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Transcript of **PHILIP J. KOOPMAN, JR., Ph.D.**

**Date:** January 13, 2015

**Case:** SAMSUNG ELECTRONICS CO, LTD, ET AL v. REMBRANDT  
WIRELESS TECHNOLOGIES, LP(PTAB)

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Court Reporting | Videography | Videoconferencing | Interpretation | Transcription

Samsung Ex. 1319  
Samsung v. Rembrandt  
IPR2014-00519

VIDEOTAPED DEPOSITION OF PHILIP J. KOOPMAN, JR., Ph.D.  
CONDUCTED ON TUESDAY, JANUARY 13, 2015

1 (Pages 1 to 4)

1	1 UNITED STATES PATENT AND TRADEMARK OFFICE 2 BEFORE THE PATENT TRIAL AND APPEAL BOARD 3 -----x 4 SAMSUNG ELECTRONICS CO. LTD.; SAMSUNG : 5 ELECTRONICS AMERICA, INC.; SAMSUNG : 6 TELECOMMUNICATIONS AMERICA, LLC; AND : Case: 7 SAMSUNG AUSTIN SEMICONDUCTOR, LLC, : IPR2014-00518 8 Petitioners, : IPR2014-00519 9 v. : 10 REMBRANDT WIRELESS TECHNOLOGIES, LP, : Patent 8,023,580 11 Patent Owner. : 12 -----x 13 14 Videotaped Deposition of 15 PHILIP J. KOOPMAN, JR, Ph.D. 16 Pittsburgh, Pennsylvania 17 Tuesday, January 13, 2015 18 8:58 a.m. 19 20 Job No.: 72502 21 Pages: 1 - 262 22 Reported by: Constance Lee, RPR, RSA	3
2	1 APPEARANCES 2 ON BEHALF OF PETITIONERS: 3 JEFFREY A. MILLER, ESQUIRE 4 DICKSTEIN SHAPIRO LLP 5 1841 Page Mill Road 6 Palo Alto, California 94304 7 (650) 690-9500 8 9 DAN CARDY, ESQUIRE 10 DICKSTEIN SHAPIRO LLP 11 1825 Eye Street, NW 12 Washington, DC 20006 13 (202) 420-2200 14 15 16 17 18 19 20 21 22	4
2	1 Videotaped deposition of PHILIP J. KOOPMAN, JR, 2 Ph.D., held at the offices of: 3 4 5 PEPPER HAMILTON, LLP 6 500 Grant Street 7 Suite 5000 8 Pittsburgh, Pennsylvania 15219 9 (412) 454-5000 10 11 12 13 14 Pursuant to Notice, before Constance Lee, 15 Registered Professional Reporter. 16 17 18 19 20 21 22	4

VIDEOTAPED DEPOSITION OF PHILIP J. KOOPMAN, JR., Ph.D.  
CONDUCTED ON TUESDAY, JANUARY 13, 2015

5

1 CONTENTS

2 EXAMINATION OF PHILIP J. KOOPMAN, JR., Ph.D. PAGE

3 By Mr. Miller 8

4 By Mr. Haight 256

5

6

7 EXHIBITS

8 (Attached to transcript)

9 KOOPMAN DEPOSITION EXHIBIT PAGE

10 Exhibits 1232 and 1320 Data Network Evaluation 41

11 Criteria Handbook

12 Exhibits 1233 and 1321 Koopman Patent 192

13 5,450,404

14 Exhibits 1234 and 1322 Koopman Patent 194

15 5,436,901

16 Exhibits 1235 and 1323 Koopman Patent 195

17 5,535,212

18 Exhibits 1236 and 1324 Innovative Biometric 252

19 Technology v Toshiba

20 America Information

21 Systems and Authetec

22 order

6

1 EXHIBITS CONTINUED

2 KOOPMAN DEPOSITION EXHIBIT PAGE

3 Exhibits 1237 and 1325 Innovative 253

4

5 PREVIOUSLY MARKED EXHIBIT PAGE

6 Exhibits 2208 and 2302 Declaration of Dr. 11

7 Philip Koopman, Ph.D.

8 Exhibit 2209 and 2303 Embedded Communication 31

9 Protocol Options

10 Exhibits 1218 and 1317 Declaration of Jon 25

11 Mears

12

13

14

15

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17

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21

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1 PROCEEDINGS

2 VIDEOGRAPHER: Here begins tape

3 number one in the videotape deposition of Philip

4 Koopman, in the matter of Samsung Electronics

5 Company, LTD, et al. versus Rembrandt Wireless

6 Technologies, LP, et al. Filed in the United

7 States Patent and Trademark Office Case Nos.

8 IPR2014-00518 and IPR2014-00519.

9 Today's date is Tuesday, January 13th,

10 2015, and the time on the video monitor is 8:58

11 a.m.

