

Exhibit 4

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW MEXICO

No. 10-CV-01077

STC.UNM

Plaintiff,

vs.

INTEL CORPORATION

Defendant,

Videotaped Deposition of STEPHEN D. HERSEE, Ph.D.

April 26, 2011

9:00 a.m.

201 Third Street N.W., Suite 1800
Albuquerque, New Mexico

PURSUANT TO THE APPLICABLE RULES OF CIVIL

PROCEDURE this deposition was:

TAKEN BY: BRIAN L. FERRALL
Attorney for Intel

Reported by: Marcia J. Schick, CM
Hughes Southwest Court Reporters
110 2nd Street S. W. Suite 505
Albuquerque, New Mexico 87102

1 (Exhibit No. 7 - STC's Responses to Intel.)

2 Q So, we have marked as Exhibit 7 a document
3 entitled STC's Responses to Intel's Corporation Second Set
4 of Interrogatories, Nos. 30 to 32. Have you ever seen
5 this document, Dr. Hersee?

6 A I haven't seen this document but I believe I
7 have seen an e-mail that contains this information.

8 Q These Interrogatories request information about
9 the equipment used in the development of the 998 patent
10 and some other patents; right? Did you provide any
11 information regarding that equipment?

12 A I was asked to verify if this equipment was
13 accurate and to the best of my knowledge, it is.

14 Q So, your role was verifying, not actually
15 identifying the equipment in the first place?

16 A Correct.

17 Q Does CHTM have the capability of manufacturing a
18 working integrated circuit?

19 A No.

20 Q What are the -- to the best of your knowledge,
21 what are the elements that are missing?

22 A Well, that is a big question. Okay. There is a
23 whole design aspect that we don't have. We do have some
24 advanced lithography capabilities to make small features.
25 We don't really have beyond that any metallization