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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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