

# Deposition Transcript

Case Number: IPR2022-00311

Date: August 18, 2022

In the matter of:

## SAMSUNG ELECTRONICS CO. LTD., et al. v MYPAQ HOLDINGS LTD.

### DR. SAYFE KIAEI - PART A

**CERTIFIED  
COPY**

Reported by:

Mary Ann Payonk  
CSR No. 13431

Steno

Official Reporters

315 W 9th St.  
Suite 807

Los Angeles, CA 90015  
concierge@steno.com  
(310) 573-8380



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

---

Samsung Electronics Co., Ltd. and Dell Technologies Inc.  
Petitioners  
v.  
Mypaq Holdings Ltd.  
Patent Owner

---

Case No. IPR2022-00311  
U.S. Patent No. 8,477,514

---

DEPOSITION OF DR. SAYFE KIAEI  
TAKEN REMOTELY BY VIDEOCONFERENCE  
August 18, 2022

Reported by: Mary Ann Payonk  
Job No. 311944(a)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

August 18, 2022  
11:00 a.m.

Deposition of DR. SAYFE KIAEI taken remotely by  
videoconference pursuant to Notice and agreement of  
counsel, stenographically reported by Mary Ann Payonk,  
Shorthand Reporter and Notary Public, CA CSR No. 13431.

All attorneys participating in this deposition  
acknowledge that the reporter is not physically present  
in the deposition room and there is no objection to the  
oath being administered remotely.

1 APPEARANCES :

2 ON BEHALF OF SAMSUNG ELECTRONICS CO. LTD. :  
3 NEIL SIROTA, ESQ.  
4 neil.sirota@bakerbotts.com  
5 FRANK ZHU, ESQ.  
6 frank.zhu@bakerbotts.com  
7 BAKER BOTTS  
8 30 Rockefeller Plaza  
9 New York, New York 10112  
10

11  
12 ON BEHALF OF MYPAQ HOLDINGS LTD. :  
13 STEPHEN McBRIDE, ESQ.  
14 stevemcbride@carmichaelip.com  
15 8000 Towers Crescent Drive, 13th Floor  
16 Tysons, VA 22182  
17

18 ON BEHALF OF DELL TECHNOLOGIES, INC. :  
19 BRETT J. THOMPSEN, ESQ.  
20 bthompson@mwe.com  
21 PAULA HEYMAN, ESQ.  
22 pheyman@mwe.com  
23 McDERMOTT WILL & EMERY  
24 111 Congress Avenue, Suite 500  
25 Austin, TX 78701

ALSO IN ATTENDANCE :

Tom Brown, Dell Technologies  
Bailey Watkins, Dell Technologies

18  
19  
20  
21  
22  
23  
24  
25

11:27 1 ATTORNEY SIROTA: Before we begin the  
11:27 2 questioning, just to put on the record something that we  
11:27 3 talked about off record before, as far as defending the  
11:27 4 deposition, Brett Thompsen, who represents Dell, will be  
11:27 5 doing that. There are attorneys here for Samsung as  
11:28 6 well, and we've agreed that objections made by  
11:28 7 Mr. Thompsen would be applicable to Samsung as well so  
11:28 8 Samsung need not repeat the objections on the record.

11:28 9 ATTORNEY McBRIDE: And I want to just clarify  
11:28 10 that this transcript covers IPR2022-00311. Depending on  
11:28 11 what happens here, we may use this in IPR2022-00312.  
11:28 12 And we should probably discuss once we wrap up here and  
11:28 13 try to get on the record whether or not this transcript  
11:28 14 is agreed to be able to be used in the 312.

15 SAYFE KIAEI,

16 called as a witness, having been duly  
17 sworn, was examined and testified as  
18 follows:

19 EXAMINATION

11:28 20 BY ATTORNEY McBRIDE:

11:28 21 Q. Good morning, Dr. Kiaei. How are you?

11:28 22 A. Good morning, Mr. McBride. I'm doing great.  
11:28 23 How are you?

11:28 24 Q. I'm doing well.

11:28 25 Did I pronounce your name right?

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.