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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

THE MANGROVE PARTNERS MASTER FUND, LTD.

and

APPLE, INC.

Petitioners

v.

VIRNETX INC.

Patent Owner

Case IPR2015-01046

Patent No. 6,502,135

Case IPR2015-01047

Patent No. 7,490,151

DEPOSITION OF ROCH GUERIN, PH.D.

Washington, D.C.

Monday, February 1, 2016

1 Deposition of ROCH GUERIN, PH.D., called
2 for examination pursuant to notice, on Monday,
3 February 1, 2016 in Washington, D.C. at the offices of
4 Paul Hastings LLP, 875 15th Street, Northwest,
5 Washington, D.C., at 8:07 a.m., before Karen Young, a
6 Notary Public within and for the District of Columbia,
7 when were present on behalf of the respective parties:

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1 ON BEHALF OF THE MANGROVE PARTNERS
2 MASTER FUND, LTD.:

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8 ON BEHALF OF APPLE, INC. AND THE WITNESS:
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15 ON BEHALF OF VIRNETX INC. :
16 JOSEPH E. PALYS, ESQUIRE
17 DANIEL ZEILBERGER, ESQUIRE
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22 josephpals@paulhastings.com
 (202) 551-1996

1 P R O C E E D I N G S

2 ROCH GUERIN, PH.D.,

3 having been duly sworn, was examined as follows:

4 EXAMINATION BY COUNSEL FOR VIRNETX INC.

5 BY MR. PALYS:

6 Q. Good morning.

7 A. Morning.

8 Q. Can you please state your name for the
9 record?

10 A. First name is Roch, R-O-C-H. Last name is
11 Guerin, G-U-E-R-I-N.

12 Q. And just before we start, I just want to
13 make sure that we have on the record that VirnetX
14 still maintains its objections on the record of
15 Apple's participation in these proceedings, and that
16 what appears to be Apple's counsel defending Mr. -- or
17 Dr. Guerin today. Can you please state your address?

18 A. Home address?

19 Q. Yes, please. Sorry.

20 A. It's 8025 Bonhomme Avenue, that's B as in
21 boy, O-N-H-O-M-M-E, Apartment 1706, Clayton,
22 C-L-A-Y-T-O-N, Missouri 63105.

1 Q. Dr. Guerin, we've met before, correct?

2 A. That's correct.

3 Q. So -- and I understand from our previous
4 meeting that you've been deposed before, correct?

5 A. That is correct.

6 Q. All right, so you understand how this is
7 going to go today.

8 A. Yes, I do.

9 Q. All right. If you have any questions during
10 this proceeding on how it's going, just let me know
11 and I'll explain, but I'm going to assume you know all
12 the ground rules.

13 A. I think I do. I may have forgotten some of
14 them.

15 Q. Okay.

16 A. But I will ask if I have any doubt.

17 Q. Okay. Well, is there any reason why you
18 can't truthfully and accurately answer questions
19 today?

20 A. No.

21 Q. Okay. And if you don't understand a
22 question, just let me know. If you don't, I'll assume

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