

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

3
4 SAMSUNG ELECTRONICS CO., LTD,

5 Petitioner,

CERTIFIED COPY

6 v.

7
8 DODOTS LICENSING SOLUTIONS LLC,

9 Patent Owner.

10 Case IPR2023-00621 (US Patent No. 8,020,083)

11 Case IPR2023-00701 (US Patent No. 8,510,407)

12 Case IPR2023-00756 (US Patent No. 9,369,545)

13
14 VIDEOCONFERENCE DEPOSITION OF

15 GEORGE KEMBEL

16 MAY 17, 2024

17 Page 1 - 68

8:34 a.m. - 10:17 a.m.

18
19 REPORTED BY:

20 KAITLYN B. HOUSTON

CA CSR No. 14170

21 Job Number 24-137041

BILLING FR Ref. 39843-0148IP1

22 39843-0149IP1

23 39843-0150IP1

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

REMOTE VIDEOCONFERENCE DEPOSITION OF
GEORGE KEMBEL, taken on behalf of the Petitioner,
commencing from 8:34 a.m. to 10:17 a.m., Friday, May 17,
2024, before Kaitlyn B. Houston, CA CSR No. 14170

1 **APPEARANCE OF COUNSEL:**

2

3 **On behalf of the Petitioner:**

4 **FISH & RICHARDSON P.C.**
5 **BY: MICHAEL BALLANCO, ESQ.**
6 **CHRISTOPHER VON GUNTEN, ESQ.**
7 **1000 Maine Avenue SW**
8 **Suite 1000**
9 **Washington, California 20024**
10 **(202) 783-5070**
11 **ballanco@fr.com**
12 **vongunten@fr.com**

9 **On behalf of the Patent Owner and Witness:**

10 **DAIGNAULT IYER LLP**
11 **BY: CHANDRAN B. IYER, ESQ.**
12 **8618 Westwood Center Drive**
13 **Suite 150**
14 **Vienna, Virginia 22182**
15 **(917) 838-9795**
16 **cbiyer@daignaultiyer.com**

14

15 **On behalf of Apple, Inc.**

15

16 **ERISE IP**
17 **BY: CHRISTINA CANINO, ESQ.**
18 **PAUL HART, ESQ.**
19 **717 17th Street**
20 **Suite 1400**
21 **Denver, Colorado 80202**
22 **(913) 777-5600**
23 **christina.canino@eriseip.com**
24 **paul.hart@eriseip.com**

20

21 **Also Present: Petitioner, Jyun Jin In**

22

23

24

25

THE SULLIVAN GROUP OF COURT REPORTERS

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

INDEX TO EXAMINATION

WITNESS: GEORGE KEMBEL

EXAMINATIONS	PAGE
Mr. Ballanco:.....	5

QUESTIONS INSTRUCTED NOT TO ANSWER

Page Line

NONE

INDEX TO EXHIBITS

EXHIBIT	DESCRIPTION	PAGE
	NONE	

1 Friday, May 17, 2024, 8:34 a.m.

2 --000--

3 All counsel present stipulate
4 that the witness shall be sworn remotely
5 by the court reporter

6 * * *

7 Whereupon, GEORGE KEMBEL, having been
8 called as a witness was duly sworn
9 to tell the truth, the whole truth,
10 and nothing but the truth testified
11 as follows:

12 EXAMINATION BY MR. BALLANCO

13 Q. Good morning.

14 Could you please state your name for the
15 record, sir?

16 A. George.

17 You want full name?

18 Q. Please.

19 A. George Andrew Kembel.

20 Q. Thank you, Mr. Kembel. Nice to be with you
21 this morning. Let me actually introduce myself for the
22 record. I realized I didn't do that.

23 My name is Michael Ballanco on behalf of the
24 Samsung petitioners in the -- in three IPR proceedings,
25 which I will read into the record. They are

1 IPR2023-00621, IPR2023-00701, and IPR2023-00756.

2 I am with the Fish & Richardson law firm, and
3 I'm joined on the Zoom this morning by my colleagues
4 Hyun Jin In and Chris von Gunten.

5 MR. IYER: And this is Chandran Iyer from
6 Daignault Iyer for Mr. George Kembel.

7 MS. CANINO: This is Christina Canino and
8 Paul Hart from Erise IP on behalf of Apple, Inc.

9 BY MR. BALLANCO:

10 Q. Mr. Kembel, how many times have you been
11 deposed?

12 A. Is -- this will be the first.

13 Q. Okay. Especially with it being your first
14 time, I'd like to go over a few ground rules so that
15 everything goes smoothly today. Okay?

16 And the first is I'd ask that when I ask
17 questions, for the sake of our court reporter, you
18 respond with an audio response rather than gestures or
19 head-nodding. I see you nodding your head a lot. I
20 would appreciate a "yes" or a "no" if it's a yes-or-no
21 question just to make the transcription easier.

22 Is that fair?

23 A. Yes.

24 Q. Okay. And, Mr. Kembel, you understand that
25 you're under oath during today's deposition?

1 A. Yes.

2 Q. And being under oath, you understand that the
3 testimony you give is the same as if you were in court
4 in front of a judge or a jury?

5 A. Yes.

6 Q. And is there any reason, medical or otherwise,
7 that prevents you from giving complete, truthful, and
8 accurate testimony today?

9 A. No.

10 Q. If that changes at all during the course of
11 the deposition, just let me know. Okay?

12 A. Are you asking me a question?

13 Q. Yeah.

14 Would you confirm that if that changes, you'll
15 let me know?

16 A. I will.

17 Q. Thank you.

18 If you ever don't understand one of my
19 questions, will you let me know and then I'll try to
20 rephrase it or re-characterize it?

21 A. Yes.

22 Q. Okay. If you answer a question, I'll -- I'll
23 take that as meaning that you understood it.

24 Is that fair?

25 A. Yes.

1 Q. Okay. We'll try to take breaks about every
2 hour, but if you need one before that, let me know and
3 I'll let you take one. Okay?

4 A. Sounds good. I did have -- I do have coffee.

5 Q. Right there with you.

6 A. Beautiful.

7 Q. And the only caveat I'll give is if there's a
8 question pending that I've asked you, I'll ask you to
9 answer that question before we take a break. Okay?

10 A. Okay.

11 Q. And the last thing I'd like to just mention
12 before we get going is, especially with Zoom, I'd ask
13 that you try to let me finish my question before you
14 answer it, and I will do the same with your answers. I
15 won't intentionally cut you off. I'll let you finish
16 your answer before I proceed to my next question.

17 Does that sound good?

18 A. Sounds like good etiquette.

19 Q. Okay. So, Mr. Kembel, do you know that I
20 deposed your brother yesterday in the same set of
21 proceedings?

22 A. Yes.

23 Q. And did you speak with him after he was
24 deposed yesterday?

25 A. No. He sent me a text that said he was done.

1 I just hearted it.

2 Q. Okay. And that was the full extent of your
3 interactions following his deposition yesterday?

4 A. Yes.

5 Q. And, sir, you understand that the proceeding
6 -- or proceedings, I should say, we're here about today
7 relate to patents that were filed by your former
8 company, DoDots, in the early 2000s, right?

9 A. I'm aware.

10 Q. And you submitted a declaration in those
11 proceedings?

12 A. Yes.

13 Q. I'd like to start by asking you, sir, what was
14 your -- what was your role in DoDots when the company
15 was active in the early 2000s?

16 A. I was founder and CEO.

17 Q. You were a founder -- a sole founder?
18 Co-founder with somebody else?

19 A. Co-founder.

20 Q. And who is the other co-founder?

21 A. My twin brother, John.

22 Q. And was there a division of responsibilities
23 between you and John for the company in any sort of way?

24 A. Yes.

25 Q. And what was that division?

1 A. I was CTO, and he was CTO -- I was CEO, and he
2 was CTO.

3 Q. Okay. Does that mean you were more on the
4 business side of things versus he was more on the
5 technology side of things?

6 A. That's a fair, like, generalization.

7 Q. Okay. What competitors did DoDots have in the
8 industry?

9 A. I'm sorry. I was clearing my throat, and I
10 did not hear your question.

11 Can you please repeat it?

12 Q. No problem at all.

13 What competitors did DoDots have in the
14 industry?

15 A. I'm -- I'm thinking on how to answer that
16 question.

17 There were alternatives for people to have
18 applications that had the functionality they needed and
19 places to get information that they needed. But
20 there -- at the time, there were not equivalent
21 offerings that we created, which is one of the reasons
22 why it was so successful.

23 So I would say no direct competitors.

24 Q. What offerings were out there that you were
25 trying to differentiate yourself from?

1 A. Well, we were -- we are creating a whole new
2 product category, so we weren't having to differentiate
3 from a nonexistent product category. That new product
4 category was providing alternative and expanded and --
5 solutions to things that the other available offerings
6 did not touch.

7 And I can give -- I can -- and if I had to
8 simplify it, it would be -- and it's hard to remember,
9 perhaps for most of us today who are very familiar with
10 the current app and app ecosystem that is so prevalent,
11 and it seems so obvious to us now, that was not
12 available then. And for those who were very active
13 in -- then, the world was a very different place, and
14 the primary technologies and products and offerings and
15 content that people were able to engage with were in
16 three fundamentally divided worlds.

17 One was the client software world where -- and
18 this is hard to remember then, too -- you would use an
19 application like a word processor on your desktop, and
20 to get that application, you would have to usually get
21 it in some physical media because it was very large in
22 file size. And that might be in a CD-ROM or something
23 else. You would install that software on your computer
24 if it wasn't already installed when you bought it, and
25 that took a long time. But it gave the developers and

1 the companies offering those solutions a lot of
2 functionality to offer the customers.

3 And one of the challenges to that -- and
4 that's -- the benefit is great functionality and direct
5 relationship to the customers. And one of the
6 trade-offs of that level of functionality was the
7 difficulty of continuing to keep that software current
8 and to work with current data.

9 And so there's this whole thing about, like,
10 software versioning, and you have to get the new CD and
11 all that stuff. But high functionality, cumbersome to
12 keep current and work with current information.

13 The second product market category, which is
14 totally different, was the merging web. World Wide Web.
15 And we can -- and it's important to distinguish language
16 here. We talk about the internet now as one big thing
17 because it has become more pervasive and infused into
18 our daily lives. It was not that way then. The
19 internet and the web were different layers.

20 The internet was under my network that
21 connected things. The web was the emerging
22 document-browser paradigm that sat on top of the web
23 that started to make content and documents available to
24 more customers and consumers who were somewhat unaware
25 of the internet network.

1 And so we're familiar with the browsers.
2 Netscape was a big one, and the emerging World Wide Web
3 where individuals and content developers and companies
4 could offer more content like documents -- in the form
5 of documents of web pages. And the thing that was
6 really exciting there was, all of the sudden someone
7 can, through a browser, open a page and get information
8 that was, like, immediate and relevant to, like, within
9 minutes, whether it's news or financial information.
10 And then that was connected to -- you could click on a
11 link, and it would take you to another page that had
12 information. And you can click on that link, and it
13 would take you to another page with information.

14 And that opened up, like, a library of the
15 world for people, and we started to get used to the --
16 and excited about the potential of having the most
17 relevant and timely information available to us that was
18 also available to a lot of people, not just few sources.
19 And "people," I mean individuals, developers, companies,
20 and all of that. And so that was massively new, and we
21 could feel that it would change everything, and we
22 didn't know exactly how.

23 That set of capabilities also came with
24 trade-offs. And that was -- that while the information
25 was new and available for a lot of people, it was hard

1 to organize. So it went through -- if you want to call
2 them "portals." Yahoo. You would go to one place to
3 get to all the places.