12 The videographer today is Michael

13 Murphy representing Planet Depos. This video

14 deposition is being taking place at 500 Grant

15 Street, Pittsburgh, PA 15219.

16 Will all counsel please voice identify

17 yourselves.

18 MR. MILLER: Hi. This is Jeffrey

19 Miller representing the Samsung petitioners in the

20 IPR proceedings. With me is Daniel Cardy.

21 MR. HAIGHT: George Haight on

22 behalf of Rembrandt Wireless Technologies. The

8

1 witness Dr. Koopman.

2 VIDEOGRAPHER: The court reporter

3 today is Connie Lee representing Planet Depos.

4 Would you please swear in the witness.

5 PHILIP J. KOOPMAN, JR.

6 a witness herein, having been first duly sworn,

7 was examined and testified as follows:

8 EXAMINATION BY COUNSEL FOR THE PETITIONER

9 BY MR. MILLER:

10 Q. Good morning, Dr. Koopman.

11 A. Good morning.

12 Q. Thank you for being here this morning.

13 I'd like to start off by finding out whether or not

14 you've actually ever had your deposition taken before?

15 A. Yes, I have.

16 Q. About how many times?

17 A. I'd have to check my CV for an exact

18 number, but round number is ten.

19 Q. Ten. So you know the general ground

20 rules?

21 A. I do.

22 Q. So I'll -- I'll just reiterate the ones

9

1 that I find most important.

2 **A. Okay.**

3 Q. The first is, is that while I've never

4 worked with Connie, our court reporter, I'm sure she's

5 terrific. But as great as I'm sure she is, there's no

6 way she's going to be able to take down every word if

7 everyone in the room is talking over each other. And

8 so I'd would appreciate it, and I'll do my best at

9 this too, is if I'm speaking, if you can let me finish

10 and I'll do my best to let you finish as well. Is

11 that okay?

12 **A. Okay. No problem.**

13 Q. Also, we -- this deposition is being

14 taking -- being taken for two different inter partes

15 review proceedings, which I'm sure you understand;

16 right?

17 **A. Yes.**

18 Q. And so the very nature of that is going

19 to require that sometimes we -- we have two different

20 exhibits that are oftentimes the same that are being

21 numbered differently. And I know that's a little

22 confusing. But we're -- we're going to have to work

10

1 with each other on that. Is that okay?

2 **A. Sure. As long as I understand when**

3 **two documents are supposed to be the same, then**

4 **I'll be fine.**

5 Q. All right. That's in both of our

6 interests, so we'll do our best on that.

7 Are you under -- is there any reason that

8 we should be aware of that would prevent you from

9 testifying truthfully today?

10 **A. I -- I should be fine.**

11 Q. And one more thing, I'm -- I'm going to

12 be asking you questions today, obviously you've seen

13 this process before. And I'll do my best to ask

14 questions that are clear and make sense. But if I ask

15 you a question that you don't understand, could you

16 please let me know, and I'll try to ask it a different

17 way.

18 **A. Sure.**

19 Q. You under -- I want you to understand

20 that if you answer a question, every -- everyone is

21 going to be -- be under the belief that you understood

22 the question. Is that -- do you understand that?

11

1 **A. I understand.**

2 Q. Great.

3 So I'm going to start by have --

4 providing you with copies of the declarations you

5 filed or that you prepared in each of the IPR

6 proceedings that we're here to discuss today.

7 The first, which was filed in the IPR

8 2014-00518 proceeding was marked as Exhibit 2208. And

9 the second was filed in the IPR proceeding case number

10 IPR 2014-00519, and that was marked as Exhibit 2302.

11 (Exhibits 2208 and 2302 were

12 entered for reference.)

13 MR. HAIGHT: Thank you.

14 Q. Have you had a chance to look at those

15 two different exhibits?

16 (Witness reviews document.)

17 **A. Yes, these look like the two reports I**

18 **filed.**

19 Q. Thank you.

20 Can you tell me if there are any

21 differences substantively between the two reports?

22 **A. I -- I think there's a footnote that**

12

1 **somehow ended up in one or the other, but I --**

2 **there -- I don't intend there'd be any substantive**

3 **differences that I recall.**

4 Q. Okay. Other than the case number and

5 maybe the footnote?

