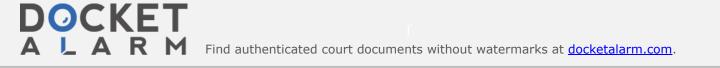
Samsung Petitioners' Submission in Response to Proposed Supplemental Information from Patent Owner Pursuant to Motion filed Under 37 C.F.R. § 42.123(b).



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1	UNITED STATES DISTRICT	
2	NORTHERN DISTRICT OF CALIFORNIA	
3	SAN FRANCISCO DIVISION	
4		
5	EVOLVED WIRELESS, LLC,)
6	Plaintiff,)
7	vs.	/) Case No.) C.A. 15-545-SLR-SRF
8	SAMSUNG ELECTRONICS CO. LTD., and SAMSUNG ELECTRONICS AMERICA, INC.,)
10	Defendants.)
11)
12		
13		
14	CONFIDENTIAL OUTSIDE ATTORNEYS' EYES ONLY	
15	SOURCE CODE	
16		
17		
18	VIDEO DEPOSITION OF JOHN DAVID VILLASENOR,	
19	taken on behalf of STRAIGHT PATH IP GROUP, INC., at	
20	QUINN EMANUEL URQUHART & SULLIVAN, LLP, 555 Twin	
21	Dolphin Drive, Suite 560, Redwood Shores,	
22	California, beginning at 9:02 A.M., Friday,	
23	August 25, 2017, before QUYEN N. DO, Certified	
24	Shorthand Reporter No. 12447.	
25		
24	-	

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1	A I'm sorry. Which page?	
2	Q You page 7, I believe, is the summary	
3	of your opinions.	
4	A Oh, I see.	
5	Q If you want to refer to that or the table	
6	of contents, whatever you want to refer to, to	
7	answer these questions. I was just trying to give	
8	you a road map.	
9	A That's correct. I haven't I have not	
10	opined on the noninfringing alternatives.	
11	Q Okay. And I think we testified earlier	
12	you're not offering opinions on invalidity, right?	
13	A Correct.	
14	Q And you're not offering opinions as to the	
15	benefits of LTE, correct?	
16	A I have not offered those opinions.	
17	Q And you're not offering opinions in	
18	rebuttal to Dr. Cooklev's opinions as to the	
19	correlation between the LTE benefits and the	
20	asserted patents, right?	
21	A I don't believe I've addressed that.	
22	MR. SCHULTZ: Okay. We've been going	
23	about an hour. Why don't we take a short break?	
24	THE VIDEOGRAPHER: Going off the record at	
25	10:02 a.m.	

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1	I have addressed.	
2	Q The first transmitting element is the one	
3	that you opine as a basis of noninfringement, right?	
4	A I focus my my discussion on that, but	
5	that element, of course, relates to several of the	
6	prior elements.	
7	Q Are you opining that the accused Samsung	
8	products do not determine whether there is data	
9	stored in the Msg3 buffer when the uplink grant	
10	signal is on the specific message?	
11	A I'm not sure I understand the question.	
12	Q I'm just asking, are you opining that this	
13	determination step does not occur in the Samsung	
14	accused products?	
15	A I'd have to look at exactly what I said.	
16	I I framed my response in light of the first	
17	transmitting element. But, again, there are	
18	there are implications in that element relating to	
19	some of the other elements.	
20	Q Okay. And what about the second	
21	determination step in Claim 1; are you opining that	
22	the accused Samsung products do not infringe,	
23	because they do not perform that determination step?	
24	A Same answer.	
25	Q What about the last, transmitting new data	

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1	limitation; do you opine that the accused Samsung
2	products do not perform that transmission of new
3	data?
4	A I don't believe I addressed the that
5	"transmitting new data" claim element in my report.
6	Q Now, you do not offer any opinions that
7	the accused Samsung products do not infringe
8	dependent Claims 2 through 6 for independent reasons
9	beyond the one you provided for Claim 1, right?
10	A That's correct. In in other words,
11	just to make sure there's no misunderstanding, I
12	believe those claims are not infringed. But but
13	the reason that I've expressed is that the
14	independent claim does not infringe, and so, of
15	course, that means the associated dependent claims
16	cannot be infringed.
17	Q Right. But you don't have any independent
18	opinions of noninfringement on any of the dependent
19	claims, right?
20	A It's confusing to use the word
21	"independent" in that question.
22	Q Okay.
23	A So I I don't have any distinct opinions
24	that apply only to any of the dependent claims.
25	Q Okay. All right. And the same would be

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