Page 1

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT AND APPEAL BOARD

APPLE INC.,

Petitioner,

V.

SCRAMOGE TECHNOLOGY LTD.,

Patent Owner.

Case IPR2022-00118

U.S. Patent No. 10,804,740

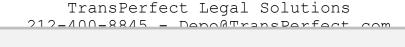
REMOTE DEPOSITION OF

JOSHUA PHINNEY, Ph.D., P.E.

Wednesday, July 27, 2022

9:50 a.m. Pacific Time

Stenographically Reported By: Lorie Rhyne, CSR No. 12905 Job No. 5237





Pa	ge 2 Page 3
DEPOSITION OF: JOSHUA PHINNEY, Ph.I DATE: Wednesday, July 27, 2022 TIME: 9:50 a.m. Pacific Time LOCATION: Conducted remotely with all parties appearing via Zoom parties appearing via Zoom parties appearing via Zoom	2 3 APPEARING FOR PETITIONER: 4 SCOTT JARRATT, ESQ. 5 CALMANN J. CLEMENTS, ESQ. 6 Haynes Boone, LLP 7 6000 Headquarters Drive, Suite 200 8 Plano, Texas 75024 9 (972) 739-8663 10 scott.jarratt@haynesboone.com 11 calmann.clements@haynesboone.com 12 13 APPEARING FOR PATENT OWNER: 14 ANTONIO PAPAGEORGIOU, ESQ. 15 Lombard & Geliebter LLP
16 17 18 19 20 21 22 23 24	230 Park Avenue, 4th Floor West New York, New York 10169 (212) 520-1172 19 ap@lgtrademark.com 20 21 22 23 24 25
Pa 1 INDEX 2 WITNESS: EXAMINA 3 Joshua Phinney 4 Mr. Papageorgiou 5 5 Mr. Jarratt 63 6 7 8 EXHIBIT(S) MARKED	TION 2 9:50 a.m. Pacific Time JOSHUA W. PHINNEY, Ph.D., P.E., having first been duly sworn, was examined and testified as follows: TEST STATES OF THE STAT
9 EXHIBIT PAGE 10 Exhibit 1001 U.S. Patent 10,804,740 11 Exhibit 1002 U.S. Patent 10,804,740 12 File History 6 13 Exhibit 1003 '740 Phinney Declaration 14 Exhibit 1004 Phinney CV 7 15 Exhibit 1005 Patent Application Pub. No.: 16 US 2009/0021212 A1 (Hasegawa) 17 Exhibit 1006 Patent Application Pub. No.: 18 US 2007 /0069961 AI (Akiho) 7 19 Exhibit 1007 Patent Application Pub. No.: 20 US 2014/0306656 AI (Tabata) 21 Exhibit 1008 U.S. Patent US 8,384,263 22 (Hiramatsu) 8	19 Number 10,804,740.

2 (Pages 2 to 5)

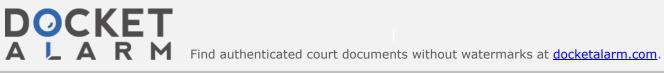
TransPerfect Legal Solutions
212-400-8845 - DepoMTransPerfect com



	Page 6		Page 7
1	BY MR. PAPAGEORGIOU:	1	(Exhibit 1004 was marked for identification.)
2	Q. The so you prepared a declaration marked	2	BY MR. PAPAGEORGIOU:
3	Exhibit 1003; is that correct?	3	Q. And Exhibit 1004, that is your CV; is that
4	A. Yes.	4	correct?
5	Q. Okay. And this is the document on screen	5	A. Yes.
6	right now; is that correct?	6	(Exhibit 1005 was marked for identification.)
7	A. Yes, that looks like it.	7	BY MR. PAPAGEORGIOU:
8	Q. Okay, great.	8	Q. Do you recognize Exhibit 1005?
9	(Exhibit 1001 was marked for identification.)	9	A. Yes, this is Hasegawa, which is the
10	BY MR. PAPAGEORGIOU:	10	the the reference for the the ground in the
11	Q. And in addition to Exhibit 1003, there's	11	petition.
12	also Exhibit 1001.	12	Q. Okay.
13	(Calmann Clements joins proceedings.)	13	(Exhibit 1006 was marked for identification.)
14	BY MR. PAPAGEORGIOU:	14	BY MR. PAPAGEORGIOU:
15	Q. Let me get the front page there.	15	Q. And this document shown on the screen right
16	Do you recognize that document?	16	now is marked Exhibit 1016 [sic].
17	A. Yes. It's the '740 patent.	17	Do you recognize this?
18	Q. Great.	18	A. I do. I I call it Akiho.
19	(Exhibit 1002 was marked for identification.)	19	Q. That's fair enough.
20	BY MR. PAPAGEORGIOU:	20	(Exhibit 1007 was marked for identification.)
21	Q. Exhibit this is Exhibit 1002 shown on the	21	BY MR. PAPAGEORGIOU:
22	screen right now.	22	Q. And there's a also Exhibit 1007 shown on
23	Do you recognize that document?	23	screen now.
24	A. Yes, the the file history for the	24	Do you recognize this?
25	'740 patent.	25	A. Yes. I I call this Tabata.
	Page 8		
	rage o		Page 9
1	(Exhibit 1008 was marked for identification.)	1	Page 9 type that could be trade secrets or patents.
1 2	_	1 2	
	(Exhibit 1008 was marked for identification.)		type that could be trade secrets or patents.
2	(Exhibit 1008 was marked for identification.) BY MR. PAPAGEORGIOU:	2	type that could be trade secrets or patents. Q. Have you been retained for this particular
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3 (Pages 6 to 9)

