

UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE INC., SAMSUNG	)	
ELECTRONICS AMERICA, INC. AND	)	
SAMSUNG ELECTRONICS CO.,	)	
LTD.,	)	
	)	
Petitioners,	)	
	)	
vs.	)	No. IPR2014-00532
	)	Patent 5,959,633
MICROGRAFX, LLC,	)	
	)	
Patent Owner.	)	
_____	)	

DEPOSITION OF  
ANSELMO LASTRA, PH.D.

\_\_\_\_\_  
FRIDAY, MARCH 27, 2015

REPORTED BY: HOLLY THUMAN, CSR No. 6834, RMR, CRR

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INDEX OF EXAMINATIONS

EXAMINATION BY:	PAGE
MR. WILSON	4
MR. ALMELING	80
MR. WILSON	82
MR. ALMELING	97

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EXHIBITS

(No exhibits were marked.)

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1 SAN FRANCISCO, CALIFORNIA; FRIDAY, MARCH 27, 2015

2 9:08 A.M.

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4 ANSELMO LASTRA, PH.D.,

5 \_\_\_\_\_  
6 called as a witness, who, having been first duly sworn,  
7 was examined and testified as follows:

8 ---oOo---

9 PROCEEDINGS

10 MR. WILSON: So let's just have all the  
11 counsel identify themselves.

12 MR. ALMELING: David Almeling of O'Melveny &  
13 Myers on behalf of Petitioners and the witness, who is  
14 an expert for Petitioners.

15 MR. HAWKINS: Michael Hawkins, Fish &  
16 Richardson, on behalf of the petitioners and the  
17 expert.

18 MR. BISENIUS: Patrick Bisenius, Fish &  
19 Richardson, on behalf of the petitioners and the  
20 expert.

21 MR. WILSON: Douglas Wilson, on behalf of  
22 Patent Owner.

23 --o0o--

24 EXAMINATION BY MR. WILSON

25 BY MR. WILSON:

1 Q. Okay. Dr. Lastra, I'm going to hand you what  
2 is marked as Google Exhibit 1011. Would you just  
3 please take a look at that document and confirm that  
4 that is your second declaration submitted in the  
5 IPR2014-00532?

6 A. Yes, it seems to be. And it seems to all be  
7 here.

8 Q. Okay. I notice on page 44 of this copy, for  
9 whatever reason, your signature doesn't appear. I'm  
10 not sure why that is. It may be an artifact of  
11 copying.

12 A. I don't know.

13 MR. ALMELING: Counsel, I have a copy of the  
14 '633 declaration that does have the signature. And I'm  
15 not sure from where you got the copy that does not, but  
16 perhaps that's something that we can address later.

17 MR. WILSON: Sure. I suspect it's a printing  
18 artifact, and I just noticed that -- I assume that --  
19 in fact, I'll look at the file copy that we have. But  
20 I am going to assume that it has his signature on it.

21 Yeah. Just -- I guess because it's in blue,  
22 it didn't print.

23 Q. Anyway, if you would like to refer to  
24 Mr. Almeling's copy for anything just to confirm that  
25 this is in fact your declaration. I will represent to

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