

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4
5 GOOGLE LLC,

6 Petitioner

7 v.

8 WILDSEED MOBILE LLC,

9 Patent Owner

10
11 Case IPR2023-00247

12 U.S. Patent No. 10,869,169

13
14 Videoconference Deposition of HENRY H. HOUE, Ph.D.

15 Friday, August 18, 2023

16 12:06 p.m. Eastern Time Zone

17
18
19
20 Job No.: 503235

21 Pages: 1 - 195

22 Reported By: Dawn M. Hart, RPR/RMR/CRR

1 Pursuant to Notice, before Dawn M. Hart,
2 RPR/RMR/CRR and Notary Public.

3 A P P E A R A N C E S

4 ON BEHALF OF THE PETITIONER:

5 ZACK HIGGINS, ESQUIRE

6 DAVID L. ALBERTI, ESQUIRE

7 KRAMER ALBERTI LIM & TONKOVICH LLP

8 577 Airport Boulevard, Suite 250

9 Burlingame, California 94010

10 (650) 825-4300

11
12 STEVEN M. PAPPAS, ESQUIRE

13 STERNE, KESSLER, GOLDSTEIN

14 & FOX, P.L.L.C.

15 1101 K Street, Northwest

16 Washington, D.C. 20005

17 (202) 371-2600

1 A P P E A R A N C E S (Continued)

2 ON BEHALF OF THE PATENT OWNER:

3 CALMANN J. CLEMENTS, ESQUIRE

4 HAYNES AND BOONE LLP

5 2323 Victory Avenue, Suite 700

6 Dallas, Texas 75219

7 (214) 651-5000

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18 ALSO PRESENT: Sam Malek

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20 (All parties attending via Zoom.)

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C O N T E N T S

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By Mr. Higgins	5

E X H I B I T S

(Exhibits are attached to the transcript.)

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1 P R O C E E D I N G S

2 HENRY H. HOUH, Ph.D.

3 being first duly sworn or affirmed to
4 testify to the truth, the whole truth, and nothing
5 but the truth, was examined and testified as
6 follows:

7 EXAMINATION BY COUNSEL FOR PATENT OWNER
8 BY MR. HIGGINS:

9 Q Dr. Houh, can you please state your name
10 and address for the record?

11 A My name is Henry Houh, and that's
12 spelled H-O-U-H, and my address --

13 Q Perfect.

14 A And my address is 15 Ballard Terrace,
15 with a B, as in bravo, B-A-L-L-A-R-D, in
16 Lexington, Massachusetts.

17 Q Great.

18 Dr. Houh, I attended your deposition on
19 August 10th regarding three of the other Wildseed
20 patents, so I'll not ask you some of the same
21 questions that my colleague asked you on that, and
22 I understand that you have a hard stop today at 7

1 p.m. Eastern, so I'll do my best to get finished
2 before then, and I figure skipping some of those
3 questions will help with that.

4 So I believe you're familiar with the
5 ground rules for the deposition, but just to be
6 clear, I'll go over them again with you.

7 So you understand that you -- I'll be
8 asking questions and you'll be answering and your
9 answers will be recorded by the Court Reporter,
10 right?

11 A I do understand that, and I appreciate
12 the -- accommodating my schedule, if that's
13 possible, thank you.

14 Q Great.

15 And so you'll need to answer the
16 questions orally because the Court Reporter can't
17 transcribe nods or winks, et cetera.

18 You understand that, right?

19 A Yes.

20 Q Great.

21 If at any point you don't understand one
22 of my questions, please let me know that you don't

1 understand it and I'll do my best to rephrase it,
2 okay?

3 A Sure. I'll do my best, too.

4 Q If at any point you need to take a
5 break, please just let me know, that will be fine.
6 I just ask that if a question is pending you
7 answer the question first before you take that
8 break. Is that okay?

9 A Yes, that sounds good.

10 Q Great.

11 And then do you understand that you're
12 under oath and sworn to tell the truth just as if
13 you were in court in front of a judge?

14 A Yes.

15 Q Is there any reason you can think of why
16 you're not able to answer my questions fully and
17 truthfully today?

18 A No.

19 Q Dr. Houh, where are you located today?

20 A I am at my home, at the address listed
21 before.

22 Q And are you alone in the room right now?

1 A Yes.

2 Q Do you have -- are you using any kind of
3 messaging or any other way to communicate with
4 your attorney other than this Zoom session that
5 we're on right now?

6 A No.

7 Q And do you have any documents or papers
8 in front of you that you plan to refer to for
9 today's deposition?

10 A I do.

11 Q And what are those documents or papers?

12 A I have the '169 patent, I have my
13 Declaration, I have a Patent Owner Preliminary
14 Response, I have the institution's decision, I
15 have the Rothschild's reference, the Chen
16 reference, the Maes reference, and the Saltanov
17 reference.

18 Q Thank you.

19 And then if you are referring to one of
20 those hard copy documents in one of your answers,
21 if it's not the exhibit that I'm also referring to
22 in the Zoom call or on the record, could you

1 please let me know that you're referring to that
2 additional document?

3 A Sure, I will. I'll do my best there.

4 Q Okay. And with the hard copy documents
5 that are in front of you, are those the unmodified
6 originals, or do you have any notes or annotations
7 or flags on those?

8 A They are clean copies with no
9 annotations or flags.

10 Q Okay. Thank you.

11 What did you do to prepare for today's
12 deposition?

13 A I reviewed a number of documents, and I
14 met with an attorney.

15 Q And can you recall reviewing any
16 documents other than the documents that are in
17 front of you now?

18 A Yes.

19 Q And what documents were those?

20 A I also reviewed another reference that
21 was cited in the Preliminary Response. I think
22 it's the O'Neal reference.

1 Q Okay. And any other documents besides
2 that?

3 A In preparing for this -- well, I
4 reviewed excerpts from the file history of the
5 '169.

6 Q All right. And then anything else that
7 you can remember reviewing?

8 A I can't think of anything at the moment.
9 Anything else at the moment.

10 Q Okay.

11 (Exhibit 1 was marked for identification
12 and is attached to the transcript.)

13 Q So for today's deposition we served a
14 Notice corresponding to this case, the
15 IPR2023-247, for U.S. Patent No. 10,869,169.

16 And so I would like to introduce that
17 Deposition Notice as an exhibit, and I put it in
18 the Chat before, so I think you're able to access
19 that document, but could you please do so if you
20 haven't already.

21 A Yes, I have it open now.

22 Q And do you see on the second page it

1 says Declarant's Name and then Henry H. Houh,
2 Ph.D.? Is that your name?

3 A Yes, it is.

4 Q Terrific.

5 And then there is one asserted patent in
6 this matter, and are you fine if we refer to it by
7 the last three-digits? So that would be the '169?

8 A Yes, that sounds good.

9 Q Terrific.

10 Did you provide any opinions in this
11 case?

12 A I did, yes.

13 Q And are all of those opinions set forth
14 in your Declaration?

15 A At this point all my written opinions
16 are in my Declaration I submitted in this case.

17 Q Now, you said just now that all your
18 written opinions are in there. Do you have other
19 opinions that are not written?

20 A I mean I thought -- you know, I reviewed
21 the Patent Owner Preliminary Response, but if I'm
22 asked to provide a supplemental report, I think I

1 may write down some other opinions at a later
2 date.

3 Q So potentially you could have -- or
4 maybe I'll just ask, do you have any other
5 opinions that you've provided?

6 A I don't have any other written opinions
7 that I provided in this case at this point.

8 Q Okay. And in terms of unwritten
9 opinions, have you provided any additional
10 unwritten opinions?

11 A I mean I had conversations with
12 attorneys, but I don't -- I don't know if I'll be
13 asked to write a Supplemental Declaration in which
14 I could write down further opinions.

15 Q Okay. Are the bases for all your
16 opinions in your Declaration?

17 A I tried to put them in there, yes, so I
18 hope so. That was my expectation when I submitted
19 the Declaration, that I would provide the basis.

20 Q And in terms of the unwritten opinions
21 that you have so far, what are those opinions?

22 A I mean -- in terms of unwritten

1 opinions? I mean I haven't -- I haven't -- they
2 may be -- you know, I've thought about the
3 Preliminary Response, and I expect to -- you know,
4 if you asked me questions about some of that,
5 maybe -- I mean I don't have any further written
6 opinions, and the opinions I have I'm not sure are
7 at the point where I would actually be committing
8 them to paper and submitting them yet.

9 Q Okay. And those opinions that you might
10 not submit to paper yet, what are those opinions?

11 MR. CLEMENTS: Objection. Scope.

12 A I mean I think they'd be opinions as to
13 why I disagree with some of the statements that
14 the Patent Owner made in the Preliminary Response.

15 Q Okay. And can you give me an example of
16 one of the reasons why you might disagree with
17 something that was stated in the Response?

18 MR. CLEMENTS: Objection. Scope.

19 A So I mean do you -- can I -- do you want
20 to provide that as an exhibit? Is it okay if I
21 can take a look through it?

22 Q Okay. So in order to tell me any of the

1 opinions that you -- your unwritten opinions that
2 you may have, you would need to refer to the
3 Response?

4 A Well, as I said, they're with respect to
5 the Response, so I want to be sure I'm looking at,
6 you know, what the Patent Owner has laid out.

7 But I understand today is really about
8 my initial Declaration, not -- and I submit a
9 Supplemental Declaration or a Response -- I don't
10 know what they call them, you know, after -- at a
11 later date, and I understand you'd have the chance
12 to depose me on those written opinions.

13 So I mean I'm not -- I came prepared --
14 I came today prepared to talk about my opinions,
15 my written opinions that are already existing.

16 Q Okay. So sitting here today, without
17 looking or reviewing the entire Response, can you
18 specify any other opinions that you have
19 formulated?

20 MR. CLEMENTS: Objection. Scope.

21 A I mean, as I said, some of what I've
22 been thinking may -- at some point I may be asked

1 to commit them on paper and -- which they'll be
2 my -- you know, potentially in another Declaration
3 in this case. So at that point, you'll -- I think
4 that's the appropriate time to respond to points.

5 But I understand today -- you know, I do
6 have opinions, but I'm -- with respect to the
7 written -- you know, my written opinions have been
8 provided in this Declaration at this point.

9 So, you know, if and when there are
10 further written opinions I provide, I understand
11 you can depose me on those, but I haven't had the
12 time to commit all those to paper and fully
13 provide bases for all of what I'm thinking at this
14 point.

15 As I said, they're kind of preliminary
16 thoughts that I may be -- I may put on paper and
17 submit as a Declaration later.

18 Q And I understand that you haven't
19 committed them to paper yet and that you might
20 submit them formally later, but can you give me an
21 example of any such thought or opinion?

22 MR. CLEMENTS: Objection. Scope.

1 A Well, I reviewed several of the points
2 that the Patent Owner raised in the Preliminary
3 Response, and I generally disagree with some of
4 the statements they made. And their overall
5 conclusion.

6 Q And can you give me an example of one?

7 MR. CLEMENTS: Objection. Scope.

8 A Well, I think I can give you an example
9 from memory. I mean, I haven't memorized every
10 word, but let's see.

11 There was some sort of determining
12 argument that the Patent Owner argued, and I
13 disagreed with their argument there. It was
14 directed at kind of narrowing the scope of the
15 work -- well, of the -- some of the claim terms.

16 There's some argument the Patent Owner
17 raised about claim 18 with respect to some sort of
18 circular reasoning, which I disagreed that it was
19 circular, or that it was improper or incorrect
20 with respect to what I said had already previously
21 said.

22 I think there was another one. I -- I

1 recall kind of three main sections. I can't
2 remember -- from memory remember the second one at
3 the moment.

4 Q Okay. And with the determining notion,
5 can you explain more about your thoughts there?

6 A I mean my thoughts there are that the
7 opinions I laid out in the original Declaration I
8 submitted were correct.

9 And furthermore, it appears the PTAB
10 kind of agreed, at least preliminarily, with --
11 and accepted the arguments to rule that at this
12 point they should institute this -- institute the
13 IPR.

14 For -- I forget -- I'm not a lawyer, so
15 I don't remember -- have a trial, I guess, or
16 institute a trial. I forget what the legalism is.

17 Q So on the determining you mentioned a
18 couple of things that I wanted to focus on here,
19 that first your opinion is that your initial
20 Declaration is correct.

21 So is it the case, then, that your
22 opinion regarding this determining notion are that

1 your written opinions in your report are the
2 correct opinions? Is that a fair statement?

3 A Yes, I stand by all my opinions. I
4 haven't seen any reason to change my mind on any.
5 On anything that --

6 Q And then are there any opinions in
7 addition to the ones that are written in your
8 initial Declaration that you now have regarding
9 the determining concept?

10 A Well, I mean, as I just said, I think
11 the Patent Owner's incorrect in their -- in
12 their -- the reasoning with respect to their
13 discussion of that in the Preliminary Response,
14 and as you know, I mean I didn't -- I couldn't
15 have been looking at that when I submitted my
16 Declaration.

17 And so I stand by all the opinions in my
18 original Declaration, and I have reviewed the
19 Preliminary Response, and I do disagree with many
20 of the arguments the Patent Owner made.

21 Q Okay. In the terms of the claim 18 and
22 the circular reasoning concept, can you explain

1 why you think there's not circular reasoning in
2 claim 18? I mean, can you explain why you think
3 that the Patent Owner's discussion about circular
4 reasoning is incorrect?

5 MR. CLEMENTS: Objection. Scope.

6 A I can tell you what I said in my
7 original Declaration if you want me to explain it
8 further to you.

9 Q Well, no, because your original
10 Declaration wouldn't explain why the response and
11 the response's statement about circular reasoning
12 is incorrect.

13 I was asking you about something you had
14 mentioned, that in claim 18 the Patent Owner's
15 response referring to circular reasoning is
16 incorrect, and I'm asking you why do you believe
17 that the statement about circular reasoning is
18 incorrect?

19 A Because I believe I was correct to start
20 with in my original Declaration. So I'm going to
21 take a look at my Declaration now, and I'll
22 explain to you what I'm saying in my Declaration.

1 Q It's fine for you to do that, Dr. Houh.
2 I just wanted to let you know that I put your
3 Declaration in the Chat as well, so ...

4 A Well, thank you.

5 Q We can introduce that as an exhibit now,
6 but it's fine if you wanted to look at the paper
7 instead. I just thought I might as well put it in
8 the Chat now as well.

9 A Will that be Exhibit 2 to this
10 deposition, then?

11 Q Yes.

12 (Exhibit 2 was marked for identification
13 and is attached to the transcript.)

14 A So I am currently looking at my claim 18
15 to be the assignment element, and I do have some
16 discussion that refer back to my discussion in
17 claim 6.

18 But what I'm saying here is, for
19 example, there is -- I think it was -- so it is
20 well known at the time that in web pages, which
21 with Rothschild -- which Rothschild discusses, and
22 that the kind of rich kind of email, which a

1 POSITA would have understood, really the only
2 standard for that markup -- and as far as I know,
3 the only implementation that I've seen that I'm
4 aware of at the time of the invention -- was using
5 HTML to mark up rich content for email.

6 So in paragraph 139 of my Declaration I
7 talk about HTML code, which is an anchor which
8 causes a link -- a linking effect, and that the
9 anchor has a property called href, which tells you
10 if a user clicks a hotlink or a hyperlink on a web
11 page or a rich email, what action to take and what
12 page or more specifics about location information.

13 So, for example, opening a web browser
14 to do something, so you use, you know, http:, and
15 I think they call that the scheme, and there'd be
16 a full URL.

17 In this case, I just -- on page 77 of my
18 Declaration, I'm just using all caps URL, but that
19 would be something that includes the scheme and
20 includes a path and a host name.

21 So it might be http://, you know, www.,
22 you know, productcompany.com/, you know, product

1 1.html, which would link to that page that gives
2 you information -- presumably gives you
3 information about product 1 of that company.

4 And then clicking on that link, whatever
5 the link would be, would cause a web browser to
6 open that navigated you to that page.

7 And the contents within that
8 tag -- so if the anchor tag starts out with a
9 less than A and ends with the greater than sign,
10 or angle brackets, and then there's a third line
11 of the HTML is a less than/A greater than or --
12 and that's the close of the anchor tag.

13 And what's within it could be an image.
14 And in this example, it's an image that is
15 graphic.jpg, and what's within it could be text,
16 it could be text and an image.

17 And a person of ordinary skill would
18 have known how to do all this because, you know,
19 Rothschild is talking about web pages, web
20 servers, and that's the context of Rothschild.

21 And so what happens when this fragment
22 of the HTML, or hypertext markup language, is

1 rendered in a browser or an email reader that can
2 support rich email, there's often some kind of
3 indication, like a different color with
4 underlining, that indicates that that text or
5 image, or both, is a hyperlink or hotlink, and
6 that the user can click on that and perform some
7 action.

8 So what I'm saying here is that this --
9 a POSITA would have understood that data contained
10 within the email message that associates the
11 interactive advertisement with the graphic or icon
12 that is to be entered -- rendered, sorry -- on the
13 receiving device's display, because it's
14 assignment information, because it assigns the
15 graphic or icon to the interactive advertisement.

16 So whatever image is there, the
17 reference assigned to that image would be whatever
18 is H reference is.

19 And so that's one example of associating
20 or assignment information. So that's the
21 assignment -- that's an example of the assignment
22 information to assign the hotlink to a graphical

1 control element.

2 Q Okay. So I think I understood.

3 So then the hotlink in that example is
4 the URL, and the icon is the graphic image, and so
5 you assign the URL or hotlink to the icon?

6 MR. CLEMENTS: Objection. Form.

7 A I'm not sure I fully agree with the
8 premise in all that. What were you saying is the
9 hotlink?

10 Q So is that -- when you have the
11 href, that's a reference to a URL; is that right?

12 A It would be within the href. So the
13 value of the href property would be the link that
14 this whole anchor tag would be linked to if the
15 user performs an action to select the link. So
16 that would cause an action to occur to open that
17 page. That's identified by the href property of
18 the anchor tag.

19 Q So the href property of the anchor tab
20 [sic] has a value, that value is a URL, and you're
21 saying that that value is the -- is a hotlink?

22 A No, I think you're misunderstanding.

1 I think -- the whole thing causes a
2 hyperlink to be created. So it's not just a
3 value. That value is simply a URL. It doesn't
4 mean anything until you code it into an anchor.
5 When I say "anchor," I mean . That's what
6 stands for. It doesn't mean a hyperlink unless --
7 until you code it into an anchoring tag.

8 Now, you could use a URL to refer to
9 like a JavaScript file or a cascading style sheets
10 file, which were both available at the time. That
11 doesn't make those hyperlinks, because you're
12 simply asking to load or refer to those URLs. So
13 any use of a URL isn't necessarily a hyperlink or
14 hotlink.

15 Q Okay. But in the example you gave,
16 though, if you have a -- outside of JavaScript, so
17 let's just keep it as a simple HTML, and you have
18 your href, the anchor and the href tag in
19 there, in that situation, the href tag is the
20 hyperlink or hotlink; is that right?

21 A So it's -- the whole anchor tag is --
22 will be rendered as a clickable element that a

1 user could select. So I mean that may be part of
2 the definition of an anchor element, an HTML. But
3 I wouldn't equate it one to one as you're doing.

4 Q Oh, okay. Yeah, I'm not trying to
5 mischaracterize what you're saying. So I'm just
6 trying to be clear on what you're saying.

7 So if you don't equate it one to one
8 or -- yeah, I don't need to put words in your
9 mouth.

10 What would be the right way to equate
11 it, then, if you're talking about the anchor
12 href example that you're just talking about, with
13 a value inside the href, and I think -- you know,
14 there's a URL inside the href, so what exactly
15 in that situation is the hyperlink or hotlink?

