1	UNITED STATES PATENT AND TRADEMARK OFFICE
2	
3	BEFORE THE PATENT TRIAL AND APPEAL BOARD
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5	SZ DJI TECHNOLOGY CO., LTD.,
6	Petitioner,
7	v.
8	AUTEL ROBOTICS USA LLC,
9	Patent Owner.
10	Alfred Docharma Suly 13, 2020
11	Case IPR2019-00846
12	Patent 9,260,184
13	The discovery teleconference
14	deposition of ALFRED DUCHARME, called by the
15	Patent Owner, for examination, pursuant to
16	notice, taken remotely before LAURA MUKAHIRN,
17	CSR, RPR, CRR, within and for the County of Cook
18	and State of Illinois, on July 13, 2020,
19	scheduled to commence at 8:00 o'clock a.m. CST.
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24	

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## 2 to 5

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		Page 2		Page 4
1	APPEARANCES:	5	1	THE COURT REPORTER: The attorneys
2	KING & SPALDING, LLP		2	participating in this deposition acknowledge
3	BY: MR. STEVEN PETERS speters@kslaw.com		3	that I am not physically present in the
	1700 Pennsylvania Avenue NW		4	deposition room and that I will be reporting
4	2nd Floor		_	
	Washington, D.C. 20006		5	this deposition remotely. They further
5	(202)737-0500		6	acknowledge that, in lieu of an oath
	Appeared on behalf of the Petitioner;		7	administered in person, the witness will
6 7	STEPTOE & JOHNSON LLP		8	verbally declare his testimony in this matter is
	BY: MR. JOHN L. ABRAMIC		9	under penalty of perjury. The parties and their
8	jabramic@steptoe.com		10	counsel consent to this arrangement and waive
	227 West Monroe Street		11	any objections to this manner of reporting.
9	Suite 4700			
	Chicago, Illinois 60606		12	Please indicate your agreement by stating your
10	(312)577-1300		13	name and your agreement on the record.
11	Appeared on behalf of the Patent Owne:	r.	14	MR. ABRAMIC: This is John Abramic on behalf
12			15	of patent owner. I agree.
13			16	MR. PETERS: Steven Peters on behalf of
14			17	petitioner, I agree.
15				
16			18	(Witness sworn.)
17		Alfred Ducharme July 13, 2020	19	DR. ALFRED DUCHARME,
18 19			20	called as a witness herein, having been first
20			21	duly sworn, was examined and testified as
21			22	follows:
22			23	Examination
23			24	By Mr. Abramic
24			21	By Mr. Abranice
		Dago 2		Dago 5
1	I N D E X	Page 3	1	Page 5 Q. Good morning, Dr. Ducharme.
1 2		Page 3	_	Q. Good morning, Dr. Ducharme.
2		-	2	Q. Good morning, Dr. Ducharme. A. Good morning.
2	Examinations Pr	age	2	<ul><li>Q. Good morning, Dr. Ducharme.</li><li>A. Good morning.</li><li>Q. Could you please state and spell your</li></ul>
2	Examinations P. Examination	age	2 3 4	<ul><li>Q. Good morning, Dr. Ducharme.</li><li>A. Good morning.</li><li>Q. Could you please state and spell your name for the record?</li></ul>
2 3	Examinations P. Examination	age 4 56	2	<ul><li>Q. Good morning, Dr. Ducharme.</li><li>A. Good morning.</li><li>Q. Could you please state and spell your</li></ul>
2 3 4	Examinations P. Examination By Mr. Abramic	age 4 56	2 3 4	<ul><li>Q. Good morning, Dr. Ducharme.</li><li>A. Good morning.</li><li>Q. Could you please state and spell your name for the record?</li></ul>
2 3 4 5	Examinations P. Examination By Mr. Abramic Examination	age 4 56	2 3 4 5	<ul> <li>Q. Good morning, Dr. Ducharme.</li> <li>A. Good morning.</li> <li>Q. Could you please state and spell your name for the record?</li> <li>A. Sure. It's First and last?</li> </ul>
2 3 4 5	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters	age 4 56 vv.uisejiesport.cm	2 3 4 5 6	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please.
2 3 4 5	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters Re-Examination	age 4 56 vv.uisejiesport.cm	2 3 4 5 6 7 8	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please. A. Alfred, A-L-F-R E-D; Ducharme, D-U-C-H-A-R-M-E.
2 3 4 5 6	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters Re-Examination	age 4 56 vv.uisejiesport.cm	2 3 4 5 6 7 8 9	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please. A. Alfred, A-L-F-R E-D; Ducharme, D-U-C-H-A-R-M-E. Q. Thank you. And have you been deposed
2 3 4 5 6	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters Re-Examination By Mr. Abramic E X H I B I T S	age 4 56 vv.uisejiesport.cm	2 3 4 5 6 7 8 9 10	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please. A. Alfred, A-L-F-R E-D; Ducharme, D-U-C-H-A-R-M-E. Q. Thank you. And have you been deposed before, Dr. Ducharme?
2 3 4 5 6 7	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters Re-Examination By Mr. Abramic E X H I B I T S	age 4 56 v.s. Land, support www.unispilepopt.com	2 3 4 5 6 7 8 9	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please. A. Alfred, A-L-F-R E-D; Ducharme, D-U-C-H-A-R-M-E. Q. Thank you. And have you been deposed
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2 3 4 5 6 7 8 9	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters Re-Examination By Mr. Abramic E X H I B I T S No. P. Exhibit No. 1003	age 4 56 v.t. Lank surroor www.urlealingport.com 59 age	2 3 4 5 6 7 8 9 10 11	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please. A. Alfred, A-L-F-R E-D; Ducharme, D-U-C-H-A-R-M-E. Q. Thank you. And have you been deposed before, Dr. Ducharme? A. I have.
2 3 4 5 6 7 8 9 10	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters Re-Examination By Mr. Abramic E X H I B I T S No. P. Exhibit No. 1003 Exhibit No. 0128	age 4 56 v.s. Links surrow www.usealequert.com 59 age 7 8	2 3 4 5 6 7 8 9 10 11 12	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please. A. Alfred, A-L-F-R E-D; Ducharme, D-U-C-H-A-R-M-E. Q. Thank you. And have you been deposed before, Dr. Ducharme? A. I have. Q. Okay. So I'll spare you the ground
2 3 4 5 6 7 8 9 10 11	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters Re-Examination By Mr. Abramic E X H I B I T S No. P. Exhibit No. 1003 Exhibit No. 0128 Exhibit No. 1030	age 4 56 v.s. Leat surrow www.selegilegeet.com 59 39 age 7 8 9	2 3 4 5 6 7 8 9 10 11 12 13 14	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please. A. Alfred, A-L-F-R E-D; Ducharme, D-U-C-H-A-R-M-E. Q. Thank you. And have you been deposed before, Dr. Ducharme? A. I have. Q. Okay. So I'll spare you the ground rules. The only thing I'll ask is if you don't understand a question, just let me know, and I
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters Re-Examination By Mr. Abramic EXHIBITS No. EXHIBITS No. Exhibit No. 1003 Exhibit No. 1030 Exhibit No. 1030 Exhibit No. 1006	age 4 56 vv.s.Land.support.com 59 age 7 8 9 11	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please. A. Alfred, A-L-F-R E-D; Ducharme, D-U-C-H-A-R-M-E. Q. Thank you. And have you been deposed before, Dr. Ducharme? A. I have. Q. Okay. So I'll spare you the ground rules. The only thing I'll ask is if you don't understand a question, just let me know, and I will try my best to rephrase so we have a mutual understanding. Is that all right? A. Okay. Q. If you need a break, just let me know. This is not going to be an endurance contest. A. Okay.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters Re-Examination By Mr. Abramic EXHIBITS No. EXHIBITS No. Exhibit No. 1003 Exhibit No. 1030 Exhibit No. 1030 Exhibit No. 1006	age 4 56 vv.s.Land.support.com 59 age 7 8 9 11	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please. A. Alfred, A-L-F-R E-D; Ducharme, D-U-C-H-A-R-M-E. Q. Thank you. And have you been deposed before, Dr. Ducharme? A. I have. Q. Okay. So I'll spare you the ground rules. The only thing I'll ask is if you don't understand a question, just let me know, and I will try my best to rephrase so we have a mutual understanding. Is that all right? A. Okay. Q. If you need a break, just let me know. This is not going to be an endurance contest. A. Okay. Q. And it's my understanding that you have
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters Re-Examination By Mr. Abramic EXHIBITS No. EXHIBITS No. Exhibit No. 1003 Exhibit No. 1030 Exhibit No. 1030 Exhibit No. 1006	age 4 56 vv.s.Land.support.com 59 age 7 8 9 11	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please. A. Alfred, A-L-F-R E-D; Ducharme, D-U-C-H-A-R-M-E. Q. Thank you. And have you been deposed before, Dr. Ducharme? A. I have. Q. Okay. So I'll spare you the ground rules. The only thing I'll ask is if you don't understand a question, just let me know, and I will try my best to rephrase so we have a mutual understanding. Is that all right? A. Okay. Q. If you need a break, just let me know. This is not going to be an endurance contest. A. Okay. Q. And it's my understanding that you have submitted three declarations in this proceeding. Does that sound correct to you?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Examinations P. Examination By Mr. Abramic Examination By Mr. Peters Re-Examination By Mr. Abramic EXHIBITS No. EXHIBITS No. Exhibit No. 1003 Exhibit No. 1030 Exhibit No. 1030 Exhibit No. 1006	age 4 56 vv.s.Land.support.com 59 age 7 8 9 11	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Good morning, Dr. Ducharme. A. Good morning. Q. Could you please state and spell your name for the record? A. Sure. It's First and last? Q. Yes, please. A. Alfred, A-L-F-R E-D; Ducharme, D-U-C-H-A-R-M-E. Q. Thank you. And have you been deposed before, Dr. Ducharme? A. I have. Q. Okay. So I'll spare you the ground rules. The only thing I'll ask is if you don't understand a question, just let me know, and I will try my best to rephrase so we have a mutual understanding. Is that all right? A. Okay. Q. If you need a break, just let me know. This is not going to be an endurance contest. A. Okay. Q. And it's my understanding that you have submitted three declarations in this proceeding.

