

EXHIBIT 15

DR. NEIL G. SIEGEL - 11/14/2018

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

AGIS SOFTWARE DEVELOPMENT LLC,)
)
Plaintiff,)
) Case No.
vs.) 2:17-cv-514-JRG
) Pages 1 to 15
HTC CORPORATION,)
)
Defendant.)

DEPOSITION OF DR. NEIL SIEGEL
TAKEN ON
WEDNESDAY, NOVEMBER 14, 2018

Reported by: PHILIP D. NORRIS
CSR NO. 4980

<p style="text-align: right;">Page 2</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF TEXAS</p> <p>3 MARSHALL DIVISION</p> <p>4</p> <p>5 AGIS SOFTWARE DEVELOPMENT LLC,)</p> <p>6)</p> <p>7 Plaintiff,)</p> <p>8) Case No.</p> <p>9 vs.) 2:17-cv-515-JRG</p> <p>10)</p> <p>11 LG ELECTRONICS, INC.,)</p> <p>12)</p> <p>13 Defendant.)</p> <p>14)</p> <p>15 DEPOSITION OF DR. NEIL SIEGEL</p> <p>16 TAKEN ON</p> <p>17 WEDNESDAY, NOVEMBER 14, 2018</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24 Reported by: PHILIP D. NORRIS</p> <p>25 CSR NO. 4980</p>	<p style="text-align: right;">Page 3</p> <p>1 Deposition of Dr. Neil Siegel, taken on</p> <p>2 behalf of Defendants, at 3635 Fashion Way, Torrance,</p> <p>3 California, on Wednesday, November 14, 2018, at 4:51</p> <p>4 p.m., before Philip D. Norris, CSR No. 4980,</p> <p>5 pursuant to Notice.</p> <p>6</p> <p>7 APPEARANCES:</p> <p>8 FOR THE PLAINTIFF:</p> <p>9 BROWN RUDNICK</p> <p>10 BY: VINCENT RUBINO, ESQ.</p> <p>11 ENRIQUE W. ITURRALDE, ESQ.</p> <p>12 7 Times Square</p> <p>13 New York, New York 10036</p> <p>14 (212) 209-4800</p> <p>15 Email: Vrubino@brownrudnick.com</p> <p>16 Eiturralde@brownrudnick.com</p> <p>17 FOR THE DEFENDANT APPLE, INC.:</p> <p>18 DESMARAIS, LLP</p> <p>19 BY: KATHRYN BI, ESQ.</p> <p>20 AMEET A. MODI, ESQ.</p> <p>21 230 Park Avenue</p> <p>22 New York, New York 10169</p> <p>23 (212) 351-3406</p> <p>24 Email: Amodi@desmaraisllp.com</p> <p>25</p>						
<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 FOR THE DEFENDANT HTC CORPORATION:</p> <p>4 PERKINS COIE</p> <p>5 BY: MIGUEL J. BOMBACH, ESQ.</p> <p>6 11988 El Camino Real, Suite 350</p> <p>7 San Diego, California 92130</p> <p>8 Email: Mbombach@perkinscoie.com</p> <p>9</p> <p>10 FOR THE DEFENDANT LG ELECTRONICS:</p> <p>11 ARNOLD & PORTER</p> <p>12 BY: JUSTIN J. CHI, ESQ.</p> <p>13 777 South Figueroa Street, 44th Floor</p> <p>14 Los Angeles, California 90017</p> <p>15 (213) 243-4030</p> <p>16 Email: Justin.chi@arnoldporter.com</p> <p>17</p> <p>18 ALSO PRESENT:</p> <p>19 THE VIDEOGRAPHER: RENEE MAYFIELD</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p style="text-align: center;">I N D E X</p> <p>1</p> <p>2</p> <table border="0"> <tr> <td style="width: 30%;">3 WITNESS</td> <td style="width: 40%;">EXAMINATION</td> <td style="width: 30%;">PAGE</td> </tr> <tr> <td>4 Dr. Neil Siegel</td> <td>(By Mr. Bombach)</td> <td style="text-align: right;">7</td> </tr> </table> <p>5</p> <p>6 NO EXHIBITS OFFERED</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	3 WITNESS	EXAMINATION	PAGE	4 Dr. Neil Siegel	(By Mr. Bombach)	7
3 WITNESS	EXAMINATION	PAGE					
4 Dr. Neil Siegel	(By Mr. Bombach)	7					

