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IAN EDWARD RICHARDSON, Ph.D.

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBAL TEL-LINK CORPORATION,)
)Patent No.
)9,083,850 B1
vs.)
SECURUS TECHNOLOGIES, INC.,)
)Patent Owner.)

VIDEOTAPED DEPOSITION OF
IAN EDWARD RICHARDSON, Ph.D.,
Washington, D.C.
April 14, 2017

Job No. 121679

REPORTED BY: Tina Alfaro, RPR, CRR, RMR, CLR

IAN EDWARD RICHARDSON, Ph.D.

April 14, 2017
9:08 a.m.

The deposition of IAN EDWARD RICHARDSON, Ph.D., held at the offices of Sterne Kessler Goldstein & Fox, 1100 New York Avenue, NW, Washington, D.C., pursuant to agreement before Tina M. Alfaro, a Registered Professional Reporter and Certified Realtime Reporter of the District of Columbia.

IAN EDWARD RICHARDSON, Ph.D.
A P P E A R A N C E S:
STERNE KESSLER GOLDSTEIN & FOX
BY: BYRON PICKARD, ESQ.
STEVE PAPPAS, ESQ.
1100 New York Avenue, NW
Washington, D.C. 20005
On behalf of the Petitioner;

BRAGALONE CONROY
BY: NICHOLAS KLIEWER, ESQ.
2200 Ross Avenue
Dallas, Texas 75201
On behalf of the Patent Owner.

ALSO PRESENT: Victoria Ferrandino (videographer)

IAN EDWARD RICHARDSON, Ph.D.
I N D E X
E X A M I N A T I O N

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IAN EDWARD RICHARDSON, Ph.D.
THE VIDEOGRAPHER: This is the start of tape labeled No. 1 of the videotaped deposition of Dr. Ian Richardson in the matter of Global Tel-Link Corporation versus Securus Technologies, Inc. in the United Patent and Trademark Office before the Patent Trial and Appeal Board, Case No. IPR-2016-01362. This deposition is being held at 1100 New York Avenue, Northwest, Washington, D.C. on April 14, 2017 at approximately 9:08 a.m.

My name is Victoria Ferrandino from TSG Reporting and I'm the legal video specialist. The court reporter today is Tina Alfaro in association with TSG Reporting.

Will counsel please introduce yourself.
MR. KLIEWER: Nick Kliewer, Bragalone Conroy representing Securus Technologies.

MR. PICKARD: Byron Pickard from Sterne Kessler representing Global Tel-Link, and joining me is Steven Pappas.

THE VIDEOGRAPHER: Will the court reporter please swear in the witness.

(Witness sworn.)

1 IAN EDWARD RICHARDSON, Ph.D.
 2 WHEREUPON:
 3 IAN EDWARD RICHARDSON, Ph.D.,
 4 called as a witness herein, having been first duly
 5 sworn, was examined and testified as follows:

EXAMINATION

BY MR. KLIEWER:

Q. Good morning.

A. Good morning.

10 Q. Can you introduce yourself for the record,
 11 please.

12 A. Ian Edward Richardson.

13 Q. And I think you've been deposed before,
 14 correct?

15 A. Yes.

16 Q. Just to -- just a refresher on a few ground
 17 rules so we know what to expect from one another.
 18 Can we agree to try not to talk over one another?

19 A. Sure.

20 Q. And along with that, I'll let you finish
 21 answering my questions before I speak again and I'd
 22 like you to let me finish answering -- asking my
 23 questions before you begin to answer. Is that all
 24 right?

25 A. Sure.

1 IAN EDWARD RICHARDSON, Ph.D.
 2 today might be unreliable?

3 A. No.

4 Q. Dr. Richardson, where do you reside?

5 A. Aberdeen, Scotland.

6 THE VIDEOGRAPHER: Can we go off record for
 7 a second? Time is 9:11.

8 (A short break was had.)

9 THE VIDEOGRAPHER: Time is now 9:11 and
 10 we're back on record.

BY MR. KLIEWER:

12 Q. How long have you resided in Aberdeen?

13 A. 20- -- approximately 24 years in or near
 14 Aberdeen.

15 Q. And that's your current residence, correct?

16 A. Yes.

17 Q. What is your citizenship?

18 A. British citizen or UK citizen.

19 Q. Do you hold any other citizenships?

20 A. No.

21 Q. Have you ever gone by any other names other
 22 than Ian Richardson?

23 A. My first marriage I took my then wife's
 24 surname. So I was known on some documents as Ian
 25 Edward Garden Richardson, but I don't take that name

1 IAN EDWARD RICHARDSON, Ph.D.

2 THE VIDEOGRAPHER: Doctor, can you move
 3 your mic up?

4 THE WITNESS: Is that better?

5 THE VIDEOGRAPHER: A little bit higher.
 6 Thank you.

7 THE WITNESS: Okay.

BY MR. KLIEWER:

9 Q. Will you agree to make sure you answer all
 10 the questions verbally, for example, with a yes or
 11 no instead of nodding your head or making noises
 12 like uh-huh or uh-uh, that sort of thing?