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# DJI v. Autel IPR2019-00846

Page 6         Output         Page 6           1         0. Fam going to try to give you access to         2         your first declaration. And you can look at as           3         A. Okay.         3         A. Okay.         3         and Steven did this successfully last           4         O. And Steven did this successfully last         and the version that this does to the final page           5         Jour first declaration should have         5         convenience, Till pull is does to the final page           6         on the screen hare doesn't appear to be         5         convenience, Till pull is does to the final page           10         Q. Sure. No probles.         7         For same reason it looks like there we           11         A. Okay.         A. Okay.         The schede Schibt 1000.           11         A. Okay.         A. Okay.         The schede Schibt 1000.           11         A. Okay.         Mall Scheder Schibt 1000.         A. Togend E Schibt 1000.           11         A. Okay.         The scheder Schibt 1000.         D. Okay. Thak you. And then let's do the same           13         encorran Just E to reason I'm just having         D. Okay. And then let's do the same           14         the third is Schibt 1000.         D. Okay. And then let's do the same           15         elector			5,	
2         those three declarations right now.         2         your first declaration. And you can look at as           3         A. Okay.         and Steven did this successfully last         and Steven did this successfully last           5         time, so the pressure is on me.         and Steven did this successfully last           6         So your first declaration should have         or on the screen here.           7         popped up Exhibit 1003. Did you receive that?         and the screen here.           8         A. Yes. I'm just going to take a moment         or onke a folder.           9         own king all that well. Would you mind opening         behibit 1003. Did you receive that?           1         A. Okay.         and toos hould have been           1         A. Okay.         through it now. It does appear to be my first           10         Deposition Exhibit Nos. 1003,         11           11         A. To pened Exhibit 1023. I'm looking         12           11         Introduced and provided         12         exercise with he next two declarations. First           12         electronically to the were recorely         12         0. Okay. And then let's do the same           12         second monitor. I can do that i a little         13         13           12         Q. Well, I can share the score here to				
<ul> <li>A. Okay.</li> <li>Q. And Steven did this successfully last titme, so the pressure is on me.</li> <li>So your first declaration should have popped up Eshibit 1003. Did you reasive that?</li> <li>A. Yes. I'm just going to take a moment to make a folder.</li> <li>Q. Sure. No problem.</li> <li>A. Okay.</li> <li>Q. And your mest two also should have sent over. The second me is Eshibit 1028 and the third is Eshibit 1030.</li> <li>M. Yes. The second me is Eshibit 1028 and the third is Eshibit 1030.</li> <li>M. Yes. The second me is Eshibit 1028 and the third is Eshibit 1030.</li> <li>M. Yes. The second and provided electronically to the urgent preporter.)</li> <li>M. Yes. I have remotely through the area two heads have been through the area two heads have the urgent preporter.)</li> <li>M. Yes. I have remotely through the area two heads have the urgent through very briefly, just going through it to and Steve have access them and down have it pop up on the screen. Just her mean when you've received these. The main reason I'm doing this is to make sure the court reporter.)</li> <li>M. Yes. I have received them and down heaves. Just the kerner, I through very briefly, just going through it to and Steve have access them.</li> <li>M. Yes. I have received them and down have, and rest when the screen.</li> <li>M. Yes. I have received them and down have, and rest the screen for that form declaration, which is takinit 1003, and i first declaration, which is takinit 1003, and i the first page of Eshib</li></ul>		Q. I am going to try to give you access to	1	point is confirm that this document, indeed, is
4       Q. And Steven did this successfully last       4       the version that I sent you. But for your         5       time, so the pressure is on me.       5         6       Boyour first declaration should have       5         7       Page 5       For some reason it looks like there we         8       A. Yee. I'm just going to take a moment       9         9       Sure. No problem.       7         10       Q. Sure. No problem.       1         11       A. Gay.       1         12       Q. And your next two also should have been       10         13       sent over. The second one is Edulbit 1028 and       1         14       the third is Ebulbit 1030 user remotely       11         16       Deposition Ebulbit Nos. 1033,       14         17       1028, and 1030 were remotely       15         18       introduced and provided       16       2         19       electronically to the working at       16       18         20       resport.)       1       1       11         21       THE WITNESS: I news I should have grabbed at       1       1         22       econd maint is to make sure the ocurt reoprice       2       0. Sure. Take your time. <t< td=""><td>2</td><td>those three declarations right now.</td><td>2</td><td>your first declaration. And you can look at as</td></t<>	2	those three declarations right now.	2	your first declaration. And you can look at as
<ul> <li>time, so the pressure is on me.</li> <li>time, so the pressure is on me.</li> <li>so your first declaration should have</li> <li>popped up bdbibt 1003, bid you receive that?</li> <li>A. Yes, I'm just going to take a moment</li> <li>to make a folder.</li> <li>O. Sure. No problem.</li> <li>A. Okay.</li> <li>Q. And your next two also should have been</li> <li>the third is Exhibit 1030.</li> <li>C. Beyopoint on sis bkhibit 1028 and</li> <li>the third is Exhibit 1030.</li> <li>C. Beyopoint on sin bkhibit 1028 and</li> <li>the third is Exhibit 1030.</li> <li>C. Beyopoint on sin bkhibit 1028 and</li> <li>the third is Exhibit 1030.</li> <li>C. Beyopoint on sin bkhibit 1028 and</li> <li>the third is Exhibit 1030.</li> <li>C. Beyopoint on sin bkhibit 1028 and</li> <li>the third is Exhibit 1030.</li> <li>C. Beyopoint on sin bkhibit 1028 and</li> <li>the third is Exhibit 1030.</li> <li>C. Beyopoint on sin bkhibit 1028 and</li> <li>the third is Exhibit 1030.</li> <li>THE WITHESSI I have i should have grabbed a bave it pop up on the screen. Just let me know</li> <li>downloaded them, and I'm ready to open the sin</li> <li>downloaded them, and I'm ready to open the sin</li> <li>downloaded them, and I'm ready to open the sin</li> <li>meta be.</li> <li>Q. Okay. I'm going to start with your</li> <li>the first declaration, thich is Schibit 1003, and</li> <li>the first declaration, thich is Schibit 1003, and</li> <li>Tim going to pull it up here on the screen, I'm</li> <li>the first declaration this you sole 'ready to open them if</li> <li>med be.</li> <li>Q. Okay. I'm going to start with your</li> <li>A. T do.</li> <li>Q. Okay. Thank you. So we're looking at</li> <li>the first declaration that you</li> <li>A. I do.</li> <li>Q. Add does that appear to be the first</li> <li>Q. Add does that appear to be the first</li> <li>Q. Add does that appear to be the first</li> <li>Q. Chay. Thank you. So we're looking 't work and you. And I would like to</li> <li>A. T do.</li> <li>Q. Okay. Thank you. So we're looking 't you signature i</li></ul>	3	A. Okay.	3	much of it as you want. You may want to open
6         So your first declaration should have         6         on the screen hare.           7         Porgeed up Exhibit 1003. Did you receive that?         For some reason it looks like there we           9         to make a folder.         7         For some reason it looks like there we           9         to make a folder.         9         So vorting all that well. Would you mind opening           10         Q. Sure. No problem.         10         Babibit 1003 that I sent to you?           11         A. Okay.         10         A. How you next two also should have been           13         sent over. The second one is Exhibit 1003.         10         Chay. Thank you. And then on Page 80,           15         (Whereupon, Dr. Ducharme         10         Q. Okay. Thank you. And then on Page 80,           16         Deposition Exhibit Nos. 1003,         10         Q. Okay. And then let's do the same           18         exercise with the next two declarations.         First           19         will start with Babibit 0128.         0         A. Yeeh. Por some reason 1'm just having           13         second monitor. I can do that in a little         13         eccaration.         First           20         Well. I can share the screen here to         3         A. Yeeh. Por some reason 1'm just having <t< td=""><td>4</td><td>Q. And Steven did this successfully last</td><td>4</td><td>the version that I sent you. But for your</td></t<>	4	Q. And Steven did this successfully last	4	the version that I sent you. But for your
7       popped up bothibit 1003. Did you receive that?       7       For some reason it looks like there we         8       A. Yes. I'm just going to take a moment       9       90. The screen share doesn't appear to be         9       90. Sure. No problem.       1       A. Okay.       11         11       A. Okay.       11       A. I opened Exhibit 1003. I'm looking         12       0. And your next two also should have been       11       A. I opened Exhibit 1003. I'm looking         13       sent over. The second one is Exhibit 1028 and       14       the third is Exhibit 1030.         14       the third is Exhibit 1030.       1028, and 1030 were remotely       16       0. Okay. Thank you. And then on Page 80.         15       introduced and provided       19       electronically to the introduced and provided       12         19       electronically to the introduced and provided       21       a little trouble with the files. Hold on. I'm         21       while.       22       A. Yes. I have removed with the next two declaration.       17         24       reporter.)       20       a little trouble with the files. Hold on I'm         23       while.       2       a little trouble with the files. Hold on I'm         24       reporter.)       2       declaration.       2 </td <td>5</td> <td>time, so the pressure is on me.</td> <td>5</td> <td>convenience, I'll pull it down to the final page</td>	5	time, so the pressure is on me.	5	convenience, I'll pull it down to the final page
8       A. Yes. I'm just going to take a noment       9       go. The screen share doesn't appear to be         9       to make a folder.       9       working all that well. Would you mind opening         10       Q. Sure. No problem.       10       10       Whing all that well. Would you mind opening         11       A. Okay.       10       Exhibit 1003 that I sent to you?         12       D. And your next two also should have been       13       sent over. The second one is Exhibit 1008. 1003.         15       (Mareupon, Dr. Duchame       14       Q. Okay. And then on Page 80.         16       Deposition Exhibit Nos. 1003.       10       A. Yes.         17       10238, and 1030 were remotely       10       A. Yes.         18       introduced and provided       12       1. Veah. For some reason I'm just having         19       electronically to the grabbed a       2. A. Yes. I have received these and       2. A. Yes. I have received these and         21       THE WITNESS: I knew I should have grabbed a       3. A. Yes. I believe Exhibit 1028 that you         22       Q. Well, I can share the screen here to       3. A. Yes. I believe Exhibit 1028 that you         31       when you've received them and       3. Yes. I believe Exhibit 1028.       3. A. Yes. I believe Exhibit 1028.         32       O. Okay.	6	So your first declaration should have	6	on the screen here.
<ul> <li>9 to make a folder.</li> <li>9 to make a folder.</li> <li>0. Sure. No problem.</li> <li>1. A. Okay.</li> <li>1. A. Okay.</li> <li>1. A. Okay.</li> <li>1. A. Okay.</li> <li>1. A. I could you mind opening</li> <li>10 Exhibit 1003 that I sent to you?</li> <li>1. A. I could you mind opening</li> <li>10 Exhibit 1003 that I sent to you?</li> <li>1. A. I could you mind opening</li> <li>10 Exhibit 1003 that I sent to you?</li> <li>1. A. I could you mind opening</li> <li>10 Exhibit 1003.</li> <li>11 A. I could you mind opening</li> <li>12 through it now. It does appear to be the first</li> <li>13 declaration.</li> <li>14 0. Okay. Thank you. And then on Page 80,</li> <li>15 (Marceupon, Dr. Ducharme</li> <li>10 Exhibit 1030 were remotely</li> <li>16 A. Yes.</li> <li>17 1028, and 1030 were remotely</li> <li>18 introduced and provided</li> <li>19 electronically to the working</li> <li>19 electronically to the working</li> <li>20 a little trouble with the files. Hold on. I'm</li> <li>21 a little trouble with the files. Hold on. I'm</li> <li>22 opening 1028 now. I'm looking at it, looking</li> <li>23 through very breifly, just going through it to</li> <li>24 a little trouble with the files. Hold on. I'm</li> <li>23 declaration.</li> <li>24 a little trouble with the files. Hold on. I'm</li> <li>23 a little trouble with the files. Hold on. I'm</li> <li>24 opening 1028 now. I'm looking at it, looking</li> <li>24 a little trouble with the files. Hold on. I'm</li> <li>25 on ake sure the court reporter.</li> <li>26 and Steve have access to them.</li> <li>37 A. Yes. I have received them and</li> <li>38 downloaded them, and I'm ready to open them if</li> <li>39 need be.</li> <li>30 A. Yes. I have received them and</li> <li>31 declaration.</li> <li>30 A. Yes. I have received them and</li> <li>31 declaration.</li> <li>32 A. I do.</li> <li>33 A. I do.</li> <li>34 A. I do.</li> <li>34 A. I do.</li> <li>35 A. I do.</li> <li>35 A. I do.</li> <li>36 declaration.</li> <li>36 declaration.</li> <li>37 A. I does appear to be the first&lt;</li></ul>	7	popped up Exhibit 1003. Did you receive that?	7	For some reason it looks like there we
10       0. Sure. No problem.         11       A. Okay,         12       0. And your next two also should have been         13       sent over. The second one is Exhibit 1028 and         14       the third is Exhibit 1030.         15       (Whereupon, Dr. Ducharme         16       Deposition Exhibit Nos. 1030,         17       1028, and 1030 were remotely         18       electronically to the "movies"         19       electronically to the "movies"         20       reporter.)         21       THE WITNESS: I new I should have grabded a         22       second monitor. I can do that in a little         24       24         24       24         25       meyorive received thoes. The main reason I'm         26       A. Yes. I balieve have access to them.         3       A. Yes. I balieve have access to them.         4       when you've received those. The main reason I'm         4       declaration.         7       A. Yes. I have received them and         8       A. Yes. I have received them and         9       ned colaration, which is Exhibit 1003, and         17       meyou're received them and         8       A. Mai Can seeit, just to let you know. <td>8</td> <td>A. Yes. I'm just going to take a moment</td> <td>8</td> <td>go. The screen share doesn't appear to be</td>	8	A. Yes. I'm just going to take a moment	8	go. The screen share doesn't appear to be