TransPerfect Legal Solutions



	Page 10		Page 11
1	35 U.S.C. 102?	1	A. That all of the elements would be obvious to
2	A. I I have.	2	a a person of ordinary skill at the time of the
3	Q. How did you become aware of the standard for	3	invention.
4	anticipation? Did you read any cases, for example?	4	Q. Right. So it's it's a combination of
5	A. No, I I don't read cases. I tend to have	5	of references plus a rational basis for combining those
6	a a section of any report I do on a patent matter, a	6	references to yield the claimed invention; is that
7	section I usually just call Legal Understanding and,	7	correct?
8	you know, it just has a lot of paragraphs that say,	8	A. Well, if I could look at my
9	I've been informed by counsel that, and that just	9	O. Sure.
10	reflects what I what I learned in the course of	10	A Legal Understanding section here.
11	doing this type of work about anticipation and	11	I'll just so I I think you asked a
12	obviousness.	12	question about obviousness, and then you asked if
13	Q. So it's fair to say that, basically, you've	13	your your way you said it was was correct, I
14	learned about obviousness and anticipation based on	14	believe.
15	what you've been told by counsel?	15	Q. Okay. That's fine.
16	A. Yeah, I think that's that's a fair way to	16	Now, would you agree that it's not enough to
17	put it.	17	merely show that components are in the prior art to
18	Q. Okay. Now, in this particular case here in	18	prove obviousness.
19	your declaration, we're principally concerned with	19	Would you agree?
20	obviousness; is that correct?	20	A. Well, I I tried to end the end my
21	A. Correct.	21	analysis in each of each claim element with a
22	Q. Now, what in terms of obviousness, you	22	concluding sentence that would say it would say
23	understand that, in essence, that the requirement to	23	something to the effect of, you know, Thus, this
24	show that the the claim is obvious requires that all	24	teaching would render would render obvious the claim
25	of the elements be in the prior art; is that correct?	25	element.
	1 ,		
	Page 12		Page 13
	Page 12		Page 13
1	And, so, yeah, I I basically would show	1	statement. That's that concluding statement that I
2	And, so, yeah, I I basically would show some, you know, reasons from from Hasegawa and then	2	statement. That's that concluding statement that I have at the end of every claim element.
2	And, so, yeah, I I basically would show some, you know, reasons from from Hasegawa and then conclude with that type of sentence, that that	2	statement. That's that concluding statement that I have at the end of every claim element. Q. Okay. So to confirm, you did not conclude
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4 (Pages 10 to 13)

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	Page 14		Page 15
1	'740 patent.	1	is at least your statement is not prior art?
2	Do you see that?	2	A. I I guess in the sense of being a
3	A. Yes.	3	reference that I'm relying on affirmatively defined
4	Q. All right. You understand that this	4	claim elements, I I guess I'd agree with you that
5	paragraph is not prior art; is that correct?	5	way.
6	MR. JARRATT: Objection. Form.	6	Q. Okay. At paragraph 32, you indicate that
7	BY MR. PAPAGEORGIOU:	7	the listed elements there are well-known components; is
8	Q. Let me rephrase.	8	that correct?
9	So that paragraph that you quote from the	9	A. Yes, that's what I say there.
10	'740 patent, do you understand that that passage is not	10	Q. Okay. Now, again, in terms of obviousness,
11	prior art?	11	it's not enough that the components themselves are
12	A. I guess I'm not quite sure how to answer	12	well-known; is that correct?
13	because I have heard something called Apple can	13	A. That makes sense to me, that it's not just
14	admitted prior art where statements that a patent owner	14	finding certain things in isolation is, in a way, not
15	might make talking about the state of the art at the	15	enough. The the so at least in that sense.
16	time, sort of, are are taken to reflect in a way	16	Q. Okay. Going a little further down to
17	what was the prior art.	17	paragraph 35, you note that The specification does not
18	So I'm not I guess I'm not quite sure how	18	provide additional details with respect to these
19	to answer your question.	19	spatial relationships between the connecting unit and
20	Q. Okay. Well, we'll move on to the next	20	the receiving space in the adhesive layer 710.
21	paragraph.	21	Do you see that? A. Yes.
22 23	In that paragraph 28, you refer to more recent devices?	23	
24	A. Yes.	24	Q. Okay. You do you understand that the specification itself is not the only part of the patent
25	Q. All right. And that's not prior art either	25	disclosure?
	(g		
	- 10		
	Page 16		Page 17
1	_	1	Page 17 A. Yeah, that's my memory. I can check if we
1 2	A. Yes. My understanding is that the disclosure also includes the file history as an	1 2	-
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2	A. Yes. My understanding is that the disclosure also includes the file history as an	2	A. Yeah, that's my memory. I can check if we want to be sure.
2	A. Yes. My understanding is that the disclosure also includes the file history as an example.	2	A. Yeah, that's my memory. I can check if we want to be sure. Q. Okay. No, that that is correct.
2 3 4	 A. Yes. My understanding is that the disclosure also includes the file history as an example. Q. Do you understand that the drawings themselves are part of the disclosure? A. Yeah. My understanding is that that the 	2 3 4	 A. Yeah, that's my memory. I can check if we want to be sure. Q. Okay. No, that that is correct. And 130 is the receiving space. Do you see that? A. That is my that is my recollection. I'm
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