4 So because it was too much information to
5 organize, you had to go through an organizer. So you
6 didn't have as much access as one, so it took a while to
7 get to the places you wanted to go.

8 And, two, because it was organized on a
9 document-by-document model that you click through large
10 page by large page. While it had the freshness of
11 information, it was cumbersome from an application
12 functionality perspective.

13 But, again, it was solving for different
14 needs. Both worlds. So those were two very powerful
15 things that met some needs but had their trade-offs.

16 And then the third was an evolving computing
17 landscape where, you know, our desktops -- we could have
18 laptops. They were pretty heavy then, but they still
19 had big screens, and so you could use the document model
20 and large data. Like, heavy but highly-functional
21 software applications.

22 But then these phones were coming out who were
23 also able to -- or any mobile device. So -- like
24 smartphones, small tablets that weren't as powerful,
25 from a computing perspective, and didn't have the

1 resolution of the screen and had a low data connection
2 because it was going through the cellular network that
3 had the benefit of having a tether. You could -- like
4 mobile computing. You could bring some of your services
5 and products and content while on the go.

6 But it -- it -- you couldn't touch these other
7 worlds because you couldn't run, like, large format
8 applications, and you -- in a page-by-page model for
9 content was what -- a thousand times more cumbersome.

10 And so a whole new alternative world was built
11 with new operating systems, new software paradigms, new
12 software application offerings like -- and a whole new
13 mobile browser structure, which you had to -- so if you
14 were a -- if you were a company or anyone offering a
15 product or service or content, then you were a customer
16 and you wanted that product and service, that
17 customer -- you had to create three worlds and go
18 through -- the companies would create a, like, software
19 application to deliver that and then deal with all the
20 benefits -- gain the benefits of that but struggle with
21 the data freshness.

22 Then they would create a whole separate
23 offering, and you -- to, like, deliver media and the
24 content they had through the web, page by page. So they
25 would have the fresh content but struggle with any type

1 of application functionality, and then also lost the
2 direct contact with the customer because they had to go
3 through these portals. And then to meet the users as
4 they move from one device to another, they had to create
5 a whole other infrastructure of software to go on the
6 mobile devices and content to go on the mobile devices.

7 So from a user's perspective, they got what
8 they needed, but they constantly had to move between
9 these domains, which was cumbersome, and no one saw it
10 because no one really followed the user, but you felt
11 it. And from a company perspective, you had to build up
12 all these parallel redundant efforts -- different
13 development teams, different content teams, or different
14 organizational teams, which is very expensive and very
15 difficult to, like, have an integrative experience from
16 the writer side and an integrative experience for the
17 customer side.

18 And our solutions -- or new solutions with the
19 Dot and the Dot -- the way the Dot was defined gave --
20 you know, it gave -- reconfigured how all that happened.
21 A relatively elegant -- the orientation that was not
22 obvious to any of these worlds. If you stayed in any of
23 these worlds, it would not have been the path you would
24 have taken. Because on the application side, you'd be
25 solving for data size. On the content side, you would

1 be offering for, like, organizing information. On the
2 mobile side, you would be dealing with the limits of all
3 that.

4 It was not obvious that those worlds were
5 connected, and the elegant solution would reconfigure
6 all those things. That would, all of the sudden, allow
7 the provider to provide new offerings that had
8 application-like functionality, freshness of data, and
9 ability to move across devices without a lot of divided
10 worlds. And for a customer perspective, to have direct
11 access to their providers, high functionality, immediate
12 fresh content, and the ability to move.

13 This is the world we live in now, and we know
14 how beautiful it is, and we know the significance of the
15 markets. It's trillions of dollars that flow through
16 these ecosystems now. But that was all trapped and
17 locked in divided worlds.

18 Q. I appreciate that, Mr. Kembel. Let me try to
19 move you back up to a higher level just so I can make
20 sure we're all on the same page.

21 You had mentioned that there were three
22 general categories of product offerings available before
23 DoDots came around, right?

24 MR. IYER: Objection to form. Vague.

25 THE WITNESS: I'm not sure I understand your

1 question.

2 BY MR. BALLANCO:

3 Q. At the beginning of your last response, I
4 believe you had mentioned that there were generally
5 three buckets of prior product offerings that existed
6 before DoDots came around.

7 Is that -- is that accurate?

8 A. "Bucket" is -- "three buckets" is a strange
9 term. I'm not -- what I said, there -- you could call
10 them three market areas. Three -- three areas in which
11 the whole ecosystems of products were available. Three
12 technology worlds. Three customer base -- not just
13 three customer bases, massively different customer
14 bases. These are so dimensional and rich. To try to
15 simplify it like that is unfair, so I don't quite know
16 what you're pointing at.

17 I would say the world had great products and
18 services available through those three massively
19 different ecosystems, which were wonderful. But because
20 they were divided and no one recognized the
21 interconnected -- that there was a way to offer a
22 solution that reconnected people -- people who had
23 products and services to offer and customers who needed
24 them, and then in a -- in a new way, it created
25 tremendous barriers to value creation, user experience,

1 development of new offerings because of that division.

2 And so I wouldn't oversimplify those into
3 that. I would recognize the richness of those things
4 and the nonobviousness of the interconnected nature that
5 if you saw it differently -- and this is why no one saw
6 it. No one saw it differently. They were all looking
7 through their silos.

8 And the way John and I approached the inquiry
9 with our designing practices gave us a different way of
10 looking at this, which was user-centered and kind of
11 customer experience and offering-centered and a kind of
12 technique that allowed us to take different points of
13 view. And all of the sudden, like, we looked at it
14 sideways, and we saw something that no one else saw.
15 And by reconfiguring some things in a really elegant
16 way, it unlocked that whole thing.

17 And it was -- and that's how I would, like,
18 point to it is divided worlds, an elegant solution that
19 provided alternative pathways for an incredible range of
20 products, technologies, media, content, application
21 functionalities, reconnecting people who had to offer it
22 to consumers who wanted that.

23 Q. Okay. And I don't mean to oversimplify
24 things. I just want to use a term that we can all agree
25 on to describe these three -- should we call them

1 "market areas"? Is that a term you're comfortable with?

2 A. From a business perspective, you can say
3 "market." From a technology perspective, you would say
4 "technology." From a product perspective, you would say
5 "product."

6 So just seeking one term, I think, is maybe
7 not actually representative of the reality of the
8 situation. So I would say I would use all those terms.

9 Q. Okay. Well, let's talk about it from a
10 business perspective.

11 A. Great.

12 Q. If we're going to talk about it from a
13 business perspective, we'll use the term "three market
14 areas."

15 Is that an okay term to use for the business
16 side?

17 A. That sounds great. Yeah.

18 Q. Okay. So the three market areas that you were
19 described were, first, the client software paradigm,
20 second, the emerging web, and, third, the emerging
21 mobile device market; fair?

22 A. That feels fair. And I love the word "market"
23 from a business perspective and the word "paradigm" from
24 a kind of world view that holds more dimensionality.

25 So I -- I hear you hearing what I'm saying.

1 Q. I'm trying.

2 A. Yeah.

3 Q. Let's go back, then, first and dig a little
4 deeper into the client software market. Okay?

5 How did DoDots' solution improve upon the
6 existing client software market?

7 MR. IYER: Objection to form. Vague.

8 You can answer.

9 THE WITNESS: Well, can you -- can you give me
10 a more -- where I -- I'm struggling to understand what
11 you're pointing -- because I don't think we were trying
12 to solve an application soft- -- we were -- we were
13 opening a new product category, which had implications,
14 that brought the benefits of application software, like
15 functionality, to a world that didn't exist. We weren't
16 trying to, like, stay in the world of application
17 software.

18 BY MR. BALLANCO:

19 Q. And had the market recognized a need to move
20 away from the client software market to a new market
21 that you opened up?

22 A. The -- I'll say two things: Those folks in
23 the application software market were continue -- I don't
24 think felt the obviousness of that. They were -- from
25 the limits of it, they were trying to continue to offer

1 great application functionality and mitigate some of the
2 challenges around data file size, alternatives to
3 downloading softwares, staying current, how to keep the
4 information that those software packages were dealing
5 with current. I don't think they recognized that there
6 was a way to solve that from a completely different
7 angle.

8 When we offered a whole new product category,
9 they're like -- like breath of fresh air. They're like,
10 "Thank goodness. We can offer the richness of
11 functionality that our customers need that we can offer
12 through application software and also new functionality
13 and" -- "with relevant, timely information that they
14 also need with a kind of lightweight nature that allows
15 us to keep things" -- "the whole thing current from a
16 software side, a content side, a functionality side."

17 So when the -- when the new-to-the-market and
18 not obvious solution -- when we came out with the Dots
19 and the Dot information as an alternative architecture
20 that was across all three paradigms, reconnected all
21 three paradigms, you could feel the immediate "yes" to
22 that. This is the thing that's, I think, wonderful
23 about new inventions is they're not obvious until they
24 came out, and then they're obvious. And so it was not
25 obvious, not obvious, not obvious. We put it out there,

1 and they're like "There it is."

2 And we saw that from the companies, whether
3 they're ABC News or Merriam Webster and all the other
4 companies that very quickly said yes and purchased,
5 like -- like, spent their money to pay for the
6 participation to use this new technology and the way
7 they talked about it. We saw that first from the
8 investment and finance community who are very familiar
9 with the emerging tech landscape across all those
10 paradigms and investing in all those paradigms that they
11 saw how unique and new this was and unexpected, and how
12 it unlocked latent value that is in the market wanting
13 to happen but had no invention pathway to go through.

14 The moment this came out, the nature of the
15 way the Dots were built and the nature of the way the
16 Dot definitions were, it unlocked all the latent value.
17 And so they saw that, given their expertise as investors
18 in understanding the landscape from a market,
19 technology, entrepreneur, business, business product
20 offering, so they choose to invest in our start-up,
21 validating that it was a new thing that was not out
22 there. If we didn't have a new thing, they wouldn't
23 have invested in it. If we didn't have a new thing that
24 unlocked value that was stuck in the market, the
25 companies wouldn't have paid for it.

1 And -- and then the rapid uptick of people --
2 of saying, "Yes, I can finally use this," the users that
3 were also bringing this into their lives and started to
4 do the things they needed to do in the way they did as
5 opposed to in this compartmentalized, multi-world way.

6 And then maybe two more. The way the
7 developers jumped on this and opened all new markets
8 about new offerings. And then even, like, the
9 conferences and the analysts who were pointing to its
10 success.

11 So those, to me, are the things that suggest
12 that it unlocked that great value.

13 Q. And was -- strike that.

14 The folks working in the client software
15 market, in your view, hadn't appreciated that there
16 might be a solution to the problems they were trying to
17 address within their market by a whole new product
18 offering?

19 MR. IYER: Objection to form. Vague.

20 THE WITNESS: What do you mean by don't
21 appreciate? Help me understand your question.

22 BY MR. BALLANCO:

23 Q. Sure.

24 So there were companies and individuals
25 working in the client software market and trying to

1 improve their offerings in that market, right?

2 A. That would be true for most markets. But they
3 didn't see -- they didn't see an alternative. They saw
4 the problems from their lens.

5 So they saw the problems of data file size, so
6 they were coming up with new ways to reduce or
7 distribute data file size. They saw problems of
8 application data current -- freshness. Like how current
9 the data was. Were trying to solve it that way. They
10 didn't recognize that there was a -- an alternative,
11 elegant solution that -- that -- that brought, like --
12 it sat on the internet, the underlying network, in a
13 different way that allowed for the functionality that
14 was held over in the -- that we could see in the web
15 space but couldn't unlock. It could bring some of --
16 and could see in the space but couldn't unlock from this
17 side, and could see in the mobile market but couldn't
18 unlock in this space. It was not obvious.