16 MR. CLEMENTS: Objection. Form.

17 A Well, when rendered, the whole thing --
18 the anchor tag itself is the whole -- causes a
19 browser -- HTML browser, or any application with
20 an HTML rendering engine embedded in it, to render
21 the anchor tag as a -- first -- the contents of
22 the tag -- in this case, it's just an image. It

1 could be image and text, it could just be text.

2 And, you know, this is very common. If
3 you surf around the web, you see highlighted text
4 that -- you know, versus just non-highlighted
5 black, no underline, it seems clear to the user
6 there, you can click on some of these elements on
7 a web page and it will take you to another web
8 page within the same window, or sometimes they
9 open up new windows, and that's -- that can be --
10 there can be properties in the anchor to specify
11 which, or there might be default properties
12 assumed by the browser.

13 So what happens in that is, if there's
14 an image within the -- that anchor -- that are
15 inside the anchor tag that are -- that is -- you
16 know, there's a start tag, which is -- starts, you
17 know, and then up to the closed angle bracket,
18 or less than to greater than. And then there's a
19 closeup tag, which is , or angle bracket.

20 If I say "angle bracket," I hope you
21 understand one is a closed and one is an open,
22 that it's hard to -- so -- so whatever is between

1 the open tag and the close tag would be content
2 that the renderer will use to render the -- this
3 code as a clickable element on a browser page.

4 And so if it's an image, it will render
5 the image there. And then, you know, if you click
6 on that image, it could either, you know, just
7 open a new window with the -- to the href that's
8 specified in the href property, or it could open a
9 new window, just depending on what the application
10 defaults are, and you can actually kind of specify
11 this in the anchor tag sometimes as well.

12 So in that case, that image is -- it's a
13 graphical element that when the user clicks it,
14 the -- a new browser or the current window could
15 navigate to the site specified by the href
16 property.

17 So that's an example of what happens
18 when this code is used to present it in a page
19 that renders the code as HTML.

20 Q So in that example that you just gave,
21 when a user clicks on something and something else
22 opens as a result, is the thing that the user

1 clicked on, is that the hyperlink or hotlink?

2 A Well, that's the element that the user
3 can click on to activate the hyperlink or hotlink.

4 Q Okay.

5 A And it could be text as well. Like it
6 could be image and text, or it could just be
7 image.

8 There's also a property of an image
9 that's called alt, which provides text that can be
10 displayed in place of the image for browsers that
11 don't support it or in case the image does not
12 load correctly.

13 So there can be many ways to have text
14 as part of the link, the hyperlink. You know.

15 Q Okay. So I think I understand, then.

16 So in the case that you were just
17 talking about, where a user clicks on something
18 and say some new address is -- the browser goes to
19 some new address, that new address is specified by
20 the value in the href tag, and so the
21 hyperlink or hotlink is something that's inside
22 the item that the user clicked on.

1 Is that -- am I getting it right now?

2 A What was the last part?

3 MR. CLEMENTS: Objection to form.

4 Q So the URL or hyperlink -- or, sorry,
5 the hyperlink or hotlink is something that's
6 inside of the item that the user clicked on?

7 A I guess you're mixing -- the question is
8 a little confusing -- well, doesn't make sense,
9 because you're mixing apples and oranges.

10 Something's in something else. Like
11 something is in the thing that you click on, but
12 it's not literally in. So I'm not really sure how
13 to answer that question.

14 The image that's displayed is whatever
15 image specified, but that doesn't mean the link is
16 in that image. If you click on the image, you
17 know, you could navigate to that link that's been
18 specified to be the href -- in the href property,
19 where -- of the -- of this code, of this HTML
20 code.

21 Q Yeah, I think I see where I got it wrong
22 before, thank you.

1 All right. So then just maybe to make
2 it simpler for me, so then when you're talking
3 about the hyperlink or hotlink and the
4 relationship to what the user clicks on, I'm
5 trying to get -- I'm trying to get to some like
6 simple way of explaining what exactly is the
7 hyperlink or hotlink in the situation you're
8 describing.

9 Is it that the hotlink or hyperlink is
10 the address that is -- that will -- that the user
11 will go to after clicking on the element or is it
12 something else?

13 MR. CLEMENTS: Objection. Form.

14 A Well, so the address that would be
15 navigated to in case the anchor is activated or
16 selected by the user is the href property of the
17 anchor tag. So that's href equals, and then in
18 quotes, the URL.

19 Now, in this particular example, what's
20 within the anchor tag is an image and just an
21 image. So what happens is that the browser
22 renders an image on the display page either in a

1 web page or, for example, a rich email reader that
2 supports rich email, and there will be -- the
3 image actually rendered or shown on the page with
4 some indication. In an image, sometimes the
5 border color may be different, or that it has a
6 border.

7 So in some browsers, certainly around
8 the time of the invention, you could see I mean a
9 blue or purple line around the image that would
10 indicate that that image is clickable. And the
11 user click it and see what happens.

12 And so -- so this code -- the code
13 actually is an example of something that
14 associates the image itself, with the href
15 creating this link, this hyperlink.

16 If you use the image outside of this --
17 you know, you could use it again outside of this
18 anchor tag. It would still render the image, but
19 it wouldn't be a hotlink.

20 So you could just say image source
21 equals graphic.jpg, and that code alone, not
22 inside an anchor, would just show an image on the

1 page, and you see that on web pages all the time.

2 Some of the images are clickable to
3 perform an action to navigate to somewhere else,
4 some are not. And so you could just insert
5 `image.image source equals graphic.jpg` to render an
6 image.

7 But what creates a navigable link in a
8 web browser is the creation of the whole anchor
9 tag, which is the `<a>`, and within the anchor tag
10 you have whatever item, whether it be graphics,
11 text or both, that a user could click on to
12 navigate to the href specified by the anchor tag
13 property href.

14 Q So I think I understand.

15 So in the case -- let's just take the
16 case that you've been focusing on, the example of
17 an icon that has both the image source tag and the
18 href tag in it, so that image, then -- I want
19 to get the nomenclature right.

20 So what's the relationship between that
21 type of image and the hotlink or hyperlink?

22 MR. CLEMENTS: Objection. Form.

1 A So -- I mean what I'm saying here is
2 this is an example of the -- you know, of element
3 18 -- part of element 18.1, and the relationship
4 is that -- of the image is that when you place it
5 inside an anchor tag when the browser renders the
6 code here, the HTML code, it shows the image, and
7 then it further indicates that it's clickable --
8 the default settings to -- it clear things that
9 are clickable so you know what you can click on,
10 but when you click it, after this anchor tag has
11 been rendered, the browser will navigate to the
12 page specified by the href property of the anchor
13 tag that you click on.

14 Q Okay. So then in terms of the -- and
15 I'm trying to get to the relationship between the
16 hyperlink or hotlink and the image, because when I
17 said earlier -- when I asked you if the hyperlink
18 or hotlink is in the image, you were pointing out
19 that that's not quite technically the right way to
20 say it, but it does seem that when you -- when the
21 user clicks on that image in that example, the
22 user is going to a URL specified in the href

1 tag.

2 So I'm still a little confused on -- so
3 what -- in that situation that you're describing
4 with just the example of the image with the
5 href tag as well, what is the hotlink in that
6 situation?

7 A Well, the hotlink -- the specific
8 hotlink would be the anchor tag and the specific
9 href, and then it can be -- what -- what would
10 cause the -- if you had nothing within the anchor
11 tag, you might not see anything. I'm sure I've
12 done this before. You might not see anything, you
13 might see a little blip.

14 It wouldn't -- it would still be a
15 hotlink, or it would still be in an anchor tag,
16 and it would still -- if you could -- if the
17 browser would allow you to click on something
18 represented by nothing in the anchor tag, it would
19 still navigate.

20 But in that case, you know -- say you
21 just had the word "click me" or, you know -- so in
22 that case, the text "click me" appears as a

1 hyperlink, and when you clicked on "click me," the
2 specific action that's performed is specified by
3 that instance of the code of that anchor tag that
4 you clicked on will take you to the href specified
5 in the anchor tag.

6 So what associates the text like "click
7 me" with the hyperlink is the fact that it's
8 inside the anchor tag. If you didn't have it
9 inside the anchor tag -- if it said "click me"
10 without an anchor tag around it, you know, the
11 user might try to click it, but it's not an
12 anchor, so nothing's going to happen, even though
13 it says "click me," right? You can have whatever
14 text you want within the anchor tag, you can have
15 whatever image you want inside the anchor tag.

16 So that particular text or graphic being
17 part of that anchor tag is done by putting it
18 inside the A -- the open A and the closed A text
19 of an anchor tag.

20 And so that's what -- that's -- that's
21 what takes any specific graphic or text and turns
22 it into a hyperlink as rendered properly in a

1 browser.

2 Q Okay. All right. Thank you, Doctor. I
3 think I understand your point now.

4 Okay. So let me turn back to some more
5 of your background and just your engagement in
6 this matter. And as I mentioned, I attended your
7 deposition last week, so I'll make this shorter
8 than the earlier one.

9 You've been retained as an expert
10 witness in this matter, correct?

11 A Yes.

12 Q And is your retention agreement with the
13 law firm of Haynes and Boone?

14 A That's yes.

15 Q And then, I believe you said earlier, so
16 if I get it wrong, of course you can just correct
17 me, but I'm going to try and speed this along, so
18 did you first become involved in this case in the
19 fall of the 2022, or approximately at that point?

20 A Yeah, I'm going to look at my
21 Declaration as to when this was submitted.

22 So I mean that sounds approximately

1 right. This was submitted at the end of November.

2 Q And did someone at Haynes and Boone
3 contact you to bring you into this case?

4 A Yes, I think that's what happened.

5 Q Okay. And you've worked with Haynes and
6 Boone about 15 or 20 -- on 15 or 20 different
7 cases before these Wildseed cases; is that right?

8 A That sounds approximately correct.

9 Q Yeah, I'll skip the part about your CV
10 that you went through before.

11 What percentage of your annual income,
12 sir, comes from serving as an expert witness?

13 MR. CLEMENTS: Objection. Scope.

14 A Well, this year, because I sold another
15 business I had last year, it's now -- all of my
16 income comes from my expert consulting work. But
17 last year it was probably about half to two-thirds
18 of the revenue generated by my businesses.

19 Q Let's see. And I believe we've already
20 formally introduced that as an exhibit, but your
21 Declaration from this matter I put into the Chat
22 room, and you were referring to it already, but I

1 wanted to turn you to that document.

2 So this -- and I believe this has
3 already been marked as Exhibit 2, but this
4 document that I put in the Chat most recently is
5 your Declaration for this 247 matter for the '169
6 patent; is that right?

7 A Yes.

8 Q What was your role in creating this
9 Declaration?

10 A I mean, generally speaking, I had
11 discussions with counsel. I think I provided some
12 first, you know, drafts of part of it. Counsel
13 may have provided -- filled in other sections
14 like, for example, the legal background section.
15 You know, I'm not a lawyer.

16 And then there was some back-and-forth
17 with edits and changes. As you know, it can be a
18 collaborative effort, but in the end, even though
19 I didn't type every single word, these are my
20 opinions and I stand by them.

21 Q And can you approximate like how many --
22 putting aside the legal background and let's focus

1 on the portion about where you went through the
2 prior art references and stated that some of the
3 references taught you certain things or rendered
4 obvious certain things, can you approximate what
5 percentage of those substantive arguments about
6 the references where you were the initial person
7 who came up with the arguments for those
8 references?

9 A You want me to go through kind of claim
10 element and argument by argument through my report
11 and try --

12 Q Not at this point. I was looking for a
13 high-level answer. If you said, oh, probably
14 about half of them, or if you happen to know, or
15 if you can approximate.

16 A Well, I mean it's hard to know when
17 you're having a discussion, you know, how to map
18 that to percentage of what you're asking. I'm not
19 sure I really know how to do this, especially
20 since this is one of five different patents I
21 worked on contemporaneously.

22 Q Okay. Is it fair to say that you did

1 not come up with all of the arguments in the
2 section regarding what the prior art references
3 taught?

4 A I mean I know that in a discussion,
5 generally speaking, I didn't agree with an
6 argument, I wouldn't, you know, want to say
7 anything about an argument I didn't agree with.

8 So sorry, could you say your question
9 again, please.

10 Q Oh, sure. Yeah. And I'm not asking
11 whether you -- because you said that you stand by
12 the opinions, so I'll take it that you do agree
13 with your Declaration. I'm not asking about that.

14 I'm saying, is it fair to say that for
15 at least some of the substantive arguments about
16 the prior art references, you did not come up with
17 the substance of those arguments?

18 A I mean, again, I don't remember exactly
19 how everything went, but I mean it's possible that
20 may have been case, but in the end, you know, even
21 if I didn't, I review all these opinions -- you
22 know, I review my whole Declaration carefully and

1 I do stand by my opinions.

2 Q Okay. And who chose the prior art
3 references that appear in your Declaration?

4 A I mean if you mean only the patents
5 which are used to challenge the obviousness or the
6 patentability of the '169 patent, I think those
7 were provided to me by counsel. But I did, I
8 think, I provide other supporting references that
9 I cited to in my Declaration.

10 Q So let me just -- I think if you -- we
11 can go to -- let's see. I'm just looking for
12 which page to point to you in your Declaration, so
13 just a moment.

14 So for all the references, Rothschild
15 and the other references that were listed in the
16 grounds for asserting that the patents are -- that
17 the patent is invalid, all of those references
18 were provided by counsel, correct?

19 A No. I think -- I think we're not
20 challenging the invalidity or validity of the
21 patents in this matter; I think we're challenging
22 the patentability of the patent.

1 Q Sure. Yeah, that's fair.

2 So for those grounds, all of those
3 references were provided by counsel, correct?

4 A I believe that's correct, from what I
5 can recall right now.

6 Q If you could turn to page 27 of your
7 Declaration, and paragraph 43, I'd like to ask you
8 about that.

9 A Okay.

10 Q So you refer to the hotlink and the
11 interactive advertisement, and so I am trying to
12 understand what is the relationship between the
13 hotlink and the interactive advertisement.

14 And I should -- I can point you also,
15 Dr. Houh, to the next page. You have a graphic,
16 also part of your paragraph 43. So if that helps,
17 you can refer to that as well, or anything else
18 you like.

19 A I'm going to refer to the patent itself
20 as well. Is there an electronic copy or ...

21 Q Yeah, you know, that's an excellent
22 suggestion. Let me make that an exhibit just so

1 that we're clear we're talking about the same
2 thing. One moment and I'll put that in the Chat.

3 Okay, Doctor, I've put the copy of the
4 patent that was also submitted in the IPR in the
5 Chat just now. So we can mark that as Exhibit 3.

6 (Exhibit 3 was marked for identification
7 and is attached to the transcript.)

8 A Thank you, I have it now.

9 So to answer your question, the
10 interactive advertisement is analogous to the
11 hotlink that's claimed. For example, it's
12 under -- it's an example of what a person of
13 ordinary skill at the time of the invention in the
14 context of the spec and the prosecution history
15 would have understood was within the scope of
16 hotlink.

17 Q And then you mention in your paragraph
18 43 that you can interact with this ad, and then
19 that interaction causes the recipient's device to
20 retrieve additional data from a website.

21 And I'm not trying to trip you up or try
22 to make you say something about the term "hotlink"

1 as, of course, the term "hotlink" is in the claim,
2 but maybe if we just talked about hyperlink, if
3 that's okay.

4 What is the relationship between the
5 interactive advertisement and a hyperlink?

6 MR. CLEMENTS: Objection. Scope.

7 A Well, in this particular case, in
8 Rothschild, this interactive advertisement is an
9 example of a broader class of what a person of
10 ordinary skill in the art would have understood --
11 was it hotlink? Was that the word you used at the
12 end of your question?

13 Q Uh-humh.

14 A -- to be.

15 So this is an example of what would have
16 been understood to be a hotlink as claimed.

17 Q And now I'd like to ask a slightly
18 different question, Dr. Houh, which is, if we --
19 let's just take the term "hotlink" out of the
20 question, just so that it's not me telling you
21 about claim language, I'm just going to use the
22 more generic term "hyperlink" for this next

1 question.

2 And what is the relationship between the
3 interactive advertisement of Rothschild and a
4 hyperlink?

5 MR. CLEMENTS: Objection. Scope.

6 A Well, so generally, I mean the
7 interactive advertisements that are inserted when
8 the user uses the interface of Rothschild, to pick
9 one, is a -- is an instance of a hyperlink.

10 So that further -- that is further
11 specified, you know, there's -- that a person of
12 ordinary skill would have understood, you know,
13 based on reviewing Rothschild, that that's what
14 the interactive advertisement is -- would have
15 been an example of.

16 Q Okay. And what is the relationship
17 between the interactive advertisement and a
18 hyperlink -- I'm mean, sorry, not hyperlink, which
19 I just asked, the interactive advertisement and a
20 URL?

21 A Oh, could you -- I have a copy of
22 Rothschild I could refer to, but if you have an

1 electronic copy, that would be helpful as well.

2 Q Oh, yes. Once again, that's -- I should
3 have done that already probably. Let me make that
4 an exhibit so that it's clear we're talking about
5 the same thing. Thank you, Doctor.

6 (Exhibit 4 was marked for identification
7 and is attached to the transcript.)

8 Q Okay, uploaded it to the Chat.

9 A Thank you, I have it open now.

10 So, for example, if you look at the
11 Exhibit 4 Rothschild reference at column 5, it
12 talks about the interactive advertisement and the
13 URL relationship, which is at line 8. It says:

14 When a recipient interacts with an
15 interactive advertisement, the request data
16 (contained in the advertisement's embedded URL)
17 calls to the data processing layer. The data
18 processing layer uses the request data (which may
19 contain message data that is linked to sender data
20 and advertisement data) to retrieve data from the
21 Web site memory device.

22 So that's describing that

1 the interactive advertisement has an embedded URL,
2 and one way of doing that is by example of the
3 HTML code we were looking at earlier.

4 So I think that answers your question.

5 Q I think, Dr. Houh -- let me point you to
6 a different paragraph in your Declaration as well.
7 So going back to your Declaration on page 49,
8 paragraph 84, you talk also about the URL and
9 hotlink, so I wanted to point you to that.

10 A Okay, I'm there.

11 Q Okay, great.

12 So, of course, feel free to read the
13 paragraph yourself, but what I'm focused on is
14 where there's a -- the last sentence on page 49
15 you talk about "would have understood that the
16 texter graphic that the user interacts with to
17 activate the URL is a user interface element for
18 activation of the hotlink."

19 And so I understand -- or I think I
20 understand -- what you were explaining earlier in
21 your testimony, but this phrase here, where you
22 have a parallel language between activating the

1 URL and activation of the hotlink makes me wonder,
2 well, is activating the URL activating the
3 hotlink, or is that not quite right?

4 In other words, if -- or maybe it is
5 fine, I just was a little bit unclear, because you
6 have the concept of a graphic that you interact
7 with, the URL that's contained in the href, let's
8 say, for -- not in Rothschild, but let's say, for
9 example, in href tag or any other type of
10 thing, there's some URL that's specified in
11 association with the graphic that the user
12 interacts with, and then you're saying that the
13 graphic that the user interacts with to activate
14 the URL is the user interface element for
15 activation of the hotlink.

16 So that makes me wonder, well, what is
17 the relationship between the URL and the hotlink.

18 A Well, so, you know, the URL -- the
19 hotlink includes an embedded URL. When I say
20 "activate the URL," I really mean -- I mean that's
21 what I was describing earlier, when the user
22 clicks on a hyperlink in a browser that can render

1 the associated code, then it can -- it opens up a
2 page specified by that -- by that hyperlink.

3 Now, there are other types of URLs with
4 different schemes that are part of the URL that
5 can open like a mail program and pre-populate like
6 a subject and message text.

