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2 UNITED STATES PATENT AND TRADEMARK OFFICE
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD
4

5 ERICSSON, INC., and)
TELEFONAKTIEBOLAGET LM)
6 ERICSSON,)
Petitioners,) Case No.
7) IPR 2018-00727
)
8 vs.) Patent No.
) 6,628,629
9 INTELLECTUAL VENTURES I,)
LLC,)
10 Patent Owner.)
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15 DEPOSITION OF GHOBAD HEIDARI, PH.D.

16 Chicago, Illinois

17 Wednesday, April 3rd, 2019
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23 Reported by:

24 Amy M. Spee, CSR, RPR, CRR

25 Job No. 158684

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April 3rd, 2019
8:34 a.m.

Deposition of GHOBAD HEIDARI, PH.D.,
held at the offices of McAndrews Held &
Malloy, Ltd., 500 West Madison Street,
Suite 3400, Chicago, Illinois, pursuant to
notice, before Amy M. Spee, CSR, RPR, CRR.

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G. Heidari, Ph.D.
GHOBAD HEIDARI, P.H.D.,
called as a witness, having been duly sworn,
was examined and testified as follows:
CROSS-EXAMINATION BY
MR. BECKER:
Q. Good morning, Dr. Heidari.
How are you?
A. Good morning.
Q. Could you please state your full
name for the -- for the record.
A. Ghobad Heidari-Bateni.
Q. Could you spell that.
A. G-h-o-b-a-d, H-e-i-d-a-r-i dash
B-a-t-e-n-i.
Q. Where is your state of residence?
A. California.
Q. What city?
A. San Diego.
Q. Okay. Do you work in San Diego?
A. I work in San Diego.
Q. What do you do there?
A. I have a consulting firm in San
Diego.
Q. What is the name of it?

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APPEARANCES:

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ALSO PRESENT:
RUSS RIGBY, Intellectual Ventures

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G. Heidari, Ph.D.
A. GHB Services, LLC.
Q. What kind of consulting do you do?
A. Engineering consulting, IP
consulting.
Q. Do you consult with any bigger
companies?
A. Bigger?
Q. Like bigger companies than your own?
A. Oh, yeah, we do.
Q. What kind of companies do you
consult with engineering-wise?
A. Technology companies mostly, and --
and law firms.
Q. What kind of technologies do you
consult on?
A. We consult on a variety of high-tech
areas; wireless, semiconductors, you know, to
name a few.
Q. What kind of wireless have you
consulted on, say in the past three to five
years?
A. We have consulted, for example, on
mobile communication wireless technologies. We
have consulted on Bluetooth technology. We

1 G. Heidari, Ph.D.
 2 have consulted on Wi-Fi technology.
 3 Q. What kind of consulting -- I'm just
 4 trying to understand what -- what you actually
 5 offer. When you say "consulting," what do you
 6 actually do for these companies?
 7 A. Well, depending on their
 8 requirements, we offer, first of all, expertise
 9 in various technologies. If need be, we do
 10 also offer engineering services.
 11 Q. Do you provide design advice? Is it
 12 advice, or do you provide design services?
 13 A. We can do -- we offer both.
 14 Q. Okay. They just say, "Dr. Heidari,
 15 we've got this problem we're working on. We're
 16 trying to find a solution. Do you have any
 17 ideas?"
 18 Is that the kind of things that they
 19 would ask you?
 20 A. At a high level, of course that's
 21 what it is, yes.
 22 Q. Okay. Are there any nonconfidential
 23 companies you can provide the names of that
 24 you've done these types of services for in the
 25 last three to five years?

1 G. Heidari, Ph.D.
 2 A. I can't be sure. Most of our
 3 clients are requesting confidentiality.
 4 Q. You have an NDA with these
 5 companies?
 6 A. We have NDAs.
 7 Q. Can you give me an idea of how many
 8 companies you've consulted with in the last
 9 three to five years, let's say outside of the
 10 legal sphere and just in engineering?
 11 A. Probably several dozens.
 12 Q. And these engagements, are they for
 13 a certain number of hours, a certain -- like
 14 project-based? Like, how do you gauge whether
 15 you've completed your work for them?
 16 A. It depends on the scope of the
 17 project or the scope of the requirements.
 18 Sometimes it's hourly based, sometimes it's
 19 project-based.
 20 Q. Is LTE a technology that you've
 21 consulted on?
 22 A. It is.
 23 Q. In what area of LTE?
 24 A. What area of LTE?
 25 Q. Correct.

