

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

UNIFIED PATENTS, LLC,)
)
 Petitioner,)
)
vs.) Patent No.
) 10,621,228
MEMORYWEB, LLC,)
)
 Patent Owner.) VOLUME I

The videoconference discovery deposition of BENJAMIN B. BEDERSON, Ph.D., taken in the above-entitled cause, before Renee E. Brass, a Certified Shorthand Reporter of said state, on May 24, 2022, at the hour of 9:40 a.m.

1 PRESENT:

2 UNIFIED PATENTS, LLC
3 BY: ELLYAR BARAZESH, ESQ.
4 ellyar@unifiedpatents.com
5 4445 Willard Avenue, Suite 600
6 Chevy Chase, MD 20815
7 925.434.8754

8 on behalf of the Petitioner;

9 NIXON PEABODY LLP
10 BY: MATTHEW A. WERBER, ESQ.
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12 70 West Madison Street, Suite 5200
13 Chicago, IL 60602
14 312.977.4458

15 on behalf of the Patent Owner.

16 ALSO PRESENT:

17 Brendan O'Callaghan
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I N D E X

EXAMINATION OF BENJAMIN B. BEDERSON	PAGE
MR. WERBER	4

E X H I B I T S

EXHIBIT NO.	PAGE REFERRED TO
Exhibit 1002	7
Exhibit 1001	10
Exhibit 1004	11
Exhibit 1005	11
Exhibit 2002	35
Exhibit 2003	37

NOTE: Exhibits 1001, 2002 and 2003 not
tendered for inclusion with transcript

1 (Witness remotely sworn.)

2 BENJAMIN B. BEDERSON, Ph.D.,
3 having been first duly sworn, was examined and
4 testified as follows:

5 EXAMINATION

6 BY MR. WERBER:

7 Q. Dr. Bederson, good morning. Can you
8 please state and spell your full name for the
9 record.

10 A. Yes. I am Benjamin B. Bederson, spelled
11 B-e-n-j-a-m-i-n, middle initial B, last name B like
12 boy, e, d like David, e-r-s-o, n like Nancy.

13 Q. Thank you. I'm showing you -- and I'm
14 now noticing the depo notice was misspelled.
15 Apologies.

16 I'm showing you I believe what was
17 paper 21 in the proceeding, notice of deposition of
18 Dr. Benjamin Bederson, and apologize for the
19 misspelling of the name. Have you seen this
20 document?

21 A. Yes, I have.

22 Q. This is a deposition notice asking you to
23 appear and testify under oath in relation to the
24 matter captioned at the top. Do you understand you
25 are here to testify about your opinions in this

1 matter?

2 A. Yes, I do.

3 Q. Do you understand you're here to provide
4 truthful and accurate answers in response to my
5 questions?

6 A. Yes, I do.

7 Q. And we both stipulated to the oath being
8 performed over Zoom. Do you understand that oath
9 just administered is the same oath used in a
10 courtroom in front of a judge and jury?

11 A. I don't know that, but I hear that you
12 are telling me that.

13 Q. Is there anything else you can think
14 of -- is there anything you can think of that may
15 prevent you today from hearing and understanding my
16 questions?

17 A. No.

18 Q. That's a no?

19 A. Correct. I said no.

20 Q. Is there anything else that you can think
21 of that may prevent you from testifying truthfully?

22 A. No.

23 Q. Dr. Bederson, here are a few instructions
24 so we are clear on the rules today. I'll do my best
25 to ask clear, direct questions that you are able to

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