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BEFORE THE PATENT TRIAL AND APPEAL BOARD

- - - - -x

LG ELECTRONICS, INC.; LG :  
ELECTRONICS USA, INC.; LG :  
ELECTRONICS MOBILECOMM USA, INC. : Case No.  
vs. : IPR2015-01984  
CORE WIRELESS : Patent No.  
- - - - -x 8,434,020

LG ELECTRONICS, INC.; LG :  
ELECTRONICS USA, INC.; LG :  
ELECTRONICS MOBILECOMMUSA, INC. : Case No.  
vs. : IPR2015-01985  
CORE WIRELESS : Patent No.  
- - - - -x 8,713,476

Washington, D.C.

Wednesday, September 7, 2016

Deposition of:

SCOTT DENNING

Called for oral examination by counsel for LG  
Electronics, pursuant to notice, at the law  
offices of Greenberg Trauig, 1750 Tysons  
Boulevard, Suite 1000, McLean, Virginia, before  
Denise M. Brunet, RPR, a Notary Public in and for  
the Commonwealth of Virginia, beginning at  
9:58 a.m., when were present on behalf of the  
respective parties:

1 of executing multiple applications simultaneously,  
2 typically. In a monolithic software architecture,  
3 there is only one program running ever.

4 Q I believe you said in Blanchard there are  
5 functions for contacts, dialing a phone and text  
6 messages; is that accurate?

7 A I believe that's what I said.

8 Q And do you believe it's accurate that a  
9 person of ordinary skill in the art would  
10 understand that the phone in Blanchard had  
11 functions for dialing the phone, sending text  
12 messages and displaying contacts?

13 MR. HELGE: Object to form.

14 THE WITNESS: Well, Blanchard itself  
15 never goes into details of exactly what is  
16 implemented where. You can just kind of look at  
17 the figures and determine some of the things that  
18 he had in mind that would be implemented with this  
19 invention.

20 BY MR. BROWN:

21 Q Well, if you look at figure 3, for  
22 example -- actually, let's back up. Let's start

1 with figure 2. Figure 2 shows a phone, correct?

2 A Yes.

3 Q And using the phone shown in figure 2, a  
4 person of ordinary skill in the art would  
5 understand that you could call a phone number.

6 A Yes.

7 Q And you could receive a phone call,  
8 correct?

9 A Yes.

10 Q So those would be functions available  
11 within the phone in Blanchard?

12 MR. HELGE: Object to form.

13 THE WITNESS: That is correct.

14 BY MR. BROWN:

15 Q To address your counsel's objection, is  
16 it correct that dialing a phone number is a  
17 function available within the phone in Blanchard?

18 MR. HELGE: Object to form.

19 THE WITNESS: Yes.

20 BY MR. BROWN:

21 Q And if you look at figure 3, there's a  
22 series of screens, and one of them is marked 320.

1 that particular feature.

2 Q Didn't you describe that as a  
3 subroutine --

4 A As I said before --

5 Q -- in your declaration?

6 A -- I'm not willing to say that every  
7 single menu item has an associated subroutine.

8 Q But you're willing to say that some of  
9 them do?

10 A Certainly some of them do.

11 Q And you are willing to say that every  
12 menu item has some code that is called when the  
13 item is selected?

14 A Yes.

15 Q Okay. Can you explain the distinction,  
16 then, between having some code that is called and  
17 having a subroutine?

18 A Well, a subroutine is a very specific  
19 type of code that would be called. Blanchard  
20 doesn't really speak about that. And Blanchard is  
21 intentionally silent about the software  
22 architecture altogether.

1 example of what is done with the '020 patent.

2 Q Prior to the filing of the '020 patent,  
3 were both of those options known to a person of  
4 ordinary skill in the art for use in a mobile  
5 telephone?

6 MR. HELGE: Object to form.

7 THE WITNESS: Yes.

8 BY MR. BROWN:

9 Q Can you explain -- well, is it correct  
10 that, in your opinion, one of those options might  
11 satisfy the claims of the '020 and '476 patents,  
12 but the other one would not?

13 MR. HELGE: Object to form.

14 THE WITNESS: Again, is there a part of  
15 my declaration that you're referring to?

16 BY MR. BROWN:

17 Q Probably many parts. Let's go to  
18 paragraph 53 on page 28. You say there, "As I  
19 have explained above, Blanchard fails to disclose  
20 any application...."

21 Do you see that?

22 A Yes.

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