

# Transcript of Ian A. Wilson, D.Phil.

Date: April 21, 2018

Case: Pfizer, Inc. -v- Genentech, Inc. (PTAB)

**Planet Depos** 

Phone: 888.433.3767

Email:: transcripts@planetdepos.com

www.planetdepos.com

WORLDWIDE COURT REPORTING | INTERPRETATION | TRIAL SERVICES



# Transcript of Ian A. Wilson, D.Phil. Conducted on April 21, 2018

```
APPEARANCES
         UNITED STATES PATENT AND TRADEMARK OFFICE
         BEFORE THE PATENT TRIAL AND APPEAL BOARD
                                                                          2 ON BEHALF OF THE PETITIONER PFIZER, INC.:
                                                                                 BENJAMIN LASKY, ESO.
                                                                                 KIRKLAND & ELLIS, LLP
   PFIZER, INC. and SAMSUNG BIOEPIS
                                                                                  601 Lexington Avenue
                                                                                  New York, New York 10022
                                                                                  (212) 446-6415
                   Petitioners,
                                      Case No.: 1
IPR2017-01488
                                                                                  blasky@kirkland.com
                                      IPR2017-01489 <sup>1</sup>
Patent 6,407,213
                                                                                             -and-
10 -vs -
                                                                                  SHARICK NAQI, ESQ.
11 GENENTECH, INC.,
                                                                          11
                                                                                 KIRKLAND & ELLIS, LLP
                   Patent Owner.
                                                                          12
                                                                                  300 North LaSalle
                                                                          13
                                                                                  Chicago, Illinois 60654
   Case IPR2017-02139 has been joined with this
14
                                                                                  (312) 862-3235
   proceeding.
                                                                          15
                                                                                  sharick.nagi@kirkland.com
     1
Case IPR2017-02140 has been joined with this
16
                                                                          16
17
   proceeding.
                                                                          17 ON BEHALF OF THE PETITIONER CELLTRION INC.:
18
          Deposition of IAN A. WILSON, D.Phil.
                                                                                  ROBERT V. CERWINSKI, ESQ.
19
                La Jolla, California
                                                                          19
                                                                                  GOODWIN PROCTER, LLP
20
                Saturday, April 21, 2018
                                                                          20
                                                                                  620 Eighth Avenue
21
                        9:07 a.m.
                                                                          21
                                                                                  New York, New York 10018
22 Job No.: 185272
                                                                          22
                                                                                  (212) 459-7240
23 Pages: 1 - 299
                                                                          23
                                                                                  rcerwinski@goodwinlaw.com
24 Reported by: Tricia Rosate, RDR, RMR, CRR, CCRR
                                                                          24
25 CSR No. 10891
   Deposition OF IAN A. WILSON, D.Phil, held at:
                                                                                 A P P E A R A N C E S (Continued)
              Residence Inn by Marriott
                                                                             ON BEHALF OF THE PETITIONER SAMSUNG BIOEPIS:
              8901 Gilman Drive
                                                                                  AMIT THAKORE, ESQ.
              La Jolla, California 92037
                                                                                  WHITE & CASE, LLP
              (858) 587-1770
                                                                                  1221 Avenue of the Americas
                                                                                  New York, New York 10020-1095
                                                                                  (212) 819-2692
                                                                                  athakore@whitecase.com
                                                                          10 ON BEHALF OF THE PATENT OWNER GENENTECH, INC.:
                                                                          111
                                                                                  ANDREW J. DANFORD, ESO.
        Pursuant to Notice, before Tricia Rosate, RDR,
   {\sf RMR},\ {\sf CRR},\ {\sf CCRR},\ {\sf Certified} Shorthand Reporter No.
                                                                          12
                                                                                  WILMER CUTLER PICKERING HALE and DORR, LLP
   10891 in and for the State of California.
                                                                                  Boston, Massachusetts 02109
15
                                                                          15
                                                                                  (617) 526-6806
                                                                                  andrew.danford@wilmerhale.com
                                                                                               -and-
                                                                          18
18
                                                                                  NORA O.E. PASSAMANECK. ESO.
19
                                                                          19
                                                                                  WILMER CUTLER PICKERING HALE and DORR, LLP
20
                                                                          20
                                                                                  1225 17th Street
21
                                                                          21
                                                                                  Suite 2600
22
                                                                          22
                                                                                  Denver, Colorado 80202
23
                                                                          23
                                                                                  (720) 274-3152
                                                                          24
                                                                                   nora.passamaneck@wilmerhale.com
25
```

