

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

ZHONGSHAN BROAD OCEAN)
MOTOR CO., LTD, BROAD)
OCEAN MOTOR LLC, AND BROAD)
OCEAN TECHNOLOGY, LLC.)
Petitioners,)
))
vs.) CASE NO. IPR2014-01121
) PATENT 7,626,349 B2
NIDEC MOTOR CORPORATION)
Patent Owner.)

ORAL TELEPHONIC DEPOSITION

DR. MARK EHSANI

NOVEMBER 19, 2015

ORAL DEPOSITION OF DR. MARK EHSANI, produced as a witness at the instance of the Patent Owner and duly sworn, was taken in the above-styled and numbered cause on the 19th day of November, 2015, from 11:06 a.m. to 12:07 p.m., before Lori H. Hudgins, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the offices of Locke Lord, 600 Travis Street, Suite 2800, Houston, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.



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EXHIBITS

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Exhibit 1001	US Patent 7,626,349 B2	4
Exhibit 1005	JP 2003-348885 Abstract	4
Exhibit 1009	Declaration of Dr. Mark Ehsani re Patent 7,626,349	4



1 DR. MARK EHSANI,
2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 BY MR. SCOTT BROWN

5 Q. Dr. Morning, Dr. Ehsani.

6 A. Good morning. How are you?

7 Q. I'm fine. Thanks.

8 You understand that there is an
9 additional inter partes review that has been
10 consolidated into what we've referred to as the 1121
11 matter, the lawyers do anyway, and that it introduces a
12 new ground asserting anticipation of a reference called
13 Hideji?

14 A. I do.

15 Q. Okay. And so you're familiar with the Hideji
16 reference?

17 A. Yes, sir.

18 Q. Okay. I'm going to focus on that since that's
19 the sole new issue that's been introduced into this
20 matter.

21 MR. BROWN: And I would ask that the
22 court reporter hand to the witness what has been
23 previously marked as Exhibit 1005.

24 COURT REPORTER: (Complies.)

25 Q. (BY MR. BROWN) Do you have Exhibit 1005 in

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1 front of you, Dr. Ehsani?

2 A. I do.

3 Q. And this is -- confirm for me that what's in
4 front of you is the English language translation of the
5 Japanese reference?

6 A. It is an English language document. I have to
7 read through it to see exactly what it stands for.

8 Q. Okay. Well, just take a moment and let me
9 know if you're satisfied that that is the translation of
10 the Hideji reference.

11 MR. MEYER: Okay. Just for the record, I
12 am going to object to this exhibit because it does not
13 include the attestation statement.

14 I'll allow you to ask him questions, but
15 this -- this objection stands if you're going to use
16 this version in any submission in the court.

17 MR. BROWN: Okay.

18 MR. MEYER: Okay.

19 A. I do not see Hideji name mentioned anywhere.
20 I'm willing to work with this if you represent that this
21 is, in fact, a reliable translation of that patent.

22 Q. (BY MR. BROWN) Okay. Would you look at -- I
23 believe at the end of the document there should be some
24 figures.

25 A. Yes.

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