11       A. Okay.       11       A. I opened Exhibit 1030. I'm looking         12       Q. And your next two also should have been       13       sent over. The second one is Exhibit 1028 and         13       sent over. The second one is Exhibit 1030.       14       the third is Exhibit 1030.         15       (Whereupon, Dr. Ducharme       0       0. Kay. Thank you. And then on Page 80.         16       Peposition Exhibit Nos. 1003.       14       Q. Okay. And then let's do the same         18       introduced and provided       19       electronically to the wither second one is Exhibit 1028 and         19       electronically to the wither second monitor. I can do that in a little       20       N Yeah. For some reason I'm just having         21       a little trouble with the files. Fold on. I'm opening 1028 now. I'm looking at i, looking       21       a little trouble with the files. Fold on. I'm         24       Page 7       1       declaration.       22       A Yeah. For some reason I'm is to imake sure the court reporter         2       0. Well, I can share the screen here to a have it pop up on the screen. Just let me know       3       A. Yea. I believe chiliti 1028 that you         3       have it pop up on the screen. Just let me know       4       delivered to me is my second declaration.       5         3       doulocade them, and I'm ready to open them if nee	9	to make a folder.	9	working all that well. Would you mind opening
12       0. And your next two also should have been         13       sent over. The second one is Exhibit 1028 and         14       the third is Exhibit 1030.         15       (Mereupon, Dr. Ducharme         16       Deposition Exhibit Nos. 1003,         17       1028, and 1030 were remotely         18       introduced and provided         19       electronically to the write         20       reporter.)         21       THE WITNESS: I knew I should have grabbed a         2       second monitor. I can do that in a little         2.3       second monitor. I can do that in a little         2.4       Page 7         1       BY ME. ABERAMIC:         2       Q. Well, I can share the screen here to         3       have it pop up on the screen. Just let ne know         4       downloaded them, and I'm ready to open them if         9       need be.         10       Q. Okay, Tim you. So we're looking at         14       A. And I can see it, just to let you know.         15       Q. Okay, Thank you. So we're looking at         16       the first page of Exhibit 1003. Do you see         17       A. I do.         18       Q. Okay, Thank you. Sow ye're looking at	10	Q. Sure. No problem.	10	Exhibit 1003 that I sent to you?
13       sent over. The second one is Exhibit 1028 and       13       declaration.         14       the third is Exhibit 1030.       14       0. Okay. Thank you. And then on Page 80.         15       (Whereupon, Dr. Ducharme       16       A. Yes.         16       Deposition Exhibit Nos. 1003.       17       0. Okay. Thank you. And then on Page 80.         17       1028, and 1030 were remotely       16       A. Yes.         18       introduced and provided       19       electronically to the growther.         20       THE WITNESS: I knew I should have grabbed a       20       A. Yeah. For some reason I'm just having         21       THE WITNESS: I knew I should have grabbed a       21       a little trouble with the files. Hold on. I'm         23       while.       22       opening 1028 now. I'm looking at it, looking at it. lookin	11	A. Okay.	11	A. I opened Exhibit 1003. I'm looking
14       the third is Exhibit 1030.       14       0. Okay. Thank you. And then on Page 80.         15       (Khereupon, Dr. Duchame       15       that's your signature: is that right?         16       Deposition Exhibit Nos. 1003.       16       A. Yes.         17       1022, and 1030 were remotely       16       A. Yes.         18       introduced and provided       16       A. Yes.         19       electronically to the sume       ewercise with the next two declarations. First         19       electronically to the sume       20         20       THE WITNESS: I kew I should have grabbed a       20         2       Weil. I can share the screen here to       3         3       have it pop up on the screen. Just let me know       4         4       when you've received them and       3       A. Yes. I believe Exhibit 1028 that you         2       0. Kay. Tim going to start with your       10       A. Met 's your signature on Page 31 of         16       first declaration, which is Exhibit 1003, and       10       A. Kay. Thak you. And let's do the         12       'm oging to pull it up here on the screen, I       14       9. Okay. Thak you. And I would like to         16       he first page of Exhibit 1003. Do you see       17       0. Nat, Yu. And I would like to	12	Q. And your next two also should have been	12	through it now. It does appear to be my first
15       (Whereupon, Dr. Ducharme         16       Deposition Exhibit Nos. 1003,         17       1028, and 1030 were remotely         18       introduced and provided         19       electronically to the survert,         21       THE WITNESS: I knew I should have grabbed a         28       second monitor. I can do that in a little         29       will.         20       . Yeah. For some reason I'm just having         21       THE WITNESS: I knew I should have grabbed a         28       second monitor. I can do that in a little         29       while.         20       Well, I can share the soreen here to         3       have it pop up on the screen. Just let me know         4       when you've received these. The main reason I'm         5       doing this is to make sure the court reporter         7       A. Yes. I believe Exhibit 1028 that you         4       declaration.         7       A. It is.         8       Q. Okay. Thak you. And let's do the         9       need be.         10       Q. Okay. Tim going to start with your         11       first declaration, which is Exhibit 1003, and         12       I'm going to pull it up here on the screen, I	13	sent over. The second one is Exhibit 1028 and	13	declaration.
16       Deposition Exhibit Nos. 1003, 1028, and 1030 were remotely introduced and provided       16       A. Yes.         18       introduced and provided       17       Q. Okay. And then let's do the same         19       electronically to the vertices with the next two declarations. First         20       reporter.)       20         21       THE WITNESS: I knew I should have grabbed a second monitor. I can do that in a little       A. Yes. For some reason I'm just having a little trouble with the files. Hold on. I'm opening 1028 now. I'm looking at it, looking 21         24       Page 7       10         25       WR. ABRAMIC:       2         2       Q. Well, I can share the screen here to 3 have it pop up on the screen. Just let me know 4 when you've received those. The main reason I'm 5 doing this is to make sure the court reporter	14	the third is Exhibit 1030.	14	Q. Okay. Thank you. And then on Page 80,
17       1028, and 1030 were remotely introduced and provided electronically to the sectorial to the further introduced and provided electronically to the sector reporter.)       17       0. Okay. And then let's do the same exercise with the next two declarations. First 19         19       electronically to the electronically to the second monitor. I can do that in a little       20       A. Yeah. For some reason I'm just having a little trouble with the files. Hold on. I'm opening 1028 now. I'm looking at it, looking 21         24       Page 7       1         24       Page 7       1         25       Q. Well, I can share the screen here to 3 have it pop up on the screen. Just let me know 4 when you've received these. The main reason I'm 5       1       declaration.         2       Q. Well, I can share the screen here to 3 have it pop up on the screen. Just let me know 4       3. Yes. I believe Exhibit 1028 that you 4       2         3       downloaded them, and I'm ready to open them if 9 need be.       0. Okay. Thak you. And let's do the 9 same thing with Exhibit 1030.       0. Okay. I have opened Exhibit 1030 that 11 first declaration, which is Exhibit 1003, and 12 I'm going to pull it up here on the screen, I 13 believe.       10       A. Mad I can see it, just to let you know. 15       Q. Okay. Thank you. So we're looking at 16 the first page of Exhibit 1003. Do you see 17 that, Dr. Ducharme?       14       A. I do. 19       Q. And does that appear to be the first 10       17       Q. Okay. Thank you. And I would like to 18       A. I do. 19       10       A.	15	(Whereupon, Dr. Ducharme	15	that's your signature; is that right?
18       introduced and provided         19       electronically to the         20       reporter.)         21       THE WITNESS: I knew I should have grabbed a         28       second monitor. I can do that in a little         29       while.         24       20         26	16	Deposition Exhibit Nos. 1003,	16	A. Yes.
19       electronically to the reporter.)       19       we'll start with Exhibit 0128.         20       reporter.)       20       A. Yeah. For some reason I'm just having         21       THE WITNESS: I knew I should have grabbed a       20       a little trouble with the files. Hold on. I'm         22       second monitor. I can do that in a little       20       a little trouble with the files. Hold on. I'm         23       while.       21       a little trouble with the files. Hold on. I'm         24       24       24       24         24       24       24       24       refresh my recollection of that particular         2       Q. Well, I can share the screen here to       a have it pop up on the screen. Just let me know       4       A. Yes. I believe Exhibit 1028 that you         4       Abrey received them and       3       A. Yes. I believe Exhibit 1028 that you       4         7       A. Yes. I have received them and       8       Q. Okay. Thank you. And let's do the       9         8       Q. Okay. I'm going to start with your       10       A. Okay. I have opened Exhibit 1030 that       10         9       Okay. Thank you. So we're looking at       15       16       16       thef irst page of Exhibit 1003. Do you see       15         17       that, Dr. Ducharme?	17	1028, and 1030 were remotely	17	Q. Okay. And then let's do the same
20       reporter.)       20       A. Yeah. For some reason I'm just having         21       THE WITNESS: I knew I should have grabbed a       a little trouble with the files. Hold on. I'm         22       second monitor. I can do that in a little       a little trouble with the files. Hold on. I'm         23       while.       a little trouble with the files. Hold on. I'm         24       20       pering 1028 now. I'm looking at it, looking         24       21       a little trouble with the files. Hold on. I'm         24       24       refresh my recollection of that particular         24       Page 7       I         2       0. Well, I can share the screen here to       a have it pop up on the screen. Just let me know         3       have received those. The main reason I'm       4         4       when you've received those. The main reason I'm       4         6       and Steve have access to them.       3       A. Yes. I believe Exhibit 1028 that you         6       and Steve have access to them.       5       Q. And that's your signature on Page 31 of         6       that document?       A. It is.       8       Q. Okay. Thank you. And let's do the         9       need be.       9       same thing with Exhibit 1030.       10         11       first declaration,	18	introduced and provided	18	exercise with the next two declarations. First
20       reporter.)       20       A. Yeah. For some reason 1'm just having         21       THE WITNESS: I knew I should have grabbed a       21       a little trouble with the files. Hold on. 1'm         22       second monitor. I can do that in a little       23       through very briefly, just going through it to         24       24       24       24       Page 9         1       EY MR. ABRAMIC:       2       Q. Well, I can share the screen here to       3       A. Yes. I believe Exhibit 1028 that you         3       have it pop up on the screen. Just let me know       4       4       A. Yes. I believe Exhibit 1028 that you         4       when you've received those. The main reason I'm       4       delivered to me is my second declaration.       5         5       doing this is to make sure the court reporter       5       Q. And that's your signature on Page 31 of         6       that document?       A. It is.       8       Q. Okay. Thank you. And let's do the         9       need be.       9       same thing with Exhibit 1030.       10         10       Q. Okay. I'm going to start with your       10       A. Okay. I have opened Exhibit 1030 that         11       first declaration, which is Exhibit 103, and       11       you delivered to me. Yes. And I believe that         12 <td< td=""><td>19</td><td>electronically to the alfred Duchares</td><td>19</td><td>we'll start with Exhibit 0128.</td></td<>	19	electronically to the alfred Duchares	19	we'll start with Exhibit 0128.
22       second monitor. I can do that in a little       22       opening 1028 now. I'm looking at it, looking         23       while.       23       through very briefly, just going through it to         24       24       24       Page 7         1       EY MR. ABRAMIC:       Page 7       1       declaration.       Page 9         1       EY MR. ABRAMIC:       2       0. Stre. Take your time.       3         3       have it pop up on the screen. Just let me know       4       delivered to me is my second declaration.       5         6       and Steve have access to them.       3       A. Yes. I balive ready to open them if       6         9       need be.       0.       Okay. I'm going to start with your       6       0. Okay. Thank you. And let's do the         11       first declaration, which is Exhibit 1003, and       10       O. Okay. Thank you. So we're looking at       10       O. Mady. I have opened Exhibit 1030 that         13       believe.       14       A. And I can see it, just to let you know.       14       Q. Thank you. And I believe that         13       believe.       14       Q. Okay. Thank you. And I would like to       15         14       A. And I can see it, just to let you know.       14       Q. Thank you. And I would like to	20		20	A. Yeah. For some reason I'm just having
23       while.       23       through very briefly, just going through it to         24       24       24       24       25         24       24       24       24       24       24         Page 7       24       24       24       24       24       24       26         Page 7       Page 9         1       BY ME. ARRAMIC:       Page 9         2       Q. Well, I can share the screen here to       A Stree your time.         A lease access to them.       Q. And that's your signature on Page 31 of         6       and Start with your         1       A. It is.         8       Q. Okay. Thank you. And let's do the         9         6       and the screen I'         A. Yes. I have received them and       8       Q. Okay. Thank you. And let's do the         9       A. It is.         8       Q. Okay. Thank you. And let's do the         11'm going to pull it up here on the screen, I         12       12       12	21	THE WITNESS: I knew I should have grabbed a	21	a little trouble with the files. Hold on. I'm
24       24       refresh my recollection of that particular         Page 9       1       BY MR. AERAMIC:       Page 9         1       BY MR. AERAMIC:       2       Q. Well, I can share the screen here to       3         3       have it pop up on the screen. Just let me know       4       A. Yes. I believe Exhibit 1028 that you         4       when you've received those. The main reason I'm       5       Q. And that's your signature on Page 31 of         6       and Steve have access to them.       7       A. It is.         7       A. Yes. I have received them and       8       Q. Okay. Thank you. And let's do the         9       need be.       9       same thing with Exhibit 1030.       10         10       Q. Okay. I'm going to start with your       10       A. Okay. I have opened Exhibit 1030 that       11         11       first declaration, which is Exhibit 1003, and       11       you delivered to me. Yes. And I believe that         13       believe.       14       A. And I can see it, just to let you know.       14       Q. Thank you. And then your signature is         15       Q. Okay. Thank you. So we're looking at       15       on Page 23 of that document?         16       the first page of Exhibit 1003. Do you see       16       A. That's correct.         17 </td <td>22</td> <td>second monitor. I can do that in a little</td> <td>22</td> <td>opening 1028 now. I'm looking at it, looking</td>	22	second monitor. I can do that in a little	22	opening 1028 now. I'm looking at it, looking
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10 to 13