7 So, for example, if you use -- instead
8 of the scheme http, you use the scheme mail tube,
9 it will open up the associated default mail reader
10 that's configured to send a message. And if it
11 can have the interface to pre-populate the
12 message, it can do that based on information in
13 the URL.

14 But assume we're talking about an http
15 link now, and so whatever that link is, there
16 would be, either within the same browser or a new
17 browser, so if you're using, for example, mail
18 reader to read rich email, if you click on a link
19 in the rich email, it may open up a web browser, a
20 separate web browser, to show. So, you know,
21 certainly as I explained, the hotlink includes an
22 embedded URL.

1 And when I say "activate the URL" here,
2 what I'm talking about is that when the user
3 clicks on a text or graphic that is the
4 representation of the -- the rendered
5 representation that indicates that it's clickable,
6 then when I say "activate the URL," what I mean is
7 that that URL that's part of that code that causes
8 that hot -- that hyperlink to be rendered is used
9 to retrieve further data from the website, either
10 through an existing window if it's set up -- if
11 it's a browser and it's set up that way, or
12 through a new browser window.

13 Q Okay. So the -- let's see. For
14 activation of the hotlink.

15 All right. So the way I read -- my
16 impression, at least, from this last sentence
17 of -- on page 49 of your Declaration is that
18 activating a URL is essentially the same thing as
19 activating a hotlink; is that correct? Or am I
20 misunderstanding something?

21 A I mean I'm talking about the whole -- I
22 mean, I'm -- you know, when the URL has been

1 selected, I mean that's -- that's what I'm -- one
2 of things I'm mapping the Rothschild reference to.

3 When the user clicks on the
4 advertisement -- the interactive advertisement or
5 when the message is generated so that the user can
6 later click on the interactive advertisement, but
7 that -- that element of the interactive
8 advertisement has -- as I discussed earlier, it
9 has -- includes an embedded URL.

10 And, you know, in Rothschild it says
11 that's a -- it could be an image or a graphic text
12 that's consistent with the HTML specification.

13 And what I'm saying is that a person of
14 ordinary skill would have understood that the text
15 or graphic that the user interacts with to
16 activate the URL is a user interface element for
17 activation of the hotlink.

18 So activating the URL through the
19 interaction of the rendered text or image that the
20 user can see is clickable, and even if they can't
21 see it, they can still -- still be able to click
22 it and it would cause the same action. It's just

1 a convenience to highlight that clickable item.

2 That's -- that's what I'm saying is one
3 of the things that -- why Rothschild is teaching
4 this claim element 6.1, as part of my support for
5 that.

6 Q Well, there's -- so what I'm getting at
7 is there's two -- let me focus you on two concepts
8 here -- or there's a parallel.

9 So you have a graphic that the user can
10 interact with, and that graphic -- interacting
11 with that graphic activates the URL, and then you
12 have a user interface element, and let's say that
13 that, for example, is a graphic and that's your
14 activation of the hotlink.

15 When I read this, it makes me think,
16 well, then the hotlink is the URL, or equivalent
17 to URL, although I'm not sure whether you're
18 saying that the graphic is the hotlink, or is the
19 URL the hotlink, or is it something else?

20 A Well, the graphic alone wouldn't be
21 clickable if it weren't inside an anchor tag. And
22 so as we were talking about earlier, the graphic

1 alone in isolation -- if someone just put in a
2 graphic doesn't make it clickable. What makes it
3 clickable, in the sense of a user can click on it
4 like a web link or hyperlink, is that it's
5 specified to be in an anchor tag. That's how you
6 tell it -- tell a browser to render a hyperlink.
7 So the anchor tag is an example of what could be a
8 hyperlink and what creates a hyperlink.

9 There can be programmatic ways, like
10 image maps and whatnot, but a person of ordinary
11 skill would have understood that this code -- this
12 HTML code, it's what everyone used to create
13 hyperlinks. It's -- at the base level.

14 And so everyone knew how to, you know --
15 you know, when you're talking about web pages,
16 you're talking about web servers like they are in
17 Rothschild, a person of ordinary skill would
18 understand that the language of web pages is HTML
19 and that even, you know, selecting the ads to be
20 shown as an interactive ad on a -- like a mail
21 browser, for example -- which I think Rothschild
22 does talk about for sending these messages -- a

1 person of ordinary skill would understand that's
2 the language you use to create these hyperlinks.

3 And the hyperlink is the whole anchor
4 and the image that is specified to be within the
5 anchor tag or the text. The example I gave with
6 just an image, we looked at -- we were looking at
7 earlier.

8 So an image itself isn't necessarily a
9 hyperlink. An image, when included inside an
10 anchor tag, turns that image into a clickable item
11 in a web browser or other, you know, rich email
12 reader, for example, that a user can click on and
13 retrieve further web page.

14 What I mean "activate the URL," I mean
15 it allows the user to click on that image as
16 specified to be inside an anchor tag, and whatever
17 href property is specified with that anchor tag,
18 when the user clicks the image, the browser will,
19 you know, navigate to that URL and display the
20 page at that URL.

21 So I think -- I'm not saying here that
22 the URL alone is the hotlink, right, I think

1 that's -- I think that's what your question is
2 about, but that the URL is part -- a property of
3 the overall hyperlink.

4 Q Okay. I think I understand.

5 So then if -- when we're talking --
6 let's just limit this question to the types of
7 graphics that can be interacted with. So let's
8 just say the Rothschild example of an interactive
9 ad.

10 So putting aside the static ads where
11 there's no URL, just to focus on that, in the case
12 where Rothschild has the interactive
13 advertisement, then the -- if I'm understanding
14 you right, that interactive advertisement is the
15 hotlink. Am I getting it right?

16 A I mean the interactive advertisement of
17 Rothschild which has a link, not just the static
18 one, is an example, I think, of what a person of
19 ordinary skill --

20 (Reviewing.)

21 It is an example of something the user
22 could interact with that causes an action to be

1 performed.

2 So if you look at paragraph 42 of my
3 Declaration, I talk about that issue there, which
4 is just what we're talking about, I think, that a
5 person of ordinary skill would have recognized
6 that Rothschild's interactive advertisement is
7 teaching the hotlink concept of the claim is an
8 example of something that they would have
9 considered within the scope of the term "hotlink,"
10 because interaction with Rothschild's interactive
11 advertisement causes an action to be performed.

12 In this case, the specific example we
13 were talking about in the other section just now,
14 that a URL is activated in the sense that when the
15 user interacts with it by clicking, the action is
16 to open up a web browser and to navigate to the
17 page specified in the interactive advertisement by
18 the URL.

19 Q Okay. So I think I may understand.

20 So the URL itself, that provides an
21 address, let's say, for example, but you're saying
22 the URL itself is not what you're referring to as

1 a hotlink. What you're referring to as a hotlink
2 is the interactive advertisement that contains the
3 URL. I guess the URL -- let's see. You're
4 quoting the Rothschild patent here.

5 The URL is embedded within the
6 interactive advertisement, as you say in this
7 quote, but the hotlink is the interactive
8 advertisement, it's not the URL embedded in the
9 advertisement.

10 Am I understanding that correctly?

11 A I think those are examples of what I'm
12 saying in my Declaration, which is the -- you
13 know, in 42, I'm saying that interactive
14 advertisement is an example of something that a
15 POSITA would have understood as an example of a
16 hotlink as claimed. And in paragraph 84 there is
17 a URL embedded in such an interactive
18 advertisement.

19 Q Okay. I think I understand.

20 So then if we can turn now to page 34 of
21 your Declaration, and going to paragraph 54, I
22 want to ask you some questions about this section.

1 A Okay. I'm there.

2 Q Okay. Great.

3 So let's see. In paragraph 54 you talk
4 about -- you refer to generating an email so the
5 email is the hotlink message, if I'm understanding
6 that correctly. Is that right?

7 A That's what I'm saying, the email is the
8 hotlink message because it contained -- when it
9 contains the interactive advertisement that's
10 selected.

11 Q Okay. All right. And then I'm just --
12 I'm just reading through. I don't need to ask you
13 about every single paragraph here, but I'm just
14 reading it through to make sure I'm following what
15 you wrote.

16 And then in paragraph 56 -- and maybe
17 this reinforces what you were explaining to me
18 earlier -- paragraph 56 you state:

19 The email includes the selective
20 advertisement, which includes the embedded URL.

21 I think I understand now the interactive
22 advertisement is the hotlink and the hotlink

1 includes the embedded URL.

2 Am I getting that correct?

3 A Yeah. I mean I believe that's a fair
4 representation of what we've been talking about.

5 Q Yeah, I just wanted to make sure, that's
6 all.

7 A And these are examples, right, it's not
8 the only thing that could be a hotlink, but within
9 Rothschild, that's what the POSITA would
10 understand is an example of a hotlink.

11 Q And then, let's see, continuing on, I'll
12 skip a few paragraphs that you're of course free
13 to read if you'd like to, but I want to go next to
14 paragraph 62 on page 38.

15 A Okay.

16 Q So there you write that there's an email
17 message that includes the interactive ad that
18 defines how it's to be displayed and then you say,
19 therefore, it renders obvious generating the
20 hotlink message to include the determined action
21 and instructions for rendering and displaying the
22 hotlink.

1 So if I'm understanding this correctly,
2 this and the other parts of your Declaration,
3 you're saying that the interactive
4 advertisements -- or let me just -- sorry, let me
5 make a broader question so that I'm not saying
6 something incorrect here. I'll just ask you what
7 you think.

8 So the determined action -- what is the
9 relationship between the determined action and the
10 hotlink message?

11 A Well, I mean, the determined action --
12 if you look earlier, I talk about that in -- at
13 least in 56, but the determined action is part of
14 the message. It's within the message that's
15 generated.

16 Q Okay. Oh, I see.

17 So in paragraph -- let's return to that
18 for a moment. You just mentioned paragraph 56 on
19 page 35, so if I'm understanding you correctly,
20 then, the -- or no, let me once again not try to
21 say things the wrong way and ask you to correct
22 me.

1 So what is the relationship between the
2 embedded URL and the interactive advertisement and
3 the determined action?

4 A Sorry, you said a bunch of things and I
5 don't -- I just want to understand exactly what at
6 least those three things you're asking about are.

7 Q Yeah, no problem.

8 I started talking, and I shouldn't have
9 spoken, I should have thought first, so let's
10 clear the slate.

11 So in paragraph 56 you refer to a few
12 concepts, the email, the interactive
13 advertisement, the embedded URL, and the
14 determined action.

15 And I'm just trying to understand what
16 is the relationship between the selected -- sorry,
17 what's the relationship between the interactive
18 advertisement and the determined action?

19 A So the interactive advertisement
20 includes an embedded URL, and it's the URL which
21 defines the determined action.

22 So in this case, you know, we were

1 talking about -- previously about the various
2 schemes of URLs, and that one is like http://, and
3 then a path with a server, and so that's -- that's
4 what defines the determined action, because that
5 means that if you click on the -- whatever causes
6 the anchor to be activated, or to be -- when the
7 user interacts with the hyperlink and they click
8 on it -- in this case, it's an interactive
9 advertisement -- it brings up another web page,
10 and the URL specifies what protocol to use -- what
11 application to use, really, also -- and then what
12 page to go to. So that's what the URL says.

13 If it's http://product
14 company.com/product 1.html, for example, then it's
15 saying bring up the web browser and navigate to
16 that page in the web browser. So that's the
17 action. The URL defines the determined action.
18 And that's the relationship.

19 Q I think I understand.

20 Now I'd like to turn to page 41 of your
21 Declaration and paragraph -- I'm sorry, page 25 of
22 your Declaration, paragraph 41.

1 A Okay.

2 Q So you refer here to:

3 Rothschild's server identifies the
4 "trigger" when it provides the sending user's
5 device with the page 402 that contains the
6 pull-down menu.

7 Do you see that language?

8 A Yes.

9 Q Okay. So in this paragraph, if I'm
10 understanding you correctly, the trigger is the --
11 well, maybe once again, let me not -- let me ask
12 you what you meant instead of saying something and
13 then maybe getting it wrong.

14 What is the relationship between the
15 trigger and the pull-down menu?

16 A So the pull-down menu contains a number
17 of different advertisements that can be selected.
18 So if you look at the figure, you know, just above
19 that paragraph, that pull-down menu presents, or
20 lists, or palette I say here, of different
21 advertisements, and when a user selects that
22 drop-down menu in composing this message, when

1 they select a specific one, they can then have
2 that inserted into the message they're composing
3 in Rothschild.

4 Q And I think I understand what you're
5 describing as the pull-down menu, and so what is
6 the relationship between that pull-down menu 404,
7 I think it is in the figure, in Figure 4, that you
8 cite in your report, what's the relationship
9 between this pull-down menu 404 and the trigger?

10 A So as you know, I have one -- I have a
11 few alternative mappings of the trigger of --
12 identify the trigger, and in this mapping, the
13 server identifies the trigger when it provides the
14 sending user's device with the email communication
15 page that contains the pull-down menu. So that's
16 how the server identifies the trigger.

17 The user is accessing this composition
18 page over the web, and it says that in Rothschild
19 somewhere, I think I cited to it somewhere.

20 And then the server, in composing this
21 page, has to fill out this list of everything
22 that's going to appear in the drop-down.

1 And so that's -- when it provides all
2 that information so the user's device renders this
3 page, that's where I say it's an example of the
4 Rothschild server identifies the trigger.

5 Q Okay.

6 MR. CLEMENTS: We've been going for
7 about an hour and a half. Okay if we take a break
8 when you finish your line of questioning?

9 MR. HIGGINS: Oh, certainly. And in
10 fact, Dr. Houh just answered a question, so I
11 think that's an excellent idea, thank you.

12 Would it be okay with you, Dr. Houh, to
13 take about a 10-minute break? So let's say we
14 come back in about 10 minutes. Would that be
15 enough?

16 THE WITNESS: That would be great, thank
17 you.

18 MR. HIGGINS: Okay, thank you.

19 (A recess was taken at 1:32 p.m.)

20 (Back on the record at 1:42 p.m.)

21 MR. HIGGINS: Dr. Houh, are you okay to
22 proceed?

1 THE WITNESS: Yes, I am, thank you.

2 MR. HIGGINS: Okay, great.

3 BY MR. HIGGINS:

4 Q So in terms of identifying the trigger,
5 before we took the break, you were referring to,
6 in paragraph 1, identifying the pull-down menu,
7 and you mentioned that you had multiple -- I'm
8 sorry, the word -- you had made multiple ideas,
9 let's just say, about the trigger.

10 So could you tell me about other --
11 there's another notion of trigger that you
12 referred to in -- sorry, let me get to the page
13 further down in your Declaration in the same
14 neighborhood, on page 28, and on paragraph 45, you
15 refer to this.

16 Additionally, Rothschild identifies a
17 trigger when it receives the advertisement data
18 representing user selection.

19 Could you explain what you mean by that?

20 A Sure. So this is an alternative, a
21 second way that Rothschild discloses identifying a
22 trigger to generate a hotlink.

1 So in this way, the user clicks the
2 drop-down menu, and they -- there's a list of
3 different advertisements that can be inserted into
4 the message, and they select one.

5 And then when the user inserts that,
6 that selection has to be -- is transmitted to the
7 server, and the server then provides the
8 advertisement to be inserted -- to populate the
9 message.

10 So that -- so when the server receives
11 the user's selection, right, that's -- or it's the
12 advertisement data representing the user's
13 selection -- that is when this additional or
14 alternative mapping of identifies a trigger to
15 generate a hotlink is met within Rothschild.

16 So that's what I'm saying here.

17 Q Okay. And so what is the relationship
18 between the user's selection -- sorry, receiving
19 the advertisement data representing the user's
20 selection, what is the relationship between that
21 receipt of data representing the user's selection
22 and the drop-down menu?

1 A So in these drop-down menus, they -- so
2 once the user makes the selection -- there are
3 ways to activate the drop-down menu so things
4 happen automatically, or things -- you know, maybe
5 they push another button that says, you know,
6 "insert ad" or something, but what happens is that
7 that message -- that data gets posted about --
8 which advertisement the user selected gets posted
9 to the web server, or sent to the web server. The
10 web server receives the user's selection.

11 So before the server received the user's
12 selection, they sent all these -- you know, all
13 this information to populate the drop-down list,
14 but the server doesn't know which the user is
15 going to select.

16 So once the user makes the selection and
17 that -- the information about the selection, about
18 which ad they selected, gets transmitted back to
19 the server and received by the server.

20 That is how Rothschild's server
21 identifies the trigger to generate a hotlink.

22 Q Okay. I think I understand.

1 So when the server is receiving the
2 user's -- let me just make sure I get this right.

3 In Rothschild, when the server receives
4 the user's selection of which ad to include, is
5 the server receiving the drop-down menu or just
6 the ad that the user selected?

7 A So in HTML I believe there's an -- to
8 create the drop-down menu on a web page as
9 Rothschild -- Rothschild teaches that this page is
10 a web page that the user can access. So it's well
11 specified how to create a drop-down and how to
12 post the data from a drop-down.

13 I don't have perfect memory of how --
14 I've done this before, but sometimes there's an ID
15 that's associated with each drop-down menu, and
16 that selecting a drop-down list can cause that ID
17 to be sent back to the web server, or that ID or
18 other data, perhaps, maybe even like -- could be
19 the ID of the ad that's inserted to be sent back
20 to the server.

21 There are other ways to do it, too.
22 There are -- there's asynchronous JavaScript and

1 whatnot. They're more advanced but still, I
2 think, well within the knowledge of a POSITA how
3 to send data back from these drop-down menus
4 because drop-down menus are a very standard item
5 in any form, and a lot of websites, you know, have
6 input forms like this.

7 So that's what happens, is the data is
8 sent back to this web server once the user selects
9 the particular item within the drop-down menu, and
10 they may have to post it or submit it or it could
11 be programmed to kind of when this select menu
12 changes sending data to the web server.

13 So I've done all those different ways
14 myself, and I think those are all known in and
15 part of the specifications.

16 Q I think I understand.

17 So in that situation, where some data
18 from the drop-down menu is being sent in response
19 to -- let me use fewer words. Let me start over.

20 In that situation you were just
21 describing, where data is sent to the server, the
22 data being sent to the server would be, for

1 example, the user's selection, but it would not be
2 the drop-down menu itself; is that right?

3 A Well, it would be -- I think it would
4 include a reference to the drop-down menu, right?
5 So you need to -- the server needs to know
6 which -- there's identifiers -- if you have
7 multiple drop-down menus, you can make multiple
8 selections, the server has to know, and does know,
9 the standard that describes how you map these
10 things to each other.

11 But it would -- we talk about which
12 drop-down menu and which item in a drop-down menu,
13 but if you're asking me is it the whole drop-down
14 menu itself that's sent back? I would say no,
15 that's not the case, it's a specific identifier of
16 a specific drop-down menu and a specific item
17 selected in the drop-down menu. That's typically
18 what's sent back.

19 And when the server receives that
20 information, they know how to retrieve the ad
21 associated with that drop-down menu and that
22 selection within that drop-down menu, but that's

1 what's identifying -- that's how Rothschild's
2 server identifies a trigger to generate a hotlink,
3 how it uses that information to look -- to
4 retrieve the contents of the interactive ad that
5 the user selected and send it back to the
6 server -- to the client.

7 Q I think I understand.

8 So looking at paragraph 45 of your
9 Declaration, which is in the same neighborhood
10 where we just were before the break, it's page
11 28 --

12 A Okay.

13 Q -- so you have a statement there that
14 Rothschild's server identifies a trigger to
15 generate a hotlink when it receives the
16 advertisement data representing the user's
17 selection.

18 So then I read this and understand that
19 you're creating a relationship between these
20 concepts, but what exactly is the relationship
21 between identifying the trigger and receiving the
22 advertising data representing the user's

1 selection?

2 In other words, is the receipt the
3 identification, for example, or is the
4 identification related to the receipt, and if so,
5 how is it related?

