

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,)
) Case No.
Petitioner,) IPR2016-01020
) -and-
vs.) Case No.
) IPR2016-01021
TQ DELTA, LLC,)
) U.S. Patent No.
Patent Owner.) 9,014,243

The deposition of ROBERT T. SHORT,
Ph.D., called as a witness for examination, taken
before VICTORIA C. CHRISTIANSEN, a Certified
Shorthand Reporter of the State of Illinois, CSR
No. 84-3192, at Suite 3500, 500 West Madison
Street, Chicago, Illinois, on the 27th day of
April, A.D. 2017, at 9:17 a.m.



800.211.DEPO (3376)
EsquireSolutions.com

1 PRESENT:

2 HAYNES AND BOONE, LLP,
3 (2323 Victory Avenue, Suite 700,
4 Dallas, Texas 75219,
5 214-651-5533), by:
6 MR. JOHN RUSSELL EMERSON,
7 russ.emerson@haynesboone.com,

8 -and-

9 HAYNES AND BOONE, LLP,
10 (2505 North Plano Road, Suite 4000,
11 Richardson, Texas 75082-4101,
12 972-739-8649), by:
13 MR. THEODORE M. FOSTER,
14 theo.foster@haynesboone.com,

15 -and-

16 HAYNES AND BOONE, LLP,
17 (30 Rockefeller Plaza, 26th Floor,
18 New York, New York 10112,
19 212-659-7300), by:
20 MS. DINA BLIKSHTEYN,
21 dina.blikshTEYN@haynesboone.com,

22 appeared on behalf of the Petitioner;

23 DUANE MORRIS LLP,
24 (1075 Peachtree Street NE, Suite 2000,
Atlanta, Georgia 30309-3929,
404-253-6917), by:
MR. COREY J. MANLEY,
cjmanley@duanemorris.com,

appeared on behalf of Arris, Comcast,
Cox, Verizon and Time Warner;



800.211.DEPO (3376)
EsquireSolutions.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

PRESENT (Continued):

COOLEY LLP,
(Reston Town Center,
11951 Freedom Drive, 14th Floor,
Reston, Virginia 20190-5656,
703-456-8130), by:
MR. STEPHEN McBRIDE,
smcbride@cooley.com,

appeared via telephonic communications
on behalf of Dish Network;

McANDREWS, HELD & MALLOY, LTD.,
(500 West Madison Street, 34th Floor,
Chicago, Illinois 60661,
312-775-8000), by:
MR. PETER J. McANDREWS,
pmcandrews@mcandrews-ip.com, and
MR. ANDREW B. KARP,
akarp@mcandrews-ip.com,

appeared on behalf of the Patent Owner.

ALSO PRESENT:

MR. JOSE TELLADO
(via telephonic communications).

REPORTED BY: VICTORIA C. CHRISTIANSEN, RPR, CRR,
Illinois CSR No. 84-3192.



800.211.DEPO (3376)
EsquireSolutions.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

(WHEREUPON, the witness was duly sworn.)

MR. EMERSON: Russ Emerson, Haynes and Boone, for Cisco.

MR. FOSTER: Theo Foster from Haynes and Boone for Cisco.

MS. BLIKSHTEYN: Dina Blikshteyn, Haynes and Boone, for Cisco.

MR. MANLEY: Corey Manley, Duane Morris, for Arris, Comcast, Cox, Time Warner Cable and Verizon.

MR. McANDREWS: Peter McAndrews --

MR. McBRIDE: Stephen McBride from Cooley on behalf of Dish Network.

MR. McANDREWS: Anyone else on the phone for the defendants or petitioner?

MR. FOSTER: Petitioner expects to have Jose Tellado, but apparently he's not on the phone just yet.

MR. McANDREWS: Okay, all right. So --

MR. TELLADO: Jose Tellado of Cisco is here.

MR. FOSTER: Okay.

MR. McANDREWS: That's Jose Tellado.

Peter McAndrews from McAndrews, Held & Malloy for TQ Delta.



800.211.DEPO (3376)
EsquireSolutions.com

1 MR. KARP: Andrew Karp, McAndrews, Held &
2 Malloy, for TQ Delta.

3 ROBERT T. SHORT, Ph.D.,
4 called as a witness herein, having been first duly
5 sworn, was examined and testified as follows:

6 EXAMINATION

7 BY MR. EMERSON:

8 Q. All right. Good morning, Dr. Short.
9 How are you?

10 A. Good. Thank you.

11 Q. Are you prepared to testify today?

12 A. I am.

13 Q. Any reason why you can't testify
14 truthfully and accurately today?

15 A. No.

16 Q. Okay. How many times have you been
17 deposed?

18 A. Four, I believe.

19 Q. Okay. And when was the last time you
20 were deposed?

21 A. In February.

22 Q. In what connection were you deposed?

23 A. It was an infringement suit, and I was
24 with the plaintiff.



800.211.DEPO (3376)
EsquireSolutions.com

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.