

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

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3 DIGITAL CHECK CORP. d/b/a ST IMAGING,  
4 Petitioner,

5 v.

6 E-IMAGEDATA CORP.  
7 Patent Owner.

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8 Case IPR2017-00177  
9 Case IPR2017-00178  
10 Patent 8,537,279 B2

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13  
14 The deposition of ANTHONY J. SENN, taken in  
15 the above-entitled cause, before Ronda L. Jones, a notary  
16 public of Cook County, Illinois, on the 14th day of July,  
17 2017, at 70 West Madison Street, Suite 2800, Chicago,  
18 Illinois, at the hour of 9:05, pursuant to notice.

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24 Reported by: Ronda L. Jones, CSR, RPR

25 License No.: Illinois 084-002728

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ALSO PRESENT: MR. BRETT WEBER.

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I N D E X

WITNESS	PAGE
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FOLLOWING EXHIBITS WERE PREVIOUSLY MARKED

AND REFERRED TO IN THIS DEPOSITION

NUMBER	PAGE
Exh. 1001 - 019 Patent	53
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(Previously marked exhibits retained by Mr. Piery)

1 ANTHONY J. SENN,  
2 called as a witness herein, having been first duly sworn, was  
3 examined and testified as follows:

4 CROSS EXAMINATION

5 BY MR. PIERY:

6 Q. Good morning, Mr. Senn.

7 A. Morning.

8 Q. Can you please state your full name for the record?

9 A. Anthony Joseph Senn.

10 Q. So you've submitted three declarations in these IRP  
11 proceedings between Digital Check Corp. and e-ImageData Corp.  
12 So one of those proceedings was not instituted. So we're  
13 here today to talk about your declarations in the other two  
14 proceedings, all right?

15 A. Understood.

16 Q. And the parties have agreed that your testimony  
17 today can be used for both proceedings. So we're going to be  
18 submitting two declarations. We're going to take one  
19 deposition to address both of them, all right?

20 A. Understood.

21 Q. Now, have you had your deposition taken before?

22 A. No. This is my first.

23 Q. I'll go over a couple ground rules that your  
24 counsel has probably discussed with you. But just to make  
25 sure we're on the same page, the court reporter here is

1 typing down everything we say. So to help keep the record  
2 clean and to make her job easier I ask that you wait until I  
3 finish asking my question before you give your answer, okay?

4 A. Okay.

5 Q. And I'll try my best to wait until you finish  
6 answering the question before I ask the next question, okay?

7 A. Very good.

8 Q. Now, you were just sworn in. So you understand  
9 you're under oath and you're required to give truthful  
10 answers, all right?

11 A. I do.

12 Q. Is there any reason you can't give truthful answers  
13 today?

14 A. No.

15 Q. Now, if I ask a question and you don't understand  
16 the question, please just ask me to clarify, okay?

17 A. (Nodding head.)

18 Q. And if you don't ask for a clarification, I'll  
19 assume that you understood the question, all right?

20 A. Okay.

21 Q. I anticipate that this is going to be a short  
22 deposition, but if you need a break, just let me know. And  
23 note that if we do take a break, the rules of this proceeding  
24 mean that you cannot talk to your counsel about your  
25 testimony during the break, okay?

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