

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

**GOOGLE LLC,
Petitioner,**

CERTIFIED COPY

v.

**WILDSEED MOBILE LLC,
Patent Owner.**

Case IPR2023-00247 (US Patent No. 10,869,169)

VIDEOCONFERENCE DEPOSITION OF

DR. SAM MALEK

INDIVIDUALLY AND ON BEHALF OF

WILDSEED MOBILE LLC

OCTOBER 31, 2023

Page 1 - 38

10:12 a.m. - 11:20 a.m. CST

REPORTED BY:

Tamara L. Houston

CA CSR No. 7244, RPR, CCRR No. 140

Job Number 129897

 **THE SULLIVAN GROUP
OF COURT REPORTERS**
SULLIVANCOURTREPORTERS.COM
PHONE 562.888.6488

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

**GOOGLE LLC,
Petitioner,**

CERTIFIED COPY

v.

**WILDSEED MOBILE LLC,
Patent Owner.**

Case IPR2023-00247 (US Patent No. 10,869,169)

VIDEOCONFERENCE DEPOSITION OF
DR. SAM MALEK
INDIVIDUALLY AND ON BEHALF OF
WILDSEED MOBILE LLC

OCTOBER 31, 2023

Page 1 - 38

10:12 a.m. - 11:20 a.m. CST

REPORTED BY:

Tamara L. Houston

CA CSR No. 7244, RPR, CCRR No. 140

Job Number 129897

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

REMOTE VIDEOCONFERENCE DEPOSITION OF DR. SAM
MALEK, taken on behalf of the Petitioner, commencing
from 10:12 a.m. to 11:20 a.m., Tuesday, October 31,
2023, before Tamara L. Houston, CSR No. 7244, CCRR, RPR.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCE OF COUNSEL:

On behalf of the Petitioner:

**HAYNES AND BOONE, LLP
BY: CALMANN J. CLEMENTS, ESQ.
2801 N. Harwood Street
Suite 2300
Dallas, Texas 75201
Calmann.Clements@haynesboone.com**

On behalf of the Patent Owner and Witness:

**KRAMER ALBERTI LIM & TONKOVICH LLP
BY: ZACK HIGGINS, ESQ.
577 Airport Boulevard
Suite 250
Burlingame, California 94010
zhiggins@krameralberti.com**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX TO EXAMINATION

WITNESS:

EXAMINATIONS	PAGE
Mr. Clements.....	6

QUESTIONS INSTRUCTED NOT TO ANSWER

Page Line

None

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX TO EXHIBITS		
DR. SAM MALEK		
GOOGLE vs. WILDSEED MOBILE LLC		
OCTOBER 31, 2023		
Tamara L. Houston, CSR No. 7244, CRR No. 140, RPR.		
EXHIBIT	DESCRIPTION	PAGE
	None marked.	
	--000--	

1 TUESDAY, OCTOBER 31, 2023, 10:12 a.m.
2 --o0o--
3 All counsel present stipulate
4 that the witness shall be sworn remotely
5 by the court reporter
6 * * *
7 Whereupon, DR. SAM MALEK, having been
8 called as a witness was duly sworn
9 to tell the truth, the whole truth,
10 and nothing but the truth testified
11 as follows:
12 --o0o--
13 EXAMINATION BY MR. CLEMENTS:
14 Q. Good morning, Dr. Malek.
15 A. Good morning.
16 Q. Could you please state your full name for the
17 record?
18 A. My first name is Sam, S-A-M. My last name is
19 Malek, M-A-L-E-K.
20 Q. And you've been deposed before, correct?
21 A. Yes.
22 Q. How many times?
23 A. Probably close to 50 times.
24 Q. So you generally know how depositions work; is
25 that correct?

1 A. Yes.

2 Q. And you know that you must provide verbal
3 answers to my questions so that the court reporter can
4 make an accurate transcript, correct?

5 A. Yes.

6 Q. So because we're forming a record here, it's
7 important that we don't talk over each other. So if you
8 let me finish my question, I'll let you finish your
9 answers. Agreed?

10 A. Yes.

11 Q. And you understand that your counsel might
12 object to a question, but you still must provide an
13 answer to that question unless instructed otherwise,
14 correct?

15 A. Yes.

16 Q. And if you're confused as to a question that I
17 ask, please let me know so that I can perhaps ask it in
18 a different way.

19 Can we agree on that?

20 A. Yes.

21 Q. So you're connecting to the deposition today
22 on a personal computer, correct?

23 A. Yes, my work computer. My laptop.

24 Q. And aside from Zoom, are there any other
25 applications running on your computer today?

1 A. I have my -- I have a PDF -- I have the
2 Acrobat PDF with the documents in this case loaded in
3 it.
4 Q. Any Web pages or messaging programs?
5 A. No -- sorry. Let me actually just close -- I
6 did have my -- couple messaging programs.
7 I just closed them now. I'm out.
8 Q. Do you have any other electronic devices with
9 you in the room?
10 A. I have my mobile device here, yes.
11 Q. Is it turned off?
12 A. It's not turned off.
13 Q. Are there any other people in the room with
14 you today?
15 A. No.
16 Q. Do you have any handwritten notes with you
17 today?
18 A. No.
19 Q. Is there any reason that you can't provide a
20 full and accurate testimony today?
21 A. No.
22 Q. And you understand that the testimony you are
23 providing today will be used in inter partes review
24 proceeding IPR 2023-00247, correct?
25 A. Yes.

1 Q. And this IPR concerns U.S. Patent 10,869,169,
2 correct?

3 A. Yes.

4 Q. So if I say "the '169 patent," you'll
5 understand that to be referring to U.S. Patent
6 10,869,169, correct?

7 A. Yes.

8 Q. How many IPRs have you worked on?

9 A. In the past? I haven't counted. I'm
10 estimating maybe around ten.

11 Q. And just for some other definitions today, if
12 I use the acronym "POSITA," will you understand that to
13 mean a person of ordinary skill in the art in 2001,
14 which is the earliest alleged priority date of the
15 '169 patent?

16 A. Yes.

17 Q. And when I say "your declaration," you will
18 understand that I'm referring to Exhibit 2009 filed in
19 this IPR, correct?

20 A. Yes.

21 Q. And if I say "this IPR," you'll understand
22 that to mean inter partes review proceeding
23 IPR 2023-00247, correct?

24 A. Sorry, can you repeat that?

25 Q. So if I say "this IPR," you'll understand that

1 to mean inter partes review proceeding IPR 2023-00247,
2 right?

