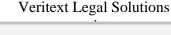
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Page 1
          UNITED STATES PATENT AND TRADEMARK OFFICE
 1
          BEFORE THE PATENT TRIAL AND APPEAL BOARD
 2
     K.J. PRETECH CO., LTD.,
 3
                                  )Case IPR2015-01866
          Petitioner,
                                  ) (U.S. 8,215,816)
 4
                                  )Case IPR2015-01867
     vs.
 5
                                  ) (U.S. 7,537,370)
     INNOVATIVE DISPLAY
                                  )Case IPR2015-01868
                                  ) (U.S. 7,434,974)
 6
     TECHNOLOGIES L.L.C.,
 7
          Patent Owner.
 8
                 ORAL DEPOSITION OF KENNETH WERNER
 9
                        September 21, 2016
10
                             Volume 1
11
12
     ORAL DEPOSITION OF KENNETH WERNER, produced as a
13
     witness and duly sworn, was taken in the above-styled
     and numbered cause on September 21, 2016, from 9:04
14
15
     a.m. until 3:47 p.m., before Suzanne Kelly, CSR No.
16
     1260, in and for the State of Texas, reported by
17
     stenographic method, at the Law Offices of Bragalone
18
     Conroy, P.C., located at Chase Tower, 2200 Ross
19
     Avenue, 4500 W, Dallas, Texas, pursuant to Federal
     Rules of Civil Procedure and the provisions stated on
20
21
     the record, if any.
22
23
24
25
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Page 2
1
                            APPEARANCES
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4	Appearances 2
5	KENNETH WERNER
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8	Reporter's Certificate 160
9	EXHIBITS
10	NO. DESCRIPTION PAGE
11	Exhibit 1001 A copy of a United 14
	States patent
12	
	Exhibit 1006 A copy of a 38-page 35
13	document entitled,
	"Certification of
14	Translation"
15	Exhibit 1007 A copy of a 36-page 114, 143, 144
	document entitled,
16	"Utility Model
17	Publication"
1 /	Exhibit 1008 A copy of a United 106
18	States Patent
19	Exhibit 1009 A copy of a 26-page 115, 156
10	Japanese language
20	document
21	Exhibit 2006 A copy of a 40-page 8, 14
	document entitled,
22	"Declaration of
	Kenneth Werner"
23	
24	
25	



	Page 4
1	PROCEEDINGS
2	THE COURT REPORTER: If you would
3	raise your right hand, I'll administer the
4	witness' oath to you.
5	(Oath administered.)
6	KENNETH WERNER,
7	having sworn to testify the truth, the whole
8	truth, and nothing but the truth testifies upon
9	his oath as follows:
10	EXAMINATION
11	BY MS. STREFF:
12	Q. Mr. Werner, can you state your full name
13	and address for the record, please?
14	A. Kenneth Werner, 2 Shadybrook Lane,
15	Norwalk, Connecticut 06854.
16	Q. Mr. Werner, I represent P.J. Pretech in
17	the case and I will be asking you a number of
18	questions today. I know you've been deposed a
19	number of times, but I'll just go over a couple
20	of things before we get started.
21	So first, I'll ask that you give
22	oral responses rather than gestures so the Court
23	Reporter can take down your answers. Do you
24	understand that?
25	A. I do.



	Page 5
1	Q. And if you answer a question that I ask,
2	I'll assume you understood the question as asked.
3	Is that fair?
4	A. That's fair.
5	Q. And if you need to take a break at any
6	point, just let me know. All I ask is that if
7	there's a question pending, you answer that
8	question first, and then we can take a break.
9	Okay?
L O	A. Okay.
L 1	Q. And you have taken an oath that binds
L 2	you to give truthful testimony today. Do you
L 3	understand that?
L 4	A. Yes.
L 5	Q. And is there any reason you cannot give
L 6	truthful testimony?
L 7	A. No.
L 8	Q. I would like to begin with your
L 9	preparation for today's deposition.
20	A. Uh-huh.
21	Q. Did you meet with anyone to prepare for
22	your deposition?
23	A. Yes.
24	Q. Who did you meet with?
25	A. Justin vesterdav.



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