### PLANET DEPOS 888.433.3767 | WWW.PLANETDEPOS.COM



# Transcript of Ian A. Wilson, D.Phil. Conducted on April 21, 2018

_	Conducted on April 21, 2018			
1	5 APPEARANCES (Continued)	1 LA JOLLA, CALIFORNIA; SATURDAY, APRIL 21, 2018		
2	ALSO PRESENT:	2 9:07 A.M 6:15 P.M.		
3	SARAH MILLER, The Videographer	3		
4	TRACI ROPP, Genentech	4 THE VIDEOGRAPHER: Here begins Tape No. 1 in		
5		5 the videotaped deposition of Dr. Ian Wilson in the		
6		6 matter of Pfizer vs. Genentech and Celltrion vs.		
7		7 Genentech, Case No. IPR2017-01486-01489 [sic] and		
8		8 Case No. IPR2017-01373-01374.		
9		9 Today's date is April 21, 2018. The time on		
10		10 the video monitor is 9:07 a.m.		
11		1-4		
12				
13		12 representing Planet Depo.		
14		13 This video deposition is taking place at		
15		14 8901 Gilman Drive, La Jolla, California.		
16		15 Will counsel please voice identify		
17		16 themselves and state whom they represent.		
18		17 MR. LASKY: My name's Ben Lasky from		
19		18 Kirkland & Ellis. I represent Pfizer.		
20		With me today from Kirkland & Ellis is		
21		20 Sharick Naqi.		
22		21 MR. CERWINSKI: I'm Robert Cerwinski. I'm		
23		22 with Goodwin Procter, LLP, and I represent Celltrion,		
24		23 petitioner.		
25		24 MR. THAKORE: Amit Thakore from White & Case		
		25 representing petitioner Samsung Bioepis.		
1	C O N T E N T S	8 1 MR. DANFORD: Andrew Danford from WilmerHale		
2	EXAMINATION OF IAN A. WILSON, D.Phil. PAGE			
3	By Mr. Lasky			
4	By Mr. Cerwinski	3 and I'm joined today by Nora Passamaneck of		
5	By Mr. Danford	4 WilmerHale and Traci Ropp of Genentech.		
6	270	5 THE VIDEOGRAPHER: Okay. The court reporter		
7	EXHIBITS	6 today is Tricia Rosate representing Planet Depo.		
8	(Attached to transcript)	7 Will the reporter please swear in the		
9	WILSON DEPOSITION EXHIBIT PAGE	8 witness.		
10	Exhibit 1194 "Humanization of a mouse 187	9 IAN A. WILSON, D.Phil.,		
11	anti-human IgE antibody: a	10 having been first duly sworn, testified as follows:		
12	potential therapeutic for	11 EXAMINATION		
13	IgE-mediated allergies"	12 BY MR. LASKY:		
14		13 Q Good morning, Dr. Wilson.		
15	Exhibit 1195 "Applications and Engineering 217	14 I just need to say something for the record.		
16	of Monoclonal Antibodies"	15 The first case number, 2017-01488, and that's my		
17		16 fault, my handwriting. So		
18		17 Good morning.		
19	PREVIOUSLY MARKED EXHIBITS	18 A Good morning.		
20	Exhibit 1001 Exhibit 1055	19 Q Could you please state your full name for		
21	Exhibit 1002 Exhibit 1071	20 the record.		
22	Exhibit 1003 Exhibit 1125	21 A Ian Andrew Wilson.		
23	Exhibit 1021 Exhibit 1193	22 Q And have you had your deposition taken		
24	Exhibit 1034 Exhibit 2041	23 before?		
25	Exhibit 1052	24 A Yes.		
		25 Q How many times?		