1 G. Heidari, Ph.D.
 2 A. What do you mean by "what area of
 3 LTE"?
 4 Q. Was it in the core network, for
 5 example?
 6 A. We have consulted on the core
 7 network. We have consulted on the area face
 8 side. We have consulted on base station side
 9 and handset side.
 10 Q. And were these -- can you give me an
 11 idea -- obviously I'm not trying to get into
 12 anything confidential, but just trying to
 13 understand the areas of LTE you've worked in.
 14 Would you be familiar with the terms
 15 "RAN1" and "RAN2" with respect to LTE?
 16 A. I -- I am familiar with the
 17 terminologies, if that's what you're asking.
 18 Q. Did you do any consulting in the
 19 area of RAN1 or RAN2 with respect to LTE?
 20 A. I believe we have. I'm not
 21 remembering exact -- exact scope at this
 22 moment.
 23 Q. Did you do any -- any consulting in
 24 the area of IP networking with respect to LTE?
 25 A. I believe we have.

1 G. Heidari, Ph.D.
 2 Q. Can you give me any more details on
 3 that or is it confidential?
 4 A. I can't possibly give you details on
 5 what we did for our clients, no.
 6 Q. Okay. Fair enough.
 7 In the last three to five years,
 8 have you done any consulting in the area of ATM
 9 networking, aside from this engagement with
 10 Intellectual Ventures?
 11 A. In the last three to five years?
 12 No.
 13 Q. Have you done any consulting in the
 14 area of ATM networking in the last five to ten
 15 years?
 16 A. No. ATM has -- has not been very
 17 popular, obviously, in the last ten years, so,
 18 no, we haven't.
 19 Q. Before we get into too much more, I
 20 think you've been deposed before, correct?
 21 A. Correct.
 22 Q. By our law firm?
 23 A. Correct.
 24 Q. And is this your third time to be
 25 deposed? Am I -- do I have the count right?

1 G. Heidari, Ph.D.
 2 A. This is my third time.
 3 Q. Okay. All the other -- the other
 4 two times were both with respect to engagements
 5 with Intellectual Ventures; is that correct?
 6 A. Mine have been with Intellectual
 7 Ventures.
 8 Q. Okay. And you understand the court
 9 reporter here is today to write down faithfully
 10 what's been said in the room?
 11 A. Correct.
 12 Q. And so all the answers -- the
 13 questions that I ask and the answers you give
 14 will be recorded, and the court reporter will
 15 swear that that's what she heard.
 16 You understand that?
 17 A. Exactly.
 18 Q. And do you understand that this
 19 transcript is not confidential?
 20 A. Correct.
 21 Q. And that it can and most likely will
 22 be filed publicly at the United States Patent
 23 and Trademark Office?
 24 A. Okay.
 25 Q. So your statements today will be

1 G. Heidari, Ph.D.
 2 Is that fair?
 3 A. I'm sorry. Can you repeat that?
 4 Q. I would ask that you do your best to
 5 answer the question I'm actually asking --
 6 A. Absolutely.
 7 Q. -- and not some other question you
 8 think might be asked or you think should be
 9 answered.
 10 A. Absolutely.
 11 Q. And you understand that IV's counsel
 12 is here today as well?
 13 A. I understand.
 14 Q. And they will have an opportunity
 15 after I'm done asking you questions to ask
 16 whatever questions they want to ask.
 17 A. Correct.
 18 Q. And is there anything that you want
 19 us to know about yourself, medically or any
 20 other reason, that you wouldn't be able to tell
 21 the complete truth today?
 22 A. None that I could think of.
 23 Q. Thank you.
 24 I'm going to hand you a document
 25 that the court reporter is going to mark as

1 G. Heidari, Ph.D.
 2 known to the public.
 3 A. Okay.
 4 Q. Is there any issue with that?
 5 A. I don't see any issue with that.
 6 Q. And you understand that I'm here to
 7 ask questions and you're here to give answers
 8 to the best of your ability, correct?
 9 A. Correct.
 10 Q. And I'm going to do my best to
 11 answer -- or I'm going to do my best to ask
 12 clear questions. If I use words you don't
 13 understand or you don't understand the
 14 question, you can ask for clarification.
 15 Do you understand that?
 16 A. Yes.
 17 Q. I may ask you what you don't
 18 understand about my question. I just ask for
 19 some latitude in helping me understand what it
 20 is you don't understand about my question.
 21 Is that fair?
 22 A. Okay.
 23 Q. And I would ask that you please do
 24 your best to answer the question that I'm
 25 actually asking as well.