3 A. Yes. Yes.

4 Q. Have you provided expert consulting services
5 for Wildseed Mobile prior to this case?

6 A. No.

7 Q. Have you been retained by the law firm --

8 A. Sorry. Let me clarify.

9 So this -- I was retained before the IPRs were
10 filed, but I think I was retained on the district case.
11 And so I'm also working on the IPR case, but I haven't
12 worked with Wildseed Mobile before this -- this
13 litigation, including the IPR.

14 Q. Have you been retained by the law firm of
15 Kramer Alberti prior to this case?

16 A. Yes.

17 Q. When did you begin working on this matter for
18 Wildseed?

19 A. I don't remember the exact date, but I would
20 say maybe beginning of -- either beginning of this year
21 or late last year. I can look at my invoices. I don't
22 remember exactly right now.

23 Q. And who wrote your declaration for this IPR?

24 A. I drafted it, and I received help from
25 counsel.

1 Q. Who came up with the positions in your
2 declaration?

3 A. Those are all my positions.

4 Q. Approximately how long did you spend preparing
5 your declaration?

6 A. I spent -- I don't know the exact number of
7 hours, but I'm estimating over 100 hours.

8 Q. And what did you review in preparation for
9 your deposition today?

10 A. I reviewed my report and the various exhibits;
11 the various, you know, references; prior arts, for
12 example, Rothschild; and, you know, the patent itself;
13 and Dr. Houh's declaration.

14 Q. Are there any errors in your declaration that
15 you're aware of?

16 A. There -- I mean, they're not -- they're not in
17 any way serious errors.

18 But, for example, I noticed that, if you look
19 at the Table of Contents on page 1, just when I was
20 creating the document, the headings are a little weird
21 in the sense that, the first subheading on there,
22 heading 8, starts with C instead of starting with A.

23 So just some of the heading, numbering, and
24 things like that. I think that's the main one that I
25 see here. But I don't -- I don't have any corrections

1 to the -- sort of the meat of the report. It's just the
2 headings are a little off.

3 Q. Do you still stand by all of the opinions that
4 you've provided in your declaration?

5 A. Yes.

6 Q. Let's turn to some substantive discussions.
7 I'd like to start with your declaration, which is
8 Exhibit 2009. Putting that into the chat right now.

9 Let me know when you have that up and ready.

10 RPR.

11 BY MR. CLEMENTS

12 Q. Just let me know when you have that document
13 up.

14 A. I have that.

15 Q. So let's turn to paragraph 46.

16 Let me know when you're there.

17 A. I also have the -- maybe I should mention. I
18 have the printed copy of my report and some of the
19 references. There's nothing in them. They're just
20 clean copies.

21 Is it okay if I also just use the printed
22 copy?

23 Q. Yes. If you prefer to use the printed copy,
24 go ahead and do that.

25 A. Okay. So paragraph 46?

1 Q. That's correct.

2 A. Okay.

3 Q. So you say there that, "Claims 1 and 10 each
4 require generating a hot link during the message
5 creation process."

6 What is the message creation process you are
7 referring to?

8 A. So if you look at the claim language, it -- it
9 describes -- there's a limitation that says, "Generate a
10 hot link message."

11 So the claim discusses the generation of this
12 message. And as part of that, you know, as part of that
13 process, you are generating this hot link as well.

14 Q. So you referred to Claim 1. When you say "the
15 message creation process," are you referring to that
16 clause near the bottom of the claim that says, "Generate
17 a hot link message"?

18 A. Yeah. So that -- that -- that limitation
19 requires generating a hot link message.

20 Q. So when you say "the message creation
21 process," which step or steps in Claim 1 are the message
22 creation process?

23 A. So that's that we just talked about is
24 describing generating a hot link message.

25 Q. So when you say "message creation process,"

1 you're referring to that step there and only that step,
2 "generate a hot link message"; is that a correct
3 understanding?

4 A. I mean, as far as the claim goes, yes, that's
5 the part that talks about generating a hot link message.

6 Q. So earlier in the claim where it says,
7 "Identify a trigger to generate a hot link," that is not
8 part of the message creation process you refer to here;
9 is that right?

10 A. Sorry. What is the question?

11 Q. So earlier in the claim where it recites,
12 "Identify a trigger to generate a hot link," you're
13 saying that that is not part of the message creation
14 process you're referring to; is that correct?

15 A. So, I mean, what I'm saying is what I state
16 here. So the claim requires generating a hot link
17 during the message creation process, and that's what the
18 claim as a whole conveys.

19 Q. And you said earlier that that "generate a hot
20 link message" is what you're referring to for the
21 message creation process.

22 So are you saying that each of the limitations
23 in the claim are the message creation process or just
24 that clause there that says "generate a hot link
25 message"?

1 MR. HIGGINS: Object to form.

2 THE WITNESS: Yeah, I don't really follow what
3 you're asking me.

4 So I think the claim speaks for itself. It
5 discusses generating a hot link message as -- as -- you
6 know, that's sort of the -- that's what the mission is
7 is that you're generating these hot link messages, and
8 there's additional limitations that go with that.

9 BY MR. CLEMENTS:

10 Q. So you're saying that the steps about
11 identifying a trigger to generate a hot link goes with
12 the limitation of generating a hot link message; is that
13 right?

14 A. Well, the --

15 MR. HIGGINS: Object to form.

16 THE WITNESS: I mean, the hot link is included
17 in that message, so -- so the -- so the claim is about
18 generating this hot link message that includes the link.

19 BY MR. CLEMENTS:

20 Q. And going back to your statement in
21 paragraph 46 where you say, "Claims 1 and 10 each
22 require generating a hot link during the message
23 creation process," what in the claim language requires
24 that the hot link is generated during the message
25 creation process?

1 A. I mean, I think, on this point, Dr. Houh and I
2 are actually consistent. I mean, he's also pointing
3 to -- I mean, his understanding of this is also that
4 the -- you know, that this is happening in the context
5 of generating a hot link message. And that's what he's
6 pointing to in his declaration as well.

7 Q. So my question is: What in the claim language
8 requires the generation of the hot link to be during the
9 message creation process?

10 A. I mean, the claim says, "Identify a trigger to
11 generate the hot link." And in response to the
12 detection of the trigger, you go on to generate the hot
13 link message.

14 So, I mean, I believe the claim is discussing
15 the generation of the hot link as part of the -- you
16 know, the generation of the hot link message because
17 that's what the -- the claim language seems to suggest
18 that.

19 Q. And when you use the term "message" in the
20 phrase "message creation process," are you referring to
21 the hot link message?

22 A. Yes, so this would be the creation of the hot
23 link message.

24 Q. And can you point me to the areas of the
25 '169 patent specification where it describes this

1 message creation process?

2 A. So, for example, Figure 13 describes -- the
3 figure says, "Illustrative process for generating hot
4 link message for device in accordance with aspects of
5 the invention."

