

1 UNITED STATES PATENT AND TRADEMARK OFFICE  
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD  
3

4 K.J. PRETECH CO., LTD., )  
5 Petitioner, ) Case IPR2015-01866  
6 ) (U.S. 8,215,816)  
7 vs. ) Case IPR2015-01867  
8 ) (U.S. 7,537,370)  
9 INNOVATIVE DISPLAY ) Case IPR2015-01868  
10 TECHNOLOGIES LLC, ) (U.S. 7,434,974)  
11 Patent Owner. )  
12

13 The deposition of THOMAS CREDELLE,  
14 called as a witness for examination, taken  
15 before ANDREA L. KIM, a Certified Shorthand  
16 Reporter of said state, CSR No. 84-3722, at, 71  
17 South Wacker Drive, Chicago, Illinois, on the  
18 2nd day of June, A.D. 2016, at 9:03 a.m.  
19  
20  
21  
22  
23  
24  
25

Page 2

1 PRESENT:  
 2  
 3 MAYER BROWN LLP  
 4 (71 South Wacker Drive,  
 5 Chicago, Illinois 60606-4637,  
 6 312-701-8641), by:  
 7 MR. ROBERT G. PLUTA  
 8 rpluta@mayerbrown  
 9 MS. AMANDA K. STREFF  
 10 astreff@mayerbrown.com  
 11 appeared on behalf of the Petitioner;  
 12  
 13 BRAGALONE CONROY, P.C.  
 14 (Chase Tower,  
 15 2200 Ross Avenue, Suite 4500 W,  
 16 Dallas, Texas 75201-7924  
 17 214.785.6670), by:  
 18 MR. JUSTIN B. KIMBLE  
 19 jkimble@bcpc-law.com  
 20 appeared on behalf the Patent Owner;  
 21  
 22  
 23  
 24 REPORTED BY: ANDREA L. KIM,  
 25 Illinois CSR No. 84-3722.

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1 INDEX  
 2  
 3 WITNESS: PAGE:  
 4 THOMAS CREDELLE  
 5 EXAM by MR. KIMBLE..... 4  
 6 EXAM by MR. PLUTA..... 203  
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 8 \*\*\*\*\*  
 9 INDEX  
 10 EXHIBIT NUMBER MARKED  
 11 Exhibit No. 1 Declaration of Thomas L.  
 12 Credelle Case No. IPR2015-01115..... 44  
 13 Exhibit No. 2 Declaration of Thomas L.  
 14 Credelle Case No. IPR2015-01114.....201  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

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1 (WHEREUPON, the witness was duly  
 2 sworn.)  
 3 THOMAS CREDELLE,  
 4 called as a witness herein, having been first  
 5 duly sworn, was examined and testified as  
 6 follows:  
 7 EXAMINATION  
 8 BY MR. KIMBLE:  
 9 Q. Do you please state your name.  
 10 A. Thomas Credelle.  
 11 Q. And where do you reside?  
 12 A. Brentwood, California.  
 13 Q. And have you been deposed  
 14 before?  
 15 A. Yes.  
 16 Q. How many times?  
 17 A. Twice.  
 18 Q. Can you tell me generally the  
 19 circumstances of those depositions?  
 20 A. One was as a technical  
 21 witness, and the second was as an IPR.  
 22 Q. So let's take the first one,  
 23 the technical witness.  
 24 Were you an expert in that  
 25 matter?

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1 A. I was an inventor in a case, a  
 2 dispute between my previous company and another  
 3 company, and so I was deposed as to the details  
 4 of that invention.  
 5 Q. Can you recall about what year  
 6 that took place?  
 7 A. I probably should know. It's  
 8 probably in my CV. It's so long ago.  
 9 Q. Why don't I hand you a copy of  
 10 your declaration and see if that will help.  
 11 This has been premarked K.J. Pretech 1004 in  
 12 IPR 2015-01868 regarding the '974 patent.  
 13 (WHEREUPON, the document was  
 14 tendered to the witness.)  
 15 BY THE WITNESS:  
 16 A. Let's see if I put that in  
 17 here. 2008.  
 18 BY MR. KIMBLE:  
 19 Q. Can you point me to where you  
 20 find that in your CV?  
 21 A. The first line it says case  
 22 Alien versus Avery, case number 08 --  
 23 Q. What page is that?  
 24 A. I am sorry. Page 5 of the CV.  
 25 I guess it's numbered differently, the

