

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

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5 SERVICENOW, INC.,

6 Petitioner,

Case

IPR2015-00523

Patent 6,321,229

7 vs.

8 HEWLETT-PACKARD COMPANY,

9 Patent Owner.

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14 VIDEO DEPOSITION OF DAVID KLAUSNER

15 Palo Alto, California

16 Wednesday, October 21, 2015

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23 REPORTED BY:

24 CYNTHIA MANNING, CSR No. 7645, CLR, CCRR

25 JOB NO. 99056

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October 21, 2015

9:30 a.m.

Deposition of DAVID KLAUSNER, taken on  
behalf of Patent Owner, at Cooley LLP, 3175  
Hanover Street, Palo Alto, California,  
before Cynthia Manning, Certified Shorthand Reporter  
No. 7645, Certified LiveNote Reporter, California  
Certified Realtime Reporter.

1     A P P E A R A N C E S:

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4             Attorneys for Petitioner

5                     COOLEY

6                     3175 Hanover Street

7                     Palo Alto, CA 94304

8     BY:   ANDREW MACE, ESQ.

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10

11             Attorneys for Patent Owner

12                     WILMERHALE

13                     950 Page Mill Road

14                     Palo Alto, CA 94304

15     BY:   JOSEPH HAAG, ESQ.

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17

18             Also present:

19                     Aric Kerhoulas, Videographer

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1 PALO ALTO, CALIFORNIA;

2 WEDNESDAY, OCTOBER 21, 2015; 9:00 A.M.

3  
4 THE VIDEOGRAPHER: Good morning.

5 This marks the beginning of Tape 1 of the  
6 videotaped deposition of David Klausner in the  
7 matter of ServiceNow, Incorporated, versus  
8 Hewlett-Packard Company, in the United States Patent  
9 and Trademark Office. Case Number IPR2015-00523.

10 This deposition is being held at 3175  
11 Hanover Street, in Palo Alto, California. The date  
12 today is October 21st, 2015. The time is 9:01 a.m.

13 My name is Aric Kerhoulas, from TSG  
14 Reporting.

15 Our court reporter today is Cynthia  
16 Manning, in association with TSG Reporting.

17 Will counsel please introduce yourselves  
18 for the record.

19 MR. HAAG: Joseph Haag from WilmerHale  
20 representing the Patent Owner, Hewlett-Packard.

21 MR. MACE: Andrew Mace with Cooley for the  
22 Petitioner, ServiceNow.

23 THE VIDEOGRAPHER: Will the court reporter  
24 please swear in the witness.

25 //

1                           DAVID KLAUSNER,  
2                   having first been duly sworn, testified as  
3                   follows:  
4

5                   THE VIDEOGRAPHER: Please proceed.  
6

7   EXAMINATION

8           BY MR. HAAG:

9                   Q. Good morning.

10                  A. Good morning.

11                  Q. Can you please state your full name?

12                  A. David Klausner.

13                  Q. And am I right that it's Mr. Klausner, not  
14           Dr. Klausner?

15                  A. Yes.

16                  Q. Okay. Have you been deposed before?

17                  A. Yes.

18                  Q. Roughly how many times?

19                  A. I think in 60 different matters.

20                  Q. So quite a few times.

21                  A. Yes.

22                  Q. You've been through this before.

23                  A. I have not been deposed in an IPR  
24           proceeding.

25                  Q. You've never been an expert in an IPR?

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