	Page 10		Page 12
1	Q. Absolutely.	1	BY MR. ABRAMIC:
2	A. Can we hold just for one moment?	2	Q. Sure. Well, why don't I first
3	Oh, you probably heard that. I let my	3	establish that this is the actual Sasaki
4	wife know that the I thought it was going	4	reference that you're familiar with. So take a
5	great. And I need a piece of paper.	5	look at Exhibit 1006. And it's my understanding
6	Okay. I'm at Paragraph 64.	6	that this document is an English translation of
7	Q. Thank you. And if you take a look at	7	the Sasaki reference upon which you have based
8	Paragraph 64, would you agree that in this	8	your opinions. Could you please take a look at
9	paragraph you are describing conventional	9	that document and confirm that that is, indeed,
10	threaded screw mechanisms for attaching UAV	10	the translation of the Sasaki reference?
11	rotor blades?	11	A. Yes. This What you delivered to me
12	MR. PETERS: Object to form.	12	is Exhibit 1006 is the reference that I used
13	THE WITNESS: Taking that paragraph alone, I	13	in my declaration, the one that I'm familiar
14	agree it's describing typical threaded screws.	14	with.
15	There is nothing in that paragraph about UAVs.	15	Q. Thank you. So the question I have is
16	BY MR. ABRAMIC:	16	whether or not Sasaki discloses a quad rotor
17	Q. Okay. But there are It's your	17	that utilized a conventional threaded screw
18	understanding that UAVs in the prior art have	18	mechanism for attaching rotor blades?
19	used conventional threaded screw-type connection	19	A. Yes.
20	mechanisms for connecting rotor blades, correct?	20	Q. And if we go back to Paragraph 64 of
21	A. I'm sorry. Can you repeat the	21	Exhibit 1003, is that description of
22	question?	22	conventional screw mechanisms consistent with
23	Q. Sure. You're familiar with the fact	23	your understanding of the threaded screw
24	that UAVs, some UAVs, use conventional threaded	24	mechanism disclosed in Sasaki?
	Page 11		Page 13
1	screw connection mechanisms for fastening rotor	1	A. Yes.
1 2		1 2	-
	screw connection mechanisms for fastening rotor		<ul> <li>A. Yes.</li> <li>Q. So when a quad rotor uses a conventional threaded mechanism for attaching</li> </ul>
2	screw connection mechanisms for fastening rotor blades, right?	2	A. Yes. Q. So when a quad rotor uses a
2 3	screw connection mechanisms for fastening rotor blades, right? A. That is correct. Yes.	2 3	<ul> <li>A. Yes.</li> <li>Q. So when a quad rotor uses a conventional threaded mechanism for attaching</li> </ul>
2 3 4	<pre>screw connection mechanisms for fastening rotor blades, right? A. That is correct. Yes. Q. And you're familiar with the Sasaki reference; is that right?</pre>	2 3 4	<ul> <li>A. Yes.</li> <li>Q. So when a quad rotor uses a conventional threaded mechanism for attaching the propeller blades, the clockwise spinning</li> </ul>
2 3 4 5	<pre>screw connection mechanisms for fastening rotor blades, right? A. That is correct. Yes. Q. And you're familiar with the Sasaki reference; is that right?</pre>	2 3 4 5	<ul> <li>A. Yes.</li> <li>Q. So when a quad rotor uses a conventional threaded mechanism for attaching the propeller blades, the clockwise spinning driveshafts have a different thread direction</li> </ul>
2 3 4 5 6	screw connection mechanisms for fastening rotor blades, right? A. That is correct. Yes. Q. And you're familiar with the Sasaki reference; is that right? A. I am.	2 3 4 5 6	<ul> <li>A. Yes.</li> <li>Q. So when a quad rotor uses a conventional threaded mechanism for attaching the propeller blades, the clockwise spinning driveshafts have a different thread direction than the counterclockwise spinning driveshafts,</li> </ul>
2 3 4 5 6 7	screw connection mechanisms for fastening rotor blades, right? A. That is correct. Yes. Q. And you're familiar with the Sasaki reference; is that right? A. I am. Q. And Sasaki is one of the references on	2 3 4 5 6 7	A. Yes. Q. So when a quad rotor uses a conventional threaded mechanism for attaching the propeller blades, the clockwise spinning driveshafts have a different thread direction than the counterclockwise spinning driveshafts, correct?
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# DJI v. Autel IPR2019-00846

#### 14 to 17

	0 U I J I I		
	Page 14		Page 16
1	BY MR. ABRAMIC:	1	typical man or woman to damage by mere hand
2	Q. No. I'll repeat the question. So	2	pressure, then I don't believe it would be
3	would you agree that on a quad rotor that uses a	3	possible to screw that propeller onto that
4	conventional threaded screw mechanism for	4	shaft. So it is highly material dependent, tool
5	attaching the propeller blades, that it is	5	dependent, or person dependent as to whether or
6	possible to screw a left-hand threaded propeller	б	not it's possible.
7	blade onto a right-hand threaded driveshaft?	7	BY MR. ABRAMIC:
8	MR. PETERS: Same objection.	8	Q. Can we go to Exhibit 1028, and this is
9	THE WITNESS: No.	9	your second declaration. Take your time.
10	BY MR. ABRAMIC:	10	A. Yep. I'm there.
11	Q. So you're saying it's impossible to do	11	Q. Okay. Bear with me one second.
12	it?	12	A. I'm going to see if I can split screen.
13	MR. PETERS: Mischaracterizes.	13	It's a little difficult to look at the exhibit
14	THE WITNESS: You have to You have to	14	while watching you, so it's I'm going to try
15	define the bounds of what you consider to be	15	to get them both on the same screen here.
16	I'm sorry. Can you repeat the first part of the	16	Q. If you go to Paragraph 49 of your
17	question? I want to make sure I use the same	17	second declaration.
18	term that you did.	18	A. Okay.
19	BY MR. ABRAMIC:	19	Q. And the second sentence of that
20	Q. Sure. Would you agree that on a quad	20	paragraph states: Specifically, Dr. Reinholtz
21	rotor that has a conventional threaded screw	21	provides a video of himself forcing a blade from
22	mechanism for attaching the propeller blades,	22	a UAV apparently utilizing a conventional
23	that it is possible to screw a left-hand	23	screw-on attachment mechanism onto the wrong
24	threaded propeller blade onto a right-hand	24	driveshaft. Do you see that?
1	Page 15	1	Page 17
1	threaded driveshaft?	1	A. Yes.
		0	2 Public that contained and large this
2	A. Okay. I believe that you could take a	2	Q. And in that sentence are you describing
3	right-hand threaded propeller and damage it by	3	a video that Dr. Reinholtz made of himself
3 4	right-hand threaded propeller and damage it by engaging the threads on a left-hand threaded	3 4	a video that Dr. Reinholtz made of himself screwing what I'll call misthreading a blade,
3 4 5	right-hand threaded propeller and damage it by engaging the threads on a left-hand threaded shaft. Is it possible to get that propeller	3 4 5	a video that Dr. Reinholtz made of himself screwing what I'll call misthreading a blade, putting a blade on the wrong driveshaft?
3 4 5 6	right-hand threaded propeller and damage it by engaging the threads on a left-hand threaded shaft. Is it possible to get that propeller onto the shaft? Not without damage or	3 4 5 6	a video that Dr. Reinholtz made of himself screwing what I'll call misthreading a blade, putting a blade on the wrong driveshaft? A. Yes.
3 4 5 6 7	right-hand threaded propeller and damage it by engaging the threads on a left-hand threaded shaft. Is it possible to get that propeller onto the shaft? Not without damage or deformation or cross-threading, as I talked	3 4 5 6 7	<ul><li>a video that Dr. Reinholtz made of himself</li><li>screwing what I'll call misthreading a blade,</li><li>putting a blade on the wrong driveshaft?</li><li>A. Yes.</li><li>Q. And you reviewed that video?</li></ul>
3 4 5 6 7 8	right-hand threaded propeller and damage it by engaging the threads on a left-hand threaded shaft. Is it possible to get that propeller onto the shaft? Not without damage or deformation or cross-threading, as I talked about in my declaration.	3 4 5 6 7 8	<pre>a video that Dr. Reinholtz made of himself screwing what I'll call misthreading a blade, putting a blade on the wrong driveshaft?     A. Yes.     Q. And you reviewed that video?     A. Yes.</pre>
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### 18 to 21