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1 TORRANCE, CALIFORNIA; WEDNESDAY, NOVEMBER 14, 2018
 2 4:51 P.M.
 3
 4
 5 THE VIDEOGRAPHER: Here begins Videotape
 6 No. 1 in the deposition of Dr. Neil Siegel, in the
 7 matter of AGIS Software Development LLC versus HTC
 8 Corporation, in the United States District Court,
 9 for the Eastern District of Texas. Case No.
 10 2:17-cv-00514 JRG, consolidated with 2:17-cv-0515
 11 JRG. Today's date is November 14th, 2018. The time
 12 on the video monitor is 4:51 p.m. The video
 13 operator today is Renee Mayfield. This video
 14 deposition is taking place at 3635 Fashion Way,
 15 Torrance, California 90503.
 16 Counsel, please voice identify yourselves
 17 and state whom you represent.
 18 MR. BOMBACH: Miguel Bombach on behalf of
 19 HTC Corporation from Perkins Coie.
 20 MR. CHI: Justin Chi from Arnold & Porter
 21 representing LG Electronics, Inc.
 22 MS. BI: Kathryn Bi, Desmarais LLP, on
 23 behalf of the witness. With me is Ameet Modi,
 24 Desmarais LLP, also on behalf of the witness.
 25 MR. RUBINO: Vincent Rubino from the law

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1 BY MR. BOMBACH:
 2 Q. Now, you provided an expert report for
 3 Apple in the AGIS v Apple case; correct?
 4 A. That is correct.
 5 Q. That was previously marked as Exhibit 1 in
 6 the AGIS v Apple case.
 7 Do you guys object to me pulling the
 8 Exhibit 1? Can I have Exhibit 1 from the AGIS v
 9 Apple case to --
 10 MR. RUBINO: We have no objection.
 11 MR. BOMBACH: -- to provide to Dr. Siegel?
 12 Or do you still have?
 13 THE WITNESS: This is my copy, I think.
 14 Yes, sir, I now have the item marked as
 15 Exhibit 1 if front of me.
 16 BY MR. BOMBACH:
 17 Q. And in Exhibit 1 you cited numerous items
 18 bearing Bates label stamps SIEGEL and APL-AGIS;
 19 correct?
 20 A. Yes, sir.
 21 Q. Did you review the items identified in
 22 Exhibit 1 that are Bates labeled SIEGEL and APL-
 23 AGIS?
 24 MR. RUBINO: Objection, form.
 25 THE WITNESS: Yes.

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1 firm of Brown Rudnick. Also with me from the law
 2 firm of Brown Rudnick is Enrique Iturralde.
 3 THE VIDEOGRAPHER: The court reporter today
 4 is Philip Norris of Epiq Court Reporters.
 5 Would the reporter please swear in the
 6 witness.
 7
 8 DR. NEIL SIEGEL,
 9 having been first duly sworn, was
 10 examined and testified as follows:
 11
 12 EXAMINATION
 13
 14 BY MR. BOMBACH:
 15 Q. Thank you for your time, Dr. Siegel. I
 16 know you just spoke, you were asked a few questions
 17 in another matter a few hours ago. It was AGIS
 18 versus Apple. I have a few questions for a separate
 19 matter where AGIS has sued HTC Corporation and LG
 20 Electronics.
 21 In the AGIS versus Apple case you provided
 22 testimony. Rather than rehash everything, you
 23 testified truthfully; correct?
 24 A. Yes, sir.
 25 MR. RUBINO: Object to form.

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1 BY MR. BOMBACH:
 2 Q. Did you review the pages of the items
 3 labeled SIEGEL and APL-AGIS that you had cited to in
 4 the body of your report?
 5 A. Yes.
 6 MR. RUBINO: Objection to the form,
 7 leading.
 8 BY MR. BOMBACH:
 9 Q. Do you have any reason to believe that the
 10 items you cited to in Exhibit 1 are fakes?
 11 MR. RUBINO: Objection to form, leading.
 12 THE WITNESS: No, sir.
 13 BY MR. BOMBACH:
 14 Q. Do you have any reason to believe that
 15 anything you reviewed and cited to in Exhibit 1 was
 16 not authentic or was in any way doctored?
 17 MR. RUBINO: Objection to form, leading.
 18 THE WITNESS: No, sir.
 19 BY MR. BOMBACH:
 20 Q. Is your basis for stating this based on
 21 your personal knowledge and experience with the
 22 FBCB2 system described in Exhibit 1?
 23 MR. RUBINO: Objection to form, leading.
 24 THE WITNESS: I'm sorry, could you repeat
 25 that?

