

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

3
4 APPLE INC.,

5 Petitioner,

6 -v-

7 Case No.:
IPR2016-01561

8 U.S. Patent No. 6,233,181

9
10 LIMESTONE MEMORY SYSTEMS LLC,

11 Patent Owner.

12
13 Videotaped Deposition Of Expert:

14 SUNIL P. KHATRI, Ph.D.

15 Friday, July 28, 2017
16 9:00 a.m. - 2:03 p.m.

17
18 HELD: Hampton Inn - Rome
1352 Floyd Avenue
19 Rome, New York

20 BEFORE: Brenda J. O'Connor-Marello, CSR,
21 Certified Shorthand Reporter and
Notary Public in and for the

22 State of New York.

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

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21 Also Present:

22 Edward Roy - Videographer

1	VIDEOGRAPHER: Here begins tape	09:00:34
2	number 1 in the videotaped deposition	09:00:35
3	of Sunil P. Khatri in the matter of	09:00:37
4	Apple, Inc., Petitioner, versus	09:00:41
5	Limestone Memory Systems, LLC, Patent	09:00:44
6	Owner, in the United States Patent and	09:00:46
7	Trademark Office before the Patent	09:00:48
8	Trial and Appeal Board, Case Number	09:00:51
9	IPR2016-01561.	09:00:54
10	Today's date is July 28, 2017.	09:01:00
11	The time is now approximately	09:01:03
12	9:00 a.m.	09:01:06
13	The videographer today is Edward	09:01:07
14	Roy, representing Planet Depos.	09:01:09
15	This video deposition is taking	09:01:12
16	place at the Hampton Inn, 1352 Floyd	09:01:15
17	Avenue, Rome, New York.	09:01:19
18	Will counsel please identify	09:01:21
19	themselves and say who they represent.	09:01:22
20	MR. HUTCHINS: John Hutchins	09:01:24
21	from Andrews Kurth Kenyon,	09:01:25
22	representing Apple.	09:01:25

1	MR. BROXTERMAN: Eric Broxterman	09:01:28
2	from Fitch, Even, Tabin & Flannery,	09:01:28
3	representing the witness, Dr. Khatri,	09:01:31
4	and Limestone Memory Systems.	09:01:33
5	VIDEOGRAPHER: The court	09:01:35
6	reporter today is Brenda Marello,	09:01:36
7	representing Planet Depos.	09:01:38
8	Would the reporter please swear	09:01:40
9	in the witness.	09:01:42
10	SUNIL P. KHATRI, Ph.D.,	09:01:42
11	called as the witness, hereinbefore named, being	09:01:42
12	first duly cautioned and sworn or affirmed by	09:01:42
13	Brenda J. O'Connor-Marello, a Certified	09:01:42
14	Shorthand Reporter and Notary Public in and for	09:01:42
15	the State of New York, Qualified in Saratoga	09:01:42
16	County, herein to tell the truth, the whole	09:01:42
17	truth, and nothing but the truth, was examined	09:01:42
18	and testified as follows:	09:01:42
19	EXAMINATION	09:01:52
20	BY MR. HUTCHINS:	09:01:53
21	Q. Before we start -- Dr. Khatri? Or	09:01:55
22	Mr. Khatri? Professor Khatri? How would	09:01:58

1 you like me to refer to you today? 09:02:02

2 A. Dr. Khatri is good. Professor. Either 09:02:05

3 way. 09:02:06

4 Q. Very good. 09:02:07

5 Dr. Khatri, could you tell us who 09:02:08

6 you are and where you work currently? 09:02:10

7 A. My name is Sunil Khatri. I work at Texas 09:02:13

8 A&M University. I'm a professor of 09:02:16

9 electrical and computer engineering. 09:02:20

10 Q. And, Dr. Khatri, am I correct that you 09:02:23

11 submitted a declaration in an IPR petition 09:02:26

12 between Apple and Limestone? 09:02:30

13 A. That's correct. 09:02:32

14 Q. And I'll put in front of you what's been 09:02:33

15 marked as Exhibit 2004 and ask you: Is 09:02:39

16 that the declaration that you submitted in 09:02:43

17 the IPR? 09:02:45

18 A. Let's see. I just want to make sure it 09:02:51

19 has -- is this right? 09:02:54

20 MR. BROXTERMAN: I believe you 09:03:00

21 have the wrong one. This is the 09:03:02

22 declaration. I believe you handed him 09:03:03

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