

ZYGMUNT J. HAAS, PH.D.

1

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioner,

v.

UNILOC LUXEMBOURG, S.A.

Patent Owner

---

IPR2017-01799

U.S. Patent No. 8,199,747

AND

IPR2017-01800

U.S. Patent No. 8,243,723

---

VIDEOTAPED DEPOSITION OF ZYGMUNT J. HAAS, PH.D.

Monday, June 4, 2018; 10:07 a.m.

Job No. 4332

Pgs. 1 - 121

Reported by: Cindy L. Sebo, RMR, CRR, RPR, CSR,

CCR, CLR, RSA, LiveDeposition Authorized Reporter

Complete Legal

214-746-5400

**ZYGMUNT J. HAAS, PH.D.**

1 Videotaped deposition of  
2 ZYGMUNT J. HAAS, PH.D., taken by the Patent  
3 Holder, held at the law offices of Paul Hastings  
4 LLP, 875 15th Street, Northwest, Washington, D.C.  
5 20005, before Cindy L. Sebo, Registered Merit  
6 Court Reporter, Certified Real-Time Reporter,  
7 Registered Professional Reporter, Certified  
8 Shorthand Reporter, Certified Court Reporter,  
9 Certified LiveNote Reporter, Real-Time Systems  
10 Administrator, LiveDeposition Authorized Reporter  
11 and Notary Public in and for the District of  
12 Columbia, beginning at approximately 10:07 a.m.,  
13 when were present on behalf of the respective  
14 parties:  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

Attorney for Petitioner:

PAUL HASTINGS LLP  
PHILLIP W. CITROËN, ESQUIRE  
MICHAEL A. WOLFE, ESQUIRE  
875 15th Street, Northwest  
Washington, D.C. 20005  
202.551.1991  
phillipcitroen@paulhastings.com  
michaelwolfe@paulhastings.com

Attorney for Patent Owner:

ETHRIDGE LAW GROUP  
BRETT MANGRUM, ESQUIRE  
2600 East Southlake Boulevard  
Suite 120-324  
Southlake, Texas 76092  
214.334.5497  
brett@ethridgelaw.com

ALSO PRESENT:

APRIL CARTER, Videographer

ZYGMUNT J. HAAS, PH.D.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

INDEX OF EXAMINATION

ZYGMUNT J. HAAS, PH.D.

EXAMINATION BY PAGE

Mr. Mangrum 9

- - -

INDEX TO EXHIBITS

- - -

DEPOSITION

EXHIBIT NUMBER DESCRIPTION PAGE

Exhibit 2008 Declaration of Dr. Zygmunt  
J. Haas 27

Exhibit 2009 Declaration of Dr. Zygmunt  
J. Haas 29

(Exhibits Attached to the Original Transcript.)

**ZYGMUNT J. HAAS, PH.D.**

5

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

ZYGMUNT J. HAAS, PH.D.

P R O C E E D I N G S

Washington, D.C.

June 4, 2018; 10:07 a.m.

THE VIDEOGRAPHER: Here begins  
Volume 1, Disc 1 in the video deposition  
of Dr. Zygmunt J. Haas, taken in the  
matter of Samsung Electronics America  
versus Uniloc Luxembourg S.A., in the  
Patent Trial and Appeal Board.

Today's date is June 4th, 2018.  
This deposition is being held at  
875 15th Street, Northwest,  
Washington, D.C. 20005.

The court reporter is Cindy Sebo,  
on behalf of DepoCam LLC. The video  
camera operator is April Carter, on  
behalf of DepoCam LLC.

Will counsel please introduce  
themselves and state whom they  
represent, beginning with the party  
noticing the deposition?

# 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.