

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS INC.,

Petitioner,

v.

ZILKR CLOUD TECHNOLOGIES LLC,

Patent Owner.

IPR2023-00553

Patent No. 9,210,254

Tuesday, March 5, 2024

10:03 a.m. EST

REMOTE DEPOSITION OF VIJAY K. MADISETTI, PhD

(This proceeding was conducted via Zoom.

All participants appeared remotely.)

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Deanna J. Dean, RDR, CRR

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Tuesday, March 5, 2024

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10:03 a.m.

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Deposition of VIJAY K. MADISETTI, PhD,

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held via Zoom videoconference, before Deanna J.

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Dean, a Registered Diplomate Reporter, Certified

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Realtime Reporter, and licensed court reporter

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of the state of New Hampshire.

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A P P E A R A N C E S

Counsel for Petitioner:

HAYNES BOONE, LLP

180 N. LaSalle Street

Suite 2215

Chicago, IL 60601

(312) 216-1630

BY: EUGENE GORYUNOV, ESQ.

eugene.goryunov@haynesboone.com

HAYNES BOONE, LLP

6000 Headquarters Drive

Plano, TX 75024

(972) 739-6973

BY: BRETT BOSTROM, ESQ.

brett.bostrom@haynesboone.com

(All participants appeared remotely.)

* * *

1 A P P E A R A N C E S (cont'd.)

2

3 Counsel for Respondent:

4 CARTER ARNETT BENNETT & PEREZ PLLC

5 Campbell Centre II

6 8150 N. Central Expressway, Suite 500

7 Dallas, TX 75206

8 (214) 550-8188

9 BY: JEFF STEPHENS, ESQ.

10 jstephens@carterarnett.com

11

12 ALSO PRESENT:

13

14 BRAD BOWLING, ESQ.

15 Cadwell Clonts Reeder & Thomas LLP

16

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20 (All participants appeared remotely.)

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I N D E X

Examination	Page
VIJAY K. MADISETTI, PhD	
By Attorney Goryunov	7

E X H I B I T S

Number	Description	Page
Exhibit 2006	12/22/23 Declaration of Vijay Madisetti (previously marked)	8
Exhibit 1001	US Patent No. 9,210,254 (previously marked)	8
Exhibit 1028	5/20/13 Article Titled "AT&T Digital Life Launches In Seven Additional U.S. Markets"	39
Exhibit 1005	US Patent Application Publication 78 2007/0043687 A1 (Bodart, et al.) (previously marked)	78

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

2 THE REPORTER: Here begins the remote
3 deposition of Vijay Madisetti, taken in the
4 matter of Cisco Systems Inc., Petitioner, v.
5 Zilkr Cloud Technologies, LLC, Patent Owner,
6 pending in the United States Patent and
7 Trademark Office before the Patent Trial and
8 Appeal Board, Case No. IPR2023-00553.

9 Today's date is March 5, 2024. The time
10 is now 10:03 a.m. Eastern Daylight Time.

11 This deposition is being held remotely by
12 Zoom videoconferencing. I am the licensed
13 stenographic court reporter, Deanna Dean,
14 presenting on behalf of Henderson Legal
15 Services.

16 Will counsel please introduce themselves
17 and state whom they represent, beginning with
18 the party noticing the deposition.

19 ATTORNEY GORYUNOV: Good morning,
20 everybody. Eugene Goryunov, Haynes & Boone.

21 I'm joined by my colleague, Brett Bostrom.

22 ATTORNEY STEPHENS: I'm Jeff Stephens with
23 the law firm of Carter Arnett Bennett & Perez.

24 I am representing Zilkr Cloud Technologies
25 LLC.

1 VIJAY K. MADISETTI, PhD,
2 a witness called for examination, having been first
3 duly sworn according to law, was deposed and
4 testified as follows:

5 EXAMINATION

6 BY ATTORNEY GORYUNOV:

7 Q. Good morning, Dr. Madiseti.

8 A. **Good morning, sir.**

9 Q. Would you state your full name for the
10 record.

11 A. **It's Vijay K. Madiseti.**

12 Q. And just for the record, I am unable to
13 turn my camera on this morning because of various
14 connection issues.

15 I have discussed this issue with you,
16 Dr. Madiseti, and your counsel, Jeff Stephens. Is
17 that correct?

18 A. **Yes.**

19 Q. And you don't have any issues with me not
20 enabling my camera this morning. Is that okay?

21 A. **That's okay.**

22 Q. All right. Thank you.

23 Dr. Madiseti, you and I both know you've
24 been deposed many times before. Is that right?

25 A. **Yes.**

1 Q. And I think some of those times were by
2 me?

3 A. Yes.

4 Q. Excellent.
5 So it's fair to assume that you still
6 remember how these things are done?

7 A. I do.

8 Q. You're here to tell the truth and answer
9 my questions as presented. Correct?

10 A. Yes.

11 Q. And if you don't understand my question,
12 you'll ask me to clarify?

13 A. I will.

14 Q. And if you answer my question, it's fair
15 for me to understand that you understood and
16 appreciated my question. Is that correct?

17 A. Yes.

18 Q. All right. I'm going to make a couple of
19 exhibits available to you in the chat window.
20 Please let me know as you receive them.

21 I'm first making available what has been
22 previously marked as Exhibit 2006. And I'm also
23 going to make available to you what has been marked
24 as Exhibit 1001. And we'll start there.

25 Please let me know when you receive those

1 exhibits.

2 **A. Yes. I can see them. I am downloading**
3 **them.**

4 **Okay. I have downloaded them, counsel.**

5 Q. All right. Let's start here with what's
6 been previously marked as Exhibit 1001.

7 Can you please open that?

8 **A. Okay. Yeah, I have opened it.**

9 Q. Excellent.

10 Do you recognize what has been previously
11 marked as Exhibit 1001?

12 **A. Yes. It's the US Patent 9,210,254.**

13 Q. And is this the patent that you understand
14 is involved in this proceeding?

15 **A. Yes, it is the '254 patent.**

16 Q. Excellent.

17 And then in our conversation today, I'll
18 refer to it as the '254 patent. Is that okay?

19 **A. Yes.**

20 Q. Excellent.

21 Let's go to your -- the exhibit that I've
22 made available as Exhibit 2006.

23 **A. Yes. I've opened that.**

24 Q. Do you recognize this document?

25 **A. Yes. It's my declaration in this IPR.**

1 Q. Would you mind going to PDF page 73 for
2 me.

3 A. Yes.

4 Q. Is that your signature?

5 A. Yes, it is.

6 Q. And you signed this declaration on or
7 around December 22nd of last year?

8 A. That's right.

9 Q. All right. And then following your
10 signature, starting at PDF page 74, is Appendix A.
11 Do you see that?

12 A. Yes.

13 Q. That's a copy of your CV. Is that also
14 correct?

15 A. Yes.

16 Q. And is this CV still accurate?

17 A. It is accurate. I mean, it's recent.

18 There may be a couple of cases that may not have
19 been mentioned, but it should be reasonably
20 accurate.

21 Q. All right. Have you changed your CV in
22 any way to reflect any further work experience or
23 any further education?

24 A. I would have to look at this version.

25 There may be a couple of additional depositions

1 **since January -- since December. But just a**
2 **couple, I think.**

3 Q. Is there anything that comes to mind since
4 December, without you spending too much time
5 looking at the document?

6 A. I would have to think about it. I think
7 there was one deposition between 3D -- 3D
8 Solutions -- 3D user interfaces and Apple. I can
9 remember that. But that would be the only one I
10 can remember, but there may be one more.

11 Q. Sounds good.

12 A. Yeah.

13 Q. All right. Well, let's look at your
14 declaration. Let's go to your paragraph 36.

15 A. 36. Okay.

16 Q. This includes a recitation of your
17 understanding of the principles of claim
18 construction. Is that correct?

19 A. Based on what guidance I was provided by
20 the counsel.

21 Q. You're not providing any claim
22 construction positions in your declaration. Is
23 that correct?

24 A. I'm not offering any claim constructions.
25 I am applying just the terms of the claim as

1 **construed by the court or based on the plain and**
2 **ordinary meaning.**

3 Q. All right. How do you understand plain
4 and ordinary meaning, the concept of plain and
5 ordinary meaning?

6 A. Again, from a technical point of view, I
7 mean, this would be how the claim would be -- the
8 language of the claim would be interpreted by one
9 of ordinary skill in the art in light of the
10 specification and the patent.

11 Q. And all of this interpretation is as of
12 the time of invention. Correct?

13 A. By one of ordinary skill in the art, yes.

14 Q. Now, how do you understand the concept of
15 a person of ordinary skill in the art?

16 A. A person of ordinary skill in the art
17 would be someone who would be -- who would be
18 knowledgeable in the art at the time of the claimed
19 invention, understand the scope and content of the
20 prior art, and would understand -- would have the
21 necessary qualifications for a person of ordinary
22 skill in the art that are described in my
23 declaration.

24 Q. And we can agree that there are multiple
25 people out there who can be considered a person of

1 ordinary skill in the art with regard to the '254
2 patent. Right?

3 **A. Yes.**

4 Q. And it's quite possible that each one of
5 those persons of ordinary skill in the art with
6 regard to the '254 patent could have different
7 understandings of the same term recited in the
8 claims of the '254 patent?

9 **A. Again, it probably depends on the term.**
10 **It depends on what your question is specifically**
11 **asking.**

12 Q. Well, putting aside terms of art, which I
13 think we can agree would have some kind of set
14 definition, we're talking about a technical term in
15 a patent claim.

16 Is it possible that each one of the
17 multiple persons of ordinary skill in the art with
18 regard to the '254 patent could have a different
19 understanding of the same term?

20 **A. Again, it all depends on the term and how**
21 **it is used in the claims and how it is used in the**
22 **specification. I don't have a general answer.**

23 Q. All right. So let's quickly go to Exhibit
24 1001 and look at Claim 1.

25 **A. Okay.**

1 Q. Do you see the preamble of Claim 1? It
2 reads: "A telephone system comprising."

3 Do you see that?

4 A. I do.

5 Q. And then the very next limitation is "a
6 database."

7 Do you see that?

8 A. Yes.

9 Q. A PHOSITA would have understood what the
10 word "database" means. Correct?

11 A. Yes.

12 Q. Is it -- are there multiple different
13 kinds of databases?

14 A. There can be.

15 Q. Okay. So is it possible that one PHOSITA
16 would have one understanding of the word "database"
17 and another would have a different understanding of
18 the word "database"?

19 ATTORNEY STEPHENS: Objection. Form.

20 A. I mean, I would disagree. I mean,
21 database has a well-known meaning -- well-known
22 meaning in the art, and I would consider that
23 as a -- sort of if you are in computer science or
24 an engineer, electrical engineer, you would
25 understand what a database is.

1 Q. You would agree with me that there are
2 different types of databases. Right?

3 A. There can be different types of databases,
4 depending on the type of application or the type of
5 architecture you may be using. But -- but a
6 database is a database.

7 Q. Okay. So, then, a PHOSITA, a person of
8 ordinary skill in the art, when encountering the
9 term "database," would understand that a database
10 could encompass many different kinds of databases.
11 Is that correct?

12 A. The way I would characterize it, they can
13 be different types of databases, but a person of
14 ordinary skill in the art would understand what a
15 database is.

16 Q. So hearing the term "database" would
17 trigger in a person of ordinary skill's mind a
18 relational database, a centralized database, a
19 hierarchical database -- all of those different
20 kinds of databases. Is that correct?

21 A. I would say that there are different --
22 they are all databases and they have different
23 structures or architectures, but they are databases
24 as from the viewpoint of a POSITA.

25 Q. And if the -- so -- by the way, going

1 forward in our conversation, rather than saying
2 "person of ordinary skill in the art," are you okay
3 with just referring to this person as a PHOSITA?

4 **A. Yes.**

5 **Q. Okay.**

6 Again, when you hear the term "database,"
7 one PHOSITA may think object-oriented database. Is
8 that correct?

9 ATTORNEY STEPHENS: Objection. Form.

10 **A. I mean, again, I said that a database is a**
11 **database, and there could be different kinds of**
12 **databases. So I don't think the fact that it is an**
13 **object-oriented database or another kind of**
14 **database changes anything about the term "database"**
15 **itself.**

16 **Q. And if a PHOSITA -- if a first PHOSITA**
17 **upon hearing the term "database" thinks of a**
18 **relational database whereas a second PHOSITA thinks**
19 **of an object-oriented database, both PHOSITAs are**
20 **still correct: they are thinking of a database.**
21 **Is that correct?**

22 ATTORNEY STEPHENS: Objection. Form.

23 **A. I didn't understand your question,**
24 **counsel. As I said, those are examples of a**
25 **database.**

1 Q. So if one PHOSITA envisions a certain type
2 of database when encountered by the term
3 "database," and a different PHOSITA envisions a
4 different type of database when encountered by the
5 term "database," both PHOSITAs are still thinking
6 about a database. Right?

7 ATTORNEY STEPHENS: Objection. Form.

8 A. I would say that if you are talking about
9 examples of databases, a POSITA would still
10 understand they are databases. I'm not sure what
11 you mean by "type."

12 Q. That's actually exactly what I was asking.

13 A. Examples -- I am assuming you meant
14 examples of databases. They would be viewed by a
15 POSITA as examples of a database.

