

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 -----

3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4 -----

5 ARISTA NETWORKS, INC.  
6 Petitioner

7 v.

8 CISCO SYSTEMS, INC.  
9 Patent Owner

10 -----

11 Case IPR2016-00309  
12 Patent 7,224,668

13 -----

14  
15 DEPOSITION OF DR. BILL LIN

16  
17 Monday, August 23, 2016, 10:05 a.m.

18  
19 12390 El Camino Real, 3rd Floor

20 San Diego, California

21  
22  
23 Reported by:

24 Harry Alan Palter

25 CSR No. 7708, Certified LiveNote Reporter

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2 DR. BILL LIN

3 Arista Networks, Inc. Vs. Cisco Systems, Inc.

4 Monday, August 23, 2016

5 Harry Alan Palter, CSR No. 7708

6

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1 San Diego, California  
2 Monday, August 23, 2016; 10:05 a.m.  
3  
4  
5 DR. BILL LIN,  
6 having been duly administered an oath in accordance  
7 with Code of Civil Procedure Section 2094, was  
8 examined and testified as follows:  
9  
10  
11 EXAMINATION  
12 BY MS. GORDON:  
13 Q Good morning. Could you please state  
14 your full name for the record.  
15 A Bill Lin.  
16 Q Thank you. And Dr. Lin, you understand  
17 that you are here today regarding the testimony you  
18 submitted by Declaration in December of 2015 in the  
19 United States Patent and Trademark Office in a party  
20 review of U.S. patent No. 7,224,668?  
21 A Yes.  
22 Q And for purposes of today's deposition,  
23 is it okay if we refer to that patent as the "'668  
24 patent"?  
25 A Yes.

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1 Q Thank you.  
2 And I know we've been sitting across the  
3 table from each other several times, so I know this  
4 is not your first deposition. But just to remind  
5 you of some ground rules: If you need a break at  
6 any time during this deposition, just let your  
7 attorneys know. When we finish the question, we can  
8 certainly take a break for you.  
9 Is there any reason you cannot give  
10 truthful and complete testimony today?  
11 A No.  
12 Q So, Dr. Lin, the Declaration you  
13 submitted in December of 2015 was not the first  
14 Declaration you did on the '668 patent; is that  
15 correct?  
16 A Correct.  
17 Q How many other Declarations did you do on  
18 the '668 patent?  
19 A Two other ones.  
20 Q Okay. And do you know what the results  
21 of the proceedings related to those two cases were?  
22 A I read the board institution decision, so  
23 I guess they were not instituted.  
24 Q Okay. And did you read the board  
25 institution decisions before you prepared the

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1 Declaration for the present proceeding?  
2 A No.  
3 Q Okay. And you didn't read either of the  
4 institution decisions before you prepared the  
5 Declarations for the present proceeding?  
6 A I didn't read any institution decisions  
7 before I prepared the Declaration.  
8 Q Okay. And when did you read the  
9 institution decisions for those other two cases?  
10 A I don't think I've ever read those. But  
11 for this one, I read it, maybe, a couple weeks ago.  
12 Q Okay.  
13 A For the third one only.  
14 Q Okay. And that was in preparation for  
15 today's deposition?  
16 A Yes.  
17 Q And you read only the institution  
18 decision for the third proceeding; is that correct?  
19 A Correct.  
20 Q Okay. So you haven't read the  
21 institution decisions for the first two?  
22 A I have not.  
23 Q Okay. But do you understand that those  
24 proceedings were not instituted?  
25 A That's my understanding.