6 A Well -- so before the server receives
7 anything, it wouldn't know what the user selected,
8 right, so when the user receives the data -- I
9 mean I'm -- you know, that's being identified to
10 the server.

11 I mean the server is looking at the
12 data, the server is not just throwing it away and
13 receiving it, right, the server is using that data
14 to further continue the processing.

15 So it's -- I say it's identified when
16 the server receives it, but really the reception
17 includes, you know, the server actually, you know,
18 processing the message, and that's how it knows
19 which -- which advertisement the user selected.
20 Otherwise, you know, it wouldn't know. But it
21 does because this information is -- it's a
22 server-based system, and Rothschild is teaching

1 that the server receives the compilation of data
2 which includes message data, sender data and
3 advertisement data.

4 Q I think I understand what you just said.

5 So then in that situation the -- so
6 Rothschild's server is identifying a trigger
7 because it determines which advertisement the user
8 selected; is that right? Or is there -- am I
9 getting that wrong?

10 A No, it's -- well, as you know, there is
11 a separate determining action, primarily the
12 claims as well. But when it receives it, you
13 know, it -- and now you've identified it to the
14 server. I mean, once the server kind of
15 recognizes it.

16 And so, you know, we -- I am talking --
17 if you want to look at the determining section,
18 there is -- I talk about that there, and with
19 respect to the first way that I talk about earlier
20 in this section, how Rothschild discloses
21 identifying a trigger to generate a link, there's
22 separate analysis in determining which talks about

1 another part of the process, too.

2 I mean if you're asking whether or not
3 there is a similar discussion with determining
4 with respect to when the server receives that, I
5 think there is, we can look at that.

6 Q Oh. Yeah. And that's an excellent
7 point, and I do want to look at that as well.

8 Before we move on from this section, I
9 just wanted to focus on the identifying -- and I
10 may have misspoken and said the word
11 "determining," but I'm not trying to confuse the
12 two concepts here; I'm trying to understand what
13 you wrote in paragraph 45.

14 With that clarification, let me try and
15 ask a better question that doesn't bring in other
16 things.

17 So I'm focused specifically on the
18 identification part, and I see that you talk
19 about -- in paragraph 45 about receiving the
20 advertising -- advertisement data representing the
21 user's selection, and what I'm trying to
22 understand is can you be more specific about what

1 exactly the identification is in Rothschild of the
2 trigger so -- you know, I understand that it has
3 something to do with receiving the user's
4 selection, but what is the identification that
5 you're referring to?

6 MR. CLEMENTS: Objection. Form.

7 A (Reviewing.)

8 I mean -- so what I'm saying here is
9 that it's -- you know, the user receives this
10 identification -- sorry, the server -- the user
11 makes the selection in the drop-down menu, and
12 Rothschild teaches that the server receives
13 compilation of data including the advertisement
14 data, but in order to kind of -- for this web
15 form, you know, to show that they inserted the
16 advertisement, the server would have to first --
17 the user would have to first select one of them,
18 right, and I think Rothschild describes that. You
19 can look in my Declaration; I talk about that.
20 And then the server receives the selection. Or
21 data representing the user's selection.

22 And it's because that the server

1 receives the user's selection that it prompts the
2 server to insert the selected advertisement into
3 the email message. The server has to send
4 something back for something to show up on the web
5 form in the user's message composition window.
6 And that's how Rothschild is described to work.
7 And that advertisement is inserted in.

8 So it's -- the server identifies the
9 trigger to generate a hotlink. When the user
10 makes their selection and the server then has then
11 received the selection, and it's now that that
12 specific user selection is now identified to the
13 server, and as we talked earlier, the URL, it says
14 what action to take. And the list specifies which
15 interactive advertisements can be inserted.

16 And so that -- that's how the server
17 identifies a trigger to generate a hotlink.

18 Q Okay. And I think I understand.

19 So if I'm understanding correctly, then,
20 Rothschild's server will -- at some point receives
21 a compilation of data that includes the ad that
22 the user selected, and when the server -- let's

1 say -- I want to use some word besides
2 "identified" in the sentence, but let's suppose
3 the server parses that compilation of data and
4 it -- in part of doing that, it can figure out
5 that part of that compilation of data is the ad
6 that the user selected, is that what you're
7 pointing to for when the server identifies the
8 trigger, it figures out that the user has selected
9 a particular ad and which ad that is?

10 A I mean that -- as I said, I mean it's --
11 you know, it's when the server receives it, but
12 I'm assuming that the server is actually, you
13 know, receiving and doing what it needs to do with
14 it.

15 And part of that is that it can see
16 right from that message the advertising data that
17 tells the server which specific ad was selected,
18 and so it's that receipt, and then the server
19 now -- the specific -- the hotlink that will be
20 used is now identified to the server because it
21 contains the information about the selected
22 advertisement.

1 Now, I mean this is the case where the
2 user actually selects an interactive advertisement
3 as opposed to a static one, but assume that, you
4 know, when it's -- when it is interactive, this
5 data that comes back about the user's selection
6 now has identified to the server which specific
7 hotlink the user has selected.

8 So I think that's how it is, is upon
9 reception by the server, but now the server has --
10 can identify which user the selection -- sorry,
11 user selection was made, and then now can use that
12 information to actually retrieve that from its
13 data store.

14 Q Okay. I think I understand. All right.

15 Then let's now turn to the detection
16 part that you were referring to before.

17 So on page 29, the next page of your
18 Declaration, you have a paragraph 46, and what I'd
19 like to point you to there is the sentence where
20 you say, when the server receives the user's
21 advertisement selection, and then you have in
22 parentheses, detection of the trigger, so can you

1 tell me what is the difference, if any, between
2 detection of the trigger from receipt of the
3 user's advertisement selection and identification
4 of the trigger which, if I understand correctly,
5 you're also saying is the receipt of the user's
6 advertisement selection.

7 A (Reviewing.)

8 So what I'm saying here in paragraph 46,
9 for example, is that when the server receives the
10 user's advertisement selection, that's the
11 detection of the trigger, and that applies to both
12 those instances I talk about in the previous
13 element, where one of them was where Rothschild's
14 server identifies the trigger in paragraph 41,
15 when it provides the sending user's device with
16 the email communication page that contains the
17 pull-down menu, and to the alternative, or second
18 case, where -- we were just talking about when
19 it's -- when Rothschild's server receives the
20 advertisement data representing the user's
21 selection.

22 So I think it's detection, and I think I

1 might have said the word "determining" earlier
2 when I was saying something. I think I meant
3 detection step that we're talking about here. In
4 one of my answers.

5 I -- yeah, so -- but it's -- the
6 detection step here is, you know, disclosed by
7 Rothschild when it receives the -- in one example
8 this says, when it receives the compilation of --
9 when it receives the user's advertisement
10 selection, and that's detection of the trigger.

11 But again, it equally applies to both
12 situations of the identification which we talked
13 about.

14 Q Okay. Well, I do want to explore both
15 of those concepts, but let's start with the
16 identification versus the detection.

17 So when it comes to the server in
18 Rothschild receiving the user's advertisement
19 selection, are you saying that the same act is
20 both identification and detection?

21 A (Reviewing.)

22 I mean I think that's the reception I am

1 talking about as part of what satisfies one of the
2 reasons Rothschild is disclosing the identifies a
3 trigger to generate a hotlink step, and I think
4 it's fair to say that it -- receiving this is
5 also -- I also am saying here that it includes --
6 is disclosed by Rothschild when the server
7 receives the user's advertisement selection,
8 that's also detection of the trigger, but there's
9 also the case where the server has identified
10 the -- identified the trigger when it provides the
11 sending user's device with the email communication
12 page that contains the pull-down list, and it's
13 listing them all out and providing them to the
14 user's device.

15 So there's a few different ways that
16 Rothschild discloses identifying a trigger, and
17 what's here in this discussion in paragraph --
18 starting in paragraph 46 is an example of
19 another -- a way that I'm talking about that
20 discloses why Rothschild is disclosing the
21 detection of a trigger.

22 And it so happens that this is

1 similar -- the reception of the advertising data
2 is similar or -- you know, to the second of the
3 things I discuss in the previous claim element
4 section.

5 Q Okay. Well, let me keep the two -- I
6 understand that you have the two examples, and let
7 me just keep the examples separate, just so the
8 record is more clear and just make it easier for
9 us to be talking about the same thing.

10 In terms of receiving the user's
11 advertisement selection, so putting aside for a
12 moment the drop-down menu in a larger sense and
13 focusing only on the user's advertisement
14 selection, if I'm hearing you right, you're saying
15 that the receipt of the user's advertisement
16 selection is both identification of the trigger
17 and detection of the trigger; is that right?

18 A If you're only talking about the second
19 -- there are two different ways I talk about
20 identifying the trigger -- or the claim -- the
21 previous claim element, which is 1.1, maybe.

22 (Reviewing.)

1 I thought it was 1.1.

2 Q I think you're right, because on this --
3 sorry to interrupt, but just to make you more
4 comfortable that you're right, this page 29 has
5 1.2. So I'm pretty sure that the previous one is
6 1.1.

7 A Yeah, I see it now. It's at the very
8 bottom of page 23, just like dangling the heading,
9 so I missed it the first time. But yes, 1.1.
10 Thank you for that.

11 In 1.1 I do identify one way Rothschild
12 discloses identifying a trigger to generate a
13 hotlink is when the server of Rothschild receives
14 the advertisement data of the user's selection.

15 And in 1.2 I am talking about with
16 respect to detecting a trigger, it's when the
17 server receives the user's advertising selection.

18 And so in that case, I'm not denying
19 that those -- it's the same reception that I'm
20 talking about, but there is the case in 1.1 where
21 there's the other identifying step which this
22 also -- the 1.2 discussion also applies to, is

1 where the identification is when the server
2 provides the sending user's device with the email
3 page form that has the drop-down menu and it's
4 identifying the trigger there as well.

5 And in this case the receiving step is
6 different than the providing that I'm discussing
7 in 1.1.

8 Q Understood. Okay.

9 So then turning to the additional
10 example that you were focused on in the last part
11 of your question [sic], the drop-down menu itself
12 now, if we turn to that as opposed to receipt of
13 the user's selection of the ad, I didn't see in
14 your Declaration -- maybe I missed it -- I don't
15 see you stating that there's any detection of the
16 drop-down menu.

17 Am I missing something? Are you saying
18 there is a detection of the drop-down menu?

19 A Well, I mean are you talking about 1.2
20 or 1.1? I'm not really sure.

21 Q 1.2.

22 A Okay. It's detection of the trigger.

1 So it is providing the whole drop-down menu, but
2 the drop-down menu provides a list of all the
3 available interactive ads. And assuming, you
4 know, that -- well, there are going to be -- I
5 mean Rothschild does teach that the ads can be
6 static or interactive, in which case the
7 interactive ad, when selected.

8 So any of those could -- any one -- I'm
9 not saying -- I think you're asking whether I'm
10 saying the triggers are the whole selected
11 drop-down -- like all of the drop-down menu? Is
12 that what you're asking?

13 Q Yeah. Well, let me ask that, that's a
14 great question. Why don't you answer that
15 question, then I can follow up as needed.

16 A I don't -- that's not what I'm saying,
17 is that the whole of the drop-down menu is the
18 trigger. The trigger is identified because there
19 are any number of triggers that the users can
20 select within the drop-down menu.

21 And so it's -- but the server is
22 identifying any of the triggers that the users can

1 select in that process of providing them --
2 providing the -- by the server to the client
3 device the whole drop-down menu.

4 And then once the user selects one of
5 them, that that identity -- that trigger is -- can
6 now be -- it's detected by the server when the
7 server receives the user's selection of a
8 particular trigger. Or a particular one of those
9 advertisements which, you know, when -- then in
10 the message when selected, it would cause the
11 action to occur.

12 So that's an example, I think, of the
13 different -- you know, all the different ads that
14 provide it within the selection menu, any of them
15 could be selected by the user.

16 Q Okay.

17 A But the actual trigger that eventually
18 causes, you know -- but the claim trigger then
19 would be the one that's actually selected and sent
20 back. Do you know what I mean?

21 Q I think so, yeah. I think I understand
22 now.

1 Now I'd like to turn to page 37 of your
2 Declaration, and paragraph 60. And you're
3 referring to an example of HTML. And let me just
4 get to the right place here.

5 So in this paragraph 60 on -- I'm
6 actually more interested on the portion of
7 paragraph 60 that's on page 38, but of course
8 you're free to read the first part of the
9 paragraph, too.

10 So you're referring to a JPEG file. The
11 example you give is graphic.jpg, and then you also
12 refer to -- at the end of the paragraph you're
13 referring to HTML code that acts as instructions
14 for rendering and displaying a hotlink.

15 And when it comes to the instructions
16 for rendering and displaying a hotlink, I am
17 wondering what is the relationship between those
18 instructions and, on the one hand, the HTML code
19 and in addition, the JPEG file graphic.jpg.

20 A So you're referring to both 60 and the
21 code above in paragraph 59? Is that what you --

22 Q I think that it's fair to say since it's

1 about the previous example. But my question might
2 not have been clear.

3 What I was really getting to is, okay, I
4 -- in that HTML code example, you're referring to
5 a JPEG, and the JPEG wouldn't be -- you know, it's
6 referred to in the code, but the JPEG file itself
7 is not going to be in the HTML code.

8 So when you talk about HTML code that
9 acts as instructions for rendering and displaying
10 a hotlink, I'm trying to figure out when you're
11 talking about those instructions, are you
12 referring to the HTML code itself, or the JPEG
13 file, or some combination? Or am I just lost and
14 you're referring to something else?

15 A It's -- you're specifically asking about
16 the -- there's a lot of stuff there, but one thing
17 I remember is you were asking about this
18 graphic.jpg and that -- what actually happens.

19 So when you have an image tag in HTML,
20 that's IMG. That -- I call it an image tag. The
21 source property of the image tag specifies a URL
22 at which the image can be accessed.

1 So in this case when it's just
2 graphic.jpg, it's really relative to the document
3 path just like, you know, if you already have an
4 open file directory, like graphic.jpg would be in
5 this same directory on the web server as the
6 current web page that's referencing it. So this
7 is an example of a relative URL relative to the
8 current document's web address.

9 So this would be -- the image source
10 equals graphic.jpg instructs the, you know,
11 renderer of this HTML to retrieve the file
12 graphic.jpg from the same directory from which it
13 retrieved the particular page you're viewing.

14 So I mean you can specify -- this is
15 just an example here. You could specify the whole
16 path, including the name of the web server that
17 you want to retrieve it from, but the source
18 property tells the browser to go out and retrieve
19 the particular file specified by the URL, which
20 it's saying it's an image, and if it's a file
21 image type that the browser can handle natively,
22 then will render that image at this location

1 inside the -- in this example, inside the anchor
2 link -- inside the anchor tag -- which specifies a
3 hyperlink action to be performed, or an action to
4 be performed when the user clicks on the image
5 that's rendered.

6 Q And then maybe it is helpful to look at
7 the specific example you gave in paragraph 59. As
8 you said a moment ago, that's -- the paragraph 60
9 that I pointed to is related to your previous
10 paragraph, 59, with this example.

11 So in this -- the example HTML code that
12 you have in paragraph 59, what I'm focused on is
13 this HTML example and the last part of your
14 paragraph 60 about instruction -- HTML code that
15 acts as instructions for rendering and displaying
16 a hotlink.

17 So this example -- HTML example you gave
18 in paragraph 59 is short and sweet with three
19 lines, so what part of that HTML code is
20 instructions for rendering?

21 A (Reviewing.)

22 Well, there's two things I'm discussing

1 here. One is that the HTML code that -- that
2 discusses how to render that whatever the anchor
3 is going to be because it specifies the specific
4 image.

5 And then furthermore, additionally, as a
6 second way Rothschild discloses instructions for
7 rendering and displaying the hotlink is that the
8 data of the image itself also specifies what's
9 going to be displayed.

10 If you have a different image file,
11 you'll get a different image, and that data
12 specifies how to render that particular ad image
13 or image, whatever image is referred to when
14 ultimately rendered.

15 So I think it's done in the two ways
16 that I'm describing, which is the HTML provides
17 these instructions, and the data itself of the
18 image also provides these instructions.

19 Q Okay. So in the example code that you
20 give in paragraph 59, then is the instruction for
21 rendering, is that the line that begins with image
22 source and ends equals graphic.jpg? Is that what

1 you're saying is the instruction for rendering?

2 A Well, I have --

3 Q I should rephrase.

4 Is the line image source equals
5 graphic.jpg an example of HTML code that is an
6 instruction for rendering?

7 A Well, it's part of it, but I have all
8 three. So, you know, again, if you just had image
9 source equals graphic.jpg outside of the A, the
10 anchor tag, then it wouldn't be clickable. What
11 makes it clickable is the fact that you put the
12 image source inside an , an anchor tag.

13 And so it's all three lines, really,
14 here that are telling the browser how to display
15 the link and what to display in the link, what
16 image to use, and where to go when you click it.

17 And that's one way I am -- what I'm
18 saying here, that the -- as part of the claim
19 term -- phrase -- "instructions for rendering and
20 displaying the hotlink" is met -- is taught by
21 Rothschild.

22 Q Yeah, and I want to be really clear on

1 this. There's two different words in what -- in
2 the quotation that you're -- at the end of your
3 paragraph 60, there's "rendering" and
4 "displaying." And this is where I want to make
5 sure that I'm really understanding what you're
6 saying.

7 So the three lines of HTML code in
8 paragraph 59, if I heard you right just now,
9 you're saying those are HTML code instructions for
10 displaying, and what I'm wondering -- well, first
11 of all, is that -- did I hear you right? Or
12 maybe -- let's just go step by step to make sure
13 I'm not misunderstanding what you said.

14 Are those three lines of HTML code in
15 your paragraph 59 instructions for displaying?

16 A I mean you're asking about the
17 distinction between rendering and displaying? Is
18 that what you're asking about?

19 Q I eventually want to get there. If you
20 can jump to the end, that's great. I thought I'd
21 better do it step by step to make sure things are
22 clear. Yeah, that's what I'm wondering about.

1 A I mean to render an image really means
2 to kind of -- it's hard to -- it's hard to give
3 these examples.

4 So if you decoded the image into a
5 buffer that will later be used to display, or if
6 you decoded the whole page, it's kind of -- it's a
7 separate step than the actual display, but when
8 you specify, you know, things on an HTML page --
9 or any page, really -- they're rendered and
10 displayed, and there is a difference between that
11 technically, but like I think a person of ordinary
12 skill would understand that when you write HTML,
13 it will be both rendered and separately displayed
14 by whatever browser and whatever computer.

15 I suppose you could -- you know, so --
16 you know, if you've got another window covering
17 part of your browser, right, part of what's
18 underneath on the behind window might already be
19 rendered, but it's not being displayed until you
20 put that window at the top.

21 And so I think there are subtle
22 differences there, but -- but, you know, when

1 you -- when Rothschild talks about these
2 interactive ads, it's not that I'm saying it's the
3 same step, it's saying that the distinction is you
4 can both render and display, and Rothschild is
5 clearly teaching both separately I mean.

6 I mean, I don't know, I don't recall
7 that the '169 patent made any great distinction
8 between the two, either.

9 So I think the same disclosure within
10 the '169 is how -- you know, I think it's got a
11 similar level of disclosure about that
12 distinction.

13 So it would be -- a person understanding
14 the difference in the '169 would also understand
15 the same difference when reviewing Rothschild.

16 Q So I think I understand what you're
17 saying. So in paragraph 59, three lines of HTML
18 code, sounds like you're saying, high level, they
19 would -- they could be understood as being
20 instructions for both rendering and displaying,
21 even though there is a technical difference
22 between rendering and displaying; is that right?

