

Deposition Transcript

Case Number: IPR2022-00312

Date: August 18, 2022

In the matter of:

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

DR. SAYFE KIAEI - PART B

**CERTIFIED
COPY**

Reported by:

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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. IPR2022-00312
U.S. Patent No. 7,675,759

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

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

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August 18, 2022

6:40 p.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.

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ALSO IN ATTENDANCE :

Tom Brown, Dell Technologies
Bailey Watkins, Dell Technologies

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06:42 1 ATTORNEY McBRIDE: On the record, this is the
06:42 2 deposition for the IPR2022-00312 IPR covering the '759
06:43 3 patent. The parties have agreed that the earlier
06:43 4 transcript for the '514 patent can be used in this one.
06:43 5 And I think we would take the position that we should be
06:43 6 able to use this transcript in the earlier proceeding
06:43 7 for the '514. And I think petitioner is taking the
06:43 8 other position, that we should not be able to. I don't
06:43 9 know, petitioner, if there's any clarification that you
06:43 10 want to add.

06:43 11 ATTORNEY HEYMAN: For Dell, as long as the
06:43 12 patent owner reduces the amount of time that it's taken
06:43 13 for the '759 deposition, we can agree that the '514
06:43 14 transcript can be used in the '759 deposition, or '759
06:43 15 IPR.

06:44 16 ATTORNEY SIROTA: And for the record, Samsung
06:44 17 would agree with that. It sounds like that will not be
06:44 18 an issue and that the second deposition of the day will
06:44 19 be -- will take less time than the first one because we
06:44 20 are agreeing that the first one can be used in the
06:44 21 second. So with that, I think we're set.

06:44 22 ATTORNEY McBRIDE: I just want to clarify that
06:44 23 I think we are going to get done in a couple hours, but
06:44 24 if for some reason it runs late, we're not agreeing not
06:44 25 to use the earlier transcript. But let's get to the end

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