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ROBERT W. HORST, PH.D.  
UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD

Apple Inc.

Petitioner,

v.

Qualcomm Incorporated

Patent Owner

\_\_\_\_\_  
Cases IPR2018-01315; -0316  
U.S. Patent No. 8,063,674  
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CONFIDENTIAL

DEPOSITION OF ROBERT W. HORST, PH.D.

FRIDAY, MARCH 22, 2019

FISH & RICHARDSON

ONE MARINA PARK DRIVE

BOSTON, MASSACHUSETTS

Reported by: Sandra A. Deschaine, CSR, RPR, CLR, CRA

Job No: 157441

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ROBERT W. HORST, PH.D.

March 22, 2019

9:23 a.m.

Deposition of Robert W. Horst,  
Ph.D., held at Fish & Richardson, One Marina  
Park Drive, Boston, Massachusetts, pursuant  
to Notice, before Sandra A. Deschaine, a  
Shorthand Reporter, Registered Professional  
Reporter, Certified LiveNote Reporter, and  
Notary Public in and for the Commonwealth of  
Massachusetts.

1                   ROBERT W. HORST, PH.D.

2    A P P E A R A N C E S:

3

4                   JONES DAY

5                   Attorneys for the Patent Owner:

6                   901 Lakeside Avenue

7                   Cleveland, OH 44114

8                   BY:   DAVID COCHRAN, ESQ.

9

10                  FISH & RICHARDSON

11                  Attorneys for the Petitioner:

12                  One Marina Park Drive

13                  Boston, MA 02210

14                  BY:   WHITNEY REICHEL, ESQ.

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1 ROBERT W. HORST, PH.D.

2 ROBERT W. HORST, PH.D., Deponent,  
3 having first been satisfactorily identified  
4 by the production of her driver's license and  
5 duly sworn by the Notary Public, was examined  
6 and testified as follows:

7

8 EXAMINATION

9 BY MR. COCHRAN:

10 Q. Dr. Horst, welcome back.

11 A. Hello.

12 Q. Can you state your name and  
13 address for the record, sir?

14 A. Robert Horst, 182 Glenn Avenue in  
15 Santa Cruz, California.

16 Q. And you understand that you're  
17 under oath today, Dr. Horst?

18 A. Yes.

19 Q. Is there any reason you cannot  
20 testify truthfully today, sir?

21 A. No.

22 Q. Have you been deposed before?

23 A. Yes.

24 Q. When was the last time you were  
25 deposed?

1 ROBERT W. HORST, PH.D.

2 A. Two days ago.

3 Q. I had to do that just for fun. I  
4 assume you didn't have another deposition in  
5 between that one and today.

6 This deposition pertains to your  
7 declaration testimony in two IPR matters.  
8 Those matters are IPR Case IPR2018-01315;  
9 -01316.

10 Is that your understanding, sir?

11 A. Yes.

12 (Exhibit 1003, In the United States Patent  
13 and Trademark Office, Declaration of Robert  
14 W. Horst, Ph.D., previously marked.)

15 Q. The court reporter is handing you  
16 what's been previously marked as Apple 1003.

17 Do you recognize that document,  
18 Dr. Horst?

19 A. Yes, this is my expert report on  
20 the '674 patent.

21 Q. And you submitted this expert  
22 report or declaration in both matters:  
23 IPR2018-01315; -01316; is that correct?

24 A. That's correct.

25 Q. And as you mentioned, this

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