

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

CISCO SYSTEMS, INC.,

Petitioner,

v.

ZILKR CLOUD TECHNOLOGIES, LLC,

Patent Owner.

Case

IPR2023-00553

Patent 9,210,254

REMOTE VIDEOTAPED DEPOSITION OF HENRY
H. HOUEH, PhD, called as a witness by and on behalf
of the Patent Owner, Zilkr Cloud Technologies, LLC,
pursuant to the applicable rules of the United
States Patent and Trademark Patent Trial and Appeal
Board, before Patricia Jodi Ohnemus (remotely),
CSR, RPR, RMR, CRR, and Notary Public in and for
the Commonwealth of Massachusetts, at Lexington,
Massachusetts, on Tuesday, December 12, 2023,
commencing at 10:33 a.m. (EST).

Page 1

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I N D E X

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HENRY H. HOUH, PhD	
(By Mr. Stephens)	7

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E X H I B I T S

EXHIBIT	DESCRIPTION	PAGE
Exhibit 1001	US Patent 9,210,254	6
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Exhibit 1005	Patent Application, US 2007/0043687 A1	15
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1 (Exhibit 1001, US Patent 9,210,254.)

2 VIDEO OPERATOR: Good morning. We are
3 going on the record at 10:33 a.m. EST on Tuesday,
4 December 12th, 2023. Please note that the
5 deposition is being conducted virtually. What you
6 see in front of the witness and heard on screen is
7 what will be recorded. Audio and video recording
8 will continue to take place unless all parties
9 agree to go off the record.

10 This is media unit 1 of the video-recorded
11 deposition of Dr. Henry Houh, being taken by
12 counsel here in the matter of Cisco Systems, Inc.,
13 versus Zilkr Cloud Technologies, LLC, filed in the
14 United States Patent and Trademark Office before
15 the Patent Trial and Appeal Board. Case IPR
16 2023-00553.

17 My name is Joe Raguso with Veritext. I am
18 the videographer. The court reporter is Jodi
19 Ohnemus, also with Veritext. I am not authorized
20 to administer an oath. I am not related to any
21 party in this action, nor am I financially
22 interested in the outcome. Counsel will state an
23 appearance and affiliation for the record, followed
24 by the court reporter swearing in the witness.

25 MR. STEPHENS: This is Jeffrey Stephens

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1 with Carter Arnett, representing Zilkr Cloud
2 Technologies.

3 MR. GORYUNOV: Eugene Goryunov with Haynes
4 & Boone. I'm joined together with my colleague
5 Brett Bostrom on behalf of Cisco.

6 HENRY H. HOUH PhD, having
7 satisfactorily been identified by
8 the production of a driver's license,
9 and being first duly sworn by the Notary
10 Public, was examined and testified as
11 follows to interrogatories

12 BY MR. STEPHENS:

13 Q. All right. Good morning, Doctor Houh.

14 A. Good morning.

15 Q. Please state your full name for the
16 record.

17 A. My name is Henry H. Houh. That's spelled
18 H-o-u-h.

19 Q. And have you ever been deposed before?

20 A. Yes.

21 Q. So you understand that you're testifying
22 under oath today?

23 A. Yes.

24 Q. Is there any reason you can't give
25 truthful and complete testimony today?

1 A. No.

2 Q. Okay. Doctor Houh, if -- if I -- you
3 know, I'll be asking a series of questions today.
4 If you don't understand a question, just let me
5 know; otherwise, I'll assume you understand the
6 question.

7 Is that fair?

8 A. Sure.

9 Q. If you need to take a break, you can also
10 let me know, but if there's a question pending,
11 we're going to go ahead and have you answer it
12 fully before taking the break.

13 Is that understood?

14 A. Yes, sure.

15 Q. Okay. So aside from the Zoom program, I
16 understand you have a browser window with the
17 Exhibit Share.

18 Do you have any other programs open on
19 your computer?

20 A. No, just the browser and -- and Zoom.

21 Q. And Exhibit Share is the only thing you
22 have in your -- in your browser there?

23 A. I have a bunch of other tabs. I...

24 Q. Are any of them related to this IPR
25 proceeding?

1 A. No.

2 Q. Okay. Would you be able to close those or
3 is that going to cause issues for you or...

4 A. Well, yeah, I'll close them all. Okay.

5 Q. Thank you.

6 Do you have any other information
7 displayed in the room or on computer relating to
8 this IPR proceeding?

9 A. No.

10 Q. Okay.

11 A. Oh, I have some printouts of some of the
12 documents.

13 Q. Okay. And what are those?

14 A. I have my declaration; I have the '254
15 patent; I have the Bodart reference and the
16 de Castro reference. That's it.

17 Q. Okay. And those are all clean copies or
18 they have your annotations on them?

19 A. No, they're all clean.

20 Q. Okay. And is there anyone else in the
21 room with you?

22 A. No.

23 Q. All right. And just so we're clear,
24 communicating with anyone, including electronic
25 messaging, text, or email with counsel or anyone

1 else regarding your testimony is not permitted
2 during your deposition.

3 Is that understood?

4 A. Yes.

5 Q. All right. During today's deposition you
6 will answer questions regarding your declaration
7 submitted in the IPR regarding US Patent No.
8 9,210,254. If I refer to that patent as the '254
9 patent, will you understand what I'm referring to?

10 A. Yes.

11 Q. What did you do to prepare for your
12 deposition today?

13 A. I reviewed a number of documents, and I
14 met with the attorneys.

15 Q. And when did you meet with the attorneys?

16 A. Yesterday.

17 Q. Okay. Do you know exactly who you spoke
18 with?

19 A. Yes. It was Eugene and Brett.

20 Q. Okay. And you didn't speak with anyone
21 else in preparation for today's deposition?

22 A. No, I didn't.

23 Q. Okay. And I assume this was a -- a
24 telephone conversation with Eugene and Brett?

25 A. It was a Zoom call.

1 Q. Okay. And about how long did that last?

2 A. I think it was about three hours.

3 Q. Okay. In preparing for today's
4 deposition, did you review any documents related to
5 this IPR that you did not review prior to
6 submitting your declaration?

7 A. I -- I did review the institutional
8 decision and the patent owner preliminary response.

9 MR. STEPHENS: Okay. All right. I think
10 we're ready to get into the exhibits. Shall we
11 take a small break and go off the record. Make
12 sure everyone is able to access those?

13 MR. GORYUNOV: Sure.

14 VIDEO OPERATOR: Off the record. The time
15 is 10:40 a.m.

16 (Recess was taken.)

17 (Exhibit 1003, Declaration of
18 Henry Houh, PhD.)

19 VIDEO OPERATOR: We are back on the
20 record. The time is 10:46 a.m.

21 Q. Okay. Doctor Houh, are you able to pull
22 up Exhibit 1003?

23 A. Yes.

24 Q. And is this your declaration that you
25 submitted in this matter?

1 A. Yes, it is.

2 Q. Thank you.

3 And is that your signature on page 124 of
4 Exhibit 1003?

5 A. Yes, it is.

6 Q. And did you draft your declaration?

7 A. I -- I -- you know, it's a -- it was a
8 collaborative process. There are -- so portions.

9 Q. And who did you work with in drafting
10 that?

11 A. I can't remember the exact people I worked
12 with.

13 Q. That would have been counsel or other
14 people that work for you, or...

15 A. It would have been counsel.

16 Q. Okay. And paragraph 2 of your declaration
17 states that (as read):

18 "I am being compensated for my work in
19 this matter at my standard hourly rate."

20 What is your standard hourly rate?

21 A. Well, I -- I'm not sure exactly for this
22 case. It could be 680.

23 Q. Okay. And is there anything in your
24 declaration that you wish to modify or clarify?

25 A. I can't think of anything at the moment,

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1 no.

2 Q. Okay. If you could please turn to
3 paragraph 3 of your declaration, which is Exhibit
4 1003, and so you can see in paragraph 3 you use the
5 shorthand "POSITA" to refer to a person of ordinary
6 skill in the art; is that right?

7 A. Yes.

8 Q. So if I use the term "POSITA" during
9 today's deposition, you'll understand that I'm
10 referring to a person of ordinary skill in the art?

11 A. Yes.

12 Q. Okay.

13 A. It would have been at the time of the
14 invention in -- in light of the prior art in the --
15 yeah.

16 Q. Okay. Thank you.

17 Okay. So just above paragraph 100 of your
18 declaration, Exhibit 1003, there's a figure labeled
19 as "Bodart, Figure 1 (annotated)."

20 Do you see that?

21 A. Yes.

22 Q. Okay. And what are the annotations in the
23 figure?

24 A. The annotations are what are in red and
25 the -- so those are the annotations.

1 Q. Okay. Did you create those annotations or
2 were they provided to you?

3 A. I, you know, worked with counsel and
4 they -- someone -- I don't know who actually made
5 the annotations.

6 Q. In paragraph 100 you state that (as read):
7 "By providing the ability to receive,
8 route, and initiate calls, the virtual assistant is
9 'utilized' to provide 'telephone service to the
10 first user.'"

11 In paragraph 101, you state that (as
12 read):

13 "...it would have been obvious to a POSITA
14 that the telephone service would be provided by a
15 telephone service provider."

16 And give examples such as Verizon, AT&T,
17 and Sprint.

18 Can you explain how Bodart's virtual
19 assistant would be able to initiate a phone call?

20 A. Well, in order to -- it's part of the
21 receiving, routing, and initiating the call, and so
22 it could be part of that process to use -- would --
23 it would have to use a -- a provider to initiate a
24 call or to forward a call, which then, you know, is
25 part of a received call.

