

EXHIBIT A

Intellectual Ventures I LLC

Exhibit 2022

ERICSSON v. IV I

IPR2018-00727

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

INTELLECTUAL VENTURES I LLC,
Plaintiff,

v. Civil Action No.
2:17-cv-577-JRG

T-MOBILE USA, INC., T-MOBILE
US, INC., ERICSSON INC.,
and TELEFONAKTIEBOLAGET LM
ERICSSON,
Defendants.

Attorneys' Eyes Only - Highly Confidential

ORAL DEPOSITION OF SYLVIA HALL-ELLIS, PH.D. produced as a witness and duly sworn, was taken in the above-styled and numbered cause on October 19, 2018, from 9:07 a.m. until 4:15 p.m., before Suzanne Kelly, CSR No. 1260, in and for the State of Texas, reported by stenographic method, at the Law Offices of Baker Botts located at 2001 Ross Avenue, Dallas, Texas 75201, pursuant to Federal Rules of Civil Procedure and the provisions stated on the record, if any.

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1 testimony? 09:12:11

2 A. Yes.

3 Q. When did they ask that? 09:12:18

4 A. I don't remember exactly. 09:12:26

5 Q. Did you provide such a list? 09:12:27

6 A. There is no such a list. 09:12:32

7 Q. Have you provided declaration testimony 09:12:37

8 in -- to the Patent Trial and Appeal Board in an 09:12:42

9 inter-parties review proceedings? 09:12:50

10 A. Can you clarify the question, please? 09:12:53

11 Q. Well, I should have started with this: 09:12:56

12 At any time today if there is a question you 09:13:00

13 don't understand, will you please let me know 09:13:03

14 that you have a problem with it? 09:13:07

15 A. Yes.

16 Q. Thank you. I'm not sure what part of 09:13:10

17 the question you didn't understand. So I will 09:13:15

18 ask it again. 09:13:17

19 A. Thank you. 09:13:19

20 Q. Have you ever -- or maybe I'll change 09:13:20

21 it. 09:13:23

22 Have you ever heard of an 09:13:24

23 inter-parties review trial? Sometimes they are 09:13:26

24 referred to as IPRs. 09:13:29

25 A. Yes. 09:13:32

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1 Q. Have you ever provided declaration 09:13:34
2 testimony in an IPR? 09:13:38
3 A. No. 09:13:41
4 Q. Have you ever provided a declaration in 09:13:47
5 an IPR? 09:13:50
6 A. Yes. 09:13:51
7 Q. And did you tell the Baker Botts 09:14:02
8 attorneys that you had not provided any trial 09:14:04
9 testimony? 09:14:09
10 MS. BUTLER: Objection; form. 09:14:10
11 THE WITNESS: Yes. 09:14:11
12 BY MR. ASHBROOK:
13 Q. Were you considering IPR trial 09:14:16
14 declarations when -- as trial testimony? 09:14:19
15 MS. BUTLER: Objection; form. 09:14:22
16 THE WITNESS: Yes. 09:14:23
17 BY MR. ASHBROOK:
18 Q. And you told the Baker Botts attorneys 09:14:26
19 that you hadn't provided any such testimony? 09:14:28
20 MS. BUTLER: Objection; form. 09:14:31
21 THE WITNESS: Yes. 09:14:32
22 BY MR. ASHBROOK:
23 Q. But, in fact, was you have provided 09:14:45
24 declarations in IPR trials? 09:14:46
25 MS. BUTLER: Objection; form. 09:14:49

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1 Q. An you provided it in an IPR proceeding; 09:17:58
2 right? 09:18:03
3 MS. BUTLER: Objection; form. 09:18:04
4 THE WITNESS: Yes. 09:18:06
5 BY MR. ASHBROOK: 09:18:06
6 Q. Now, did you inform the lawyers of Baker 09:18:11
7 Botts of the declaration that you made that's in 09:18:13
8 Exhibit 2? 09:18:15
9 MS. BUTLER: Objection; form. 09:18:16
10 THE WITNESS: I am not permitted to 09:18:20
11 disclose what I do to others without consent and 09:18:21
12 permission. And if I don't have it, I don't 09:18:26
13 disclose it. 09:18:29
14 BY MR. ASHBROOK:
15 Q. Are there any depositions that you have 09:18:30
16 done that you have not disclosed? 09:18:33
17 MS. BUTLER: Objection; form. 09:18:42
18 THE WITNESS: Other than today not 09:18:51
19 being on the list, no. 09:18:52
20 BY MR. ASHBROOK:
21 Q. Are there other declarations that you 09:18:57
22 have given in IPRs that you did not disclose? 09:19:00
23 MS. BUTLER: Objection; form. 09:19:04
24 THE WITNESS: This is my list of 09:19:15
25 depositions. This is not a list of declarations 09:19:16

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