## PLANET DEPOS 888.433.3767 | WWW.PLANETDEPOS.COM



# Transcript of Ian A. Wilson, D.Phil. Conducted on April 21, 2018

Conducted on April 21, 2018		
1 A I can't remember how many. About three or	11 You I'm not understanding some of the	
2 four.	2 questions.	
3 Q Okay. And were they all in connection with	3 Q Okay. Sure. So you understand that the	
4 expert witness work?	4 proceeding that you're here for today is an	
5 A Yes.	5 inter partes review in the U.S. Patent and Trademark	
6 Q Okay. How many times have you previously	6 Office?	
7 served as an expert witness in a litigation or	7 Do you understand that?	
8 patent office proceeding?	8 A I understand it now.	
9 A Could you explain?	9 Q Oh, okay. Okay. Well, why don't you tell	
10 Q Sure. Well, let's start with a	10 me. What other cases have you been involved in as an	
11 district court action.	11 expert witness?	
12 Have you ever served as an expert in a court	12 A They've they'e largely been to do to	
13 action?	13 do with cases to do with with patents. By and	
14 A One. One time.	14 large, I think it's been patents.	
15 Q Okay. And who were you retained by in that	15 I had one other case that had noth that	
16 case?	16 was that was a separate issue that was just a	
17 A WilmerHale.	17 dispute between parties on some scientific grounds.	
18 Q Okay. And who was the	18 Q Okay. Have you ever previously been	
19 Well, first of all, was Genentech the party	19 retained by Genentech in a legal matter?	
20 that you were representing there?	20 A Yes.	
	21 Q And and what what did that involve?	
	22 A That involved similar to dealing with	
	23 patents. 24 Q And was it relating to the product	
<ul><li>Q Okay. Was the party the patent owner?</li><li>Well, strike that.</li></ul>	24 Q And was it relating to the product 25 Herceptin?	
25 Well, Strike that.	25 Herceptin:	
1 Was this a patent case?	1 A Other than this case?	
2 A It's such a long time ago, I can't I	2 Q Yes.	
3 don't actually remember the details of the case. I	3 A No.	
4 actually destroy the documents, and I destroy it from	4 Q Okay.	
5 my memory, too. So	5 A Not not that I remember.	
6 Q Fair enough.	6 Q Okay. So the other case that you worked	
7 Do you know what the issues were that you	7 with worked on with Genentech, what product was	
8 were giving an opinion on in that case?	8 involved in that case?	
9 A It had to do with epitopes on on a	9 A I can't remember what what those were.	
10 receptor.	10 Q Okay. Was was that in the U.S. or	
11 Q And was it relating to a therapeutic	11 somewhere else?	
12 product?	12 A U.S. Or those those are Brazilian	
13 A As far as I I recall, yes.	13 proceedings as well.	
14 Q Do you recall what the product was?	14 Q Okay. And when was this?	
15 A No.	15 A That's been ongoing for the last year or so.	
16 Q Okay. And you were deposed in that case?	16 Q Okay. And were you have you had a	
17 A Yes.	17 deposition taken in that case?	
18 Q Okay. Other than that case, have you ever	18 A No.	
19 been involved in a case in the district court or in	19 Q Okay. Other than in litigation or in the	
20 any court?	20 patent office, have you ever been retained by	
21 A No.	21 Genentech as a consultant?	
22 Q All right. Have you ever served as an	22 A Not to the not to my knowledge.	
23 expert witness previously in an action before the	23 Q Have you ever received funding from	
24 U.S. Patent and Trademark Office?	24 Genentech?	
25 A In what sense? I don't really	25 A Funding from personally or for my lab?	

