

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

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

DISH NETWORK L.L.C.,)
Petitioner,) Case No.
vs.) IPR202-01267
BROADBAND ITV, INC.,)
Patent Owner.) (Pages 1-72)
-----)

VIRTUAL VIDEOCONFERENCE
VIDEOTAPED DEPOSITION OF
LEIGHTON CHONG
WEDNESDAY, JULY 14, 2021
9:18 A.M.

REPORTED BY:
SUSAN NELSON
C.S.R. No. 3202
JOB NO. 4710284



1 Virtual videoconference videotaped deposition of
2 LEIGHTON CHONG, the witness, taken on behalf of
3 Petitioner, commencing at 9:18 A.M., on WEDNESDAY,
4 JULY 14, 2021, at Honolulu, Hawaii, before SUSAN
5 NELSON, C.S.R. No. 3202.

6

7 APPEARANCES OF COUNSEL (VIA VIDEOCONFERENCE)

8 FOR PETITIONER:

9 ORRICK HERRINGTON & SUTCLIFFE LLP

10 BY: WILL MELEHANI, ESQ.

11 The Orrick Building

12 Howard Street

13 San Francisco, California 94105-2669

14 (415) 773-5700

15 wmelehani@orrick.com

16

17 FOR PATENT OWNER:

18 FEINBERG DAY KRAMER ALBERTI LIM TONKOVICH

19 & BELLOLI LLP

20 BY: SAL LIM, ESQ.

21 577 Airport Boulevard

22 Suite 250

23 Burlingame, California 94010

24 (650) 825-4300

25 slim@feinday.com

Page 2

1 APPEARANCES (CONTINUED):

2

3 ALSO APPEARING (VIA VIDEOCONFERENCE)

4 PETER YAROSCHUK, VIDEOGRAPHER

5 DINA MARTIN, VERITEXT

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

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

I N D E X

WITNESS	EXAMINATION	PAGE
LEIGHTON CHONG		
	Cross-Examination by Mr. Melehani	6
	Redirect Examination by Mr. Lim	63
	Recross-Examination by Mr. Melehani	69

E X H I B I T S

NO.	PAGE	DESCRIPTION
Exhibit 1	20	Declaration of Leighton Chong (BBitV EX2037) (11 Pages)
Exhibit 2	41	BBitV Road Map, Milton Diaz (BBitV EX2063) (1 Page)
Exhibit 3	54	March 2004 Emails (BBitV EX2068) (1 Page)
Exhibit 4	63	System and Method for Managing, Converting Document (BBitV EX2061) (25 Pages)



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

HONOLULU, HAWAII;

WEDNESDAY, JULY 14, 2021;

9:18 A.M.

THE VIDEOGRAPHER: Good morning. We are on
the record at 9:18 a.m. on July 14th, 2021. This is
the video-recorded deposition of Leighton Chong.
My name is Peter Yaroschuk, here with our
court reporter Susan Nelson. We are here from
Veritext Legal Solutions at request of counsel for
Petitioner. The deposition is being held on a Zoom
video conference.

The caption of this case is DISH Network
L.L.C. versus Broadband iTV, Incorporated. Case
Number IPR 2020-01267.

Please note that audio and video recording
will take place unless all parties agree to go off
the record. Microphones are sensitive and may pick
up whispers, private conversations, and cellular
interference.

I am not related to any party in this
action, nor am I financially interested in the
outcome in any way. If there are any objections to
proceeding, please state them at the time of your
appearance, beginning with the noticing attorney.

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.