19 They couldn't see -- it wasn't like they
20 didn't appreciate it. They were efforting, like, to try
21 to solve the problems from the vantage point from where
22 they're at. And those are all legitimate solutions.
23 There are other things out there that were working on
24 these -- these -- these small parts of the puzzle.

25 What was -- I don't think it's a lack of

1 appreciation, in your language. It's just they had
2 no -- they couldn't see that there was an alternative
3 because there wasn't. There was not an alternative that
4 provided a third way that -- that solved for, like,
5 eight different problems at once and then reconnected --
6 reconnected them to their customers. The moment they
7 saw it, they were like, "Oh, yeah."

8 And that's what you see, I think, in my
9 declaration. I pointed to case after case after case if
10 you want to reference that or we can talk about it. We
11 can get very specific examples of the companies who
12 had -- who had application software offerings and web
13 offerings and mobile offerings. The moment they saw a
14 third way that unlocked kind of functionality that was
15 available in these separate worlds in a third world,
16 then they appreciated the new offering. But it
17 wasn't -- there was no alternative before.

18 Q. You mentioned that your solution solved eight
19 different problems at once.

20 What were those problems?

21 A. So the number eight was a -- I just threw that
22 out to suggest that there were a number of problems, and
23 the -- most of the markets and those different paradigms
24 were focused on point problems and point solutions. And
25 some of the big shifts in markets and novel

1 inventions -- kind of because they take a different
2 angle, unlock a constellation of needs that weren't
3 recognized to be connected, and solve a constellation of
4 problems that weren't recognized to be connected, and
5 solve a constellation of solutions that weren't
6 recognized to be available.

7 So I don't know if eight is a precise number,
8 but I can highlight what some of those key needs were.

9 Is that what you're asking?

10 Q. Yes, please.

11 A. And we talked about this already. Let me see
12 if I can simplify it. Or just pull that -- the
13 specifics forward.

14 And these can be focused on from, like, a need
15 and perspective problem or a latent need that was there
16 for a long time but nothing was available. Latent needs
17 are interesting because you can feel them, but you don't
18 know how to solve them. You might not even have
19 language for them. And they can exist for a very long
20 time.

21 And then there might be actual challenges that
22 are faced that are solved. And then I also feel that --
23 that sometimes you're just -- by addressing a latent,
24 unmet need or solving a specific problem, another way at
25 it is you unlock an opportunity that you didn't see was

1 there before. So it's like opportunity creation as
2 opposed to problem solving. So I think of it in all
3 those ways.

4 So -- and the other interesting thing about
5 some of these new-to-the-world kind of solutions that
6 aren't out there, you're solving multiple needs,
7 creating multiple opportunities, and offering multiple
8 solutions across multiple stakeholders. So those who
9 had products and services to offer, that's one
10 stakeholder. They had a set of needs and a set of
11 opportunities they were trying to unlock. And that
12 could be content providers, functionality providers.
13 These are, like, the big companies that we mentioned --
14 that I mentioned in my declaration, and they were our
15 customers on the provider side.

16 There's a set of needs and problems and
17 opportunities that are unlocked from the developers.
18 They may be inside a company, or they may be
19 independent.

20 And then there's a set of needs and
21 opportunities that are felt by the customers. The --
22 the people who use the Dots and the Dot on their
23 devices, whether it was a computer, a laptop, or a
24 phone, and they had a set of needs and opportunities.

25 And that's one of the things I think is so

1 exciting about this shift that was not obvious is by
2 taking a sideways glance and providing an elegant
3 alternative in the middle, it unlocked all of those in
4 kind of a single slice that no one saw because they were
5 only standing on part of it.

6 If I had to inventory -- which I think is what
7 you're asking -- I'll be representative, but not
8 complete. I can just give some examples, and we can go
9 to those if they're helpful. But they are -- they are
10 very big. You can state them in very big ways. Like
11 whole new channels of commerce is available, or whole
12 new channels of media is available, or whole new
13 channels of, like, application functionality is
14 available. So there are macro ways to talk about it,
15 and there are very micro ways to talk about it.

16 Like, you had a lot more flexibility on how
17 you used the functionality on your desktop than you did
18 in a web document model, or you were able to brand the
19 whole experience as opposed to be stuck in the window of
20 a browser. Or, as a customer, you're able to move from
21 device to device and continue to pick up on the product
22 or service or experience you're having as opposed to
23 have these different worlds. Or a developer who was
24 able to develop in one way and meet all these needs as
25 opposed to have to devolve four different platforms.

1 So those would -- I would -- I would describe
2 the specific needs, problems, opportunities, and the
3 unlocks of value in those categories. Like, macro,
4 micro, and across all those different customer -- or
5 stakeholders.

6 And usually -- I think that's a -- I think
7 I'll stop there.

8 Q. Okay. Let's -- let me see if I can unpack
9 that a little bit, and then you can dive into maybe each
10 of them.

11 I understand you -- your -- your contention is
12 that DoDots addressed latent needs for three different
13 stakeholder groups: Providers, developers, and
14 end-users. Right?

15 A. That's fair. And in each of those, you could
16 double-click and say "What kinds of providers are
17 there?" It's like financial, like productivity
18 providers. There's news information providers. There's
19 financial services provider. And then you could say
20 there's some who lean more on delivering content to
21 inform your work. There's others who deliver tools to
22 inform your work. So -- and the same thing; you could
23 double-click on those other areas, like end users.

24 Q. Okay.

25 A. And that's something I think that was magical

1 of this solution is it unlocked those latent needs for
2 that diverse set of constituents.

3 Q. Let's start with providers.

4 A. Yeah.

5 Q. What latent needs did DoDots solve, at a macro
6 level, for providers?

7 A. I think I articulated them very succinct.
8 Like, if you want a succinct answer, I articulated them
9 very succinctly in -- what is it called? -- the
10 declaration. This is the deposition. In the written
11 document that I provided, if you want to use that as a
12 reference.

13 Q. I'd just like to hear from you so we can have
14 a conversation about it.

15 If you can identify the latent macro needs
16 that DoDots solved for providers, I'd be interested in
17 hearing it.

18 A. And I would like to be accurate and precise as
19 opposed to just generalized and estimating.

20 So if we could use that as a reference, let's
21 do that.

22 Q. Okay. Before we get there, you're not able to
23 identify those without using your declaration?

24 A. I want to --

25 MR. IYER: Objection to form. Asked and

1 answered.

2 Go ahead. You can answer.

3 THE WITNESS: I think you entered an
4 objection.

5 Say that again.

6 MR. IYER: I said "asked and answered."

7 THE WITNESS: Yeah. I'm not comfortable
8 guessing or being general. Let's be accurate and
9 precise because you keep asking me questions, so let's
10 be precise.

11 BY MR. BALLANCO:

12 Q. Okay. And you can only get to that level of
13 precision by looking at the declaration that you
14 submitted in the case, right?

15 MR. IYER: Objection to form. Asked and
16 answered.

17 THE WITNESS: I don't feel comfortable --

18 BY MR. BALLANCO:

19 Q. You can --

20 A. I didn't hear that.

21 Q. Yeah. The objection is actually for the
22 record. You can answer my question. You actually need
23 to answer my question, regardless of the objection
24 raised by your counsel.

25 A. I hear us generalizing, and you keep asking

1 specific questions. I want to be able to answer very
2 succinctly. I spent time in the document to highlight
3 the very specific things.

4 I don't feel comfortable guessing. I would
5 like the reference, and you can walk me through those
6 things, and I can point you to those things so we can be
7 accurate.

8 So I don't feel comfortable continuing to
9 speculate.

10 Q. You would have to speculate as to the answer
11 to the question I just asked unless you were looking at
12 the declaration that you submitted in this case. Right?

13 MR. IYER: Objection. Asked and answered.

14 But you can answer.

15 THE WITNESS: I'm still confused because this
16 is like -- feels like repeat, so ask me the question
17 again.

18 I have asked for the document so I can be
19 accurate. Yes. And I am -- I'm not comfortable
20 continuing to answer in a broad way because it doesn't
21 seem to be giving the answers that are needed.

22 So I'm asking for the document and for us to
23 use that as a tool and proxy for us to -- because I put
24 it in the document.

25

1 BY MR. BALLANCO:

2 Q. Okay. One of the things you had mentioned
3 before is for the web browser market. It was a wildly
4 new market.

5 Do you recall that?

6 A. I don't think I used the word "wildly" unless
7 you can point me to that on my documents. And I don't
8 recall saying that.

9 I would say it was new.

10 Q. Oh, I apologize. I believe the term you used
11 was "massively new."

12 Does that sound familiar?

13 A. I don't remember what specific words I used,
14 but I think we all felt it back in -- when that was
15 coming. And everyone felt it, from the investors to the
16 companies to the users. This incredible wave of an
17 entirely new way to engage with information that -- and
18 we could feel it in our bones, that it would change
19 almost every part of our life. And -- in ways that we
20 could barely imagine but we could sense.

21 Q. Okay. And when you're describing that
22 feeling, could you tell me the time period you're
23 talking about that you felt that?

24 A. Well, for -- it started in the -- well, it
25 impacted different people in different time frames.

1 Are you asking me when I felt it, or are you
2 asking, from a business and entrepreneurial perspective,
3 when the market started to feel that?

4 Can you help me understand your question?

5 Q. Let's start with you.

6 So when did you feel that the internet and web
7 browser market would change the way that people consumed
8 information?

9 MR. IYER: Objection. Form. Vague.

10 You can answer, though.

11 THE WITNESS: I think I'm -- this is -- what?
12 25, 30 years ago? So it's -- for me to give an answer,
13 like, on Tuesday on -- that would be too precise. And I
14 can't -- I can't remember the specific date.

15 It was, like, a general rising tide, and
16 the -- I could feel it in many years prior to John and
17 my's start -- starting DoDots prior to that. Because
18 you could feel it in the computing -- like, the way
19 email was working across the internet and the awareness
20 of the emerging network, the internet underneath.

21 And then the emergence of, like, browsers and
22 how that allowed for different type of document creation
23 including, like, keeping our design journals and, like,
24 web pages that we authored and, like, feeling that to
25 seeing new offerings starting to come out in the web

1 pages and all the new start-ups that were emerging from
2 shopping to news to finance to all search engines all
3 coming through these new web browsers, and then the rise
4 of all new companies, like Netscape.

5 And so these were unfolding over many years.
6 This kind of growing tide. And 1997 was when John and I
7 graduated from our masters design program, and we had
8 already been playing with both technology --
9 technologies for our own work and for our own invention
10 ideas, and we had been practicing a lot of these design
11 practices around emerging behavior, and we decided to
12 start a company to invent new technologies and products
13 and do consulting.

14 The consulting was just to pay for the office
15 and food, but we were -- we were in the -- we were in
16 Silicon Valley, alums of Stanford University. My
17 professors who taught business and design, we could feel
18 the edges of, like, potential.

19 And so from the years of my graduate work to
20 before to the years after starting the company and
21 then -- it was -- it was when you could really feel it.
22 In fact, John and I made a very distinct decision, you
23 know, like, when we're grandparents and our grandkids
24 ask us "Remember the time when the internet, like,
25 emerged, what did you guys do?" We didn't want to say

1 that we stayed in a big company and watched it happen.
2 We wanted to be in it and see what was possible.

3 And that was in those years. That kind of
4 growing awareness, the recognition of watching what's
5 happening, the enthusiasm, all the new functionalities
6 and capabilities were coming down the line. The
7 latent -- the latent needs that were there wanting to be
8 met but not sure how to be met because of the paradigm
9 shifts that were starting to show themselves and the
10 intuition, that that was something worth going after.