6 And so Figure 13 is describing sort of the
7 process of generating the message.

8 That's one aspect of it. I think there are
9 other disclosures in the patent that describe the
10 process.

11 Q. Would the steps in Figure 10 be included in
12 the message creation process?

13 And since we're talking about Exhibit 1001, I
14 will go ahead and put that in the chat.

15 A. I mean, that's what the title of the figure
16 is. So in Column 3, when the -- you know, in column 3,
17 the title, Figure 13, or how it's described is it
18 illustrates a process for generating a hot link message
19 for a device.

20 Q. Would the steps in Figure 12 be included in
21 the message creation process you refer to?

22 A. So, I mean, the aspects of it could, but I
23 think this is more specifically talking about the
24 process for identifying devices to send the hot link
25 message.

1 But aspects of it could also link to message
2 creation, but I think this is more specifically -- the
3 diagram is describing some other aspect that they
4 mention.

5 Q. And Figure 7 of the '169 patent describe --
6 and the accompanying text describe a selecting process
7 that is done by the user.

8 Is that process, with respect to Figure 7,
9 part of the message creation process?

10 A. This is describing other aspects of the
11 invention, but parts of it could relate to message
12 creation process too.

13 Q. What parts of it do you think could relate to
14 the message creation process?

15 A. There are some dependent claims here that I
16 think this is more describing those aspects of the
17 invention but identifying sort of the entities that you
18 like to select to receive the message.

19 Q. So let's turn to column 12 of the '169 patent,
20 starting on line 6. It states, "Figure 7 illustrates an
21 exemplary display for selecting the action associated
22 with the hot link."

23 Would selecting the action associated with the
24 hot link be part of the message creation process?

25 A. So -- so this is dealing with the -- so this

1 is dealing with the -- I would say the creation of the
2 hot link. So how do you specify actions associated with
3 the hot link.

4 And what's important is to understand that
5 the -- the -- generating the message, so that limitation
6 generating the hot message itself, is -- as I say in my
7 report, "is an additional limitation of the claim and is
8 distinct from the requirement to generate the hot link
9 itself."

10 But -- but -- so I think just to clarify that
11 aspect that you mentioned.

12 Q. So you mentioned that there's a distinction
13 between generating the hot link message and then the act
14 of generating the hot link itself.

15 Let's turn to Claim 1. Can you tell me which
16 limitation in Claim 1 requires the program code to
17 generate a hot link?

18 A. So the limitation that we're talking about --
19 so it says, "Identify a trigger to generate the hot
20 link."

21 That's the limitation of generating the hot
22 link. And that's separate and distinct from generating
23 a hot link message.

24 Q. And then let's look at Claim 10. Which
25 limitation in Claim 10 requires the server to generate a

1 hot link?

2 A. So there is a limitation in here that says, "A
3 request to generate the hot link along with" -- and then
4 it goes on.

5 Q. So you're referring to that clause, "Receive
6 from a first-user device a request to generate a hot
7 link along with information of a set of second-user
8 devices to receive the hot link"?

9 Is that the clause you were referring to?

10 A. Yeah. I think that's the -- that's the
11 reference I was pointing to.

12 Q. Go ahead and switch topics.

13 Turn to paragraph 41 of your declaration.

14 A. Okay.

15 Q. It says -- it says there, "Rothschild teaches
16 sending email in RTF (Rich Text Format) but not HTML
17 format, with interactive ads included as attachments."

18 Can you explain what Rich Text Format is?

19 A. Sure.

20 So Rich Text Format is a format for -- for
21 text. And it's different from, for example, plain text
22 in the sense that it allows you to specify, you know,
23 formatting optionalities -- so, for example, some text
24 is bold or that -- you know, or some text is italics;
25 you know, font size of the text; things of that nature.

1 Q. Does RTF format allow you to place a picture?
2 A. It allows you to include -- it allows
3 include -- or in-line images.
4 Q. Could one place a hyperlink within an email
5 message that is in RTF format?
6 A. Sorry. I didn't follow the question. What is
7 that?
8 Q. Could one put a hyperlink into an email
9 message that is in an RTF format?
10 A. Could one put an email in a message that is in
11 RTF format? Is that what you're asking?
12 Q. No. I'm asking if -- can you put a hyperlink
13 in a message that is in RTF format?
14 A. If, by "hyperlink," you mean an extra tag from
15 HTML, then, no, because it's not HTML. You can't put
16 something like that in an RTF message. I mean, you
17 could put it, but it will be treated as text.
18 Q. In RTF format, is there any way to put a link
19 to, for example, a website?
20 A. You can type in a URL, if that's what you're
21 asking. You can include a URL in an RTF message or
22 text. But it won't be an extra tag that HTML uses to
23 anchor, you know, a URL with some specific image or
24 text, for example. It's not an extra tag, but you can
25 type in a URL in RTF.

1 Q. And if the URL is in the RTF, if the person
2 reading it clicks on it, will it go to that link, or is
3 it just text?

4 MR. HIGGINS: Object to scope.

5 THE WITNESS: Well, that depends on the
6 environment. It depends on the specific application or
7 system that you're talking about.

8 BY MR. CLEMENTS:

9 Q. Let's go ahead and switch topics again and go
10 to paragraph 133 of your declaration.

11 Let me know when you're there.

12 A. 133. Yes, I'm there.

13 Q. You say there that, "Petitioner ignores the
14 claim term 'control' and treats 'control transmission'
15 as if it means the same thing as 'transmit' without any
16 rationale."

17 Can you explain what you believe the term
18 "control" means here?

19 A. Sure.

20 I think basically what I'm saying is that
21 controlling transmission is not the same as transmission
22 itself, right? So the word "control" has a meaning. I
23 think it has a meaning in plain language, but it also
24 has a meaning in computer science.

25 And it generally means -- you know, at least

1 one way of thinking about it is that control typically
2 involves a decision to be made, that you allow something
3 to happen or you don't allow something to happen.

4 And so -- but, yeah, I mean, I think the
5 overall point here is that control and control
6 transmission must mean different things, and they do
7 mean different things in computer science.

8 Q. So does control mean have software to perform
9 the action?

10 A. Well, I wouldn't put it -- I wouldn't describe
11 it that way. I think what I -- I mean, it could be you
12 can have software that has control, and you can have
13 software that doesn't have control.

14 But, yeah, control could be implemented in
15 software.

16 Q. So would a POSITA understand that a server
17 that receives a packet has some sort of software to
18 control receipt of that packet?

19 A. So a system capable of receiving doesn't
20 necessarily mean that that system is controlling the
21 receipt, if that's what you're asking.