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1 appendix.  
 2 Q. So it's the -- it was the  
 3 Alien versus Avery case?  
 4 A. That's right. It didn't have  
 5 anything to do with intellectual ventures, but  
 6 that was the deposition.  
 7 Q. And you were an inventor in  
 8 that case?  
 9 A. Yes.  
 10 Q. Not an expert, not a retained  
 11 expert?  
 12 A. Not a retained expert.  
 13 Q. And generally what was the  
 14 technology at issue there?  
 15 A. RFID tag packaging.  
 16 Q. Can you tell me basically what  
 17 that means?  
 18 A. Radio frequency ID tag is a  
 19 device that was being developed by Alien  
 20 Technology to replace bar codes. It's widely  
 21 used in many products these days. The patent  
 22 at dispute was a packaging method of how to  
 23 package the antenna and the integrated circuit  
 24 together.  
 25 Q. And you said you were deposed

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1 in another instance in IPR; is that right?  
 2 A. Yes, that was probably not on  
 3 here. It was just two months ago. It was  
 4 Surpass versus Sony.  
 5 Q. And who did you work for in  
 6 that case?  
 7 A. Kenyon & Kenyon.  
 8 Q. Were they representing the  
 9 petitioner or the patent owner?  
 10 A. Representing Sony, the  
 11 petitioner.  
 12 Q. And what technology was at  
 13 issue in that case?  
 14 A. LCD, LCD driving circuits.  
 15 Q. And did you author a  
 16 declaration in that case?  
 17 A. Yes, I did.  
 18 Q. In general did you render  
 19 opinions that the patent at issue was not  
 20 patentable in that matter in which you were  
 21 deposed?  
 22 A. Yes, I did.  
 23 Q. And do you remember if you  
 24 opined that the patent was anticipated by any  
 25 prior art?

Page 8

1 A. I don't recall if it was  
 2 anticipatory or obviousness at this point.  
 3 Q. What did you do to prepare to  
 4 be deposed today?  
 5 A. I reread my declarations and  
 6 the prior art patents and the patents at issue.  
 7 Q. And when did you reread those  
 8 documents?  
 9 A. Over the past two weeks.  
 10 Q. And do you know approximately  
 11 how much time you spent rereading those  
 12 documents?  
 13 A. Probably a few hours, five to  
 14 ten hours perhaps, and then I had a meeting  
 15 with attorneys here to prepare for the  
 16 deposition.  
 17 Q. When did you have that  
 18 meeting?  
 19 A. Yesterday and the day before.  
 20 Q. Approximately how long did you  
 21 spend preparing for the deposition with the  
 22 attorneys here?  
 23 A. About 12 to 13 hours.  
 24 Q. What attorneys were present  
 25 during those --

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1 A. Saqib Siddiqu and I met  
 2 briefly with Rob. That was only a few minutes  
 3 last night.  
 4 Q. Did you speak with anybody  
 5 else other than attorneys with Mayer Brown to  
 6 prepare for the deposition?  
 7 A. No.  
 8 Q. If you would pull back out  
 9 your report, and let's focus on the CV.  
 10 A. Okay.  
 11 Q. Talk to you about some of the  
 12 things. Let's turn to page 4, and the entry  
 13 your job with RCA Sarnoff Labs. It says you  
 14 were a key contributor to novel methods of  
 15 large screen flat panel TFT, right?  
 16 A. Correct.  
 17 Q. And that's thin film  
 18 transistor?  
 19 A. Yes.  
 20 Q. Can you tell me generally what  
 21 types of products you worked on at RCA?  
 22 A. I wouldn't call them products  
 23 but concepts.  
 24 Q. Okay. What kind of concepts?  
 25 A. We worked on a variety of flat

Page 10	<p>1 panel technologies that could be used by RCA in                  2 the future to build a hang on the wall                  3 television. We looked at flat CRTs, cathode                  4 ray tubes, that were thin but used a lot of the                  5 technology that RCA had at hand, and we looked                  6 at thin film transistor driven active matrix                  7 LCDs.                  8 We did examine plasma briefly                  9 but rejected that concept. So my own                  10 involvement with flat panel displays at RCA was                  11 to be an inventor and developer of various                  12 techniques in the flat CRT area as well as in                  13 the thin film transistor area.                  14 Q. With respect to the flat CRTs,                  15 were you ever involved in building prototypes?                  16 A. Yes, small prototypes.                  17 Q. Approximately what size?                  18 A. Five by ten inches.                  19 Q. Were those edge-lit CRTs or                  20 direct backlit CRTs?                  21 MR. PLUTA: Object to form.                  22 BY THE WITNESS:                  23 A. These devices were neither.                  24 They were a beam guided technique where                  25 electrons would be injected from the edge of a</p>	Page 12
Page 11	<p>1 tube and be transmitted to the screen. So it                  2 could be considered an edge-lit CRT as opposed                  3 to an electron source behind the phosphorus                  4 screen.                  5 BY MR. KIMBLE:                  6 Q. You talked about TFT active                  7 matrix LCDs.                  8 What does active matrix mean?                  9 A. To me an active matrix is an                  10 array of transistors that drive the pixels.                  11 Q. Were you involved in building                  12 any prototypes of those display products?                  13 A. My research and my team's                  14 research was involved in developing the CRT                  15 technology, and we did build small on the order                  16 by two inch by two inch sized prototypes.                  17 Q. Were you -- did those products                  18 use backlighting units?                  19 A. There was no effort on                  20 backlighting. We just used light sources                  21 because these were R&amp;D prototypes.                  22 Q. What type of light sources did                  23 you use?                  24 A. I don't recall. Whatever was                  25 available.</p>	Page 13

