

1 UNITED STATES PATENT AND TRADEMARK OFFICE

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3 BEFORE THE PATENT TRIAL AND APPEAL BOARD
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6 IPR2021-01549 (Patent 9,997,240 B2)

7 IPR2021-01547 (Patent 8,891,298 B2)

8 IPR2021-01548 (Patent 9,196,385 B2)1

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13 MICRON TECHNOLOGY, INC.,

14 Petitioner

15 v.

16 VERVAIN, LLC,

17 Patent Owner
18 _____
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21 REMOTE DEPOSITION OF DR. DAVID LIU

22 November 1, 2022

23 Job#: 219133

24 Reported by:

25 Bonnie Pruszynski, RMR

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November 1, 2022

8:00 a.m.

REMOTE DEPOSITION OF DR. DAVID

LIU, before Bonnie Pruszynski, CA Certified
Shorthand Reporter No. 13064, a Registered Merit
Reporter, Certified Livenote Reporter, and Notary
Public of the States of New York and Florida.

1 APPEARANCES:

2

3 For the Patent Owner:

4 MCKOOL SMITH

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7 BY: ARVIND JAIRAM, ESQ.

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9 For the Petitioner:

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13 BY: PARTH SAGDEO, ESQ.

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1 (Witness sworn.)

2 DAVID LIU,

3 called as a witness, having been first
4 duly sworn, was examined and testified
5 as follows:

6 EXAMINATION

7 BY MR. JAIRAM:

8 Q. Good morning, Dr. Liu.

9 A. Good morning.

10 Q. I know you've been in depositions
11 before, including in the cases that we are
12 going to discuss today, but I am still going
13 to go over some basic housekeeping
14 information regarding depositions so that the
15 record is complete. Okay?

16 A. Please.

17 Q. You understand you have been placed
18 under oath today just as though you were in
19 court?

20 A. Yes, I do.

21 Q. Do you understand that you are
22 bound to answer my questions truthfully
23 today?

24 A. Yes, I do.

25 Q. Are you aware of any reason that

1 you are unable to answer my questions
2 truthfully today?

3 A. No, I don't.

4 Q. And are you taking any medications
5 that would prevent you from providing honest,
6 accurate, and complete answers?

7 A. No, I'm not.

8 Q. Or any health conditions that would
9 prevent you from providing honest, accurate,
10 and complete answers?

11 A. No, I don't believe I do.

12 Q. Do you understand that you have to
13 answer my questions even if your counsel
14 objects, unless he directly instructs you not
15 to answer?

16 A. Yes, I do.

17 Q. I would also like to caution you
18 not to discuss the substance of your
19 testimony during your breaks. Okay?

20 A. Yes.

21 Q. Dr. Liu, is anyone in the room with
22 you today?

23 A. Only Parth, who is defending me in
24 this deposition.

25 Q. Do you have any documents with you

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