

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

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4 BAYERISCHE MOTOREN WERKE
5 AKTIENGESELLSCHAFT

6 & BMW OF NORTH AMERICA, LLC,
7 Petitioners,

8 v.

9 PAICE LLC & THE ABELL FOUNDATION, INC.,
10 Patent Owners.

11 -----
Case IPR2020-01386

12 Patent 7,237,634

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14 VIDEOTAPED DEPOSITION
15 OF MAHDI SHAHBAKHTI, Ph.D.

16 Conducted Virtually
17 Thursday, July 15, 2021

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24 Reported by:

Frank J. Bas, RPR

25 JOB NO. 195010

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July 15, 2021

9:00 a.m.

Videotaped Deposition of MAHDI
SHAHBAKHTI, Ph.D., held remotely with the
witness located in Edmonton, Alberta, Canada,
pursuant to Notice, before Frank J. Bas, a
Registered Professional Reporter and Notary
Public of the State of New York.

1 A P P E A R A N C E S:

2 (All attendees appearing via videoconference
3 and/or telephonically):
4

5 CROWELL & MORING
6 Attorneys for Petitioners
7 590 Madison Avenue
8 New York, NY 10022

9 BY: JACOB ZAMBRZYCKI, ESQ.
10
11

12 FISH & RICHARDSON
13 Attorneys for Patent Owner and the Witness
14 1000 Maine Avenue SW
15 Washington, DC 20024

16 BY: TIMOTHY RIFFE, ESQ.
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19

20 ALSO PRESENT:

21 PHIL RIZZUTI, Videographer
22
23
24
25

1 M. SHAHBAKHTI, Ph.D.

2 THE VIDEOGRAPHER: Good morning, 11:07:47
3 Counsel. My name is Phil Rizzuti. I am 11:09:39
4 a legal videographer in association with 11:09:42
5 TSG Reporting Inc. 11:09:46

6 Due to the severity of the COVID-19 11:09:51
7 and following the practice of social
8 distancing, I will not be in the same
9 room with the witness. Instead, I will
10 record this videotaped deposition
11 remotely.

12 The reporter, Frank Bas, also will
13 not be in the same room and will swear
14 in the witness remotely.

15 Do all parties stipulate to the
16 validity of this video-recording and the
17 remote swearing and that it will be
18 admissible in the courtroom as if it had
19 been taken following Rule 30 of the
20 Federal Rules of Civil Procedure and the
21 state's rules where this case is
22 pending? 11:10:25

23 MR. ZAMBRZYCKI: Yes, for BMW. 11:10:25

24 MR. RIFFE: And this is Tim Riffe. 11:10:28

25 Yes, for patent owner. 11:10:30

1 M. SHAHBAKHTI, Ph.D.

2 THE VIDEOGRAPHER: Thank you. 11:10:32

3 This is the start of media labeled 11:10:32

4 number 1 of the video-recorded 11:10:35

5 deposition of Dr. Mahdi Shahbakhti in 11:10:37

6 the matter of Bayerische Motoren Werke 11:10:42

7 Aktiengesellschaft & BMW of North 11:10:49

8 America, LLC versus Paice LLC & The 11:10:51

9 Abell Foundation, Inc. in the United 11:10:56

10 States Patent and Trademark Office 11:11:00

11 before the Patent Trial and Appeal 11:11:02

12 Board, Case No. IP -- IPR2020-01386. 11:11:07

13 This deposition is being held on 11:11:17

14 July 15, 2021 at approximately 9:11 a.m. 11:11:20

15 My name is Phil Rizzuti. I'm the 11:11:24

16 legal video specialist from TSG 11:11:27

17 Reporting Inc. The court reporter is 11:11:30

18 Frank Bas in association with TSG 11:11:31

19 Reporting. 11:11:34

20 Counsel, please introduce 11:11:34

21 yourselves. 11:11:36

22 MR. ZAMBRZYCKI: This is Jacob 11:11:37

23 Zambrzycki from Crowell & Moring on 11:11:40

24 behalf of BMW. 11:11:41

25 MR. RIFFE: Tim Riffe from Fish & 11:11:42

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