11 And then our design practices that allowed us
12 to kind of intentionally crack open an inquiry into the
13 nature of these opportunities from a business
14 perspective, from a technology perspective, from a
15 design perspective, from a consumer experience
16 perspective. And I think that's one of the things that
17 was the unlock.

18 There are a lot of people out there, like,
19 with the excitement and just making things without a
20 full awareness or way to see differently and a lot of
21 people out there trying to, like, bring these things
22 into their lives without awareness of, like -- without
23 having solutions available to them that would solve
24 their needs.

25 The thing that we had that I think not many

1 people did was we had a regular design practice that
2 helped us pick away at all these different dimensions of
3 the paradigms. And I think that's one of the things
4 that's all very exciting about John and I as twins and
5 with our bases as being -- we both have a design
6 philosophy center, and we both have competencies in,
7 like -- from engineering to business. I leaned more
8 engineering; he leans more business, but we can
9 appreciate those worlds.

10 But having that design practice help us to
11 continue to disrupt any biases and assumptions and ways
12 of looking at things that would keep our vantage points
13 siloed. And that's what I think was a massive -- is a
14 confluence of events between the emerging rising tide,
15 the recognition of all the new world opportunities, the
16 pent-up needs that all these different stakeholders had
17 but couldn't solve, and the blind spots everyone had
18 because they only saw from one vantage point, and the
19 practice that we had to kind of invoke new ways of
20 seeing.

21 And it was -- when that happened, we were like
22 that's -- "That's the thing to go after," and we built
23 it and wrote the business plan within a matter of
24 months. It was very fast.

25 But it would be in the '90s, if you want to do

1 a broad arch, a rising tide. And we can talk more
2 succinctly on specific dates if you want to know "When
3 did you graduate?" and those things, I think, if
4 helpful.

5 But I would say that was -- and at one point,
6 we could feel the moment to move, and it happened to be
7 really beautiful timing when it -- no one else had any
8 offering like that. It was not obvious to people. The
9 moment it was seen, it was recognized by the investors
10 and the customers and the companies and the conferences,
11 and it was, like, pulled into the market. Like, it was
12 quite -- it was -- it was really thrilling because that
13 continued to open up from there.

14 And I would say maybe one more thing. It's
15 still going, right? Like, it continue -- what is it? I
16 think I'm going to estimate -- I don't like estimating.
17 I wrote it in the declaration. Like -- something like
18 two-thirds of the world's population use, like, smart
19 devices. Something like -- if we want the specific
20 numbers, we can go onto the declaration. Majority of
21 the use is on apps. And the amount of solutions and
22 value pulled through these ecosystems is, like, hard to
23 even imagine. It's become such a way of life.

24 And -- and so we could feel it then. We
25 could -- and the -- and the breakthrough of disrupting

1 our own ways of seeing so we could see something that no
2 one else saw was the unlock. It just happened way
3 before everyone else because they didn't have those
4 practices.

5 MR. BALLANCO: We've been going about an hour.
6 Now's a good time for a break.

7 Let's come back in ten minutes, okay?

8 MR. IYER: Sounds good. Thanks.

9 MR. BALLANCO: All right.

10 (Recess taken.)

11 BY MR. BALLANCO:

12 Q. Mr. Kembel, how important was the visual
13 design of the Dots to DoDots' success?

14 MR. IYER: Objection to form. Vague.

15 THE WITNESS: Can you -- can you be -- can
16 you -- I'm not sure I understand what you're getting at.

17 BY MR. BALLANCO:

18 Q. Sure.

19 So the -- the Dots that DoDots made available
20 to the market had a certain aesthetic to them; is that
21 fair?

22 A. So I don't think of these things in, like,
23 singular dimensions in the way I hear the question
24 coming. Like, to say the success was based on how it
25 looked would be incomplete. The visual -- some of the

1 visual -- some of the attributes that had visual
2 implications were different -- were part of what helped
3 the companies offer more direct experiences, and that
4 was one ingredient of many ingredients of why it was
5 successful.

6 Q. And I didn't mean to suggest it was the only
7 ingredient, but the visual component was one ingredient
8 that helped make DoDots successful, right?

9 MR. IYER: Objection. Form. Vague.

10 THE WITNESS: That feels like a -- I don't
11 think of success in that way. It's -- the -- the way
12 the visual -- way the providers could express their
13 offerings visually and the way the customers would
14 experience these visually was something that was
15 unavailable and made in other formats, and that's what
16 made it -- one of the elements that made it possible for
17 the companies or the providers, as you mentioned them,
18 to offer new solutions.

19 But -- and new kinds of offerings that weren't
20 available in these other worlds. And that, as you
21 mentioned, one of the factors that made this desirable
22 for those all different stakeholders contributed to part
23 start of its success. But there were many other -- many
24 other components.

25 But, yeah, it was visually unique.

1 BY MR. BALLANCO:

2 Q. Sir, tell me about the process you used to put
3 together the declaration you submitted in these
4 proceedings.

5 MR. IYER: Just before he answers, I'm just
6 going to caution the witness to not divulge any
7 information that's protected by the attorney-client
8 privilege.

9 But you can generally answer that question.

10 THE WITNESS: So ask me the question -- what
11 process I used?

12 BY MR. BALLANCO:

13 Q. Yes.

14 A. Well, there was -- I'm unfamiliar with this
15 whole process, so the -- it was explained by our counsel
16 what a declaration was. I had questions about whether
17 or not John and I could, like, co-write a single
18 declaration because that felt more in the spirit of the
19 way the inventions emerged, the combination of our
20 points of view, and it's -- it sounded unconventional to
21 have a co-written declaration. So then it -- it -- it
22 felt like having two declarations was the way that fit
23 into the process.

24 So then there was the question of, like,
25 "Well, how do we cover all the bases?" I leaned more on

1 the business side, so then I -- I didn't know much of
2 this process, but understanding a little bit about what
3 kind of things would express and support the DoDots'
4 story in terms of, like, customers and market successes
5 and the needs that they saw, then recognition in the
6 market and those sorts of elements were part of the --
7 part of the story. So then I -- the -- some of that was
8 explained to me by the counsel, and then the question
9 was how to pull everything together to tell my story.

10 So we -- we had all sorts of documents, like,
11 big bins of, like -- John and I happened to keep great
12 design logbooks and then everything from, like,
13 printouts of an email from like John Koznick [phonetic]
14 when he made an introduction to press articles to
15 analyst's reports and conference reports and conference
16 things to invest, or press releases. And then it was
17 just creating a document that started to try to tell
18 that side of the story. John had his whole process that
19 was different, and he covered more of the technology. I
20 covered more of the market and business perspective.

21 Q. You collaborated, though, with John in putting
22 together your declaration?

23 A. No. We talked about -- we talked about who
24 would tell what part, and I sat and did my -- my -- my
25 side of the story.

1 Q. All right. What -- what review of the patents
2 at issue in these proceedings did you undertake in
3 putting together your declaration?

4 A. I didn't -- I didn't review the patents for
5 the preparation of the declaration. I was -- as we
6 mentioned -- as I mentioned, I was orienting to the
7 business side. So I was reviewing all the press
8 releases and the market documents and things like that.

9 Q. Okay. Did you endeavor to relate the market
10 successes you described in your declaration to the
11 patent claims of the patents at issue in these
12 proceedings?

13 MR. IYER: Objection. Form. Vague.

14 THE WITNESS: I'm -- I'm not a patent expert.
15 What I can talk about -- and I did in the declaration if
16 you want to point me to specific things in the
17 declaration, I can talk to them. I endeavored to
18 communicate what about the Dots and the way the Dots
19 were defined, how that contributed to a -- how we
20 started our company, why we started our company, what we
21 offered to the market, how it was received by the
22 market, how it was received by the investment community,
23 how it was received by customers.

24 And so that's the connection point is because
25 of the way these paradigms were existing, there was

1 nothing out there that solved the collection of needs,
2 and we saw it differently, and because we saw it
3 differently and the Dot came out. And the way Dots were
4 in the Dot definitions were that what unlocked those
5 paradigms and allowed all the latencies to be expressed.

6 So the connection is if that wasn't -- if that
7 wasn't new, and if that wasn't -- if that wasn't new,
8 then it wouldn't have been pulled into the market so
9 fast. And if it was obvious, it would have been out
10 there before. And that's the connection between, like,
11 the market success, the panelist recognition, customer
12 use, all that stuff. That's what I was endeavoring to
13 connect, and we can point to very specific examples, if
14 you want.

15 BY MR. BALLANCO:

16 Q. Well, let me understand how DoDots' patent
17 portfolio worked.

18 You had many patents; is that fair?

19 A. I -- yes, I understand there are a number of
20 patents.

21 Q. There were more patents beyond the three that
22 are at issue in this proceeding?

23 A. There are more than three patents that I
24 understand.

25 Q. And I know you're not a patent lawyer, but

1 generally, you understand that, you know, different
2 patents relate to different portions of the invention,
3 right?

4 MR. IYER: Objection to form. Vague.

5 THE WITNESS: I can talk about, like, our
6 invention -- I can talk about what we were creating and
7 about the Dots and the way they're used by customers.
8 I'm not a patent expert of how they're constructed in
9 documents, and so I'm not the one to talk about that.

10 BY MR. BALLANCO:

11 Q. Right. So in other words, you're not able to
12 connect your market successes to the specific claims of
13 a particular patent, right?

14 MR. IYER: Objection to form.
15 Mischaracterizes testimony.

16 THE WITNESS: I can -- I can connect -- I can
17 make the connection between the Dots and the Dot -- and
18 how they -- and the nature of the product and how we
19 developed it, and why they're successful, and that's
20 what I did in the declaration. The rest felt unfair.

21 BY MR. BALLANCO:

22 Q. I'm sorry. What felt unfair?

23 A. Your characterization of, like, unable to make
24 some connection. Yeah.

25 Q. Right. Well, in your declaration, you didn't

1 associate the successes in the market with the specific
2 claims of the patents at issue in this proceeding,
3 right?

4 MR. IYER: Objection to form. Document speaks
5 for itself.

6 THE WITNESS: I'm happy to talk about, like,
7 the declaration and the -- the -- the connection between
8 the Dots and the offering and the things that we made,
9 to the market successes, to the way it was recognized,
10 to the needs that they solved, and that, I think, is
11 what we're here to talk about.

12 BY MR. BALLANCO:

13 Q. Right. In other words, your declaration
14 associates the market successes to the product that was
15 offered, right?

16 MR. IYER: Objection to form. Vague.

17 And once again, Counsel, Mr. Kembel has
18 already said to you before that he's not comfortable
19 just guessing on what his declaration says, but you keep
20 asking me about his declaration without giving him the
21 actual declaration. So I object to this whole line of
22 questioning.

23 BY MR. BALLANCO:

24 Q. Okay. You can answer the question, sir.

25 A. If you want to -- you're making -- you're

1 making statements about the declaration. I don't know
2 what you're pointing at, and so it's hard for me to,
3 like, show up and understand what you're -- so if you --
4 I would ask for these types of things to put the
5 declaration on the table, and let's walk through some
6 things if you have questions about them.