16 Q. All right. In your -- let's go back to
17 Exhibit 2006. Let's go to your paragraph 33.

18 A. 33. Okay.

19 Q. Here, you refer to the declaration of
20 Dr. Akl.

21 Do you see that?

22 A. I do.

23 Q. You say that you have expressed your
24 opinions using the same words as those that you
25 reviewed from Dr. Akl.

1 Do you see that?

2 A. That's not what I said. I said there may
3 be some instances where I've used similar language.

4 Q. Do you use the same words as you reviewed
5 from Dr. Akl?

6 A. As I said, there may be some language in
7 my declaration in some instances where there is
8 common language, given the large number of
9 declarations, reports, and opinions and other
10 briefs in this matter. There may be some instances
11 where some language or some words may overlap in
12 certain instances.

13 Q. All right. Does the overlap you just
14 mentioned include wholesale copying paragraphs from
15 Dr. Akl's declaration into yours?

16 A. I would call them as copying. I would say
17 that having read Dr. Akl's declaration, having
18 reviewed it and understood it from a technical
19 point of view, I felt that with a suitable
20 attribution, rather than change the language and
21 have it interpreted differently, it would reduce
22 any doubt or confusion by adopting certain similar
23 words. But the opinions in my declaration are my
24 own.

25 Q. Did you speak to Dr. Akl in preparing your

1 declaration?

2 **A. I did not.**

3 Q. Did you speak with any assistants of Dr.
4 Akl in preparing your declaration?

5 **A. I didn't.**

6 Q. Did you exchange any kind of
7 correspondence with Dr. Akl or any of his
8 assistants?

9 And by "correspondence," I mean emails,
10 texts, Skypes, whatever.

11 **A. No, to the best of my knowledge.**

12 Q. All right. And you've obviously read the
13 '254 patent in preparing for your deposition and
14 preparing your opinions. Correct?

15 **A. Yes.**

16 Q. And you read it cover to cover?

17 **A. I reviewed it, yes. I reviewed it many
18 times over the past few months. I reviewed again
19 before my deposition.**

20 Q. All right. Now, let's take a look at --
21 again, we're still in your declaration. Let's go
22 down to paragraph 43.

23 **A. Okay.**

24 Q. In paragraph 43, you express the level of
25 a PHOSITA that you believe is appropriate in this

1 case. Is that correct?

2 **A. Yes.**

3 Q. And in 44, paragraph 44, you excerpt
4 portions of Petitioner's characterization of what
5 would be a PHOSITA. Is that correct?

6 **A. Yes.**

7 Q. Take a look at both 43 and 44, and let me
8 know when you're ready.

9 **A. I'm ready.**

10 Q. Okay. In paragraph 44, Petitioner
11 suggests that a PHOSITA would have, in addition to
12 various degrees, two years of relevant experience
13 in telecommunications and networking.

14 This is in the third and fourth line of
15 your paragraph 44. Do you see that?

16 **A. I do.**

17 Q. Okay. When I review your paragraph 43, I
18 don't see your reference to any particular type of
19 experience or any term of work experience.

20 Was that intentional?

21 **A. I believe that there was some precedent in**
22 **earlier language in other briefs with respect to**
23 **that definition of a POSITA that I adopted to,**
24 **again, prevent any confusion. But I would**
25 **understand that two years would be a good example**

1 and representative of the experience I had in mind.

2 And my opinions apply under both parties'
3 constructions. I don't see any change.

4 Q. Let's go to your paragraph 47.

5 A. Yes, I'm on paragraph 47 on page 14.

6 Q. You begin by stating that the '254 patent
7 deals with telecommunications service providers.

8 Do you see that in the very first line?

9 A. Yes. I'm citing to column 1, lines 21
10 through 26.

11 Q. And then you go on in the next line to
12 discuss traditional analog telephone service.

13 Do you see that?

14 A. Where do you see that?

15 Q. Second line. The last four words.

16 A. Second line. The one that starts with
17 "The availability"?

18 Q. No, no. Sorry. Not sentence. The second
19 line.

20 A. Oh, I see. Second. Okay.

21 Q. Yeah. Sorry. Thanks for clarifying.

22 A. Yeah. So I'm looking at the first line,
23 first sentence, which says "According to the '254
24 patent" -- column 1, lines 21 through 26 --
25 "telecommunication service providers still have

1 **large number of customers with traditional analog**
2 **telephone service."**

3 **That's from the specification.**

4 Q. All right. What do you mean by
5 "traditional analog telephone service"?

6 A. I believe that in the context of the
7 disclosure in the '254, it talks about the
8 telephone number being a universal identifier for
9 communicating with the outside world.

10 Q. I understand that.

11 My question is the actual four words
12 "traditional analog telephone service." How do you
13 understand that?

14 Is that like a normal phone line in your
15 house from AT&T or whoever your local provider is,
16 or is there a different definition that you
17 understand to be contained within traditional
18 analog telephone service?

19 A. I did not understand the question.

20 Q. What part of the question do you not
21 understand?

22 A. Yeah, I'm not sure what you are asking,
23 counsel. I'm saying --

24 Q. I want to know what is a traditional
25 analog telephone service?

1 A. And that's what I was citing to a portion
2 of the specification, column 1 through -- 21
3 through 26. I believe that the specification is
4 describing something, for example, like a telephone
5 service that was offered by a telephone provider
6 such as AT&T or BellSouth.

7 Q. So, in other words, a plain old telephone
8 line? That's what you mean by traditional analog
9 telephone service. Is that correct?

10 ATTORNEY STEPHENS: Objection. Form.

11 A. Again, I'm not sure what you mean by a
12 line. I believe that a telephone service is
13 something that is provided by a telephone service
14 provider such as AT&T, Sprint, or BellSouth. So
15 it's a complete full service.

16 Q. All right. So we have the word "analog"
17 here. What would be the difference between analog
18 telephone service and a digital telephone service?

19 A. At a very high level, a lot of the
20 switching that takes place may be different. Some
21 of the speech codecs, some of the echo
22 cancellation, some of the aspects of the service as
23 offered by the carriers such as AT&T or BellSouth
24 would be different.

25 Q. Do you have a telephone service at your

1 home, sir?

2 **A. I only use the cellular network now.**

3 Q. I'm sorry. You had some fuzz on your
4 line. What did you say?

5 **A. I only use cellular service.**

6 Q. Would that be an example of a digital
7 telephone service?

8 **A. Again, we have not construed these terms.**
9 **I would say that a cellular service is accessing --**
10 **has a different architecture than a more**
11 **traditional type of service. So it all depends on**
12 **the context.**

13 Q. Well, you say that you understood the '254
14 patent when you reviewed it. Right?

15 **A. Yes.**

16 Q. I'm just looking for an example of a
17 traditional analog telephone service. Can you give
18 me one?

19 **A. I did.**

20 Q. Give me another one.

21 **A. I mean, that's all I have at this point.**
22 **A traditional analog telephone service would have**
23 **been something offered by somebody like AT&T or**
24 **BellSouth using analog switching, using different**
25 **types of speech codecs, different types of backend**

1 **technology.**

2 Q. All right. Well, so you mentioned AT&T.
3 You're aware that AT&T offers both cellular service
4 and home telephone service. Correct?

5 A. I am not sure what business AT&T is in and
6 it's not. But I know that it offers cellular
7 service and some forms of -- at some point some
8 forms of landline/land-based service as well.

9 Q. Okay. Landline or land-based services
10 that you just mentioned, are those examples of
11 traditional analog telephone services?

12 A. Again, I don't have an opinion on that
13 issue. All I'm saying is that telephone service
14 provider offers an entire phone service.

15 Q. Are you unable to answer my question?

16 A. I'm not sure what you're asking, counsel.
17 I said that someone like AT&T offers a full
18 telephone service that includes all aspects of
19 switching, all aspects of speech coding, directory
20 assistance, billing, providing different
21 subscriptions, LANs, and infrastructure.

22 Q. So a moment ago you testified that you
23 were aware that AT&T, and I quote, "at some point
24 offered some forms of landlines/land-based services
25 as well."

1 Are you unable to tell me if those
2 landline/land-based services from AT&T are examples
3 of traditional analog telephone services?

4 **A. A service that is offered and supported**
5 **and provided by AT&T through a landline can be an**
6 **example of a traditional analog telephone service.**

7 Q. Excellent. I'm not trying to be tricky
8 here.

9 All right. What goes into provisioning
10 that service?

11 Let me rephrase.

12 You named a number of components such as
13 different speech codecs, et cetera, that AT&T --
14 just using AT&T as an example -- would use to
15 provide a traditional analog telephone service.

16 What specific components are included in
17 providing this traditional analog telephone service
18 to customers?

19 **A. Typically a subscription plan, a billing**
20 **service; something that allows a customer to sign**
21 **up for that service; something that allows them to**
22 **choose a plan; something that allows them to**
23 **subscribe for certain features in addition to**
24 **providing activation of that service; and then the**
25 **ability to use that service later.**

1 Q. What about hardware equipment that would
2 be necessary for -- again, sticking with AT&T as
3 just an example -- to provide a traditional analog
4 telephone service?

5 A. As I said, you would need all these
6 features. You would need servers. You would need
7 switching equipment, all of them, to connect you to
8 a subscription service, to a billing service. A
9 service where you can sign on for various types of
10 features, sign on for the type of calls that you
11 would like to support.

12 Q. Have you ever worked with a telephone
13 company to design a system for providing
14 traditional analog -- excuse me -- traditional
15 analog telephone service?

16 A. The telephone service company provides the
17 service. I did not.

18 Q. Are you aware of the protocols that
19 telephone companies use to provide telephone
20 service to customers?

21 A. I mean, you seem to be using the word
22 "provide" over and over again. So what does
23 "provide" mean?

24 There's a different term called
25 "provisioning," which I do not equate to "provide."

1 Q. We'll get there later.

2 I'm asking you a simple question of are
3 you aware of the protocols that a telephone company
4 uses to provide service to a customer?

5 A. There are different types of subscription
6 protocols, billing protocols. Protocols to carry
7 media. Protocols to carry control information.

8 Q. Do you have some examples that you're
9 aware of protocols that do this?

10 A. There are many protocols covering by --
11 covered by different standards. For example, for
12 billing there may be ISO standardized protocols,
13 subscription plans again. There are a number of
14 ways of signing up for them and adding features for
15 media. There are a number of, again, technical
16 standards for carrying and formatting the different
17 media and control signals.

18 Q. And we can agree that the protocols used
19 to provide traditional analog service would be
20 different than those used to provide digital
21 telephone service. Right?

22 A. I think this is more overlap, and -- so I
23 believe that it's more an evolution. And there's a
24 lot of overlap and [indiscernible].

25 THE REPORTER: I'm sorry. Could you

1 repeat that, what you just said.

2 A. There's a lot of overlap and it was more
3 evolutionary. So many of these protocols for both
4 billing as well as for subscriptions, for
5 maintenance, for adding new features, all these are
6 very similar.

7 Q. Similar, but not the same. Right?

8 A. Again, I would say they are very similar.

9 Q. Well, they're not the same. Right?

10 A. I don't have an opinion on that, because
11 that's a very broad diffuse term. But I would say
12 they are very similar if not the same.

13 Q. In the cellular telephone service context,
14 there is a concept of roaming. You're aware of
15 that; right?

16 A. Yes.

17 Q. There's no such thing as roaming when
18 you're talking about a landline or land-based
19 telephone service. Right?

20 A. Again, it all depends on the type of
21 architecture. There may be roaming plans even for
22 other types of architectures.

23 Q. How do you understand the concept of
24 roaming in connection with a cellular phone
25 service, sir?

1 ATTORNEY STEPHENS: Objection. Relevance.

2 **A. As I said, in certain contexts, it all**
3 **depends on what roaming means. And if the ability**
4 **is to move from one jurisdiction to another or one**
5 **location to another, there are similar concepts**
6 **across different types of systems.**

7 Q. Okay. So let's run with your
8 understanding of roaming to include the ability to
9 move from one jurisdiction to another or one
10 location to another.

11 Can we have that in mind for our next
12 conversation?

13 **A. Okay.**

14 Q. Okay. With this understanding of roaming,
15 how would you roam in this way that you and I have
16 just discussed when we are talking about land-based
17 or landline telephone service?

18 **A. I have not thought about that issue in**
19 **detail. I didn't discuss that in my declaration.**

20 Q. Do you not know?

21 **A. As I said, it all depends on what these**
22 **things mean in different contexts. They may mean**
23 **different things in different contexts.**

24 Q. We just agreed on a definition, sir. So
25 I'm asking you to apply that definition.

1 **A. As I said, I don't have that in my**
2 **declaration. I don't want to say something new**
3 **that I haven't thought about careful.**

4 Q. So you're unable to give me an answer to
5 my question. Is that correct?

6 **A. Because it's not in my declaration. It is**
7 **not an opinion that is present in my declaration.**

8 Q. You are aware that I am allowed to explore
9 your general knowledge. Right?

10 **A. Again, I'm not sure of what you're asking.**
11 **It's not part of my opinions or in my declaration.**
12 **So --**

13 Q. So you are unable to answer any questions
14 that are outside the four corners of your
15 declaration. Is that correct, sir?

16 **A. What I said is that I don't want to**
17 **speculate about terms that I have not thought**
18 **about.**

19 Q. Okay. So you just don't know?

20 **A. I said I don't want to speculate or guess**
21 **without knowing specifically the context or what**
22 **specifically is the metes and boundaries of those**
23 **questions and terms.**

24 Q. Well, again, I'm -- I was under the
25 expression that you and I agreed with an

1 understanding of the term "roaming."