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM



# Conducted on April 21, 2018

Conducted on	April 21, 2018
13	15
1 Q For your lab.	1 A I to the extent that I was required to
2 A No.	2 that I was required to for my deposition, yes for
3 Q Okay. And personally?	3 my declaration.
4 A No.	4 Q Okay. Do you know if there's any documents
5 Q Okay. The declarations	5 here that you didn't review completely?
6 I've handed you two documents, Dr. Wilson.	6 A "Completely" meaning
7 One is marked Exhibit 2041 in IPR2017-01488, and one	7 Q Like, read it from start to finish.
8 is marked Exhibit 2041 in IPR2017-01489.	8 A I think I've I've opened most of the
9 These are the two declarations that you've	9 documents, whether and and skimmed through
10 submitted in these proceedings?	10 them. I I can't there's so many documents
11 A I just wanted to make sure my signature is	11 here, I can't I can't recall every single document
12 on there.	12 that's in this particular list as to when I reviewed
13 Yes, they are.	13 it.
14 Q Okay. Is it fair to say that the two	14 Q Okay. Is it fair to say, though, if it's
15 declarations are substantively identical in terms of	15 listed here, it's something that you opened,
16 their content?	16 considered relevant enough to consider it, and place
17 A As far as I remember, yes.	17 it on your "Materials Considered" list?
18 Q Okay. At the time you signed them, you	18 MR. DANFORD: Objection to form.
19 believed them to be true and accurate to the best of	19 THE WITNESS: Most of the the things I
20 your knowledge; is that right?	20 I recognize, yes.
21 A Yes, I did.	21 BY MR. LASKY:
22 Q Okay. Is there anything that you now	22 Q Is there anything you're aware of that you
23 realize is was in error or that you want to	23 considered that's missing from this list?
24 change?	24 A Whoa.
25 A No. I I there's one or two typos,	25 Q And I guess I'm asking if you're aware of
14	
14	16
1 very minor things, a missing word, a missing comma, a	1 it.
<ul><li>very minor things, a missing word, a missing comma, a</li><li>missing exponent on the 9. But as far as substance</li></ul>	1 it. 2 A I'm not aware of any. I'd have to go
<ol> <li>very minor things, a missing word, a missing comma, a</li> <li>missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> </ol>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of
<ol> <li>very minor things, a missing word, a missing comma, a</li> <li>missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> </ol>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize
<ol> <li>very minor things, a missing word, a missing comma, a</li> <li>missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> <li>anything you see that you</li> </ol>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and
<ul> <li>very minor things, a missing word, a missing comma, a</li> <li>missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> <li>anything you see that you</li> <li>A Sure.</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes.
<ul> <li>very minor things, a missing word, a missing comma, a</li> <li>missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> <li>anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time
<ul> <li>very minor things, a missing word, a missing comma, a</li> <li>missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> <li>anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you
<ol> <li>very minor things, a missing word, a missing comma, a missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> </ol>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them.
<ul> <li>very minor things, a missing word, a missing comma, a</li> <li>missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> <li>anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case?
<ul> <li>very minor things, a missing word, a missing comma, a</li> <li>missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> <li>anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration?
<ul> <li>very minor things, a missing word, a missing comma, a</li> <li>missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> <li>anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted
<ul> <li>very minor things, a missing word, a missing comma, a</li> <li>missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> <li>anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> <li>Considered" list.</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have
<ul> <li>very minor things, a missing word, a missing comma, a missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> <li>Considered" list.</li> <li>Do you see that?</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have 14 submitted on
<ul> <li>very minor things, a missing word, a missing comma, a missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> <li>Considered" list.</li> <li>Do you see that?</li> <li>A Exhibit B?</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have
<ul> <li>very minor things, a missing word, a missing comma, a missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> <li>Considered" list.</li> <li>Do you see that?</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have 14 submitted on 15 A Many, many hours. 16 Q How many how many would you
<ul> <li>very minor things, a missing word, a missing comma, a missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> <li>Considered" list.</li> <li>Do you see that?</li> <li>A Exhibit B?</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have 14 submitted on 15 A Many, many hours. 16 Q How many how many would you 17 A I haven't added them up yet, but it would be
<ul> <li>very minor things, a missing word, a missing comma, a missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> <li>Considered" list.</li> <li>Do you see that?</li> <li>A Exhibit B?</li> <li>Q Exhibit B. Yes.</li> <li>A I see that.</li> <li>Q Okay. And did you review and consider each</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have 14 submitted on 15 A Many, many hours. 16 Q How many how many would you 17 A I haven't added them up yet, but it would be 18 tens of hours.
