

1 UNITED STATES PATENT AND TRADEMARK OFFICE  
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD  
3 GOOGLE, INC.  
4 Petitioner, Case No,  
5 vs. IPR2015-00806  
6 SUMMIT 6 LLC, Patent No. 7,765,482  
7 Patent Owner Title: Web-Based  
8 Media Submission Tool  
9

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11 BEFORE THE PATENT TRIAL AND APPEAL BOARD  
12 GOOGLE, INC.  
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14 vs. IPR2015-00807  
15 SUMMIT 6 LLC, Patent No. 8,612,515  
16 Patent Owner Title: Web-Based Media  
17 Submission Tool  
18

18 Deposition of Paul Clark  
19 November 18, 2015  
20 At 8:30 a.m.

21 Taken at:  
22 Kilpatrick Stockton  
23 Winston-Salem, North Carolina  
24

25 Reported by LeShaunda Cass-Byrd, CSR, RPR

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1	DEPOSITION OF PAUL CLARK,		
2	By Mr. Schmaker		4
3	DEPOSITION EXHIBITS		
4	EXHIBIT	DESCRIPTION	PAGE
5	Exhibit 1003	Declaration of Paul Clark Under	
6		37 C.F.R. Section 1.68	5
7	Exhibit 1004	United States Patent Creamer,	
8		Et al Patent Number 6,930,709 B1	24
9	Exhibit 1005	United States Patent Mayle, et al	
10		Patent Number 6,223,190 B1	39
11	Exhibit 1006	United States Patent Mayle, et al	
12		Patent Number 6,018,774	88
13	Exhibit 1007	United States Patent Narayen,	
14		Et al. Patent Number 6,035,323	87
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1 PAUL CLARK,  
2 having been first duly sworn, was examined and  
3 testified as follows:

4 EXAMINATION

5 BY MR. SHUMAKER:

6 Q. Good morning, sir.

7 A. Good morning.

8 Q. Could you please state your name?

9 A. Paul Clark.

10 Q. Dr. Clark, where do you work?

11 A. I work in Bethesda, Maryland, for my  
12 company, Paul C. Clark, LLC.

13 Q. And what does your company do?

14 A. We do a range of consulting, investing,  
15 product development. All sorts of things.

16 Q. What technology are you consulting for your  
17 company?

18 A. Usually network-based systems.

19 Q. And what do you mean by network-based  
20 systems?

21 A. Computers that are connected to a network.

22 Q. Wireless and wired?

23 A. Yes.

24 Q. Do you specialize in any particular type of  
25 networks?

1 A. No.

2 (Patent Owner Exhibit 1003 was marked for  
3 identification.)

4 BY MR. SHUMAKER:

5 Q. Dr. Clark, I'm going to hand you  
6 Exhibit 1003, which is your expert report, which you  
7 previously filed in both the eight or six native set  
8 cases.

9 Dr. Clark, have you seen Exhibit 1003  
10 before?

11 A. Yes.

12 Q. And what is Exhibit 1003?

13 A. It's my declaration.

14 Q. Can you turn to Page 43, please. Do you  
15 see your signature on Page 43?

16 A. Yes.

17 Q. And the last sentence above your signature  
18 says: I declare under penalty of perjury, that the  
19 foregoing declaration is true and correct.

20 Is that a true and correct statement?

21 A. Yes.

22 Q. And I would like for you to turn to  
23 Paragraph 52, which is on Page 31. And first I want  
24 to direct your attention to the second sentence of  
25 Paragraph 52, which states: It would have been

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