1 Have you provide -- could you provide the
2 Bodart reference in the chat too, please, or in the
3 file upload?

4 Q. Sure. Let's pull that up.

5 MR. STEPHENS: So we have Exhibit 1005,
6 which is the Bodart reference. Are you able to see
7 that?

8 A. I have that -- I have it now. Thank you.
9 (Exhibit 1005, Patent Application,
10 US 2007/0043687 A1.)

11 A. (Witness reviews document.)

12 Q. Okay. So is that your -- your full
13 answer, then, on --

14 A. No. No. I'm still looking.

15 Q. Okay.

16 A. Sorry.

17 Q. Okay.

18 A. (Witness reviews document.)

19 So in my declaration I talk here about
20 paragraph 99, which is the paragraph that has the
21 figure. That (as read):

22 "...Bodart teaches the virtual assistant
23 may have 'the ability to initiate telephone
24 calls.'"

25 And that cites paragraph 27.

1 So if you look at the full paragraph 27,
2 it's talking about some query and response
3 abilities that the virtual assistant has; and that
4 (as read):

5 "Using a keyboard or speech processing, a
6 user may query virtual assistant with regard to
7 various aspects of user data. For example, the
8 user may request that virtual assistant find a
9 particular contact by typing or saying, 'Find
10 contact John Doe.'"

11 And then, based on the result of the
12 query, the virtual assistant provides response as
13 an audible or visual message.

14 And so the user can make these queries;
15 and then -- and additionally, the -- as part of the
16 virtual assistant, the assistant has the ability to
17 initiate telephone calls. So, for example, if a
18 user wanted to call the Joe Doe, based on the
19 result of the search, they might say, well, call
20 John Doe, for example; and that's one way.

21 And if there's a -- if they're -- if
22 they're on a voice interface, but there are other
23 interfaces like the web interface and whatnot.

24 So that's -- that's an example of -- of
25 how Bodart talks about initiating phone calls; and

1 there are other ways of -- of -- of forwarding
2 calls and -- and further processing calls that are
3 received as well that Bodart talks about.

4 And so those would utilize the telephone
5 system such as a service provider and, you know --
6 and furthermore, in paragraph 98 in this same
7 section, discussing claim element 1.3, it talks
8 about how -- that the message and call -- this is
9 cited in paragraph 98 -- (as read):

10 "Message and call routing 112 may enable
11 virtual assistant 101 to intercept incoming
12 telephone calls."

13 And elsewhere it talks about how people
14 are trying to reach the user.

15 And so, you know, what it's teaching there
16 is that the -- in order to intercept a call, the
17 service provider, such as the -- you know, Verizon,
18 AT&T, and Sprint, would actually have to provide a
19 mechanism to intercept the call and -- and route it
20 to the virtual assistant so that the virtual
21 assistant can handle the calls directed to the
22 user's telephone number.

23 And so the service provider is -- is
24 helping provide the service in this way as well, in
25 addition to the ability to -- to handle the

1 outbound call requests.

2 Q. So on the outbound call request -- well,
3 strike that.

4 In -- in Bodart figure 1 annotated
5 provided in paragraph 99 of your declaration, it
6 shows a conventional telephone. It looks like it's
7 labeled as 146; is that fair?

8 A. Sorry. I missed the reference you said.
9 Did you say in figure 1 or did you say paragraph,
10 or...

11 Q. Figure 1. Yeah. I'm looking at the
12 annotated figure in your declaration, paragraph 99.

13 A. Okay.

14 Q. And paragraph 101 of your declaration says
15 it was -- (as read):

16 "Figure 1 above shows a conventional
17 telephone 146."

18 Is that correct?

19 A. Yes. That's -- it does say that.

20 Q. And I'm trying to make sure I understand
21 correctly when the next sentence says (as read):

22 "It was well-known that telephone
23 companies or carriers provided telephone service
24 for use by conventional, landline telephones."

25 That is talking about, you know, the

1 service that would be available to that
2 conventional telephone 146?

3 A. I mean, I say that; but, yes, that -- that
4 would be one of the services available to the
5 telephone.

6 Q. Okay. And in what way is the virtual
7 assistant able to use, for example, that
8 conventional telephone 146 to -- to place a
9 telephone call? How would that work in practice?

10 A. Well, for example, if you have a -- a
11 web -- web assistant interface where you can
12 type -- you know, Bodart is teaching that -- that
13 there are different ways of interacting with the --
14 the virtual assistant, and so one of the ways is
15 through the telephone itself; and they give an
16 example of a speech interface where users can speak
17 to the virtual assistant once they're connected to
18 it; and they can be connected to it from the
19 various devices where -- I think I talk about that
20 in my declaration somewhere.

21 But that -- but that another way of
22 interacting with the virtual assistant is with the
23 keyboard. So if a user wanted to initiate a call
24 using this interface, they could connect the call
25 for the user both ways and -- and, you know, the --

1 so, you know, for example, I -- I worked on a PBX
2 system in -- you know, in the late 1990s, and we
3 had a -- we had a way of -- of initiating a phone
4 call from a desktop computer, but it would -- it
5 would ring the phone on my desk and then connect
6 the call through using the telephone interface.

7 But the Bodart does talk about having a --
8 you know, a -- you can -- you can interface the
9 system and initiate an outbound call.

10 But it also talks about, you know, the --
11 that the -- for example, in paragraph 35, (as
12 read):

13 "A web server may supply an interface from
14 a virtual assistant to any computer, cell phone, or
15 other electronic device having a web browser via a
16 computer network such as the internet."

17 So there are many different ways of
18 interacting with the virtual assistant that Bodart
19 describes.

20 Q. Thank you.

21 And in paragraph 101 is it fair to say
22 that Bodart's virtual assistant is providing a
23 telephone service because it is able to place a
24 phone call that uses a telephone service such as
25 AT&T or Verizon?

1 A. Well, I mean, what I'm -- what I'm
2 discussing here is the claim element 1.3, which is
3 (as read):

4 "Wherein -- wherein the server is utilized
5 by a first provider to provide a first service to a
6 first user, wherein the first service is telephone
7 service and wherein the telephone service is
8 associated with a first telephone number."

9 So, for example, you know, because Bodart
10 is clear about providing the service to -- it -- it
11 claims that it can provide the service to multiple
12 users, that's how the claim terms are interpreted
13 in -- in Bodart here, and a POSITA would recognize
14 that.

15 And it's talking about providing these
16 services. You know, one way to provide these
17 services of a virtual assistant is that a --
18 that -- one way is -- like voicemail system, but --
19 right, like, you could buy a voicemail machine for
20 your home and plug it into your landline; or you
21 could pay a service provider like Verizon or AT&T
22 to -- to run voicemail for you.

23 So that was really the only two options
24 that are available for a service like voicemail
25 back in the day. And so -- so it's -- it was a

1 service like voicemail that was offered by a
2 service provider like AT&T. So you could pay them
3 \$1.99 a month, and they'll host your voicemail, or
4 you could buy your own voicemail machine and plug
5 it into your landline at home.

6 Now, Bodart talks about the -- about
7 intercepting calls to users. So one way of doing
8 that is that the service providers like Verizon,
9 AT&T, Sprint that I discuss in my declaration, they
10 provide these services and -- and in order to
11 intercept the call when the -- when the number is
12 called, they simply intercept the call and route
13 it, instead of directly to your phone, your
14 telephone number, route it to a virtual assistant;
15 and then, in that sense, they would be both
16 providing the -- the virtual assistant service and
17 they provide the outbound call service as well.

18 So -- so if you are connected to the
19 virtual assistant using the speech interface and
20 you -- you want to initiate a call to, say, John
21 Doe, as we discussed earlier, then -- then the
22 carrier would provide that connection for you,
23 since you also are using their service to host the
24 virtual assistant that they're providing.

25 It's much like some voicemail systems

1 allowed you to -- when you're on the voicemail --
2 to return the call -- you know, when you're
3 listening to the voicemail to make a call back to
4 the number that left the voicemail; and in that way
5 the -- the service provider's both providing the
6 voicemail service and providing the outbound call
7 connectivity when you're initiating outbound calls
8 from -- from that service.

9 And so that -- that, for example, is -- is
10 what Bodart's talking about.

11 Q. Okay. Let's -- let's move to claim
12 element 1.4. And I have -- I have included as an
13 exhibit Exhibit 1001, which is the '254 patent, and
14 it doesn't have, you know, the number 1.4 in claim
15 1 there, but you understand -- I mean, the numbers
16 you used in your declaration, right, refer to
17 different claim elements and -- and limitations in
18 the claim; is that correct?

19 A. Yes, they're there for convenience, but
20 they're not literally part of the claims in the
21 '254.

22 Q. Okay. So claim element 1.4 is (as read):
23 "Wherein the server is configured to:
24 receive a request to provision a second service for
25 the first user."

1 Is that right?

2 A. Yes, that's the way I referenced it in my
3 report.

4 Q. Okay. What is your understanding of the
5 term "provision" as used in claim element 1.4?

6 A. (Witness reviews document.) I think that
7 when a POSITA's reviewing, you know -- a POSITA
8 would understand that what -- what -- "provision"
9 in this claim means includes what's disclosed in
10 Bodart, which is the -- for example, in -- in
11 paragraph 110 I talk about this claim -- this --
12 this part of the claim element in that, you know,
13 Bodart is teaching about how the virtual -- virtual
14 assistant has a number of features: For example,
15 it can text you when you've got a phone call or,
16 you know -- I think I cite that somewhere in my
17 declaration, but if you want, I can look that up in
18 Bodart and give you an exact place where it talks
19 about that.

20 But it talks about the virtual assistant
21 being able to integrate with the text system.

22 And so, you know, in order to do that, the
23 virtual assistant has to know how to do that; and
24 so someone has to connect up the service into the
25 virtual assistant and -- and that that would

1 include what -- what the Dharmarajan --
2 Dharmarajan -- sorry -- Dharmarajan I think --
3 Dharmarajan, okay, I think that's right --
4 Dharmarajan teaches, which is that a user is -- is
5 maybe required to provide a username and password
6 for the IM system; otherwise, the virtual
7 assistant -- and, then, this is a combination of
8 the two; and so that -- that the -- the virtual
9 assistant would use the username and password to
10 log -- and the user's username and password to log
11 into the Instant Messaging server so that it can
12 send instant messages, you know, for the user.