7 Q. Okay. You mentioned Tom Koznick who was an
8 early investor of DoDots; is that right?

9 A. He was not an investor, but I did mention him.

10 Q. Okay. What was his role?

11 A. He was a professor of mine. He taught at
12 Stanford and at Harvard. He's taught, like,
13 marketing -- more the business classes. Technology,
14 market venture startups. And I took his classes in
15 addition to the design classes that I took. And when --
16 when John and I were -- after -- when John and I were
17 then starting to look to how we introduce this to the
18 investment community, I asked Tom if he could make any
19 introductions. And to do that, I went and met with him
20 and showed him the demonstration and showed him the
21 technology and showed him how it worked and showed him
22 the business plan, and he was so excited that he made
23 the connections like this. And one of the connections
24 he made were one of the things that resulted in our
25 initial round of financing.

1 Q. And were there others at Stanford who assisted
2 in a similar way?

3 A. I don't -- that was a long time ago. What --
4 so in terms of making introductions, the one I remember,
5 I just said. Like, Tom was the one I -- I went to
6 because I knew him well and he knew the community of
7 marketing and startups, and he knew the investment
8 community and knew the market. And so he would be great
9 for feedback and on the business side as well as
10 connections and introductions.

11 So that's what -- that's -- and he -- he was
12 the one who made introductions to what became our
13 investors.

14 Q. What -- what was the largest amount of
15 concurrent users the DoDots platform serviced at one
16 time?

17 A. I -- that's a question I can't answer. One,
18 that was so long ago; and two, I -- I -- that feels like
19 a technical answer based on some other part of the
20 organization that might be able to answer that.

21 Q. Okay. Would that be something John would be
22 able to answer?

23 A. That's me speculating. I have no idea.

24 Q. Okay. How many Dot developers existed at the
25 peak of DoDots?

1 A. I don't know the -- the total number. It was
2 not the focus of my declaration. So that would be me
3 guessing. I don't feel comfortable guessing.

4 Q. How many content providers utilized the Dot
5 technology?

6 A. I also don't know the -- the exact number. I
7 gave examples of many of the significant ones that were
8 represented of the kinds of solutions that were
9 available in the declaration, and I'm happy to talk
10 about those specifically, but you can reference that.

11 But they were -- they were significant movers
12 in the industry. So I focused on those as a way to
13 demonstrate the success.

14 Q. Okay. And do you have a best guess of how
15 many content providers there would have been? I know
16 you provided representative ones, but do you have a --

17 A. My interest is to be accurate. You keep
18 asking me to guess and speculate. I don't feel
19 comfortable doing that. If you want to -- I'm not going
20 to guess. I'm happy to talk about the specific
21 representative ones that I mentioned in my declaration.

22 Q. Okay. Well, in putting together your
23 declaration, could you have identified all of the
24 content providers that used Dots?

25 A. I -- I don't -- I don't even know if I have

1 access to that information. It was so long ago. I drew
2 on the information, which was pretty extensive, what we
3 had kept. So -- so it was not my effort -- it was not
4 my intention to do that.

5 Q. What profit did DoDots make?

6 MR. IYER: Objection. Form. Vague.

7 THE WITNESS: Can you help me understand what
8 you're trying to get at with your question?

9 BY MR. BALLANCO:

10 Q. Yeah. Was DoDots ever profitable? Did it
11 ever make a profit?

12 MR. IYER: Objection to form. Vague.

13 THE WITNESS: I didn't provide the financials,
14 and it was a long time ago for -- to make a specific
15 ask. Our focus was on raising the money that we needed
16 from investors to build the organization, selling a
17 product offering to customers who paid, building a team
18 of incredible talent, expanding into new markets,
19 building awareness. And so our -- our funds went to
20 that. I don't have access to the financials to be able
21 to tell you the specifics of that. The --

22 BY MR. BALLANCO:

23 Q. Sitting here today, you can't tell me whether
24 DoDots ever turned a profit?

25 MR. IYER: Objection to form. Vague.

1 THE WITNESS: I'm happy to look at any -- any
2 of the financial documents, but I didn't -- I didn't put
3 them in -- into the declaration. So I would only be --
4 I would only be guessing. And I've told you I'm not
5 comfortable guessing.

6 ///

7 BY MR. BALLANCO:

8 Q. Okay. So your testimony here today as a
9 co-founder and CEO of DoDots, you're unable to tell me
10 if the company ever turned a profit?

11 MR. IYER: Objection to form. Asked and
12 answered.

13 THE WITNESS: Well, my focus is what I'm
14 telling you is that the customers who -- there are a lot
15 of companies that are highly successful in the early
16 days that are not profitable for some time because
17 they're making an investment choice to invest in new
18 markets and capacity buildings and create new offerings.
19 And then it's a timing decision about how they navigate
20 that about when to profit. So we were navigating
21 similar decisions with -- I don't recall the -- all the
22 financial specifics. I can tell you where our focus on
23 our investment was, which I have. And I'm happy to look
24 at any financials, if you want to walk through those.

25 But the thing I want to say is that -- in

1 those early formation days, the economic movement is
2 a -- is an indicator of success. So the financial
3 movements are -- it is investment capital coming in and
4 significant investment capital from some of the most
5 elite investment firms from, like, Soft HR Capital,
6 Chase EX, New York Funds. And then the next thing that
7 we focus on is, like, customers. Are companies paying
8 for it? And they were paying for it, and they were
9 putting their dollars in as revenue. They were putting
10 their team and efforts in, and they were offering new
11 products. So that's where our focus is in terms of the
12 capital movements. So if you want to look at economic
13 movements for success, that's where our focus was. And
14 that was for our -- for our stage of development, it was
15 -- it was considered, like, deeply value creating and
16 highly evidencing of the -- of the market opportunity.

17 Now, in terms of the proportions of capital
18 expense and others, like, profit was not our focus, and
19 I'm not here to -- at that time, our focus was on
20 investment and capacity building and growth and market
21 creation and customer acquisition and development in the
22 offerings.

23 BY MR. BALLANCO:

24 Q. I understand profit might not have been your
25 focus. My question is: Did you turn a profit? Yes or

1 no?

2 A. I -- I -- I -- it was like 25 years ago. And
3 I would only be guessing. It was not included in my
4 declaration because I didn't pull the financials. And
5 I'm telling you I'm happy to look at all the financials
6 so I can give you an accurate answer. So I'd like to
7 give you an accurate answer, and if you'd like to pull
8 the financials, I'm happy to do that, but I'm not going
9 to guess.

10 Q. Did you provide those financials with your
11 declaration?

12 A. Show me the declaration. I believe you have
13 it. Show me the declaration. I will talk you through
14 all the things that were included.

15 Q. Well, if the financials weren't included in
16 the declaration, then can you get them for me now?

17 A. I -- I -- I don't believe I have -- I would be
18 guessing that, too. We went through all of our
19 documents and provided all the information and included
20 what was -- felt relevant to telling the story about
21 what we did in the market in the declaration.

22 Q. And whether the company was profitable was not
23 something that you considered relevant for describing
24 its market success, right?

25 MR. IYER: Objection to form. Vague.

1 THE WITNESS: What I considered relevant was,
2 like, the evidence of how it was received in the
3 investment community. This is early stage. How it was
4 received in the investment community and their
5 perspectives, which I'm happy to walk through the
6 specifics which are included in the declaration. How it
7 was received in the customer base and their investments
8 and how they talked about it, which I'm happy to walk
9 through. How it was received in the analyst market and
10 in the press, that's where my focus was.

11 And those are the early indicators of these
12 markets of commercial success.

13 BY MR. BALLANCO:

14 Q. Which investors declined to invest that you
15 approached?

16 MR. IYER: Objection to form. Vague.

17 THE WITNESS: We were -- we were -- what
18 was -- we were in choice about multiple investors. And
19 so, for example, our first round, we chose to go with
20 SoftBank when we had multiple options because of the
21 strength of their network and the alignment of their
22 philosophy and the number of the board.

23 BY MR. BALLANCO:

24 Q. When you say you chose to go with SoftBank, do
25 you mean they were the only investor that you

1 approached?

2 A. They were not the only investor we approached.
3 Like I mentioned, we had multiple offers and we chose to
4 go with SoftBank.

5 Q. Okay. Were there investors you approached who
6 didn't make you an offer?

7 A. That's always the case.

8 Q. Okay. So that was the case here, right?

9 A. Yes.

10 Q. Okay. Who were those investors that you
11 approached that they didn't make you an offer?

12 A. I don't have -- I don't have the list of all
13 of the firms that we pitched. And so I -- I don't think
14 I can give you a list. But it's fair to say that we
15 pitched multiple investors and we -- some of them, we
16 chose not to pursue and continue in meeting. Some they
17 chose for whatever reason we don't know. And then the
18 multiple offers we got, we chose to go with SoftBank.
19 And that's very normal.

20 Q. What percentage of the investors you
21 approached made offers?

22 A. I have no idea. That's a great -- I have no
23 idea. I'd be guessing.

24 Q. You, in your declaration, described much of
25 the praise you received from industry for the Dots.

1 What criticism did you receive from the
2 industry?

3 A. So I'm, like -- one, that was not the focus of
4 my declaration.

5 Two, I don't -- what we got was, like -- what
6 we got was, like, incredible acknowledgment and
7 recognition. I -- like -- and it was -- it was -- it
8 was on -- in every form. So I don't -- I'm not
9 accessing like criticism. It was almost the opposite.
10 It was pulled in so fast in terms of how quickly we were
11 able to grow the company, raise financing, grow the
12 customer base. It was like we unlocked something -- the
13 criticisms, I think for the most part, were focused on
14 the limits of these other paradigms. Like, hey, you
15 have application functionality, but it's very cumbersome
16 in software size. Hey, we love the mediacy of the web,
17 but it's very difficult for the document model. Hey, we
18 love the mobility of, like, phones and other things, but
19 it's almost impossible to use the web, and we have
20 almost no application functionality. That's what the
21 criticism was.

22 And the thing that I think was the most
23 exciting thing, and the thing that everyone saw and why
24 it was a big yes, was the way in which all those things
25 that people felt were insufficient in these other

1 paradigms, that our solution came along and released
2 that pressure and -- and unlocked that opportunity.

3 So the -- what I retained in this system and
4 what I focused on in the documents was the level of
5 enthusiasm. They're, like, yeah, thank God these things
6 are available.

7 Q. And, sir, I'm -- I understand how proud you
8 are of -- of your company, and I would be too.

9 But you can't recall any criticism that you
10 all received?

11 MR. IYER: Objection. Form. Asked and
12 answered.

13 THE WITNESS: I'm -- I'm sitting here
14 scanning, and, like, I'm optimistic, which is one of the
15 reasons why I think we were able to develop the company
16 we did. I'm also tend to the things that are working to
17 keep growing a business and tend to the products. I
18 don't -- I don't remember that. That was not a signal
19 that was present. It was almost the opposite. Like,
20 how can we keep up with the rate at which the market
21 opportunity was emerging and grow the organization?
22 The -- yeah. That's -- I mean, I don't -- I don't
23 have -- I don't remember anything specific like that
24 from a -- from the invention -- from the product
25 perspective. Like, the Dots and the Dot information

1 were unlocking and solving needs as opposed to -- yeah.
2 I think I -- that's what I -- I'll just say it again and
3 again.

4 BY MR. BALLANCO:

5 Q. Okay. One of the content providers you
6 mentioned in your declaration was Merriam Webster.

7 Do you recall that?

8 A. Absolutely.

9 Q. Okay. And do you recall the financial
10 relationship DoDots had with Merriam Webster?

11 A. I don't remember. I do remember flying out
12 and meeting with them and working with them and their
13 original Dots, but I don't remember the financial
14 arrangement.

15 Q. Do you know whether DoDots paid Merriam
16 Webster to use the Dots?

17 A. I -- I would be -- I don't remember. And
18 the -- yeah, I don't remember. That's such a strange
19 question.

20 Q. Well, would that have been a typical financial
21 arrangement between DoDots and one of its content
22 providers?

23 A. That's the strangest -- the customers were
24 paying us. I don't -- I don't -- and I don't remember
25 anything with the alternative was the case. So

1 you're...