	UULY 1.	, ,	
	Page 18		Page 20
1	portion. Correct?	1	types of materials and the thread used. And
2	A. Yes.	2	that video, you know, it didn't really go into
3	Q. And so that second sentence that I just	3	that detail, so.
4	read where it says, "The metal threads on the	4	Q. Okay. Well, let's take the instance
5	shaft lock portion are likely carving out new	5	that you described when you and the instance
6	notches in the blade lock portion," is that a	6	that I'm thinking of is the instance where
7	description of what you believe occurred when	7	Dr. Reinholtz misthreaded a blade. And let's
8	Dr. Reinholtz misthreaded the blade in the	8	assume that what happened is what you've
9	video?	9	described in your declaration here as the
10	A. Well, as I said in my declaration, I	10	threads on the shaft lock portion carved out new
11	believe it's likely.	11	notches in the blade lock portion. Can we
12	Q. Okay. And so what I guess what I'm	12	proceed based on that assumption?
13	trying to understand are what are the other	13	A. Okay.
14	possible scenarios? Is it possible that new	14	Q. And so in that instance where
15	notches were not carved out and the blade was	15	Dr. Reinholtz demonstrated misthreading a blade,
16	attached by some other mechanism?	16	you would at least agree that the blade is
17	A. Are you referring specifically to the	17	engaged in the lock mechanism, correct?
18	video? What possibly could have occurred in the	18	A. I believe in this case the notches and
19	video bogidog a garving out?	19	lugs are the threads, and they're not engaged.
20	Q. Sure. Yeah. One possibility, based on	20	Q. Okay. So it's your opinion that when a
21	your declaration here, is that the threads	21	blade is misthreaded, like Dr. Reinholtz
22	carved out new notches in the blade lock	22	demonstrated in his video, that that blade is
23	portion. What are the other possible	23	not engaged in the lock mechanism, right?
24	explanations, if there are any?	24	A. Yes.
27	explanations, if there are any:	21	A. 165.
	Dama 10		Dama 01
1	Page 19 A. The only other The only scenario, in	1	Page 21 Q. Okay. And what is your understanding
2	general, is that the notches and lugs, you know,	2	of the word "engaged" in the context of the '184
3	the threads, are not engaged. There may be	3	patent?
4	other ways that that propeller got onto that	4	A. I'm going to go ahead and refer to my
5	shaft, but all of the ways that I can conceive	5	declaration here. I'm just scrolling up to the
6	of, the threads are not engaged. The threads	6	engagement limitation.
7	that were present on the propeller and on the	7	Q. Sure.
8	shaft before the attachment was attempted are	8	A. Yeah. I mean my understanding of the
9	damaged. So I could yeah.	9	engagement limitation comes from Claim 1,
10	Q. So, in your opinion, the threads had to	10	"Wherein the clockwise rotor blade is engageable
11	have been damaged in order to attach the blade?	11	only with the clockwise lock mechanism and
12	A. I really don't know. As I've said in	12	cannot be engaged in the clockwise
13	my declaration, it what occurs is very it	13	counterclockwise lock mechanism, and the
14	relates very specifically to the materials that	14	counterclockwise rotor blade is engageable only
15	were used and the pitch of the thread, you know.	15	with the counterclockwise lock mechanism and
16	Yeah. I'll leave it at that.	16 17	cannot be engaged in the clockwise lock
17	Q. If we assume that the threads in the	17	mechanism." I believe the plain and ordinary
18	video, the prop threads were plastic and the	18	reading of that Claim No. 1 is the engagement
19	shaft threads were metal, is it possible that	19	limitation.
20	instead of there being a carving out as you	20	Q. Okay. But I'm not asking about the
21	say in your declaration that the softer	21	engagement limitation. I'm asking about the
22	threads on the prop shaft were deformed during	22	word "engage." What is your understanding of
23	the rotating onto the driveshaft?	23	the plain and ordinary meaning of the word
24	A. I really don't know. It depends on the	24	"engage" in the context of the '184 patent?

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22 to 25

	UULY I.	,	
1	Page 22 A. Hold on one second. Let me just review	1	Page 24
2	for a second.	2	Q. Okay. And so there is going to be
3	Q. Sure.	3	interaction in that instance between the threads
4	A. I guess I would describe I would	4	of the shaft and the threads of the blade,
5	describe engagement as the meeting of two	5	right?
6	interlocking mechanical parts.	6	A. Yes. I'm sorry. There's please
7	Q. Let's go back to the scenario that we	7	repeat that. Because you said an interaction
8	were talking about where a blade is misthreaded,	8	between the threads and the shaft and the
9	and, as you've described, the metal threads are	9	threads in the blade, correct?
10	carving out new notches in the plastic threads,	10	Q. Correct.
11	that scenario. Can we talk about that?	11	A. And in this instance, depending on the
12	A. Yes. Sure.	12	pitch, the size of the threads, I have no idea
13	Q. In that instance, the threads Well,	13	what that interaction is. So what I described
14	in that instance, what's holding the propeller	14	as a cross-threading or a crossing of those,
15	blade onto the driveshaft?	15	that would be the interaction.
16	A. I don't know. I didn't physically, you	16	Q. You had talked about the engagement
17	know, interact with that plastic propeller and	17	limitation response to one of the previous
18	that shaft, so I don't I don't know I	18	questions, and you had gone to your declaration,
19	don't know.	19	one of your declarations. I want to ask you
20	Q. Okay. Well	20	about the engagement limitation, but I just want
21	A. I could hypothetically create a	21	to make sure I'm on the same page with you.
22	situation where I could imagine it, but is that	22	Which declaration did you turn to for that?
23	what you'd like me to do?	23	A. I believe I was just reading Claim 1.
24	Q. Yes, please.	24	So it could have been from any of them. But I
	<b>D</b>		
1	Page 23 A. If you were to take a soft plastic	1	Page 25 was specifically reading from Exhibit 1028. It
2	propeller and misthread it onto a shaft, it's	2	just happened to be the one that was open.
3	really just the forces of deformation of the	3	Q. Let's go to Exhibit 1030, if you would.
4	softer material on the harder material.	4	A. Okay. I'm there.
5	Q. Okay. And so when you You misthread www.wispinger.com	5	Q. And if you would go to Paragraph 23.
6	the propeller blade and it's attached meaning	6	A. Yes.
7	you can't pull it off what forces are keeping	7	Q. Would you agree that Paragraph 23
8	you from being able to pull that blade off?	8	recites the engagement limitation?
9	A. Well, as I've described in the	9	A. It recites Claim 1 in Paragraph 23.
10	declaration, in the event that new notches had	10	Q. Well, Paragraph 23 is not the entirety
11	been carved out, the you know, the new	11	of the Claim 1, correct? That's just the
12	forces well, let me take Let me start	12	engagement limitation?
13	again.	13	A. Yeah. That's correct, yes. It's an
14	So in the case of the carved-out	14	excerpt in Claim 1.
15	threads, it's really the pressure of the sides	15 16	Q. And the excerpt is what the parties have been referring to as the engagement
16	of the blade how, you know the mechanical construct around where the hole for the threads	16 17	nave been referring to as the engagement limitation. Is that your understanding?
17		17 18	
18	are, that material is pushing against the shaft.	18	A. That is my understanding, yes.
19	The carving out can be a removal of material, or	19 20	Q. So in the context of the engagement
20	it could be a I'm trying to think of the	20 21	limitation, for a rotor blade to be engageable
21 22	right word like a bending of the material. Q. Okay. And so	21 22	with a lock mechanism, do lugs have to be engageable with notches?
22	A. And the force is The force is just	22	MR. PETERS: Object to scope. Calls for a
23	the pressure of the housing pushing against the	23 24	legal conclusion.
1 2.7	THE PROPAGE OF THE HEADING PARITING AGAINDE CHE	_ <u> </u>	000000000000000000000000000000000

