

1 UNITED STATES PATENT AND TRADEMARK OFFICE  
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD  
3  
4 RUIZ FOOD PRODUCTS, INC., )  
5 )  
6 Petitioner, )  
7 )  
8 vs. ) CASE IPR2017-02018  
9 ) PATENT 9,429,659  
10 )  
11 MACROPOINT LLC, )  
12 )  
13 Patent Owner. )  
14 -----/  
15  
16 RUIZ FOOD PRODUCTS, INC., )  
17 )  
18 Petitioner, )  
19 )  
20 vs. ) CASE IPR2017-02016  
21 ) PATENT 8,275,358 .  
22 )  
23 MACROPOINT LLC, )  
24 )  
25 Patent Owner. )

16 THE DEPOSITION OF DAVID H. WILLIAMS  
17 THURSDAY, AUGUST 9, 2018

18 The deposition of DAVID H. WILLIAMS, called by  
19 the Petitioner for examination, taken before me,  
20 the undersigned, Sarah R. Drown, a Registered  
21 Professional Reporter and Notary Public within and  
22 for the State of Ohio, taken at the offices of  
23 Renner Otto, 1621 Euclid Avenue, Floor 19,  
24 Cleveland, Ohio, commencing at 9:07 a.m., the day  
25 and date above set forth.

HANNA & HANNA, INC.

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EXAMINATION	
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BY MR. MURPHY.....	4

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EXHIBIT	DESCRIPTION	PAGE
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1                                   DAVID H. WILLIAMS  
2 of lawful age, called by the Petitioner for  
3 examination, having been first duly sworn, as  
4 hereinafter certified, was examined and testified  
5 as follows:

6                                   EXAMINATION OF DAVID H. WILLIAMS

7 BY MR. MURPHY:

8 Q Good morning, Mr. Williams.

9 A Morning.

10 Q So, first, we are here today for two IPRS,  
11 IPR2017-02016 for U.S. Patent 8,275,358 and  
12 IPR2017-02018 for U.S. Patent 9,429,659.

13                                   You provided declarations related to  
14 those patents to submit in those IPR  
15 proceedings, right?

16 A Correct.

17 Q Just for the record, can you provide your full  
18 name?

19 A David Hilliard Williams.

20 Q If I refer to the two patents as the '358  
21 patent and the '659 patent, would you  
22 understand that?

23 A Yes.

24 Q Based on your CV, it looks like you've been  
25 deposed before. Is that right?

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1 A Correct.

2 Q Let me just go over some of the basics, then,  
3 even though you're probably already familiar  
4 with them.

5 Today I'll be asking you questions  
6 related to your declarations. You'll be  
7 answering them under oath.

8 Your testimony here has the same effect  
9 as if it was before the PTAB itself. Do you  
10 understand that?

11 A Yes, I do.

12 Q Your attorney may object to my questions, but  
13 unless he instructs you specifically not to  
14 answer, you still need to provide an answer to  
15 all of the questions.

16 A Okay.

17 Q If you don't understand any of my questions,  
18 please let me know and I'll try to rephrase it  
19 if I can.

20 A Okay.

21 Q If you need a break, let me know. I'll try to  
22 accommodate you as best as I can, but if  
23 there's still a question pending or a line of  
24 questions, I want to finish those beforehand.

25 A I will probably need a break roughly every hour

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