13 And that would allow the virtual assistant
14 to access the IM service to perform IM-related
15 functionalities as -- such as routing incoming IMs
16 or notifying the user of any newly received IM
17 messages, and that's paragraph 44. And that's the
18 paragraph I cite about -- what it says about IM.

19 There are some other features that use IM
20 as well, but these are the features that I'm
21 talking about in paragraph 110, the ones that I
22 talk about.

23 And so -- so a POSITA would understand
24 that -- that providing the username and password in
25 this way for the virtual assistant to use to log

1 in, it is -- is what is meant and included in the
2 meaning of "provisioning."

3 Q. Okay. So you said providing the username
4 and password. You also used the phrase "connect up
5 the service into the virtual assistant." Those are
6 the things that essentially here you're saying
7 would be included within the meaning of "provision"
8 as used in the claim?

9 A. Well, I -- I think I say it in 111, which
10 is (as read):

11 "...configuring Bodart's virtual assistant
12 by providing the username and password for
13 accessing the instant messenger service renders
14 obvious this -- this element --" I think I call it
15 -- "1.4."

16 So -- so that -- that is something that
17 user would understand and that's -- that -- that is
18 provisioning the second service; and in this
19 example, the second service being the IM capability
20 part of the virtual assistant.

21 Q. Okay. So configuring Bodart's virtual
22 assistant would be the -- the action that's done
23 there?

24 A. Well --

25 Q. After receiving the username and password?

1 A. Yeah, it's configuring Bodart's virtual
2 assistant by providing the username and password
3 for accessing the IM service; and that's the --
4 that's what meets the claim element and discloses
5 the claim element 1. -- 1.4 in this case; and the
6 analysis that I provide is in this section. That's
7 just the conclusion in 111 of my declaration.

8 Q. Okay. Thank you.

9 If we could go back to the '254 patent
10 that's Exhibit 1001.

11 A. Okay.

12 Q. And at column 1, the paragraph beginning
13 about line 27 refers to third-party ecosystems that
14 have different rules and policies for managing and
15 activating their services and applications.

16 And I would like to know what "activating"
17 is referring to in that paragraph. And feel free
18 to take a minute to -- to review that paragraph.

19 A. (Witness reviews document.) So, for
20 example, if you look at column 3, around line 53 it
21 talks about how (as read):

22 "...client may request to add services and
23 applications to the existing telephone service
24 provided by provider 120. Any of various service
25 and applications may be requested, including

1 videoconferencing, text messages -- I'm sorry --
2 text messaging, interactive texting, hosted private
3 branch exchange seats, voicemail systems, and other
4 services and applications."

5 So that gives an example, for example,
6 interactive texting, which is the same example in
7 Bodart that it can use IM services.

8 And these are various applications that
9 are described as using -- that some may use
10 different IDs. Actually, let me find this -- what
11 I was looking at there.

12 So, for example, at the top of column 4,
13 which is right after the section we were looking
14 at, it talks about how (as read):

15 "...first and second ecosystem may not be
16 compatible and require separate IDs (for the same
17 customer) and may have different types of rules and
18 APIs for accessing, provisioning, and using their
19 various services."

20 So, for example, in the telephone system,
21 the I -- what people think of as -- they have
22 telephone numbers. So a user has a telephone
23 number. But in an Instant Messaging system, it's
24 not bound by telephone number. For example, I had
25 an early text messaging system where my user ID was

1 Triple H; and that's not my phone number. And so
2 what this is talking about here is that some of the
3 applications, such as, you know, voicemail,
4 videoconferencing, interactive texting, text
5 messaging may use a different ID like -- you know,
6 instead of a phone number.

7 And so the interactive texting -- or
8 whatever the -- whatever the -- the '254 was
9 talking about just there -- is an example of such a
10 -- another application that may use a different ID.
11 For example, Triple H in my example.

12 And so -- and that's just like the example
13 from Bodart where the voice messaging can be -- you
14 can use IMs and you -- the virtual assistant can
15 add that as a -- as another service to -- to
16 provide information about incoming IMs and whatnot,
17 as I discussed earlier, but also -- also text the
18 user or -- sorry -- message the user in certain
19 cases.

20 And that's what's being described here in
21 the '254; there's a -- very similar example of that
22 in -- in the -- in the Bodart and the combination
23 of Bodart and Dharmarajan that -- that, you know,
24 in order to then activate this -- the IM capability
25 of -- of Bodart, which it -- it describes but --

1 but doesn't talk about a password that's given in
2 Dharmarajan, that the username and password would
3 be provided; and that username would be a different
4 -- it would be a different username than -- than
5 the telephone number because IM systems have
6 usernames like what I had, like Triple H.

7 Q. Okay. Well, I guess what I'm asking
8 specifically is, you know, in the paragraph that
9 begins at column 1, line 27, the term "activating,"
10 what, you know, specific steps or processes is that
11 "activating" referring to? Are you able -- you
12 know, how would one of skill in the art understand
13 that term in that paragraph?

14 A. (Witness reviews document.) I do discuss
15 this in -- in the section related to claim element
16 1.7, which has the language (as read):

17 "[responsive to receiving the request:]
18 activate the second service with the second
19 provider utilizing the second ID as a user ID for
20 the first user."

21 So a POSITA would understand that
22 what's -- what's being discussed here and -- in the
23 combination of Bodart and Dharmarajan is -- meets
24 the -- meets the "activating" or "activate" part of
25 this claim element in that, you know (as read):

1 "It would have been obvious to a POSITA
2 that Bodart's virtual assistant would log into an
3 IM service when the user configures the virtual
4 assistant with the IM username and password, and
5 that logging into the IM service is 'activating the
6 second service.'"

7 And -- and it's because that -- in the
8 virtual assistant in Bodart, without doing that,
9 that service is not available or -- and that by
10 logging in and providing the credentials, that
11 enables the service to utilize that; and in that
12 sense, then -- then now it's an active service
13 because before you provide username and password.

14 The service that's described in Bodart
15 of -- the features available for IM that we
16 discussed earlier, they're not available. They're
17 not -- they -- they -- they're not available or
18 active to the user using the virtual assistant
19 until the user provides the credentials and then --
20 then the virtual assistant can then log in and
21 access the instant messages for that user with
22 their username and password.

23 So it's the step of logging into the IM
24 service that would be recognized by a POSITA as
25 activating the second service. That would be

1 included in the meaning, one of the things.

2 Q. Okay. But you're saying that prior to
3 logging in the service was not available or active
4 through the virtual assistant but it would be
5 available to the user, you know, outside of the
6 virtual assistant; is that correct?

7 A. Well, it -- it -- you know, not -- not --
8 not necessarily. I mean, it could be that the
9 service can -- you know, it's -- it's like
10 sometimes when you activate a second service, you
11 actually have to sign up for the service there,
12 but -- but -- but what I talk about in my
13 declaration here is that -- that -- what -- what
14 meets activating the service is -- is that the
15 service is now active in the virtual assistant in
16 Bodart; and that's an example of what meets
17 activating a second service is that once the
18 virtual assistant now is -- is logging into the IM
19 service.

20 And I talk here about that, you know, (as
21 read):

22 "For example, the virtual assistant would
23 log into the IM service to confirm that the IM
24 username and password are correct and confirm that
25 the connection to the IM server can be

1 established."

2 And before then the -- the capability, as
3 described in -- in Bodart, doesn't work; that
4 capability in virtual assistant is not active. But
5 only -- you know, and the user could have provided,
6 say, a wrong password. That happens to me. I
7 type -- mistype a password, and I can't log in.

8 So until it's -- it's confirmed that
9 the -- that IM can log in, that -- that service
10 described in Bodart is not active or available to
11 the -- to the user because you -- you don't have
12 the right credentials for IM. So anything
13 IM-related that Bodart's describing is not
14 available; and a POSITA would understand that that
15 falls within -- that is an example of activating
16 the service within the virtual assistant of Bodart,
17 and -- and that is what's -- that is how I get --
18 that's what I'm saying in 1.7.

19 Q. So is another understanding of the term
20 "activating" where, for example, the user has these
21 login credentials for the IM service, it sounds
22 like they, you know, obtained those credentials
23 from the IM service, would they have activated an
24 account with the IM service in -- in obtaining
25 those credentials?

1 A. So, you know, I'm -- I mean, you know,
2 there may be services that are -- are offered in
3 conjunction where -- where, you know, you could --
4 you could initiate username, password. I mean,
5 this -- it would be obvious to a POSITA that, you
6 know, if a user didn't already have an IM account,
7 that they could -- as part of some process -- you
8 know, be offered and set up an IM account there --
9 right there.

10 So not -- not -- but even if the user had
11 an account, that capability -- the service being
12 offered by the virtual assistant in Bodart,
13 wouldn't be active until the user provided the
14 username and password and it were verified by the
15 virtual assistant.

16 And so the service within the -- the
17 virtual assistant of Bodart is certainly not active
18 until this is -- is done; and I think it's a
19 different issue whether or not there's a separate
20 service accessible outside of the virtual assistant
21 that's already set up. Even if it were so, a
22 POSITA would still recognize that the example in
23 Bodart, which is the user is providing the
24 credentials that may exist are already -- are --
25 are activating the service -- the connectivity

1 service within Bodart; and that is -- that is a --
2 a second service that is available, the capability
3 to -- to provide the services that -- that I
4 described earlier -- I don't remember what number
5 we were looking at, around paragraph 100 or so.

6 (Witness reviews document.) 110. The
7 service that allows (as read):

8 "...the virtual assistant to access the IM
9 service to perform IM-related functionalities such
10 as routing incoming IMs or notifying the user of
11 any newly received IM messages."

12 Q. So you stated that "There may be services
13 that are offered in conjunction where you could
14 initiate username and password or that it would be
15 obvious to a POSITA that if a user didn't already
16 have an IM account, they could, as part of some
17 process, be offered and set up an IM account
18 there."

