

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE, INC.,                )
                             ) IPR2020-00905
      Petitioner,          ) IPR2020-00906
                             )
      vs.                  )
                             )
COREPHOTONICS, LTD.,       )
                             )
      Patent Owner.       )
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C O N F I D E N T I A L

Videotaped Deposition of Expert Witness

FREDO DURAND, Ph.D.

Tuesday, June 8, 2021 - 10:05 a.m. (EST)

Reported By:

Mayleen Ahmed, RMR, CRR, CRC, CSR

Job No.: 2491

TransPerfect Legal Solutions

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25 ALSO PRESENT: KIMBERLY VILLALOBOS, Videographer

1 INDEX OF EXAMINATION

2 WITNESS: FREDO DURAND, Ph.D.

3 EXAMINATION PAGE

4 BY MR. RUBIN 5

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7 MOTIONS TO STRIKE None

8 INSTRUCTIONS NOT TO ANSWER None

9 DOCUMENT/INFORMATION REQUESTS None

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----- REFERENCED DOCUMENTS -----

14

15 EXHIBIT DESCRIPTION PAGE

16

Exhibit 1001 U.S. Patent No. 10,225,479 43

17

Exhibit 1038 Declaration of Frédo Durand, Ph.D. (reply) 7

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19 Exhibit 2008 3/7/15 email chain to/from Townsend/Cohen re: Sample videos

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21 Exhibit 2015 Declaration of Duncan Moore, Ph.D. 11

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23 Exhibit 2001 Declaration of John C. Hart, Ph.D. 16

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1 DEPOSITION OF FREDO DURAND, Ph.D. - June 8, 2021

2 -----

3 THE VIDEOGRAPHER: We are on the record
4 on June 8, 2021, at 10:05 a.m. Eastern time for the
5 remote video deposition of Dr. Frédo Durand in the
6 matter of Apple, Incorporated versus Corephotonics
7 Limited.

8 My name is Kimberly Villalobos, and I'm
9 the videographer. All present will be noted on the
10 stenographic record.

11 Will the court reporter please swear in
12 the witness.

13 THE REPORTER: I'm going to ask that you
14 please raise your right hand.

15 Do you solemnly swear under penalty of
16 perjury that you are Dr. Frédo Durand, and the
17 testimony you are about to give in the matter now
18 pending shall be the truth, the whole truth, and
19 nothing but the truth?

20 THE WITNESS: Yes.

21 THE REPORTER: Thank you.

22 -----

23 FREDO DURAND, Ph.D.

24 having been duly sworn, testified as follows:

25 -----

1 EXAMINATION

2 BY MR. RUBIN:

3 Q. Good morning, Professor Durand.

4 A. Good morning.

5 Q. So this is not your first deposition
6 in an IPR between Apple and Corephotonics; is that
7 right?

8 A. That's correct.

9 Q. Do you know how many depositions you've
10 had so far in the -- in those IPRs?

11 A. I can't quite keep track because some of
12 them are multiple IPRs for the same deposition. But
13 I would say, is it the fifth one maybe?

14 Q. The fifth one, you said?

15 A. Yes. Although, as I said, I struggle to
16 keep track of numbers.

17 Q. Fair enough.

18 And do you know how many times you've
19 been deposed in total?

20 A. One more time in another case.

21 Q. Okay. So this would be roughly your
22 seventh deposition; is that right?

23 A. Possible, yes. In that range.

24 Q. Okay.

25 So I think you're familiar with the

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