

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MARK CROVELLA, Ph.D.

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

Case IPR2015-01750

Patent 8,484,111 B2

Case IPR2015-01751, Case IPR2015-01752

Patent 7,356,482 B2

- - - - - X

RPX CORPORATION,

Petitioner,

v.

APPLICATIONS IN INTERNET TIME, LLC,

Patent Owner.

- - - - - X

VOLUME I

Pages 1-112

DEPOSITION OF MARK CROVELLA, Ph.D.

Wednesday, May 11, 2016, 8:49 a.m.

Wolf, Greenfield & Sacks, P.C.

600 Atlantic Avenue

Boston, Massachusetts 02210

----- Reporter: Kimberly A. Smith, CRR, RDR -----

Realtime Systems Administrator

DTI Court Reporting

1 MARK CROVELLA, Ph.D.

2 APPEARANCES:

3

4 Wolf, Greenfield & Sacks, P.C.

5 By: Richard F. Giunta, Esq.

6 and Elisabeth H. Hunt, Ph.D., Esq.

7 600 Atlantic Avenue

8 Boston, MA 02210-2206

9 (617) 646-8000

10 rgiunta@wolfgreenfield.com

11 ehunt@wolfgreenfield.com

12 for the Petitioner;

13

14 SoCal IP Law Group LLP

15 By: Jonathan Pearce, Esq.

16 310 North Westlake Boulevard, Suite 120

17 Thousand Oaks, CA 91362

18 (805) 230-1350

19 jpearce@socalip.com

20 for the Patent Owner.

21

22

23

24

25

1 MARK CROVELLA, Ph.D.

2 I N D E X

3

4 WITNESS: Mark Crovella, Ph.D.

5

6 EXAMINATION Page

7 Cross-Examination by Mr. Pearce 4

8 AFTERNOON SESSION

9 Cross-Examination by Mr. Pearce 81

10

11 EXHIBITS FOR IDENTIFICATION:

12 RPX Description Page

13 Exhibit 1001 U.S. Patent 7,356,482 (01751) 50

14 Exhibit 1001 U.S. Patent 8,484,111 (01750) 90

15 Exhibit 1002 Witness's declaration (01751) 9

16 Exhibit 1002 Witness's declaration (01750) 90

17 Exhibit 1003 Witness's CV 4

18 Exhibit 1004 U.S. Patent 6,249,291 62

19 Exhibit 1005 Kovacevic paper 81

20 Exhibit 1006 U.S. Patent 5,806,071 85

21 Exhibit 1010 Krasner and Pope paper 18

22

23

24

25 Original exhibits retained by counsel

1 MARK CROVELLA, Ph.D.

2 MARK CROVELLA, Ph.D.,

3 having been satisfactorily identified by the
4 production of his driver's license, and
5 duly sworn by the court reporter, was deposed
6 and testified as follows:

7 CROSS-EXAMINATION

8 BY MR. PEARCE:

9 Q. Jonathan Pearce on behalf of the patent
10 owner.

11 Can you state and spell your name for
12 the record.

13 A. Mark Crovella, M-a-r-k, C-r-o-v-e-l-l-a.

14 Q. I'd like to show you Exhibit 1003, your CV.
15 Is it generally accurate?

16 A. Yes.

17 Q. Anything in addition to that that's changed
18 in the meantime or . . .

19 A. Let me take a look. I don't believe so.

20 Q. It's been about a year. That's why I'm
21 asking.

22 A. There may be a couple more papers on the
23 paper list. There may be some details here and
24 there, but nothing major.

25 Q. Dr. Crovella, I'm Jonathan Pearce, an

1 MARK CROVELLA, Ph.D.
2 attorney representing patent owner, Applications in
3 Internet Time, LLC. This is a deposition in which
4 I'll ask you questions and you must answer them
5 truthfully.

6 Your attorneys may object to questions
7 that I ask. However, that does not excuse you from
8 providing an answer. You must answer all of my
9 questions unless an attorney directly instructs you
10 not to answer. Although no judge is present, this
11 is a formal legal proceeding just like testifying in
12 court. You're under the same obligation to tell the
13 whole truth and nothing but the truth.

14 If you don't understand any of my
15 questions, feel free to say so and I will rephrase
16 them. Before the deposition can be used in the IPR
17 in this case, you will have an opportunity to read
18 over and correct any mistakes in the transcript.

19 Is all that clear?

20 A. Yes.

21 Q. You already did this, but to ensure the
22 deposition transcript reads clearly, please don't
23 talk while someone else is talking and please do not
24 shake your head "yes" or "no" or respond with
25 answers such as "uh-uh" or "uh-huh" or "nuh-uh."

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.