Page 14

1 efforts were aimed at that as an initial  
 2 product, but in the future other applications  
 3 such as monitors and TVs was in our scope.  
 4 Q. During your time with GE, were  
 5 you involved in building prototypes of these  
 6 display products?  
 7 A. Prototypes for avionics, yes.  
 8 Q. Do you recall approximately  
 9 the size of those prototypes?  
 10 A. 5.25 inches by 5.25 inches.  
 11 Q. Was there conceptual work done  
 12 on larger display products?  
 13 A. Not really.  
 14 Q. You said that monitors and TVs  
 15 were -- I don't want to put words in your  
 16 mouth.  
 17 A. A future product.  
 18 Q. Was there thought given to the  
 19 size of those products or what they would be?  
 20 A. Not specifically.  
 21 Q. Did the avionic prototypes  
 22 utilize backlighting units?  
 23 A. Yes.  
 24 Q. What type of backlighting  
 25 units?

Page 15

1 A. Either CCFL or hot cathode  
 2 fluorescent.  
 3 Q. So CCFL utilizes one or more  
 4 bulbs, right?  
 5 A. Correct.  
 6 Q. Were these either direct  
 7 back-lit or edged lit?  
 8 A. They would be considered a  
 9 direct backlight.  
 10 Q. Do they use multiple bulbs?  
 11 A. Yes.  
 12 Q. For the hot cathode  
 13 fluorescent products, were those direct  
 14 back-lit?  
 15 A. Yes.  
 16 Q. And did they use multiple  
 17 bulbs?  
 18 A. Yes.  
 19 Q. During your time with GE, did  
 20 you do any work with LEDs as a light source?  
 21 A. No.  
 22 Q. Was there any conceptual work  
 23 done or thought given to using LEDs?  
 24 A. The technology didn't really  
 25 exist to be practical for this application. So

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1 no consideration was given to LEDs.  
 2 Q. Why do you say the technology  
 3 didn't exist?  
 4 A. The avionic display has to be  
 5 a very bright display to be visible in sunlight  
 6 to a pilot in an open canopy. So the amount of  
 7 lumens or light output that is required by a  
 8 backlight could not be achieved by any known  
 9 LEDs at the time.  
 10 Q. What level of brightness in  
 11 terms of lumens would have been required?  
 12 MR. PLUTA: Object to form.  
 13 BY THE WITNESS:  
 14 A. Let me put it in terms of the  
 15 output brightness. The output brightness of  
 16 the screen would need to be on the order of  
 17 1,000 candelas per square meter.  
 18 BY MR. KIMBLE:  
 19 Q. Okay. Now, I want to move to  
 20 the position you held after that which is -- as  
 21 I understand from your CV, was with Apple  
 22 Computer; is that right?  
 23 A. That's correct.  
 24 Q. That was from approximately  
 25 1991 to 1994?

Page 17

1 A. Yes.  
 2 Q. And you were responsible for  
 3 LCD engineering for the first Powerbook; is  
 4 that right?  
 5 A. That's correct.  
 6 Q. Did Apple sell that Powerbook  
 7 during your time with Apple?  
 8 A. Yes.  
 9 Q. And did that Powerbook utilize  
 10 a backlighting unit?  
 11 A. Yes.  
 12 Q. Okay. Was it just one type of  
 13 backlighting unit or multiple types?  
 14 MR. PLUTA: Object to form.  
 15 BY THE WITNESS:  
 16 A. The products during the time I  
 17 was at Apple used a CCFL backlight.  
 18 BY MR. KIMBLE:  
 19 Q. Were they direct back-lit or  
 20 edge-lit?  
 21 A. Edge-lit.  
 22 Q. Did those edge-lit CCFL  
 23 backlighting units utilize light guides?  
 24 A. Yes.  
 25 Q. And did they utilize one or

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