, please?</li> <li>THE INTERPRETER LIU: Interpreter speaking.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> <li>Q. Let me help. You understand that your declaration in Exhibit 2017 relates to an inter-party's review of TPK's 902 Patent, correct, sir?</li> <li>A. Yes.</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting here with me, and here is his business card.</li> <li>MR. PALYS: Can you read the name, please?</li> <li>THE INTERPRETER LIU: Interpreter speaking.</li> <li>H-u-a-n-y-i, L-i-n.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> <li>Q. Let me help. You understand that your declaration in Exhibit 2017 relates to an inter-party's review of TPK's 902 Patent, correct, sir?</li> <li>A. Yes.</li> <li>Q. Is your declaration in Exhibit 2017, does that</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting here with me, and here is his business card.</li> <li>MR. PALYS: Can you read the name, please?</li> <li>THE INTERPRETER LIU: Interpreter speaking.</li> <li>H-u-a-n-y-i, L-i-n.</li> <li>BY MR. PALYS:</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> <li>Q. Let me help. You understand that your declaration in Exhibit 2017 relates to an inter-party's review of TPK's 902 Patent, correct, sir?</li> <li>A. Yes.</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting here with me, and here is his business card.</li> <li>MR. PALYS: Can you read the name, please?</li> <li>THE INTERPRETER LIU: Interpreter speaking.</li> <li>H-u-a-n-y-i, L-i-n.</li> <li>BY MR. PALYS:</li> <li>Q. Anyone else?</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> <li>Q. Let me help. You understand that your declaration in Exhibit 2017 relates to an inter-party's review of TPK's 902 Patent, correct, sir?</li> <li>A. Yes.</li> <li>Q. Is your declaration in Exhibit 2017, does that pertain to both the 568 IPR matter and the 567 IPR</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting here with me, and here is his business card.</li> <li>MR. PALYS: Can you read the name, please?</li> <li>THE INTERPRETER LIU: Interpreter speaking.</li> <li>H-u-a-n-y-i, L-i-n.</li> <li>BY MR. PALYS:</li> <li>A. Sophia Kuo, K-u-o, last name.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> <li>Q. Let me help. You understand that your declaration in Exhibit 2017 relates to an inter-party's review of TPK's 902 Patent, correct, sir?</li> <li>A. Yes.</li> <li>Q. Is your declaration in Exhibit 2017, does that pertain to both the 568 IPR matter and the 567 IPR matter?</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting here with me, and here is his business card.</li> <li>MR. PALYS: Can you read the name, please?</li> <li>THE INTERPRETER LIU: Interpreter speaking.</li> <li>H-u-a-n-y-i, L-i-n.</li> <li>BY MR. PALYS:</li> <li>A. Sophia Kuo, K-u-o, last name.</li> <li>Q. Is Sophie Kuo an attorney?</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> <li>Q. Let me help. You understand that your declaration in Exhibit 2017 relates to an inter-party's review of TPK's 902 Patent, correct, sir?</li> <li>A. Yes.</li> <li>A. Is your declaration in Exhibit 2017, does that pertain to both the 568 IPR matter and the 567 IPR matter?</li> <li>A. Yes, yes.</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting here with me, and here is his business card.</li> <li>MR. PALYS: Can you read the name, please?</li> <li>THE INTERPRETER LIU: Interpreter speaking.</li> <li>H-u-a-n-y-i, L-i-n.</li> <li>BY MR. PALYS:</li> <li>A. Sophia Kuo, K-u-o, last name.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> <li>Q. Let me help. You understand that your declaration in Exhibit 2017 relates to an inter-party's review of TPK's 902 Patent, correct, sir?</li> <li>A. Yes.</li> <li>Q. Is your declaration in Exhibit 2017, does that pertain to both the 568 IPR matter and the 567 IPR matter?</li> <li>A. Yes, yes.</li> <li>Q. Okay. Thank you. This other declaration you</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting here with me, and here is his business card.</li> <li>MR. PALYS: Can you read the name, please?</li> <li>THE INTERPRETER LIU: Interpreter speaking.</li> <li>H-u-a-n-y-i, L-i-n.</li> <li>BY MR. PALYS:</li> <li>Q. Anyone else?</li> <li>A. Sophia Kuo, K-u-o, last name.</li> <li>Q. Is Sophie Kuo an attorney?</li> <li>A. Legal department personnel.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	<ul> <li>Q. Okay. So, sir, I'm just trying to understand you have one declaration here for IPR matter 568, correct?</li> <li>THE INTERPRETER LAIN: Interpreter correction. THE INTERPRETER LIU: So I stand by my interpretation.</li> <li>BY MR. PALYS:</li> <li>Q. Are we good? And the answer?</li> <li>A. I prepared this are you still asking about the previous declaration? The other declaration?</li> <li>Q. Yes.</li> <li>A. The other declaration. So I truly do not understand your question.</li> <li>Q. Let me help. You understand that your declaration in Exhibit 2017 relates to an inter-party's review of TPK's 902 Patent, correct, sir?</li> <li>A. Yes.</li> <li>Q. Is your declaration in Exhibit 2017, does that pertain to both the 568 IPR matter and the 567 IPR matter?</li> <li>A. Yes, yes.</li> <li>Q. Okay. Thank you. This other declaration you brought up that does not pertain to the well strike</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	<ul> <li>MR. TANG: Objection. I would like to tell the witness he can answer the question and identify the people.</li> <li>He should not reveal the subject of any privileged communications.</li> <li>THE WITNESS: People in the legal department who prepared this document with me are Huanyi Lin.</li> <li>MR. PALYS: Can you please provide a spelling of the names?</li> <li>THE WITNESS: May I write down the Chinese characters?</li> <li>MR. PALYS: Sure.</li> <li>THE WITNESS: It's the gentleman that is sitting here with me, and here is his business card.</li> <li>MR. PALYS: Can you read the name, please?</li> <li>THE INTERPRETER LIU: Interpreter speaking.</li> <li>H-u-a-n-y-i, L-i-n.</li> <li>BY MR. PALYS:</li> <li>Q. Anyone else?</li> <li>A. Sophia Kuo, K-u-o, last name.</li> <li>Q. Anyone else, sir?</li> </ul>

Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

#### Wintek Corporation v. TPK Touch Solutions, Inc.

Tsung Liang (Ted) Tsai September 19, 2014

	Page 13		Page 15
1	A. No. He is a member of my own department.	1	declaration so that I can be more sure?
2	Justin Tang, T-a-n-g, last name.	2	Q. Do you have a copy of it?
3	So the last two people are people within my	3	A. Not here today, no.
4	department and the first two are with the legal	4	Q. So you would need to see that other declaration
5	department.	5	in order to answer that question; is that right?
6	Q. Anyone else, sir?	6	MR. TANG: Object to form.
7	A. No.	7	THE WITNESS: I believe so.
8	Q. Did anyone from Quinn Emanuel assist you with	8	BY MR. PALYS:
9	this declaration?	9	Q. Did that other declaration relate to TPK's 902
10	A. As far as I know I prepared the declaration	10	Patent?
11	with the people that I have just mentioned, but the	11	MR. TANG: Objection to the scope.
12	attorneys may have had discussions with those people.	12	THE WITNESS: First, as I said earlier the other
13	Q. So these four people are the only people you	13	declaration is also related to the patent.
14	communicated with in preparing your declaration; is that	14	Second, I have to emphasize, again, all I have
15	correct?	15	done to prepare for this deposition is related to this
16	A. Yes.	16	declaration.
17	Q. No telephone calls with anyone else?	17	I'm a busy person, it's impossible for me to
18	A. For the purpose of preparing this declaration?	18	keep reviewing the other document, but you have been
19	No.	19	going back to this other declaration again and again. I
20	MR. PALYS: I'm going to mark the page that Mr. Tsai	20	don't think that is fair.
21	has just identified that list the names of people he	21	BY MR. PALYS:
22	said assisted him with the preparation of his	22	Q. Okay. Have you prepared any other declarations
23	declaration in these three IPR matters as Wintek's	23	other than the two that we talked about?
24	Exhibit 2025.	24	A. No.
25	(Wintek's Exhibit 1025 was marked for	25	Q. Have you ever testified in court involving a
	Page 14		Page 16
1	identification by the court reporter.)	1	litigation?
2	THE INTERPRETER LAIN: May the interpreter clarify?	2	A. No.
3	It is actually 1025 rather than 2025.	3	Q. Sir, I would like to ask you a little bit about
4	BY MR. PALYS:	4	your background, okay?
5	Q. Mr. Tsai, have you ever been deposed before	5	A. No problem.
6	today?	6	Q. Do you have a university degree?
7	A. Two weeks ago. I was scheduled to do a	7	A. Yes.
8	deposition like this but it was canceled so today is the	8	Q. What is that degree in?
9	first time.	9	A. Mechanical engineering.

- 10 Q. You mentioned you provided a declaration --
- another declaration in the litigation involving TPK and
   Wintek, correct?
   A. Are you referring to this one?
   Q. No. I am just confirming, you have another
- 15 declaration you submitted in the litigation involving
- 16 TPK and Wintek; isn't that right?
  17 A. Yes. There was another declaration in addition
  18 to this one.
- **19 Q.** And is there anything in that other declaration
- 20 you submitted that would be considered inconsistent with
- any of the statements you made in Exhibit 2017?
- **22** A. I don't think so.

DOCK

- 23 Q. And was that another declaration you submitted 24 was that signed under oath?
- 25 A. Can I take another look at the other

- A. Mechanical engineering.
- 10 Q. And where did you get that degree at?
- 11 A. Feng Chia University in Taiwan.
- **12 Q.** Can you spell that, please?
- **13** A. You are testing my English.
- 14 Q. I understand. The best of your ability. It's
- 15 for the court reporter.
- 16 A. If I can use my phone I can look it up so I
- 17 won't give you a wrong answer.
- 18 Q. If you are happy to, yes.

19 Here we go, thank you. Is that the name of the 20 university?

- 21 A. Correct.
- 22 Q. It is F-e-n-g C-h-i-a University.
- 23 A. Yes, correct.
- 24 MR. TANG: One E.
- 25 MR. PALYS: Yeah, one E.

## DOCKET A L A R M



# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

#### LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

#### FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

### E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.