2 Q. You mentioned in your declaration that the
3 ability for DoDots to secure financing during
4 the dot-com bubble was an enormous success.

5 Do you recall that?

6 A. Can you show me what you're pointing to?

7 Q. We can get there. But do you recall talking
8 about that in your declaration?

9 MR. IYER: Objection to form. Vague.

10 THE WITNESS: I -- in my declaration, I talked
11 about the investor response. If you want to point to a
12 specific statement I made, I'm happy to, like, explain
13 it in more detail.

14 BY MR. BALLANCO:

15 Q. Well, let me ask you this: Did you receive
16 any industry praise for how DoDots navigated the dot-com
17 bubble?

18 MR. IYER: Objection to form. Vague.

19 THE WITNESS: The industry praise was how our
20 product and offerings were unique and impactful and
21 successful, and I'm happy to walk through the industry
22 praise. But it's also in my declaration, if you want to
23 point to something specifically.

24 BY MR. BALLANCO:

25 Q. I'm just wondering if you received any

1 industry praise for how DoDots navigated the dot-com
2 bubble first.

3 MR. IYER: Same objection. Vague.

4 THE WITNESS: I -- like, if you want to point
5 me to -- I don't know what you're pointing at. So if
6 you want to point me to, like, something in my
7 declaration, my declaration was focused in, like, great
8 detail on the industry praise we received.

9 BY MR. BALLANCO:

10 Q. I'm not pointing at anything in your
11 declaration. I'm just wondering here in this deposition
12 if there was any industry praise that DoDots received
13 for how it navigated the dot-com bubble first?

14 A. The industry praise was focused on our unique
15 product offering and technology into the market, and
16 that's what I focused on in the declaration.

17 Q. Toward the end of DoDots' existence, there was
18 an entity named Orange UK who became involved with
19 DoDots, right?

20 A. There was -- the specific name I can point to
21 in the declaration. It was -- Orange is one of the --
22 the labels. I think Hutchinson Lampo was another one,
23 and we were in conversations with them at the end of --
24 of DoDots. They were interested in buying the company.

25 Q. And why did they decide to build their own

1 technology from scratch rather than acquire the DoDots
2 technology?

3 A. I don't -- I don't know. What I heard from
4 the CEO was it was his team's desire to just -- that
5 they -- the team felt more -- I'd be speculating. I
6 don't know. He just said that he was deeply
7 disappointed. This is the CEO. My contact is more on
8 the business side. He was deeply disappointed that
9 he -- that he was -- that his team rather -- would
10 rather -- I don't remember his specific language.

11 What he saw -- I'll tell you what -- what I --
12 what I remember, and that is: He -- what he felt was
13 what we had was what the market -- was right in the
14 center of the emerging intersection of the communication
15 media internet device. And he saw that buying us would
16 be a jump start into what is now known as the app and
17 app ecosystem. And he knew from the business side that
18 it would be a massive, like, leapfrogging an accelerator
19 into the markets. And his teams were just more
20 interested in the challenge of coding their own
21 software. They weren't looking at the -- and so the
22 thing that he wanted was to acquire the company for --
23 for its unique offerings and for the market advantage.

24 I can't speak to, like, what his engineers
25 said or what conversations he had to the engineers, but

1 he was deeply disappointed. And we can see now that he
 2 saw what was coming, and you can -- and like now, where
 3 companies and Apple and others who are dominating the
 4 app ecosystem market have effectively displaced the toco
 5 companies in that -- in that position. And it would be
 6 curious if -- if he was able to make that happen, what
 7 the landscape might look like now, but that would be
 8 speculating.

9 So I think the thing that he -- if you want to
 10 look at another example, here's now an industry leader
 11 in the mobile and content space who saw DoDots offering
 12 the Dots and the -- that entire set as a massive
 13 component to be -- to be a leader in the app and app
 14 ecosystem market as we know it now. And this is outside
 15 of Silicon Valley, outside the US. This is now global.
 16 And as another leading indicator that the
 17 telecommunication networks, the faster networks and the
 18 more -- next generation stuff was coming from Europe
 19 before the US. So the kind of, like, very clear steps
 20 from, like, Silicon Valley investment community have
 21 been evidencing this to customers to New York investors
 22 to now UK and toco providers. It was just one more
 23 example of the -- of what we had.

24 Q. Do you know whether his engineering team
 25 actually ended up developing a similar offering?

1 A. I did not track that.

2 Q. Sir, do you have any financial rights in the
3 DoDots patents today?

4 A. Zero.

5 Q. You understand that the current assignee of
6 the DoDots patents at issue in this proceeding is
7 engaged in a lawsuit against Samsung, right?

8 A. You said a word I didn't understand. Like
9 "assignee," or what did you say? Did I mishear you?

10 Q. You didn't mishear me. I'm slipping into
11 legalese.

12 The current owner of the DoDots patents has
13 sued Samsung for patent infringement.

14 You understand that?

15 A. That -- that makes sense to me. I understand
16 that.

17 Q. And do you stand to gain anything financially
18 should the current owner of the DoDots patents prevail
19 in that lawsuit?

20 A. No.

21 MR. BALLANCO: Sir, I have no more questions
22 for you today.

23 Pass the witness.

24 MR. IYER: I don't have any questions either.

25 MR. BALLANCO: Okay. We can go off the record

1 now.

2 THE STENOGRAPHER: Briefly before we go off,
3 counsel, would anyone like a transcript?

4 MR. BALLANCO: Please. I think you have our
5 order, our standing order. We'll just go with that.

6 THE STENOGRAPHER: I do.

7 MR. IYER: Yeah. And we'll just get regular.
8 We don't need expedited.

9 MS. CANINO: If we could do the same, that
10 would be great.

11 (Proceedings concluded at 10:17 a.m.)

12

13

14

15

16

17

18

19

20

21

22

23

24

25

THE SULLIVAN GROUP OF COURT REPORTERS

1	ERRATA SHEET		
2	NAME OF CASE: SAMSUNG ELECTRONICS CO., LTD. V. DODOTS		
3	LICENSING SOLUTIONS LLC		
4	DATE OF DEPOSITION: MAY 17, 2024		
5	NAME OF WITNESS: GEORGE KEMBEL		
6	Reason Codes:		
7	1:	To clarify the record.	
8	2:	To conform to the facts.	
9	3:	To correct transcription error.	
10	Page	Line	Reason
11	From		to
12	Page	Line	Reason
13	From		to
14	Page	Line	Reason
15	From		to
16	Page	Line	Reason
17	From		to
18	Page	Line	Reason
19	From		to
20	Page	Line	Reason
21	From		to
22	Page	Line	Reason
23	From		to
24	Page	Line	Reason
25	From		to
	GEORGE KEMBEL		DATED

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

DECLARATION UNDER PENALTY OF PERJURY

I, GEORGE KEMBEL, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on May 17, 2024; that I have made such corrections as appear noted on the Deposition Errata Page(s), attached hereto, signed by me; that my testimony as contained herein, as corrected, is true and correct.

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

GEORGE KEMBEL

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

STATE OF CALIFORNIA)
) ss.
)

**I, Kaitlyn B. Houston, CSR No. 14170, a
Certified Shorthand Reporter in the State of California,
duly empowered to administer oaths, do hereby certify:**

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

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

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

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

In witness whereof, I have hereunto subscribed my
name.

Dated: 20th of May, 2024.

Kaitlyn B. Houston

KAITLYN B. HOUSTON
CSR 14170

THE SULLIVAN GROUP OF COURT REPORTERS

-	access 14:6 17:11 51:1,20	alternatives 10:17 22:2	architecture 22:19
--o0o-- 5:2	accessing 57:9	alums 36:16	areas 18:10 20:1,14,18 30:23
1	accurate 7:8 18:7 31:18 32:8 33:7,19 50:17 54:6,7	amount 39:21 49:14	arrangement 59:14,21
17 5:1	acknowledgment 57:6	analyst 55:9	articles 43:14
1997 36:6	acquire 62:1,22	analyst's 43:15	articulated 31:7,8
2	acquisition 53:21	analysts 24:9	assignee 64:5,9
2000s 9:8,15	active 9:15 11:12	Andrew 5:19	assisted 49:1
2024 5:1	actual 27:21 47:21	angle 22:7 27:2	associate 47:1
25 35:12 54:2	addition 48:15	answers 8:14 33:21 42:5	associates 47:14
3	address 24:17	apologize 34:10	assumptions 38:11
30 35:12	addressed 30:12	app 11:10 62:16,17 63:4,13	attorney-client 42:7
8	addressing 27:23	Apple 6:8 63:3	attributes 41:1
8:34 5:1	advantage 62:23	application 11:19,20 14:11 15:12, 19 16:1,24 19:20 21:12, 14,16,23 22:1,12 25:8 26:12 29:13 57:15,20	audio 6:18
9	aesthetic 40:20	application-like 17:8	authored 35:24
90s 38:25	agree 19:24	applications 10:18 14:21 15:8	aware 9:9
A	ahead 32:2	appreciated 24:15 26:16	awareness 35:19 37:4,20,22 51:19
a.m. 5:1	air 22:9	appreciation 26:1	B
ABC 23:3	alignment 55:21	approached 19:8 55:15 56:1,2,5,11, 21	back 17:19 21:3 34:14 40:7
ability 17:9,12 60:3	allowed 19:12 25:13 35:22 37:11 45:5	apps 39:21	Ballanco 5:12,23 6:9 18:2 21:18 24:22 32:11,18 34:1 40:5,9,11,17 42:1,12 45:15 46:10,21 47:12, 23 51:9,22 52:7 53:23 55:13,23 59:4 60:14,24 61:9 64:21,25
Absolutely 59:8	alternative 11:4 15:10 19:19 22:19 25:3,10 26:2,3,17 29:3 59:25	arch 39:1	barely
accelerator 62:18			

Index: --o0o---barely

THE SULLIVAN GROUP OF COURT REPORTERS

34:20	8:1		channels 29:11,12,13
barriers 18:25	breakthrough 39:25	C	characterization 46:23
base 18:12 55:7 57:12	breath 22:9	call 14:1 18:9 19:25	Chase 53:6
based 40:24 49:19	bring 15:4 25:15 37:21	called 5:8 31:9	choice 52:17 55:18
bases 18:13,14 38:5 42:25	bringing 24:3	Canino 6:7	choose 23:20
beautiful 8:6 17:14 39:7	broad 33:20 39:1	capabilities 13:23 37:6	chose 55:19,24 56:3,16,17,18
beginning 18:3	brother 8:20 9:21	capacity 52:18 53:20	Chris 6:4
behalf 5:23 6:8	brought 21:14 25:11	capital 53:3,4,5,12,17	Christina 6:7
behavior 36:11	browser 13:7 15:13 29:20 34:3 35:7	case 26:9 32:14 33:12 56:7,8 59:25	claims 44:11 46:12 47:2
benefit 12:4 15:3	browsers 13:1 35:21 36:3	categories 17:22 30:3	classes 48:13,14,15
benefits 15:20 21:14	bubble 60:4,17 61:2,13	category 11:2,3,4 12:13 21:13 22:8	clear 63:19
biases 38:11	Bucket 18:8	caution 42:6	clearing 10:9
big 12:16 13:2 14:19 26:25 28:13 29:10 37:1 43:11 57:24	buckets 18:5,8	caveat 8:7	click 13:10,12 14:9
bins 43:11	build 16:11 51:16 61:25	CD 12:10	client 11:17 20:19 21:4,6,20 24:14,25
bit 30:9 43:2	building 51:17,19 53:20	CD-ROM 11:22	co-founder 9:18,19,20 52:9
blind 38:17	buildings 52:18	cellular 15:2	co-write 42:17
board 55:22	built 15:10 23:15 38:22	center 38:6 62:14	co-written 42:21
bones 34:18	business 10:4 20:2,10,13,15,23 23:19 35:2 36:17 37:13 38:7,8,23 43:1,20 44:7 48:13,22 49:9 58:17 62:8,17	CEO 9:16 10:1 52:9 62:4,7	coding 62:20
bought 11:24	buying 61:24 62:15	challenge 62:20	coffee 8:4
brand 29:18		challenges 12:3 22:2 27:21	collaborated 43:21
break 8:9 40:6		Chandran 6:5	colleagues 6:3
breaks		change 13:21 34:18 35:7	collection