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1 Q Okay. And was that understanding  
2 provided to you by your attorneys -- or the  
3 attorney, I should say?  
4 A I'm not sure. I'm not sure. But I  
5 gathered from reading the institution decision for  
6 the third one, the first two were not instituted.  
7 Q Okay. Thank you.  
8 I'll just start by just asking you some  
9 terminology questions so we're on the same page for  
10 today's deposition.  
11 Dr. Lin, what is a port?  
12 A I think, generally, a port is simply  
13 something that data passes through.  
14 Q Okay. And would that definition change  
15 if I asked you: What is a port on a router?  
16 A I don't -- I don't think so, but I would  
17 have to look at specific instance.  
18 Q Okay. Do you understand what a rout -- a  
19 port on a router is, generally?  
20 A Yes.  
21 Q Okay. And how would you define a router  
22 port, generally?  
23 A Again, a port is -- to me, can be defined  
24 as something that data passes through.  
25 Q Okay. So a port on a router would be the

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1 same as a port on a switch?  
2 A Yes.  
3 Q Okay. And how many ports does a typical  
4 router have today?  
5 A I -- I think it varies substantially.  
6 Q Okay. So what's the lowest number you've  
7 seen for a router?  
8 A I mean, two?  
9 Q Two?  
10 And what is the most you've seen a router  
11 have today?  
12 A Oh, I think they're in the thousands.  
13 Q Okay. And what's the average?  
14 A I don't think there's such a thing.  
15 Q Okay. And why is there not such a thing?  
16 A Well, I -- I don't know -- I don't know  
17 what the average is.  
18 Q Okay. And what would the number of ports  
19 a router have depend on?  
20 A What do you mean?  
21 Q Like, how would you determine how many  
22 ports you would need in a router?  
23 A Well --  
24 MR. PHILLIPS: Objection. Scope.  
25 Incomplete hypothetical.

Page 11

1 THE WITNESS: Are you talking about  
2 external ports?  
3 BY MS. GORDON:  
4 Q The ports to the router. They're  
5 receiving data from --  
6 A You mean, external to the router?  
7 Q Correct.  
8 MR. PHILLIPS: Same objections.  
9 THE WITNESS: What is your question  
10 again?  
11 BY MS. GORDON:  
12 Q So my question is: How would a person  
13 determine how many external ports they would need  
14 for a router?  
15 MR. PHILLIPS: Same objection.  
16 THE WITNESS: I don't understand the  
17 question.  
18 BY MS. GORDON:  
19 Q Okay. So you're designing a  
20 communication system, and you need routers. You  
21 understand that?  
22 A Yes.  
23 Q Okay. And you need to decide how many  
24 ports to use for a router or -- or which router and  
25 how many ports that router has -- correct?

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1 MR. PHILLIPS: Objection. Scope.  
2 Compound.  
3 THE WITNESS: Well, I mean, when a  
4 company sells a router, the router that's -- that  
5 the company is selling has a particular number of  
6 external ports.  
7 BY MS. GORDON:  
8 Q Okay. And so if you're designing a  
9 communications system, how would you decide what  
10 router to buy, based on the number of ports?  
11 A If I were a buyer of a router --  
12 Q Right.  
13 A -- I would buy the one with the number of  
14 external ports that I need to connect to other  
15 things.  
16 Q Okay. And so -- so you're looking at the  
17 number of ports you need to connect to other things.  
18 So what factors would go into the number  
19 of ports you would need for a router if you were  
20 designing a system?  
21 MR. PHILLIPS: Objection. Scope.  
22 Incomplete hypothetical.  
23 THE WITNESS: I think it just depends on  
24 what the -- what's the buyer -- what the buyer  
25 wants.

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1 BY MS. GORDON:  
2 Q Okay. And does a port need to be a  
3 physical connection?  
4 A No.  
5 Q Okay. And why not?  
6 A The -- the word "port" in the context of  
7 networking has been used fairly broadly.  
8 Q And in what other ways, then, does it  
9 need to be a physical connection?  
10 A It can, for example, be a logical  
11 connection.  
12 Q And what do you mean by a logical  
13 connection?  
14 A I think a port can be broadly defined as  
15 something that data passes through. And a logical  
16 port could be some logical entity where data passes  
17 through.  
18 Q Okay. And you've heard of the term  
19 "switch"; correct?  
20 A Yes.  
21 Q And do switches have ports?  
22 A Yes.  
23 Q Okay. And can you connect switches to  
24 routers?  
25 A Yes.

