1 UNITED STATES PATENT AND TRADEMARK OFFICE

   BEFORE THE PATENT TRIAL AND APPEAL BOARD

2 _____

3 TOYOTA MOTOR CORP.,

4   Petitioner,

5   -against-

6 SIGNAL IP, INC.,

7   Patent Owner.

8 Case IPR2016-00292

9 Patent 6,012,007

   _____

10

11   July 20, 2016

                    8:58 a.m.

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13

14

15   DEPOSITION of SCOTT ANDREWS,

16 held at the offices of KENYON & KENYON

17 LLP, One Broadway, New York, New York

18 before Wayne Hock, a Notary Public of

19 the State of New York.

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21

22

23   Veritext Legal Solutions

         Mid-Atlantic Region

     1250 Eye Street NW - Suite 350

24   Washington, D.C. 20005

25

1   A P P E A R A N C E S:

2

        KENYON & KENYON LLP
3   Attorneys for Petitioner
                One Broadway
4   New York, New York 10004
5   BY: MARK A. CHAPMAN, ESQ.
                mchapman@kenyon.com
6   DRAGAN PLAVSIC, ESQ.
                dplavsic@kenyon.com
7   KULSOOM HASAN, ESQ.
                khasan@kenyon.com

8

9   ASCENDA LAW GROUP, PC
        Attorneys for Patent Owner
10   333 West San Carlos Street
                San Jose, California 95110

11

        BY: TAREK N. FAHMI, ESQ.
12   tarek@ascendalaw.com
                JASON A. LABERTEAUX, ESQ.
13   jason.laberteaux.com
14   *   *   *

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1 S C O T T A N D R E W S, having

2 been first duly sworn by a

3 Notary Public of the State of

4 New York, upon being examined,

5 testified as follows:

6 EXAMINATION BY

7 MR. FAHMI:

8 Q. What is your current address?

9 A. 704 Paula Lane, Petaluma,

10 California 94052.

11 Q. Would you state your name for

12 the record, please.

13 A. Scott Andrews.

14 Q. Good morning, Mr. Andrews.

15 My name is Tarek Fahmi and I'm here

16 representing Signal IP. This is my

17 colleague Jason LaBerteaux.

18 MR. CHAPMAN: Let me introduce

19 Mr. Andrews as the witness. I'm

20 Mark Chapman at Kenyon and Kenyon

21 for the witness and Toyota. And

22 with me are two colleagues, Dragan

23 Plavsic and Kulsoom Hasan.

24 Q. Mr. Andrews, have you ever

25 given a deposition before?

1   A.   Yes, I have.

2   Q.   Approximately how many times?

3   A.   Maybe twenty.

4   Q.   I'm sure you've heard some of

5   these instructions before but just so

6   that we have a common understanding,

7   during today's deposition I'll be

8   asking questions and you'll be

9   providing answers. But if I ask a

10   question that is unclear or you didn't

11   understand or you just want me to

12   repeat it for any reason, just let me

13   know. I'll be happy to repeat it or

14   rephrase it if it wasn't clear, try to

15   make it more clear. I just need to

16   know that you want it repeated or

17   rephrased.

18   Okay?

19   A.   Okay.

20   Q.   On the other hand, if you

21   answer a question and you haven't asked

22   me to rephrase it or repeat it, I'm

23   going to assume that you're answering

24   the question that I've asked.

25   All right?

1   A.   Yes.

2   Q.   As you're doing, if you'd

3 please continue to give audible

4 answers, that will help the court

5 reporter with his job. He can't really

6 take down gestures or nods of the head

7 or mumbles or that sort of thing, so

8 audible answers, please.

9   A.   All right.

10   Q.   Also, as you're doing, if you

11 would please wait until I finished

12 asking the question before you give

13 your answer, I'll try and do the same

14 and make sure that you wait until

15 you've finished your answer before I

16 ask another question. Again, this

17 helps the court reporter keep a clear

18 record. He only has to worry about

19 taking down what one person is saying

20 at a time.

21   Is that all right?

22   A.   Yes.

23   Q.   Is there any reason you can't

24 give your best testimony here today?

25   A.   No.

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