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#### 26 to 29

	JULY I.	, כ	2020 26 10 29
1	Page 26 THE WITNESS: Yeah. I really don't know how	1	Page 28 clockwise rotor blades can only be fastened to
2	to answer that question. I'm sorry.	2	the clockwise driveshafts, and the
3	BY MR. ABRAMIC:	3	counterclockwise rotor blades can only be
4	0. Do all UAV blade connection mechanisms	4	fastened to the counterclockwise driveshafts.
5	have to use lugs and notches?	5	Do you understand that hypothetical?
6	MR. PETERS: Objection. Calls for	6	A. Not really, because I can't I can't
7	speculation.	7	envision because it's a hypothetical, I can't
8	THE WITNESS: I really don't know the answer	8	really envision exactly what makes that
9	to that question either.	9	determination. For example, let's just say that
10	BY MR. ABRAMIC:	10	you said that the clockwise O-rings were green
11	Q. Can you think of a UAV blade connection	11	and counterclockwise O-rings were red. That
12	mechanism that does not use lugs and notches?	12	doesn't make a mechanical determination.
13	A. I'm trying to think. I've seen a lot	13	Someone has to look at it. In that example that
14	of propellers in the last ten years. Yes.	14	I just used of red and green O-rings is
15	Q. And what are you thinking of?	15	typically I mean for a long time, that's
16	A. Similarly to the micro drones reference	16	that's how people assured that they were getting
17	that we use, there are some UAVs that utilize an	17	the correct propellers on the correct motors was
18	elastic, elastomeric-type like rubber band or	18	colors.
19	what's referred to as an O-ring to hold the autom	10	Q. Yeah. But in that instance, a color
20	propeller on to the driveshaft with the	20	difference wouldn't prevent the installation of
21	without the lugs and notches.	20	the wrong blade, right?
21	Q. Okay. So Thank you very much.	22	A. That's absolutely correct.
23	That's a good example for us to use.	23	Q. Okay. And what I'm asking you is to
24	So let's imagine a UAV that uses	24	envision a scenario where the specific design of
21	bo ice b imagine a onv chae abes	21	chvision a sectario where the specific design of
	Page 27		Page 29
1	O-rings to connect the rotor blades, and it does	1	the O-ring for some reason did prevent
2	not use lugs and notches. And now imagine that	2	installation of the wrong blade. Are you saying
3	the O-rings were designed somehow such that the	3	you just can't You can't imagine that
4	clockwise rotor blades were installed using one	4	scenario?
5	type of O-ring and counterclockwise O-rings	5	A. Yeah. For some reason it needs to be
б	I'm sorry counterclockwise rotor blades were	6	defined a little bit more for me to give an
7	installed with some other type of O-ring. This	7	opinion on it. I mean I can honestly I
8	is just a hypothetical scenario.	8	can't I was going to say that I could think
9	A. Okay.	9	of some reason and then but I really can't.
10	Q. But that the clockwise rotor blades	10	I can't envision what would be special about an
11	could only be attached to clockwise driveshafts	11	0-ring.
12	and vice versa. Do you understand that	12	Q. All right. Well, then let's try a
13	hypothetical?	13	different hypothetical. Let's assume a
14	A. Well, "can only be" requires someone,	14	connection mechanism that doesn't use O-rings
15	you know, looking at it and making the	15	but uses magnets.
16	determination, right? There's nothing	16	A. Okay.
17	mechanically that makes that decision in your	17	Q. Okay. So can you imagine a connection
18	hypothetical, if I'm understanding it correctly.	18	mechanism where a rotor blade was connected to
19	Q. In the hypothetical, there I can't	19	the driveshaft somehow with magnetic force where
20	describe the exact design of the O-ring, but the	20	there was no lugs and notches involved?
21	O-rings, there are two different types of	21	A. I'll accept the hypothetical. I can't
22	O-rings: one for clockwise rotor blades, one	22	personally envision it.
23	for counterclockwise rotor blades. And the	23	Q. Okay. So accepting the hypothetical
24	specific design of the O-rings ensures that the	24	A. And I say that I say that just

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	oury r.	, ,	2020 50 20 55
1	Page 30	1	Page 32
1 2	because that particular example that you use has	1	mechanism in the context of the engagement limitation?
	very limited attraction force. So I you		
3	know, as an engineer, I have difficulty with it.	3	MR. PETERS: Same objections.
4	Q. I understand. I understand. But let's	4	THE WITNESS: I don't believe so.
5	assume you have enough attraction force to	5	BY MR. ABRAMIC:
6	attach the blade using the magnets.	6	Q. And is that because it's your
7	A. Okay.	7	understanding that the engagement limitation
8	Q. You use one polarity for the clockwise	8	requires the engagement of lugs and notches?
9	lock mechanism, another polarity for the	9	A. Yes.
10	counterclockwise lock mechanism, such that you	10	Q. Can we turn to Exhibit 1003, your first
11	can't attach a clockwise blade to a	11	declaration?
12	counter-clockwise driveshaft. Do you understand	12	A. Yes. I'm there.
13	that?	13	Q. Thank you. And I'm looking at
14	A. Okay. I do.	14	Paragraph 45.
15	Q. In that instance, would the rotor blade	15	A. Okay. I'm there at 45.
16	be engageable only with the clockwise lock	16	Q. Thank you. And at the end of Paragraph
17	mechanism in the context of the engagement	17	45, there's a sentence that says: The
18	limitation?	18	well-understood concept drove manufacturers of
19	MR. PETERS: Object to scope. Calls $f_{OCL number of transformer of the scope}$	19	commercial UAVs to "mistake proof" the coupling
20	speculation.	20	between the propeller assembly and the
21	THE WITNESS: Yeah. If you could I would	21	driveshaft to ensure users attached the
22	need to understand mechanically where these	22	propellers to the correct driveshaft.
23	magnets were. If the magnets are protruding and	23	Do you see that?
24	fitting into grooves in the motor then, you	24	A. Yes.
1	Page 31 know, that's a notch and a lug. So I	1	Page 33 Q. And by mistake proofing, you mean that
2	BY MR. ABRAMIC:	2	manufacturers of commercial UAVs wanted to
3	Q. No. That	3	devise systems that would prevent attaching the
4	A. I can't answer based on what I know of	4	wrong blades in the way that Dr. Reinholtz
5	the example.	5	attached the wrong blade in his video, right?
6	Q. Sure. So the hypothetical has no lugs	6	A. Yes.
7	and notches in the connection mechanism.	7	Q. When you say in this sentence that "the
8	That's And that's the point I'm trying to get	8	well-understood concept drove manufacturers of
9	at, which is whether or not the engagement	9	commercial UAVs to mistake proof," that when
10	limitation requires the engagement of lugs and	10	you say "the well-understood concept," what
11	notches. So in this hypothetical, there are no	11	concept are you referring to? Isn't it the fact
12	lugs and notches that assist in the connecting	12	that if you put the wrong blade on, you're going
13	of the blade to the driveshaft. It's merely	13	to generate a down force as opposed to a
14	magnetic forces. And the only reason we're	14	vertical force?
15	doing the hypothetical is so I can get your	15	A. Yeah. I mean the sentence before that
16	understanding of whether or not the engagement	16	is you know, would not be controllable if
17	limitation requires the engagement of lugs and	17	the if a motor had an incorrect propeller.
18	notches. So in that instance, the one we just	18	Q. How long were people of skill in the
19	described a hypothetical blade connection	19	art aware of that concept? How far back, I
20	mechanism that used magnetic forces where there	20	guess I'm sorry. How far back would you say
21	-		
21	are no lugs and notches where a clockwise rotor	21	people of skill in the art were aware of that
22	are no lugs and notches where a clockwise rotor blade cannot be attached to a counterclockwise	21 22	people of skill in the art were aware of that concept?
22	blade cannot be attached to a counterclockwise	22	concept?
	-		

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1	quadcopter or a multi-rotor copter is that some	1	Q. When you say "they are in the art," are
2	of the propellers spin one way and some of the	2	you saying that they existed only on paper as
3	propellers spin the other way, and that's to	3	of, for example, 1991?
4	counteract the off force. So when you're	4	A. I really don't know. Well, I know that
5	putting one of these kinds of aircraft together,	5	they existed on paper, but I really don't know
6	you have to make sure the right propellers go on	6	when physical realizations were, you know,
7	the right motors. There's other concepts	7	available. That's why I mentioned the date of
8	downstream as well. You have to make sure that	8	2010, because that was really when you first
9	the motor is spinning in the correct direction,	9	started to see these, you know, numerous people
10	you have to make sure that the flight controller	10	using them. I realize in the art there's this
11	knows where that motor is. It's a lot of	11	toy from Sasaki and but the question was when
12	details. But if the flight controller doesn't	12	did people when did I believe this concept
13	know the rotations of all the motors, then it	13	was well, I really believe, you know, it's
14	can't control its flight, it can't control its	14	the concept of having the correct propeller on
15	attitude. So since the very first aircraft.	15	the correct motor was something that was
16	Q. Can you put a date on that? I won't	16	I'm trying to say this the right way here was
17	hold I know it's going to be an	17	something that was realized when quadcopters
18	approximation, but.	18	became prevalent. That's what I'm trying to
19	A. 2010.	19	say.
20	Q. And so it's your understanding that	20	Q. So you're saying at the time of Sasaki,
21	2010 is the first time that a quad rotor aerial	21	a person of skill in the art of UAVs would not
22	vehicle was made?	22	have had an understanding of the need for
23	A. No. It was a bit before that date, but	23	attaching the correct blades on the correct
24	it was very sparse. And it wasn't until 2010	24	driveshafts?
1	Page 35	1	Page 37
1	that commercial flight controllers were	1	A. You know what, I referring to my
2	that commercial flight controllers were available to build these crafts. So I really	2	A. You know what, I referring to my declaration, I really was considering a person
2 3	that commercial flight controllers were available to build these crafts. So I really think of the start of multi-rotor aircraft as	2 3	A. You know what, I referring to my declaration, I really was considering a person of skill having ordinary skill in the art
2 3 4	that commercial flight controllers were available to build these crafts. So I really think of the start of multi-rotor aircraft as being, you know, the prevalence, I'll say, 2010.	2 3 4	A. You know what, I referring to my declaration, I really was considering a person of skill having ordinary skill in the art around the timeframe of 2013. So I really I
2 3 4 5	<pre>that commercial flight controllers were available to build these crafts. So I really think of the start of multi-rotor aircraft as being, you know, the prevalence, I'll say, 2010. Q. Okay. Could you go to Sasaki. That's</pre>	2 3 4 5	A. You know what, I referring to my declaration, I really was considering a person of skill having ordinary skill in the art around the timeframe of 2013. So I really I didn't render an opinion really on what person
2 3 4 5 6	<pre>that commercial flight controllers were available to build these crafts. So I really think of the start of multi-rotor aircraft as being, you know, the prevalence, I'll say, 2010.     Q. Okay. Could you go to Sasaki. That's     Use the term of the start of the</pre>	2 3 4 5 6	A. You know what, I referring to my declaration, I really was considering a person of skill having ordinary skill in the art around the timeframe of 2013. So I really I didn't render an opinion really on what person of skill a POSITA would have had in 1989 or
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	Page 38		Page 40
1	generate the wrong or thrust in the wrong	1	usability because, quote, a user can assemble
2	direction or lift in the wrong direction, right?	2	and disassemble the propellers with only a half
3	A. Yes.	3	turn as compared with three to four turns.
4	Q. And you had mentioned that that concept	4	Do you see that?
5	would have been well understood by a person of	5	A. Yes.
6	skill in the art dating back to the first time	6	Q. And so the reference to three to four
7	that someone made a flying quadrotor, right?	7	turns is a reference to the conventional
8	A. That's true. I did say that.	8	threaded connection mechanisms we were talking
9	Q. And do you have an understanding as to	9	about earlier that are described in Sasaki where
10	when the first quadrotor vehicle that you can	10	you have to spin the propeller blade several
11	imagine was made?	11	revolutions onto the shaft to get it connected,
12	A. Do I know?	12	right?
13	Q. Yes.	13	A. Yes.
14	A. I mean yeah. Hold on one second.	14	Q. And this reference to only one half
15	I'm on the internet, if that's okay. I just	15	turn is a reference to the fact that, in your
16	can't remember the person's name. Maybe it	16	proposed combination of Sasaki and Sokn, you
17	doesn't really matter. I just am trying to be	17	would not have to rotate the blade a full
18	correct. It was the turn of the century. It	18	revolution. It would only be a half turn,
19	was a Frenchman, L'Obertain (ph.), I believe his	19	right?
20	name is. I mean it's very old, the first	20	A. Yes.
21	quadcopter. There were counter-rotating	21	Q. And that difference, you were saying,
22	propellers, as I understand. There's very	22	improves usability, right?
23	little information on it. I guess my answer	23	A. It has improved mechanical alignment.
24	should be: A long time ago.	24	Q. Right. And it also says
	<b>D</b> 20		
1	Page 39 Q. Can you go to Exhibit 1028?	1	Page 41 A. And improved usability. That's
2	A. Okay. I'm there.	2	correct.
3	Q. Paragraph 42.	3	Q. Okay. Why does it improve usability?
4	A. Okay.	4	A. It's just quicker for a user to put a
5	Q. And in the last sentence of that	5	propeller on a shaft.
6	paragraph you're talking about the what I'll	6	Q. So it's more convenient, right? You
7	call is the quick-turn connection mechanism. So	7	just pop it on there really quick instead of
8	it's your understanding that the currently	8	spinning it around the shaft?
9	pending proposed amended claims include a	9	MR. PETERS: Object to form.
10	limitation requiring the rotation of the blade	10	THE WITNESS: Yes.
11	to be loss then a full usualution; is that	11	BY MR. ABRAMIC:
11	to be less than a full revolution; is that		
11	correct?	12	Q. Was there a need in the UAV industry at
		12 13	Q. Was there a need in the UAV industry at the time of the '184 patent invention to improve
12	correct?		_
12 13	correct? A. I'm going to refer to my third	13	the time of the '184 patent invention to improve
12 13 14	correct? A. I'm going to refer to my third declaration, just because I know that I have the	13 14	the time of the '184 patent invention to improve usability of blade connection mechanisms?
12 13 14 15	correct? A. I'm going to refer to my third declaration, just because I know that I have the amended claims there.	13 14 15	the time of the '184 patent invention to improve usability of blade connection mechanisms? MR. PETERS: Object to form.
12 13 14 15 16	correct? A. I'm going to refer to my third declaration, just because I know that I have the amended claims there. Q. Sure.	13 14 15 16	the time of the '184 patent invention to improve usability of blade connection mechanisms? MR. PETERS: Object to form. THE WITNESS: What was the date that you
12 13 14 15 16 17	<pre>correct?    A. I'm going to refer to my third declaration, just because I know that I have the amended claims there.    Q. Sure.    A. And they've changed enough that it's</pre>	13 14 15 16 17	the time of the '184 patent invention to improve usability of blade connection mechanisms? MR. PETERS: Object to form. THE WITNESS: What was the date that you said? 2013?
12 13 14 15 16 17 18	<pre>correct?    A. I'm going to refer to my third declaration, just because I know that I have the amended claims there.    Q. Sure.    A. And they've changed enough that it's confusing now, so.</pre>	13 14 15 16 17 18	<pre>the time of the '184 patent invention to improve usability of blade connection mechanisms?     MR. PETERS: Object to form.     THE WITNESS: What was the date that you said? 2013? BY MR. ABRAMIC:</pre>
12 13 14 15 16 17 18 19	<pre>correct?    A. I'm going to refer to my third declaration, just because I know that I have the amended claims there.    Q. Sure.    A. And they've changed enough that it's confusing now, so.    Yeah. It's bipartial rotation.</pre>	13 14 15 16 17 18 19	<pre>the time of the '184 patent invention to improve usability of blade connection mechanisms?     MR. PETERS: Object to form.     THE WITNESS: What was the date that you said? 2013? BY MR. ABRAMIC:     Q. Yeah. At the time of the inventions of</pre>
12 13 14 15 16 17 18 19 20	<pre>correct?    A. I'm going to refer to my third declaration, just because I know that I have the amended claims there.    Q. Sure.    A. And they've changed enough that it's confusing now, so.     Yeah. It's bipartial rotation.    Q. Okay. And then if you go back to</pre>	13 14 15 16 17 18 19 20	<pre>the time of the '184 patent invention to improve usability of blade connection mechanisms?     MR. PETERS: Object to form.     THE WITNESS: What was the date that you said? 2013? EY MR. ABRAMIC:     Q. Yeah. At the time of the inventions of the '184 patent.</pre>
12 13 14 15 16 17 18 19 20 21	<pre>correct?    A. I'm going to refer to my third declaration, just because I know that I have the amended claims there.    Q. Sure.    A. And they've changed enough that it's confusing now, so.     Yeah. It's bipartial rotation.    Q. Okay. And then if you go back to Paragraph 42 of Exhibit 1028.</pre>	13 14 15 16 17 18 19 20 21	<pre>the time of the '184 patent invention to improve usability of blade connection mechanisms?     MR. PETERS: Object to form.     THE WITNESS: What was the date that you said? 2013? EY MR. ABRAMIC:     Q. Yeah. At the time of the inventions of the '184 patent.     A. Yes. Actually, can I strike that? I</pre>
12 13 14 15 16 17 18 19 20 21 22	<pre>correct?    A. I'm going to refer to my third declaration, just because I know that I have the amended claims there.    Q. Sure.    A. And they've changed enough that it's confusing now, so.     Yeah. It's bipartial rotation.    Q. Okay. And then if you go back to Paragraph 42 of Exhibit 1028.    A. Okay.</pre>	13 14 15 16 17 18 19 20 21 22	<pre>the time of the '184 patent invention to improve usability of blade connection mechanisms?     MR. PETERS: Object to form.     THE WITNESS: What was the date that you said? 2013? BY MR. ABRAMIC:     Q. Yeah. At the time of the inventions of the '184 patent.     A. Yes. Actually, can I strike that? I don't know if I can strike that.</pre>