19 Do you -- is that stated in your
20 declaration anywhere?

21 A. I think what I focused on was that the
22 second service was the ability for the assistant to
23 do Bodart, but I think it's still obvious, you
24 know, if you're adding all these applications, such
25 as the IM capability, if you didn't already have an

1 IM account, the virtual assistant -- remember
2 there's also a web interface, and it could also say
3 in the voice interface, you know, we did not find
4 an account with that name, is that what you want to
5 set up? I think that's just obvious.

6 You know, if you don't have an account,
7 you can set one up. That happens -- I mean, that
8 was well known everywhere for these kinds of
9 services; and if you already have an account, just
10 provide your username and password.

11 Q. So is your answer no, that that was not in
12 your declaration?

13 MR. GORYUNOV: Objection. Form.

14 A. What I did analyze in that section that we
15 talked about was the user providing username and
16 password credentials and that -- and in that way
17 Bodart activates the service of allowing the
18 virtual assistant to access the IM service to
19 perform IM-related functionalities and -- and that
20 is -- that is -- I think a POSITA would understand
21 that that's within the plain and ordinary meaning
22 of that claim term as -- as I've analyzed it.

23 Q. Okay. So you're talking about logging
24 into an IM service in Bodart, and you've -- your
25 testimony is that a POSITA would -- would

1 understand that to be within the meaning of the
2 term "activating."

3 Is that the same activating, you know,
4 process that would be described in column 1, the
5 paragraph beginning at line 27 where it says, you
6 know, this is -- this is not in the context of --
7 of Bodart or even in the invention of the '254
8 patent. It's talking about the background where
9 you could have third-party ecosystems that use (as
10 read):

11 "...different types of IDs and have
12 different rules and policies for managing and
13 activating their services and applications."

14 Is "activating" there referring to, you
15 know, subscribing to that service, creating an
16 account to obtain a username and password?

17 A. (Witness reviews document.) So the
18 meaning of the word -- the claim term "activate"
19 would be informed by the specification. It's read
20 in the context of the specification, but I don't
21 see anything in there in the spec that -- that
22 excludes the connection of -- of, you know, what I
23 map in -- in my analysis that -- that -- I don't
24 see why that would be excluded.

25 I think a POSITA would understand that

1 that is included, based on reviewing -- you know,
2 understanding the plain and ordinary meaning of the
3 word "activate" in the context of the '254
4 specification at the time of the invention there.

5 You know, it doesn't make any sense that
6 if one of the third-party applications that are --
7 that are discussed -- or the other, you know -- I
8 forget the exact word about the ecosystem that
9 the -- that the messaging ecosystem is different;
10 that if you already had a username and password,
11 why it doesn't -- why activating it is not simply
12 just, you know, providing the credentials. It
13 doesn't make any sense that the service provider
14 would then say, no, we won't let you do that; you
15 have to set up an entirely new password.

16 It doesn't say that anywhere in the spec,
17 and a POSITA wouldn't understand that -- that --
18 that providing the existing username and password
19 are -- are -- a POSITA would understand that they
20 would be -- that kind of action, as I've -- would
21 be within the meaning of "activate" in the context
22 of the specification.

23 Q. Is it possible to activate an IM service?
24 For example, you gave the example of your Triple H
25 ID, would you have considered yourself to have

1 activated that service by signing up and choosing
2 an ID? Does that fall within the meaning of
3 "activating"?

4 A. So what's within the meaning is -- is
5 exactly what I said and provide in my analysis,
6 which is providing a username and password, and
7 then the virtual assistant of Bodart verifying that
8 they -- they work and they can use the
9 appropriate -- they can access the user's account,
10 as I've analyzed in section 1.7. That's within the
11 meaning. 'Cause that's within the -- that would be
12 within the meaning of "activate" a service or
13 whatever the claim -- 1.7 requires, because before
14 the user does so, that service is not available
15 through the virtual assistant.

16 It's the same as -- as what's described in
17 the '254. It's really a parallel example. It's
18 very similar, which is there's a number of
19 different applications that the user can choose to
20 activate; and it describes these things as -- I
21 think in the '254 we talked about it earlier:
22 videoconferencing, text messaging, interactive
23 messaging I think it was -- the phrase used. Let
24 me just verify that.

25 Oh, sorry, interactive texting was the

1 term -- was the phrase used in the -- in the '254
2 patent.

3 And so -- so, you know, it doesn't make
4 any sense to -- here that, you know, the user
5 couldn't use an existing interactive texting ID
6 they may already have and that the system --
7 nothing in '254 excludes that, and it wouldn't make
8 any sense that -- that you couldn't actually
9 connect it to your interactive texting service that
10 you already may have, but that would activate that
11 particular app within the -- the system of -- of
12 the '254 patent in this unified services platform.

13 It's the same parallel to activating the
14 Instant Messaging capability within the virtual
15 assistant of Bodart.

16 Q. I'm asking about other potential meanings
17 of "activation" when you created, you know, in your
18 example of your IM service with the Triple H ID,
19 once you created an account and you had an ID and
20 you were able to access the service, did you
21 consider it activated at that time? Would one of
22 skill in the art have considered that service
23 activated once it was created?

24 A. Well, that service wouldn't be active
25 within the virtual assistant at Bodart at that

1 time, no. So, I mean, there's no reason to exclude
2 the -- the -- providing the username and the
3 password from the meaning of active -- "activate"
4 in the context of '254 patent specification.

5 Q. Well --

6 A. And the example is very similar. If you
7 now are going to enable an instant message --
8 instant -- interactive text application in the '254
9 system, one way to do that is by, you know,
10 connecting it -- connecting -- activating the
11 application within the system is to connect it to
12 an existing account; a person of ordinary skill
13 would understand that that is within the meaning of
14 active or activate or what -- of -- (witness
15 reviews document) -- "activate" in -- in claim 1.7.

16 Q. Okay. But my question is not about
17 excluding the meaning that -- that you're referring
18 to.

19 My question is: One of skill in the art,
20 you know, would the meaning of "activate" also
21 include the process of setting up an account with
22 an IM service to be able to, you know, use that
23 service directly, which is how it sounds like that
24 you used your -- your Triple H ID.

25 Could you use the term "activation" to

1 refer to that, you know, subscription and account
2 creation process?

3 A. Well, I mean, if I had that in Bodart,
4 it -- the -- the service within Bodart wouldn't be
5 active. They're -- like, if -- if -- if I didn't
6 provide my username and password to the Bodart
7 system, the virtual assistant, and then the system
8 didn't verify that that -- those are correct and
9 utilize the -- and was able to utilize the --
10 confirm the connection with the -- with the --
11 whatever service server. It could be email -- it
12 could be -- it could be Instant Messaging as -- as
13 Bodart describes, then the -- that -- that app --
14 those -- that second service, the IM capability
15 accessible through the virtual assistant, wouldn't
16 be -- wouldn't be available; wouldn't be active
17 within the system of Bodart.

18 And so -- so it would -- a POSITA would
19 understand that what -- you know, what I have
20 mapped it to, providing username and password for
21 the provisioning, and then the -- the confirmation
22 and -- and verifying the connection for the
23 activate step that I've mapped it to, those are
24 within the meaning of "activate," you know, as --
25 as claimed.

1 Q. Okay. So you've told me what is within
2 the meaning of "activate" in your opinion based
3 on -- on Bodart; and I'm asking a separate question
4 about generally how one of ordinary skill in the
5 art would understand the term. And I've given the
6 example, you know, that you provided of an IM
7 service that was not within the context of -- of
8 Bodart, right; this was an IM service that you
9 used.

10 If you were to tell one of skill in the
11 art that you activated an account with an IM
12 service by selecting the -- you know, ID triple H,
13 would that person of ordinary skill in the art not
14 understand what you meant by activation there?

15 A. Well, that's -- that's a different
16 context, for one. So people can use the word
17 "activate" in many different contexts. What
18 matters is what the '254 is talking about, about
19 activating these applications in the -- in the
20 unified services platform.

21 So in order to do so, there are all these
22 applications that -- that may exist, and the user
23 can select them. There's a menu -- the '254 talks
24 about that -- and can activate these; and the
25 examples given are like the voice conferencing, the

1 text messaging, the interactive text, things like
2 that. Those are examples of applications, and a
3 person of ordinary skill would understand that the
4 IM capability, as added to the virtual assistant
5 of -- of Bodart, is another such application.

6 In order to add that properly in the
7 system of Bodart, just like adding an application
8 to a unified services platform of the '254 system,
9 you know, that would require a number of, you
10 know -- you know, if you already had a separate
11 text messaging service or a -- that was offered --
12 remember -- remember these are in -- in the '254
13 they talk about different ecosystems, that the --
14 that the -- that the applications are from multiple
15 different ecosystems.

16 And so, you know...

17 And -- and it talks about IDs -- second
18 IDs may be email addresses.

19 So, you know, I don't know what person
20 that this -- that this -- this user in, you know,
21 in -- at the priority date of the -- of the '254
22 patent signs up for unified services platform but
23 doesn't have any other accounts like Instant
24 Messaging, email, and -- and that's not how a
25 POSITA understands.

1 A POSITA understands that users have some
2 accounts. And if you want to activate things with
3 your -- you know, like an Instant Messaging service
4 or interactive text service, as disclosed in the
5 '254, you know, in the context of this is -- people
6 understand that, like, people already have
7 accounts. So there's no reason -- there's
8 nothing -- and there's nothing in the '254 that
9 excludes the ability to activate an application by
10 providing, you know, credentials to an existing
11 account.

12 It would make no sense for a POSITA to
13 read the -- read the spec the way -- this way where
14 that was excluded from the ability to activate
15 applications within the unified services platform
16 of Hunt.

17 So -- so nothing in the Hunt patent talks
18 about -- about excluding the ability to integrate
19 applications for which the user has already a
20 password, but it would be for activating the
21 application within the unified services platform.