1 Am I understanding you correctly?

2 A Well, I mean no, it depends how hyper
3 technical someone is making a distinction here,
4 and I don't think '169 gets into these hyper
5 technicalities in what it describes.

6 You know, if you're talking about
7 displaying, you know, there's video cards and
8 video drivers that display all code to actually
9 display these things that are rendered on your
10 video screen. So I don't think that's quite what
11 I'm saying.

12 I'm saying these are directions, HTML,
13 how to render a page and that instructions for
14 displaying a page are -- you know, every computer
15 has got instructions to display windows and render
16 items, you know, through the video driver.

17 But what I'm saying is that there's
18 no -- there's no hyper distinction that I saw
19 being made under the '169 patent with respect to
20 that.

21 And so I think it's just the same
22 understanding as for instructions for rendering

1 and displaying, that the level -- the level of
2 disclosure within Rothschild is similar to what I
3 recall in the '169 patent.

4 At least I don't remember it making this
5 hyper-technical difference between instruction for
6 displaying and instruction for rendering.

7 Q Okay. So then what I'm understanding,
8 then, is you're saying in your view for the
9 purposes of your opinions in this case, the three
10 lines of HTML code in your paragraph 59 are both
11 instructions for rendering and they are also
12 instructions for displaying; is that right?

13 A I mean I don't think I said -- I mean
14 I'm discussing certainly what's here in the
15 context of instructions for rendering, displaying.

16 What I'm saying is that this
17 hyper-technical distinction I don't think exists
18 in the context of the '169 patent, and so I think
19 it's understood that -- that the kinds of things
20 discussed in '169 will ultimately be displayed.

21 And in fact, we have figures, you know,
22 within Robinson -- sorry, Rothschild, sorry --

1 that actually show windows that are displayed.

2 And so I'm saying that there -- these
3 are instructions to a web browser to render and,
4 of course, every web browser can then take what's
5 rendered and display it.

6 So I'm not sure I'm -- I'm quite saying
7 exactly what you're saying, but I think if -- but
8 I think it's -- a person of ordinary skill would
9 recognize that whatever instructions render a
10 window or render objects in a window will be
11 displayed and there are instructions for that.

12 But this is -- so -- and that, you know,
13 if you're writing web code, HTML code, your
14 intention is for the web -- you know, there are
15 some directives that don't get displayed, you
16 know, there are some -- you know, if you write
17 scripts and things like that, you can write -- the
18 trick that people used to use, they place text
19 that was the same color as the background on the
20 page for indexing purposes to fool certain -- and
21 they just change the color the same page as the
22 background. And would that be displayed? I guess

1 that's more of a philosophical question, I
2 suppose. But the user couldn't detect the text on
3 the same color background.

4 But certainly the intent of when people
5 write web pages with links and text, the intention
6 is that you -- it will be displayed.

7 So again, I don't think -- if you want
8 to point me to something in the '169 that's
9 talking about this distinction, I'll be happy to
10 take a look, but I don't think -- I think the same
11 way -- the same way Rothschild discloses codes for
12 displaying is really the same level of disclosure
13 that -- we can look -- that the '169 patent
14 discloses instructions for displaying, which is to
15 say that I don't recall it actually talking about
16 the video driver and how the video driver works.
17 It may have, I just don't recall every word in it.

18 I mean I think the '169 did have a very
19 detailed discussion of all the components, you
20 know, and what they were made of and things like
21 that, but I don't think this level.

22 Q Okay.

1 A Most patents have that "similar thing"
2 discussion, I think.

3 Q Okay. Well, if I'm hearing you
4 correctly, then, if we put aside for a moment, you
5 know, what -- whether the '169 asserted patent
6 makes a distinction, et cetera, just to keep this
7 more focused on your Declaration paragraphs 59 and
8 60, what I'm hearing -- and you can correct me --
9 what I'm hearing is that the three lines of HTML
10 code you cite in paragraph 59 are instructions for
11 rendering, and that is true as a technical matter
12 even if you wanted to be hyper technical.

13 They're not necessarily instructions for
14 displaying, but people with skill in the art could
15 understand that the HTML is assumed to be
16 displayed. Is that what you're saying?

17 MR. CLEMENTS: Objection. Form.

18 A What I'm saying is actually Rothschild
19 shows windows like depictions of displayed items,
20 and I think a person of ordinary skill would
21 understand that.

22 What's rendered is related to what's

1 displayed, and because Rothschild actually shows
2 displayed windows, that they're -- it's disclosing
3 whatever instructions to display any rendered
4 items are, you know, that a person of ordinary
5 skill would understand that.

6 I'm just saying that -- you're asking
7 whether the same instructions for rendering are
8 the same for displaying. I think there can be a
9 difference, but regardless of what that difference
10 is, a person of skill in the art would still
11 understand that Rothschild is talking about
12 instructions for displaying because it's
13 displaying these windows. It's displaying
14 messages. And there are examples in Rothschild of
15 the actual displayed windows.

16 Q Okay. All right. I believe I
17 understand.

18 So the instructions for displaying are
19 not -- technically, the instructions for
20 displaying do not come from the HTML code, they
21 come from somewhere else; is that right?

22 A I mean I would want to look at, you

1 know, what the '169 patent says in more detail
2 about this, I don't recall the detailed
3 discussion, but, you know, like the patent said,
4 you know -- if the patent description said, you
5 know, here's our hotlink and, you know, it does
6 define it, and it talks about actions and it
7 says -- you know, and these are the instructions
8 for rendering and displaying, then I would say
9 well, in the context of that spec, the
10 instructions for a hotlink are both, you know, if
11 the patent spec said it.

12 I don't recall. I don't have the '169
13 memorized. I'm happy to take a look now to see if
14 I can find a discussion of that distinction, but
15 this was not an issue I focused on until --
16 until -- really just until this line of
17 questioning.

18 Q Yeah, and I'm not saying that we should
19 go look at the '169 patent for this, I was just
20 focused on your Declaration.

21 So, yeah, I think, then, if we put aside
22 what the '169 patent did and you were just trying

1 to be -- let's just say that in the context of you
2 trying to be completely accurate, just as a matter
3 of your own -- you know, like you have a -- you
4 had some interest in being completely accurate and
5 it had nothing to do with the '169 patent, so we
6 just take that off the table, it sounds to me like
7 you're saying, to be completely accurate, the
8 three lines of HTML code in your paragraph 59 are
9 instructions for rendering, but they are not
10 instructions for displaying.

11 Am I hearing you correctly?

12 A If I was outside the context of the '169
13 patent, if I were being hyper technical, you know,
14 with the distinction between rendering and
15 displaying, I might, depending how hyper technical
16 I'm getting here, instructions for displaying
17 might really be more about the software video
18 drivers pulling data out of memory and sending
19 them through the video card and the video card
20 software that converts those to signals that drive
21 the monitors that you might say, you know, it's
22 more focused on that, because you don't care what

1 you display, you know, for instructions for
2 displaying, you just care how you display, I
3 suppose.

4 So instructions for displaying, you
5 know, again, outside the context of the '169, may
6 be -- you know, if you were in a very -- you know,
7 if you worked at Nvidia, for example, you might
8 care a lot about instructions for displaying but
9 not care at all about instructions for rendering.

10 Well, not true, I suppose, with, you
11 know, rendering, you know, 3D images down to 2D,
12 but with respect to rendering HTML pages, like
13 they probably don't care. They probably really
14 care a lot about how to display what's in the
15 video buffers and whatnot more so than they care
16 about that.

17 So I mean -- I suppose it depends on the
18 context. I don't recall seeing anything in the
19 '169 context that would say either way, and even
20 if you adopted a hyper-technical distinction,
21 which is not what I'm saying should be applied in
22 the '169, you know, even if the '169 doesn't

1 really say, you know -- you know, if the user sees
2 the same level of disclosure in various documents
3 as to what instructions for displaying might be,
4 then I think, you know, other references with the
5 same level of disclosure about instructions for
6 displaying.

7 I think the way a person would
8 understand instructions for displaying in the
9 context of the '169 would be the same, given the
10 same level of disclosure as other references with
11 the same level of disclosure.

12 Q Okay. And now I'd like to point to the
13 part of your Declaration that discusses claim 18,
14 and the entire section starts on page 73, but I'm
15 going to be more focused starting on page 76, but
16 of course feel free to read the surrounding pages.
17 And I would like to point you to your paragraph
18 137.

19 A Okay.

20 Q All right. So in your paragraph 137 --
21 and I want to make sure I understand your point
22 about the assignment, so that's where I'm going,

1 just to let you know.

2 So in this paragraph 137 you refer to
3 the interactive advertisement hotlink, and you
4 also say towards the end, the last part of your
5 paragraph 137:

6 Assigning the graphic to the
7 advertisement is within the scope of the term
8 "assignment information."

9 And I am trying to understand what you
10 are referring to here, and, you know, as we've
11 done earlier today, let me just tell you what I'm
12 getting from this paragraph, and then you
13 hopefully can explain in your own words what you
14 meant instead of me getting things wrong and you
15 tweaking it.

16 But what I'm looking at is -- the
17 interactive advertisement that you're referring
18 to, I believe, is an icon or graphic already, and
19 then you refer to assigning the graphic to the
20 advertisement, and that confuses me because I
21 thought the advertisement is a graphic.

22 So what do you mean by "assigning the

1 graphic to the advertisement" in this paragraph
2 137?

3 A Well, it's an interactive ad, right, so
4 we know that it -- there's a graphic, but the
5 graphic alone outside the context of an anchor tag
6 isn't going to be an interactive ad, it'll just be
7 an ad if it's an ad image, right?

8 So I mean -- and the server, by
9 composition of the message, can control, you know,
10 what elements are within an anchor tag and what
11 are not.

12 And so it's the -- and the HTML tags
13 tell you what's inside an anchor and what's not.
14 And so when you -- when the code, for example --
15 you know, that three-line code we've been looking
16 at earlier is handled -- handles the message that
17 has the interactive ad on it, it's the whole of
18 the -- it's the three lines.

19 You know, as an example of a person of
20 ordinary skill would have known how to code
21 something like that.

22 The fact that a particular graphic is in

1 a particular anchor tag, that is -- that is an
2 example of how the message receipt has that -- or
3 comprises the hotlink and assignment information,
4 and that the assignment information is to assign
5 the hotlink to a graphical control element.

6 So the element image itself isn't a
7 hotlink if it's not within an anchor tag.

8 Q Okay. I believe that I understood what
9 you just said, although I'm still having trouble
10 understanding.

11 In the case where you have an
12 interactive ad -- and let me just provide an
13 example of what I think you're referring to --
14 and, of course, feel free to correct me and
15 provide a different example -- but I think what
16 your Declaration was pointing to was like a
17 certain JPEG graphic and that JPEG graphic has an
18 embedded URL, and that JPEG is a graphic.

19 So I don't understand when you talk
20 about assigning the graphic to the advertisement,
21 in that scenario, what is the graphic and what is
22 the advertisement?

1 A So I think we talked a little bit about
2 this earlier, but the image itself doesn't have
3 any -- an embedded URL. An image itself is just
4 an image. It could be a JPEG, it could be a GIF,
5 it's just the image.

6 And I think -- you know, it's the fact
7 that it's an anchor link that has an image within
8 the tag. The image doesn't have anything
9 embedded. That image is still the same image
10 whether you use it inside the tag or outside the
11 tag.

12 And it's interactive when it's inside
13 the tag in the sense that the user can click on it
14 and then there'll be an action performed and, you
15 know, it'll bring up another web page, as we
16 discussed.

17 These are all examples of what a person
18 of ordinary skill would understand. How some of
19 these meet the claim elements.

20 And so it's the fact that the actual
21 image tag itself. So image is also a tag. It
22 doesn't happen to have a closing image tag, it

1 just says bracket, image source equals URL, close
2 bracket.

3 The fact that the image tag is within an
4 anchor tag is what relates the image itself to the
5 URL. There's no URL embedded in the image. So
6 maybe that's -- I mean -- so your question is
7 assuming that there is an embedded URL in an
8 image, but that's not the case.

9 Images are just images, and they're --
10 and hyperlinks can associate a particular image
11 that's, you know, to be shown with a particular
12 action and website to be -- to navigate to when
13 that image or whatever is inside the anchor link
14 is clicked.

15 Q Okay. I think I understand.

16 So then in Rothschild, when Rothschild
17 is describing an interactive ad, that ad has at
18 least two pieces, there's the graphic for the ad
19 and what Rothschild refers to as an embedded URL.

20 So there's the URL for that ad, and --
21 so both the graphic and the embedded URL are part
22 of the ad. Is that what's happening?

1 A (Reviewing.)

2 Yeah, I think so. Rothschild is talking
3 about embedded -- it does use the phrase "URL
4 embedded within the interactive advertisement."

5 I think maybe the issue here is that
6 it's not saying that the URL is embedded in the
7 image of the advertisement literally, and so it's
8 embedded in the interactive advertisement as a
9 whole.

10 And I think that is perfectly consistent
11 with known methods of specifying anchor links as
12 taught within the HTML spec, which I think a
13 person of ordinary skill would have known how to
14 do and would be really the first thing to turn to
15 when coding up these interactive ads, because that
16 was the only method that I know of at the time to
17 render -- to show rich email.

18 So it's -- the interactive ad isn't just
19 the image, which I think is what you're assuming,
20 it's -- the interactive ad is the whole of the ad
21 that you click on. That's what makes it
22 interactive.

1 And so -- yeah, I mean, maybe that's the
2 source of the confusion here.

3 Q Okay. Then yeah, that may -- you may be
4 right.

5 Then if we scroll down a little bit in
6 your Declaration, continuing the same discussion,
7 so we can add to what you just referred to.

8 In paragraph 138 you talk about the
9 interactive ad includes a graphic and that
10 rendered graphic or icon is a graphical control
11 element, and maybe this relates to what -- the
12 point you were just making.

13 So it sounds like here in paragraph 138
14 you were saying the interactive advertisement
15 includes a graphic, and I think that's what you
16 were just explaining to me.

17 So in the last part of this paragraph
18 138 you say that the rendered graphic or icon is a
19 graphical control element, and I'm also unclear on
20 this part.

21 So how is the graphic, like a JPEG file
22 or what have you, how is that rendered graphic a

1 graphical control element?

2 A So it will -- it will show the actual
3 graphic, not -- it's not going to just put an icon
4 with the file name and -- I mean, the intent is
5 to -- in this ad in Rothschild is to show when the
6 user receives the message, to show -- to see the
7 ad. And that one way to do this is a person of
8 ordinary skill would have known really the first
9 thing they turn to is to use HTML to provide the
10 code to create a hyperlink.

11 And when you do that, the image tag,
12 although it references an image, it really like
13 decodes the image and places it at a location on
14 the page.

15 And because it's in an anchor tag, as we
16 spoke about earlier, there might be some
17 indication there -- in the old days, you know,
18 around the time of this patent, there were, you
19 know, borders around images that were clickable in
20 many browsers, and that you could click on it and,
21 thus, interact with the ad in that sense, to bring
22 up another web page that had more information.

1 And so what I'm saying here is that it's
2 not -- it's -- you render and decode the image
3 file, like a GIF or a JPEG file, and that will
4 display -- and it will be displayed, you know, in
5 the window of what the user is viewing when
6 they're viewing this message, and that it's a
7 clickable link, unlike other static images where
8 it just might be rendered but may not be
9 clickable.

10 But in this case, you know, I'm talking
11 about Rothschild's interactive ads that are
12 clickable. And when you click on it, you're
13 actually clicking on the image itself, and that's
14 how the user interacts with that particular image.

15 Q So then if I'm understanding you
16 correctly, you're saying in paragraph 138 that
17 because you can click on the image, the image is a
18 graphical control element.

19 Am I understanding what you were saying
20 correctly?

21 A I mean -- so that's what I'm saying, is
22 that the rendered graphic or icon is a graphical

1 control element. But it can be clicked on. And I
2 think it -- I am saying that the rendered graphic
3 or icon is the claimed graphical control element
4 because the user can interact with it by, for
5 example, clicking on it and that will cause
6 another action to occur.

7 Q Okay. And just to make sure I'm clear
8 on this point, if we take a different example of a
9 graphic than the static one, the non-interactive
10 one that doesn't have the embedded URL, would that
11 graphic also be a graphical control element, or
12 would that not be one because it doesn't have --
13 you can't click on it and open the link?

14 A I mean that's not the case that I'm
15 analyzing here. I'm analyzing the case where
16 we're talking about the interactive elements. So
17 I mean what my opinion is about, is about the
18 interactive advertisements being the disclosed
19 graphical control element.

20 Q Okay. I mean that's fair, Dr. Houh, I
21 was just trying to make sure I understood your
22 reasoning by posing this different situation.

1 So I'm not saying that -- I'm not trying
2 to suggest that your opinion was that a static ad
3 also qualified or that you're focusing on the
4 static ad, I'm just trying to make sure I
5 understand what the graphical control element
6 portion is, and it sounded to me like the
7 graphical control element portion is the fact that
8 the ad is -- that -- sorry, that the graphic can
9 be clicked on to open a hyperlink. Is that fair?

10 A What I mean -- that's how the
11 interactive ad disclosed by Rothschild. Any other
12 claim and requirements, you know, what I'm saying
13 is that for the purpose of this element, certainly
14 the image that's actually rendered and displayed
15 to the user so they can click on it, that image,
16 that is part of an interactive advertisement.
17 That's the graphical control element. That's what
18 I'm mapping to the graphical control element of
19 the claim.

20 Q Okay. And I think I understand.

21 So how, then, can you decide whether a
22 rendered graphic is a graphical control element or

1 not?

2 A How can who decide?

3 Q How do you, Dr. Houh, decide whether a
4 rendered image is a graphical control element or
5 not?

6 A So what I'm saying is that the
7 interactive ads as taught by Rothschild, where you
8 can click on it and, you know, it takes the
9 actions that are described in Rothschild. Those
10 are the interactive ads.

11 And the image that's specified to be
12 shown in the -- you know, when that ad is
13 displayed and the message is viewed, that image,
14 as part of the interactive ad, is the graphic
15 control element because it -- I think it basically
16 -- it meets all the other requirements, so it
17 would -- it's the claimed graphical control
18 element as arranged in claim 18.

19 Q What would be an example of a graphic
20 that is not a graphical control element?

21 A (Reviewing.)

22 Well, I mean the claimed graphical

1 control element has to be -- is the one that meets
2 all the elements where it's discussing the
3 graphical control element in claim 18.

4 So it would have to be one that -- in
5 response to activation of the GCE, for short,
6 executing the instructions of the hotlink to
7 perform the action.

8 So if it didn't meet that term, then
9 whatever image wouldn't be a graphical control
10 element. If it did some other action that is --
11 and didn't execute instructions of the hotlink to
12 perform the action, like maybe it shut down your
13 computer, or it did something different, but not
14 what the claim says, then it wouldn't be the
15 claimed graphical control element.

16 But in Rothschild, it is -- I've done
17 the mapping, as I laid out, and when you click on
18 that link, it does perform an action of opening up
19 a web page to a specific URL.

20 And so it is performing, you know, all
21 the steps as I discuss here in my analysis in
22 claim 18.

1 Q Okay. Does that phrase, "graphical
2 control element," have meaning to you outside of
3 the '169 patent?

4 MR. CLEMENTS: Objection. Scope.

5 A I mean, you know, my analysis -- I
6 actually, you know, reviewed the '169 patent in
7 the context of the spec and prosecution history,
8 and I think that the examples I've given in
9 Rothschild -- this example is consistent with
10 that.

11 I don't think the -- I'm not -- I'm
12 looking and trying to search the '169 patent here,
13 but I don't -- and I haven't found that acronym or
14 entire phrase, "graphical control element" really
15 discussed in any detail.