2 I could read it back to you. Would that
3 help?

4 **A. As I said, counsel, that's not something I**
5 **considered in this context as to how roaming could**
6 **be implemented in different ways. I don't have --**

7 Q. So then you're unable to answer my
8 question?

9 **A. As I said, it's not something I thought**
10 **about in detail, something I don't want to**
11 **speculate.**

12 Q. So you're unable to answer my question?

13 **A. I'm not able to answer your question**
14 **because I do not want to speculate on matters that**
15 **are not in my declaration or something that I**
16 **haven't thought about.**

17 Q. Okay. You mentioned earlier in the
18 context of explaining protocols that -- again,
19 sticking with AT&T as our example -- that they use
20 protocols for billing and subscription.

21 Do you remember that conversation?

22 **A. Yes.**

23 Q. Are there any other protocols that AT&T,
24 again, as an example, uses to establish a call,
25 tear down the call, and so on?

1 **A. I believe that there are different types**
2 **of protocols, and different protocols have**
3 **different -- different areas of application. I**
4 **don't remember the specific versions.**

5 Q. Let me try it this way.

6 Do you -- at some point have you had a
7 landline or land-based telephone service at your
8 home?

9 ATTORNEY STEPHENS: Objection. Relevance.

10 **A. I was provided at some point by BellSouth,**
11 **I believe. Telephone service by BellSouth.**

12 Q. And you had a telephone unit somewhere at
13 your house that would ring when somebody would call
14 you. Is that correct?

15 ATTORNEY STEPHENS: Objection. Relevance.

16 **A. When I had the BellSouth telephone service**
17 **provided to me, I had a telephone at home that**
18 **could receive a phone call.**

19 Q. And when you had this BellSouth telephone
20 service that was provided to you, did you own your
21 home telephone units or did BellSouth?

22 ATTORNEY STEPHENS: Objection. Relevance.

23 **A. I believe I owned my cell -- my**
24 **telephones.**

25 Q. Are you aware of the process that a

1 telephone company uses to cause your home phone to
2 ring?

3 **A. I believe that they -- that the phone**
4 **service, the telephone service provider can send**
5 **certain signals that can cause your telephone to**
6 **ring.**

7 Q. And these signals are from some standard
8 protocol that is used by telephone companies. Is
9 that correct?

10 **A. The telephone service provider uses**
11 **certain protocols, I believe, to cause your**
12 **telephone to ring.**

13 Q. And your home phone's device, the actual
14 devices, telephone devices that you have at your
15 home, they are designed to receive those signals
16 and respond to them by ringing. Right?

17 **A. The phones will ring if the telephone**
18 **service provider sends a signal for them to ring.**

19 Q. And the signal that causes a phone to ring
20 is a standard signal that is implemented in home
21 telephones. Correct? Because without
22 standardization, you know, the -- it would be very
23 difficult to create a home unit that would ring all
24 the time when a service provider wants it to ring.
25 Correct?

1 ATTORNEY STEPHENS: Objection. Form.

2 **A. I would say that a telephone service**
3 **provider uses a protocol that would cause the**
4 **telephone at home -- that would be received by the**
5 **phone, the telephone at home, and it would ring as**
6 **a result of receiving that signal from the**
7 **telephone service provider.**

8 Q. What other kinds of signaling can a
9 telephone company send to a at-home telephone unit?

10 **A. It could send, for example, a dial tone.**

11 Q. What else?

12 **A. It could send things like a busy signal.**

13 Q. Would it send a signal to disconnect a
14 telephone call that is in progress?

15 **A. What do you mean by that?**

16 Q. I'll give you an example. I call you and
17 you pick up my phone call on your landline
18 land-based telephone unit.

19 Okay? So far so good?

20 **A. Okay.**

21 Q. You and I have a wonderful conversation,
22 and then our conversation comes to a conclusion and
23 one of us hangs up the phone.

24 Are you with me?

25 **A. Yes.**

1 Q. Okay. Let's assume you are the one to
2 hang up the phone. Does your telephone service
3 provider send a signal indicating that our
4 conversation or the call has concluded?

5 A. I don't recall specifically under which
6 scenarios it could be done.

7 Q. What about Caller ID? You're aware of
8 what that is; right?

9 A. Yes.

10 Q. Would Caller ID be one of those signals
11 that you discussed as being sent by a telephone
12 provider?

13 A. A telephone provider could send the Caller
14 ID as a part of the signaling it sends.

15 Q. What about conference calling or three-way
16 calling? Would those be signals that a telephone
17 provider could send to the caller?

18 A. I'm not sure if they are sent to the
19 caller, but I don't recall specifically how it
20 would be done.

21 Q. Would you agree with me that conference
22 calling and three-way calling are controlled by
23 telephone service provider signaling?

24 A. The telephone service provider can support
25 conference calling. That's all I can say.

1 Q. Are you aware of home automation products
2 from companies like AT&T?

3 A. You said home automation?

4 Q. Yes, sir. Home automation.

5 A. Like what?

6 Q. Cameras, for example. Remote camera
7 viewing.

8 A. No, I'm not.

9 Q. You're not aware of such solutions or
10 you're not aware of those solutions being provided
11 by AT&T?

12 A. As I said, I'm not aware of those specific
13 type of solutions.

14 Q. Are you aware of the Ring security system?
15 I think it's provided by Amazon these days.

16 A. The Ring security system, the camera
17 system? Yes, I'm familiar with the Ring camera
18 system.

19 Q. Okay. Are you aware that Ring also
20 provides a security system?

21 A. I don't know specifically what areas of
22 business they are in, but I am familiar with their
23 camera system.

24 Q. Are you aware of equipment that you can
25 install in your house that would automate certain

1 home features such as lighting?

2 **A. Again, these are very broad general**
3 **questions, counsel. I'm not sure what you're**
4 **asking.**

5 Q. I can read my question back to you.
6 Do you not understand my question, sir?

7 **A. I did not.**

8 Q. Okay. Are you aware of equipment that you
9 can install in your home that would automate
10 certain home features such as lighting?

11 **A. You mean a dimmer switch of some kind in**
12 **your wall or -- I'm not sure what you're asking.**
13 **You can put it --**

14 Q. Let me try it differently.

15 **A. You could put a dimmer on your switch and**
16 **then you could turn it and dim your lights.**

17 Q. I could also install a switch that I can
18 control from an app on my telephone. Right?

19 **A. You will be connecting to that switch over**
20 **an app or an internet connection? Is that what**
21 **you're saying? Or Bluetooth or something?**

22 Q. Yes.

23 Are you aware of solutions like that?

24 **A. Yes. You could probably connect over the**
25 **internet and you could open your garage door or you**

1 **could turn on the lights.**

2 Q. All right. And you're aware of smart
3 thermostats as well, such as like the Nest
4 thermostat. Correct?

5 A. **Yes. They can be again controlled over**
6 **the internet, and they would use this over-the-top**
7 **type of connections over the internet.**

8 Q. And you could schedule the smart
9 thermostat such as Nest to keep a certain
10 temperature during the day and a different
11 temperature at night. Correct?

12 A. **The user can do that, yes.**

13 Q. Would you consider that a type of home
14 automation?

15 A. **The user can set up some certain types**
16 **of -- the user or the resident of the home can set**
17 **up automation.**

18 Q. I'm going to share with you what I would
19 like to mark as new exhibit 1028.

20 (Madiseti Exhibit 1028 marked for
21 identification.)

22 Q. I would like you to give me a second here
23 so that I can make sure I pull up the right
24 document.

25 Do you see the document that I have marked

1 as Exhibit 1028?

2 **A. Yes, I'm downloading that.**

3 Q. Please let me know when you have it and
4 when you are ready.

5 **A. Okay.**

6 Q. If you could do me a favor and go to the
7 second page of it.

8 I'm sorry. I take that back. Let's start
9 on page 1. Sorry about that.

10 You agree with me that this article is
11 talking about AT&T Digital Life?

12 Do you see that? That's part of the
13 title?

14 **A. The document is titled "AT&T Digital Life**
15 **Launches in Seven Additional US Markets."**

16 Q. And if you go a little bit down, you can
17 see that this article was published on May 20th of
18 2013.

19 Do you see that?

20 **A. Where do you see that?**

21 Q. The first sentence of the article begins
22 with Dallas, May 20, 2013/PRNewswire/.

23 Do you see that?

24 **A. Oh, I see it. So I see that it states**
25 **here Dallas, May 20, 2013, but I don't have**

1 independent confirmation as to this date. We can
2 see that --

3 Q. That's fine.

4 A. -- that it describes and puts a certain
5 date, but I'm not -- I don't see that -- I mean, in
6 other words, I don't really know the date of this
7 document.

8 Q. Okay. But you see what the document says.
9 Correct?

10 A. Yes.

11 Q. It says what it says. Right?

12 A. Yes.

13 Q. Okay. All right.

14 Now, in that first paragraph, let's take a
15 look at the second sentence. It's the one that
16 begins with "Digital Life," and I'll read it for
17 you: "Digital Life offers security, convenience,
18 and peace of mind, in a customizable and
19 easy-to-use experience from smartphones, tablets,
20 or PCs."

21 Do you see that?

22 A. Where are you reading from?

23 Q. First paragraph, sir, the one we just
24 started. The last sentence.

25 A. Oh. On page 2, you mean?

1 Q. No. Page 1. Page 1.

2 A. Oh, I see. The last sentence of the first
3 paragraph?

4 Q. Yes, sir.

5 A. Okay.

6 Q. Have you ever heard of AT&T's Digital Life
7 product?

8 A. No.

9 Q. Let's go to page 2, please.

10 A. Okay.

11 Q. I'd say right in the middle of the page,
12 there's a sentence that says "Customers who select
13 Smart Security can add these automation packages,"
14 colon.

15 Do you see that sentence? It's in the
16 middle of the page.

17 A. Okay. I can see that sentence on page 2.

18 Q. And then the second bullet point is
19 "Energy Package."

20 Do you see that?

21 A. Yes.

22 Q. And the explanation of what is an energy
23 package is: "Control appliances, lighting, and
24 thermostats for convenience and energy efficiency
25 for an additional \$4.99 a month plus equipment and

1 installation."

2 Do you see that?

3 **A. Yes. You are reading from -- you are**
4 **reading from the document, yes.**

5 **Q. Yes, sir.**

6 Controlling lighting and thermostats is
7 similar to the Nest thermostat automation that you
8 and I discussed earlier. Is that correct?

9 **A. At a high level, yes, you are controlling**
10 **your thermostat. But, again, as I say, this is a**
11 **marketing brochure.**

12 **Q. Right.**

13 Before we move on, I do have another
14 question for you. Again, you mentioned earlier
15 that at some point you had a Southwest Bell
16 telephone service. Is that correct?

17 **A. BellSouth, I believe.**

18 **Q. I'm sorry. BellSouth. I apologize.**

19 Do you recall how you paid for that
20 service? In other words, was it from a bank
21 account, was it a credit card charge, or did you
22 send them a check every month?

23 ATTORNEY STEPHENS: Objection. Relevance.

24 **A. I don't remember. This was more than 30**
25 **years ago. It would probably be a check, but I**

1 **don't remember. Were credit cards around at that**
2 **time?**

3 Q. I'm like you. I don't have a home
4 telephone. It's all cellular for my family.

5 Okay. So you obviously have a cellular
6 phone. Correct?

7 **A. Yes.**

8 Q. Do you mind if I ask you who your provider
9 is?

10 **A. It's T-Mobile.**

11 Q. T-Mobile.

12 How do you pay for your service? Do you
13 send them a check, do you use a credit card charge,
14 or do they do a bank draw?

15 **A. It's a -- I believe it's auto-payment**
16 **through a bank account or a credit card, one of**
17 **those. I don't remember which one.**

18 Q. And your payment information is stored
19 somewhere with T-Mobile so that they can do the
20 auto-pay for you. Correct?

21 **A. The payment information, yes.**

22 Q. And T-Mobile also stores information about
23 your email address. Right?

24 **A. Email address?**

25 Q. Yes.

1 **A. I don't know what they do.**

2 Q. Have you ever received advertising
3 materials from T-Mobile via email?

4 **A. I think so, but I'm not sure if -- which**
5 **email they're using.**

6 Q. In connection with your cellular service
7 from T-Mobile, have you received an electronic copy
8 of your bill or a notice that your monthly charge
9 is due or a notice that your monthly payment has
10 posted, via email?

11 ATTORNEY STEPHENS: Objection. Form.

12 **A. I don't remember. I don't think I do, but**
13 **I don't even know how they -- I don't think they**
14 **inform me at all.**

15 Q. So auto-pay with T-Mobile is very
16 seamless, and no additional emails are sent to you
17 as best you can recall?

18 **A. I don't recall what -- I mean, I remember**
19 **receiving commercials and all that, but I don't**
20 **recall if they were in connection with my service**
21 **or not. But I don't remember.**

22 Q. Gotcha.

23 All right. We've been going for about an
24 hour. Let's take a 10-minute break. Is that okay?

25 **A. Yeah. Sounds good.**

1 Q. Sounds good.

2 ATTORNEY GORYUNOV: Jeff, I assume that's
3 okay with you?

4 ATTORNEY STEPHENS: Yes.

5 ATTORNEY GORYUNOV: Excellent.

6 Let's just be back at -- whatever -- 10:15
7 Central and 11:15 Eastern.

8 THE WITNESS: Sounds good.

9 ATTORNEY GORYUNOV: Thank you.

10 THE REPORTER: Off the record at
11 11:07 a.m.

12 (Recess taken from 11:07 a.m.
13 to 11:19 a.m.)

14 THE REPORTER: Back on the record at
15 11:20.

16 ATTORNEY STEPHENS: I just wanted to
17 object to Exhibit 1028 as outside the scope.

18 BY ATTORNEY GORYUNOV:

19 Q. Dr. Madisetti, welcome back.

20 During break did you discuss your
21 testimony with counsel?

22 A. I didn't speak with anybody, including the
23 counsel.

24 Q. All right.

25 Have you ever used an instant messaging

1 service?