22 Q. So how could a server receive something but
23 not control receipt of it?

24 A. Because you have no control over whether it's
25 going to receive it or -- or drop it and not receive it.

1 Q. So you say in paragraph 134 that the
2 specification of the '169 patent mentions an operating
3 system and a BIOS.

4 Does the specification of the '169 patent
5 explain how either the operating system or the BIOS
6 controls receipt?

7 MR. HIGGINS: Object to scope.

8 THE WITNESS: What are you pointing to? I
9 missed --

10 BY MR. CLEMENTS:

11 Q. Yeah, in paragraph 134, you refer to an
12 operating system and a BIOS within that paragraph.

13 A. Mm-hmm.

14 Q. And so my question is: Does the specification
15 of the '169 patent explain how either the operating
16 system or BIOS controls receipt of a packet?

17 MR. HIGGINS: Object to scope.

18 THE WITNESS: I mean, I don't know. I would
19 have to read the patent. But I think this is something
20 that a POSA would understand anyways. So a POSA would
21 be familiar with operating systems and BIOSes and how
22 they operate.

23 BY MR. CLEMENTS:

24 Q. But the mere existence of an operating system
25 or a BIOS would lead a POSITA to understand how it

1 controls receipt?

2 MR. HIGGINS: Object to scope.

3 THE WITNESS: No. What I'm saying is that a
4 POSITA would know that operating systems have control
5 over -- over a system, and they would know the kinds of
6 control that operating system would have.

7 BY MR. CLEMENTS:

8 Q. Would a POSITA understand that Rothschild's
9 server has an operating system?

10 A. I don't follow that question.

11 So the server is the server, and an operating
12 system is an operating system. They are two different
13 things.

14 Q. Would a POSITA find it obvious for a server to
15 have an operating system?

16 A. Well, a server can have an operating system,
17 yes. But that doesn't mean that it has all the kinds of
18 controls that the patent requires.

19 Q. And would a POSITA have found it obvious for a
20 server to have a BIOS?

21 A. A server computer could have BIOS, but I don't
22 think it would necessarily meet all the limitations of
23 the claim.

24 Q. Let's turn back to paragraph 39 of your
25 declaration.

1 A. Okay.

2 Q. You say here that, "Rothschild discloses that
3 users create emails and insert advertisements into those
4 emails using a message-composition template."

5 Can you explain your understanding of how
6 Rothschild's system of creating emails and inserting
7 advertisement works?

8 And I can upload the Rothschild reference to
9 the chat.

10 A. Sure.

11 So if you look at -- I mean, an example of
12 that description would be on column 9 at line 11. It
13 says, "If the sender indicates a desire to send an email
14 to a recipient, he may be provided with an email
15 communication page 402 as shown in Figure 4."

16 And then -- then it goes on to later say, "The
17 email communication page 402 further provides" --

18 RPR.

19 THE WITNESS: -- "a pull-down menu 404 for
20 selecting an advertisement that is to be included within
21 the email."

22 BY MR. CLEMENTS:

23 Q. So when a user decides to create an email and
24 their system loads page 402, does their system generate
25 any data?

1 A. Sorry. Can you repeat the question?

2 Q. So when the user loads page 402, what data
3 would be generated?

4 A. Well, that's a broad question. I mean, so
5 Figure 4 is showing a Web page, and I would expect that,
6 when you load up this Web page, the data associated with
7 the Web page would be loaded.

8 Q. Would the data associated with the Web page be
9 generated by the user's system?

10 A. Yeah, I'm not sure how -- I would characterize
11 it like that. I would have to think more about it.

12 But I would say that the Web page would be --
13 would be loaded, so this would be the Web page that you
14 would receive from the server. And it would be loaded
15 into the browser.

16 Q. So the data would be downloaded from the
17 server and loaded into the systems -- the user system
18 memory and presented to the user; is that correct?

19 A. Yeah. The Web page would be loaded and
20 presented to the user.

21 Q. Does that involve any data being generated?

22 A. I don't think Rothschild goes into details of
23 how the -- what application works. I just -- you know,
24 so based on what I've reviewed, I don't think Rothschild
25 goes into those details.

1 I don't think, just sitting here, though,
2 without having had a chance to really think this
3 through, I -- and without the details, I don't think,
4 however, that loading a Web page would qualify as
5 generating something with the loading off the Web page.

6 Q. What about when the user decides to insert an
7 advertisement into the email? Would that involve the
8 generation of any data?

9 A. So can you clarify what you mean by inserting
10 advertisements? Can you clarify the question, maybe?

11 Q. Yeah.

12 So in column 9, starting on line 26, it says,
13 "The email communication page 402 further provides a
14 pull-down menu 404 for selecting the advertisement that
15 is to be included within the email."

16 So when the user selects an advertisement from
17 that pull-down menu, is any data generated?

18 A. So my understanding is that the -- in the case
19 of Rothschild, the advertisement -- whether it's static
20 or interactive -- are already made on -- already
21 previously made basically by the time they're actually
22 looking at this page.

23 The Rothschild doesn't disclose in detail what
24 really happens in terms of using this pull-down menu.
25 But what I think is clear is that, in the case of

1 Rothschild, when they are receiving advertisements that
2 are added to the ad palette, those are created on the
3 server.

4 And they are already interactive if they are
5 interactive, or they are static if they are static.

6 Q. So these advertisements which you say were
7 previously created, would they have to be copied from
8 somewhere?

9 A. I think they are -- my understanding is that
10 they are stored on the server, and they get sent to
11 the -- to the mobile device or just the regular desktop
12 computer.

13 Q. So is a copy of the advertisement ever made?

14 A. I don't think Rothschild discloses making
15 copies of these advertisements. But what it does
16 disclose is that these advertisements are added to an ad
17 palette for the user to select to include in their -- in
18 their messages.

19 Q. Would a person of ordinary skill in the art
20 understand that a copy is made of these advertisements
21 before sending them to a user?

22 A. No, I don't think -- I don't think it's
23 necessarily the case that you make a copy of
24 advertisements before you send them to a user.

25 Q. Would a person of ordinary skill in the art

1 understand that, when you retrieve the advertisement
2 from the database on the server and transmit it to a
3 user, that you're transmitting a copy of that
4 advertisement?

5 MR. HIGGINS: Going to object to scope.

6 THE WITNESS: I mean, I think a POSA would
7 understand that you're sending -- you're sending data.
8 You're sending a file. I don't think a POSA would
9 understand that as making a copy of it.

10 BY MR. CLEMENTS:

11 Q. But it would not be the case that, when the
12 server transmits the advertisement to the user, that the
13 advertisement ceases to exist on the database, correct?

14 MR. HIGGINS: Object to form and to scope.

15 THE WITNESS: I mean, are you talking about
16 any specific embodiments in Rothschild, or are you just
17 asking me in the abstract?

