

Case No. IPR2015-01524  
U.S. Patent No. 6,366,130

Attorney Docket No.  
ELBRUS-IPR2

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD.

Petitioner

v.

ELBRUS INTERNATIONAL LIMITED

Patent Owner

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Case: IPR2015-01524

U.S. Patent No. 6,366,130

**NOTICE OF DEPOSITION OF DR. R. JACOB BAKER**

PURSUANT TO 37 C.F.R. § 42.53

Case No. IPR2015-01524  
U.S. Patent No. 6,366,130

Attorney Docket No.  
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Pursuant to 37 C.F.R. §42.53, please take notice that, after agreement of the parties as to scheduling, the Patent Owner Elbrus International Ltd. will take the deposition of Dr. R. Jacob Baker beginning at 9:00 AM on April 1, 2016 at the offices of Hutchison & Steffen, Peccole Professional Park, 10080 West Alta Dr., Suite 200, Las Vegas, NV 89145. The deposition will be conducted before an officer authorized to administer oaths. The deposition will be recorded stenographically.

Set forth in Appendix A is a list of exhibits that may be relied upon during the deposition (copies of which are provided via the PTAB electronic document system).

Set forth in Appendix B is a general description of the scope and nature of the testimony to be elicited.

Dated: March 16, 2016

Respectfully submitted

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## APPENDIX A

| <b>IPR2015-01524</b> |   |
|----------------------|---|
| Identifier           | Description   |
| Exhibit 1001         | U.S. Patent No. 6,366,130 to Podlesny et al.  |
| Exhibit 1002         | Declaration of Dr. R. Jacob Baker   |
| Exhibit 1003         | File History of U.S. Patent No. 6,366,130   |
| Exhibit 1004         | Excerpts from File History of the <i>Inter Partes</i> Reexamination of U.S. Patent No. 6,366,130                                    |
| Exhibit 1005         | U.S. Patent No. 5,828,241 to Sukegawa   |
| Exhibit 1006         | U.S. Patent No. 6,108,254 to Watanabe et al.  |
| Exhibit 1007         | U.S. Patent No. 6,249,469 to Hardee   |
| Exhibit 1008         | "Half-Vdd Bit Line Sensing Scheme in CMOS DRAMs", IEEE Journal of Solid State Circuits, Vol. SC-19, No. 4, August 1984 by Lu et al. |
| Exhibit 1009         | Excerpts from the Modern Dictionary of Electronics (7th ed. 1999).  |
| Exhibit 2002         | Excerpt from <i>DRAM Circuit Design—A Tutorial</i> , Keeth, B. and Baker, R.J.; IEEE Press, 2001 (pp. 26-29).                       |

**APPENDIX B**

**GENERAL DESCRIPTION OF SCOPE AND NATURE OF THE  
TESTIMONY TO BE ELICITED**

The deposition will include questions eliciting testimony regarding the following:

1. The documents reviewed and considered in preparing Exhibit 1002, the witness's Declaration dated June 26, 2015, and exhibits (directly or indirectly cited) thereto.
2. The exhibits (directly or indirectly cited) to the witness's Declaration dated June 26, 2015 including, but not limited to, their creation and content.
3. The facts, statements and opinions, and the basis for each of them, in the witness's Declaration dated June 26, 2015 and exhibits (directly and indirectly cited) thereto, filed in the above-captioned matter.

**CERTIFICATE OF SERVICE**

**IPR 2015-01524**

The undersigned hereby certifies that the foregoing Notice of Deposition was served on March 16, 2016 by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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Dated: March 16, 2016

Respectfully submitted

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