2 **A. Recently, WhatsApp.**

3 Q. Have you ever used other instant messaging
4 services like Telegram, or, back in the day,
5 America Online chatter?

6 **A. No, I did not. Only recently, last two,**
7 **three years, I've been using -- maybe four years --**
8 **WhatsApp and Telegram to some degree.**

9 Q. Obviously, you use email all the time.
10 Right?

11 **A. I use email, yes.**

12 Q. When was the first time that you sent or
13 received an email? And I realize that I'm asking
14 you to go back into antiquity.

15 ATTORNEY STEPHENS: Objection. Relevance.

16 **A. I think it was more than 30 years, 35**
17 **years ago. Maybe around that time frame.**

18 Q. Was this email address from 30 years ago,
19 35 years ago, something provided by your university
20 or by your employer? Do you recall?

21 ATTORNEY STEPHENS: Objection. Relevance.

22 **A. I believe I chose my own identifier.**

23 Q. Your email address had a username and
24 password. Right?

25 **A. Yes.**

1 Q. And you needed to provide or input that
2 username and password before you could use your
3 email service. Correct?

4 ATTORNEY STEPHENS: Objection. Relevance.

5 A. I mean, I don't recall the provider or
6 anything. I would simply say, to access my email,
7 I used my user ID and password. And the email was
8 already present. By entering my email and
9 password, I did not provision my email. I did not.
10 I was just accessing my email.

11 Q. Right. That's not my question, sir.

12 Right now I'm just focusing on access,
13 getting into your email to receive and send emails.
14 So let me try my question again.

15 A. Okay.

16 Q. 30 to 35 years ago, in order to gain
17 access to your email address, you needed to input
18 your username and password into a computer or a
19 device that would then access your email service.
20 Is that correct?

21 ATTORNEY STEPHENS: Objection. Form.

22 A. The way I would state that is I accessed
23 my email by providing an email identifier and a
24 password.

25 Q. And you provided this email identifier and

1 password to what?

2 ATTORNEY STEPHENS: Objection. Form.

3 **A. To an application.**

4 Q. So you inputted your user name ident --
5 sorry -- your email identifier and password into an
6 application on your computer. Correct?

7 **A. Yes.**

8 ATTORNEY STEPHENS: Objection. Relevance.

9 Q. And the application on your computer
10 utilized that information to log in to the remote
11 server and get you access to your email. Correct?

12 **A. Again, I would say that I accessed my**
13 **email using my user ID and password.**

14 Q. And same question regarding WhatsApp.

15 Actually, you know what? Sorry. Still
16 sticking on email.

17 Do you know what the application on your
18 computer did with your email identifier and
19 password once you inputted it into the application?

20 **A. I believe it would access my email.**

21 Q. Did it send -- "it" being the application
22 on your computer -- let me clean that up a little
23 bit.

24 The email application on your computer,
25 did it send your email identifier and password to

1 the remote email server?

2 **A. I don't believe it did. It just accessed**
3 **it -- it accessed my email that was stored locally.**

4 Q. Did the software application on your
5 computer access emails that were not stored locally
6 on your machine?

7 **A. In those days, I believe it was stored**
8 **locally.**

9 Q. So what would happen if you received an
10 email at your email address? In other words, how
11 would you cause the application on your computer to
12 synchronize your email inbox with the remote
13 server?

14 **A. I don't know the specific details,**
15 **counsel.**

16 Q. Okay. Let's fast-forward to more modern
17 times: 2013, 2012 time frame.

18 Are you there with me?

19 **A. Yes.**

20 Q. Okay. If you were to receive an email at
21 a server, how would you access that email from your
22 computer?

23 **A. It all depends on the email protocols and**
24 **all that. I don't remember specifically. All I**
25 **can say is that I have to be accessing my email**

1 that was already provisioned by something else, so
2 it was just accessing it with my user ID and
3 password.

4 Q. So the email address that you would be
5 accessing was previously provisioned on your
6 device. Correct?

7 A. No. I would have to sign up for a
8 subscription to Gmail or Yahoo Mail or have to
9 create an account. I would have to be provided
10 with a username and a password, and that's
11 provisioning. After that, I am just accessing it.

12 So I have to contact Gmail, which is
13 Google, or Yahoo Mail, which is Yahoo, and then I
14 would get -- set up an account, subscribe to
15 various features -- for example, the amount of
16 storage and all that -- and then I would be getting
17 a user ID and a password that I could then use to
18 access my email.

19 And so the first part of that is
20 provisioning. The accessing is just accessing,
21 which is not provisioning.

22 Q. Okay. So let me ask you this. Let's
23 assume for the moment that you have two computers
24 at home.

25 Okay? So far so good?

1 **A. Yeah.**

2 Q. Okay. You use Computer No. 1 to sign up
3 for a brand-new Gmail email account.

4 So far so good?

5 **A. Yes.**

6 Q. Your use of Computer No. 1 to set up a
7 brand-new Gmail account is what you understand to
8 be provisioning. Correct?

9 **A. Yes. I signed up for a new subscription,**
10 **got an account, an identifier and a password and**
11 **all that.**

12 Q. Now, a week later you go to your Computer
13 No. 2.

14 So far so good?

15 **A. Yes.**

16 Q. Computer No. 2 has never before accessed
17 your new Gmail account. Okay?

18 **A. Okay.**

19 Q. You would like to use Computer No. 2 to
20 gain access to your brand-new Gmail account.

21 So far so good?

22 **A. Yes.**

23 Q. When you use a new device to access your
24 existing brand-new Gmail account, you don't see
25 that as provisioning?

1 **A. It's not. It's just accessing. There's**
2 **no new account created. There is no new**
3 **subscription plan. It's the same old same old.**

4 **Q. But it's being used on a different device.**

5 **A. That doesn't matter. You are still**
6 **accessing your own email. You are accessing using**
7 **the same user ID that was provisioned before. You**
8 **are accessing it using the same password. It is**
9 **just access, or use. It's not provisioning.**

10 **Q. Okay. Let's take a look at the -- sir --**
11 **I'm sorry.**

12 Do you have an iPhone or an Android
13 device?

14 ATTORNEY STEPHENS: Objection. Relevance.

15 **A. I use Android. I do have an iPhone, but I**
16 **use the Android.**

17 **Q. You do have an iPhone. You're aware of an**
18 **app on the iPhone called iTunes. Right?**

19 **A. Yes.**

20 **Q. So when you bought your iPhone, the one**
21 **that you currently have, was that your first**
22 **iPhone?**

23 ATTORNEY STEPHENS: Objection. Relevance.

24 **A. No.**

25 **Q. When you bought your very first iPhone, do**

1 you recall the process where Apple made you create
2 an Apple ID and password?

3 ATTORNEY STEPHENS: Objection. Relevance.

4 A. Yes, I remember. Again I don't remember
5 with the first iPhone and all that, but I do
6 remember the Apple ID.

7 Q. Okay. And when you created an Apple ID --

8 A. I don't remember when. It may have been
9 recently.

10 Q. Okay. When you created your Apple ID, you
11 received access to the iTunes app?

12 A. I never used iTunes, but --

13 ATTORNEY STEPHENS: Object to form.
14 Relevance.

15 A. Yeah. I don't believe I used iTunes, but
16 I did -- I was -- I created an Apple ID.

17 Q. Okay.

18 A. And I later used on my device.

19 Q. And you've had the same Apple ID on
20 multiple iPhones. Correct?

21 A. Yes.

22 ATTORNEY STEPHENS: Objection. Relevance.

23 Q. When you first create an Apple ID with
24 Apple, I will represent to you that they give you
25 access to their iTunes software.

1 Can we at least agree on that part?

2 **A. I don't know, counsel.**

3 Q. Okay. All right. Let's go take a look at
4 your paragraph 93 in your declaration.

5 **A. Okay.**

6 Q. All right. Do you see in your
7 paragraph 93 you refer to the Telecommunications
8 Industry Association, TIA?

9 **A. I do.**

10 Q. And do you see -- and you provide here a
11 definition of the term "provisioning."

12 Do you see that?

13 **A. Yes. I state here that the TIA, which is**
14 **the Telecom -- Telecommunications Industry**
15 **Association, defines "provisioning" as follows.**

16 Q. "The act of acquiring telecommunications
17 service from the subscription of the requirement
18 through the activation of service."

19 Did I read that correctly?

20 **A. Yes.**

21 Q. Okay. So with the TIA standard in mind,
22 here's a question I have for you.

23 As you said, you have T-Mobile. Right?

24 **A. Yes.**

25 Q. And you have service with T-Mobile right

1 now on the device that you have somewhere in your
2 possession. Correct?

3 ATTORNEY STEPHENS: Objection. Relevance.

4 **A. They are the carrier for the -- they are**
5 **the cellular service provider for my Android phone.**

6 Q. Right. So your Android phone has access
7 to T-Mobile's network, and you can make and receive
8 phone calls on it. Correct?

9 ATTORNEY STEPHENS: Objection. Relevance.

10 **A. I can because T-Mobile provisioned my**
11 **service when I signed up for them and signed on to**
12 **a subscription plan.**

13 Q. All right. Let's assume that tonight your
14 Android phone stops working. Okay?

15 **A. Okay.**

16 Q. You call T-Mobile and they graciously send
17 you a brand-new one. Okay?

18 **A. Okay.**

19 Q. In order to use the brand-new cell phone
20 that T-Mobile has sent to you, with T-Mobile's
21 network, you have to provision that cell phone to
22 work with T-Mobile. Is that correct?

23 **A. No. It's logging into my existing**
24 **service, service plan. I change phones all the**
25 **time. They all are accessing my already**

1 **provisioned T-Mobile service -- T-Mobile service.**

2 Q. Are you distinguishing provisioning a
3 service -- I'm sorry. Let me try this again.

4 Are you -- it seems to me that you're
5 saying that provisioning is something that takes
6 place from the server side; in other words,
7 creating a brand-new account. Correct?

8 A. Or a subscription. Or a subscription by
9 the service provider. The service provider is
10 creating an account for you, gives you a phone
11 number, assigns you a service plan, and says you
12 have the ability to make so much downloads, so much
13 data, so much capabilities, so many features. So
14 they give you a subscription plan and a phone
15 number and things like that.

16 Q. So when you obtain a new device for use
17 with your existing cellular service, you do not
18 believe that that device has to be provisioned in
19 order to work with T-Mobile's network. Is that
20 correct?

21 A. My understanding as used in the -- in
22 the -- in this particular legal matter,
23 provisioning by -- provisioning of the service by a
24 provider means that when you get a new phone, all
25 you're doing is you are accessing an existing

1 **service. It's not provisioning a new service.**

2 Q. But you're provisioning a new device to
3 work with the service. Right?

4 A. **No.**

5 Q. All right. You're aware that T-Mobile
6 uses the GSM network. Correct?

7 A. **At a high level, yes.**

8 Q. So does AT&T?

9 A. **Yes.**

10 Q. But access to the AT&T network is
11 different than access to the T-Mobile network.
12 Right?

13 ATTORNEY STEPHENS: Objection. Form.

14 A. **I'm not sure what you're asking, counsel.**
15 **We are just accessing a service and --**

16 Q. Well, your T-Mobile telephone cannot
17 access AT&T's network unless you actively roam onto
18 AT&T's network. Right?

19 A. **Again, I don't have an opinion on that,**
20 **counsel. I believe that I can access all the**
21 **service providers using my T-Mobile account. Once**
22 **I create the T-Mobile account, it has agreements**
23 **with other service providers. And so when I sign**
24 **up for a T-Mobile subscription, it allows me to**
25 **access other networks.**

1 Q. If you go into your T-Mobile account and
2 you decide to update your T-Mobile subscription by
3 adding a service, is that provisioning?

4 A. For example, if I changed my plan from one
5 particular type of cellular plan to another one, a
6 few years ago, if you changed from one particular
7 plan to another plan as an example, or you are
8 adding some new subscription features, that would
9 be provisioning, an example of provisioning.

10 Q. Okay.

11 A. But just accessing your existing
12 subscription from a new device is not provisioning.
13 It's just accessing.

14 And the patent, '254 patent makes it very
15 clear that --

16 Q. Well, you rely on the TIA specification.
17 Correct?

18 A. That's additional support that can --

19 Q. The TIA specification is not cited in the
20 '254 patent. Right?

21 A. One of ordinary skill in the art would be
22 familiar with the TIA specification, and it's
23 consistent with the language in the -- in the '254
24 patent itself, for example, columns three and four
25 that I cite, which distinguish --

1 Q. All right.

2 A. Which distinguish between provisioning and
3 access.

4 Q. What if you subscribe to a new service?
5 Okay? You add a service to your existing cell
6 phone service. Per our conversation, you would say
7 that that is provisioning because you have added a
8 new service. Correct?

9 A. Again, at a very high level, based on your
10 very high level description, if you are adding a
11 new subscription or adding a new type of service,
12 you are provisioning.

13 Q. What if you then deactivate that new
14 service? Have you un-provisioned your service, or
15 what term would you use for that?

16 A. That would still be some sort of
17 provisioning if you were deactivating some
18 features. That's also a new type of subscription.

19 Q. Okay. And then if you were to decide to
20 add that service back to your account, that would
21 be provisioning again. Correct?