16 So I mean -- I mean I think it --
17 what -- my analysis was just applying the plain
18 and ordinary meaning in the context of the
19 specification, and I think the applications of
20 Rothschild is consistent, and that's how I
21 would -- would be an example of what a person of
22 ordinary skill at the time looking at the context

1 of the '169 patent spec would understand is a
2 graphical control element as claimed.

3 Q Yeah, so I understand that you're saying
4 that you -- yeah, you analyzed graphical control
5 element for the purpose of your opinions in light
6 of the '169 patent, and I'm not trying to get to
7 that.

8 Let's go back a year before you ever --
9 let's go back to before you ever worked on this
10 matter. Did graphical control element mean
11 something to you before you had reviewed the '169
12 patent?

13 MR. CLEMENTS: Objection. Scope.

14 A I mean I've worked in a number of
15 different programming environments and whatnot. I
16 don't recall hearing this exact term bandied about
17 regularly, like, oh, let's -- but each of the
18 words -- you know, graphics for me means something
19 in -- doesn't mean of graphite, for example, of a
20 mineral. Control, it's a very -- can be a very
21 broad term, and element is a very broad term as
22 well.

1 So, you know, it wouldn't be surprising
2 to me that someone might have used it at some
3 occasion that I once talked to. But I don't
4 recall it being, you know, a term of art in the
5 sense that, you know, it was a shorthand for --
6 everyone knew what it was a shorthand for, because
7 I just -- I don't recall it being used that much.

8 Q Okay. That's fair enough.

9 And I ask this because maybe that could,
10 you know, by -- if there were some other meaning
11 that we could talk about, it would just help me
12 understand what you were writing.

13 So going back then to your paragraph 138
14 where you say that rendered graphic is a graphical
15 control element, what I'm understanding -- and
16 please correct me if I'm wrong -- is that the
17 reason that the interactive ad is a graphical
18 control element and not merely a graphic is
19 because you can click on the rendered graphic to
20 activate it, and more specifically, to activate
21 the embedded URL that related to that graphic.

22 Am I understanding your logic correctly?

1 A I mean you're using a lot of claim terms
2 that are also used in the claim. That's really
3 what's -- and I do show how the use of these
4 interactive ads meets all the different claim
5 laws. I can refer to you what the activate says.

6 I don't recall that's exactly what --
7 the situation you're describing right now, but I
8 have to look. But my analysis laid out in my
9 report with respect to all the claim terms.

10 So with respect to what's happening when
11 a user gets a message, as -- I think that's the
12 context of claim 18, the user's computer -- the
13 user device is -- you know, it's received a
14 message and what it's doing now, but this
15 graphical control element is an interactive ad so
16 the user can interact with it.

17 One of the things they can do is click
18 it and some action can occur. It's just like any
19 other application that's developed. You can click
20 on a number of different things in the interface
21 and some action will occur.

22 This one happens to be defined -- that

1 can be defined by the message that's received,
2 right, that the action to occur is I click on the
3 link, whatever is in the message, in the
4 interactive ad, I click on the interactive ad and
5 I can bring up another web page and there's an
6 action that occurs. You know, when the user
7 selects and interacts with the ad by clicking on
8 it, by clicking on the image of the interactive
9 ad.

10 And so -- so I mean that's -- that's
11 part of why I'm saying a person of ordinary skill
12 would have seen that in Rothschild as a graphic --
13 as the claim graphical control element along with
14 all the reasons it meets the other requirements of
15 claim 18.

16 Q Okay. Yeah, and I'm not -- I think I
17 understand. The reason that I'm just asking about
18 this is just to make sure that I am fully grasping
19 what you're referring to.

20 So it seems to me that what you're
21 saying is the reason that the interactive ad is a
22 graphical control element and not merely a graphic

1 is because the user can interact with the
2 interactive ad by, for example, clicking on it.
3 Is that right?

4 MR. CLEMENTS: Objection. Form.

5 A I mean, a part of why I say this,
6 because that -- that also meets, you know, all the
7 requirements of claim 18 which include in response
8 to activation of the GCE, execute the instructions
9 of the hotlink to perform the actions. I analyze
10 that later, I think, from where we are now, but
11 that's what happens.

12 And I describe, you know, that, you
13 know, user can click on -- interact with it, click
14 on the GCE, and then in that sense, as I
15 disclose -- I can just point you to analysis, it
16 brings up another window. And all those things
17 map to what's being claimed for the GCE.

18 So again, if you couldn't interact, if
19 you saw another image and that when you -- when
20 that image was activated by whatever steps you
21 might say and there were -- it would -- like would
22 have to meet execute instructions of the hotlink

1 to perform the action. And if you didn't do that,
2 it wouldn't meet the claim -- it wouldn't be the
3 claimed graphical control element.

4 And one example I'm talking about that
5 is disclosing the graphical control element is the
6 interactive ad with an image specified as part of
7 that, and that image is the -- is what I'm saying
8 the graphic or icon that's shown to the user
9 and -- rendered in the browser and shown to the
10 user is the graphical -- the claimed graphical
11 control element.

12 Q Okay. All right. So then if we go to
13 your next paragraph, 139, in your Declaration, you
14 refer to, interactive advertisement (hot link) is
15 comprised of "advertisement data" that associates
16 (i.e., assigns) the interactive advertisement with
17 the rendered graphic or icon.

18 And you go on to say that the email
19 message that associates the interactive ad with
20 the graphic or icon to be rendered, and that's
21 assignment information because it assigns the
22 graphic or icon to the interactive ad.

1 So what is the relationship between
2 advertisement data and the URL that -- sorry, let
3 me start over.

4 What is the relationship between the
5 advertisement data that you're talking about that
6 you're referring to in paragraph 139 and the
7 information that you're referring to in 137, for
8 example, the assignment information?

9 A (Reviewing.)

10 Well, one thing I'm talking about up in
11 137 is that really the claim language nor -- or
12 the spec, they don't really provide any further
13 limitation on the term "assignment information."

14 So -- but what's being -- what's being
15 discussed in Rothschild is what a person of
16 ordinary skill would recognize is assignment
17 information.

18 And so if you look at 139, what I'm
19 saying here is that there is a way of assigning --
20 there's advertisement data that is associating
21 that ad with a rendered graphic or icon that's
22 displayed to the user, and that a POSITA would

1 have understood that data contained within the
2 email message that associates an interactive
3 advertisement with the graphic or icon that is to
4 be rendered on the receiving devices displayed as
5 assignment information, because what we know that
6 the whole purpose is -- in Rothschild is to have
7 this interactive ad that the user can click on,
8 and it's described somewhere -- we can look in my
9 report or Rothschild -- to get more information,
10 go to a different URL, things like that.

11 Q Okay. Sorry, go ahead.

12 A Yeah, I'm sorry, I do want to finish.
13 But, you know, Rothschild does talk
14 about an embedded URL within interactive
15 advertisement, but it's within the advertisement
16 as a whole, not just the image.

17 And so that's kind of the point of the
18 interactive advertisement, is to show the URL, to
19 go to the URL when interactive advertisement is
20 interacted with.

21 And so one example is this -- is this --
22 the code -- the same three lines that we've been

1 looking at, you know, many times, which has an
2 image which then is rendered and then it's -- it
3 is associated to a URL, and that's part of the
4 data of a hotlink.

5 And this is -- HTML is an example. And
6 I understand that there's an argument that
7 Rothschild isn't teaching HTML, but it's -- you
8 know, for these interactive links, they're talking
9 about URLs and web servers.

10 It's really the first thing a POSITA
11 would turn to, to create an interactive message
12 that's supported by a wide variety of different
13 email browsers at the time to show rich email.

14 Q And when you're -- just to make the
15 record clear, when you're referring to the three
16 lines of code, you're talking about the three
17 lines of code that are in paragraph 139 on page
18 77, right, and it's repeated elsewhere, but we can
19 just look at this code on page 77 to be looking at
20 the same thing, right?

21 A That is what I'm referring to. And it's
22 basic code. I think anyone, you know, having any

1 experience writing HTML pages would know how to
2 write this code.

3 But one of the first things they learn
4 is how to create anchors. It's kind of the whole
5 point of HyperText Markup Language, is to create
6 hyperlinks.

7 So that is the code I'm referring to,
8 yes.

9 THE WITNESS: By the way, at some point
10 if we could get another break, that would be
11 terrific.

12 MR. HIGGINS: Oh, absolutely. And you
13 just finished answering a question, so why don't
14 we take a break now. How long of a break would
15 you like? Would 10 minutes be okay? Do you want
16 a longer break this time?

17 THE WITNESS: I think -- 10 minutes
18 would be okay. Thank you.

19 MR. HIGGINS: All right, terrific.
20 Well, why don't we do that. Why don't we meet at
21 half past and make it 11 minutes, just be easier
22 to remember.

1 (A recess was taken at 3:19 p.m.)

2 (Back on the record at 3:31 p.m.)

3 MR. HIGGINS: Dr. Houh, are you fine
4 with getting back on the record?

5 THE WITNESS: Yes, I'm good.

6 MR. HIGGINS: Thank you.

7 BY MR. HIGGINS:

8 Q Dr. Houh, in paragraph 139 when you're
9 referring to advertisement data and these three
10 lines of HTML code, can you tell me whether the
11 three lines of HTML code have a relationship with
12 the advertisement data?

13 A (Reviewing.)

14 So advertisement data is a term that the
15 Rothschild reference uses to describe things that
16 make up an interactive advertisement, and I cited
17 to various parts discussing the advertisement
18 data, and that a person of ordinary skill in the
19 art would have known how to take the data
20 disclosed, such as an embedded URL and an image,
21 and create this simple code to -- as an -- as one
22 example of the way, I think, that everybody --

1 well, pretty much everyone would have turned to
2 first to write up kind of rich email type
3 documents. That is, certainly a POSITA would have
4 known about it.

5 And so things like the URL are -- can be
6 coded in this way along with -- where -- the
7 location of a specific image, and in that way
8 that's how the advertisement data of Rothschild
9 relates to this code fragment at the bottom of
10 page 77.

11 Q Okay. So then the code fragment at the
12 bottom of page 77 is an example of advertisement
13 data; am I understanding that right?

14 A It would be a way that a person of
15 ordinary skill would have coded up -- would have
16 known to code up a message in a way that the user
17 could do what's described in Rothschild, which is
18 interact with the advertisement, show the
19 advertisement and interact with it, and then, you
20 know, go to the associated URL.

21 Q And I understand that you're pointing to
22 the code fragment as part of your opinion about

1 Rothschild, but I'm trying to be more specific
2 about your use of the term in paragraph 139 about
3 advertisement data.

4 So is this code fragment on page 77 an
5 example of advertisement data in the context of
6 the Rothschild patent, or how someone -- sorry,
7 let me rephrase.

8 Is this code fragment at the bottom of
9 page 77 a way -- or one example -- hypothetical
10 example of advertisement data as disclosed in the
11 Rothschild patent?

12 A I mean you're equating the two in your
13 question, but certainly the code here includes
14 some of the advertisement data, and a person of
15 ordinary skill would have known how to code up the
16 types of data disclosed into using HTML to create
17 an interactive ad such as disclosed in Rothschild.

18 So I think the point here is that it's
19 not -- your question is about a one to -- as I
20 think it is, about a one-to-one equivalence. I'm
21 not saying that. I'm saying that certainly this
22 code fragment contains some advertising data or

1 references to advertising data, but it's not --
2 I'm not equating them to each other in my analysis
3 here. This is just a way that advertisement data
4 can be used to create this code fragment.

5 Q Okay, that's fair.

6 So in this example of the code fragment,
7 which -- is it the whole code fragment or just
8 part of the code fragment that is advertising
9 data? I mean advertisement data?

10 A (Reviewing.)

11 If you look at the bottom of column 11
12 in Rothschild, Exhibit 4, starting around line 60,
13 it says:

14 However, if the advertisement is
15 interactive, and then the advertisement is
16 interacted with, additional communication data
17 will be provided to the recipient network device
18 130. The location of the additional communication
19 data (or a pointer to the data) is contained in a
20 URL embedded within the interactive advertisement.
21 A URL (or Uniform Resource Locator) contains a
22 unique address which fully specifies the location

1 of data on the Internet. Unlike most
2 advertisement URLs which provide data directly
3 from the advertiser's Web site, the URL embedded
4 within the sender-selected advertisement provides
5 the recipient network device with data from the
6 Web site, and more particularly from the Web site
7 memory device.

8 So this is a description where the URL
9 is data about the advertisement. It tells you
10 where to get additional data about the
11 advertisement in this example here, which is
12 saying what it's saying. But the URL is an
13 example.

14 And the image -- or the reference to the
15 image as well, Rothschild does talk about that as
16 well.

17 Q Okay.

18 A Advertising data, I think. And I cite
19 to those sections elsewhere in my Declaration, I
20 think.

21 Q Okay. So then if I'm -- I think I
22 understood what you said.

1 So I believe, then, the answer is in
2 this code fragment -- HTML code fragment on page
3 77, the entire code fragment is an example of
4 advertisement data.

5 Am I understanding you correctly?

6 A I mean you're equating the two, I'm not
7 equating the two, because there are other like
8 markup tags that you wouldn't consider that. But
9 it's an example -- it does include data about --
10 about the interactive advertisement that's being
11 specified.

12 Q Okay. Yeah, and I didn't -- I'm not
13 trying to make a one-to-one relationship here.
14 Let me ask it a slightly different way to make
15 sure that I'm not -- that I'm taking care of your
16 concern.

17 Is there any part of the code fragment
18 on page 77 that you would exclude as not being an
19 example of advertisement data?

20 A Well, I mean I think -- I'm not -- I
21 haven't really -- advertising data is a term used
22 by Rothschild, I don't think that's a term used in

1 the claims of the '169 patent. But my point here
2 was to describe Rothschild in a way that has some
3 data about advertising.

4 My Declaration discusses some of this
5 throughout, and -- I mean this is a very short
6 fragment here. Look at it and, you know, if this
7 were to define the interactive advertisement, I
8 would say that at least the href has data about
9 the ad -- or the -- sorry, not the href literally
10 itself, but the value of the href here, as
11 indicated by the URL, in reference to the image,
12 is also data about the advertisement as well.

13 So those things are -- I mean I wouldn't
14 call the quotation marks or the equals sign or the
15 angle brackets specifically advertising data.
16 That is the -- you know, those are part of the
17 HTML language.

18 But this is an example. This is just an
19 example of a way a POSITA would have written
20 something like what Rothschild is describing and
21 would have known how to do.

22 Q Okay. And then similar question about

1 the code fragment but for a different term now.

2 When you're talking about assignment
3 information in this paragraph 139, is the entire
4 code fragment assignment information, or is there
5 any part of this code fragment that you would say
6 is not assignment information?

7 A I mean when you have a language here --
8 so, you know, what I'm saying is that the
9 interactive ad disclosed by Rothschild has
10 advertising data that associates the interactive
11 ad with the rendering graphic or icon that is --
12 that is assigned -- you know, the interactive ad
13 is comprised of advertisement data that associates
14 the interactive ad with the represented graphic or
15 icon.

16 And it's -- you know, in a language, it
17 matters where things are, and the ordering,
18 that's -- you know, that's what imparts meaning.

19 So what this fragment is doing is
20 associating information such as a URL with a
21 specific image, and it's done this way when the
22 image is inside the anchor tag, and there are some

1 href property as part of the anchor tag, and that
2 is how images get assigned to respective images
3 that are within anchor tags that are -- that get
4 assigned to, you know, certain URL actions to
5 take.

6 And so when you ask about now specific
7 words, it's more about -- like if you are coding
8 like 1 plus 1 equals 2, it matters which order you
9 code. Well, that may not in that simple example,
10 but it matters, you know, what order you write
11 these things in. You can't just write any of the
12 symbols and just ask about the symbols without
13 actually asking about the grammar, I suppose.

14 Q So in your code fragment example on page
15 77, is the assignment information that tag image
16 source equals graphic.jpg?

17 A I mean it's -- this is associating this
18 specific image, you know, that's provided at the
19 source location with the particular action to take
20 when this image is clicked on. And that's given
21 by the href property of the .

22 Q Yeah, but I'm asking something slightly

1 different.

2 In your paragraph 139 you have this
3 sentence that starts with, the POSITA would have
4 understood, and then you say that this
5 association -- and I'm just paraphrasing, so I
6 don't want to misstate -- I'll let you read that
7 paragraph yourself -- this association -- then you
8 say that is assignment information because it
9 assigns the graphic or icon to the interactive
10 advertisement.

11 And I'm wondering -- I'm asking
12 specifically about, okay, in this code fragment
13 you gave as an example, what exactly is the
14 assignment information?

15 Like, for example, it might be the
16 entire code fragment, but if I'm understanding you
17 correctly, the assignment information is the image
18 source tag; is that right? Or is something else
19 the assignment information?

20 A I mean the image source tag is the --
21 specifies which image. Taking that alone doesn't
22 assign anything to anything. You know, if it's

1 just sitting there, it will display an ad, but it
2 wouldn't be -- it wouldn't be really an
3 interactive advertisement.

4 I'm not accuse -- I'm not -- I
5 haven't -- I'm not saying that the static ads
6 disclosed in Rothschild are what meet the claim
7 elements. What I'm saying is that these
8 interactive ads which have embedded URLs, and this
9 is an example of the interactive advertisement
10 having embedded URL and having an image.

11 And it's this fragment of code
12 structured in the way it is, with the image inside
13 it, that -- where this fragment is effectively the
14 code for an example of code that a POSITA would
15 have known how to write, of an example interactive
16 ad, which now when you show the graphic and its
17 hyperlink when it's rendered in a browser and
18 explained the user can click on this and will
19 cause the program to launch a new window with, you
20 know, requesting the contents of the URL.

21 I mean that's part of what I'm saying
22 here in paragraph 139. I mean the assignment

1 isn't -- isn't any one line, it's the structure of
2 the overall code and the syntax and grammar of the
3 language.

4 Q So --

5 A Sorry, if I might. I didn't mean to cut
6 you off, I just wanted to throw in a point which
7 is -- which is what the HTML language is directed
8 to do.

9 It's to be precise about how you do
10 things, rather than just putting any sorts of tags
11 on the page and hoping that it works. I mean it
12 lays out how you do it, what's the grammar, what's
13 the syntax for various market language tags, what
14 do they do, things like that.

15 Q Okay. So looking at this whole -- these
16 paragraphs 137 through 139, I am still unclear on
17 some aspects. So the interactive advertisement,
18 the hotlink, that's -- I'm getting that from your
19 paragraph 137. Is that right? So the interactive
20 ad is the hotlink? Am I reading that part right?

21 A (Reviewing.)

22 And that is certainly an example from

1 Rothschild of what I think a POSITA would
2 understand is the hotlink. It's Rothschild's
3 interactive advertisement.

4 Q Okay. And this assignment information
5 that you referred to in paragraph 137, is the
6 assignment information -- let me take a step back.

7 In the code fragment on page 77 that
8 we've been discussing in your paragraph 139, let's
9 assume for a moment that this is the relevant
10 href tag for an interactive ad, just to keep
11 things very simple and use your example as much as
12 possible, okay?

13 So if that's the href tag for an
14 interactive ad, is that the assignment, or does
15 that HTML tag -- sorry. Let me start again.

16 That HTML code fragment, does that
17 include all of the assignment information that
18 you're referring to in your paragraph 137?

19 A (Reviewing.)

20 I mean this is a specific example of
21 something a POSITA would have known how to code,
22 reviewing Rothschild, but I think -- I think --

1 you know, Rothschild is talking about these
2 interactive ads that have embedded URLs, so it's
3 actions to take when you click on the links.

4 So I think in this particular code
5 example that a POSITA would have known how to
6 write simply to capture that as an example of
7 what's disclosed in Rothschild.

8 I mean there is some information
9 captured by the words and the data within this
10 link, but also by the syntax.

11 So -- but again, this is -- this -- you
12 know, I believe that -- I think if we look at the
13 disclosures of the '169 to talk about assignment
14 information -- we can look -- I don't recall it
15 being defined in such a way that that really
16 restricts the plain and ordinary meaning. So
17 that's certainly part of assignment information.

