```
Page 1
 1
                  UNITED STATES PATENT AND TRADEMARK OFFICE
 2
                  BEFORE THE PATENT TRIAL AND APPEAL BOARD
 3
        CISCO SYSTEMS, INC. AND DISH
                                        ) CASE IPR
 4
        NETWORK, LLC
                                             ) 2016-01466
                                             ) Patent No.
 5
                   Petitioner,
                                              ) 8,611,404
 6
                                             ) CASE IPR
        vs.
                                             ) 2016-01760
        TQ DELTA, LLC,
                                              ) Patent No.
                                              ) 9,094,268
 8
                   Patent Owner.
9
10
11
12
13
                     DEPOSITION OF DR. SAYFE KIAEI
14
15
                               Phoenix, Arizona
16
                                March 28, 2017
17
                                   8:35 a.m.
18
19
                               *2ND REVISED*
20
21
22
23
24
     REPORTED BY: Kristy A. Ceton, RPR
25
     JOB NO: 121017
```

TSG Reporting - Worldwide - 877-702-9580



	Page 2				
1	DR. SAYFE KIAEI				
2	DEPOSITION OF DR. SAYFE KIAEI				
3	commenced at 8:35 a.m., on March 28, 2017, at Snell &				
4	Wilmer, LLP, One Arizona Center, 400 East Van Buren,				
5	Suite 1900, Phoenix, Arizona, before Kristy A. Ceton,				
6	RPR, Arizona Certified Court Reporter No. 50200.				
7					
8	* * *				
9					
10	APPEARANCES:				
11	For the Petitioner:				
12	HAYNES AND BOONE				
13	By: John Emerson, Esq. David McCombs, Esq.				
14	Theodore Foster, Esq. Michael Parsons, Esq.				
15	2323 Victory Avenue Dallas, TX 75219				
16	For the Patent Owner:				
17	MCANDREWS HELD & MALLOY				
18	By: Thomas Wimbiscus, Esq. Raj Chiplunkar, Esq.				
19	500 West Madison Street Chicago, IL 60661				
20					
21					
22					
23					
24					
25					



				Page 3
1	DR.	SAYFE KIAEI		
2		INDEX		
3				
4	EXAMINATION BY		PAGE	
5				
6	Mr. Wimbiscus		4	
7				
8				
9				
10				
11	EXHIBITS	DESCRIPTION	PAGE	
12	Exhibit 2001	U.S. Patent 6,075,814 Figure 4	132	
13	Exhibit 2002	U.S. Patent 6,075,814	171	
14	IMILOTO 2002	Figure 4	171	
15	Exhibit 2003	CPE Receiver 400/CO Transmitter document	180	
16		Transmitteer document		
17				
18				
19				
20				
21				
22				
23				
24				
25				
i				



```
Page 4
 1
                     DR. SAYFE KIAEI
 2.
                                             Phoenix, Arizona
                                             March 28, 2017
                                             8:35 a.m.
 3
 4
 5
                             SAYFE KIAEI,
 6
       called as a witness herein, having been first duly
       sworn, was examined and testified as follows:
 8
 9
                             EXAMINATION
10
       By MR. WIMBISCUS:
11
              Q.
                    Good morning, Dr. Kiaei.
12
              Α.
                    Yes.
13
                    Would you please state and spell your
       name for the record?
14
                    Sayfe, S-a-y-f-e; Kiaei, K-i-a-e-i.
15
              Α.
                    What is your residence address?
16
              Ο.
                    13325 North Manzanita Lane, Fountain
17
              Α.
       Hills, Arizona 85268.
18
19
              Ο.
                    What is your age?
                    57.
20
              Α.
21
                    Do you understand that you're here to
              Ο.
22
       testify with respect to two different IPR
23
       proceedings; namely, IPR 2016-01466 involving the
24
       '404 patent, U.S. patent No. 8611404 and IPR
25
       2016-014- -- I'm sorry -- IPR 2016-01760 involving
```



- 1 DR. SAYFE KIAEI
- 2 U.S. patent No. 9094268?
- 3 A. Yes, I am.
- 4 Q. And if I refer to those patents as the
- 5 '404 patent and the '268 patents, respectively,
- 6 you'll understand what I'm referring to?
- 7 A. Yes, I do, Counsel.
- Q. Thank you.
- 9 A. Thank you.
- 10 Q. Okay. So you've had your deposition
- 11 taken a number of times, I trust?
- 12 A. Yes, Counsel.
- Q. Okay. And I'll just go over the ground
- 14 rules just to make them fresh for you.
- 15 You understand that the court reporter is
- here and you have to answer audibly?
- 17 A. Yes, I do.
- 18 Q. And if you don't understand a question,
- 19 just ask me to repeat it or clarify it and I'll do my
- 20 best to clarify. Okay?
- 21 A. Thank you.
- Q. If you answer the question, I'll assume
- you understood the question. Fair enough?
- 24 A. Okay.
- Q. And I'll try to take periodic breaks,



DOCKET

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.