13 A. Yes.

14 Q. And can we agree that if you don't
 15 understand a question that you'll let me know so
 16 that I can maybe reask the question in a way that
 17 you'll understand?

18 A. Yes.

19 Q. And that if you answer a question I'm going
 20 to assume that you understood the question?

21 A. Understood.

22 Q. Is there any reason why you cannot testify
 23 truthfully here today?

24 A. No.

25 Q. Is there any reason why your testimony here

1 IAN EDWARD RICHARDSON, Ph.D.
 2 anymore.

3 Q. And any other names?

4 A. No.

5 Q. How many times have you been deposed
 6 before?

7 A. I would say approximately 10 or perhaps 11
 8 times. I don't recall the exact number.

9 Q. And what kind of matters were those
 10 depositions regarding?

11 A. The majority were related to patent
 12 litigation proceedings. Two previous depositions
 13 were in relation to an inter partes review
 14 proceeding.

15 Q. Have you ever given live testimony before?

16 A. Could you explain what you mean by "live
 17 testimony," please?

18 Q. Sure. Have you given testimony in any
 19 other matter besides a deposition -- other than a
 20 deposition?

21 A. I have given testimony in court, if that's
 22 what -- if that's covered by the question.

23 Q. Yes. And in what matters have you done
 24 that?

25 A. If I remember correctly, in four patent

1 IAN EDWARD RICHARDSON, Ph.D.
2 litigation matters.

3 Q. So did you give four different sets of
4 testimony or was this four different cases or -- let
5 me -- let me rephrase that.

6 Was this all with regard to one case?

7 A. No. This was with regard to, if I remember
8 correctly, four different patent litigation cases.

9 Q. And what were those cases?

10 A. There were two cases in the Southern
11 District of California District Court. One was a
12 patent litigation between Qualcomm and Broadcom.
13 The other was a patent litigation between Multimedia
14 Patent Trust and Apple and I think LG. There may
15 have been other parties involved. Then there was --
16 there were two matters at the ITC. One of those was
17 a litigation between S3 Graphics and I think Apple.
18 The other was a litigation between -- I think it was
19 LSI Logic at that time, though they have changed
20 ownership since, and on the other side was, if I
21 remember correctly, Funai.

22 Q. The patents in those cases, were you
23 testifying for the patent owner or for the --

24 A. I think in each of the four court matters I
25 just mentioned in each case, if I remember

1 IAN EDWARD RICHARDSON, Ph.D.
2 correctly, I was testifying on behalf of the patent
3 owner.

4 Q. And what were the nature of those patents?

5 A. So there were a number of patents, more
6 than one patent in at least two of those cases, but
7 broadly speaking, the technologies covered were
8 video processing, video compression and also
9 graphics compression, graphics processing, and, as I
10 mentioned, a number of patents with relations to
11 those -- to those fields.

12 Q. I'm going to ask you a little bit about
13 some of the other cases you've testified in. Would
14 it be helpful for you to review your CV in order to
15 talk about those?

16 A. I would find that helpful, yes.

17 MR. PICKARD: I've already got a copy of
18 that, Nick.

19 MR. KLIEWER: Okay.

20 (Deposition Exhibit 1003 was
21 marked for identification.)

22 BY MR. KLIEWER:

23 Q. I'm handing you what's been previously
24 marked as Exhibit 1003 in this case. Do you
25 recognize this?

1 IAN EDWARD RICHARDSON, Ph.D.

2 A. It appears to be a copy of my CV dated June
3 2016.

4 Q. Is that CV still accurate as of today?

5 A. I believe there would be at least some
6 updates to it as of today.

7 Q. What updates would you make to your CV?

8 A. So if I remember correctly, I have
9 testified at deposition in two further matters, not
10 including today, since this -- the date of this CV.
11 I have published I think one more journal paper and
12 made one more conference presentation since that
13 date. I -- if I remember correctly, I have also
14 given a -- at least one further talk, but I think it
15 was at the -- the one I'm thinking of was at the
16 U.S. Patent and Trademark Office which is already
17 mentioned here. I am not aware of any other updates
18 to the CV. It's possible that one of the patent
19 applications I list on page 7 may have been granted.
20 I haven't actually checked that.

21 Q. The two additional matters where you gave
22 testimony, can you describe those matters, please.

23 A. I am not sure whether either matter --
24 whether my testimony is in the public domain. So I
25 would prefer not to give the names of parties unless

1 IAN EDWARD RICHARDSON, Ph.D.
2 I can check that, but generally the first of those
3 matters was a patent infringement -- sorry -- patent
4 litigation, if I remember correctly, a District
5 Court litigation which I believe has since settled.
6 The second matter was also a District Court
7 litigation, if I remember correctly, and, as far as
8 I'm aware, that is ongoing.

