

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BRIAN E. SPRINGETT, Ph.D.

February 11, 2015

9:02 a.m.

VIDEOTAPED DEPOSITION OF BRIAN E. SPRINGETT,
Ph.D., taken by the Plaintiff at the offices of
Faegre, Baker & Daniels, 1470 Walnut Street,
Boulder, Colorado, before Melanie L. Giamarco, a
Registered Professional Reporter, Registered Merit
Reporter, Certified Realtime Reporter and Notary
Public of the State of Colorado.

1 BRIAN E. SPRINGETT, Ph.D.

2 APPEARANCES:

3 FITZPATRICK CELLA HARPER & SCINTO

4 Attorneys for the Plaintiff

5 By: Peter Shapiro Esq.

6 1290 Avenue of the Americas

7 New York, NY 10104

8

9 FITZPATRICK CELLA HARPER & SCINTO

10 Attorneys for the Plaintiff

11 By: Chitra Kalyanaraman Esq.

12 975 F Street Northwest

13 Washington, DC 20004

14

15 MORRIS MANNING & MARTIN

16 Attorneys for the Defendants

17 By: John Fry Esq.

18 3343 Peachtree Road Northeast

19 Atlanta, GA 30326

20

21

22

23

24

25

1 BRIAN E. SPRINGETT, Ph.D.

2 I N D E X

3 BRIAN E. SPRINGETT, Ph.D.	PAGE
4 By Mr. Shapiro	7, 236
5 By Mr. Fry	223

5

E X H I B I T S

6

7 EXHIBIT	DESCRIPTION	PAGE
-----------	-------------	------

7

8 Exhibit 1	Expert Report of Dr. B. E. Springett Regarding Invalidity of United States Patent No. 7,647,012	62
-------------	---	----

8

9

10 Exhibit 2	United States Patent No. 7,647,012	110
--------------	------------------------------------	-----

11

12 Exhibit 3	Expert Report of Dr. B. E. Springett Regarding Non-Infringement of United States Patent No. 7,647,012 in Response to the Initial Expert Report of Robert H. Sturges, Jr., Ph.D.	111
--------------	---	-----

12

13

14

15

16 Exhibit 4	Expert Report of Dr. B. E. Springett on the Technological Value of the '012 Patent in Response to the Expert Report of Michael E. Tate	112
--------------	--	-----

16

17

18

19 Exhibit 5	Rebuttal Expert Report of Dr. B.E. Springett Regarding Invalidity of United States Patent No. 7,647,012	113
--------------	---	-----

19

20

21 *Exhibit 6	Updated Joint Stipulation Between the Parties Regarding Representative Accused Toner Bottle Products	118
---------------	--	-----

22

23

24

25 *Original exhibit retained by Ms. Kalyanaraman

1 BRIAN E. SPRINGETT, Ph.D.

2 E X H I B I T S (CONTINUED)

3	EXHIBIT	DESCRIPTION	PAGE
4	Exhibit 7	Updated Joint Stipulation Between the Parties Regarding 5 Representative Accused Toner 6 Bottle Products	125
7	Exhibit 8	United States Patent Application Publication No. 2002/0044795 A1	149
8	Exhibit 9	United States Patent No. 9 6,698,966	150
10	Exhibit 10	United States Patent No. 6,501,990	150
11	Exhibit 11	United States Patent No. 12 5,218,407	151
13	Exhibit 12	United States Patent No. 5,765,079	151
14	Exhibit 13	United States Patent No. 15 5,903,806	152
16	Exhibit 14	United States Patent No. 5,966,574	152
17	Exhibit 15	United States Patent No. 18 6,298,208	153
19	Exhibit 16	United States Patent No. 6,412,163	153
20	Exhibit 17	Special Master's Claims 21 Construction Report and 22 Recommendations	240
23	Exhibit 18	Special Master's Claims Construction Report and 24 Recommendations	239
25			

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.