

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

DISCLAIMER

THIS IS A ROUGH DRAFT TRANSCRIPT. IT HAS BEEN TRANSLATED FROM STENO TO ENGLISH BY COMPUTER. THIS TRANSCRIPT HAS BEEN NEITHER EDITED NOR PROOFREAD BY THE COURT REPORTER.

ATKINSON BAKER, INC.

Deponent ,

having been first duly sworn, was examined and testified as follows:

Q. BY MR. ALEMANNI: Good morning. I apologize if I get the pronunciation right. Is it Ramde?

A. Yes, that's right.

Q. And is it Mr. or Doctor?

A. It's just Mr.

Q. I want to make sure I get that right. My name is John Alemanni. I'm an attorney with Kilpatrick Townsend in Raleigh, North Carolina here on behalf of Lenovo and are you -- do you know why you're here this morning?

A. Yes.

Q. And why is that?

A. It's part of the deposition -- the

25 deposition is part of the IPR that was filed and it's

1

1 part of that process I think.

2 Q. So there are two proceedings. The first
3 proceeding is IPR2019-01278 and that concerns patent
4 number 802-0083. And then there's a second IPR and
5 that is IPR2019-01279 and the patent number at issue in
6 that case is A510407. Both of these proceedings are
7 between Lenovo and DoDots. Does that sound right to
8 you?

9 A. Yes.

10 Q. And so you submitted declarations in both
11 those proceedings; correct?

12 A. Correct.

13 Q. And do you have a copy of that declaration
14 in front of you?

15 A. I do.

16 Q. Okay. And in both of the two different
17 proceedings it's labeled Exhibit 2003. Do you see
18 that?

19 A. Yes.

20 Q. So I'll refer to -- I'll probably just refer

Petitioners Lenovo Holding Company Inc., et al.

21 to one of them but I'll refer to it as Exhibit 2003 or
22 your declaration and those will mean the same thing.
23 Is that okay?
24 A. Okay.
25 Q. And are you familiar with referring to

2

1 patents by the last three digits?
2 A. I am.
3 Q. So if I say the 083 patent you'll understand
4 what I mean?
5 A. Yes.
6 Q. Okay. Great. Have you been deposed before?
7 A. I have.
8 Q. About how many times?
9 A. I think twice.
10 Q. Twice. Okay. So you know generally how
11 they run.
12 A. Yes.
13 Q. So you're under oath. You've already
14 provided your direct testimony so this is
15 cross-examination but you're under oath and you'll be
16 answering my questions unless your counsel instructs
17 you not to answer. He may object but if he objects but

Petitioners Lenovo Holding Company Inc., et al.

18 doesn't instruct you not to answer I'll expect you to
19 answer the questions. Is there any reason why you
20 can't give your best testimony today?

21 A. No.

22 Q. One thing I will ask especially with the
23 phone and video I'll try hard not to talk over you.
24 I'd appreciate if you do the same. I apologize if I
25 interrupt you. If you have any trouble understanding a

3

1 question please let me know and I'll either state it
2 again or if I need to I can rephrase it. But if you
3 don't understand me please ask me, please let me know
4 you don't understand it and if you don't ask me to
5 restate it or you don't tell me that you don't
6 understand, then I'm going to assume you do understand
7 it. Okay?

8 A. Okay.

9 Q. Okay. And so there are two declarations
10 because there's two different proceedings. They are
11 almost exactly the same. Is that your recollection as
12 well?

13 A. The proceedings meaning the IPR proceedings

Petitioners Lenovo Holding Company Inc., et al.

14 are the same?

15 Q. The two different IPR. You submitted two
16 declarations but they're almost the same. Is that your
17 recollection?

18 A. Yeah. My declarations -- my declarations
19 are the same or the IPRs are the same?

20 Q. The declaration that you submitted in each
21 of the two IPRs is essentially the same?

22 A. Yeah, they kind of cover the same material
23 and information, yes.

24 Q. And did you review anything in preparation
25 for your deposition?

4

1 A. I reviewed my declaration what I submitted.

2 Q. And your declaration includes exhibits;
3 correct?

4 A. Yes.

5 Q. And did you review those as well?

6 A. Not -- just briefly. Just to make sure that
7 I had them when I printed out the declaration, but
8 yeah.

9 Q. And is it your understanding that the
10 exhibits are the same for both declarations that are

Petitioners Lenovo Holding Company Inc., et al.

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.