9 Q. Is that a patent case as well?

10 A. Yes.

11 Q. Can you tell me the nature of those
12 patents?

13 A. In both of those cases the patents relate,
14 if I remember correctly, to data compression
15 hardware. The core of the patent is about -- in
16 each case I think was about data compression. In
17 each case the intended application would be for
18 video processing and compression applications.

19 Q. The additional journal paper that you
20 mentioned, can you tell me the nature of that paper?

21 A. It was a paper published in the IASA
22 journal I think in January of this year, and it was
23 on video compression and video formats were the
24 specific -- in relation to archiving and retrieval
25 of digital media.

1 IAN EDWARD RICHARDSON, Ph.D.

2 Q. And the conference that you mentioned
3 that's not included on your CV, can you describe the
4 nature of your contribution in that conference?

5 A. Very similar to the previous answer and, in
6 fact, I gave the conference paper here in D.C. in
7 September last year and then was invited to submit a
8 paper for consideration for the journal. So the
9 conference was also organized by the same body,
10 IASA, which is -- relates to archiving of audio-
11 visual content.

12 Q. When you say "archiving of audio-visual
13 content," what does that mean?

14 A. I guess it's a -- it's a relatively broad
15 topic. The types of organizations involved in
16 that -- in that work might include universities,
17 institutions such as the Smithsonian here in
18 Washington, national bodies responsible for
19 archiving. Because it's audio-visual material many
20 of the large broadcasting companies and
21 organizations, national broadcasters have a
22 particular interest in building and maintaining
23 archives of their audio-visual content.

24 Q. And by "audio-visual content," what -- what
25 do you refer to there?

1 IAN EDWARD RICHARDSON, Ph.D.

2 A. Generally anything such as -- any audio
3 material such as sound recordings, music recordings,
4 any video material such as news, movies, television
5 programs. In relation to the IASA, very often
6 there's the organizations involved in archiving or
7 recording cultural and historically significant
8 material, but generally anything on -- anything that
9 is recorded in terms of visual material or audio
10 material or audio-visual where you have a picture
11 and a sound track.

12 Q. So is there then a difference between
13 audio-visual versus audio and video separately?

14 A. I'm not sure I understand the question.

15 Q. In a previous answer you talked about
16 building and maintaining archives of their audio-
17 visual content and then, correct me if I'm wrong,
18 you described separately audio content, video
19 content, and audio-visual content; is that correct?

20 A. I think the intention in my previous answer
21 was simply to try and list some examples of the
22 material that the IASA organization and conference
23 that I thought we were discussing was involved with
24 archiving, and the examples that I'm familiar with
25 from the other members of that organization, some of

1 IAN EDWARD RICHARDSON, Ph.D.

2 those examples include audio only content. I
3 certainly recall discussing examples of content that
4 includes video with accompanying audio. I don't
5 recall whether there was -- in that particular
6 conference or situation there was much requirement
7 for video without audio. I'm certainly aware of
8 situations where video might be captured or
9 processed without accompanying audio.

10 Q. When you say IASA, what is that?

11 A. I forget exactly what the acronym stands
12 for. It's something like the International Society
13 for Audio-Visual -- I'm sorry. I cannot actually
14 remember the rest of the acronym and I got the
15 letters in the wrong order. So I won't speculate
16 further.

17 Q. Can you tell me the nature of the
18 organization?

19 A. As far as I'm aware, it's an organization
20 with individual, institutional, and I think company
21 members. I don't recall seeing a specific statement
22 of its mission, but broadly I would understand it as
23 involving individuals, institutions, and companies
24 with a specific interest in the archiving matters I
25 described earlier. For example, the Smithsonian

1 IAN EDWARD RICHARDSON, Ph.D.

2 Institution is an active member and, if I remember
3 correctly, they were the -- it was a contact at the
4 Smithsonian who recommended that I -- either to me
5 or to the IASA that I present at their conference
6 last year.

7 Q. And is that the conference that you were
8 referring to when you were discussing the additional
9 material that would be on your CV?

10 A. Yes.

11 Q. Did you prepare your CV as it's filed here
12 independently or was it prepared for you?

13 A. I prepared it.

14 Q. Referring to page 2 of your CV under the
15 heading "Expert Witness and Intellectual Property
16 Experience," you have four matters listed there,
17 correct?

18 A. I'm sorry. Which matters are you referring
19 to?

20 Q. The ones numbered 1, 2, 3, and 4.

21 A. I see those.

22 Q. And those are all -- let me rephrase.

23 And the matters numbered 5, 6, and 7, why
24 are those separated from the first four matters?

25 A. As I think is clear on page 2 of my CV, I

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