

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

3
4 REACTIVE SURFACES LTD. LLP,

5 Petitioner,

6 v.

7 TOYOTA MOTOR CORPORATION,

8 Patent Owner.

9
10 Case IPR2016-01462
Patent No. 8,324,295 B2

11 *****

12 DEPOSITION OF

13 DAVID ROZZELL, Ph.D.

14 NOVEMBER 15, 2017

15 *****

16 ORAL DEPOSITION OF DAVID ROZZELL, Ph.D., produced
17 as a witness at the instance of the Patent Owner, was
18 duly sworn, was taken in the above-styled and numbered
19 cause on the NOVEMBER 15, 2017, from 9:15 a.m. to
20 11:59 a.m., before Chris Carpenter, CSR, in and for the
21 State of Texas, reported by machine shorthand, at the
22 offices of U.S. Legal Support, 701 Brazos Street, Suite
23 380, Austin, Texas 78701, pursuant to the Federal Rules
24 of Civil Procedure and the provisions stated on the
25 record or attached hereto.

TOYOTA EXHIBIT 2017

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A P P E A R A N C E S

FOR THE PETITIONER:

Rico Reyes

David O. Simmons, Patent Agent
IVC PATENT AGENCY
P.O. Box 26584
Austin, TX 78755
(512) 345-9767
dsimmons@sbcglobal.net

Jonathan D. Hurt, Patent Agent
McDANIEL & ASSOCIATES, PC

FOR THE PATENT OWNER:

Oleg Khariton (by video conference)
DINSMORE & SHOHL, LLP
255 East Fifth Street
Suite 1900
Cincinnati, OH 45202
(512) 977-8200
oleg.khariton@dinsmore.com

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INDEX

Appearances.....2

DAVID ROZZELL, Ph.D.

 Examination by Mr. Khariton.....4

 Examination by Mr. Reyes.....46

 Further Examination by Mr. Khariton.....59

Changes and Signature.....64

Reporter's Certificate.....65

EXHIBITS

NO.	DESCRIPTION	PAGE
1001	United States Patent 8,394,618 B2	55
1013	Chemical Characterization of Fingerprints from Adults and Children	17
1018	Reply Declaration of Dr. David Rozzell	5
1024	Chapter by Ramotowski	31
1025	US Patent Application Publication 2008/0119381 A1	11
2013	Advanced Fingerprint Analysis Project Fingerprint Constituents	44
2015	Article: How does Fingerprint Powder Work	19

1 DAVID ROZZELL, Ph.D.,
2 having been first duly sworn to testify the truth, the
3 whole truth, and nothing but the truth, testified as
4 follows:

5 EXAMINATION

6 BY MR. KHARITON:

7 Q. Dr. Rozzell, good morning. I know this is not
8 your first deposition, since I've had the pleasure of
9 deposing you before, but I'm going to take just a couple
10 of moments to go over the basics. So I'm going to be
11 asking a series of questions, and Chris, Mr. Carpenter,
12 is going to be taking down my questions and your
13 answers. So in order to help him, let's do our best not
14 to talk at the same time. Please answer verbally; so
15 avoid simply nodding or shaking your head. If you don't
16 understand a question, please let me know, and I'll do
17 my best to clarify. If you answer a question, then I'm
18 going to assume that you heard it and then you -- that
19 you understood it. And if you need a break at any
20 point, just let me know and as long as there's not a
21 question pending, we'll break.

22 What, if anything, did you do to prepare
23 for your deposition today?

24 A. I reviewed my own -- my own declaration. And I
25 met yesterday with some of the members of the legal team

1 here, and we reviewed my declaration and prepared for
2 possible responses.

3 Q. Okay.

4 A. I also reviewed some of the prior art
5 materials.

6 Q. Okay. And my question was: Who did you talk
7 to in preparing for this deposition?

8 A. I spoke with Dr. McDaniel, Dr. Hurt,
9 Mr. Simmons and Mr. Reyes.

10 Q. Okay.

11 MR. KHARITON: Okay. Mr. Carpenter, can
12 you please hand Dr. Rozzell Exhibit 1018, and there
13 should be a copy for counsel as well.

14 (Exhibit 1018 handed to witness.)

15 Q. (By Mr. Khariton) Dr. Rozzell, do you recognize
16 this document?

17 A. Yes.

18 Q. And can you identify it for the record?

19 A. It looks like a copy of my declaration.

20 Q. Can you please turn to -- and we need to make
21 sure that it's an accurate copy. That's fine, take your
22 time. But I'm going to ask you about Paragraph 28.
23 It's on pages -- begins on Page 9 and goes -- finishes
24 on Page 10.

25 A. Okay, I'm there.

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