6 **A. Case number, stuff like that. Yeah.**

7 Q. Okay.

8 **A. I don't -- I -- as I sit here, I can't**

9 **recall any substantive difference.**

10 Q. Okay. Just so our lives are a little bit

11 easier today, what I'd like you to be able to do is

12 use Exhibit 2208; and if it's okay with you, I'd like

13 to just use that one today so that we don't have to

14 reask the same question over and over again for the

15 other declaration.

16 **A. Sure, that's fine with we. If for**

17 **some reason something I'm not thinking of comes to**

18 **mind, I'll let you know but --**

19 Q. Thank you.

20 **A. -- as far as I know, we can just talk**

21 **about one and that should cover everything.**

22 Q. Okay. And I'll try to identify both.

13

1 **A. I'll -- I'll assume you mean both.**  
2 Q. Yeah.  
3 **A. Okay, no problem.**  
4 Q. So if you could turn to Exhibit 2208,  
5 which is also 2302, I have a couple of -- we're going  
6 to be spending a lot of time in this document today,  
7 obviously. But I'd to actually like to start by  
8 looking at Paragraph 1.  
9 **A. Okay.**  
10 Q. The first Paragraph, it starts off saying  
11 that you've been retained by the patent owner,  
12 Rembrandt.  
13 **A. Yes.**  
14 Q. Do you see that?  
15 Do you know when you were retained?  
16 **A. I looked it up, as I recall, it was**  
17 **about three months ago.**  
18 Q. Do you recall who reached out to you?  
19 **A. Oh, boy. I don't remember. There --**  
20 **there were several people involved. I don't**  
21 **remember who this was, the first phone call was.**  
22 Q. I saw in your CV though it looks like you

14

1 do do some expert witness things, so it's not --  
2 wasn't something that came completely out of the blue;  
3 right?  
4 **A. It was out of the blue in terms of it**  
5 **being a cold call.**  
6 Q. Yeah.  
7 **A. But you know the -- I -- I do not**  
8 **publicly advertise by expert witness, but as a**  
9 **professor university, most of us get these calls**  
10 **all the time, so it was nothing unusual to be**  
11 **called.**  
12 Q. Okay. And from the time that you've been  
13 retained up until you -- this -- dec -- these two  
14 declarations were prepared, about how much time did  
15 you put into this case?  
16 **A. It was about 45 hours excluding this**  
17 **week. So -- let me say it a different way. I -- I**  
18 **billed for about 45 hours and -- and haven't done**  
19 **this week yet.**  
20 Q. Have you ever talked to the inventor of  
21 the '580 patent?  
22 **A. Not that I can recall.**

15

1 Q. And before you started work on this case,  
2 had you ever heard of this guy?  
3 **A. No.**  
4 Q. That guy being Mr. Bremer?  
5 **A. Mr. Bremer, right.**  
6 Q. Okay. Thank you.  
7 So -- now you said you did some work this  
8 week. Was that done in preparation for your  
9 deposition today?  
10 **A. Yes.**  
11 Q. Can you tell us what you did to prepare  
12 for your deposition?  
13 **A. I spent a couple hours reading**  
14 **documents on Monday night, and then I had a meeting**  
15 **yesterday afternoon, evening for a few hours.**  
16 Q. Was that meeting with Mr. Haight?  
17 **A. Yes.**  
18 Q. What documents did you review to prepare?  
19 **A. I looked at my declaration and went**  
20 **back to look at the patents. I looked through some**  
21 **pieces of some other things, you know, I don't --**  
22 **if -- if the list is important, I can try to**

16

1 **remember, but it was mostly -- it was mostly the**  
2 **documents -- some of the documents that are in my**  
3 **appendix of materials. So I looked at the patents.**  
4 **I looked at a couple pages of Dr. Goodman's -- I**  
5 **think it was his deposition. I know I looked at**  
6 **his declaration as well. I read my article again.**  
7 **And I may have looked at some of the other stuff.**  
8 **I don't recall the whole list.**  
9 Q. Do you remember what pages of  
10 Dr. Goodman's deposition you looked at?  
11 **A. I -- I don't remember. I mean, I --**  
12 **at one point I read the whole thing, just not this**  
13 **week.**  
14 Q. Did you ever -- it's not listed here, but  
15 I'm just wondering. Did you ever look at any of the  
16 expert reports that were prepared in the litigation  
17 that's going on between Rembrandt and Samsung?  
18 **A. I have not seen those -- well, let**  
19 **me -- let me clarify that. I -- I think I looked**  
20 **at a couple paragraphs from Dr. Akl's report,**  
21 **A-K-L, which were summarizing our phone**  
22 **conversation. But beyond that, I have not looked**

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