22 A. Yes.

23 ATTORNEY STEPHENS: Objection. Form.

24 A. With your high-level example, if you are
25 provisioning and adding a subscription and

1 **modifying it, that would be an example of**
2 **provisioning.**

3 Q. Let me give you another example.

4 With AT&T -- so I have AT&T service. I've
5 had it for 30 years at this point. When I go
6 abroad, I have the option of roaming on some AT&T
7 partner network or I can purchase AT&T's
8 international roaming plan.

9 Do you understand my description of how
10 AT&T works?

11 A. **I'm not sure what you are saying, but if**
12 **you -- if you're subscribing to something new that**
13 **is not part of your existing subscription, that**
14 **would be an example of provision.**

15 Q. Okay. So I come back from my
16 international trip and I call AT&T and I say, hey,
17 I no longer need this international roaming
18 service. I have removed it. I have disabled a new
19 service. As you and I have discussed, that process
20 of enabling would be provisioning as well.
21 Correct?

22 ATTORNEY STEPHENS: Objection. Form.

23 A. **At a high level, yes. You are changing**
24 **your subscription.**

25 Q. Can provisioning include adding an instant

1 messaging service to your device?

2 **A. As I said, I don't have the full details.**
3 **It has to be something that is subscription to a**
4 **service and offered by a service provider. So you**
5 **have to select it and subscribe it, and create a**
6 **subscription plan and get a user account, create a**
7 **user account and a password.**

8 **Q. All right. So, again, you have your**
9 **device. You decide from your device to subscribe**
10 **to a new instant messaging service. Call it Viber,**
11 **V-i-b-e-r. You create a new username. You create**
12 **a new password.**

13 Have you just provisioned your device to
14 use the Viber service?

15 **A. As I said, I don't have specific comments**
16 **on your scenario. All I can say is that if you are**
17 **adding a new service and a new subscription, you**
18 **are -- that is an example of provisioning. Just**
19 **accessing your existing email using an existing**
20 **email ID and a password is not what one of ordinary**
21 **skill in the art or even in the industry would**
22 **consider as provisioning.**

23 **Q. Let's go to paragraph 112 in your**
24 **declaration.**

25 **A. Yes.**

1 Q. In paragraph 112, you discuss terms in the
2 '254 patent such as "access" and "activate."

3 Do you see that?

4 A. Yes.

5 Q. How do you understand the term "activate"
6 as used in the '254 patent?

7 A. So the idea is that in response to a
8 provisioning request, which means that you have
9 created a subscriber -- a new subscription, and you
10 added a new kind of service, set up a billing plan
11 and all that. So activate actually implements it,
12 implements the subscription.

13 So provision is a request that asks for a
14 particular type of service and a particular type of
15 subscription, and activate means you are now
16 implementing it and creating, for example, the new
17 subscription or the account for that particular
18 network service. And it's again different and
19 distinct from logging into an existing account or
20 accessing an already existing service that was
21 previously activated and provisioned.

22 Q. When I tell you that I installed -- to run
23 with your example -- the WhatsApp instant messaging
24 software on my phone, and I access the WhatsApp
25 instant messaging service for the very first time

1 from my brand-new phone, you would not say that my
2 phone has been activated to use that service.
3 Correct?

4 ATTORNEY STEPHENS: Objection. Form.

5 A. Again, it's a very high level description.
6 But the way, as I said, you sign up for the
7 WhatsApp service. You act -- you create an account
8 and all that. And when you download it on a
9 particular phone and install the application, you
10 are just accessing WhatsApp. You are not
11 activating it. The account has already been
12 created elsewhere and provisioned elsewhere.

13 Q. So the fact that I'm accessing the
14 WhatsApp for the very first time on a brand-new
15 device right out of the box does not trigger
16 provisioning or activating in your mind. Correct?

17 ATTORNEY STEPHENS: Objection. Form.

18 A. Again, I mean your question is very high
19 level. But the way I see that is when you sign up
20 for an account, sign up for the WhatsApp service,
21 you are sending a request for the provisioning that
22 WhatsApp service. You create a user ID, you create
23 a password, or you go through other techniques.
24 And then subsequently after that account is created
25 and you've been activated by WhatsApp, the service

1 **provider, which is Meta or Facebook, then you are**
2 **able to access it or log in on various devices.**

3 Q. So, then, in your understanding, the
4 process of provisioning and the process of
5 activating are all process of creating something
6 brand-new or changing something that exists from
7 the server's perspective, from the provider's
8 perspective?

9 A. At a high level, what it means is that you
10 are creating a service, creating an account or
11 something, or changing an existing -- or creating a
12 new subscription or changing a subscription with
13 the service provider. Everything else that you do
14 later is just accessing that service. You buy a
15 new phone; you're still accessing your same
16 WhatsApp.

17 Q. Dr. Madiseti, you use text messaging from
18 your device. Correct?

19 ATTORNEY STEPHENS: Objection. Relevance.

20 A. You mean mobile SMS type of text
21 messaging? Yes.

22 Q. Yes, sir.

23 A. Yes.

24 Q. And, obviously, you would agree with me
25 that SMS messages can be directed to a telephone

1 number?

2 **A. SMS messages can be sent to somebody's --**
3 **can be sent using somebody's SMS number.**

4 Q. In other words, the recipient of an SMS
5 message will be somebody -- the recipient's cell
6 phone number. Correct?

7 **A. It can be, yes.**

8 Q. Okay. Let's take a look at your
9 paragraph 123.

10 **A. 123. Okay.**

11 Q. Before we start talking about 123, I just
12 want to wrap up our conversation of provisioning
13 and activating.

14 Do you think that those two terms are
15 synonymous in the context of the '254 patent?

16 **A. I would say that one is a request. The**
17 **other one is how you implement it, to satisfy --**
18 **responsive to the request.**

19 Q. In other words, in your view, provisioning
20 would be to create a new service while activating
21 would be to implement that new service by creating
22 all the necessary database records and flipping all
23 the right switches on the server side?

24 ATTORNEY STEPHENS: Objection. Form.

25 **A. No. What I would say is that provisioning**

1 means you're requesting a particular type of
2 service, like an email service, where you request a
3 user ID and a password, and then activate -- you
4 are requesting an email service. Then activation
5 means you are creating the user ID and service and
6 allowing this -- allowing the setting up of that
7 new account.

8 Q. Okay. Let's go back to your paragraph
9 123.

10 A. Okay.

11 Q. The last sentence in that paragraph -- and
12 that's the sentence that straddles the page -- "In
13 other words, it is the caller's number that is
14 associated with routing and interworking and not
15 the first telephone number of the virtual
16 assistant."

17 Do you see that?

18 A. I put that in quotes. So it is something
19 that I am saying that the virtual assistant already
20 knows the telephone number. So it's not responsive
21 to anything else.

22 And I'm discussing that in the context of
23 the association -- association limitation that
24 starts in paragraph 121, which says that in
25 response to receiving the provisioning request, you

1 are associating the second service with first
2 telephone number, and wherein the first telephone
3 number is associated with routing and interworking
4 data. So I go through that and describe paragraph
5 123 as a part of that analysis.

6 Q. So in Bodart, you understand its
7 disclosure to connect all the routing tools to the
8 caller's number, not to the recipient's number. Is
9 that correct?

10 A. That's not correct in the manner claimed,
11 because to the extent that the caller number is
12 associated with the routing and networking, it's
13 not done as the claim limitation requires it to be.

14 Q. No, I understand that. My question right
15 now is not about the claims. I'm trying to
16 understand your understanding of Bodart. Okay?

17 So as I understand your declaration, you
18 understand Bodart as disclosing that routing of
19 incoming phone calls are connected to the caller's
20 number, not the recipient's number.

21 Did I understand your opinions correctly,
22 sir?

23 A. My opinion is that the virtual assistant
24 is using user-set rules. So the user is
25 determining what happens with the routing and

1 interworking. So the user and not the service
2 provider, not the telephone provider, not the
3 telephone service provider. It is the user that is
4 doing the routing and interworking, and doing that
5 based on the caller's number, and not in response
6 to any provisioning and not by any of the services
7 themselves. Just the user is getting out the
8 routing and the networking based on the caller's
9 number, using their own rules, which does not meet
10 the claim limitations that are described in this
11 section.

12 Q. Is that because the virtual assistant is
13 not a part of the service provider?

14 A. For the reasons that are described, it's
15 not part of it, for the -- it is in response. The
16 rules were already defined earlier. It is not in
17 response to provisioning. It is not -- so all the
18 reasons that are described in my declaration.

19 Q. Well, if a user goes to Bodart's virtual
20 system and creates for the very first time a new
21 routing rule, saying, you know, if I receive a call
22 from Dr. Madiseti, please make sure to route it to
23 my office -- to my centralized number, according to
24 our previous conversation, that's creating a new
25 service. Why is that not provisioning?

1 ATTORNEY STEPHENS: Objection. Form.

2 A. It's not -- it's not creating a new
3 service. It's not a new subscription plan. It's
4 just a user redirecting a call. It has nothing to
5 do with the service provider.

6 Q. In other words, if -- so then your
7 argument depends upon the -- you know, your
8 understanding of Bodart's virtual assistant is not
9 a part of the service provider. Right?

10 A. No.

11 ATTORNEY STEPHENS: Objection. Form.

12 A. There are many arguments I provide here,
13 first of all, that you are -- it has not been in
14 response to a provision. It is not done -- it is
15 just a telephone call that is an existing service
16 that was rerouted by a user and it is not -- it is
17 based on a user phone number that is unconnected to
18 the user's -- it's based on the caller's telephone
19 number that's unconnected to the user. And these
20 are some of the reasons that are described in this
21 section.

22 Q. Now, if Bodart's virtual assistant was
23 part of a telephone service provider, and the user
24 asked to create a new routing rule, that would
25 certainly be provisioning under your understanding

1 of the term. Right?

2 ATTORNEY STEPHENS: Objection. Form.

3 A. No.

4 Q. Why not?

5 A. As I said, this -- for the reasons that I
6 described here, that it's not done in response to
7 receiving a request for provision. It is not doing
8 the association. It is doing some sort of
9 association with the caller's number. There is no
10 change of service or subscription plan. It is just
11 a user-based redirection of a call.

12 Q. Now, earlier you said that Bodart's
13 virtual assistant knows the user's phone number.

14 Do you remember that?

15 A. It knows caller number.

16 Q. What do you mean by "it knows"? I mean,
17 isn't the number just stored in the virtual
18 assistant?

19 A. The rule is using -- the rule is using the
20 knowledge of the -- of a call from a certain
21 contact --

22 Q. Right. And the rule --

23 A. -- of the user --

24 Q. Sorry. Go ahead.

25 A. -- of the user of that virtual assistant.

1 **It's nothing to do with the provider.**

2 Q. All right. So --

3 A. Or that is not in response to a provision.

4 **The cell phone service has already been -- the**
5 **phone service has already been provisioned.**

6 Q. So the rule that has been created and
7 stored at Bodart's virtual assistant, it already
8 stores the phone number of the caller because
9 that's how it -- a particular rule is triggered.
10 Right?

11 ATTORNEY STEPHENS: Objection. Form.

12 A. Again, I don't know. The details are not
13 there.

14 Q. Well, you said earlier that Bodart's
15 virtual assistant already knows the phone number of
16 the caller. Right?

17 A. It talks about a certain contact or
18 something.

19 Q. Right.

20 A. So, again, I don't know how it does what
21 it does, where it does.

22 Q. Well, we can agree that in Bodart, at
23 least some of the things that the virtual assistant
24 does is it receives a phone call, looks at the
25 number of the caller, and based on that number, it

1 can route the call appropriately. Correct?

2 **A. Under certain conditions that are**
3 **different from the claimed limitations.**

4 Q. All right. We're just talking about
5 Bodart, sir.

6 **A. Yes. But in a manner that differentiates**
7 **it from the claim limitation in many ways.**

8 Q. Okay. So, in other words, Bodart's
9 virtual assistant has to have knowledge of the
10 caller's phone number, because otherwise it
11 wouldn't be able to use the user's rules. Correct?

12 ATTORNEY STEPHENS: Objection. Form.

13 **A. Again, we don't know how it implements it.**
14 **Maybe it just looks at all are new numbers. Who**
15 **knows what it does? It's just a very high level**
16 **description.**

17 **But what is clear from my description and**
18 **my opinions is the basis that it -- these**
19 **disclosures do not meet the claimed --**

20 Q. Bodart's virtual assistant --

21 **A. -- or rendered obvious the claim**
22 **limitation.**

23 Q. Yeah, that wasn't my question. But I
24 appreciate you reciting portions of your
25 declaration.

1 Bodart's virtual assistant also knows the
2 phone number of the user of the virtual assistant.
3 Right?

4 **A. Again, we don't know what the app does and**
5 **what does not know. But it does base its routing**
6 **on user-defined rules.**

7 Q. Well, that's what you said in your
8 paragraph 123. Virtual assistant already knows the
9 telephone number of the virtual assistant user.

10 Are you saying that what you wrote in 123
11 is wrong?

12 **A. No. What I said is the virtual assistant**
13 **knows, yeah. But how it stores it, what it does,**
14 **it just knows. That's all I said.**

15 Q. So it knows. It's omnipotent?

16 **A. It knows, but I don't know how it does it.**

17 ATTORNEY STEPHENS: Objection. Form.

18 Q. So the virtual assistant knows the
19 telephone number of the virtual assistant user. We
20 can agree to that. Right?