Index: barriers-collection

THE SULLIVAN GROUP OF COURT REPORTERS

45:1 combination 42:19 comfortable 20:1 32:7,17 33:4,8,19 47:18 50:3,19 52:5 commerce 29:11 commercial 55:12 communicate 44:18 communication 62:14 community 23:8 44:22 48:18 49:6,8 55:3,4 63:20 companies 12:1 13:3,19 15:18 23:2,4,25 24:24 26:11 28:13 34:16 36:4 39:10 41:3,17 52:15 53:7 63:3,5 company 9:8,14,23 15:14 16:11 28:18 36:12,20 37:1 44:20 52:10 54:22 57:11 58:8,15 61:24 62:22 compartmentalized 24:5 competencies 38:6 competitors 10:7,13,23 complete 7:7 29:8 completely 22:6 component 41:7 63:13 components 41:24 computer 11:23 28:23	computing 14:16,25 15:4 35:18 concurrent 49:15 conference 43:15 conferences 24:9 39:10 confirm 7:14 confluence 38:14 confused 33:15 connect 45:13 46:12,16 connected 12:21 13:10 17:5 27:3,4 connection 15:1 44:24 45:6,10 46:17,24 47:7 connections 48:23 49:10 considered 53:15 54:23 55:1 constantly 16:8 constellation 27:2,3,5 constituents 31:2 constructed 46:8 consulting 36:13,14 consumed 35:7 consumer 37:15 consumers 12:24 19:22 contact 16:2 62:7 content	11:15 12:23 13:3,4 15:5,9,15,24,25 16:6, 13,25 17:12 19:20 22:16 28:12 30:20 50:4, 15,24 59:5,21 63:11 contention 30:11 continue 21:23,25 29:21 38:11 39:15 56:16 continued 39:13 continuing 12:7 33:8,20 contributed 41:22 44:19 conversation 31:14 conversations 61:23 62:25 counsel 5:3 32:24 42:15 43:8 47:17 court 5:5 6:17 7:3 cover 42:25 covered 43:19,20 crack 37:12 create 15:17,18,22 16:4 52:18 created 10:21 18:24 creating 11:1 28:7 43:17 46:6 53:15 creation 18:25 28:1 35:22 53:21 criticism 57:1,9,21 58:9 criticisms 57:13 CTO	10:1,2 cumbersome 12:11 14:11 15:9 16:9 57:15 curious 63:6 current 11:10 12:7,8,12 22:3,5, 15 25:8 64:5,12,18 customer 15:15,17 16:2,17 17:10 18:12,13 19:11 29:20 30:4 45:11 53:21 55:7 57:12 customers 12:2,5,24 18:23 22:11 26:6 28:15,21 39:10 41:13 43:4 44:23 46:7 51:17 52:14 53:7 59:23 63:21 cut 8:15 D Daignault 6:6 daily 12:18 data 12:8 14:20 15:1,21 16:25 17:8 22:2 25:5,7, 8,9 date 35:14 dates 39:2 days 52:16 53:1 deal 15:19 dealing 17:2 22:4 decide 61:25 decided 36:11
---	--	--	---

Index: combination-decided

THE SULLIVAN GROUP OF COURT REPORTERS

decision 36:22 52:19	15 38:1,5,10 40:13 43:12 48:15	dimensional 18:14	44:8 46:9 52:2 54:19 58:4
decisions 52:21	designing 19:9	dimensionality 20:24	Dodots 9:8,14 10:7,13 17:23 18:6 30:12 31:5,16 35:17 40:19 41:8 48:8 49:15,25 51:5,10,24 52:9 59:10,15,21 60:3, 16 61:1,12,19,24 62:1 63:11 64:3,6,12,18
declaration 9:10 26:9 28:14 31:10, 23 32:13 33:12 39:17, 20 42:3,16,18,21 43:22 44:3,5,10,15,17 46:20, 25 47:7,13,19,20,21 48:1,5 50:2,9,21,23 52:3 54:4,11,12,13,16, 21 55:6 56:24 57:4 59:6 60:2,8,10,22 61:7,11, 16,21	desirable 41:21	dimensions 38:2 40:23	
declarations 42:22	desire 62:4	direct 10:23 12:4 16:2 17:10 41:3	Dodots' 21:5 40:13 43:3 45:16 61:17
declined 55:14	desktop 11:19 29:17	disappointed 62:7,8 63:1	dollars 17:15 53:9
deeper 21:4	desktops 14:17	displaced 63:4	domains 16:9
deeply 53:15 62:6,8 63:1	detail 60:13 61:8	disrupt 38:11	dominating 63:3
defined 16:19 44:19	develop 29:24 58:15	disrupting 39:25	Dot 16:19 22:19 23:16 28:22 45:3,4 46:17 49:24 50:4 58:25
definitions 23:16 45:4	developed 46:19	distinct 36:22	dot-com 60:4,16 61:1,13
deliver 15:19,23 30:21	developer 29:23	distinguish 12:15	Dots 22:18 23:15 28:22 40:13,19 44:18 45:3 46:7,17 47:8 50:24 56:25 58:25 59:13,16 63:12
delivering 30:20	developers 11:25 13:3,19 24:7 28:17 30:13 49:24	distribute 25:7	double-click 30:16,23
demonstrate 50:13	developing 63:25	dive 30:9	downloading 22:3
demonstration 48:20	development 16:13 19:1 53:14,21	diverse 31:2	drew 51:1
deposed 6:11 8:20,24	device 14:23 16:4 20:21 29:21 62:15	divided 11:16 17:9,17 18:20 19:18	duly 5:8
deposition 6:25 7:11 9:3 31:10 61:11	devices 16:6 17:9 28:23 39:19	division 9:22,25 19:1	E
describe 19:25 30:1	devolve 29:25	divulge 42:6	early 9:8,15 48:8 52:15 53:1 55:3,11
describing 34:21 54:23	differentiate 10:25 11:2	document 14:19 29:18 31:11 33:2, 18,22,24 35:22 43:17 47:4 57:17	easier 6:21
design 35:23 36:7,10,17 37:11,	differently 19:5,6 37:20 45:2,3	document-browser 12:22	
	difficult 16:15 57:17	document-by-document 14:9	
	difficulty 12:7	documents 12:23 13:4,5 34:7 43:10	
	dig 21:3		

Index: decision-easier

THE SULLIVAN GROUP OF COURT REPORTERS

economic 53:1,12	engage 11:15 34:17	exact 50:6	45:5
ecosystem 11:10 62:17 63:4,14	engaged 64:7	EXAMINATION 5:12	extensive 51:2
ecosystems 17:16 18:11,19 39:22	engineering 38:7,8 63:24	examples 26:11 29:8 45:13 50:7	extent 9:2
edges 36:18	engineers 62:24,25	excited 13:16 48:22	F
effectively 63:4	engines 36:2	excitement 37:19	faced 27:22
effort 51:3	enormous 60:4	exciting 13:6 29:1 38:4 57:23	fact 36:22
efforting 25:20	entered 32:3	exist 21:15 27:19	factors 41:21
efforts 16:12 53:10	enthusiasm 37:5 58:5	existed 18:5 49:24	fair 6:22 7:24 10:6 20:21,22 30:15 40:21 45:18 56:14
elegant 16:21 17:5 19:15,18 25:11 29:2	entire 63:12	existence 61:17	familiar 11:9 13:1 23:8 34:12
elements 41:16 43:6	entity 61:18	existing 21:6 44:25	fast 38:24 45:9 57:10
elite 53:5	entrepreneur 23:19	expanded 11:4	faster 63:17
email 35:19 43:13	entrepreneurial 35:2	expanding 51:18	feedback 49:9
emerged 36:25 42:19	equivalent 10:20	expense 53:18	feel 13:21 22:21 27:17,22 32:17 33:4,8 34:18 35:3,6,16,18 36:17,21 39:6,24 50:3,18
emergence 35:21	Erise 6:8	expensive 16:14	feeling 34:22 35:24
emerging 12:21 13:2 20:20 23:9 35:20 36:1,11 38:14 58:21 62:14	estimate 39:16	experience 16:15,16 18:25 19:11 29:19,22 37:15 41:14	feels 20:22 33:16 41:10 49:18
end 30:23 61:17,23	estimating 31:19 39:16	experiences 41:3	felt 16:10 21:24 28:21 34:14,15,23 35:1 42:18, 22 46:20,22 54:20 57:25 62:5,12
end-users 30:14	etiquette 8:18	expert 44:14 46:8	file 11:22 22:2 25:5,7
endeavor 44:9	Europe 63:18	expertise 23:17	filed 9:7
endeavored 44:17	events 38:14	explain 60:12	finally 24:2
endeavoring 45:12	evidence 55:2	explained 42:15 43:8	
ended 63:25	evidencing 53:16 63:21	express 41:12 43:3	
	evolving 14:16	expressed	

Index: economic-finally

THE SULLIVAN GROUP OF COURT REPORTERS

finance 23:8 36:2 financial 13:9 30:17,19 52:2,22 53:2 59:9,13,20 64:2 financially 64:17 financials 51:13,20 52:24 54:4,5, 8,10,15 financing 48:25 57:11 60:3 finish 8:13,15 firm 6:2 firms 53:5 56:13 Fish 6:2 fit 42:22 flexibility 29:16 flow 17:15 flying 59:11 focus 50:2 51:15 52:13,22 53:7,11,13,18,19,25 55:10 57:3 focused 26:24 27:14 50:12 57:13 58:4 61:7,14,16 folks 21:22 24:14 food 36:15 form 13:4 17:24 21:7 24:19 31:25 32:15 35:9 40:14 41:9 44:13 46:4,14 47:4,16 51:6,12,25 52:11 54:25 55:16 57:8 58:11 60:9,18	format 15:7 formation 53:1 formats 41:15 forward 27:13 founder 9:16,17 frames 34:25 fresh 15:25 17:12 22:9 freshness 14:10 15:21 17:8 25:8 Friday 5:1 front 7:4 full 5:17 9:2 37:20 functionalities 19:21 37:5 functionality 10:18 12:2,4,6,11 14:12 16:1 17:8,11 21:15 22:1,11,12,16 25:13 26:14 28:12 29:13,17 57:15,20 fundamentally 11:16 funds 51:19 53:6	generalized 31:19 generalizing 32:25 generally 18:4 42:9 46:1 generation 63:18 George 5:7,16,19 6:6 gestures 6:18 give 7:3 8:7 11:7 21:9 29:8 35:12 54:6,7 56:14 giving 7:7 33:21 47:20 glance 29:2 global 63:15 God 58:5 good 5:13 8:4,17,18 40:6,8 goodness 22:10 graduate 36:19 39:3 graduated 36:7 grandkids 36:23 grandparents 36:23 great 12:4 18:17 20:11,17 22:1 24:12 43:11 49:8 56:22 61:7 ground 6:14 groups 30:13 grow 57:11 58:21	growing 36:6 37:4 58:17 growth 53:20 guess 50:14,18,20 54:9 guessing 32:8 33:4 47:19 50:3 52:4,5 54:3,18 56:23 Gunten 6:4 guys 36:25
H			
happen 23:13 37:1 63:6 happened 16:20 38:21 39:6 40:2 43:11 happening 37:5 happy 47:6 50:9,20 52:1,23 54:5,8 55:5,8 60:12,21 hard 11:8,18 13:25 39:22 48:2 Hart 6:8 Harvard 48:12 head 6:19 head-nodding 6:19 hear 10:10 20:25 31:13 32:20,25 40:23 heard 62:3 hearing 20:25 31:17 hearted 9:1			