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		, , 	
	Page 42	-	Page 44
1	Q. Did people in the industry think that	1	when I started my company, so.
2	that feature, improving that feature, mattered?	2	Q. Do you make a distinction in your mind
3	MR. PETERS: Object to form. Calls for	3	between what today we might call a drone and
4	speculation.	4	what Sasaki called a flying toy?
5	THE WITNESS: I think in general people want	5	A. Yeah, a bit. It has more to do with
6	to make things easier to use.	6	the intelligence on board. So toys tend to be
7	BY MR. ABRAMIC:	7	controlled by a user, or they just fly around
8	Q. So in your opinion was there a need for	8	randomly. I have a bunch of these little toys.
9	improving usability in the UAV industry at the	9	But a drone or what really everybody says is
10	time of the '184 patent invention?	10	a UAV, classifies as an unmanned aerial
11	A. I really don't know if there was a need	11	vehicle is on demand and a bit autonomous.
12	for it.	12	So I tend to think of UAVs as being these smart
13	MR. PETERS: Excuse me. I'm sorry for	13	devices.
14	interrupting, but can you guys hear me?	14	Q. So you wouldn't include flying toys
15	MR. ABRAMIC: Yes.	15	under the description of UAVs?
16	MR. PETERS: Okay. John, I lost your audio	16	A. Well, I don't know. I don't Let me
17	for the last question, but I have the transcript	17	just refer to my declaration and see if I made
18	so I think we can continue.	18	any comments on that.
19	MR. ABRAMIC: Okay. We've been going about.	19	I mean I do refer to Sasaki as his UAV.
20	an hour; why don't we take a 10-minute break.	20	There's a level of abstraction I think here that
21	THE WITNESS: Okay.	21	goes back and forth. UAV is any aircraft in
22	(Short break taken.)	22	this case defined as a body with four arms
23	BY MR. ABRAMIC:	23	extending, you know, with motors and
24	Q. Dr. Ducharme, I want to turn back to	24	propellers and we call that a UAV in this
	Page 43		Page 45
1	$\begin{array}{c} {\rm Page} \ 43 \\ {\rm one \ of \ your \ answers.} & {\rm We \ were \ talking \ about \ the} \end{array}$	1	Page 45 context.
1 2	3	1 2	
	one of your answers. We were talking about the		context.
2	one of your answers. We were talking about the advent of UAVs, and you had mentioned that you	2	context. Q. Okay. Thanks. I'm going to show
2 3	one of your answers. We were talking about the advent of UAVs, and you had mentioned that you viewed 2010 as sort of the start of the	2 3	context. Q. Okay. Thanks. I'm going to show attempt to share another exhibit with you.
2 3 4	one of your answers. We were talking about the advent of UAVs, and you had mentioned that you viewed 2010 as sort of the start of the prevalence of UAVs. And you made a reference to	2 3 4	context. Q. Okay. Thanks. I'm going to show attempt to share another exhibit with you. (Whereupon, Dr. Ducharme
2 3 4 5	one of your answers. We were talking about the advent of UAVs, and you had mentioned that you viewed 2010 as sort of the start of the prevalence of UAVs. And you made a reference to commercial flight controllers. Could you	2 3 4 5	context. Q. Okay. Thanks. I'm going to show attempt to share another exhibit with you. (Whereupon, Dr. Ducharme Deposition Exhibit No. 2010
2 3 4 5 6	one of your answers. We were talking about the advent of UAVs, and you had mentioned that you viewed 2010 as sort of the start of the prevalence of UAVs. And you made a reference to commercial flight controllers. Could you	2 3 4 5 6	context. Q. Okay. Thanks. I'm going to show attempt to share another exhibit with you. (Whereupon, Dr. Ducharme Deposition Exhibit No. 2010 was remotely introduced and
2 3 4 5 6 7	one of your answers. We were talking about the advent of UAVs, and you had mentioned that you viewed 2010 as sort of the start of the prevalence of UAVs. And you made a reference to commercial flight controllers. Could you explain to me why you view 2010 as the start of the prevalence of UAVs?	2 3 4 5 6 7	context. Q. Okay. Thanks. I'm going to show attempt to share another exhibit with you. (Whereupon, Dr. Ducharme Deposition Exhibit No. 2010 was remotely introduced and provided electronically to the
2 3 4 5 6 7 8	one of your answers. We were talking about the advent of UAVs, and you had mentioned that you viewed 2010 as sort of the start of the prevalence of UAVs. And you made a reference to commercial flight controllers. Could you explain to me why you view 2010 as the start of the prevalence of UAVs? A. Yeah. I mean it's partly because of my	2 3 4 5 6 7 8	context. Q. Okay. Thanks. I'm going to show attempt to share another exhibit with you. (Whereupon, Dr. Ducharme Deposition Exhibit No. 2010 was remotely introduced and provided electronically to the reporter.)
2 3 4 5 6 7 8 9	one of your answers. We were talking about the advent of UAVs, and you had mentioned that you viewed 2010 as sort of the start of the prevalence of UAVs. And you made a reference to commercial flight controllers. Could you explain to me why you view 2010 as the start of the prevalence of UAVs? A. Yeah. I mean it's partly because of my history. So I started my company in 2010, and	2 3 4 5 6 7 8 9	context. Q. Okay. Thanks. I'm going to show attempt to share another exhibit with you. (Whereupon, Dr. Ducharme Deposition Exhibit No. 2010 was remotely introduced and provided electronically to the reporter.) BY MR. ABRAMIC:
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#### 46 to 49