18 BY MR. CLEMENTS:

19 Q. I'm just asking your opinion as to what a
20 POSITA would understand.

21 A. Understand about what, though?

22 Q. Understand about, when the server sends the
23 advertisement to a user, is it sending a copy of the
24 advertisement, or is it just transferring it from the
25 server to the recipient, such that it no longer exists

1 on the server.

2 A. Well, I mean, I don't -- I don't think
3 Rothschild discloses the server deleting advertisements
4 from the server after sending it over. It doesn't
5 disclose that.

6 And I think a POA would understand that, you
7 know, sending a file means that you send a file from the
8 server to -- to a client, to a computer. And I think --

9 I'm talking here kind of in abstract,
10 actually, because I'm not really sure which one of the
11 embodiments of Rothschild you're talking about.

12 Q. So in Rothschild, when it sends a file to a
13 recipient, does it have to first generate that file for
14 sending to the user?

15 A. I don't really see why you'd have to generate
16 the file. The file already exists. So my understanding
17 is that these static or interactive ads already exist,
18 and you just provide them to the clients.

19 So an example would be some mobile -- in the
20 case of mobile embodiments, I have some discussions of
21 that in the context of Figure 11, for example, in my
22 report.

23 Q. So in paragraph 48 of your report, you say,
24 "Inserting a preexisting ad into a new message, for
25 example, does not generate an ad; instead, the ad

1 already existed."

2 So what is the basis -- what is your basis for
3 drawing this conclusion?

4 A. You read from paragraph 48?

5 Q. That's correct.

6 A. Sorry. What portion did you read? Is it the
7 last sentence?

8 Q. Yes, the last sentence. Or second to -- third
9 to last sentence, on the top of page 27, starting with,
10 "Inserting a preexisting ad."

11 A. Right.

12 And, sorry, what is your question about this?

13 Q. And my question is: What is your basis for
14 drawing this conclusion here?

15 A. Well, I mean, I think it's plain -- it's plain
16 English. Inserting a preexisting ad into a message does
17 not generate the ad because the ad already existed.

18 Q. So is your opinion based on your understanding
19 of what the term "generate" means?

20 A. Yeah. I mean, it's partly based on my
21 understanding of what "generate" means. If something
22 already exists, you're not generating it.

23 Q. So in your opinion, what does the word
24 "generate" mean with respect to Claims 1 and 10?

25 A. I mean, it's the plain and ordinary meaning of

1 the term. So generate would mean to create something
2 new that doesn't exist.

3 Q. Are you basing this opinion on something from
4 the specification of the '169 patent?

5 A. I think it's a plain and ordinary meaning of
6 that term to a POSA in light of the spec, yeah. That's
7 what it would mean.

8 Q. Is there a specific portion of the
9 specification you can point me to that you use to derive
10 your understanding of the word "generate"?

11 A. I mean, I would have to read the patents, if
12 you wanted to do that right now. But, I mean, I've read
13 the patent multiple times, and, you know, that's what is
14 my opinion is that that's what a POSA would have
15 understood based on their knowledge at the time and what
16 the patent describes.

17 Q. But is there a specific portion of the
18 '169 patent that -- that you relied on to -- for your
19 definition of the word "generate"?

20 A. Yeah. Let me -- let me look for that.

21 Now, I'm finding a lot of places where the
22 word "generate" is used, and it's always used in the
23 context of what I pretty much, I think, described.

24 So, for example, on column 17, line 29, it
25 says, "If special characters or strings are used to

1 indicate the type, then those characters are generated
2 and inserted into the message."

3 There is another place that I saw in the
4 patent where it talks about users providing their
5 preferences or their opinions by -- by clicking on some
6 buttons. And then so as a result of that, the users
7 specify -- or the system is generating, you know -- I
8 can find that, but it's generating basically opinions
9 about messages and so on.

10 So, I mean, it's used throughout the spec, and
11 it's used consistent with what I -- what I described.

12 Q. But there's no explicit definition in the
13 '169 patent as to the word "generate," correct?

14 A. I mean, I didn't find the word -- I didn't
15 find, like, explicit definition being provided in the
16 spec. But I think the way it's used is consistent with
17 how a POSA would understand it to mean, particularly in
18 the light of the spec.

19 MR. CLEMENTS: That's all the questions I have
20 for today. Thank you, Dr. Malek.

21 MR. HIGGINS: Thank you.

22 COURT REPORTER: Counsel, may I get transcript
23 requests on the record, please?

24 MR. CLEMENTS: Yes. At least send us the
25 transcript. I don't think we need it -- we don't need a

1 rushed transcript. Just -- just the standard practice.
2 What is your turnaround for the standard time?
3 COURT REPORTER: Ten days, business days.
4 MR. CLEMENTS: That will work for us.
5 MR. HIGGINS: Yeah. And that's fine for us as
6 well.
7 MR. CLEMENTS: Just to confirm, Zack, I take
8 it you don't have any questions for the witness as well?
9 MR. HIGGINS: Yes. Thanks for clarifying.
10 Thank you.
11 (Whereupon the proceedings concluded at
12 11:20 a.m.)
13
14
15
16
17
18
19
20
21
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ERRATA SHEET
NAME OF CASE: GOOGLE V. WILDSEED MOBILE LLC
DATE OF DEPOSITION: OCTOBER 31, 2023
NAME OF WITNESS: DR. SAM MALEK

Reason Codes:

- 1: To clarify the record.
- 2: To conform to the facts.
- 3: To correct transcription error.

Page	_____	Line	_____	Reason	_____
From	_____				to _____
Page	_____	Line	_____	Reason	_____
From	_____				to _____
Page	_____	Line	_____	Reason	_____
From	_____				to _____
Page	_____	Line	_____	Reason	_____
From	_____				to _____
Page	_____	Line	_____	Reason	_____
From	_____				to _____
Page	_____	Line	_____	Reason	_____
From	_____				to _____
Page	_____	Line	_____	Reason	_____
From	_____				to _____
Page	_____	Line	_____	Reason	_____
From	_____				to _____

_____	_____
DR. SAM MALEK	DATED

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

DECLARATION UNDER PENALTY OF PERJURY

I, DR. SAM MALEK, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on October 31, 2023; that I have made such corrections as appear noted on the Deposition Errata Page(s), attached hereto, signed by me; that my testimony as contained herein, as corrected, is true and correct.

This Declaration is executed this _____ day of _____, 20____, at _____, California.

DR. SAM MALEK

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

STATE OF CALIFORNIA)
) ss.
)

I, Tamara Houston, RPR, CCRR, CSR No. 7244, a
Certified Shorthand Reporter in the State of California,
duly empowered to administer oaths, do hereby certify:

That, prior to being examined, the witness
named in the foregoing deposition was by me duly sworn
to testify to the truth, the whole truth, and nothing
but the truth;

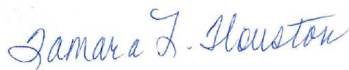
That said deposition was taken down by me in
shorthand at the time and place therein named, and
thereafter reduced to typewriting by computer-aided
transcription under my direction;

That the dismantling, unsealing, or unbinding of
the original transcript will render the reporter's
certification null and void.

