

1 HORST - IPR2018-01315; -01316

2 UNITED STATES PATENT AND TRADEMARK OFFICE

3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

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5 APPLE INC.,

6 Petitioner,

7 vs.

Cases IPR2018-01315; -01316

8 QUALCOMM INCORPORATED,

U.S. Patent No. 8,063,674

9 Patent Owner.

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14 CONFIDENTIAL

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

16 VOLULME II

17 BELLEVUE, WASHINGTON

18 THURSDAY, AUGUST 8, 2019

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22  
23 Reported by:

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

25 JOB NO. 165495

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AUGUST 8, 2019

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10:13 A.M.

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Deposition of ROBERT W. HORST, PH.D., Volume II,

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held at The Westin Bellevue, 600 Bellevue Way NE,

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Bellevue, Washington, before Darcy J. Brokaw, a

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Registered Professional Reporter, Certified Realtime

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Reporter, Washington Certified Court Reporter.

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2 APPEARANCE OF COUNSEL:

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4 JONES DAY

5 Attorneys for the Patent Owner:

6 901 Lakeside Avenue

7 Cleveland, Ohio 44114

8 BY: DAVID COCHRAN, ESQ.

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12 FISH & RICHARDSON

13 Attorneys for the Petitioner:

14 One Marina Park Drive

15 Boston, Massachusetts 02210

16 BY: WHITNEY REICHEL, ESQ.

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2 ROBERT W. HORST, PH.D.,

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

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6  
7 EXAMINATION

8 BY MR. COCHRAN:

9 Q. Dr. Horst, welcome back from the break.

10 A. Thank you.

11 Q. You understand you're still under oath?

12 A. Yes.

13 Q. I assume there's no reason you can't  
14 testify truthfully?

15 A. That's right.

16 Q. In between the last deposition and the  
17 five minutes starting this one.

18 This deposition pertains to your  
19 Supplemental Declaration testimony in IPR2018-01315  
20 and IPR2018-01316, both relating to the '674 patent.

21 Is that your understanding?

22 A. Yes.

23 MR. COCHRAN: I'm going to hand the  
24 witness what has been previously marked as  
25 Exhibit 1018 in IPR2018-01315.

1                   HORST - IPR2018-01315; -01316  
2                   (Deposition Exhibit No. 1018 marked for  
3                   identification.)

4 BY MR. COCHRAN:

5           Q.       Do you recognize this document?

6           A.       Yes. This is my Supplemental Declaration  
7           in the '674 patent.

8           Q.       Turn to page 40. Can you confirm that's  
9           your signature on page 40?

10          A.       Yes, this is my signature.

11                   I've also submitted a Corrective  
12          Declaration for one of the figures in this document.

13          Q.       Okay. I don't have that with me, so we're  
14          going to use this one.

15                   MR. COCHRAN: I'm also handing the witness  
16          what's been also marked as Exhibit 1018 in  
17          IPR2018-01316.

18 BY MR. COCHRAN:

19          Q.       I'm going to ask you to identify if you  
20          recognize that document, Dr. Horst.

21          A.       Yes. I see this is the same declaration  
22          for the '674 patent but filed for the other IPR in  
23          this case.

24          Q.       The two exhibits are identical, correct?

25                   MS. REICHEL: Objection to form.

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