

- VOLUME A -

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE DISTRICT OF DELAWARE

INTERDIGITAL : CIVIL ACTION
 COMMUNICATIONS, INC., a :
 Delaware corporation, :
 INTERDIGITAL TECHNOLOGY :
 CORPORATION, a Delaware :
 corporation, IPR :
 LICENSING, INC., a :
 Delaware corporation, :
 and INTERDIGITAL :
 HOLDINGS, INC., a :
 Delaware corporation, :

Plaintiffs, :

vs. :

ZTE CORPORATION, and ZTE :
 (USA) INC., :

Defendants :
 and Counterclaim :
 Plaintiffs, :

NO. 13-00009-RGA

- - -

Wilmington, Delaware
 Monday, October 20, 2014
 9:02 o'clock, a.m.

- - -

BEFORE: HONORABLE RICHARD G. ANDREWS,
 U.S.D.C.J., and a jury

- - -

APPEARANCES:

Hawkins Reporting Service
 715 N. King Street - Wilmington, Delaware 19801

IPR Licensing, Inc.
 Exhibit 2015

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SMITH KATZENSTEIN & JENKINS
BY: NEAL C. BELGAM, ESQ.

-and-

LATHAM & WATKINS LLP
BY: RON E. SHULMAN, ESQ.
(Menlo Park, California)

-and-

LATHAM & WATKINS LLP
BY: JONATHAN D. LINK, ESQ. And
JULIE M. HOLLOWAY, ESQ.
(San Francisco, California)

-and-

LATHAM & WATKINS LLP
BY: MAXIMILIAN A. GRANT, ESQ. And
BERT C. REISER, ESQ.
(Washington, D.C.)

Counsel for Plaintiffs
InterDigital Communications, Inc.,
InterDigital Technology Corporation,
IPR Licensing, Inc., and
InterDigital Holdings, Inc.

FARNAN LLP
BY: KELLEY E. FARNAN, ESQ.

-and-

APPEARANCES (Continued):

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BRINKS GILSON & LIONE
BY: RALPH J. GABRIC, ESQ. And
CHARLES M. McMAHON, ESQ.
(Chicago, Illinois)

-and-

BRINKS GILSON & LIONE
BY: JAY H. REIZISS, ESQ.
(Washington D.C.)

Counsel for Defendants
ZTE Corp. And ZTE (USA) Inc.

- - -

1 THE COURT: All right. Mr. Gabric,
2 I'll recognize you for the opening on behalf of
3 ZTE.

4 MR. GABRIC: Thank you very much,
5 Your Honor.

6 Good afternoon. My name is Ralph
7 Gabric and I represent ZTE Corporation and ZTE
8 U.S.A.

9 And the evidence is going to tell a
10 different story than the one you just heard. The
11 evidence is going to show that ZTE does not and
12 has not infringed InterDigital's patents.

13 I'll get to that in a little bit,
14 but I'd like to introduce a few folks. With me
15 is ZTE's rep, Mr. Waiman Lam who's the senior
16 director. Can you stand, please?

17 And also with me are my colleagues
18 who are going to assist me in presenting ZTE's
19 case. With me, Charles McMahon, Kelly Farnan and
20 Jay Reiziss.

21 Now, who is ZTE?
22 ZTE was started in China in 1985. And through
23 innovation and plain old-fashioned hard work has
24 quietly grown to one of the largest cellphone

1 manufacturers in the world.

2 ZTE has facilities all over the
3 world, including here in the United States. ZTE
4 spends billions of dollars on research and
5 development. It spends extraordinary resources
6 on developing technology.

7 And ZTE is one of the largest patent
8 filers in the world. Over the last couple of
9 years, ZTE has ranked either number one or two in
10 worldwide patent filings.

11 ZTE also sells products all over the
12 world. So if you want to talk about who the
13 innovators are, ZTE has the products to prove
14 that.

15 Some of you -- I don't think many of
16 you have heard of ZTE before, but many of our
17 cellphones are sold by companies like Verizon,
18 AT&T, Sprint, T-Mobile. They sold under their
19 own brands under their carrier brand, but we
20 often times manufacture those phones.

21 Let me be very clear and direct.
22 ZTE does not take other people's patents. We
23 don't take other people's technology without
24 permission.

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