22 And the -- the word "activate" can be used
23 in, you know, many different contexts. If you're
24 in chemistry, it has a different meaning; but, you
25 know, in the context of this specification, a

1 POSITA would understand that it includes what I --
2 what -- the -- the analysis that I've done in the
3 examples that I've given that -- that are in the
4 prior art.

5 Q. Let me turn your attention to column 7 of
6 the '254 patent, Exhibit 1001. At line 2 it
7 states -- starting at line 2. (As read):

8 "As a result --" and let me know when
9 you're there. You can follow along.

10 A. Okay.

11 Q. (As read):

12 "As a result, the new application may be
13 assigned to provider 406 and different rules may
14 apply than if the end user were directly activating
15 the new application by themselves."

16 Is that a -- a different context than what
17 you're talking about where the user already has an
18 account with the service provider when it talks
19 about directly activating the new application?

20 A. (Witness reviews document.) I mean, it
21 says what it says there. It's -- what it's saying
22 there is that the -- in this particular example --
23 and it's using permissive language. This is an
24 example of where the application may be assigned to
25 provider 406, and provider 406 is the -- is the one

1 that's -- that -- that is providing the storefront
2 and the ability to pick from various applications
3 that may be in a different ecosystem, and in this
4 particular example is just saying that the -- that
5 this, in this example, that new application may be
6 assigned to the provider and different rules may
7 apply than if the enduser were directly activating
8 the new application themselves.

9 That's all this is saying. It's
10 permissive language. It doesn't have -- I'm -- it
11 doesn't say anything about this is the only way it
12 must work or, you know, that it has to work this
13 way all the time.

14 Q. But does it indicate that it's possible to
15 directly activate an application without going
16 through the unified services platform?

17 A. Well, I mean, again, if a user had made
18 such an activation, the -- the user, the system in
19 the '254 wouldn't know about it until the user told
20 them about it. So just because the -- you know,
21 the user has to pick these applications. And if
22 the user has activated it themselves, the -- the
23 application still wouldn't be an active application
24 in the context of the -- of the '254 system
25 because, you know, how does the system know that

1 the user did that?

2 You have to tell the system. So once you
3 then select the application to add, just like I've
4 analyzed, you know, one way would be you tell it.
5 You tell it, I have this application already. I
6 did do this -- I did already set it up. But in
7 order to activate it -- the application within the
8 system -- and that's the context of the '254 --
9 that -- that now you have to tell it, oh, yeah,
10 here's my username. Here's my password to
11 provision the application; then the -- then the
12 system would have to verify that that actually
13 works; that you entered the right combination.
14 Otherwise then the application wouldn't be a part
15 of the applications available in '254.

16 And that's just the way that -- that
17 Bodart is -- as I provide in my analysis, and a
18 POSITA would recognize what I provided as an
19 example of activating and provisioning would be --
20 would be included in provision and activate in --
21 in the claim -- in the claim -- in the plain and
22 ordinary meaning of the claim terms.

23 MR. STEPHENS: Okay. We've been going for
24 a while. I'm good to keep going, but does anybody
25 need a break?

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MR. GORYUNOV: Let's take a short break.

MR. STEPHENS: All right.

VIDEO OPERATOR: We are going off the
record. The time is 11:58 a.m.

(Recess was taken.)

(Whereupon the deposition recessed at
11:58 p.m.)

1 AFTERNOON SESSION (12:29 PM.)

2 VIDEO OPERATOR: We are back on the
3 record. The time is 12:29 p.m.

4 Q. Okay. Doctor Houh, before the break we
5 were talking about in column 7, lines 2 through 5
6 of the '254 patent, activating a new application.

7 My question is did you consider this
8 passage in determining how one of ordinary skill in
9 the art would understand the meaning of "activate"
10 in claim 1 of the '254 patent?

11 A. Yeah. I mean, I reviewed the -- I
12 reviewed the whole spec, and I considered the spec
13 as a whole and so -- and, you know, it -- again,
14 it's permissive; it talks about that word, but --
15 but the claims are what the claims say, and they
16 don't further impose limitations.

17 And so I applied the plain and ordinary
18 meaning of the word "activate" in my analysis, and
19 that would be understood by a POSITA to include the
20 analysis that I did with the system of Bodart, that
21 is, they -- the IM service is now activated within
22 the virtual assistant of Bodart, just like an
23 application could be active within the unified
24 messaging system -- activated within the unified
25 messaging system of -- of the '254.

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1 Q. So if in this passage in column 7, lines 2
2 through 5, if that "activating" is talking about a
3 user doing something like subscribing or creating
4 an account, then is there somewhere else in the
5 '254 patent that describes activating in the sense
6 that you're talking about; and using that term in
7 the sense that -- that you are with -- with Bodart
8 in terms of providing login information in the --
9 in the unified services enabler platform and
10 calling that activating?

11 A. Well, you know, how would a user in the
12 '254 add an application when -- when the -- when
13 there's -- when there's a -- if the end user
14 activated a new application by themselves, how
15 would this unified messaging platform know that
16 that's an application they wanted to add? How
17 would they know? They wouldn't know unless the
18 user told it.

19 And so that's the general context of the
20 '254; that there are these applications. It does
21 talk about the end user activating -- "directly
22 activating a new application by themselves," but
23 then how would they activate the capability of that
24 application within the context of -- of the '254
25 unified services platform?

1 And the person of ordinary skill would
2 understand, well, that's easy when you have a -- it
3 would include, you know, a -- what I -- what I
4 provided, which is, provision it and activate it,
5 and doing so would then allow that application to
6 be used in the unified services platform.

7 It's not excluding, you know, any existing
8 services that -- in these other ecosystems that the
9 user may already have. Doesn't say that -- doesn't
10 talk about that anywhere. And the claims language
11 themselves don't -- don't have any language that
12 limits the -- the -- where or when the -- the --
13 that capability is activated, the service is
14 activated.

15 And so -- and things can be activated
16 multiple -- you know, just because a user activated
17 outside doesn't mean that they can then not
18 activate it within the context of the unified
19 services platform by providing credentials which
20 are then used to -- to check and verify the
21 credentials and -- and test the connection.

22 Q. Is there some passage in the '254 patent
23 that you read and, through that passage, understood
24 the term "activate" to be referring to the process
25 of allowing, you know, the user within the unified

1 services platform to be able to access the
2 application?

3 A. Well, it talks about how the user adds --
4 adds the applications to their -- to their -- the
5 platform for their account. I think I saw that in
6 numerous places. And that would then allow the --
7 the -- that particular application to be used in
8 the context of the unified services platform; and
9 in that sense a POSITA would understand that's
10 activating the application for the platform.

11 So -- so, you know, the claim itself
12 doesn't limit when activation occurs or how it
13 occurs. It just uses the word "activate."

14 Q. If I could direct your attention to column
15 9 of the '254 patent, Exhibit 1001, starting about
16 line 28 there is -- that paragraph begins
17 "Referring now to figure 7."

18 Do you see that paragraph?

19 A. Yes.

20 Q. Okay. So here this is talking about
21 figure 7 which it describes as (as read):

22 "...an embodiment of a method 700 for
23 initiating a service for a first user."

24 Does this section describe the process
25 that you're talking about being activation where

1 the user is able to utilize the service within the
2 unified services platform?

3 A. (Witness reviews document.) Could you
4 repeat the question, please.

5 Q. Yes.

6 I'm wondering if this section describing
7 the figure 7 embodiment describes the process that
8 -- that you're talking about being activation where
9 the user is able to utilize the service within the
10 unified services platform.

11 A. So this process -- this passage does
12 describe a situation in which the -- a second
13 service is -- has been activated by the telephone
14 service provider by the first user. It's already
15 been activated.

16 So it's -- it may not be the same, but
17 what -- this is talking about a -- initiating a
18 service for the user using that app in a --
19 particular circumstances I think -- or a session --
20 a session.

21 If you look at it, it's -- the language
22 talks about one session of the -- of usage.

23 Q. Where is that that it talks about that?

24 A. Well, in -- in the figure 7, box 720 is
25 initiating -- "initiate a session of the second

1 service 720." And then let's see...

2 Yeah. And then around line 60 it says (as
3 read):

4 "...the telephone service provider may
5 generate a request to initiate a session of the
6 second service, and the request may include the
7 second ID in order to identify the first user."

8 But this one -- this one talks about how
9 they -- (as read):

10 "...the second service has already been
11 activated by the telephone service provider for use
12 by the first user."

13 And that's what it says at line 43 to
14 45 -- 46.

15 Q. Okay. Let me direct your attention to
16 column 10.

17 A. Okay.

18 Q. Starting at line 4 it's talking about (as
19 read):

20 "Turning now to figure 8. An embodiment
21 of a method 800 for activating a service for a
22 first user is shown."

23 A. Sorry. I'm sorry. What line? Oh, line
24 4. Okay. I'm sorry.

25 Q. Content -- yeah -- starting at line 4 is

1 where it begins a discussion of figure 8.

2 Do you see that?

3 A. Yes, I -- I'm there now.

4 Q. Okay. If you go down to about line 40,
5 there's a sentence there that begins (as read):

6 "In one embodiment, traditional customers
7 who are not connected to the unified service
8 enabler platform may utilize a first API for
9 interfacing to the second provider when activating
10 the service."

11 Would you agree that "activating," as used
12 in that sentence, is talking about activating in a
13 different sense than the way you've been describing
14 it?

15 MR. GORYUNOV: Objection. Form.

16 A. (Witness reviews document.) Well, in the
17 description of figure 8 it talks about there's --
18 it's -- it's an embodiment, but other
19 embodiments -- if you look at column 10, line 7 (as
20 read):

21 "It should be noted that in various
22 embodiments of the method described below, one or
23 more of the elements described may be performed
24 concurrently in a different order than shown or may
25 be omitted entirely. Other additional elements may

1 be performed as desired."