<p style="text-align: right;">Page 10</p> <p>1 BY MR. BOMBACH:</p> <p>2 Q. Oh, your basis for stating -- prior to my</p> <p>3 previous questions, you stated that you had no</p> <p>4 reason to believe that any of the documents you</p> <p>5 cited were fake or doctored; correct?</p> <p>6 MR. RUBINO: Objection, form leading.</p> <p>7 THE WITNESS: Yes.</p> <p>8 BY MR. BOMBACH:</p> <p>9 Q. Is your basis for stating this based on</p> <p>10 your personal knowledge with the FBCB2 system?</p> <p>11 MR. RUBINO: Objection, form, leading.</p> <p>12 THE WITNESS: Yes, sir.</p> <p>13 BY MR. BOMBACH:</p> <p>14 Q. If you could please turn to paragraph 56 of</p> <p>15 Exhibit 1.</p> <p>16 A. Yes, sir.</p> <p>17 Q. Can you please briefly read that to</p> <p>18 yourself? And let me know when you're okay.</p> <p>19 A. I've completed reading paragraph 56.</p> <p>20 Q. Does your expert report marked as Exhibit 1</p> <p>21 accurately describe the FBCB2 system as it existed</p> <p>22 in use by others prior to September 20th, 2004?</p> <p>23 MR. RUBINO: Objection to form, leading.</p> <p>24 THE WITNESS: Yes.</p> <p>25 ///</p>	<p style="text-align: right;">Page 11</p> <p>1 BY MR. BOMBACH:</p> <p>2 Q. Does your expert report marked as Exhibit 1</p> <p>3 accurately represent certain facts surrounding the</p> <p>4 FBCB2 system as it existed prior to September 20th,</p> <p>5 2004?</p> <p>6 MR. RUBINO: Objection to form, leading.</p> <p>7 THE WITNESS: Yes, it did.</p> <p>8 BY MR. BOMBACH:</p> <p>9 Q. Does your expert report marked as Exhibit 1</p> <p>10 represent your independent opinion?</p> <p>11 MR. RUBINO: Objection to form, leading.</p> <p>12 THE WITNESS: Yes.</p> <p>13 BY MR. BOMBACH:</p> <p>14 Q. And in Exhibit 1 you analyzed particular</p> <p>15 claims; correct?</p> <p>16 MR. RUBINO: Objection to form.</p> <p>17 THE WITNESS: Yes.</p> <p>18 BY MR. BOMBACH:</p> <p>19 Q. And was this -- and you're -- on the cover</p> <p>20 of Exhibit 1, this was in conjunction with the AGIS</p> <p>21 v Apple case; correct?</p> <p>22 MR. RUBINO: Objection to form.</p> <p>23 THE WITNESS: Yes.</p> <p>24 BY MR. BOMBACH:</p> <p>25 Q. And I represent HTC Corporation in a</p>
<p style="text-align: right;">Page 12</p> <p>1 separate matter; you understand that?</p> <p>2 A. I understand that, sir.</p> <p>3 Q. You did not analyze every single claim of</p> <p>4 U.S. Patent No. 8 -- and I apologize, I'm going to</p> <p>5 list them out: 8,213,970, U.S. Patent No. 9,408,055,</p> <p>6 U.S. patent No. 9,445,251 or U.S. Patent No.</p> <p>7 9,467,838? You did not analyze all claims of those</p> <p>8 patents in your report; correct?</p> <p>9 MR. RUBINO: Objection to form.</p> <p>10 THE WITNESS: Let me state it very clearly.</p> <p>11 There were four patents --</p> <p>12 MR. BOMBACH: Yes.</p> <p>13 THE WITNESS: -- that I analyzed, last</p> <p>14 three digits were '838, '829, '055 and '251, and I</p> <p>15 analyzed a subset of the claims that I was asked to</p> <p>16 analyze.</p> <p>17 BY MR. BOMBACH:</p> <p>18 Q. Was the scope of your work limited to the</p> <p>19 certain claims you analyzed -- the certain subset of</p> <p>20 claims you analyzed and discussed in your report?</p> <p>21 A. Right. That is what -- that is the scope</p> <p>22 and the extent of my analysis that is described in</p> <p>23 this report.</p> <p>24 MR. BOMBACH: I have no further questions.</p> <p>25 Thank you.</p>	<p style="text-align: right;">Page 13</p> <p>1 MR. CHI: No questions from IG.</p> <p>2 MR. RUBINO: No questions from AGIS.</p> <p>3 MS. BI: No questions from Apple.</p> <p>4 THE VIDEOGRAPHER: This marks the end of</p> <p>5 Volume I, Videotape No. 1 Kin the deposition of</p> <p>6 Dr. Neil Siegel.</p> <p>7 Going off the record. The time is 4:59</p> <p>8 p.m.</p> <p>9 ///</p> <p>10 ///</p> <p>11 ///</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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