

1 IN THE UNITED STATES PATENT AND  
2 TRADEMARK OFFICE  
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4 -----X  
SAMSUNG ELECTRONICS CO., LTD.;  
5 and SAMSUNG ELECTRONICS AMERICA, INC.,

6 Petitioners,

7 -against-

8 AFFINITY LABS OF TEXAS, LLC,

9 Patent Owner.

10 Case No.: IPR2014-01181  
Patent 8,532,641 B2

11 -----X  
12 1211 Ave. of the Americas  
13 New York, New York

14 September 30, 2015  
15 8:58 a.m.

16 Deposition of SCHUYLER QUACKENBUSH, Ph.D.,  
17 pursuant to Notice, before Darby Ginsberg, RPR,  
18 a Notary Public of the State of New York.  
19  
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25

1 A P P E A R A N C E S:

2

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----- I N D E X -----

WITNESS	EXAMINATION BY	PAGE
SCHUYLER QUACKENBUSH	MR. SCHULTZ	4

----- E X H I B I T S -----

QUACKENBUSH	DESCRIPTION	FOR I.D.
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(NO EXHIBITS MARKED)

1 S H U Y L E R Q U A C K E N B U S H, Ph.D.,  
2 called as a witness, having been first duly  
3 sworn, was examined and testified as follows:  
4

5 EXAMINATION BY

6 MR. SCHULTZ:

7 Q. Good morning. Dr. Quackenbush, how are  
8 you today?

9 A. Fine, thank you.

10 Q. We have taken several depositions now in  
11 these proceedings, and I am not going to repeat  
12 all of the varied preliminaries of deposition I  
13 assume that you are familiar with those from our  
14 previous encounters?

15 A. I do remember all of our introductory  
16 remarks.

17 Q. Is there any reason today why you cannot  
18 testify truthfully?

19 A. There is none.

20 Q. You are not on any medications that may  
21 affect your ability to testify truthfully?

22 A. No.

23 Q. Now, we are here in response to your  
24 rebuttal report, which is Exhibit 1025, is that  
25 your understanding?

1 A. Yes, it is.

2 Q. So if refer to it as your rebuttal  
3 report or rebuttal declaration, you understand I  
4 am talking about the same thing?

5 A. Yes, I do.

6 Q. And you understand that there were three  
7 IPR proceedings that were consolidated into one,  
8 and there are exhibits ranged from anywhere from  
9 1001 to something to 1100 to something, and 1200  
10 to something, does that sound about right, to  
11 your recollection?

12 A. Yes, I do understand that.

13 Q. Okay. And I am going to refer to those  
14 exhibit numbers throughout this deposition.  
15 Okay?

16 A. Very good.

17 Q. And there was some overlap at some of  
18 the exhibits, for instance, like the Ericsson  
19 article I think is in 1007 and 1107?

20 A. I believe that's correct.

21 Q. Okay. So if I refer to 1007, I am  
22 referring to the same document that was found in  
23 both exhibits.

24 A. I am fine with that.

25 Q. Okay. We have various binders in front

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