21 **A. Yes.**

22 Q. Okay. And the virtual assistant also
23 knows the telephone number of the caller. Right?

24 ATTORNEY STEPHENS: Objection. Form.

25 **A. We don't know specifically how it does**

1 **that. But it says that the contact is recognized**
2 **in that -- in that portion of paragraph 57 of**
3 **Bodart. It says that if the contact 15 is**
4 **recognized, then virtual assistant may forward the**
5 **call appropriately according to the predefined**
6 **rules, based on the caller's phone number, or some**
7 **recognition of it.**

8 Q. I'm just reading your paragraph 123, and
9 I'm looking at the second sentence: "It is the
10 caller's number that is associated with routing and
11 interworking."

12 Do you see that part?

13 A. **As I said, not the manner claimed. It is**
14 **just looking at it in the manner that says that a**
15 **predefined rule routes based on a caller's number.**
16 **That's not responsive any provisioning request.**

17 Q. Do you see the word "associated" in that
18 sentence that we just read?

19 A. **Yes.**

20 Q. Do you understand the word "associated" to
21 be a database concept as you use it in this
22 sentence?

23 A. **I'm not sure what you're asking.**

24 Q. Well, you have the line here that the
25 number that is associated with routing and

1 interworking.

2 What do you mean by associated with
3 routing and interworking?

4 **A. All I'm saying is that there is some sort**
5 **of user-based rule that predefines in a manner that**
6 **is not responsive to the provisioning. It**
7 **recognizes a caller's number in some way. It**
8 **routes it to some location.**

9 Q. Okay. Where would information like this
10 association be stored?

11 **A. It may not be stored. It is just like two**
12 **people riding on a bus. They're just a call that**
13 **comes in. The two people are on a bus, just like a**
14 **call, and they go their separate ways.**

15 Q. Well, if the virtual assistant is being
16 utilized by, let's say, 10 users, each of those 10
17 users has their own routing rules. Where would
18 those routing rules be stored?

19 **A. I don't know. Bodart describes 10 users.**
20 **I'm not sure what your question is.**

21 Q. Which part of my question did you not
22 understand?

23 **A. I didn't understand your question at all.**

24 Q. Okay. So Bodart has a virtual assistant.
25 Right?

1 **A. Yes.**

2 Q. Okay. And that virtual assistant is not
3 being created for one user and one user only?

4 **A. What do you mean?**

5 Q. Bodart contemplates that more than one
6 person would be utilizing its virtual assistant.
7 Correct?

8 ATTORNEY STEPHENS: Objection. Form.

9 **A. What are you referring to?**

10 Q. I'm sorry. What?

11 **A. Which portion of Bodart are you referring**
12 **to?**

13 Q. Have you read Bodart?

14 **A. Yes.**

15 Q. Do you understand Bodart?

16 **A. As I said, I've not memorized it, so I'm**
17 **asking you what portion are you relying upon? I'm**
18 **not --**

19 Q. I'm just asking for your understanding.
20 Can there be multiple users of Bodart's
21 virtual assistant, yes or no?

22 ATTORNEY STEPHENS: Objection. Form.

23 **A. I mean, I would have to refer to Bodart.**

24 **I don't recall Dr. Houh --**

25 Q. Well, take a look. I'll make Bodart

1 available to you right now.

2 **A. Okay.**

3 Q. Here is what has been previously marked as
4 Exhibit 1005, which is Bodart.

5 Now, please take a look, and I would like
6 for you to answer the following question: Can
7 multiple users use Bodart's virtual assistant?

8 ATTORNEY STEPHENS: Objection. Form.

9 **A. I mean, Bodart seems to be referring to a**
10 **user and improving the productivity of the user.**

11 Q. Well, I guess my question is the entirety
12 of Bodart, is it dedicated to a single user, or
13 would it potentially improve the productivity of,
14 let's say, two users?

15 **A. I just see a reference to a user.**

16 Q. So the entirety of Bodart's system and all
17 of its complexities is designed for one user and
18 one user only?

19 ATTORNEY STEPHENS: Objection. Form.

20 **A. I'm not sure. That's why I asked you what**
21 **are you pointing to? I can only see examples of**
22 **how a user may track with a virtual assistant.**

23 Q. So can there be multiple users of Bodart's
24 virtual assistant?

25 ATTORNEY STEPHENS: Objection. Form.

1 **A. I don't see such specific disclosure**
2 **that -- I mean, there could be -- if a user is**
3 **using the virtual assistant and the virtual**
4 **assistant is using the user-defined rules, those**
5 **user-defined rules would be configured and used by**
6 **that user. So I don't see --**

7 **Q. I agree with you wholeheartedly. My**
8 **question is different.**

9 Let me simplify further.

10 Let's say you and I are both users. If
11 you and I both use Bodart's virtual assistant, you
12 would have your own rules; I would have my own
13 rules. My rules don't depend on your rules; your
14 rules don't depend on mine.

15 Is that a plausible scenario in Bodart?

16 ATTORNEY STEPHENS: Objection. Form.

17 **A. Again, I cannot say that there is that**
18 **particular disclosure of anything other than a user**
19 **and using it -- using their own user-set rules.**

20 **Q. Okay. Does Bodart prohibit multiple users**
21 **from using its virtual assistant?**

22 ATTORNEY STEPHENS: Objection. Form.

23 **A. Again, I don't have -- and as I said, I**
24 **don't see a specific disclosure of anything other**
25 **than a user using the virtual assistant.**

1 Q. Okay. So as a person of skill in the
2 art -- I would assume you would consider yourself
3 one -- would you understand Bodart to anticipate a
4 situation where multiple users could use its
5 virtual assistant?

6 ATTORNEY STEPHENS: Objection. Form.

7 A. I don't see that. I see the disclosures
8 of how a single user is using and customizing the
9 virtual assistant with their own rules. I don't
10 see anything else.

11 Q. Okay. Would a PHOSITA be able to
12 implement Bodart's system in a way that would allow
13 multiple users to use its virtual assistant?

14 ATTORNEY STEPHENS: Objection. Form.

15 A. I'm not seeing Dr. Houh for the petitioner
16 make that argument.

17 Q. It's my question for you, sir.

18 A. As I said, I don't have an opinion on that
19 issue. I don't see that.

20 Q. So you don't know?

21 A. I said I don't see that. I don't see -- I
22 see that as a new argument made by the petitioner.
23 I don't see that.

24 Q. I'm not arguing, sir. I'm asking a
25 question.

1 **A. I said I can't say -- I can't answer that.**

2 **I don't believe it does.**

3 Q. Okay. So it is your opinion that Bodart
4 is limited to one user and one user only? I just
5 want to make sure I'm clear on this.

6 **A. All I'm saying is that --**

7 ATTORNEY STEPHENS: Objection. Form.

8 **A. All I'm saying is is the disclosure of**
9 **Bodart describes productivity enhancement for a**
10 **user on their devices.**

11 Q. Okay. All right. Let's go to Bodart, and
12 let's look at paragraph 44.

13 **A. Of who?**

14 Q. Bodart.

15 **A. Okay.**

16 Q. All right. Let's take a look at 44. You
17 see it begins with a discussion of virtual
18 assistant 101.

19 Do you see that?

20 **A. Counsel, what do you want me to look at?**

21 Q. Dr. Madiseti, I just asked you to look at
22 paragraph 44 of Bodart. Did you not understand
23 that?

24 ATTORNEY STEPHENS: Objection. Form.

25 **A. Oh, I thought you said 4. I thought you**

1 **said 4.**

2 Q. 44.

3 A. **I heard it as paragraph 4.**

4 Q. Thank you for the clarification. I
5 appreciate that.

6 A. **I mean, was it really 44 you said? It**
7 **sounds pretty clear it was 4.**

8 Q. Well, I'm looking at the live transcript
9 and it does say 44. But since you understand me
10 now, let's go to 44.

11 A. **Okay.**

12 Q. Are you on 44 or are you looking at 4?

13 A. **No, I'm looking at 44.**

14 Q. Good.

15 Virtual assistant 101, do you see that?
16 It begins with that discussion.

17 A. **Yes.**

18 Q. Okay. Can you read that paragraph to
19 yourself and let me know when you're ready.

20 A. **Yes.**

21 Q. You read much faster than I do, sir.

22 Do you see the very first sentence says
23 that the virtual assistant 101 may include the
24 ability to receive and direct calls and messages
25 directed to user 201?

1 Do you see that?

2 **A. Yes.**

3 Q. Okay. And then the next sentence talks
4 about incoming telephone calls from contact 215 is
5 routed based on the user's current status as well
6 as whether or not the person making the call is
7 recognized.

8 That recognition, that's what you and I
9 have been talking about as the rules that have been
10 created by the user. Right?

11 **A. Yes. Example of the rules, yes, created**
12 **by the user.**

13 Q. Okay. And the incoming messages that can
14 be routed in Bodart include instant messaging and
15 SMS and even email messages. Right?

16 **A. Using the message routing rules. Using**
17 **the message routing rules, yes. It's not, again,**
18 **responsive to a provisioning message or anything**
19 **else. It's just --**

20 Q. That's not my question, sir.
21 Let's keep look at paragraph 44.

22 **A. Okay.**

23 Q. Virtual assistant 101 is able to recognize
24 the identity of the sender.

25 Do you see that? It's roughly two-thirds

1 down.

2 **A. Yes. Rather, yeah.**

3 Q. And decide whether or not to route the
4 call to voice mail or some other system.

5 Do you see that as well?

6 **A. Yes.**

7 Q. And all of this routing again is based on
8 the rules that a user creates. Correct?

9 **A. Yes. And independent of any response to**
10 **provision.**

11 Q. All right. Let's take a look at your
12 paragraph 131 in your declaration.

13 **A. Okay.**

14 Q. In 131, you say in the very first sentence
15 that a PHOSITA would further understand that
16 Customer 1 is not a provider.

17 Do you see that?

18 **A. Yes. Paragraph 131 is a portion of my**
19 **declaration that deals with the second ground,**
20 **which is the DeCastro ground. And I'm specifically**
21 **talking --**

22 Q. I'm just asking if you see the first
23 portion of your sentence that says that customer 1
24 is not a provider.

25 Do you see that?

1 **A. I see that. That's part of my analysis of**
2 **claim element 1.3, the DeCastro ground.**

3 **Q. Awesome.**

4 Why is customer 1 not a provider, in your
5 opinion?

6 **A. The customer 1 is just an application**
7 **developer. They don't provide any service. They**
8 **don't provide a phone service. They don't provide**
9 **any other service for the reasons that are**
10 **described in my declaration.**

11 **Q. Is it your opinion that an application**
12 **developer who codes application scripts cannot also**
13 **be a provider?**

14 **A. As required in the claim, you are required**
15 **a telephony service provider. The customer 1 is**
16 **just an application developer. They are not AT&T**
17 **or Sprint or BellSouth or any of these service --**
18 **telephony service providers. So --**

19 **Q. Well, you would agree with me that**
20 **T-Mobile, or developers that T-Mobile hires, do**
21 **design apps for T-Mobile users. Right?**

22 **A. Disagree. There is no such disclosure.**
23 **This clearly talks about --**

24 **Q. No, we're talking about T-Mobile right**
25 **now. T-Mobile.**

1 **A. Again, I have no comments on that. You**
2 **are just guessing.**

3 Q. What part am I guessing about, sir?

4 **A. You are just making assumptions that are**
5 **not in the record nor were put in the petition.**

6 Q. Well, I'm asking what your understanding
7 is of T-Mobile.

8 **A. As I said, I don't have --**

9 Q. You have T-Mobile.

10 **A. I don't have understanding of how T-Mobile**
11 **works, and I don't believe that a PHOSITA would.**

12 Q. You don't think a PHOSITA would understand
13 how T-Mobile works.

14 Which specific portion would a PHOSITA not
15 understand of how T-Mobile works?

16 ATTORNEY STEPHENS: Objection. Form.

17 **A. As I said, to say that there would be a**
18 **specific description of DeCastro that T-Mobile**
19 **would actually implement. I don't see such a**
20 **disclosure.**

21 Q. We're focused on T-Mobile, sir. Just
22 T-Mobile.

23 Let me ask you this: You're aware that
24 T-Mobile has a website. Right?

25 **A. Yes.**

1 Q. And have you ever used that website to log
2 in and make changes to your service?

3 ATTORNEY STEPHENS: Objection. Scope.
4 Relevance.

5 A. I've logged in but I've not made changes.

6 Q. Okay. You've logged in?

7 A. Yes.

8 Q. Did somebody design that website, or did
9 it magically appear one day?

10 ATTORNEY STEPHENS: Objection. Form.

11 A. I don't know.

12 Q. You don't know if it was created by
13 somebody?

14 A. As I said, counsel, I don't want to
15 speculate.

16 Q. So T-Mobile's website could potentially
17 just appear out of thin air?

18 ATTORNEY STEPHENS: Objection. Form.

19 A. Again, I mean, as I've said, counsel, your
20 guess is as good as mine. It could have been
21 developed. I really -- I don't have an opinion. I
22 don't understand T-Mobile's business practices.

23 Q. Okay.

24 A. And I'm the one in the role, so I don't
25 need to speculate.

1 Q. So where could T-Mobile's website have
2 come from?

3 A. I don't know.

4 Q. Okay. Could it have been developed by an
5 application developer? Could it have been
6 developed?

7 A. Not in the context of DeCastro.

8 Q. That's not my question. Please listen.
9 Could T-Mobile's website have been
10 developed by an application developer?

11 A. I don't know.

12 Q. Could it have been?

13 A. As I said, I don't have an opinion on that
14 issue.

15 Q. Well, I'm asking you to answer my
16 question. Are you refusing to answer?

17 A. As I said, I don't have a opinion in my
18 declaration on that issue. I don't wish to
19 speculate.

20 Q. So you can't answer my question. Is that
21 correct?

22 A. Yes, I don't want to --

23 ATTORNEY STEPHENS: Objection. Form.

24 A. I cannot speculate.

25 Q. When we talk about providers, in the

1 context of the '254 patent, what are the
2 characteristics that you would say are required for
3 something to be a provider?