<ul> <li>very minor things, a missing word, a missing comma, a</li> <li>missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> <li>anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> <li>Considered" list.</li> <li>Do you see that?</li> <li>A Exhibit B?</li> <li>Q Exhibit B. Yes.</li> <li>A I see that.</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have 14 submitted on 15 A Many, many hours. 16 Q How many how many would you 17 A I haven't added them up yet, but it would be
<ul> <li>very minor things, a missing word, a missing comma, a missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> <li>Considered" list.</li> <li>Do you see that?</li> <li>A Exhibit B?</li> <li>Q Exhibit B. Yes.</li> <li>A I see that.</li> <li>Q Okay. And did you review and consider each</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have 14 submitted on 15 A Many, many hours. 16 Q How many how many would you 17 A I haven't added them up yet, but it would be 18 tens of hours.
<ul> <li>very minor things, a missing word, a missing comma, a missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> <li>anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> <li>Considered" list.</li> <li>Do you see that?</li> <li>A Exhibit B?</li> <li>Q Exhibit B. Yes.</li> <li>A I see that.</li> <li>Q Okay. And did you review and consider each</li> <li>of the documents in that "Materials Considered" list</li> <li>in each of your declarations?</li> <li>A I don't I don't remember every single one</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have 14 submitted on 15 A Many, many hours. 16 Q How many how many would you 17 A I haven't added them up yet, but it would be 18 tens of hours. 19 Q Tens of hours?
<ul> <li>very minor things, a missing word, a missing comma, a missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's</li> <li>anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> <li>Considered" list.</li> <li>Do you see that?</li> <li>A Exhibit B?</li> <li>Q Exhibit B. Yes.</li> <li>A I see that.</li> <li>Q Okay. And did you review and consider each</li> <li>of the documents in that "Materials Considered" list</li> <li>in each of your declarations?</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have 14 submitted on 15 A Many, many hours. 16 Q How many how many would you 17 A I haven't added them up yet, but it would be 18 tens of hours. 19 Q Tens of hours? 20 A Yeah. Uh-huh.
<ul> <li>very minor things, a missing word, a missing comma, a missing exponent on the 9. But as far as substance</li> <li>are concerned, no.</li> <li>Q Okay. Well, as we go through, if there's anything you see that you</li> <li>A Sure.</li> <li>Q need to change in terms of typos</li> <li>A Sure.</li> <li>Q please let me know.</li> <li>Now, at the back of each of your</li> <li>declarations, you will see that there is a list of</li> <li>the materials that well, it's a "Materials</li> <li>Considered" list.</li> <li>Do you see that?</li> <li>A Exhibit B?</li> <li>Q Exhibit B. Yes.</li> <li>A I see that.</li> <li>Q Okay. And did you review and consider each</li> <li>of the documents in that "Materials Considered" list</li> <li>in each of your declarations?</li> <li>A I don't I don't remember every single one</li> </ul>	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have 14 submitted on 15 A Many, many hours. 16 Q How many how many would you 17 A I haven't added them up yet, but it would be 18 tens of hours. 19 Q Tens of hours? 20 A Yeah. Uh-huh. 21 Q Less than 100?
1 very minor things, a missing word, a missing comma, a 2 missing exponent on the 9. But as far as substance 3 are concerned, no. 4 Q Okay. Well, as we go through, if there's 5 anything you see that you 6 A Sure. 7 Q need to change in terms of typos 8 A Sure. 9 Q please let me know. 10 Now, at the back of each of your 11 declarations, you will see that there is a list of 12 the materials that well, it's a "Materials 13 Considered" list. 14 Do you see that? 15 A Exhibit B? 16 Q Exhibit B. Yes. 17 A I see that. 18 Q Okay. And did you review and consider each 19 of the documents in that "Materials Considered" list 20 in each of your declarations? 21 A I don't I don't remember every single one 22 of them, but I recognize most of these, yes.	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have 14 submitted on 15 A Many, many hours. 16 Q How many how many would you 17 A I haven't added them up yet, but it would be 18 tens of hours. 19 Q Tens of hours? 20 A Yeah. Uh-huh. 21 Q Less than 100? 22 A I couldn't say if it was less than 100 or
1 very minor things, a missing word, a missing comma, a 2 missing exponent on the 9. But as far as substance 3 are concerned, no. 4 Q Okay. Well, as we go through, if there's 5 anything you see that you 6 A Sure. 7 Q need to change in terms of typos 8 A Sure. 9 Q please let me know. 10 Now, at the back of each of your 11 declarations, you will see that there is a list of 12 the materials that well, it's a "Materials 13 Considered" list. 14 Do you see that? 15 A Exhibit B? 16 Q Exhibit B. Yes. 17 A I see that. 18 Q Okay. And did you review and consider each 19 of the documents in that "Materials Considered" list 20 in each of your declarations? 21 A I don't I don't remember every single one 22 of them, but I recognize most of these, yes. 23 Q Okay. And you read and understood all of	1 it. 2 A I'm not aware of any. I'd have to go 3 through and and check, but I'm not aware of of 4 any. Most of the papers, of course, I recognize 5 right away, and 6 Yes. 7 Q Okay. Before I want to focus on the time 8 before you submitted your declarations up to when you 9 submitted them. 10 How much time did you spend on the case? 11 A Before I submitted the declaration? 12 Q Right. Up to the date that you submitted 13 the declaration. How much time would you have 14 submitted on 15 A Many, many hours. 16 Q How many how many would you 17 A I haven't added them up yet, but it would be 18 tens of hours. 19 Q Tens of hours? 20 A Yeah. Uh-huh. 21 Q Less than 100? 22 A I couldn't say if it was less than 100 or 23 more than 100, but it was a a large number of

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM



# DOCKET A L A R M

# 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.

