

1 HORST - IPR2018-01249

2 UNITED STATES PATENT AND TRADEMARK OFFICE

3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4 ---o0o---

5 APPLE INC.,

6 Petitioner,

7 vs.

Case IPR2018-01249

8 QUALCOMM INCORPORATED,

U.S. Patent No. 7,693,002

9 Patent Owner.

10  
11 \_\_\_\_\_

12  
13  
14 CONFIDENTIAL

15 DEPOSITION OF ROBERT W. HORST, PH.D.

16 VOLULME II

17 BELLEVUE, WASHINGTON

18 THURSDAY, AUGUST 8, 2019

19  
20  
21  
22  
23 Reported by:

24 DARCY J. BROKAW, RPR, CRR, CCR No. 3455

25 JOB NO. 165495

1 HORST - IPR2018-01249

2  
3  
4 AUGUST 8, 2019

5 8:57 A.M.  
6  
7

8 Deposition of ROBERT W. HORST, PH.D., Volume II, held  
9 at The Westin Bellevue, 600 Bellevue Way NE, Bellevue,  
10 Washington, before Darcy J. Brokaw, a Registered  
11 Professional Reporter, Certified Realtime Reporter,  
12 Washington Certified Court Reporter.  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 HORST - IPR2018-01249

2 APPEARANCE OF COUNSEL:

3

4 JONES DAY

5 Attorneys for the Patent Owner:

6 901 Lakeside Avenue

7 Cleveland, Ohio 44114

8 BY: DAVID COCHRAN, ESQ.

9

10

11

12 FISH & RICHARDSON

13 Attorneys for the Petitioner:

14 One Marina Park Drive

15 Boston, Massachusetts 02210

16 BY: WHITNEY REICHEL, ESQ.

17 KENNETH HOOVER, ESQ.

18

19

20

21

22

23

24

25

1 HORST - IPR2018-01249

2 ROBERT W. HORST, PH.D.,

3 called as a witness, having been duly sworn,  
4 was examined and testified as follows:

5 ---oOo---

6  
7 EXAMINATION

8 BY MR. COCHRAN:

9 Q. Good morning.

10 A. Good morning.

11 Q. Dr. Horst, you've seen you're under oath  
12 today?

13 A. Yes.

14 Q. Is there any reason you cannot testify  
15 truthfully today?

16 A. No.

17 Q. Great.

18 This first deposition that we're going to  
19 do today relates to your Supplemental Declaration  
20 testimony in IPR2018-01249. It relates to the '002  
21 patent.

22 Is that your understanding?

23 A. Yes.

24 Q. Great.

25 MR. COCHRAN: I'll hand the witness what

1 HORST - IPR2018-01249

2 has previously been marked as Exhibit 1013.

3 (Deposition Exhibit 1013 marked for  
4 identification.)

5 BY MR. COCHRAN:

6 Q. Do you recognize this document, Dr. Horst?

7 A. Yes. This is the Declaration for the '002  
8 that I submitted on July 13th.

9 Q. Can you take a look at page 22 of  
10 Exhibit 1013 and tell me if that is your signature  
11 on page 22.

12 A. Yes.

13 Q. Are there any errors that you're aware of  
14 in this document, Exhibit 1013, Dr. Horst?

15 A. There's nothing that I know of, but there  
16 could be some small typos and other things.

17 Q. Are there any opinions set forth in this  
18 document, Exhibit 1013, that you would like to  
19 change before we get started?

20 A. No. No, my opinions have not changed.

21 Q. Okay. Can you turn to page 3 of  
22 Exhibit 1013.

23 Are you at page 3?

24 A. Yes.

25 Q. Sorry, page 2.

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.