I further certify that I am not interested in the
event of the action.

In witness whereof, I have hereunto subscribed my
name.

Dated: 14th of November, 2023.



TAMARA L. HOUSTON
CSR 7244, RPR, CCRR 140

--o0o-- 6:2,12 1 1 11:19 13:3,14,21 15:21 19:15,16 32:24 10 13:3 15:21 17:11 19:24, 25 32:24 10,869,169 9:1,6 100 11:7 1001 17:13 10:12 6:1 11 26:12 31:21 11:20 35:12 12 17:20 18:19 13 17:2,6,17 133 22:10,12 134 24:1,11 169 9:4,15 16:25 18:5,19 24:2,4,15 33:4,18 34:13 17 33:24 2 2001 9:13 2009 9:18 12:8 2023	6:1 2023-00247 8:24 9:23 10:1 26 28:12 27 32:9 29 33:24 3 3 17:16 31 6:1 39 25:24 4 4 26:15 27:5 402 26:15,17,24 27:2 28:13 404 26:19 28:14 41 20:13 46 12:15,25 15:21 48 31:23 32:4 5 50 6:23 6 6 18:20 7 7 18:5,8,20	8 8 11:22 9 9 26:12 28:12 A a.m. 6:1 35:12 abstract 30:17 31:9 accompanying 18:6 accordance 17:4 accurate 7:4 8:20 Acrobat 8:2 acronym 9:12 act 19:13 action 18:21,23 23:9 actions 19:2 ad 29:2,16 31:24,25 32:10, 16,17 added 29:2,16 additional 15:8 19:7 ads 20:17 31:17 advertisement 26:7,20 28:7,14,16,19 29:13 30:1,4,12,13,23, 24 advertisements	26:3 28:10 29:1,6,15, 16,20,24 31:3 agree 7:19 Agreed 7:9 ahead 12:24 17:14 20:12 22:9 Alberti 10:15 alleged 9:14 anchor 21:23 answers 7:3,9 application 22:6 27:23 applications 7:25 Approximately 11:4 areas 16:24 art 9:13 29:19,25 arts 11:11 aspect 17:8 18:3 19:11 aspects 17:4,22 18:1,10,16 attachments 20:17 aware 11:15 B back 15:20 25:24 based 27:24 32:18,20 33:15 basically 22:20 28:21 34:8
--	---	--	---

THE SULLIVAN GROUP OF COURT REPORTERS

Index: --o0o--basically

basing 33:3 basis 32:2,13 begin 10:17 beginning 10:20 BIOS 24:3,5,12,16,25 25:20, 21 BIOSSES 24:21 bold 20:24 bottom 13:16 broad 27:4 browser 27:15 business 35:3 buttons 34:6	claim 13:8,11,14,16,21 14:4, 6,11,16,18,23 15:4,17, 23 16:7,10,14,17 19:7, 15,16,24,25 22:14 25:23 claims 13:3 15:21 18:15 32:24 clarify 10:8 19:10 28:9,10 clarifying 35:9 clause 13:16 14:24 20:5,9 clean 12:20 clear 28:25 CLEMENTS 6:13 12:11 15:9,19 22:8 24:10,23 25:7 26:22 30:10,18 34:19,24 35:4, 7 clicking 34:5 clicks 22:2 client 31:8 clients 31:18 close 6:23 8:5 closed 8:7 code 19:16 column 17:16 18:19 26:12 28:12 33:24 communication 26:15,17 28:13 computer 7:22,23,25 22:24 23:7 25:21 29:12 31:8	concerns 9:1 concluded 35:11 conclusion 32:3,14 confirm 35:7 confused 7:16 connecting 7:21 consistent 16:2 34:11,16 consulting 10:4 Contents 11:19 context 16:4 31:21 33:23 control 22:14,18,22 23:1,5,8, 12,13,14,18,23,24 25:4, 6 controlling 22:21 23:20 controls 24:6,16 25:1,18 conveys 14:18 copied 29:7 copies 12:20 29:15 copy 12:18,22,23 29:13,20, 23 30:3,9,23 correct 6:20,25 7:4,14,22 8:24 9:2,6,19,23 13:1 14:2, 14 27:18 30:13 32:5 34:13 corrections 11:25 counsel	6:3 7:11 10:25 34:22 counted 9:9 couple 8:6 court 6:5 7:3 34:22 35:3 create 26:3,23 33:1 created 29:2,7 creating 11:20 26:6 creation 13:5,6,15,20,22,25 14:8,13,17,21,23 15:23, 25 16:9,20,22 17:1,12, 21 18:2,9,12,14,24 19:1
C			
called 6:8 capable 23:19 case 8:2 10:5,10,11,15 28:18,25 29:23 30:11 31:20 ceases 30:13 chance 28:2 characterize 27:10 characters 33:25 34:1 chat 12:8 17:14 26:9			
D			
			data 26:25 27:2,6,8,16,21 28:8,17 30:7 database 30:2,13 date 9:14 10:19 days 35:3 dealing 18:25 19:1 decides 26:23 28:6 decision 23:2 declaration 9:17 10:23 11:2,5,13,14 12:4,7 16:6 20:13 22:10 25:25 definition 33:19 34:12,15 definitions 9:11 deleting 31:3