4 **A. The claim speaks for itself. As an**
5 **example, the provider should provide a service, and**
6 **they should be able to receive a request to**
7 **provision a service. Then in response to that,**
8 **they should be able to do all the remaining steps,**
9 **like activation, mapping, association.**

10 **So the claim describes the specific**
11 **requirements of a service provider.**

12 **Q. To be a telephone service provider,**
13 **presumably a telephone service provider would have**
14 **to utilize, or use, telephony equipment. Correct?**

15 **A. No. They have to -- that's not how I**
16 **define it.**

17 **Q. That's my question.**

18 **A. No, I would not agree with that. Just**
19 **using? Using means -- does not satisfy the**
20 **requirements of the claim. You have to --**

21 **Q. I'm just asking you about a service**
22 **provider, sir, not about the claim right now,**
23 **please. This will go a lot faster if you listen.**

24 **ATTORNEY STEPHENS: If we could let the**
25 **record reflect that counsel is interrupting the**

1 witness.

2 THE WITNESS: And it's not the first time.

3 Q. You're not answering my question, sir. It
4 would help if you listen to my question.

5 A telephone service provider -- okay? --
6 it needs to provide telephony service. Otherwise,
7 it's not a telephone provider. Right?

8 **A. I cannot talk about a generic telephone**
9 **service provider untethered to the claims of the**
10 **'254. I am talking specifically about the '254**
11 **claims.**

12 Q. Okay. To be a provider within the context
13 of the '254 patent, must the provider own all of
14 the infrastructure that it utilizes to provide
15 telephone service?

16 **A. Again, counsel, you are making arguments**
17 **that are not in the petition or in Dr. Houh's**
18 **declaration. I do not know what your question is**
19 **asking, but the claims have a specific meaning and**
20 **the claims have to be satisfied by the asserted**
21 **grounds. I don't wish to change the language of**
22 **the claims.**

23 Q. I'm not changing the language. I'm asking
24 you a question about your understanding of a
25 telephone service provider in the context of the

1 '254 patent, which you claim to have read many
2 times.

3 So let me ask again: What is your
4 understanding of a telephone service provider?

5 **A. As I said, a telephone service provider as**
6 **used in the claim should be able to satisfy or**
7 **practice the claim limitations. They have to be**
8 **able to provide a first service. They should be**
9 **able to receive a request for provisioning. They**
10 **should be able to provide a certain -- do a certain**
11 **number of steps, like create, activate, and**
12 **associate in response to receiving that**
13 **provisioning request.**

14 ATTORNEY GORYUNOV: Okay. We've been
15 going for quite a bit here. Let's take a break.

16 Counsel, any objection to 20 minutes?

17 ATTORNEY STEPHENS: Well, I guess it
18 depends on what the -- let's -- let's take a
19 break off the record and we can discuss the
20 length of it.

21 ATTORNEY GORYUNOV: Sure. Off the record.

22 THE REPORTER: Off the record at 12:30
23 p.m.

24 (Recess taken from 12:30 p.m.
25 to 1:01 p.m.)

1 THE REPORTER: Back on the record at

2 1:05 p.m.

3 BY ATTORNEY GORYUNOV:

4 Q. Welcome back, Dr. Madisetti.

5 A. Thank you.

6 Q. During break, did you speak to counsel
7 about the subject matter of your testimony?

8 A. No. I didn't speak to him at all, all
9 day.

10 Q. All right. Let's look at Claim 1 of the
11 '254 patent, and that's in Exhibit 1001.

12 Let me know when you're there.

13 A. Okay.

14 Q. I am looking at the limitation, the first
15 big limitation, the one that starts with "A server
16 coupled to a database" -- "the database."

17 Do you see that?

18 A. Yes.

19 Q. Okay. The limitation in full -- let me
20 just read the portion I want to talk to you about:
21 "A server coupled to the database wherein the
22 server is utilized by a first provider to provide a
23 first service to a service user."

24 Do you see that?

25 A. Yes.

1 Q. Okay. Who does -- sorry.

2 What entity provides the service to the
3 user? Is it the server or is it the first
4 provider?

5 A. The first provider.

6 Q. So let's go back to your declaration,
7 Exhibit 2006, and let's go to your paragraph 70.

8 Let me know when you're there.

9 A. Okay.

10 Q. Okay. The last sentence is what I'd like
11 to talk to you about. It goes: "In other words,
12 intercepting and forwarding calls for an individual
13 is not providing a telephone service to a first
14 user by a telephone service provider."

15 Do you see that?

16 A. Yes.

17 Q. Okay. Why is intercepting and forwarding
18 calls not providing a telephone service?

19 A. Because it is -- the phone company is not
20 even sure, not even -- doesn't even know that the
21 calls are intercepted and forward. The phone
22 service is not providing the service at all.

23 Bodart itself has a customized virtual
24 assistant that has nothing to do with first
25 provider. The first provider is unaware of any of

1 **this forwarding, and it is just -- neither Verizon**
2 **nor AT&T nor Sprint is even aware that any of the**
3 **calls are forward.**

4 Q. All right.

5 A. **In addition to the other reasons. In**
6 **addition to the other reasons that I described.**

7 Q. So one of the reasons you believe that
8 Bodart's virtual assistant doesn't satisfy the
9 claim is because it acts, in your understanding,
10 independent of Verizon, AT&T, or Sprint. Is that
11 correct? That's one of the reasons?

12 A. **The way I would say that is that the**
13 **service provider has no idea what's being done. It**
14 **is -- it is just providing a phone service. It**
15 **doesn't know anything about the virtual assistant**
16 **doing anything else. It's not a service -- it's**
17 **not a telephone service.**

18 And intercepting and forwarding is not a
19 telephony service either. It is -- telephone
20 service means you understand someone like AT&T or
21 Verizon who take requests for provisioning and who
22 activate subscriptions and so on as in the manner
23 **claimed.**

24 Q. Now, if AT&T, Verizon, or Sprint were to
25 be aware of the intercepting and forwarding of

1 calls by the virtual assistant, would that reduce
2 your concern about this specific reason?

3 **A. No, for many other --**

4 ATTORNEY STEPHENS: Objection. Form.

5 **A. It would not reduce for many other**
6 **reasons. It does not satisfy the claim limitation**
7 **for the reasons that I described in my declaration.**

8 Q. So knowledge by Verizon, AT&T, and Sprint
9 of the intercepting and forwarding would still not,
10 in your view, help the virtual assistant provide
11 service to the user. Correct?

12 ATTORNEY STEPHENS: Objection. Form.

13 **A. The provider is not using these virtual**
14 **assistants to provide a service. They are not even**
15 **aware of them.**

16 **Further, there is no provisioning or**
17 **activation as the claim requires as we discussed in**
18 **my declaration. There is no in response to a**
19 **provision request. All these different reasons**
20 **that are described in my declaration.**

21 Q. Okay. In Bodart, we can agree that the
22 virtual assistant intercepts and forwards calls
23 based on the user's rules. Correct?

24 **A. In a very restrictive manner, and not in**
25 **the manner claimed.**

1 Q. Okay.

2 A. For several reasons that are discussed in
3 my declaration. It is not responsive to the
4 provisioning. It is not doing it as a part of a
5 new service or a subscription change, it is not
6 doing it in response, and all these other reasons.
7 And there are several fatal flaws in that
8 combination.

9 Q. All right. Well, right now we're just
10 talking about Bodart, not in connection with the
11 claims. I just want to make sure that you and I
12 agree that Bodart's virtual assistant intercepts
13 and forwards calls based on rules created by the
14 user.

15 Do you agree with that?

16 A. Again, to the extent it does, it's not in
17 the manner claimed for a variety of reasons. It's
18 not done in response to provisioning or anything
19 else.

20 Q. Okay. So let's say in Bodart, a user
21 creates a rule saying allow only calls from
22 Dr. Madiseti.

23 Do you envision that situation?

24 ATTORNEY STEPHENS: Objection. Form.

25 A. Yes.

1 Q. Okay. So then the user creates a rule
2 saying, "Virtual Assistant, only allow calls to me
3 from Dr. Madiseti." Okay?

4 Dr. Madiseti, you call this user and the
5 virtual assistant would allow that call to go to
6 the user. Is that correct?

7 A. Okay. That's what you're asking me to
8 assume.

9 Q. Okay. Now, let's say I call that user and
10 the user has no rule about how to handle calls from
11 me, so the virtual assistant would therefore not
12 forward the call to the user.

13 ATTORNEY STEPHENS: Objection. Form.

14 Q. Would you agree?

15 A. I don't know. I don't know if Bodart goes
16 into that detail and explain what it does.

17 Q. Okay. But we at least can agree that if a
18 user creates a rule saying "Please allow all calls
19 from Dr. Madiseti," then your calls would be
20 allowed to go through the virtual assistant to the
21 user. Right?

22 A. Based on what you're assuming, I think --
23 again, it's your assumption, your hypothetical.

24 Q. Okay. Now, let's say that the user
25 removes the rule that says Dr. Madiseti's phone

1 calls are allowed to be routed to the user. So, in
2 other words, your calls are no longer being
3 forwarded to the user.

4 Why is the virtual assistant not providing
5 telephone service to that user? I mean, with the
6 rule, it allowed your calls to go through. Without
7 the rule, it's not allowing your calls to go
8 through.

9 **A. Again, you are conflating the words --**

10 ATTORNEY STEPHENS: Objection. Form.

11 **A. You are conflating the words "providing"**
12 **with "provisioning."**

13 Q. No, I'm literally talking about providing.
14 I have not said the word "provisioning," sir.

15 **A. No, you are trying to conflate providing**
16 **with provisioning.**

17 "Provisioning" is a specific term of art
18 and it requires you to establish a new account or a
19 new service or a new subscription. The claim
20 requires that this be done in response to a
21 provisioning request. So that's not done in
22 **Bodart.**

23 Q. That's not my question.

24 My question is, if the user creates a
25 rule -- okay? This is why I've clarified. We're

1 talking about Bodart right now. Okay?

2 The user creates a rule allowing the
3 interception and forwarding of phone calls from a
4 particular user. Then the user removes that rule,
5 therefore no longer allowing the interception and
6 forwarding of phone calls from that particular
7 user.

8 Why does the virtual assistant, in your
9 view of Bodart, and Bodart only, not provide a
10 telephone service to that user?

11 **A. That's not how we understand providing a**
12 **telephone service would be. I understand providing**
13 **a telephone service to be the ability to offer a**
14 **service to a customer through a subscription plan,**
15 **to activation of the service, and then having them**
16 **use the service.**

17 So all the virtual assistant is doing is
18 ability to access the phone line or the phone call
19 or not. It is not in any sense providing a phone
20 service. It is just restricting the ability to
21 access a call. That's it. It's not restricting a
22 phone service. The customer or the user still has
23 the phone service with the same subscription.

24 Q. All right. Let's look at your paragraph
25 71 in your declaration.

1 **A. Okay.**

2 Q. All right. The last sentence, the one
3 that straddles the page: "Indeed, it would be
4 impractical, in my opinion, for a telephone service
5 provider such as AT&T to utilize Bodart's personal
6 virtual assistant, especially when there's no
7 reason to do so to intercept phone calls and
8 instant messages on behalf of an individual user."

9 Okay? Do you see that?

10 **A. Yes.**

11 Q. How do you understand the word "utilize"
12 in this context?

13 **A. What is the question?**

14 Q. Again, looking at the last sentence of
15 your paragraph 71, you have the word "utilize" in
16 quotes in the second line of the sentence.

17 Do you see that?

18 **A. Mm-hmm. Yeah.**

19 Q. How do you understand the word "utilize"?

20 **A. An example of utilize would be to use.**

21 Q. Okay. What's another example of utilize?

22 **A. That's all I have.**

23 Q. This definition is based on your
24 understanding of the '254 patent. Right?

25 **A. I'm not sure what you're asking. You just**

1 **said in this question let's just talk in Bodart,**
2 **and now you are bringing back the '254 when**
3 **convenient to you.**

4 Q. That's right.

5 A. **I believe it's consistent with the '254**
6 **patent's examples.**

7 Q. Okay.

8 A. **Which means access and use.**

9 Q. Does the '254 patent provide an express
10 definition for the phrase "utilized by"?

11 A. **I believe it provides several examples**
12 **that would inform a POSITA that utilize means**
13 **access and use.**

14 Q. It provides examples, yes. But does it
15 expressly state, a PHOSITA would have understood,
16 in quotes, "utilized by" to mean, something?

17 A. **As I said, my answer, previous answer**
18 **describes my opinions that -- that as used in the**
19 **'254, utilize -- and I provide examples for that --**
20 **means use or access.**

21 Q. Okay. Telephone companies like AT&T and
22 Verizon and Sprint, T-Mobile, I mean, they all
23 provide telephone service. Right? We can agree on
24 that?

25 A. **They provision and activate telephone**

1 **service, in addition to allowing the users to**
2 **access them.**

3 Q. And these telephone companies utilize
4 things in the network like nodes, terminals, and
5 other equipment such as antennas, towers, wires, to
6 provide this telephone service and allow users to
7 access this telephone service. Right?

8 A. **I'm not sure what you're asking, counsel.**

9 Q. Well, which part of my question did you
10 not understand?

11 A. **I mean, you're reading from something that**
12 **was very detailed, so I'm not sure what you're**
13 **asking.**

14 Q. Actually, I'm not reading. That was
15 actually from my mind. But I'm happy to restate
16 the question for you.

17 A. **Okay.**

18 Q. You just testified that AT&T, Verizon,
19 Sprint, T-Mobile, they allow users to access their
20 telephone services. Correct?

