

In the Matter Of:

Yita v

MacNeil IP

JOHN DAWSON

March 17, 2021



1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 _____
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4 _____
5 YITA, LLC
6 Petitioner,

7 v.

8 MACNEIL, IP LLC,
9 Patent Owner,

10 Case IPR2020-01142
11 Patent 8,833,834

12 ORAL DEPOSITION

13 JOHN E. DAWSON

14 MARCH 17, 2021

15
16 ORAL DEPOSITION OF JOHN E. DAWSON, via Zoom,
17 produced as a witness at the instance of the Patent
18 Owner and duly sworn, was taken in the above-styled and
19 numbered cause on March 17, 2021, from 9:25 a.m. to
20 10:28 a.m., before Melinda Barre, Certified Shorthand
21 Reporter in and for the State of Texas, reported by
22 computerized stenotype machine, all parties appearing
23 remotely via web videoconference, pursuant to the rules
24 of procedure and the provisions stated on the record or
25 attached hereto.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES
(ALL APPEARED VIA ZOOM VIDEO CONFERENCE.)

FOR PETITIONER:

Mr. Mark Walters
LOWE GRAHAM JONES
701 5th Avenue, Suite 4800
Seattle, Washington 98104

Telephone: 206.381.3300
E-mail: walters@lowegrahamjones.com

-and-

Mr. Tim Schaum
DASPIN & AUMENT LLP
227 West Monroe Street
Chicago, Illinois 60606

Telephone: 312.258.3792
E-mail: tschaum@daspinaument.com

FOR PATENT OWNER:

Mr. David G. Wille
BAKER BOTTS L.L.P.
2001 Ross Avenue, Suite 1900
Dallas, Texas 75201-2980

Telephone: 214.953.6595
E-mail: david.wille@bakerbotts.com

ALSO PRESENT: Kaley Woronicz, Document Technician

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX

PAGE

Examination by Mr. Wille	4
Signature Page	39
Court Reporter's Certificate	41

EXHIBITS

EXHIBIT	DESCRIPTION	PAGE
Exhibit 1005	Certification of Translation	13
Exhibit 2032	Dictionnaire Des Techniques Et Sciences Appliquées, Francais/Anglais	19
Exhibit 2033	Google Translation of the Word "Contour"	18
Exhibit 2036	Jinrong's Invalidity Contentions and Non-Infringement Contentions	32

1 JOHN E. DAWSON,
2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 QUESTIONS BY MR. WILLE:

5 Q. Okay. Good morning, Mr. Dawson. I'm David
6 Wille; and I am counsel for MacNeil, IP. With me is Tim
7 Shawm today.

8 MR. WILLE: Mr. Walters, just for clarity
9 on the record, we've agreed that this deposition is
10 going to be taken in both IPR2020-1139 and 2020-1142.
11 Is that correct?

12 MR. WALTERS: That is correct.

13 MR. WILLE: Okay. I think all the
14 exhibits today may be marked for the 1139, but we will
15 have parallel ones marked in the 1142 so that we can use
16 the same exhibit in both. Is that acceptable?

17 MR. WALTERS: That is. Thank you.

18 MR. WILLE: Okay.

19 Q. (By Mr. Wille) Returning to Mr. Dawson, please
20 state your name.

21 A. John Edwin Dawson.

22 Q. Mr. Dawson, where do you reside?

23 A. St. Louis, Missouri.

24 Q. And, Mr. Dawson, you translated the Rabbe
25 patent application for YITA in this IPR. Is that

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.