

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
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APPLE, INC.,

Petitioner,

-against-

MEMORYWEB, LLC,

Patent Owner.

Case Nos. PGR2022-00006
IPR2022-00031
IPR2022-00032
IPR2022-00033

-----X
DATE: December 1, 2022
TIME: 9:30 A.M.
VOLUME 1

REMOTE DEPOSITION of RAJEEV
SURATI, Ph.D., taken by the Petitioner,
held remotely via Zoom Videoconference,
before Suzanne Pastor, a Notary Public of
the State of New York.

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1 A P P E A R A N C E S:
(All appearances via Zoom)

2
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17 * * *

1 THE REPORTER: Good morning.
2 The attorneys participating in this
3 deposition acknowledge that I am not
4 physically present in the deposition
5 room and that I will be reporting
6 this deposition remotely.

7 They further acknowledge that
8 in lieu of an oath administered in
9 person, I will place the witness
10 under penalty of perjury.

11 The parties and their counsel
12 consent to this arrangement and waive
13 any objections to this manner of
14 reporting. Please indicate your
15 agreement by stating your name and
16 your agreement on the record.

17 MR. KUSHAN: Jeff Kushan from
18 Sidley Austin. We agree.

19 MR. SCHWARTZ: Dan Schwartz
20 from Nixon Peabody, we agree.

21 R A J E E V S U R A T I, called as a
22 witness, having been first duly sworn by a
23 Notary Public of the State of New York, was
24 examined and testified as follows:

25 MR. KUSHAN: Thank you.
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1 EXAMINATION

2 BY MR. KUSHAN:

3 Q. Dr. Surati, could you state
4 your name for the record.

5 A. My name is Rajeev Surati.

6 Q. And what is your current
7 position?

8 A. I am president of Skyline and
9 Nav AI, and I am also president of
10 Computation and Imaging.

11 Q. Have you been deposed before?

12 A. Yes, sir.

13 Q. How many times?

14 A. Somewhere between 20 and 30, or
15 maybe more than 30.

16 Q. So you're familiar with the
17 procedures used in depositions generally?

18 A. Generally I would say so.

19 Q. Okay, I'll just kind of go over
20 a few points. As you know, I'll be asking
21 you questions. Your counsel may raise
22 objections. Once the objection is
23 complete, you can proceed to answer my
24 question. The only time where you won't
25 respond to my question is if your counsel

1 directs you not to answer my question
2 because of a claim of privilege. And that
3 should be unusual.

4 If you have any questions about
5 my question, if you want me to recast it,
6 let me know. If there's anything you don't
7 understand about my question, let me know
8 and I'll try to give you a better question.

9 If at any point in this
10 process, if you need a break, just let me
11 know and we'll take the break as promptly
12 as we can at that moment. Obviously we'll
13 break if I have a question pending, but
14 just let me know when you need a break and
15 we can take the break.

16 Is there any reason you cannot
17 offer truthful testimony today?

18 A. There's no reason I cannot
19 offer truthful testimony today.

20 Q. Great. No medical issues that
21 would impair your ability to answer
22 questions truthfully and accurately today?

23 A. No, no medical issues.

24 Q. And you understand that you're
25 under oath or under affirmation in this

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