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2	UNITED STATES PATENT AND TRADEMARK OFFICE
3	BEFORE THE PATENT TRIAL AND APPEAL BOARD
4	
5	ASSA ABLOY AB, ASSA ABLOY INC., ASSA ABLO RESIDENTIAL GROUP, INC., AUGUST HOME, INC., HID
6	GLOBAL CORPORATION, ASSA ABLOY GLOBAL SOLUTIONS, INC.,
7	Petitioners,
8	v. Case IPR2022-01006 Case IPR2022-01045
9	Case IPR2022-01089
10	CPC PATENT TECHNOLOGIES PTY LTD.,
11	Patent Owner.
12	
13	REMOTE DEPOSITION OF
14	SAMUEL RUSS, PH.D.
15	May 4, 2023
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22	Stenographically Reported by: Bonnie Pruszynski, RMR, CA CSR No. 13064
23	Job No. J9626891
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4	May 4, 2023
5	9:00 a.m. PST
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8	REMOTE DEPOSITION OF SAMUEL
9	RUSS, PH.D., before Bonnie Pruszynski, CA
10	Certified Shorthand Reporter No. 13064, a
11	Registered Merit Reporter, Certified Livenote
12	Reporter, and Notary Public of the States of New
13	York and Florida.
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1	S. Russ	
2	(Witness sworn.)	
3	SAMUEL RUSS, PH.D.,	
4	called as a witness, having been first	
5	duly sworn, was examined and testified	11:48
6	as follows:	
7	EXAMINATION	
8	BY MR. DEVKAR:	
9	Q. Good morning, Dr. Russ.	
10	A. Good morning.	11:59
11	Q. Can you please state your full name	
12	for the record.	
13	A. Samuel Hardie Russ. That's	
14	H-A-R-D-I-E.	
15	Q. Have you ever had your deposition	11:59
16	taken before?	
17	A. Yes, I have.	
18	Q. Approximately how many times?	
19	A. I would say approximately 40 times.	
20	Q. Okay. So, you are probably pretty	11:59
21	familiar with the deposition process, but I	
22	will just briefly express a few ground rules	
23	that you probably know well.	
24	The first is that we should do our	
25	best not to talk over one another so that the	11:59





1	S. Russ	
2	court reporter can accurately record what	
3	each person is saying. Does that sound all	
4	right?	
5	A. Yes.	11:59
6	Q. If you don't understand a question,	
7	would you please let me know? Otherwise, I	
8	will assume that you do understand the	
9	question. Is that okay?	
10	A. Yes.	12:00
11	Q. Because this is a virtual	
12	deposition, I'm going to when I introduce	
13	exhibits, these will be the same exhibit	
14	numbers as in the IPR proceedings, and so,	
15	they're documents you're probably familiar	12:00
16	with, but my plan is to upload those exhibits	
17	into the chat window.	
18	A. Okay.	
19	Q. And you would be able to download	
20	them and access them in order to refer to	12:00
21	them. Does that sound okay?	
22	A. That sounds okay. And also, just	
23	for the record, I have clean unmarked copies	
24	of my two declarations, and a clean unmarked	
25	copy of the Bianco reference, the '705	12:00





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