	June 07, 2019	
1	UNITED STATES PATENT AND TRADEMARK OFFICE	
2		
3	BEFORE THE PATENT TRIAL AND APPEAL BOARD	
4		
5	GOOGLE LLC, ) Patent No. 8,213,970	
6	Petitioner, )	
7	vs. )	
8	AGIS SOFTWARE DEVELOPMENT) LLC, )	
9	Patent Owner. )	
10	ratent Owner.	
11		
12	DEDOCTITION OF TAIME C. CARRONELL DA D.	
13	DEPOSITION OF JAIME G. CARBONELL, Ph.D.	
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1	DEPOSITION OF JAIME G.	
2	CARBONELL, Ph.D., a witness herein, called by	
3	the Petitioner, for examination, by and before	
4	Karen A. Nickel, a Certified Realtime Reporter	
5	and a notary public in and for the Commonwealth	
6	of Pennsylvania, at The Webb Law Firm, One	
7	Gateway Center, 420 Fort Duquesne Boulevard,	
8	Suite 1200, Pittsburgh, PA 15222, on Friday,	
9	June 7, 2019, at 9:10 a.m.	
10	COUNSEL PRESENT:	
11	For the Petitioner: Jonathan Tuminaro, Ph.D.	
12	Karen A. Wong-Chan, MEE  Sterne Kessler Goldstein	
13	& Fox 1100 New York Avenue, NW	
14	Washington, DC 20005	
15	Michael A. Berta, Esq. Arnold & Porter, LLP	
16	7th Floor Three Embarcadero Center	
17	San Francisco, CA 94111	
18	For the Patent Owner: Enrique W. Iturralde, Esq.	
19	Vincent J. Rubino, III, Esq.	
20	Brown Rudnick, LLP Seven Times Square	
21	New York, NY 10036	
22	Also Present: Jim Sherwood	
23		
24		
25		



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5	1	EXHIBITS	
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8	Exhibit 2 Exhibit 3	U.S. Patent No. 8,213,970 Declaration of David	19
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1	PROCEEDINGS
2	JAIME G. CARBONELL, Ph.D., a witness
3	herein, having been first duly sworn, was
4	examined and testified as follows:
5	EXAMINATION
6	BY MR. TUMINARO:
7	Q. Good morning, sir.
8	A. Good morning.
9	Q. Would you please state your full
10	name for the record?
11	A. It is Jaime, J-A-I-M-E, middle
12	initial G, last name Carbonell,
13	C-A-R-B-O-N-E-L-L.
14	Q. Great. I understand you have been
15	deposed before; is that right?
16	A. That's correct.
17	Q. Okay. I'm going to set a couple of
18	ground rules for this deposition; is that fair?
19	A. If the attorneys don't object, yes.
20	Q. Okay. So I'm going to be asking you
21	questions, as you know. So I'm going to need a
22	verbal answer to my questions.
23	Do you understand that?
24	A. Yes.
25	Q. I'm going to try to ask clear



1	questions, but if at any time you don't
2	understand one of my questions, will you let me
3	know?
4	A. Yes.
5	Q. If you answer one of my questions,
6	I'm going to assume that you understood it; is
7	that fair?
8	A. Yes.
9	Q. So I'm going to take periodic breaks
10	about once every hour, but if you need a break,
11	just let me know. Okay.
12	A. Okay.
13	Q. The one thing I'll ask, though, is
14	if there is a pending question, I ask that you
15	answer the question before we take a break.
16	Okay?
17	A. Okay.
18	Q. Do you understand that you are
19	testifying under oath here today?
20	A. Yes. This is what we just did.
21	Q. Is there any reason you can't do
22	that?
23	A. No.
24	Q. Okay. What did you do to prepare
25	for your deposition here today?



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