	A		
1	Page 46 Q. Okay. And then the first page of this	1	Page 48 haven't read this disclosure. "In general a
2	document states that it's an expert report of	2	POSITA would have understood the need." I
3	Dr. Juan J. Alonso. Do you see that?	3	see I understand the sentence. I believe
4	A. Yes.	4	it's correct. When he says "understood the
5	Q. Do you know Dr. Alonso?	5	need," I don't know exactly what need he's
6	A. The same sounds familiar, but I don't	6	referring to or if that's or if it's more
7	know if I know him.	7	it should be more of a desire, "would have
8	Q. You've never spoken with Dr. Alonso?	8	understood the desire to overcome the
9	A. I really couldn't say. I I don't	9	limitations." I mean "desire" being a little
10	remember doing so, but if I search through my	10	less strong. "Need" seems to imply that you
11	e-mails if he's in the UAV industry, there's	11	have to. "In order to fly UAV you have to
12	a chance I probably talked to him, but I don't	12	overcome these limitations," and that's maybe
13	recall.	13	not completely true.
14	Q. Do you have an understanding that	14	BY MR. ABRAMIC:
15	Dr. Alonso was DJI's expert at an International	15	Q. Okay. So let's Dr. Alonso
16	Trade Commission proceeding that related, at	16	identifies a number of, what he calls,
17	least in part, to the '184 patent?	17	limitations of Sasaki in this sentence. Let's
18	A. I not really, no.	18	break it down to make it easier. One of the
19	Q. Okay. Well, I will represent to you	19	limitations he refers to, the language he uses
20	that this is an expert report from Dr. Alonso	20	is "less error prone." Do you see that?
21	submitted in an International Trade Commission	21	A. No. We're both looking at Appendix
22	proceeding where the '184 patent was at issue.	22	A2, still, right?
23	Dr. Alonso was DJI's expert. And if I said this	23	Q. Yes. And it's the same sentence that I
24	was the expert report, I should clarify and say	24	just read.
			5
	Page 47		Page 49
1	Page 47 it's just excerpts. But if you go to Page 3 of	1	Page 49 A. Oh, less error prone. Yeah. I'm
1 2	3	1 2	
	it's just excerpts. But if you go to Page 3 of		A. Oh, less error prone. Yeah. I'm
2 3 4	<pre>it's just excerpts. But if you go to Page 3 of that document, and you may have to rotate the view to see it. A. Yes. I've rotated it.</pre>	2	A. Oh, less error prone. Yeah. I'm sorry. I was looking below it, and I couldn't
2 3 4 5	it's just excerpts. But if you go to Page 3 of that document, and you may have to rotate the view to see it.	2 3 4 5	A. Oh, less error prone. Yeah. I'm sorry. I was looking below it, and I couldn't find I was looking for the word prone. Okay.
2 3 4 5 6	<pre>it's just excerpts. But if you go to Page 3 of that document, and you may have to rotate the view to see it. A. Yes. I've rotated it.</pre>	2 3 4	A. Oh, less error prone. Yeah. I'm sorry. I was looking below it, and I couldn't find I was looking for the word prone. Okay. Yes. And what was the question again? I
2 3 4 5	<pre>it's just excerpts. But if you go to Page 3 of that document, and you may have to rotate the view to see it. A. Yes. I've rotated it. Q. Okay. And in the second full paragraph in that table there on Page 3 of the exhibit, there's a sentence that starts with, "In</pre>	2 3 4 5	<ul> <li>A. Oh, less error prone. Yeah. I'm sorry. I was looking below it, and I couldn't find I was looking for the word prone. Okay.</li> <li>Yes. And what was the question again? I apologize.</li> </ul>
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DJI v. Autel IPR2019-00846

## 50 to 53

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	Page 50		Page 52
1	satisfied the propellers and motors being	1	we talked already about one particular feature,
2	less error prone. I mean they weren't error	2	which I called the quick twist, and that is this
3	prone. Unless you forced a soft material onto a	3	concept of connecting the propeller blade by
4	harder material and damaged the propeller or the	4	rotating less than a full revolution, right?
5	shaft, it wasn't a problem. I mean if they're	5	A. Yes.
б	both, prop and shaft, made of hard materials	6	Q. And then you would also agree that the
7	and there's plenty of UAVs that still utilize	7	revised amended claims include the other feature
8	this technique you can't put the wrong	8	of mistake proofing, right?
9	propeller on the wrong motor. It's not error	9	MR. PETERS: Object to form.
10	prone.	10	THE WITNESS: Can you just give me a moment?
11	BY MR. ABRAMIC:	11	Yeah. And mistake proofing is considered
12	Q. So you're saying the design in Sasaki	12	to be the wrong propeller on the wrong motor.
13	is not error prone at all?	13	So I would say yes.
14	A. I'm saying that it's not error prone	14	BY MR. ABRAMIC:
15	given the correct materials.	15	Q. Okay. So thinking about those two
16	Q. What are the correct materials Is it	16	particular features, I want to try to get a
17	error prone in the event that you have metal	17	sense of your understanding of the UAV market
18	threads on the driveshaft and plastic threads on	18	and the current state of the UAV market and
19	the propeller blade? Alfred Datharma July 13, 2020	19	which drones have those features. So are you
20	MR. PETERS: Objection. Calls for	20	familiar with the with current drones that
21	speculation.	21	are on the market?
22	THE WITNESS: Yeah. It really you'd	22	A. Yes.
23	really need to define the materials better.	23	Q. And so can you think of a DJI drone
24	There are some very hard plastics.	24	that has those two features: quick twist and
1	Dago 51		Daga 52
1	Page 51 BY MR. ABRAMIC:	1	Page 53 mistake proofing?
1		1 2	
	BY MR. ABRAMIC:		mistake proofing?
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2 3	BY MR. ABRAMIC: Q. Using any materials that you can come up with, is it your opinion that Sasaki was not	2 3	mistake proofing? MR. PETERS: Object to THE WITNESS: I'd have to
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# DJI v. Autel IPR2019-00846

		-	
1	Page 54 Q. Did you do any independent	1	Page 56 conventional threaded-type connection for the
2	investigation on your own to determine that?	2	propeller blade?
3	A. I think since the case started, I maybe	3	A. That's a good question. I'll say yes.
4	looked at propellers more closely because it was	4	MR. ABRAMIC: Okay. Steve, I have no further
5	on my mind. I did do some research after	5	questions.
6	watching Dr. Reinholtz's video where he puts the	6	MR. PETERS: All right. Can I take about 15
7	propeller incorrectly onto a DJI aircraft. And	7	minutes and be back on the record at about
8	I did do some research on that to determine that	8	10:50?
9	it was a problem that people were having where	9	MR. ABRAMIC: Sure.
10	they were damaging the threads of the propellers	10	MR. PETERS: Thank you.
11	by forcibly attaching them, as Dr. Reinholtz did	11	(Short break taken.)
12	in his video. And I think that's all I did.	12	Examination
13	Q. Sure. And when you say that you did	13	By Mr. Peters
14	some research after watching that video that	14	Q. Dr. Ducharme, do you recall Mr. Abramic
15	confirmed what Dr. Reinholtz demonstrated, what	15	asking you about a hypothetical where blades are
16	research was that? Was it like YouTube videos	16	attached to a driveshaft using magnets?
17	or something like that?	17	A. Yes.
18	A. I think I just did a general Google	18	Q. Do you recall answering that the magnet
19	search for, you know, problems, misthreading	19	hypothetical would not meet the engagement
20	propellers, maybe those search terms, something	20	limitation?
21	like that. I don't recall exactly. I don't	21	A. Yes.
22	believe I I didn't document it, but.	22	Q. Do you recall answering that the reason
23	Q. Did you attempt to misthread a	23	that the magnetic hypothetical would not meet
24	propeller blade that utilized a threaded	24	the engagement limitation was because the
	Page 55		Page 57
1	Page 55 connection to try to recreate what Dr. Reinholtz	1	Page 57 engagement limitation requires engagement of
2	connection to try to recreate what Dr. Reinholtz had done?	2	
2 3	connection to try to recreate what Dr. Reinholtz had done? A. No. Specifically in an attempt to		engagement limitation requires engagement of
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	Page 58		Page 60
1	recitation of lugs and notches in 11?	1	his questioning?
2	A. Yeah. I forgot about that part. Yes.	2	MR. PETERS: Objection. Privileged.
3	The it indicates that the shaft lock portion	3	Instruct the witness not to answer.
4	defining notches configured to engage	4	MR. ABRAMIC: I'm not asking for the
5	corresponding to lugs in the blade lock portion.	5	substance of any of the communications. I'm
6	Q. So would you like to expand on your	6	just asking if the subject matter of the
7	previous answer to the question of whether the	7	questioning was discussed.
8	engagement limitation requires engagement of	8	MR. PETERS: Same objection. Instruct the
9	lugs and notches?	9	witness not to answer.
10	A. Yeah. The engagement limitation,	10	BY MR. ABRAMIC:
11	Claim 1, 1G and 1H as it's shown on Exhibit 103	11	Q. What did you do to prepare for your
12	on Page 67, does not include locks and	12	deposition today, Dr. Ducharme?
13	notches I'm sorry lugs and notches.	13	A. I reviewed the exhibits that were used
14	Q. So when Mr. Abramic asked you about	14	in my declaration and declarations, and read
15	whether the magnetic hypothetical would not meet	15	through my declarations.
16	the engagement limitation because engagement	16	Q. And did you confer with counsel?
17	limitation requires engagement of lugs and	17	A. I talked to counsel. We had phone
18	notches, why did you answer yes to that	18	meetings, okay.
19	question?	19	Q. Okay. No more questions. Thank you,
20	A. I was incorrect at that moment. I was	20	Doctor.
21	thinking of just the word "engage" and thinking	21	(Witness excused.)
22	of mechanical parts fitting together and knowing	22	* * * * *
23	that the magnetic hypothetical, which wasn't	23	
24	well defined, would need something sticking out	24	
1	Page 59 and something that it would go into, like a lug	1	STATE OF ILLINOIS ) Page 61
2	and a notch. And so I was thinking it didn't		) SS.
3	meet the entire definition of Claim 1, but it	2	COUNTY OF COOK )
4	meets it does engage only with the	3	
5	clockwise only engages with the clockwise rotor	4	I, LAURA MUKAHIRN, Certified
6	and vice versa for counterclockwise. It does	-	
		5	Shorthand Reporter and Notary Public in and for
7	engage those because it fits together only with	6	the County of Cook, State of Illinois, do hereby
7 8		6 7	the County of Cook, State of Illinois, do hereby certify that on July 13, 2020, the deposition of
	engage those because it fits together only with	6 7 8	the County of Cook, State of Illinois, do hereby certify that on July 13, 2020, the deposition of the witness, ALFRED DUCHARME, called by the
8	engage those because it fits together only with those. I guess I should add: And, therefore,	6 7 8 9	the County of Cook, State of Illinois, do hereby certify that on July 13, 2020, the deposition of the witness, ALFRED DUCHARME, called by the Patent Owner, was taken before me, reported
8 9	engage those because it fits together only with those. I guess I should add: And, therefore, meets the engagement limitation.	6 7 8 9 10	the County of Cook, State of Illinois, do hereby certify that on July 13, 2020, the deposition of the witness, ALFRED DUCHARME, called by the Patent Owner, was taken before me, reported stenographically, and was thereafter reduced to
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# DJI v. Autel IPR2019-00846

Alfred	d Duo	charme
July	13,	2020

	Page 62
1	the within case, nor of kin or counsel to any of
2	the parties.
3	Witness my official signature in and for the County of Cook, State of Illinois, on
4 5	this 15th day of July A.D., 2020.
6	this isth day of July A.D., 2020.
7	
8	
9	
10	Zama Mukahim
	LAURA MUKAHIRN, CSR, RPR, CRR
11	CSR NO. 084-003592
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19	Alfred Ducharms July 13, 2020
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Autel Ex. 2012, p.17

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