Page 14

1 Q So how would a person decide the  
2 distribution of ports between switches and routers?  
3 MR. PHILLIPS: Objection. Scope.  
4 Incomplete hypothetical.  
5 THE WITNESS: I don't understand the  
6 question.  
7 BY MS. GORDON:  
8 Q So how would a person decide how many  
9 ports they would need to interface between a switch  
10 and a router?  
11 MR. PHILLIPS: Same objections.  
12 THE WITNESS: Again, I'm not sure I  
13 understand the question. I'm not -- I'm not a  
14 buyer, per se, so, I mean, I think a buyer would  
15 just buy one with as many external ports that he or  
16 she feels is appropriate for their application.  
17 BY MS. GORDON:  
18 Q Okay. And what types of applications  
19 would you use a router for?  
20 A There's a very wide range.  
21 Q Can you name some of those applications?  
22 A So my house, I have a home router.  
23 Q Okay.  
24 A And I bought one with four external  
25 ports. And no particular reason. Just in case I

Page 15

1 need it.  
2 Q Okay. And what if you were a network  
3 service provider --  
4 A Okay.  
5 Q -- how would you determine how many ports  
6 you would want on your individual routers?  
7 MR. PHILLIPS: Objection. Scope.  
8 Incomplete hypothetical.  
9 THE WITNESS: Again, I -- it -- you know,  
10 the -- the network service provider may buy switches  
11 and routers with different number of external ports.  
12 It's up to them.  
13 BY MS. GORDON:  
14 Q You mentioned earlier that you were aware  
15 of routers with a thousand ports; correct?  
16 A There can be, yes.  
17 Q And in what applications are those  
18 routers used?  
19 A For example, with network providers.  
20 Q And what network providers would use a  
21 router with a thousand ports?  
22 MR. PHILLIPS: Objection. Scope.  
23 THE WITNESS: The -- for example, people  
24 in the -- people providing Internet service.  
25 BY MS. GORDON:

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1 Q Okay. And what specific routers are you  
2 referring to that have thousands of ports?  
3 A I'm not referring to --  
4 MR. PHILLIPS: Objection. Scope.  
5 THE WITNESS: -- any specific one.  
6 BY MS. GORDON:  
7 Q So you don't know of any particular  
8 vendors that offer a router with thousands of ports?  
9 A Not on top of my head.  
10 Q Okay. Have you ever personally seen a  
11 router with thousands of ports?  
12 A I have not. But I have written papers  
13 about routers with thousands of ports.  
14 Q Was that about the theoretical ability  
15 for a router to have thousands of ports?  
16 A They're not theoretical.  
17 Q Okay. So you were aware of actual  
18 products that had thousands of ports?  
19 A I cannot -- I do not know, right now,  
20 sitting here, on top of my head what routers would  
21 have thousands of ports.  
22 Q Okay. And are you familiar with a router  
23 with multiple linecards?  
24 A Yes.  
25 Q And did the system with a thousand ports

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1 use multiple linecards?  
2 MR. PHILLIPS: Objection. Mis --  
3 THE WITNESS: Possibly.  
4 THE REPORTER: Keep your voice up,  
5 Mr. Phillips, please.  
6 MR. PHILLIPS: Will do, sir.  
7 BY MS. GORDON:  
8 Q You said, "possibly." Why did you say,  
9 "possibly"?  
10 A I don't understand the question.  
11 I've already explained that I understand  
12 that there are routers with -- with many ports. And  
13 there are routers with linecards.  
14 Q Right. And I asked -- you said there was  
15 a system with a thousand ports. And I asked you  
16 whether that system with a thousand ports used  
17 multiple linecards. And you answered, "Possibly."  
18 And I was wondering why you said, "Possibly" instead  
19 of answering "yes" or "no."  
20 A Because the design of switches and  
21 routers is an evolving art.  
22 Q Okay.  
23 A So I -- I -- my -- I have the  
24 understanding that there are routers that use  
25 linecards.

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