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DISCLAIMER

THIS IS A ROUGH DRAFT TRANSCRIPT. IT HAS BEEN TRANSLATED FROM STENO TO ENGLISH BY COMPUTER. THIS TRANSCRIPT HAS BEEN NEITHER EDITED NOR PROOFREAD BY THE COURT REPORTER.

ATKINSON BAKER, INC.

Deponent ,

having been first duly sworn, was examined and testified as follows:

Q. BY MR. ALEMANNI: Good morning. I apologize if I get the pronunciation right. Is it Ramde?

A. Yes, that's right.

Q. And is it Mr. or Doctor?

A. It's just Mr.

Q. I want to make sure I get that right. My name is John Alemanni. I'm an attorney with Kilpatrick Townsend in Raleigh, North Carolina here on behalf of Lenovo and are you -- do you know why you're here this morning?

A. Yes.

Q. And why is that?

A. It's part of the deposition -- the

25 deposition is part of the IPR that was filed and it's

1

1 part of that process I think.

2 Q. So there are two proceedings. The first  
3 proceeding is IPR2019-01278 and that concerns patent  
4 number 802-0083. And then there's a second IPR and  
5 that is IPR2019-01279 and the patent number at issue in  
6 that case is A510407. Both of these proceedings are  
7 between Lenovo and DoDots. Does that sound right to  
8 you?

9 A. Yes.

10 Q. And so you submitted declarations in both  
11 those proceedings; correct?

12 A. Correct.

13 Q. And do you have a copy of that declaration  
14 in front of you?

15 A. I do.

16 Q. Okay. And in both of the two different  
17 proceedings it's labeled Exhibit 2003. Do you see  
18 that?

19 A. Yes.

20 Q. So I'll refer to -- I'll probably just refer

21 to one of them but I'll refer to it as Exhibit 2003 or  
22 your declaration and those will mean the same thing.

23 Is that okay?

24 A. Okay.

25 Q. And are you familiar with referring to

2

1 patents by the last three digits?

2 A. I am.

3 Q. So if I say the 083 patent you'll understand  
4 what I mean?

5 A. Yes.

6 Q. Okay. Great. Have you been deposed before?

7 A. I have.

8 Q. About how many times?

9 A. I think twice.

10 Q. Twice. Okay. So you know generally how  
11 they run.

12 A. Yes.

13 Q. So you're under oath. You've already  
14 provided your direct testimony so this is  
15 cross-examination but you're under oath and you'll be  
16 answering my questions unless your counsel instructs  
17 you not to answer. He may object but if he objects but

18 doesn't instruct you not to answer I'll expect you to  
19 answer the questions. Is there any reason why you  
20 can't give your best testimony today?

21 A. No.

22 Q. One thing I will ask especially with the  
23 phone and video I'll try hard not to talk over you.  
24 I'd appreciate if you do the same. I apologize if I  
25 interrupt you. If you have any trouble understanding a

3

1 question please let me know and I'll either state it  
2 again or if I need to I can rephrase it. But if you  
3 don't understand me please ask me, please let me know  
4 you don't understand it and if you don't ask me to  
5 restate it or you don't tell me that you don't  
6 understand, then I'm going to assume you do understand  
7 it. Okay?

8 A. Okay.

9 Q. Okay. And so there are two declarations  
10 because there's two different proceedings. They are  
11 almost exactly the same. Is that your recollection as  
12 well?

13 A. The proceedings meaning the IPR proceedings

14 are the same?

15 Q. The two different IPR. You submitted two  
16 declarations but they're almost the same. Is that your  
17 recollection?

18 A. Yeah. My declarations -- my declarations  
19 are the same or the IPRs are the same?

20 Q. The declaration that you submitted in each  
21 of the two IPRs is essentially the same?

22 A. Yeah, they kind of cover the same material  
23 and information, yes.

24 Q. And did you review anything in preparation  
25 for your deposition?

4

1 A. I reviewed my declaration what I submitted.

2 Q. And your declaration includes exhibits;  
3 correct?

4 A. Yes.

5 Q. And did you review those as well?

6 A. Not -- just briefly. Just to make sure that  
7 I had them when I printed out the declaration, but  
8 yeah.

9 Q. And is it your understanding that the  
10 exhibits are the same for both declarations that are

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