18 So, you know, if I have a line of code
19 that says A equals 2, is A part of the assignment
20 information? Sure. Is 2 part of the assignment
21 information? Sure. But it's a fact also, you
22 know, the way it's written, A equals 2, it's not

1 equals -- A equals 2A. That means something
2 different.

3 So the words themselves are part of the
4 assignment information, but so is -- so is the way
5 it's -- the grammar, the way you use those -- that
6 information.

7 And a person of ordinary skill would
8 have known how to use the information in this way
9 in this example to show -- to create a link like
10 that, which is quite a simple way to mark up the
11 interactive advertisement that's described in
12 Rothschild that a POSITA would have known how to
13 do.

14 Q Okay. So the HTML code fragment in your
15 paragraph 139 is an example of assignment
16 information, right?

17 A (Reviewing.)

18 I mean I do say that a POSITA would have
19 understood that the data contained within the
20 email message that associates interactive
21 advertising with the graphic or icon to be
22 rendered on the receiving device's display is an

1 assignment information.

2 And this is an example, because it
3 assigns a graphic or icon to the interactive
4 advertisement, and this is an example of one way a
5 POSITA would have coded it up. Really, the first
6 way they would think of, I think, because that's
7 pretty standard at the time.

8 And Rothschild certainly taught about
9 URLs and web servers and web pages and the things
10 that went into those. You know, marking those up
11 would have been understood by a POSITA to include
12 HTML.

13 Q Yeah. And I'm not trying to -- I'm
14 trying to be -- really just understanding what
15 exactly you're saying your example is, Dr. Houh.

16 So it sounds to me like the answer is
17 yes, the code fragment -- the HTML code fragment
18 in your paragraph 139 is an example of assignment
19 information.

20 Am I understanding that correctly?

21 A I think I -- I think I did say that
22 fragment of code contains assignment information.

1 I'm not equating them necessarily one to one,
2 although the structure of what's laid out here
3 certainly allows the image to be associated with a
4 particular URL and the whole URL -- the whole
5 anchor being an example of interactive
6 advertisement.

7 So the image being included in this way
8 in this fragment in the code allows the user to --
9 when rendered and displayed, allows the user to
10 see the image, see -- and perhaps see that it's
11 clicked on, if that's the default setting to
12 highlight anchors in that way, especially for
13 images, and click on it, at which point a browser
14 window would be opened quoting the contents of the
15 URL specified in this code fragment example.

16 Q I think I understand.

17 In paragraph 138 when you talk about the
18 graphical control element, in this example with
19 your code fragment on paragraph 139 of the simple
20 HTML code fragment we've been talking about, so
21 the hotlink would be the interactive
22 advertisement, it includes this graphic in this

1 example the graphic.jpg file that's rendered, and
2 that graphic is a graphical control element as
3 well, right, I think is what you're saying in your
4 paragraph 138?

5 MR. CLEMENTS: Objection. Form.

6 A When it's rendered and displayed
7 according to the example code fragment, but
8 certainly it's described in Rothschild. It's
9 described as something you can interact with.

10 That rendered graphic or icon is the
11 claimed graphical control element with which the
12 recipient may interact because they can do things
13 like click on it.

14 Q Okay. So then putting this together, in
15 this HTML example, at least, it seems to me that
16 the assignment of the graphic and the href
17 tag, so that assigns the graphic to the
18 interactive ad and it also, because it's part of
19 the href tag, it makes that graphic a
20 graphical control element.

21 Am I understanding that correctly in
22 your example?

1 A I mean these are examples of a way a
2 POSITA would have coded up, but I mean I think
3 it's what's described in Rothschild as -- and a
4 POSITA -- this would have been an easy way for
5 a -- a POSITA would know to code it up.

6 But I think what you're asking was fair,
7 in the sense that this graphic image, when
8 rendered, is what the user can interact with, and
9 when they click it, the action taken is going to
10 the URL specified in the href property of the
11 anchor tag.

12 Because this image is within the anchor
13 tag itself, it's the second line, if you swap the
14 second and third lines, it would be a different
15 fragment of code. It wouldn't show the image as a
16 interactive image. So it's because -- because the
17 image is part of the anchor -- within the anchor
18 tag.

19 Q Okay. I think I see.

20 So then just to make sure I understand
21 that, you just gave a slightly different example
22 of code than what's written on your paragraph 139.

1 If you were to have the slash A line
2 come second instead of third, you would still have
3 the href line, but the image would not be part
4 of the href line, right?

5 A I mean the image already was not part of
6 the line --

7 Q Oh, sorry, let me take a step back.
8 Yeah, I think that wasn't quite what you said.
9 I'm not trying to go line by line, but more -- I
10 tried to capture the concept of what you said.

11 So let me phrase it a different way,
12 then.

13 So in your code as written you have an
14 href line that specifies a URL and the image
15 associated. The image is assigned as part of
16 that -- this code fragment, but if instead you
17 rearranged the code so that the image source line
18 came last, you would still have a link and the
19 action for that link would still be the same URL,
20 but the image shown in your example would not be
21 part of that hyperlink; is that right?

22 A Yeah. I actually think that example you

1 gave is right, because the image tag now falls
2 outside of the anchor tag, it's not within the
3 open tag and the closed tag.

4 So if you close -- if you remove that,
5 then actually just a new line would be part of the
6 anchor tag, and you may or may not be able to see
7 that on a browser, just depending on how the
8 browser is implemented.

9 But the image would no longer be
10 clickable because it's not within the anchor
11 tag -- between the open and closed tags of the
12 anchor tag.

13 And so that's why I'm saying that
14 when -- if you swap the last two lines, it would
15 -- the image wouldn't be clickable anymore.

16 Q Understood.

17 I'd like to turn to page 93 of your
18 Declaration, and that's where you're talking about
19 claim 20, and more specifically, the section
20 starts on page 92 with paragraph 172, and you're
21 free to look at that, but I'm focused more on page
22 93, your paragraph 173.

1 A Okay.

2 (Reviewing.)

3 Okay.

4 Q So I'm going point you to two
5 paragraphs, and you're free to read the
6 surrounding paragraphs as well, but I'm most
7 interested in language that's in paragraph 173 and
8 then on the next page in 177.

9 And I'll just paraphrase that rather
10 than reading the entire thing into the record, but
11 in paragraph 173 you refer to providing feedback
12 about the additional content delivered by
13 interacting with the advertisement, and you refer
14 to a POSITA would have been motivated and found it
15 beneficial to have that additional feedback.

16 And again, I'm paraphrasing. If I got
17 it wrong, you can correct any material thing that
18 I got wrong.

19 And in paragraph 177 you make a similar
20 point about it would be obvious to provide
21 feedback on the advertised product and to include
22 feedback buttons in the email message or within

1 the additional content.

2 And so now I want to ask you some
3 questions about those two paragraphs specifically
4 and the passages I've paraphrased, but as I said,
5 feel free to read the whole section.

6 A (Reviewing.)

7 Okay. I've reviewed those sections.

8 Q So it seems to me that you're -- that
9 this part of your Declaration is saying that it
10 would be obvious to provide feedback about the
11 additional content. So, for example, the content
12 that is delivered after the user clicks on an
13 interactive ad.

14 Am I reading that correctly?

15 A (Reviewing.)

16 Could you repeat that, please, just so I
17 can be sure I got it right?

18 Q Yeah, absolutely.

19 So I believe that in this section you're
20 saying that it would be obvious to provide
21 feedback about the additional content that is
22 delivered when, for example, a user clicks on an

1 interactive ad.

2 A Well, I mean I'm saying -- that is part
3 of what I'm saying, but I am talking about having
4 feedback buttons, either with -- this is paragraph
5 177 -- either within no message, or within the
6 additional content received by activating the URL.

7 So I think part of what I'm saying is
8 it's beneficial to receive feedback and,
9 therefore, it's beneficial to put the feedback
10 buttons both -- or either or both, both would have
11 been obvious -- on the email message itself or on
12 the content page referenced.

13 Q I see. And so what entities would be
14 receiving this feedback and these -- here, let me
15 take a step back because you're pointing out in
16 177 you have these two examples, and I think I
17 understand the difference of the two examples that
18 you're pointing to.

19 So let me first just ask you about both
20 examples and treat them the same way and if we
21 need to, we can talk about them separately. So
22 right now I'll just talk about them -- lump them

1 together.

2 In this situation that you're describing
3 with feedback, what entity or entities would
4 receive the feedback?

5 A (Reviewing.)

6 I'm not seeing where the claims require
7 submission to any particular part of the system
8 here. It's simply -- they simply use the word
9 "submission" in claim 20 which depends from claim
10 19 which depends from claim 18. I don't see any
11 specific requirements there about to whom any of
12 the data is submitted.

13 Q Fair enough.

14 So you didn't -- by making -- inserting
15 words in your mouth -- you can correct me -- but
16 you didn't need to consider that as part of your
17 opinion, right?

18 A If the claim -- you know, if the claim
19 explicitly required a submission to someone, I
20 definitely would have tried to analyze to whom
21 data is being submitted, but I don't see that in
22 the claims.

1 Q Okay. Can you name a real-world example
2 of the hypothetical you pose in your paragraph 177
3 about feedback buttons within the email message?

4 A Well, I'm pretty -- I mean I can't think
5 of a specific one, but I'm pretty sure I have seen
6 email messages with "like" and "dislike" embedded
7 in the email message before.

8 I mean I don't have -- nothing is coming
9 to mind explicitly, but it seems like I have seen
10 email messages with kind of user feedback embedded
11 within.

12 For example -- I can think of an example
13 now. Oftentimes if I go online today and visit
14 like some customer service site like I'm having
15 problems with my Verizon internet service, I fill
16 out my name and email as part of requesting
17 support and as a follow-up, I might get an email
18 back that says, how did your feedback session --
19 or your support session go today, can you rate it
20 from 1 to 10. So I definitely have seen emails
21 like that before.

22 Q But you did not include any examples of

1 those emails in your Declaration, right?

2 A Well, part of what I'm showing here is
3 that Maes is teaching a mechanism by which a user
4 can write content. It would have been obvious to
5 combine the various references for the reasons I
6 give here. And so I think -- I think it's
7 supported by the fact that I have seen emails like
8 that. Now, when did I see those? I don't recall
9 if I've seen that kind of email back then.

10 Another example might be Best Buy,
11 actually. I buy items from Best Buy and a short
12 time later it says, you know, will you rate this
13 item and has some buttons, maybe within the email,
14 to -- well, actually, I don't remember.

15 I know that customer support ones I've
16 seen actually have literally the numbers -- some
17 numbers you can click on to provide a rating right
18 there with the email, and that's all
19 straightforward to code into a rich email as well.
20 I can't -- yeah, so at least I remember that.

21 And the point here is that Maes is a
22 reference that does provide user interfaces with a

1 mechanism for providing your feedback, and that it
2 would have been obvious to combine the references
3 in that way.

4 Q Are you familiar with web servers?

5 A Are you asking generally or --

6 Q Yeah, just generally.

7 A Well, I believe I am. I think I set up
8 one of the first 100 or so web servers ever. If
9 not the first 100, certainly the first couple of
10 hundred.

11 Q Okay. Can you describe what a web
12 server does, just in general terms?

13 A So very generally, just, you know, in
14 the -- not in this context of any specific
15 reference here, a web server is a -- typically
16 would be referring to a server which is waiting
17 for requests from -- in this case, would be a web
18 browser -- and then when it receives the
19 requests -- there's a very specific way to request
20 a document.

21 The web server would return the document
22 requested by the user and, you know, at the

1 beginning it was very simple like that, and then
2 as web servers have evolved, they were able to
3 have templated pages where you could do database
4 look-ups to insert data into the page before it's
5 returned as opposed to just returning a file.

6 But the web servers are basically
7 servers to -- basic -- it's a way for a web
8 request from a client and then return the
9 requested information.

10 Q Thank you.

11 Are you also familiar with email
12 servers?

13 A Yes, I am.

14 Q And could you give -- the
15 description you gave us, exactly what I was --
16 that kind of description I was looking for. Can
17 you give a high-level description of email
18 servers?

19 A Again, at a very high level, email
20 servers can be used to both transmit and receive
21 email, and when you send an email to a specific
22 user, there's a host name associated with the

1 user. So, you know, I have an email like
2 user1@company1.com which might be a -- you know,
3 you're trying to send an email to that person.

4 So company1.com has an email server
5 associated with that domain to which you can send
6 emails to by opening up a connection to the server
7 and saying you want to send an email, who you want
8 to send it to, and then send the message, to which
9 that email server may know -- if it's not a
10 destination server, may know how to transmit that
11 email onwards, or it might have been your email
12 server. So you're at company 1 as well.

13 And the servers basically know how to
14 receive emails, forward emails, and store emails
15 for users whose email server is that particular
16 email server.

17 So that's back in the old days, was --
18 there's a lot -- you know, so back at the time,
19 that's generally how that one email server was,
20 very generally speaking, not in the context of any
21 particular reference we're talking about.

22 Q Have you heard of the

1 Model-View-Controller pattern?

2 A Yes, I have.

3 MR. CLEMENTS: Scope.

4 Q And could you describe that in general
5 terms as well?

6 MR. CLEMENTS: Objection. Scope.

7 A So very generally speaking, there are --
8 for example, I've done a number of websites, and I
9 still program in a program language called Ruby on
10 Rails, and that's very much built into
11 Model-View-Controller framework, I suppose, where
12 the view would specify -- like a view for a web
13 page may specify like a template, and the
14 controller would do back-end work to provide data
15 that can be referenced by views, and the model
16 describes kind of the data model in Ruby on Rails.

17 I want to know how to maybe -- what's
18 the best way to characterize it. It's -- it
19 describes the data model so that when you connect
20 to a database, right, you don't have to know how
21 to connect to the database to write your website,
22 you can access these Ruby structures, even -- and

1 describe relationships between various components
2 of the database, such as what the relationships
3 are between various types of data. And that can
4 be described, I think, in Ruby on Rails models.

5 So I mean a lot of them adhere to
6 similar separations, which is some provide -- you
7 know, there's some part of the system that mostly
8 contains the layout, but not the data, but refers
9 to how to get the data, and other parts of the
10 system that provides logic that might be done in
11 the back end that you might have to crunch before
12 you can present the data, and then other parts of
13 the system relate data to each other.

14 Q Understood.

15 A And this is just generally. I don't
16 think I saw this being referred to in the '169
17 patent or really in any of the other references,
18 but that's generally speaking.

19 Q And then in terms of you were talking
20 about the controller and you've talked about
21 control briefly earlier today as well.

22 So I take it you're familiar with the

1 term "control" in computer science generally,
2 right?

3 A Yeah. I'm not saying there's a
4 relationship between any control we talked about
5 earlier and the controller layer of an MVC-type
6 system.

7 And in an MV -- in a
8 Model-View-Controller type system, there are
9 controllers but, you know, I don't think any of
10 these references are in the context where
11 "controller" has a meaning like that.

12 And even -- so you still might use the
13 word "controller" in a different context because
14 "control" is a very general word.

15 Q Oh, okay. Let me not confuse things,
16 then.

17 So leaving aside the
18 Model-View-Controller discussion, the term
19 "control" in computer science, are you familiar --
20 do you have an understanding of the term "control"
21 generally in computer science?

22 A I mean I think it can be -- it can

1 depend on the context in which -- you know, the
2 area or what you're talking about. So I think,
3 you know, it can be general, it can have meaning
4 that is -- but I think it depends on the context.

5 Q Okay. Well, let's suppose -- let's talk
6 about, say -- let's talk about some context that
7 you have talked about already, just to give an
8 example.

9 If you're talking about, say, an email
10 server -- if this is an appropriate example to use
11 so that we can talk about a particular example,
12 and if not, you can pick a different example --
13 but in the context of, say, an email server,
14 what's your understanding of the term "control"?

15 MR. CLEMENTS: Objection. Scope.

16 A I'm not aware that in email servers
17 there's any -- any particular narrow or otherwise
18 use of the control other than, you know, what it
19 means.

20 Q Okay. Well, then I picked a bad
21 example. Let's say maybe something much simpler,
22 let's just say an example of a router.

1 Would you say that a -- and thinking
2 about the term "control" in general, does a router
3 control routing the data it receives?

4 MR. CLEMENTS: Objection. Scope.

5 A Again, I don't -- I've worked with lots
6 of routers before, I've never -- I don't -- I'm
7 not really aware that I used the word "control" in
8 that way as you've used it. But I mean it's not
9 an inapt description; I'm just not aware that
10 there's a specific use in the way you've used it.

11 Routers -- the purpose of a router is to
12 decide for an incoming packet which outgoing path
13 out to which the router should forward the
14 incoming packet. If you're talking about data
15 network routers, that is.

16 But I mean in that sense, I don't think
17 you're using "control" out of, you know, any plain
18 and ordinary meaning of the word, you know, what
19 it means to anybody, really.

20 Q Okay. So in computer science generally,
21 does the term "control" require that a decision be
22 made?

1 MR. CLEMENTS: Objection. Scope.

2 A (Reviewing.)

3 I mean, you know, just generally
4 speaking here, I'd really have to understand the
5 context of a particular example here. It's -- you
6 know, lacking any specific context, I don't know
7 that any other meaning might apply other than what
8 just -- you just understand "control" to mean.

9 Q Okay. Well, let me try again with a
10 different hypothetical.

11 Suppose you had a really simple
12 application and every time you run the application
13 it shows a screen that simply displays Hello,
14 World, and that application has no other
15 functionality.

16 Do you think that this application
17 controls what's displayed?

18 A I mean certainly in that example if you
19 program something that said, you know, Hello, Jim,
20 instead of Hello, World, the program can specify
21 what the output is, but there's a lot of parts --
22 when you run that program, there's a lot of other

1 moving parts that are at play.

2 So, you know, computer system --
3 computer program systems are abstracted in a way
4 where, you know, people can write fundamental
5 building blocks that can be built upon.

6 So, for example, there's drivers that
7 actually, you know, control what pixel on a
8 display gets what value or interacts with specific
9 hardware. There's libraries that tell you how to
10 interpret strings and -- unique like that and
11 print them.

12 And, you know, you could have a
13 system -- so in many ways certainly that program
14 is specifying what should be displayed, but there
15 are lots of other moving parts and instructions
16 that eventually get executed to actually put the
17 appropriate pixels on the display.

18 Q So yeah, and I understand the point that
19 there could be a lot of other things involved that
20 the application can't run unless there's other
21 stuff that's working with it, but my question was
22 in this hypothetical very simple application where

1 every time you run it, it shows Hello, World text,
2 that's all it does, it doesn't say Hello, Jim, or
3 Hello anything else, it just says Hello, World
4 every time, in that hypothetical, does the
5 application control what's displayed?

6 MR. CLEMENTS: Objection. Scope.

7 A I mean we're kind of getting -- so I --
8 I understand, by the way, that the use -- that the
9 word "control" is used throughout the claims,
10 so -- you know, and those are to be read in the
11 context of the specification by a POSITA at the
12 time of the invention as well as the prosecution
13 history.

14 But I mean this hypothetical, as I
15 understand, has really no context except computer
16 science, so I'm like any -- I -- none of the --
17 I'm not really thinking about any meanings of any
18 words here with respect to the challenged patent.

19 But, you know, when you run that
20 program, you know the program isn't -- the program
21 gets compiled -- first of all, it gets compiled.
22 Not all programs get compiled; some get

1 interpreted.

2 But the compilation or interpretation of
3 these programs involves a large number of steps,
4 and it's -- you know, you have to understand the
5 various tokens and symbols in the program. You
6 have to parse them to get those tokens, you have
7 to examine the grammar of the language, you may
8 have to know like what other libraries are used,
9 you know, and in the end, there are instructions
10 generated that execute and produce an output that
11 a programmer would expect when they wrote their
12 code.