1 G. Heidari, Ph.D.
 2 Exhibit 1.
 3 (Exhibit 1, LinkedIn profile, marked
 4 for identification.)
 5 MR. SCHODDE: Can I have a copy?
 6 MR. BECKER: Sure.
 7 MR. SCHODDE: Thank you.
 8 BY MR. BECKER:
 9 Q. I'll represent to you that this is
 10 something that our librarian pulled that we
 11 believe this is a copy of your LinkedIn profile
 12 that's publicly available.
 13 Can you confirm whether that's the
 14 case.
 15 A. (Document review.)
 16 It appears to be.
 17 Q. Is the LinkedIn profile something
 18 that you keep fairly up to date?
 19 A. I don't review or update frequently.
 20 Q. Can you tell me if there's anything
 21 here that's out of date, just looking through
 22 it? I'll give you a few minutes.
 23 A. (Document review.)
 24 Not -- not everything is obviously
 25 up to date, nor can I say that this is a

1 G. Heidari, Ph.D.

2 complete picture of everything I've done in the
3 past. Obviously, this is a sampling at the
4 time that I wrote it based on what I thought
5 would be important for my profile at the time
6 to be viewed by my potential clients.

7 Q. The things that are on here, are
8 they generally accurate?

9 A. Well, I mean --

10 Q. Does it -- does it give a general
11 picture of your educational and professional
12 experience?

13 A. (Document review.)

14 The education is accurate.

15 The list of employers I've worked
16 for are accurate, except that, for example,
17 where it says I worked for AT&T, that's the
18 latest, you know, incarnation of that company.
19 It used to be Ameritech Cellular, now it's
20 AT&T, so . . .

21 Q. It wasn't named AT&T when you worked
22 for them?

23 A. At the time, it wasn't, no. But
24 that's what it is now.

25 I worked for Nokia, but, I mean, you

1 G. Heidari, Ph.D.

2 can be more specific that I worked for Nokia
3 Mobile Phones. And there was different
4 divisions, and the -- I mean, I was hired by
5 Nokia Mobile Phones, not Nokia, the company.

6 Q. Sure.

7 A. So similar things like that are --
8 are obviously not a hundred percent precisely
9 reflected here.

10 Also, the content of my activities
11 within each of these obviously is a lot more
12 and longer than one -- one -- the couple of
13 sentences that you see here.

14 So all I can say is it is reflective
15 exactly of what -- everything I've done at
16 those companies.

17 Q. Do you keep a -- what's known as a
18 CV that's up to date?

19 A. I do have a -- sort of a CV in my
20 declaration that I'm sure you've seen.

21 Q. Correct.

22 I mean, the reason why I'm bringing
23 this LinkedIn is because your -- you don't have
24 a CV that you attached to your declaration.
25 There's some things typed into the declaration,

1 G. Heidari, Ph.D.

2 but there's no separate CV.

3 I'm just asking if you have a CV
4 that you keep up to date.

5 A. As of right now -- this moment?

6 Q. Correct.

7 A. I don't -- I don't have one with me.

8 Q. I'm not asking if you have it with
9 you. I'm saying is it something you generally
10 keep up to date as a professional?

11 A. I -- I don't necessarily send my CV
12 out anymore. The LinkedIn obviously is -- is
13 the main point of first contact with a lot of
14 our -- my clients or my customers.

15 So I'm not -- I can't be sure I have
16 an up-to-date CV. I did have a CV at some
17 point, yes.

18 Q. When you prepared your declaration
19 for this IPR, did you work from another
20 document that you -- that helped you remember
21 your experience, or did you type that in from
22 memory?

23 A. No, I mean, I looked at this
24 LinkedIn profile I have, and then -- I don't
25 recall exactly what -- what exactly I did at

1 G. Heidari, Ph.D.

2 the moment to recall everything, but this --
3 this was one of the potential sources I looked
4 at. I remember I -- wonder if there was
5 another source as well, but I can't recall.

6 MR. BECKER: Okay. I'm going to go
7 ahead and put in as Exhibit 2 your
8 declaration for this IPR.

9 (Exhibit 2, Ghobad Heidari's
10 declaration to IPR 2018-00727, marked for
11 identification.)

12 THE WITNESS: By the way, I have
13 this here. Did you want to take a look
14 or -- this contains --

15 Q. We can look at a break.

16 If you want to represent what's in
17 the binder in front of you.

18 A. Yes. The binder has notice of
19 deposition for this IPR; the '629 patent
20 document; the declaration of Dr. Haas for this
21 IPR; my declaration for this IPR; the reference
22 Exhibit 1004, or otherwise called the Dyson
23 reference; Exhibit 1005, or otherwise called
24 the Raychaudhuri, R-a-y-c-h-a-u-d-h-u-r-i,
25 reference; Exhibit 1008, or otherwise the

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