

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

LG DISPLAY CO., LTD.,)	
)	
Petitioner,)	Case: IPR2014-01096
)	Patent: 7,537,370
VS.)	
)	Case: IPR2014-01097
INNOVATIVE DISPLAY)	Patent: 7,300,194
TECHNOLOGIES LLC,)	
)	
Patent Owner.)	

 VIDEOTAPED DEPOSITION OF
 KENNETH WERNER
 JUNE 16, 2015
 VOLUME 1

VIDEOTAPED DEPOSITION OF KENNETH WERNER,
 produced as a witness at the instance of the Petitioner,
 and duly sworn, was taken in the above-styled and
 numbered cause on the 16th of June, 2015, from 9:00 a.m.
 to 2:19 p.m., before Cinnamon Boyle, CSR in and for the
 State of Texas, reported by machine shorthand, at the
 offices of Bragalone Conroy PC, 2200 Ross Avenue, Suite
 4500 W, Dallas, Texas, pursuant to the Federal Rules of
 Civil Procedure.

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A P P E A R A N C E S

FOR THE PETITIONER:

AMANDA K. STREFF
MAYER BROWN LLP
71 South Wacker Drive
Chicago, Illinois 60606-4637
(312) 451-8200
astreff@mayerbrown.com

ROBERT G. PLUTA
MAYER BROWN LLP
71 South Wacker Drive
Chicago, Illinois 60606-4637
(312) 451-8200
rpluta@mayerbrown.com

FOR THE PATENT OWNER:

NICHOLAS C. KLIEWER
BRAGALONE CONROY PC
Chase Tower
2200 Ross Avenue
Suite 4500 W
Dallas, Texas 75201-7924
(214) 785-6686
nkliewer@bcpc-law.com

T. WILLIAM KENNEDY
BRAGALONE CONROY PC
Chase Tower
2200 Ross Avenue
Suite 4500 W
Dallas, Texas 75201-7924
(214) 785-6674
bkennedy@bcpc-law.com

ALSO PRESENT:

MEHDI BRAILEY - VIDEOGRAPHER

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P R O C E E D I N G S

THE VIDEOGRAPHER: Today's date is June 16, 2015. We are on the record at 9:00 a.m. for the deposition of Mr. Kenneth Werner.

Will counsel please state their name for the record.

MS. STREFF: Amanda Streff from Mayer Brown on behalf of the Petitioner, LG Display.

MR. PLUTA: Robert Pluta for Mayer Brown on behalf of LG Display.

MR. KLIEWER: Nick Kliewer for Bragalone Conroy on behalf of the patent owner, Innovative Display Technologies, and with me is also Bill Kennedy.

THE VIDEOGRAPHER: Counsel, please state any agreements for the record.

MR. PLUTA: I don't believe there are any --

MS. STREFF: Not any.

THE VIDEOGRAPHER: Court Reporter, please swear in the witness.

KENNETH WERNER,
having been first duly sworn testified as follows:

EXAMINATION

BY MS. STREFF:

Q. Mr. Werner, can you please state your full

1 name and address for the record?

2 A. Kenneth Werner, 2 Shadybrook Lane, Norwalk,
3 Connecticut.

4 Q. And, Mr. Werner, I just introduced myself,
5 but, again, I'm Amanda Streff, and I represent IG
6 Display, and I'll be asking you a number of questions
7 today.

8 I think we all know you've been deposed a
9 few times on matters related to these patents, so I -- I
10 understand you know the procedures, but I'll just go
11 over a few -- few things just so we're on the same page,
12 okay?

13 A. Sure.

14 Q. Because there's a court reporter here, you'll
15 need to give oral responses -- do you understand that?

16 A. I do.

17 Q. And if you answer a question, I'll assume you
18 understood it as ask- -- asked; is that fair?

19 A. That is fair.

20 Q. And if at any point you need to take a break,
21 all I ask is that we make sure there's not a question
22 pending, and then we can take a break, okay?

23 A. Okay.

24 Q. And you've taken an oath today that binds you
25 to give truthful testimony. Is there any reason you

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