2 Well, this is clearly just one example
3 among multiple examples that it's not necessarily
4 listing explicitly, but it clearly says that you
5 can omit steps or add additional steps as -- as
6 desired, or...

7 And so there -- it is talking about
8 activating the service. It talks about -- it uses
9 "activate" in numerous contexts here as well. So I
10 think we have to look at the specific context, but
11 just because you're activating a service in one
12 place doesn't mean you can't then, you know,
13 activate it -- the service again in the context of
14 something different.

15 And so, again, the claims don't restrict
16 "activate" to a specific time and place. It's --
17 it simply just -- whatever the wording of -- I
18 think it was of 1.7.

19 Q. So in column 10, lines 40 to 43 when it
20 uses the term "activating the service," you're
21 saying that's a -- a different context than setting
22 it up for use within the unified services platform?

23 A. Well, the application -- I mean, there
24 are -- there is another section that talks about
25 the user's -- well...

1 (Witness reviews document.) So if you
2 look at, for example, column 6, this is an example.
3 Around line 52, it's talking about the -- the
4 services platform and the applications which
5 provide a service to those on -- on the platform
6 and that the -- that the user may select -- this is
7 line 52 of column 6 (as read):

8 "The user may select applications via the
9 storefront hosted by the provider and then the
10 selected applications may be activated by the
11 unified services platform. As shown in unified
12 services platform 404, the user has already
13 selected three applications which are associated
14 with telephone number --" they give an example
15 telephone number.

16 But, for example, if you're activating
17 a -- and of course the patent talks about having
18 a -- the different ecosystems may use different
19 IDs. So if you're activating an application that's
20 for an interactive text application like an IM
21 application and it -- you know, you -- you'd
22 send -- you need to have the -- the user's ID; and
23 so this is very parallel to the Bodart, which
24 allows, you know, the virtual assistant to -- to
25 integrate with a user's email, a user's IM, which

1 are offered by typically different providers,
2 different ecosystems in -- in the language of the
3 '254 patent.

4 You know, I may be signing up for the
5 service from Verizon that offers the Bodart virtual
6 assistant platform to intercept my calls, but in
7 order to connect it to email to get the
8 capabilities and activate the capabilities of email
9 on the virtual assistant, you'd need the right
10 credentials.

11 But until that point, if you don't provide
12 the credentials and -- and the system doesn't check
13 the credentials, you haven't provisioned this email
14 service capability within the virtual assistant of
15 Bodart, nor have you activated it to -- you know,
16 tested it and -- and verified that you can connect
17 with the service, as I -- as I describe in the
18 different sections of my analysis.

19 So I -- I mean, the claims don't restrict
20 "activate" in -- in a way that -- that limits it to
21 when or where the activation is occurring. It's
22 simply using the word "activate" in the plain and
23 ordinary meaning of the terms in the context of the
24 specification. A person of ordinary skill would
25 understand that the examples in Bodart are -- are

1 examples of -- of what's included in the -- in the
2 claim scope of those -- those terms as used in the
3 claims of the '254.

4 And they're -- they're very -- the -- the
5 disclosures are -- are somewhat and very parallel
6 in the sense that there are different applications
7 that can be added to the unified services platform
8 for a particular user in the '254; and -- and in
9 the Bodart, the user can connect up to various of
10 their third-party services -- like email and
11 Instant Messaging -- to unify all those services
12 under one virtual assistant.

13 Q. Is the sentence at column 10, lines 40 to
14 43, an example of activating a service outside of
15 the unified service enabler platform?

16 In other words, does the '254 patent allow
17 for the possibility that a service may be activated
18 outside of the unified platform?

19 MR. GORYUNOV: Objection. Form.

20 A. (Witness reviews document.)

21 Q. I'll strike the question.

22 In column 10, lines 41 to 43, the '254
23 patent states that (as read):

24 "...traditional customers who are not
25 connected to the unified service enabler platform

1 may utilize a first API for interfacing to the
2 second provider when acting -- activating the
3 service."

4 Do those users use the unified service
5 enabler platform to activate the service referred
6 to in that sentence?

7 A. Well, the language here is a little bit
8 funky. I mean, API is an application programming
9 interface, which -- it's slightly different than
10 the user interface. And so this is -- it's -- it's
11 saying that the -- that there may be different APIs
12 for activating the service from the -- the -- this
13 other service provider.

14 I mean, that's all it's saying here is
15 that the -- the programming interfaces may be
16 different for -- when activating the service.

17 Q. So you might have one set of users who are
18 using the unified service enabler platform which is
19 using one set of APIs to activate the service and
20 another set of users who are not using the unified
21 service enabler platform using a different set of
22 APIs to -- to activate the service through some
23 other process? Is that what is being described
24 here?

25 A. Well, it would really be the software used

1 by the users that use the APIs. I mean, the -- the
2 users aren't -- aren't programming these interfaces
3 in that sense using the APIs. It's -- they may be
4 using software -- and that makes sense because the
5 software used to IM on your desktop would be
6 different than the software that's used to connect
7 to the service from the unified services platform.

8 Q. Okay. But there are two different sets of
9 users using different platforms and in one case
10 it's not the unified service enabler platform but
11 they're still able to activate the service; is that
12 fair?

13 A. Well, it does say that there's a different
14 first API, that's different than a second API, "for
15 interfacing to the second provider when activating
16 the service."

17 I mean, that -- that's what it says. I'm
18 not denying what it says. That's just describing
19 the -- the -- the software interface used by
20 different software that the user may use versus the
21 software that the unified services platform uses.

22 Q. Is the "activating" referred to in this
23 sentence at column 10, lines 40 to 43 different
24 than providing login information to unified
25 services platform in order to use the application?

1 A. Well, I mean, it says what it says here,
2 and when -- when used in the claim, I think 1.7,
3 "activate" doesn't -- doesn't have -- the claim
4 doesn't use any language to further restrict
5 "activate" to any particular situation. So it's
6 just using the word "activate." It doesn't say
7 when, where, what API to use.

8 The claim only says "activate." And this
9 -- I'm not denying that this section uses the word
10 "activate"; but, again, this makes sense because
11 the software interface that the software user might
12 use on, say, their desktop is different than the
13 software interface that the unified services
14 platform would use when -- when the -- when the
15 service is activated within the unified services
16 platform and that service is enabled for that
17 particular user, that application is added to that
18 user's platform -- their -- their instance or their
19 interface to the platform.

20 Q. Let me ask this: If we turn to figure 8
21 of the '254 patent. If you could let me know when
22 you're there.

23 A. Yes, I'm here.

24 Q. Okay. So if you notice in box 820 it says
25 (as read):

1 "Send the user's telephone number and
2 other relevant data to the second provider to
3 activate the service and associate the service with
4 user's telephone number."

5 Right?

6 A. That's what it says in the box. Sure.

7 Q. In 835 it talks about (as read):

8 "Utilize this routing information for
9 setting up and enabling sessions of the service for
10 the user."

11 What -- what is the -- that referring to
12 that's different than activation?

13 A. Are you referring to both those things
14 together or each separately? Is this -- is this
15 two questions or one question?

16 Q. Well, it sounds like from box 820 that the
17 second service is activated.

18 Would you agree with that?

19 A. (Witness reviews document.) Well, I -- I
20 think that's what it's saying partly in step 20 is
21 that when it sends relevant information -- and
22 remember figure 8 is described as -- as there could
23 be variations on the steps. Steps could be
24 omitted. Steps could be added.

25 But in this example we're looking at, this

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1 is saying that it uses extracted information. (As
2 read):

3 "The unified services enabler platform may
4 send the user's telephone number and other relevant
5 data to the second provider to activate the service
6 and associate the service with the user's telephone
7 number."

8 So in one sense of "activate," 820 is --
9 is -- is doing the activation, that is, it isn't
10 already activated in one sense at the beginning of
11 820 -- before 820.

12 Q. But after 820 you generate the necessary
13 routing information for using the service in 825,
14 send this routing information to the first and
15 second providers in 830.

16 At that point is the application available
17 for use within the platform?

18 MR. GORYUNOV: Objection. Form.

19 MR. STEPHENS: I'll strike the question.

20 Q. After the steps performed in box 820, is
21 the application available for use within the
22 platform?

23 A. (Witness reviews document.)

24 MR. GORYUNOV: Objection. Foundation.

25 A. Well, it talks about -- in 11, column 11,

1 (as read):

2 "After block 820, the unified service
3 enabler platform may generate the necessary routing
4 information for using the service."

5 And that's block 825.

6 Let me just skip to what the description
7 for 835 is. At line 8 (as read):

8 "The first and second providers may
9 utilize this routing information for setting up and
10 enabling sessions of the service for the user
11 (block 835.) In one embodiment, the sessions may
12 bypass the unified service enabler platform and
13 work independently of the unified service enabler
14 platform. In another embodiment the unified
15 service enabler platform may receive context data
16 while the session is taking place and then -- and
17 the unified service enabler platform may use this
18 context data to provide enhanced services to this
19 user."

20 And then it goes on to talk about how you
21 can activate different services and applications
22 from multiple different providers. But what it's
23 saying here is that now, you know, the application
24 is active -- activated within -- within a user's
25 unified service enabler platform.

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1 And then sessions with the application --
2 within that context -- and actually outside of the
3 context -- can -- can take place but within the
4 context so that you can provide the enhanced
5 services to the user -- enhance -- and so what it's
6 talking in 835 is about enabling and setting up
7 sessions to the -- to the -- to the plat- -- to the
8 other service, but -- but that application is -- is
9 now active within the user's unified services
10 platform. Their -- their -- their platform.

11 And so now that it's active, you can --
12 the system can aid in -- in opening sessions and
13 getting the right data -- or receive the right
14 context data while the session is taking place; and
15 that the -- the unified service enabler platform
16 may use this -- this context data to provide
17 enhanced services.

