

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3 APPLE INC.,
4 Petitioner
5 v.
6 UNILOC LUXEMBOURG S.A.
7 Patent Owner.

9 ORAL DEPOSITION OF
10 WILLIAM EASTTOM
11 October 12, 2018

13 Case No. IPR2018-00294
14 U.S. Patent No. 6,736,759

18 ORAL DEPOSITION of WILLIAM EASTTOM, produced as a
19 witness at the instance of the Petitioner, and duly sworn,
20 was taken in the above-styled and -numbered cause on the
21 12th day of October, 2018, from 9:32 a.m. to 11:56 a.m.,
22 before Terralyn J. Gentry, Certified Shorthand Reporter
23 in and for the State of Texas, reported by machine
24 shorthand, at SpringHill Suites Dallas Rockwall, 2601
25 Lakefront Trail, Rockwall, Texas 75032.

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A P P E A R A N C E S

FOR THE PETIONER:

Mr. Adam P. Seitz
Mr. Chris R. Schmidt
ERISE IP
7015 College Boulevard, Suite 700
Overland Park, Kansas 66211
Telephone: (913) 777-5600
Facsimile: (913) 777-5601
E-mail: adam.seitz@eriseIP.com
E-mail: chris.schmidt@eriseIP.com

FOR THE PATENT OWNER:

Mr. Brett Mangrum
ETHERIDGE LAW GROUP
2600 East Southlake Boulevard, Suite 120/324
Southlake, Texas 76092
Telephone: (817) 470-7249
Facsimile: (817) 887-5950
E-mail: brett@etheridgelaw.com

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ALABAMA LITIGATION SERVICES

1 WILLIAM EASTTOM,
2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 BY MR. SEITZ:

5 Q. Dr. Easttom, good morning.

6 A. Good morning.

7 Q. Would you please state your name for the
8 record.

9 A. Williams Charles Easttom, II.

10 Q. And I see reference to a Chuck Easttom. Do you
11 go by "Chuck" sometimes?

12 A. It's short for my middle name. It's what my
13 parents started calling me when I was a child.

14 Q. Thank you, sir. I have just a couple of things
15 I want to cover with you today for how I would like to
16 conduct this deposition.

17 First, I want to make sure you understand
18 you're under oath.

19 A. Yes, I do.

20 Q. And then, second, if you answer my question,
21 I'm going to assume that you understand it; is that a
22 fair approach today?

23 A. Well, I can't tell you in advance what I'm
24 going to understand or what I'm not.

25 Q. But if you answer the question without asking

1 me to clarify, I'm going to assume that you understood
2 my question; is that fair?

3 A. I can't answer that at this point until we get
4 into the questions. I will try to bear in mind to ask
5 for clarification if there's any doubt, but I can
6 envision a possibility where I thought I understood you,
7 but it later turns out I did not.

8 Q. Okay. So sitting here today, there's no
9 assurance that you can give me that any question you
10 answer would be something that you understood then; is
11 that right?

12 A. No, that's not what I'm saying.

13 MR. MANGRUM: Objection.

14 Q. So help me understand what you're saying.

15 A. I have never met you before. I have no idea
16 how clear you are in your questions or how ambiguous, so
17 I can't possibly know if your questions will be clear or
18 not.

19 Q. All right.

20 MR. MANGRUM: Counsel, real quick, do you
21 want to do announcements?

22 MR. SEITZ: We probably should do that,
23 shouldn't we?

24 MR. MANGRUM: I didn't mean to throw you
25 off. Generally, at the beginning --

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