THE SULLIVAN GROUP OF COURT REPORTERS

Index: basing–deleting

dependent 18:15	discussing 16:14	18:17	file 30:8 31:7,12,13,16	
depends 22:5,6	discussions 12:6 31:20	environment 22:6	filed 9:18 10:10	
deposed 6:20	display 18:21	errors 11:14,17	find 25:14 34:8,14,15	
deposition 7:21 11:9	distinct 19:8,22	estimating 9:10 11:7	finding 33:21	
depositions 6:24	distinction 19:12	exact 10:19 11:6	fine 35:5	
derive 33:9	district 10:10	EXAMINATION 6:13	finish 7:8	
describe 17:9 18:5,6 23:10	document 11:20 12:12	exemplary 18:21	firm 10:7,14	
describes 13:9 16:25 17:2 33:16	documents 8:2	Exhibit 9:18 12:8 17:13	first-user 20:6	
describing 13:24 17:6 18:3,10,16	downloaded 27:16	exhibits 11:10	follow 15:2 21:6 25:10	
description 26:12	drafted 10:24	exist 30:13 31:17 33:2	font 20:25	
desire 26:13	drawing 32:3,14	existed 32:1,17	form 15:1,15 30:14	
desktop 29:11	drop 23:25	existence 24:24	format 20:16,17,18,20 21:1,5,9,11,13,18	
detail 28:23	duly 6:8	exists 30:25 31:16 32:22	formatting 20:23	
details 27:22,25 28:3	E		forming 7:6	
detection 16:12	earlier 14:6,11,19	expert 10:4	found 25:19	
device 8:10 17:4,19 20:6 29:11	earliest 9:14	explain 20:18 22:17 24:5,15 26:5	full 6:16 8:20	
devices 8:8 17:24 20:8	electronic 8:8	explicit 34:12,15	G	
diagram 18:3	email THE SULLIVAN GROUP OF COURT REPORTERS 20:16 21:4,8,10 26:13,14,17,21,23 28:7,13,15	extra 21:14,22,24	generally 6:24 22:25	
disclose 28:23 29:16 31:5	emails 26:3,4,6	F		generate 13:9,16 14:2,7,12,19,24 15:11 16:11,12 19:8,17,19,25 20:3,6 26:24 31:13,15,25 32:17,19,21,24 33:1,10,19,22 34:13
discloses 26:2 29:14 31:3	embodiments 30:16 31:11,20	familiar 24:21		
disclosures 17:9	English 32:16	figure 17:2,3,6,11,15,17,20 18:5,8,20 26:15 27:5 31:21		
discusses 13:11 15:5	entities		generated	

THE SULLIVAN GROUP OF COURT REPORTERS

Index: dependent-generated

15:24 27:3,9,21 28:17 34:1		interactive 20:17 28:20 29:4,5 31:17	13:9,18 15:12 19:5,7, 16,18,21,25 20:2
generating 13:4,13,19,24 14:5,16 15:5,7,12,18,22 16:5 17:3,7,18 19:5,6,13,14, 21,22 28:5 32:22 34:7,8	I	invention 17:5 18:11,17	limitations 14:22 15:8 25:22
generation 13:11 16:8,15,16 28:8	Identify 14:7,12 16:10 19:19	invoices 10:21	link 13:4,10,13,17,19,24 14:2,5,7,12,16,20,24 15:5,7,11,12,16,18,22, 24 16:5,8,11,13,15,16, 21,23 17:4,18,24 18:1, 22,24 19:2,3,8,13,14, 17,20,22,23 20:1,3,7,8 21:18 22:2
Good 6:14,15	identifying 15:11 17:24 18:17	involve 27:21 28:7	litigation 10:13
H	ignores 22:13	involves 23:2	load 27:6
handwritten 8:16	illustrates 17:18 18:20	IPR 8:24 9:1,19,21,23,25 10:1,11,13,23	loaded 8:2 27:7,13,14,17,19
happen 23:3	Illustrative 17:3	IPRS 9:8 10:9	loading 28:4,5
happening 16:4	image 21:23	italics 20:24	loads 26:24 27:2
heading 11:22,23	images 21:3	K	long 11:4
headings 11:20 12:2	implemented 23:14	kind 31:9	longer 30:25
HIGGINS 15:1,15 22:4 24:7,17 25:2 30:5,14 34:21 35:5,9	important 7:7 19:4	kinds 25:5,17	lot 33:21
hot 13:4,10,13,17,19,24 14:2,5,7,12,16,19,24 15:5,7,11,12,16,18,22, 24 16:5,8,11,12,15,16, 21,22 17:3,18,24 18:22, 24 19:2,3,6,8,13,14,17, 19,21,23 20:1,3,6,8	in-line 21:3	knowledge 33:15	
Houh 16:1	include 21:2,3,21 29:17	Kramer 10:15	M
Houh's 11:13	included 15:16 17:11,20 20:17 26:20 28:15	L	M-A-L-E-K 6:19
hours 11:7	includes 15:18	language 13:8 15:23 16:7,17 22:23	made 23:2 28:20,21 29:13,20
HTML 20:16 21:15,22	including 10:13	laptop 7:23	main 11:24
hyperlink 21:4,8,12,14	information 20:7	late 10:21	make 7:4 29:23
	insert 26:3 28:6	law 10:7,14	making 29:14 30:9
	inserted 34:2	lead 24:25	Malek 6:7,14,19 34:20
	inserting 26:6 28:9 31:24 32:10, 16	light 33:6 34:18	matter 10:17
	instructed 7:13	limitation	
	inter 8:23 9:22 10:1		

THE SULLIVAN GROUP OF COURT REPORTERS

Index: generating–matter

meaning 22:22,23,24 32:25 33:5 means 22:15,18,25 31:7 32:19, 21 meat 12:1 meet all 25:22 memory 27:18 mention 12:17 18:4 mentioned 19:11,12 mentions 24:2 menu 26:19 28:14,17,24 mere 24:24 message 13:4,6,10,12,15,17,19, 20,21,24,25 14:2,5,8, 13,17,20,21,23,25 15:5, 12,17,18,22,24 16:5,9, 13,16,19,20,21,23 17:1, 4,7,12,18,21,25 18:1,9, 11,14,18,24 19:5,6,13, 23 21:5,9,10,13,16,21 31:24 32:16 34:2 message- composition 26:4 messages 15:7 29:18 34:9 messaging 8:4,6 missed 24:9 mission 15:6 Mm-hmm 24:13 mobile 8:10 10:5,12 29:11	31:19,20 morning 6:14,15 multiple 33:13 N nature 20:25 necessarily 23:20 25:22 29:23 notes 8:16 noticed 11:18 number 11:6 numbering 11:23 O object 7:12 15:1,15 22:4 24:7, 17 25:2 30:5,14 obvious 25:14,19 OCTOBER 6:1 operate 24:22 operating 24:2,5,12,15,21,24 25:4,6,9,11,12,15,16 opinion 30:19 32:18 33:3,14 opinions 12:3 34:5,8 optionalities 20:23 ordinary 9:13 29:19,25 32:25 33:5	P packet 23:17,18 24:16 pages 8:4 palette 29:2,17 paragraph 12:15,25 15:21 20:13 22:10 24:1,11,12 25:24 31:23 32:4 part 13:12 14:5,8,13 16:15 18:9,24 partes 8:23 9:22 10:1 partly 32:20 parts 18:11,13 past 9:9 patent 9:1,4,5,15 11:12 16:25 17:9 18:5,19 24:2,4,15, 19 25:18 33:4,13,16,18 34:4,13 patents 33:11 PDF 8:1,2 people 8:13 perform 23:8 person 9:13 22:1 29:19,25 personal 7:22 Petitioner 22:13 phrase 16:20 picture	21:1 place 21:1,4 34:3 places 33:21 plain 20:21 22:23 32:15,25 33:5 point 16:1,24 23:5 33:9 pointing 16:2,6 20:11 24:8 portion 32:6 33:8,17 POSA 24:20 30:6,8 31:6 33:6, 14 34:17 POSITA 9:12 23:16 24:25 25:4, 8,14,19 30:20 positions 11:1,3 practice 35:1 preexisting 31:24 32:10,16 prefer 12:23 preferences 34:5 preparation 11:8 preparing 11:4 present 6:3 presented 27:18,20 pretty 33:23 previously 28:21 29:7 printed 12:18,21,23
---	---	---	---