13 So, you know, in that sense of can the
14 programmer specify what's going to later be shown,
15 they absolutely can, they can write the program
16 however they want. So if your meaning of
17 "control" is that, then the programmer is
18 controlling the output in that sense.

19 Again, in this general context where I'm
20 really not -- not focusing on any claim terms here
21 or the context of the specification.

22 Q Right.

1 So you said the programmer controls the
2 output, but I was asking about the application
3 itself. Does the application control the output?

4 A Well --

5 MR. CLEMENTS: Objection. Scope.

6 A Well, the programmer is going to write
7 it, and then -- and then it's going to get
8 compiled, and it's going to get executed by the
9 environment, you know, whatever it is.

10 So in that sense it's just doing what
11 it's told in that sense, and it's not creative in
12 the sense that it can change itself, at least, you
13 know, at the time of the invention.

14 You know, programs -- well, I mean there
15 might have been some research and self-modifying
16 programs, I suppose, but if the coder didn't write
17 it that way, the sense of who was controlling
18 output, it's really -- in that sense, it's -- the
19 programmer is deciding what's done and the
20 application just does what's done -- what's
21 specified by the code.

22 So I think it depends on what you mean

1 by "control" and in what context.

2 Q Okay. And then one question -- I forgot
3 to ask this question earlier when we were talking
4 about HTML and email, so is HTML a standard --
5 sorry. At the time of the invention, was HTML a
6 standard email format?

7 A So at the time of invention my
8 understanding is -- I can't recall that specific
9 question, but there were different web app --
10 sorry, mail applications, both stand-alone
11 applications and web mail-type applications, that
12 as I understood did support the rendering of rich
13 email messages, mostly through the use of HTML
14 code.

15 And Microsoft I think produced such code
16 libraries, you know, in the mid-'90s when they
17 started introducing Internet Explorer so that
18 programmers incorporate web -- you know, HTML
19 document rendering within their apps, whether they
20 be emails or otherwise.

21 So with respect to the standard issue,
22 I'm not aware of a specific standard, but because

1 many people actually implemented HTML presentation
2 of email that could be embedded within the email
3 message, it may have been described as a
4 de facto standard.

5 MR. HIGGINS: And I would actually like
6 to take a break for lunch, Dr. Houh, and I'm still
7 going to try to be done before four o'clock. I
8 was thinking maybe, if you're okay with it, we
9 could break here for half an hour, if that's
10 acceptable.

11 THE WITNESS: Yeah, that's fine.

12 MR. HIGGINS: Okay.

13 (A recess was taken at 4:41 p.m.)

14 (Back on the record at 5:11 p.m.)

15 BY MR. HIGGINS:

16 Q So, Dr. Houh, I'd like to direct your
17 attention to some of the portions of the
18 Rothschild reference that we've been talking about
19 before, and I'm going to start at column 9 of the
20 Rothschild '211 patent, and more specifically in
21 column 9, line 26, talks about the pull-down menu.

22 A Okay.

1 Q So is it the case in Rothschild that
2 this pull-down menu 404 is going to show ads that
3 are from a sender-created palette of
4 advertisements?

5 A I mean it says right here in column 9,
6 around line 29, that the pull-down menu 404 gives
7 the sender the ability to choose an advertisement
8 from a sender-created palette of advertisements.

9 Q And if I'm reading that same column 9,
10 lines 31 to 32 correctly, it looks to me that the
11 sender generates this palette of advertisements,
12 and that discussion continues saying that the
13 palette contains advertisements that the sender
14 has previously selected.

15 Am I reading that correctly, Dr. Houh?

16 A (Reviewing.)

17 Well, it does go on to say at line 32
18 that each sender is allowed to generate an
19 individual palette of advertisement stored on the
20 Web site memory device 116 (see FIG 2). The
21 palette contains advertisements that the sender
22 has previously selected. The sender may have the

1 option of adding additional advertisements to the
2 palette and removing advertisements from the
3 palette, and it goes on.

4 I think it says that the advertisers can
5 actually remove like expired ads as well, but -- I
6 mean it says what it says. I'm not denying that.

7 Q And then when the user is presented with
8 the pull-down menu 404 in the message composition
9 part of Rothschild, when the user picks an ad from
10 this drop-down -- from the pull-down menu 404,
11 does that qualify as the user selecting an
12 advertisement?

13 A (Reviewing.)

14 I mean down at line 50 it says here --
15 it says here:

16 The sender has the option, through the
17 pull-down menu 404, to select an advertisement to
18 accompany the email, select that no advertisement
19 is to accompany the email, or select that an
20 advertisement should be randomly selected, either
21 from the sender's palette or from the available
22 advertisements, to accompany the email.

1 So what -- it's saying one of the things
2 the user could do is select one of the
3 advertisements through the pull-down menu.

4 Q And why would picking one of the ads
5 from the pull-down menu 404 qualify as selecting
6 an advertisement?

7 A Are you talking with respect to the
8 claims language, something I said in my
9 Declaration?

10 Q I just meant in general. You certainly
11 refer to this in your Declaration, but I'm just
12 talking generally.

13 So if you pick something from a
14 pull-down menu, picking the ad from the pull-down
15 menu qualifies as selecting an ad, and I was just
16 hoping you could explain why.

17 A I guess I don't understand what the
18 issue is, because it literally says here that the
19 user has the option, through the pull-down menu,
20 to select an advertisement to accompany the email.

21 Are you asking me what process the user
22 does to do that? To make that selection?

1 Q Yeah, well -- actually, I want to talk
2 about the process in a moment, but I was just --
3 yeah, let's talk about -- let's talk about the
4 process, but a different aspect of that.

5 So when the user selects an ad from the
6 drop-down menu, what happens next?

7 A (Reviewing.)

8 So when the advertisement is selected,
9 you know, what would be happening is that the
10 server -- like what I say here is that the
11 server -- and look at paragraph 46.

12 Q Oh, sorry, sorry to interrupt, paragraph
13 46 of your Declaration?

14 A Yes.

15 Q Okay.

16 A When the user selects an advertisement,
17 Rothschild's server receives the compilation of
18 data which include message data, sender data, and
19 advertisement data, and when the server receives
20 the user's advertisement selection, Rothschild's
21 server determines an action to be performed by
22 placing the selected interactive advertisement -

1 along with its embedded URL - into the email
2 message.

3 And so that whatever the user selected
4 would then be inserted into the draft message, as
5 seen in the example -- Figure 4 is an example
6 interface for this.

7 Q So I'm going to turn back to column 9 of
8 the Rothschild patent, the same place we were
9 before when I asked the question, just to make
10 sure we're on the same page.

11 Does the selection of the ad from the
12 drop-down menu cause the data to be sent to the
13 server?

14 And let me point you to the next
15 paragraph in column 9, line 57, there's this
16 discussion saying:

17 At this point, the sender can depress
18 the send message button 414 to send the email, for
19 example.

20 So you can have that in mind while you
21 answer the question. But I'm just -- to make it
22 more clear, the question I'm asking is, if the

1 user selects an ad from the drop-down menu, does
2 that cause the ad to be sent to the server in
3 Rothschild?

4 A No, that's not what I'm saying. What
5 I'm saying here is that the ad needs to be
6 inserted. And what we have is just the drop-down
7 menu which, as I said, identifies an ad, and that
8 information would be used by the server to
9 retrieve the ad to send back to the client to
10 insert the ad, because the server has knowledge of
11 the details.

12 And then as the user is composing the
13 rest of the message, they can hit "Send," in which
14 case the message would be posted to the server
15 again -- or the whole message that is ready to
16 send in ready-to-send format, and that's what it's
17 talking about, you know, starting at line 57 in
18 Rothschild of column 9.

19 And so -- but in order to actually place
20 the ad, you know, into the message, the server
21 would receive the ID selected by the drop-down and
22 then post -- or reply with -- one way it can be

1 done is the server would then reply with the
2 actual selected ad as by the ID or other
3 identifier in the drop-down menu, and then the
4 message be -- that fragment would be inserted, and
5 then the user can compose other things, or even
6 delete -- you know, it's just an email. It --
7 disclosing kind of the basic email editor of the
8 day.

9 So that's how the actual text of the --
10 or the code of the hotlink, in whatever form,
11 including in the HTML form, as exemplified in my
12 Declaration, would end up in that message box 410.

13 Q So if I'm understanding what you said
14 correctly, you're saying when the user selects --
15 in Rothschild when the user selects an ad from the
16 pull-down menu 404, that selection by itself,
17 without any other selection or pressing the "Send"
18 button, sends the selected ad or an ID for the ad
19 to the Rothschild server?

20 A That was commonly done at the time
21 through -- as my understanding. A POSITA would
22 have known how to do that, and so that's what I'm

1 describing as part of what's disclosed in
2 Rothschild.

3 Q But does Rothschild itself state that
4 that happens, or are you instead saying that it
5 could -- it's happened that way instead of what
6 Rothschild expressly states?

7 A Well, I mean, Rothschild does say that
8 the sender can depress "Send" on the email
9 (indiscernible), but at that point that's sending
10 a fully composed message.

11 So in order to fully compose the
12 message, you need to have the text or the code
13 behind the message behind the hotlink, or the
14 interactive advertisement of Rothschild.

15 So it goes there because it's -- it's
16 just what -- a POSITA would know how to use HTML
17 and other techniques available at the time to do
18 that. And that type of asynchronous posting was
19 available and usable by users.

20 Q So let me point you to column 4 of
21 Rothschild and, more specifically, column 4, line
22 33, and I'll give you a moment to get there.

1 A Okay.

2 Q So that passage, start at column 4, line
3 33 of Rothschild, and continuing down several
4 lines -- you can read it for yourself -- so I'm
5 not going to pretend that I'm reading everything
6 verbatim correctly, but just to paraphrase, it
7 talks about the sender has an opportunity to enter
8 message data and also select an advertisement, and
9 then mentions that you could choose -- the sender
10 could choose the advertisement from the palette of
11 advertisements, and then at line 40 of column 4,
12 Rothschild states:

13 When the sender indicates that the
14 message is ready to be sent, the advertising
15 application is presented with message data
16 pertaining to the communication and that has
17 sender data and advertisement data.

18 Do you see that portion?

19 A Yes.

20 Q So I see Rothschild saying that when the
21 sender indicates the message is ready to be sent,
22 then the advertising application gets the

1 advertisement data. So I wanted you to have that
2 quote in mind.

3 What, if anything, is your basis for
4 saying that in Rothschild, before the sender
5 indicates that the message is ready to be sent,
6 the server in Rothschild -- or the advertising
7 application or anything else receives the ad that
8 the user selected from the drop-down menu?

9 A Well, that's entirely consistent with
10 this passage, then, looking at here. You know,
11 if -- there are many ways to insert data. There's
12 this random ad, which is a button to post.

13 As I said earlier, I think, you know,
14 once the selection is made, the user could have
15 pressed the button that said "Insert this ad" or
16 something, and if that ad's going to be inserted,
17 something's going to show up in the message, and
18 that's consistent with this passage, that what
19 shows up -- for example, the code fragment would
20 include advertisement data as stated here.

21 And then that message could be then, you
22 know, as a whole, submitted for sending when the

1 user completes the -- you know, composing their
2 entire message.

3 It's just like you can have a draft, you
4 don't have to send it, but when you hit "Send,"
5 the data will be received by the server.

6 And, you know, there's fancy tricks,
7 like you can actually continuously post updates,
8 but regardless, the data is still received by the
9 server at some point. If not, when you hit "Send"
10 sometime earlier, it's doing something fancy, but
11 it's certainly going to be received by the system
12 because that's how you send the message.

13 Q Okay.

14 A If you don't send the message, the
15 system won't send the message that you composed.

16 Q Can you point me to any particular part
17 of Rothschild where it expressly says that the
18 server receives the user's selection from the
19 pull-down menu before the sender hits the "Send"
20 button?

21 A (Reviewing.)

22 So the spec of Rothschild does talk

1 about the way this -- to send a personal
2 communication. If you look at column 4, line 27:

3 To send a personal communication
4 containing a sender-selected advertisement, the
5 sender network device communicates with the
6 advertising application operating on the Web site.

7 So that's describing what's required to
8 do this. And so I think I described this is a way
9 that a person of ordinary skill would have known
10 to do that.

11 But regardless of how -- of that example
12 I gave, my point is that the server still is
13 certifying an identification of the advertisement.
14 It has to. Otherwise, it wouldn't know what ad to
15 select and insert in the message, because the
16 messages do contain a user-selected advertisement.

17 So as I've explained here in 46, when
18 the user selects an advertisement, Rothschild's
19 server receives the compilation of data, which
20 include message data, sender data, and
21 advertisement data.

22 And that's just an example I gave you of

1 the way a POSITA would know how to do that. And
2 if you didn't send any advertisement data, the
3 server wouldn't know what selected advertiser --
4 advertisement to send out with the message.

5 And it could be done in the way I
6 described, and certainly it's done through
7 communication with the server.

8 Q So that wasn't quite my question, but
9 let me -- let's just look at what you just
10 referred to.

11 You talked about the server getting all
12 three pieces, the sender, message, and advertising
13 data, and that's in your Declaration paragraph 46.

14 And you use the term "when," and so even
15 in your example, the server is getting all three
16 pieces at once, right?

17 A In that example, when it gets that, it
18 then can send a message, but it clearly has to
19 include the identified advertisement. That was
20 just one example.

21 At the very end, after we fully compose
22 the message, as I just talked about earlier,

1 getting sent also includes all that to be
2 submitted as the message to send out.

3 And so that's what I'm discussing here
4 as well, which is that when the user finally
5 receives the completed message to send -- sorry,
6 when the server -- when the user hits "Send" and
7 the server finally receives all this data as well,
8 that -- it receives the message, which includes
9 data about the advertisement the user selected,
10 and that's what I'm talking about here in 46 and
11 in later sections as well.

12 Q Yeah, and I think I understand that,
13 although my question was different than that. But
14 let me just let you know that I heard you.

15 So I'm hearing that you're saying that
16 the server will eventually receive advertising,
17 the advertisement that was selected, and I'm not
18 asking you does the server never receive the
19 selected ad, I'm asking a different question.

20 So I understand that the server can
21 receive three pieces, the sender data, message
22 data, and ad, and that it will receive that at

1 some point, and I also understand that the user
2 can select the ad from the drop-down menu.

3 My question to you is, is there any
4 express statement that you can point us to in
5 Rothschild where the server receives the selected
6 ad or information about the selected ad before the
7 user presses the "Send" button?

8 A Well, as I said, there are examples of
9 that case that can happen, that when the user
10 sends the message -- when the user selects the
11 advertisement and sends the message, as we also
12 saw in the column you were directing me to
13 earlier, it's going to receive all this data,
14 including an identification ad, in whatever form
15 it happens to be in, so that the message can go
16 out with the user-selected ad.

17 So what I'm really relying on here in my
18 Declaration in paragraph 46 is when the user
19 selects an ad, these things happen, and the server
20 receives these.

21 And really, you know, they chose the ad
22 and when they hit "Send" in that case, the

1 Rothschild server is now receiving -- receives the
2 compilation of data, which includes message data,
3 sender data, and advertisement data.

4 I mean that's what I'm pointing to here
5 in my Declaration.

6 Q And so, just to be clear, then, you're
7 not relying on any concept of Rothschild's server
8 receiving the selected ad before the user presses
9 the "Send" button; is that right?

10 A Well, I mean I'm saying that's an
11 example of how it could be done, is doing that.
12 But certainly, you know, at the point the
13 Rothschild server receives the message, it's
14 also -- regardless of what happened earlier, it's
15 also receiving the advertisement data with respect
16 to the one selected. Otherwise, it couldn't
17 compose the message with the user-selected ad.

18 And so, you know, that's -- I mean my
19 report is my report. I gave a few examples of
20 things -- the way things could be done using the
21 technology, but I mean it's certainly still
22 receiving the advertisement data at the time the

1 user selects to send a message that's already
2 composed. Otherwise, the server wouldn't be able
3 to insert the advertisement or interact with the
4 advertisement in the message if it didn't know
5 what the message was. And I just simply gave you
6 an example of one way that it could be done.

7 Q Right. So I understand the example of
8 the server receiving all three pieces, the sender,
9 message, and ad after the sender presses the
10 "Send" button, and so I hear you loud and clear on
11 that point.

12 I was asking about a different concept,
13 related, but different, which is when the user
14 selects an ad from the drop-down menu -- and
15 let's -- just in this hypothetical let's make it
16 easy.

17 The user hasn't done anything else,
18 hasn't typed anything in the message body, the
19 user is not ready to send anything. The first
20 thing the user does is select an ad from the
21 drop-down menu.

22 Can you point us to anything -- or in

1 that scenario where all the user has done was
2 select an ad from the drop-down menu?

3 Are you saying that there's any
4 disclosure in Rothschild of sending that selected
5 ad to the server before the user hits the "Send"
6 button?

7 A You know, I was looking for that, and I
8 didn't specifically see that in my review right
9 now. But as I said, that was -- that's a way that
10 it could be done using the technology at the time.

11 You know, for example, if there were a
12 "insert ad," you know -- there's a "choose random
13 ad," it could also be a button that just says
14 "insert the ad." But regardless of how it's done
15 at that time, when the user hits "Send," the
16 server does receive the whole message and the
17 select -- information about the selected ad.

18 And so when that's the case, as I say in
19 46, the server has -- when the user -- when the
20 server receives the user's advertising selection,
21 for example, at that time, that is the detection
22 of the trigger, because that was -- you know,

1 there were two identification of whatever, as we
2 discussed earlier, they both apply to the
3 detection of the trigger, and one was identifying
4 the -- I forget what the language was. One was
5 identified when the server, you know, provides the
6 drop-down list. Provides the user's device with
7 the page that has the drop-down list, and the
8 other was also when the server received the --
9 received the advertisement data representing the
10 user selection.

11 MR. HIGGINS: Dr. Houh, thank you, I
12 have no further questions.

13 MR. CLEMENTS: Why don't we take a
14 five-minute break, and I'll review my notes and
15 see if I need to do any Redirect.

16 MR. HIGGINS: Certainly.

17 THE WITNESS: Thank you.

18 (A recess was taken at 5:51 p.m.)

19 (Back on the record at 5:55 p.m.)

20 MR. CLEMENTS: I have no further
21 questions.

22 Henry, I just said I don't have any

1 further questions, so no need to do any Redirect.

2 THE WITNESS: Thank you, everyone. Have
3 a great weekend.

4 (Off the record at 5:57 p.m.)
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1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Dawn M. Hart, Certified Reporter and
3 Notary Public within and for the State of
4 Maryland do hereby certify:

5 That Henry H. Houh, Ph.D., the witness whose
6 deposition is hereinbefore set forth, was duly
7 sworn by me before the commencement of such
8 deposition and that such deposition was taken
9 before me and is a true record of the testimony
10 given by such witness.

11 I further certify that the adverse party,
12 Google LLC, was represented by counsel at the
13 deposition.

14 I further certify that the deposition of
15 Henry H. Houh, Ph.D., occurred remotely on Friday,
16 August 18, 2023, commencing at 12:06 p.m. to
17 5:57 p.m.

18 I further certify the inspection, reading
19 and signing of said deposition was not discussed
20 on the record.

21 I further certify that I am not related to
22 any of the parties to this action by blood or

1 marriage, I am not employed by or an attorney to
2 any of the parties to this action, and that I am
3 in no way interested, financially or otherwise, in
4 the outcome of this matter.

5 IN WITNESS WHEREOF, I have hereunto set my
6 hand this 24th day of August, 2023.

7 My commission expires:

8 January 2, 2025

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12 NOTARY PUBLIC IN AND FOR THE
13 STATE OF MARYLAND

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