18 That's what it's saying here.

19 So, yes, in -- by 835, step 820 activation
20 has occurred. In this -- in this example where
21 some steps could be omitted, some steps could be
22 added, but in this particular example, it's
23 occurred in 835 describing a session to the
24 application that is -- is currently taking place
25 and the kind of enhanced services that the unified

1 services platform can provide when it receives the
2 appropriate context data about any session
3 that's -- that's going on.

4 Q. Okay. We're going to move on to Exhibit
5 1008, which is de Castro; and that should be
6 available in the exhibits folder.

7 A. Okay. I see it. I'll download it now.
8 (Exhibit 1008, Patent Application, US
9 2012/0016932 A1.)

10 A. Okay. I have it open.

11 Q. So in your declaration, de Castro is used
12 as a separate grounds for challenging the claims of
13 the '254 patent; is that right?

14 A. Yeah, that's right. I think it's a
15 separate single reference obviousness challenge.

16 Q. So can you give me kind of a high level
17 description of de Castro? What -- what type of
18 system is that?

19 A. (Witness reviews document.) Well,
20 de Castro is describing a -- a communication
21 application server and that it provides a unified
22 framework for call control and media control.

23 And then there are API servers on the --
24 on the communication application server that define
25 messaging API protocols to enable application

1 scripts to pass commands remotely to the
2 communication application server to operate it.

3 And that allows a number of application
4 scripts to be processed remotely by appropriate
5 scripting engines. And in that way the application
6 scripting is decoupled from the operation of the
7 communication application server.

8 Q. So what's an example of the type of
9 service that de Castro would provide?

10 A. (Witness reviews document.) So if you
11 look at de Castro, it talks about application
12 scripts. I'm -- also I talk about this in
13 section -- the analysis for 1.3 in this ground,
14 starting around paragraph 215.

15 But if you look at paragraph 218, what I'm
16 saying here is that the -- de Castro is talking
17 about application scripts that define the
18 communication application 300 and directs how a
19 call is to be handled.

20 And by analogy, the app script at 610-1
21 defines customer 1 -- 1s or they're the first
22 provider, they define their communication
23 application and directs how a call is to be
24 handled, and thus the communication application
25 embodied by app script 610-1 is the first service.

1 So -- so the -- the apps are the
2 service -- is -- in one example is app scripts --
3 the app defined and embodied by this example, app
4 script 610-1, that's -- that's the first service
5 that I'm mapping it to.

6 There are other -- other services that are
7 embodied by other application scripts, but that's a
8 particular one that I chose for this example.

9 Q. And you talk about a call and call
10 handling. What are -- what are these calls coming
11 in to de Castro?

12 A. (Witness reviews document.) Well, the --
13 the invention is about a communication application
14 server that is provided with the unified framework
15 for call control, and the example calls, for
16 example, on the background of the -- of the
17 specification, the background section, for example,
18 talks about in column 2 -- or paragraph 13, talk
19 about various call scenarios, among a number of
20 clients such as VoIP phones or endpoints in the
21 communication application server.

22 And it's a -- it can be -- if you look at
23 figure 2A and B -- and it's a -- it can be --

24 (Court Reporter comment.)

25 THE WITNESS: Oh, sorry. It can be -- I

1 don't remember exactly everything I said after
2 that.

3 But it's a -- it's describing these calls
4 in figures -- example calls in figures 2A through
5 2C, and this is an example call server in 2A where
6 the VoIP phone is connected to the application
7 server. And there's another example in 2B where
8 media is bridged through the application server;
9 and there's also some -- some direct media as well.

10 And -- and 2C describes a call conference.
11 And so, I mean, there are some appropriate
12 descriptions around paragraph 13.

13 So, yeah, 2A is a VoIP phone calling a
14 communication application server, and the
15 application server hosts an IVR, which is an
16 interactive voice response system, and the VoIP
17 phone calls the IVR. That's like calling your
18 credit card company where then you use touch
19 tones -- at least back in the day -- to enter data
20 through the IVR so that can take information and
21 bring up your account and read you your balance and
22 things like that. That's an example.

23 2B talks about a VoIP phone calling a
24 second VoIP phone, but there's a third-party
25 controller that controls the call between the first

1 and second phones; and figure 2C illustrates three
2 phones in a conference.

3 So those are example calls and -- and I
4 think all of those are shown to -- in figure 2 to
5 have some interaction with the application server.

6 Q. So who are the -- I believe de Castro uses
7 the terms "customers" and "clients." What is the
8 difference between those terms in de Castro?

9 A. (Witness reviews document.) So the way
10 de Castro talks about customers are -- customers
11 are actually the people who are -- are providing --
12 are the application scripts to be run; and the
13 clients are the -- the users that are calling into
14 these various -- the application server where they
15 may be -- cause the execution, you know, the
16 startup and execution of a particular application
17 script that is provided by a customer.

18 So the -- that's the difference in the way
19 de Castro is talking about it. And I do talk about
20 these in my declaration. I can point you to parts
21 of my declaration if you'd like.

22 Q. That's okay. Thank you.

23 Does de Castro describe a platform where a
24 client can view different applications and
25 services?

1 A. (Witness reviews document.)

2 Q. I can modify the question a little bit,
3 Doctor Houh, maybe it would make it easier. But
4 does -- does your declaration describe or point to
5 where in de Castro de Castro would describe a
6 platform where a client can view different
7 applications and services?

8 MR. GORYUNOV: Objection. Form.
9 Foundation.

10 A. Well, I was just looking at paragraph 102
11 in de Castro that is discussing Figure 13, and it's
12 illustrating (as read):

13 "...a typical implementation of deploying
14 communication applications on an IP network such as
15 the internet. A plurality of application platforms
16 is deployed -- 100 is deployed on the network to
17 provide communication services when hosting any
18 number of communication applications defined by the
19 application scripts 210."

20 So in that sense there are platforms
21 then -- and they are providing any number of
22 application scripts.

23 I do talk in my declaration about -- if
24 you look at paragraph -- around 2 -- 229 -- about
25 how -- and I cite to de Castro paragraph 119 that

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1 says -- that talks about (as read):

2 "...a plurality of scripting engines for
3 the customers to host and process the customers'
4 application script 610."

5 Q. Okay. So how -- how does a client access
6 de Castro's system?

7 A. (Witness reviews document.) If you look
8 in paragraph 102, it talks about how (as read):

9 "Clients such as VoIP phones 30
10 application phones 40 and other terminal equipment
11 is able to access a specific communication
12 application by calling a dialed number or an -- an
13 URL, and the call is routed by an access
14 server/router 14 into the IP network."

15 So one example it gives is you just call a
16 number and that accesses a specific communication
17 application.

18 Q. Okay. Are there other examples that you
19 rely on in your declaration?

20 A. (Witness reviews document.) Well, at
21 least in paragraphs 225 and 226 I'm -- and 227 I'm
22 relying on calling a telephone number. So actually
23 that cites to a different paragraph, paragraph 116.
24 So that (as read):

25 "For example, de Castro explains that a

1 communication application can be accessed by
2 calling a number."

3 And that's what 116 says, which is (as
4 read):

5 "VoIP phones are -- is able to access a
6 specific communication application by calling a
7 dialed number or a URL."

8 I think that's what -- the same thing as
9 what it said in -- in 102 or very similar as well
10 that I just read. That's 116.

11 Yeah, which has similar language.

12 But at least in those paragraphs of my
13 declaration I am depending on this telephone
14 number.

15 Q. And which is the -- is there -- is there a
16 telephone number in de Castro that you're
17 considering to be a first telephone number in claim
18 1 of the '254 patent in your analysis?

19 A. Yeah, so the telephone number of the
20 client seeking to access a communication
21 application by dialing a number is the first
22 telephone number. So that's in paragraph 226.

23 So in that -- in this case, the first
24 telephone number of the claim is the telephone
25 number of the client seeking to access an

1 application.

2 Q. And in what way is that telephone number
3 associated with a telephone service?

4 A. So if you look at paragraph 226, the --
5 the telephone -- so it goes on to talk about -- in
6 paragraph 141 -- give some examples; and for an
7 incoming call -- incoming call right at -- you
8 know, just -- just above and below the paragraph
9 labeled 141, I've got that section excerpted; and
10 if you can see the -- the "from" telephone number
11 there, that's the -- that's the first telephone
12 number; that's -- that highlight is -- is mine by
13 the way, the underline. The -- the -- that's the
14 message that -- that's an example message, and
15 that's the commands; and de Castro is teaching that
16 the commands of the communication application
17 explicitly include the client's telephone number
18 and, accordingly, that's how de Castro teaches that
19 a communication application for the first service
20 that the client is accessing via telephone is
21 associated with the client's telephone number.

22 Q. If another client were to dial that
23 telephone number, would -- would -- would -- would
24 that client's telephone number then also be
25 associated with the communication application?

1 A. So that -- that -- when a different user
2 calls in, then the "from" in this excerpt would be
3 the from -- the telephone number of the second
4 use -- client that's calling into the -- the
5 application.

6 So that -- you know, what -- what this is
7 showing here, this message is -- is providing this
8 association because it will include the -- the
9 calling party's telephone number in the "from"
10 part.

11 Q. So any number of clients may have their
12 telephone number associated with that application
13 if they call that -- the number that brings them to
14 that application script?

15 A. Yes, I think that's what I'm saying here
16 is that that's how the association is -- occurs, is
17 that, there's a message and the message -- showing
18 that there's an association because it is listing
19 the "from" number.

20 Q. So in limitation 1.4, which that section
21 of your declaration appears to begin at paragraph
22 229, I understand from paragraph 231 that you would
23 consider the first user calling to access one of
24 the communication applications, you'd consider that
25 action to be the claim to request to provision a

1 second service? Is that -- am I reading that
2 right?

3 A. In 231 it is that -- one of the
4 application server receiving from an application
5 client a call to access one of the communication
6 applications is -- is a request to provision a
7 second service. That script has to be fired up and
8 run in response to the -- the call. And it's that
9 incoming call that prompts the app server to
10 register a call ID for the call -- and start a call
11 actor; and then I go on to explain in the remainder
12 of this section how that's working.