THE SULLIVAN GROUP OF COURT REPORTERS

Index: meaning–printed

prior 10:5,15 11:11 priority 9:14 proceeding 8:24 9:22 10:1 proceedings 35:11 process 13:5,6,13,15,21,22,25 14:8,14,17,21,23 15:23, 25 16:9,20 17:1,3,7,10, 12,18,21,24 18:6,8,9, 12,14,24 program 19:16 programs 8:4,6 provide 7:2,12 8:19 31:18 provided 10:4 12:4 26:14 34:15 providing 8:23 34:4 pull-down 26:19 28:14,17,24 put 17:14 21:8,10,12,15,17, 18 23:10 Putting 12:8 Q qualify 28:4 question 7:8,12,13,16 14:10 16:7 21:6 24:14 25:10 27:1,4 28:10 32:12,13 questions 7:3 34:19 35:8 R rationale 22:16	read 24:19 32:4,6 33:11,12 reading 22:2 ready 12:9 reason 8:19 receipt 23:18,21,23 24:6,16 25:1 receive 18:18 20:5,8 23:22,25 27:14 received 10:24 receives 23:17 receiving 23:19 29:1 recipient 26:14 30:25 31:13 recites 14:11 record 6:17 7:6 34:23 refer 14:8 17:21 24:11 reference 20:11 26:8 references 11:11 12:19 referred 13:14 referring 9:5,18 13:7,15 14:1,14, 20 16:20 20:5,9 regular 29:11 relate 18:11,13 relied 33:18 remember 10:19,22	remotely 6:4 repeat 9:24 27:1 report 11:10 12:1,18 19:7 31:22,23 reporter 6:5 7:3 34:22 35:3 request 20:3,6 requests 34:23 require 13:4 15:22 requirement 19:8 requires 13:19 14:16 15:23 16:8 19:16,25 25:18 respect 18:8 32:24 response 16:11 result 34:6 retained 10:7,9,10,14 retrieve 30:1 review 8:23 9:22 10:1 11:8 reviewed 11:10 27:24 rich 20:16,18,20 room 8:9,13 Rothschild 11:12 20:15 26:2,8 27:22,24 28:19,23 29:1, 14 30:16 31:3,11,12 Rothschild's 25:8 26:6	RPR 12:10 26:18 RTF 20:16 21:1,5,9,11,13, 16,18,21,25 22:1 running 7:25 rushed 35:1 S S-A-M 6:18 Sam 6:7,18 science 22:24 23:7 scope 22:4 24:7,17 25:2 30:5, 14 second-user 20:7 select 18:18 29:17 selecting 18:6,21,23 26:20 28:14 selects 28:16 send 17:24 26:13 29:24 31:7 34:24 sender 26:13 sending 20:16 29:21 30:7,8,23 31:4,7,14 sends 30:22 31:12 sense 11:21 20:22 sentence 32:7,8,9 separate 19:22
--	---	---	--

THE SULLIVAN GROUP OF COURT REPORTERS

Index: prior–separate

server 19:25 23:16,22 25:9,11, 14,16,20,21 27:14,17 29:3,10 30:2,12,22,25 31:1,3,4,8	start 12:7 starting 11:22 18:20 28:12 32:9 starts 11:22 state 6:16 14:15 statement 15:20 states 18:20 static 28:19 29:5 31:17 step 13:21 14:1 steps 13:21 15:10 17:11,20 stipulate 6:3 stored 29:10 strings 33:25 subheading 11:21 substantive 12:6 suggest 16:17 switch 20:12 22:9 sworn 6:4,8 system 22:7 23:19,20 24:3,5, 12,16,24 25:5,6,9,12, 15,16 26:6,24 27:9,17 34:7 systems 24:21 25:4 27:17	tag 21:14,22,24 talk 7:7 talked 13:23 talking 17:13,23 19:18 22:7 30:15 31:9,11 talks 14:5 34:4 teaches 20:15 template 26:4 ten 9:10 35:3 term 16:19 22:14,17 32:19 33:1,6 terms 28:24 testified 6:10 testimony 8:20,22 text 18:6 20:16,18,20,21,23, 24,25 21:17,22,24 22:3 thing 22:15 things 11:24 20:25 23:6,7 25:13 thinking 23:1 time 28:21 33:15 35:2 times 6:22,23 33:13 title 17:15,17 today 7:21,25 8:14,17,20,23 9:11 11:9 34:20	top 32:9 topics 20:12 22:9 transcript 7:4 34:22,25 35:1 transferring 30:24 transmission 22:14,21 23:6 transmit 22:15 30:2 transmits 30:12 transmitting 30:3 treated 21:17 treats 22:14 trigger 14:7,12 15:11 16:10,12 19:19 truth 6:9,10 TUESDAY 6:1 turn 12:6,15 18:19 19:15 20:13 25:24 turnaround 35:2 turned 8:11,12 type 21:20,25 34:1 typically 23:1
stand 12:3 standard 35:1,2	Table 11:19	U U.S. 9:1,5 understand 7:11 8:22 9:5,12,18,21, 25 19:4 23:16 24:20,25	

THE SULLIVAN GROUP OF COURT REPORTERS

Index: server–understand

25:8 29:20 30:1,7,9,20, 21,22 31:6 34:17 understanding 14:3 16:3 26:5 28:18 29:9 31:16 32:18,21 33:10 understood 33:15 upload 26:8 URL 21:20,21,23,25 22:1 user 18:7 26:23 27:2,17,18, 20 28:6,16 29:17,21,24 30:3,12,23 31:14 user's 27:9 users 26:3 34:4,6 V verbal 7:2 W wanted 33:12 Web 8:4 27:5,6,7,8,12,13,19 28:4,5 website 21:19 weird 11:20 Wildseed 10:5,12,18 word 22:22 32:23 33:10,19, 22 34:13,14 work 6:24 7:23 35:4 worked 9:8 10:12	working 10:11,17 works 26:7 27:23 wrote 10:23 Y year 10:20,21 Z Zack 35:7 Zoom 7:24	
THE SULLIVAN GROUP OF COURT REPORTERS		

THE SULLIVAN GROUP OF COURT REPORTERS

Index: understanding–Zoom