

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MASTERCARD INTERNATIONAL INCORPORATED
Petitioner

v.

LEON STAMBLER
Patent Owner

Case CBM2015-00044
Patent No. 5,793,302

**NOTICE OF DEPOSITION OF PROFESSOR WHITFIELD DIFFIE
UNDER 37 C.F.R. 42.53**

Please take notice that, after agreement by all parties as to scheduling, beginning at 9:30 a.m. on October 2, 2015 at the offices of Baker Botts LLP, Building One, 1001 Page Mill Rd #200, Palo Alto, CA 94304, or such other date and location to be agreed upon by the parties, Patent Owner Leon Stambler will take the deposition of Professor Whitefield Diffie before a duly qualified notary public or other officer authorized to administer oaths. The deposition shall be recorded at least stenographically by an officer authorized to take testimony under 35 U.S.C. 23.

Dated: August 17, 2015

/s/ Robert P. Greenspoon

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APPENDIX A

LIST OF EXHIBITS THAT MAY BE RELIED UPON DURING DEPOSITION

Identifier	Description
Paper 1	Petition for Covered Business Method Review
Paper 7	(Corrected) Petition for Covered Business Method Review
Paper 9	Patent Owner Leon Stambler's Preliminary Response to Mastercard International Inc.'s Petition for Covered Business Method Patent Review
Paper 10	Decision Institution of Covered Business Method Patent Review
Paper 12	Patent Owner Leon Stambler's Request for Rehearing on Board's Decision to Institute Covered Business Method Patent Review
Exhibit 1001	USP 5,793,302
Exhibit 1002	Complaint
Exhibit 1003	Infringement Contentions
Exhibit 1004	Davies, Volumes 1, 2, and 3
Exhibit 1005	Nechvatal
Exhibit 1006	USP 4,868,877
Exhibit 1007	USP 4,200,770
Exhibit 1008	USP 4,993,068
Exhibit 1009	FH 07.977385
Exhibit 1010	FH 08.122071
Exhibit 1011	FH 08.747174
Exhibit 1012	Memo Order, Stambler v. RSA
Exhibit 1013	Memo Opinion, Stambler v. JPMorgan
Exhibit 1014	Memo Opinion, Stambler v. Merrill Lynch
Exhibit 1015	CC Order, Stambler v. Amazon
Exhibit 1016	Memo Opinion, Stambler v. ING
Exhibit 1017	Provisional Order, Stambler v. Atmos
Exhibit 1018	Claim Terms
Exhibit 1019	IV v. Capital One
Exhibit 1020	Diffie Declaration
Exhibit 1021	CC Brief
Exhibit 1022	Meyer

Exhibit 2001	Visa Inc. v. Leon Stambler, IPR2014-00694, Paper 10, Decision, PTAB (Oct. 31, 2013)
Exhibit 2002	Defendants Mastercard Incorporated and Mastercard International Incorporated's Invalidity Contentions
Exhibit 2003	Meyer Claim Chart

APPENDIX B

GENERAL DESCRIPTION OF SCOPE AND NATURE OF THE TESTIMONY TO BE ELICITED

The deposition will include questions eliciting testimony regarding the following, to the extent that trial has been instituted:

1. The documents and information reviewed or considered in preparing Exhibit 1020, the witness's Declaration dated December 11, 2014 and exhibits/references (directly and indirectly cited) thereto.
2. The exhibits/references (directly and indirectly cited) to the witness's Declaration dated December 11, 2014, including but not limited to their creation and content.
3. The facts, statements, and opinions, and the basis for each of them, in the witness's Declaration dated December 11, 2014 and exhibits/references (directly and indirectly cited) thereto, filed in the above-captioned matter.

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of August, 2015, true and correct copy of the foregoing Patent Owner Leon Stambler's Notice of Deposition of Professor Whitfield Diffie Under 37 C.F.R. 42.53, was served, in accordance with the parties' electronic service agreement, by electronic mail upon the following lead and backup counsels of record for Petitioner MasterCard International, Inc.:

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