```
Page 1
 1
             UNITED STATES PATENT AND TRADEMARK OFFICE
 2
             BEFORE THE PATENT TRIAL AND APPEAL BOARD
 3
 4
       APPLE INC.
 5
                     Petitioner, )
 6
                     V.
                          ) CASE NO.: IPR2016-01198
 7
       VOIP-PAL.COM, INC. ) Patent 9,179,005
 8
                   Patent Owner. )
 9
10
11
12
           The discovery deposition of CLAY PERREAULT, taken
13
    in the above-entitled cause, before Alyssa Fontaine,
14
    official reporter, on the 12th of April, 2017, 1055 W
15
16
    Georgia St, Vancouver, BC V6C 2L1
17
18
19
20
21
22
23
24
25
```



```
Page 2
     APPEARANCES:
              ERISE IP
              5600 Greenwood Plaza Blvd.
 3
              Suite 200
              Greenwood Village, CO 80111
 5
             (720) 689-5441
 6
 7
              BY: MR. PAUL HART
                     On behalf of the Petitioner;
 8
              KNOBBE, MARTENS, OLSEN & BEAR, LLP
 9
              2040 Main Street, 14th Floor
10
              Irvine, CA 92614
11
              (858) 707-4000
12
              BY: MR. KERRY TAYLOR (by phone)
13
                   On behalf of the Patent Owner.
14
15
16
     ALSO PRESENT:
17
              David Gileff
18
             Adam Seitz (by phone)
19
20
21
22
23
24
25
```



CEATTERREAUET 4/12/2017			
1		INDEV	Page 3
1		INDEX	
2			
3	INDEX OF EXAMINAT	TIONS	
4			
5	EXAMINATION		PAGE
6	By Mr. Hart		4
7	By Mr. Taylor		95
8			
9		EXHIBITS	
10			
11	NUMBER	DESCRIPTION	PAGE
12	Exhibit 2017:	Email from Konstantin Kropivny	38
13	Exhibit 1001-1:	Perrault patent 8,542,815 B2	63
14	Exhibit 2014:	Source code for the RBR server	66
15	Exhibit 2013:	Perrault declaration 005	69
16	Exhibit 2020:	Overview of the Digifonica	
17		system	88
18			
19			
20			
21			
22			
23			
24			
25			
1			



```
Page 4
 1
                 VANCOUVER, BRITISH COLUMBIA, CANADA.
 2
                           April 12, 2017
                                 ****
 3
 4
                           CLAY PERRAULT,
     called as a witness, having been first affirmed, was
 5
 6
     examined and testified as follows:
 7
 8
                          EXAMINATION
     BY MR. HART:
 9
10
          Q. Can you please state your full name for the
     record.
11
12
          A. Clay Steven Perrault.
          Q. Have you been disposed before, Mr. Perrault?
13
14
          A. It's my first time.
15
          Q. Let me go through a few ground rules.
                                                      It is my
16
     job to ask good questions, clear questions that you can
17
     understand. If you don't understand any part of any
18
     question I ask you, please ask me to rephrase, restate or
19
     clarify, is that ...?
20
          A. Okay.
21
                    Your attorney may object but unless you
22
     are instructed not to answer the question, please let him
23
     enter his objection and then go ahead and proceed with
24
     your answer.
25
          A. Okay.
```



Page 5

- Q. Two major rules for the benefit of Alyssa the
- 2 court reporter, we can't talk over each other. I'll do my
- 3 best to not speak when you're speaking; I would ask that
- 4 you do the same for me.
- 5 A. Okay.
- 6 Q. And finally audible answers only. No head shakes
- 7 or head nods. She can't get those on the record.
- 8 A. Okay.
- 9 Q. All right. What did you do to prepare for
- 10 today's deposition?
- 11 A. Yesterday I sat with Mr. David Gileff and Kerry
- 12 and we went over the process of what was about to happen
- 13 today.
- 14 Q. Okay. Have you talked to anyone other than
- 15 attorneys in preparation for today's deposition?
- 16 A. I have not.
- Q. Did you go to college?
- 18 A. University.
- 19 Q. University. Where did you go to university?
- 20 A. Simon Fraser here in Vancouver.
- Q. And did you obtain a degree from Simon Fraser?
- 22 A. No.
- Q. When did you begin your studies at Simon Fraser?
- 24 A. 1984.
- Q. What were you studying?



DOCKET

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.

