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ATKINSON BAKER, INC.

Q. BY MR. ALEMANNI: Good morning. Is it Sacerdoti, Dr. Sacerdoti?

A. It's Sacerdoti but I respond to pretty much anything.

Q. Okay. I appreciate that. I'll try to get it right for the record, Sacerdoti. My name is John Alemanni. We haven't met before. I'm an attorney on behalf of Lenovo and I will be taking your deposition this morning. You realize you're under oath?

A. Yes, I do.

Q. So you understand that any answers you give here is just as if you were in a court or in front of the patent trial and appeal board; correct?

A. Yes.

MR. GOLDBERG: It's difficult for me to hear you, John. You're breaking up a little bit.

MR. ALEMANNI: Let's go off the record. Let me

25 see if I can attach the telephone.

1

1 (Recess taken.)

2 Q. BY MR. ALEMANNI : Okay. And so let me ask
3 you, Dr. Sacerdoti, have you been deposed before?

4 A. Yes, I have.

5 Q. Approximately how many times?

6 A. Well, my first deposition was in 1995, so
7 it's a little hard to give you an accurate number but I
8 would say on the record of 25.

9 Q. So you're familiar in general with how
10 depositions work; is that correct?

11 A. Yes, I am.

12 Q. Okay. So I'll ask you questions this
13 morning, your counsel may object. If they don't
14 instruct you not to answer however I'll expect you to
15 answer my question. If you're unable to understand me
16 particularly given the new world, we're so far apart,
17 if you would let me know I'd appreciate that. Is that
18 okay?

19 A. Yes, of course. If I don't understand I'll
20 ask for clarification.

21 Q. Perfect. And then if you don't ask for
22 clarification then I'll assume you understand my
23 question and that you are answering the question I
24 pose. Is that okay?

25 A. I understand.

2

1 Q. There any reason you can't give your best
2 testimony this morning?

3 A. No.

4 Q. Do you understand why you're here?

5 A. I haven't seen a summons or any particular
6 input from you as to why you asked to speak to me this
7 morning.

8 Q. So you have no idea why you're being
9 deposed?

10 A. I don't have a specific idea of why I'm
11 being deposed.

12 Q. Do you have a general understanding?

13 A. I understand it's in relation to the P tab
14 assessment of two patents.

15 Q. Okay. So there are two proceedings before
16 the patent trial and appeal board which is part of the
17 USPTO. They are IPR2019-1278 and IR2019-279. So there

18 are proceedings. Did you understand that there were
19 two proceedings, Dr. Sacerdoti?

20 A. Yes, I do.

21 Q. Okay. And do you understand that you're
22 testimony in the form of a declaration was submitted in
23 each of those proceedings?

24 A. Yes, I do.

25 Q. Okay. And so I intend to ask you questions

3

1 about those two declarations this morning. And those
2 declarations are marked Exhibit 2004 in each of the two
3 proceedings which may result in a little bit of
4 confusion. What I'll try to refer to either the
5 proceeding number or in some cases to the patent number
6 that's involved in each. Okay?

7 A. Okay.

8 Q. And the patent number as involved in the 78
9 proceeding is US patent number 802-0083. And if it's
10 okay would you I'll refer to it as the 083 patent. Is
11 that okay?

12 A. That's all right and if it's okay with you I
13 will do also.

14 Q. Yes, absolutely. And then the second
15 proceeding, the 1279 proceeding deals with US patent
16 number 8510407 and I'll refer to the 407 patent. And
17 with your declaration you submitted a curriculum vitae;
18 correct?

19 A. I submitted one with each of my
20 declarations.

21 Q. Okay. Is that CV up to date?

22 A. I believe it was as of the dates that they
23 were submitted. I also don't believe there's any
24 significant change to them since.

25 Q. Okay. And then the two declarations, is it

4

1 fair to say they're similar but not the same?

2 A. Well, they're certainly different. They
3 address different patents that have different
4 specifications so to the extent they're certainly
5 different.

6 Q. Okay. And you submitted a set of exhibits
7 with those declarations; correct?

8 A. Yes, I did.

9 Q. Are the exhibits that you submitted in
10 relation to the 083 patent identical to the exhibits

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