21 A. **I said they provide. They provision -- in**
22 **addition to allowing users to access, they also**
23 **provision and activate services, following which**
24 **they allow users to access the service --**

25 Q. Okay.

1 **A. -- for use.**

2 Q. Telephone companies such as AT&T, Verizon,
3 Sprint, T-Mobile, they allow users to access the
4 service that they provide, and they utilize things
5 like nodes, terminals, and other telephony
6 equipment like towers, wires, antennas, cables, to
7 provide access for users. Right?

8 **A. Again, as I said, in my opinion, I**
9 **wouldn't agree with that. I'm saying that**
10 **telephone providers provision and activate**
11 **services, and then allow users to access the**
12 **provisioned and activated services. That's how I**
13 **would describe it.**

14 Q. Have you ever seen a cellular phone
15 antenna that would be owned by a telephone service
16 provider?

17 **A. I haven't seen it, no.**

18 Q. You haven't seen the big antennas?
19 They're really tall. They have a bunch of
20 receivers on the top. They're the ones that
21 broadcast the signals to users.

22 **A. I mean, they are not cellular phone**
23 **antennas.**

24 Q. What are they?

25 **A. They are base station antennas.**

1 Q. Base stations. Okay.

2 Are base stations used to allow users to
3 access telephone service?

4 A. After -- once the telephone service
5 providers have provisioned and activated the
6 service, then the telephone service providers allow
7 access to the provisioned and activated services by
8 the users using their infrastructure.

9 Q. Okay. Now, let's talk about again the
10 landline telephone that you had at your house many
11 years ago. All right? Again, I think it was
12 Southwest Bell.

13 ATTORNEY STEPHENS: Objection. Relevance.

14 A. Again, I think I answered the question
15 about BellSouth.

16 Q. We're going to talk about it again.
17 All right. BellSouth.

18 A. Yeah.

19 Q. So you had a telephone line coming into
20 your house. Right?

21 ATTORNEY STEPHENS: Objection. Form.

22 A. Yes.

23 Q. Okay.

24 A. It had nothing to do with BellSouth. The
25 telephone line was already in place.

1 Q. Your BellSouth telephone service, however,
2 was using that telephone line. Correct?

3 A. As I said, BellSouth provisioned and
4 activated my service, and then provided the service
5 to me so that I could access it through the
6 telephone line.

7 Q. Okay. And landline telephone services
8 have been provided to users such as yourself using
9 landline telephones for many years. Right?

10 A. Again, I don't agree with that sentence.
11 It's been carefully crafted to include things like
12 services and landlines. I understand fully the
13 motivation.

14 But in my opinion, after provisioning and
15 activation of the service, the user can access the
16 service through a landline.

17 Q. Well, let's talk about Alexander Graham
18 Bell. Okay? He's a guy we all know; right?

19 A. I don't know him.

20 Q. Have you ever heard of Alexander Graham
21 Bell, sir?

22 A. Yes, that's a different question. I did.

23 Q. Okay. You've heard of him; yes?

24 A. Yes.

25 Q. You're aware that he is one of the people

1 attributed with the invention of the telephone.

2 Right?

3 **A. At a high level, yes. I don't know the**
4 **details.**

5 Q. You are aware that he was able to make
6 telephone calls using his telephone invention; yes?

7 **A. Again, I don't know the details, counsel.**

8 Q. I'm asking for your knowledge about
9 something that happened almost 200 years ago.
10 What did you know? That's all I'm asking
11 for.

12 **A. I don't know much.**

13 Q. Did the telephone that Alexander Graham
14 Bell invented use cellular telephony or a telephone
15 line, physical wire?

16 ATTORNEY STEPHENS: Objection. Scope.

17 **A. I don't know the specifics, counsel.**

18 Q. Well, can we at least agree, sir, that
19 cellular telephony was not invented in the late
20 1800s?

21 **A. Again, I cannot say that.**

22 Q. So there's been cell phones since the late
23 1800s?

24 **A. Again, I don't know --**

25 ATTORNEY STEPHENS: Objection. Form.

1 **A. There may be inventions. There may be**
2 **prototypes. We don't really know. I cannot offer**
3 **any opinions that are not in my declaration that**
4 **are not --**

5 Q. I'm just asking you for your personal
6 knowledge.

7 **A. I don't have --**

8 Q. Do you personally know of any cellular
9 phones that existed in the late 1800s?

10 **A. Again, I don't have an opinion.**

11 ATTORNEY STEPHENS: Objection. Scope.

12 Q. Okay. So you can't answer my question
13 about whether cellular phones existed in the late
14 1800s?

15 **A. As I said, I really don't know what the**
16 **technology status was at the time. There could**
17 **have been prototypes and other things. So we don't**
18 **know.**

19 Q. All right. So, so far, we've been able to
20 establish one thing: that when you had telephone
21 service at your house, you had a phone line going
22 into your house. Right?

23 **A. The way I would say that is after my**
24 **service was provisioned and activated by BellSouth,**
25 **I could access that service through my landline.**

1 Q. Okay. Did you own that landline or did
2 BellSouth own that landline?

3 A. I believe I owned it.

4 Q. Did you own that landline all the way from
5 your house to the telephone pole or just the
6 portion of it that was inside your house?

7 ATTORNEY STEPHENS: Objection. Form.

8 A. I don't know. I believe it was --
9 whatever was on my property was owned by me. I
10 just don't know.

11 Q. Understood.

12 Is ownership of telephony equipment
13 required to utilize telephone equipment?

14 A. As I said, counsel, the claims have to be
15 satisfied. You can't change the language of the
16 claims. There has to be a provider of service.
17 The service should be able to be provisioned,
18 activated, and then in a particular way.

19 So all I can say is that you can provide
20 access to that service after it is provisioned and
21 activated. But access itself is not provisioning
22 or activation.

23 Q. Do you have knowledge of telephone
24 services that is independent of the '254 patent?

25 A. I don't understand your question, counsel.

1 Q. What part of it don't you understand?

2 A. I mean, I don't know what you're asking.

3 Q. I can read the question to you again if
4 that would help.

5 Would that help, sir?

6 A. I am not sure what you are asking.

7 Q. Well, let me read the question again, and
8 you tell me what you don't understand.

9 Do you have knowledge of telephone
10 services that is independent of the '254 patent?

11 ATTORNEY STEPHENS: Objection. Form.

12 A. It's a very vague question. I mean, it's
13 like --

14 Q. What's so vague about it?

15 A. I don't understand. I mean, you asked me
16 to tell you if I understand it. I told you I don't
17 understand.

18 Q. Okay. So what do you not understand about
19 that question?

20 A. Again --

21 Q. I'll clarify. If you tell me what you
22 don't understand, I'm happy to clarify. I just
23 don't know what you don't understand.

24 A. Yeah, I don't -- I don't really understand
25 the question.

1 Q. Well, tell me what you don't understand
2 and I'm happy to help you.

3 A. I mean, you're asking, for example, what
4 is a telephony service. I'm not sure what you mean
5 by a telephony service. Now, I've told you that
6 the telephony service is something that must be
7 provisioned and activated by a phone service
8 company like BellSouth.

9 Q. Okay.

10 A. And then subsequently there has to be
11 access to that through a phone line by a user. And
12 that's all. But accessing a phone service is not
13 provisioning or activating.

14 Q. That's not my question. Sir, that is
15 absolutely not my question. I know that you have a
16 sheet of things that you need to say, and I
17 appreciate that, but that's not my question.

18 ATTORNEY STEPHENS: Objection. Form.

19 Q. My question is very simple.

20 ATTORNEY GORYUNOV: Sorry, counsel. Go
21 ahead with your objection.

22 ATTORNEY STEPHENS: I did.

23 Q. My question is very simple. It has
24 nothing to do with the '254 patent. I don't -- at
25 the moment, I'm not interested in what the '254

1 patent says in this one question. Okay?

2 Do you have knowledge of telephone
3 services that is independent of the '254 patent?
4 In other words, aside from the '254 patent and all
5 of the provisioning and all the other things that
6 you keep saying, do you understand what a telephone
7 service is independent of the '254 patent?

8 A. Yes.

9 Q. Okay.

10 A. A telephone service --

11 Q. How do you understand it?

12 A. Yeah. A telephone service is one where a
13 telephone service provider, such as BellSouth, for
14 example, provisions a service where a customer
15 requests a subscription, and then subsequently
16 activates that service and -- on behalf of the
17 customer, and the customer can then access the
18 service through a landline, for example.

19 Q. So your understanding of a telephone
20 service is entirely consistent with the '254
21 patent. Is that fair?

22 A. As I said, counsel, you asked me what it
23 was I said. Now you asked me a new question, and I
24 said --

25 Q. Yes, I am.

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1 A. Yeah. The '254 describes services in the
2 manner claimed, the claimed defined invention, and
3 the invention is consistent with my understanding
4 and the understanding of a person of ordinary skill
5 in the art.

6 Q. Okay. Your understanding of telephone
7 services as you've just described, is that how
8 telephone services operated 10 years ago?

9 A. They always have operated that way. They
10 always included a request for provisioning,
11 subscription, activation of the subscription, and
12 access and use, and utilization of the service by
13 the customers.

14 ATTORNEY GORYUNOV: All right. Let's take
15 a 5-minute break.

16 THE REPORTER: Off the record at 1:35.

17 (Recess taken from 1:35 p.m.
18 to 1:42 p.m.)

19 THE REPORTER: Back on the record at
20 1:42 p.m.

21 BY ATTORNEY GORYUNOV:

22 Q. Dr. Madiseti, let's go back to your
23 Exhibit 101.

24 A. Okay.

25 Q. This is the '254 patent. Let's go to

1 Claim 1.

2 Let me know when you're there.

3 A. Okay.

4 Q. Okay. I'm looking at the big limitation
5 we were just speaking about, and I'll read that
6 again: "A server coupled to the database, wherein
7 the server is utilized by a first provider to
8 provide a first service to a first user."

9 Do you see that?

10 A. Yes.

11 Q. How do you understand the term "utilized
12 by"?

13 A. An example would be that the first
14 provider is using that server to provide the
15 telephony service to the first user.

16 Q. Any other examples?

17 A. No.

18 Q. So "utilized by," in your mind, is using?

19 A. That the first provider, telephony service
20 provider who is like BellSouth, is using the server
21 to provide in this case through provisioning as
22 well as through activation as well as allowing
23 access after provisioning and activation to users
24 through utilization of the server, which is using
25 the server.

1 Q. Does the first provider need to be aware
2 that it is using the server?

3 ATTORNEY STEPHENS: Objection. Form.

4 A. The first provider has to provide a
5 service using it. So that's all I can say.

6 Q. Well, is it possible for the first
7 provider to provide a service using the server
8 without actual knowledge that it is using the
9 server?

10 A. Again, I don't wish to speculate. All the
11 claim limitations have to be met. As I said,
12 Bodart does not meet it for several reasons. I
13 described all these in my declaration.

14 ATTORNEY GORYUNOV: All right. Nothing
15 further.

16 ATTORNEY STEPHENS: All right. If we
17 could take maybe five minutes, we'll --

18 ATTORNEY GORYUNOV: That's good.

19 ATTORNEY STEPHENS: Thank you.

20 THE REPORTER: Off the record at 1:46.

21 (Recess taken from 1:46 p.m.
22 to 1:51 p.m.)

23 THE REPORTER: On the record at 1:51.

24 ATTORNEY STEPHENS: We have nothing
25 further from counsel for Zilkr.

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1 THE WITNESS: I would like to review the
2 transcript and sign.

3 Thank you all. Have a great day.

4 ATTORNEY GORYUNOV: Thank you,
5 Dr. Madisetti.

6 THE REPORTER: I have a standing order for
7 petitioner's counsel. Attorney Stephens, do you
8 need a rough draft, regular turnaround or
9 something faster?

10 ATTORNEY STEPHENS: We don't need any
11 special timing or rush or anything.

12 THE REPORTER: Okay. Thanks.

13 ATTORNEY GORYUNOV: Thank you very much.
14 Pleasure to see everyone.

15 (Witness excused and deposition concluded
16 at 1:52 p.m. EST.)
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1 WITNESS CERTIFICATION and ERRATA SHEET

2 In accordance with the rules of procedure
 3 governing depositions, you are entitled to read and
 4 correct your deposition transcript. Please read
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19 Date: _____

20 VIJAY K. MADISETTI, PhD

21 Subscribed and sworn to before me this _____
 22 day of _____, 20____.

24 _____
 25 Notary Public/Justice of the Peace

1 CERTIFICATE OF REPORTER

2
3 I, Deanna J. Dean, Registered Diplomate
4 Reporter, Certified Realtime Reporter, and New
5 Hampshire licensed court reporter, the officer
6 before whom the proceedings were taken, do hereby
7 certify that the foregoing transcript is a true and
8 accurate record of these proceedings; that said
9 proceedings were taken in Stenotype note by me on
10 the 5th day of March, 2024, commencing at 10:03
11 a.m. and ending at 1:52 p.m.

12 I further certify that present on behalf of
13 Party Cisco Systems Inc. were Eugene Goryunov of
14 Haynes Boone, LLP and on behalf of Party Zilkr
15 Cloud Technologies LLC Jeff Stephens of Carter
16 Arnett Bennett & Perez PLLC.

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

22 Dated this 8th day of March, 2024, at Hillsborough
23 County in the State of New Hampshire.

24
25 

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