13 Q. So is that first user in paragraph 231, is
14 that the same client that you refer to in the
15 previous sections discussing claim element 1.3?

16 A. Yes, it would -- it would be the first --
17 the same first user. It's -- it's a client that
18 calls into one app and then calls into another --
19 the second app.

20 Q. Does the client know that they're
21 calling -- their call is utilizing the de Castro
22 system?

23 MR. GORYUNOV: Objection. Form.

24 Q. Let me rephrase that.

25 If a client in de Castro calls and

1 utilizes the de Castro system, for example, by --
2 by calling into an integrated voice response
3 system, would -- does de Castro indicate whether or
4 not that client would be aware that they're
5 utilizing the de Castro system?

6 MR. GORYUNOV: Objection. Form.

7 A. I mean, I'm not sure I discuss the
8 awareness of a user. I don't think the claims
9 require users -- have any language about what the
10 users are aware of. So I'm not sure I -- I'm not
11 sure that would be in my declaration.

12 Q. Well, you are saying that it's the same
13 user that's trying to access a -- a second service;
14 right? So how does that user know that -- or is it
15 just by coincidence that the -- that user happens
16 to call a number that accesses a second service?

17 MR. GORYUNOV: Objection. Form.

18 A. I mean, de Castro's not -- doesn't --
19 isn't talking about coincidences nor -- de Castro's
20 disclosing clients which can call into various
21 numbers that execute various application scripts.
22 There's no restriction on de Castro that once you
23 called one application, somehow you're somehow
24 blocked from calling any other application.

25 But it's about a system that supports

1 multiple customers providing different application
2 scripts and then users being able to call into
3 whatever application script. So that's just
4 disclosed by de Castro. I think a person of
5 ordinary skill would understand that -- that users
6 can call one script, they can call another script,
7 they can call their friend. They can call whoever.

8 But de Castro is disclosing multiple
9 different applications, and then they're accessed
10 by calling different numbers and that there are
11 plenty of user clients, including VoIP phones or
12 other -- other ways to make call -- other types of
13 clients that can call these application scripts.

14 So that's just what's disclosed by
15 de Castro. I don't think -- I think that's -- a
16 POSITA would understand that different users may
17 call the same application script; different -- the
18 same user may call different applications and --
19 and execute -- and therefore invoke different
20 application scripts.

21 Q. For claim limitation 1.6 you talk about a
22 JID -- I believe that stands for Jabber ID. Would
23 the same Jabber ID be used if the same user called
24 in a second time to the -- the same telephone
25 number?

1 A. (Witness reviews document.) I mean, I
2 think in my analysis I think it's sufficient to
3 show that the second ID is as -- as the Jabber ID
4 disclose, even for just a single call, sufficiently
5 meets the claim elements. So I'm not -- at least I
6 don't see in this section where I discuss the --
7 the situation you're asking about.

8 What I am describing is that in the -- in
9 the call into an application, that there is a
10 Jabber ID and it is used in the way the claims
11 require; and I think it's sufficient even just for
12 a single call, as I'm analyzing here in my
13 declaration.

14 Q. Okay. And continuing on to claim element
15 1.7. My understanding is there you're also
16 referring to a single call when talking about how
17 de Castro would activate a second service.

18 Is that -- is that correct?

19 A. Yeah, I mean, this is the same call. I'm
20 not talking about different calls that the user is
21 making into the same application. It's still
22 the -- the call, one call. And so I think
23 that's -- I think that does sufficiently show how
24 de Castro discloses and renders obvious claim 1.

25 Q. When the user calls in -- this call that's

1 sort of being used as an example for multiple
2 elements of the claim here -- when the user calls
3 and is, you know, routed to a specific application
4 script, at what point does the activating take
5 place?

6 A. (Witness reviews document.) Well, I talk
7 about that at a few places in my declaration. For
8 example, if you look at paragraph 255, I'm saying
9 here that (as read):

10 "A POSITA would have understood that
11 registering a call ID of an incoming call and
12 starting an associated call actor for an app script
13 610 would include 'activating' the app script 610.
14 In this regard, registering the call ID and
15 starting the call actor allow command messages from
16 the customers to be queued, sent, and executed to
17 -- to control the call, thus 'activating' the
18 commands and components of the script for the
19 client 40 on the call."

20 And then I further talk in -- in 257 that
21 (as read):

22 "It would have been obvious to a POSITA
23 that the app server 200 would 'activate' app script
24 K."

25 For example (as read):

1 "...de Castro teaches that a Rayo client
2 uses the JID to direct commands from the
3 communication application to the user in the call."

4 And I go on there.

5 So I think -- I think at that point
6 when -- as I discuss here, when the user calls in
7 and there's a -- registering a call ID of an
8 incoming call and starting a call actor from -- for
9 an app script would include activating the -- the
10 app script.

11 Q. So it seems that in de Castro that app
12 script would be available for other users and they
13 may already have initiated a call and hung up.
14 That -- that app script has been set up for use in
15 de Castro's system previously; is that correct?

16 A. (Witness reviews document.) So if you
17 look at paragraph 124, it talks about (as read):

18 "A call manager 260 manages the
19 cooperation among the modules. When a call 1 is
20 received into the communication application server
21 200, the call manager register --" and there's a
22 typo there, but -- "register the call ID into a
23 call ID registry 262 and start a call actor 1
24 270-1, and similarly for call 2,..., and call i."

25 So every call has a new call actor

1 started. And I refer to -- I do cite paragraph 124
2 in various parts of my declaration, including in
3 232. There's -- you can do a search, but there's
4 about five or six references and citations to that
5 paragraph in my declaration.

6 Q. But in your declaration you -- I mean,
7 you -- you consider a single call and that call
8 actor being set up for a single call to be
9 activating the second service within the meaning of
10 the claim?

11 A. Yeah, it would be starting an associated
12 call actor for an app script would -- would include
13 the activating. So, yeah, I mean, every call has a
14 call actor started. That's what paragraph 124 is
15 saying.

16 So in the situation you described as
17 someone already called in, fine, but they have
18 their own call actor started. Someone else calls
19 in for the same application script, and there's
20 still another call actor started as a result. And
21 that starting the call actor for a script includes
22 activating the app script because it -- every --
23 every different call has a new call actor, had
24 their own call actor started. That's what
25 paragraph 124 is saying.

1 Q. So if the same user calls back again, it's
2 activated again? It's only activated during the
3 call itself? It's not an activation that persists?

4 A. Well, it -- it -- as claimed, nothing says
5 in -- I don't recall any language in the claim
6 about activating or persistent -- I don't think
7 they use the word persistent or -- is used in the
8 claim. So this -- this does meet -- so starting a
9 call actor or a script, it includes activating the
10 app script.

11 MR. STEPHENS: Okay. I have no further
12 questions on initial cross.

13 MR. GORYUNOV: All right. Let's take a
14 20-minute break.

15 VIDEO OPERATOR: Okay. We're going off
16 the record. The time is 1:56 p.m.

17 (Recess was taken.)

18 VIDEO OPERATOR: We are back on the
19 record. The time is 2:17 p.m.

20 MR. GORYUNOV: Excellent. Welcome back,
21 Doctor Houh. Thank you for your time today.

22 THE WITNESS: Thank you.

23 MR. GORYUNOV: We have no questions.
24 We'll close out and reserve the right to review.

25 VIDEO OPERATOR: If it's okay with

1 counsel, I'll close out the video record.

2 MR. GORYUNOV: Please.

3 VIDEO OPERATOR: We are off the record at
4 2:17 p.m. EST, and this concludes today's testimony
5 given by Dr. Henry Houh. The total number of media
6 units used was four and will be retained by
7 Veritext.

8 COURT REPORTER: And would you both care
9 for rough transcripts today?

10 MR. STEPHENS: Yes, please.

11 COURT REPORTER: And, Eugene, as well?

12 MR. GORYUNOV: No, thanks.

13 (Whereupon the deposition ended at
14 2:18 p.m.)

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1 DEPONENT'S ERRATA SHEET
2 AND SIGNATURE INSTRUCTIONS
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5 The original of the Errata Sheet has
6 been delivered to Eugene Goryunov, Esq.

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11 Esq., to whom the original deposition transcript
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CERTIFICATE OF REPORTER

I Patricia Jodi Ohnemus, Licensed Shorthand Reporter in and for the States of California and New Hampshire and Notary Public in and for the Commonwealth of Massachusetts, the officer before whom the proceedings were taken (remotely, do hereby certify that the foregoing transcript is a true and accurate record of these proceedings; that said proceedings were taken in stenotype note by me remotely on the 12th day of December, 2023, commencing at 10:33 a.m. (EST) and ending at 2:18 p.m. (EST).

I further certify that present on behalf of Petitioner Cisco Systems, Attorneys Eugene Goryunov and Brett Bostrom of Haynes & Boone LLP, and on behalf of Patent Owner Zilkr Cloud Technologies, LLC, Attorney Jeffrey Stephens of Carter Arnett.

I further certify that I am not related to nor associated with any of the parties or their attorneys, nor do I have any disqualifying interest, personal or financial, in the actions within.



2023.

Patricia Jodi Ohnemus, CRR, RPR, RMR

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ATTACH TO DEPOSITION OF: HENRY H. HOUEH, PhD
CASE: CISCO SYSTEMS VS. ZILKR CLOUD TECHNOLOGIES

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I have read the foregoing transcript of my deposition and except for any corrections or changes noted above, I hereby subscribe to the transcript as an accurate record of the statements made by me.

HENRY H. HOUEH, PhD

Subscribed and sworn to before me
this _____ day of _____, 2023.

Notary Public
My Commission Expires:

1 Eugene Goryunov - Eugene.goryunov@haynesboone.com

2 December 20, 2023

3 RE: Cisco Systems, Inc. v. Zilkr Cloud Technologies, LLC

4 DEPOSITION OF: Dr. Henry Houh (# 6328008)

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[& - 2a]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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