

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3
4 CISCO SYSTEMS, INC.,)
5)
6 Petitioner,) Case No.
7) IPR2016-01466
8 vs.)
9) U.S. Patent No.
10 TQ DELTA, LLC,) 8,611,404 B2
11)
12 Patent Owner.)
13
14 The deposition of DOUGLAS A. CHRISSAN,
15 Ph.D., called as a witness for examination, taken
16 before VICTORIA C. CHRISTIANSEN, a Certified
17 Shorthand Reporter of the State of Illinois, CSR
18 No. 84-3192, at Suite 3500, 500 West Madison
19 Street, Chicago, Illinois, on the 14th day of July,
20 A.D. 2017, at 9:13 a.m.
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PRESENT:

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

-and-

HAYNES AND BOONE, LLP,
(2505 North Plano Road, Suite 4000,
Richardson, Texas 75082-4101,
972-739-8649), by:
MR. MICHAEL S. PARSONS,
michael.parsons@haynesboone.com, and
MR. THEODORE M. FOSTER,
theo.foster@haynesboone.com,

appeared on behalf of the Petitioner;

McANDREWS, HELD & MALLOY, LTD.,
(500 West Madison Street, 34th Floor,
Chicago, Illinois 60661,
312-775-8000), by:
MR. CHRISTOPHER M. SCHARFF,
cscharff@mcandrews-ip.com, and
MR. RAJENDRA A. CHIPLUNKAR,
rchiplunkar@mcandrews-ip.com,

appeared on behalf of the Patent Owner.

ALSO PRESENT:

SAYFE KIAEI, Ph.D.
Arizona State University.

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



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1 (WHEREUPON, the witness was duly
2 sworn.)

3 DOUGLAS A. CHRISSAN, 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. Good morning, Dr. Chrissan.

9 A. Good morning.

10 Q. So I'm going just go ahead and hand you
11 four exhibits that are -- have been previously
12 marked. They are your declarations in the 1760 and
13 1466 IPRs plus the patents in those IPRs, the '268
14 and '404 patents, okay?

15 I'll hand those to you. We'll be
16 talking about those throughout the day.

17 MR. EMERSON: Here you go, Chris.

18 BY MR. EMERSON:

19 Q. Before we get started on those
20 particular documents, any reason why you can't
21 testify truthfully and accurately today?

22 A. None that I know.

23 Q. Okay. When were you retained in this
24 case for these IPRs?



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1 A. For these particular IPRs, I believe it
2 was towards the beginning -- around the beginning
3 of this year.

4 Q. It was in 2017?

5 A. Well, I have to ask a clarification
6 question. What exactly do you mean by I was
7 retained? I mean, I was told that I was going to
8 be working on these particular IPRs?

9 Q. Sure. When someone came to you and
10 said, "Can you serve as our expert witness in these
11 IPRs?"

12 A. For these particular IPRs?

13 Q. Yes, sir.

14 A. Because I believe, as you know, I've
15 been involved in other IPRs. One other on the '268
16 and two other on the '404.

17 So I don't remember the exact date for
18 these particular IPRs, but as I said, I believe it
19 was in 2017, earlier this year.

20 Q. Okay. And did you begin working on
21 those immediately after being retained?

22 A. I don't remember the exact dates that I
23 was told, "You are --" I am going to be working on
24 these IPRs. As I mentioned, I believe that around



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1 that date I at least scanned some of the initial
2 materials, but beyond that, the specific -- the
3 specific progression of the work I don't remember
4 exactly other than the fact that it certainly
5 increased significantly near the due date of the
6 declaration.

7 Q. Okay. Would you turn to your
8 declaration in the '404 IPR, which is IPR
9 2016-04166?

10 A. So you said Page?

11 Q. Would you just get that -- that
12 declaration out? Do you have it?

13 A. Uh-huh.

14 Q. All right. And let's go to Page 47.

15 A. Okay.

16 Q. And specifically I'm looking at
17 Paragraph 87.

18 Do you see that?

19 A. Yes.

20 Q. All right. And there you give us a
21 construction of the term "at least one parameter
22 associated with the full power mode operation."

23 Do you see that?

24 A. Yes.



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