Index: finance-hearted

THE SULLIVAN GROUP OF COURT REPORTERS

heavy 14:18,20	impactful 60:20	41:4,7	invent 36:12
held 25:14	implications 21:13 41:2	ingredients 41:4	invention 23:13 36:9 46:2,6 58:24
helped 38:2 41:2,8	important 12:15 40:12	initial 48:25	inventions 22:23 27:1 42:19
helpful 29:9 39:4	impossible 57:19	inquiry 19:8 37:12	inventory 29:6
hey 57:14,16,17	improve 21:5 25:1	inside 28:18	invest 23:20 43:16 52:17 55:14
high 12:11 17:11	included 54:3,14,15,19 55:6	install 11:23	invested 23:23
higher 17:19	including 35:23	installed 11:24	investing 23:10
highlight 27:8 33:2	incomplete 40:25	insufficient 57:25	investment 23:8 44:22 48:18 49:7 52:17,23 53:3,4,5,20 55:3,4 63:20
highly 52:15 53:16	incredible 19:19 34:16 51:18 57:6	integrative 16:15,16	investments 55:7
highly-functional 14:20	independent 28:19	intention 51:4	investor 48:8,9 55:25 56:2 60:11
holds 20:24	indicator 53:2 63:16	intentionally 8:15 37:12	investors 23:17 34:15 39:9 49:13 51:16 55:14,18 56:5,10, 15,20 63:21
hour 8:2 40:5	indicators 55:11	interactions 9:3	invoke 38:19
HR 53:5	individuals 13:3,19 24:24	interconnected 18:21 19:4	involved 61:18
Hutchinson 61:22	industry 10:8,14 50:12 56:25 57:2 60:16,19,21 61:1, 8,12,14 63:10	interest 50:17	IP 6:8
Hyun 6:4	inform 30:21,22	interested 31:16 61:24 62:20	IPR 5:24
I	information 10:19 12:12 13:7,9,12, 13,17,24 14:4,11 17:1 22:4,13,19 30:18 34:17 35:8 42:7 51:1,2 54:19 58:25	interesting 27:17 28:4	IPR2023-00621 6:1
idea 49:23 56:22,23	infrastructure 16:5	internet 12:16,19,20,25 25:12 35:6,19,20 36:24 62:15	IPR2023-00701 6:1
ideas 36:10	infringement 64:13	intersection 62:14	IPR2023-00756 6:1
identified 50:23	infused 12:17	introduce 5:21 48:17	issue 44:2,11 45:22 47:2 64:6
identify 31:15,23	ingredient	introductions 48:19 49:4,10,12	Iyer 6:5,6 17:24 21:7 24:19
imagine 34:20 39:23		intuition 37:10	
impacted 34:25			

Index: heavy-Iyer

THE SULLIVAN GROUP OF COURT REPORTERS

31:25 32:6,15 33:13 35:9 40:8,14 41:9 42:5 44:13 46:4,14 47:4,16 51:6,12,25 52:11 54:25 55:16 58:11 60:9,18 61:3 64:24	Koznick 43:13 48:7	38:8	low 15:1
J	L		M
Jin 6:4	labels 61:22	leapfrogging 62:18	macro 29:14 30:3 31:5,15
John 9:21,23 19:8 35:16 36:6,22 38:4 42:17 43:11,13,18,21 48:16 49:21	lack 25:25	legalese 64:11	made 36:22 40:19 41:15,16, 21 43:14 47:8 48:22,24 49:12 56:21 60:12
joined 6:3	Lampo 61:22	legitimate 25:22	magical 30:25
journals 35:23	landscape 14:17 23:9,18 63:7	lens 25:4	Majority 39:20
judge 7:4	language 12:15 26:1 27:19 62:10	level 12:6 17:19 31:6 32:12 58:4	make 6:21 12:23 17:19 41:8 46:17,23 48:18 51:5,11, 14 56:6,11 63:6
jump 62:16	laptop 28:23	library 13:14	makes 64:15
jumped 24:7	laptops 14:18	life 34:19 39:23	making 37:19 47:25 48:1 49:4 52:17
jury 7:4	large 11:21 14:9,10,20 15:7	lightweight 22:14	market 12:13 18:10 20:1,3,13, 18,21,22 21:4,6,19,20, 23 23:12,18,24 24:15, 17,25 25:1,17 34:3,4 35:3,7 39:11 40:20 43:4,6,20 44:8,9,21,22 45:8,11 46:12 47:1,9,14 48:14 49:8 53:16,20 54:21,24 55:9 58:20 61:15 62:13,23 63:4,14
	largest 49:14	limits 17:2 21:25 57:14	marketing 48:13 49:7
K	latencies 45:5	link 13:11,12	markets 17:15 24:7 25:2 26:23, 25 51:18 52:18 55:12 62:19
keeping 35:23	latent 23:12,16 27:15,16,23 30:12 31:1,5,15 37:7	list 56:12,14	massive 38:13 62:18 63:12
Kembel 5:7,19,20 6:6,10,24 8:19 17:18 40:12 47:17	law 6:2	live 17:13	massively 13:20 18:13,18 34:11
key 27:8	lawsuit 64:7,19	lives 12:18 24:3 37:22	masters 36:7
kind 19:10,11 20:24 22:14 26:14 27:1 28:5 29:4 36:6 37:3,12 38:19 43:3 63:19	lawyer 45:25	locked 17:17	matter
kinds 30:16 41:19 50:8	layers 12:19	logbooks 43:12	
knew 49:6,7,8 62:17	leader 63:10,13	long 11:25 27:16,19 49:3,18 51:1,14	
	leading 63:16	looked 19:13 40:25	
	lean 30:20	lost 16:1	
	leaned 38:7 42:25	lot 6:19 12:1 13:18,25 17:9 29:16 36:10 37:18,20 52:14	
	leans	love 20:22 57:16,18	

Index: Jin-matter

THE SULLIVAN GROUP OF COURT REPORTERS

38:23	mobile 14:23 15:4,13 16:6 17:2 20:21 25:17 26:13 63:11	52:20	12,25 52:11 54:25 55:16 58:11 60:9,18 61:3
meaning 7:23	mobility 57:18	needed 10:18,19 16:8 18:23 24:4 33:21 51:15	obvious 11:11 16:22 17:4 22:18, 23,24,25 25:18 29:1 39:8 45:9
media 11:21 15:23 19:20 29:12 62:15	model 14:9,19 15:8 29:18 57:17	Netscape 13:2 36:4	obviousness 21:24
mediacy 57:16	moment 23:14 26:6,13 39:6,9	network 12:20,25 15:2 25:12 35:20 55:21	offer 12:2 13:4 18:21,23 19:21 21:25 22:10,11 28:9 41:3,18 56:6,11
medical 7:6	money 23:5 51:15	networks 63:17	offered 22:8 44:21 47:15
meet 16:3	months 38:24	new-to-the-market 22:17	offering 12:1 15:14,23 17:1 23:20 24:18 26:16 28:7 39:8 47:8 51:17 53:10 61:15 63:11,25
meet all 29:24	morning 5:13,21 6:3	new-to-the-world 28:5	offering-centered 19:11
meeting 56:16 59:12	move 16:4,8 17:9,12,19 21:19 29:20 39:6	news 13:9 23:3 30:18 36:2	offerings 10:21,24 11:5,14 15:12 17:7,22 18:5 19:1 24:8 25:1 26:12,13 35:25 41:13,19 52:18 53:22 60:20 62:23
mention 8:11 48:9	movement 53:1	Nice 5:20	offers 56:3,18,21
mentioned 17:21 18:4 26:18 28:13, 14 34:2 41:17,21 44:6 48:7 50:21 56:3 59:6 60:2	movements 53:3,12,13	nodding 6:19	office 36:14
merging 12:14	movers 50:11	nonexistent 11:3	open 13:7 37:12 39:13
Merriam 23:3 59:6,10,15	multi-world 24:5	nonobviousness 19:4	opened 13:14 21:21 24:7
met 14:15 37:8 48:19	multiple 28:6,7,8 55:18,20 56:3, 15,18	normal 56:19	opening 21:13
Michael 5:23	my's 35:17	Now's 40:6	operating 15:11
micro 29:15 30:4		number 26:21,22 27:7 45:19 50:1,6 55:22	opportunities 28:7,11,17,21,24 30:2 37:13 38:15
middle 29:3		numbers 39:20	opportunity 27:25 28:1 53:16 58:2, 21
mine 48:11	named 61:18		
minutes 13:9 40:7	nature 19:4 22:14 23:14,15 37:13 46:18	O	
Mischaracterizes 46:15	navigate 52:19	oath 6:25 7:2	
mishear 64:9,10	navigated 60:16 61:1,13	object 47:21	
mitigate 22:1	navigating	objection 17:24 21:7 24:19 31:25 32:4,15,21,23 33:13 35:9 40:14 41:9 44:13 46:4,14 47:4,16 51:6,	

Index: meaning-opportunity

THE SULLIVAN GROUP OF COURT REPORTERS

opposed 24:5 28:2 29:19,22,25 31:19 59:1 opposite 57:9 58:19 optimistic 58:14 options 55:20 Orange 61:18,21 organization 49:20 51:16 58:21 organizational 16:14 organize 14:1,5 organized 14:8 organizer 14:5 organizing 17:1 orientation 16:21 orienting 44:6 original 59:13 oversimplify 19:2,23 owner 64:12,18 P packages 22:4 page-by-page 15:8 pages 13:5 35:24 36:1 paid 23:25 51:17 59:15 panelist	45:11 paradigm 12:22 20:19,23 37:8 paradigms 15:11 22:20,21 23:10 26:23 38:3 44:25 45:5 57:14 58:1 parallel 16:12 part 29:5 34:19 41:2,22 43:6,7,24 49:19 57:13 participation 23:6 parts 25:24 Pass 64:23 patent 44:11,14 45:16,25 46:8, 13 64:13 patents 9:7 44:1,4,11 45:18,20, 21,23 46:2 47:2 64:3,6, 12,18 path 16:23 pathway 23:13 pathways 19:19 Paul 6:8 pay 23:5 36:14 paying 53:7,8 59:24 peak 49:25 pending 8:8 pent-up 38:16 people 10:17 11:15 13:15,18, 19,25 18:22 19:21 24:1 28:22 34:25 35:7 37:18, 21 38:1 39:8 57:25 percentage 56:20 period 34:22 perspective 14:12,25 16:7,11 17:10 20:2,3,4,10,13,23 27:15 35:2 37:14,15,16 43:20 58:25 perspectives 55:5 pervasive 12:17 petitioners 5:24 philosophy 38:6 55:22 phone 28:24 phones 14:22 57:18 phonetic 43:13 physical 11:21 pick 29:21 38:2 pitched 56:13,15 place 11:13 14:2 places 10:19 14:3,7 plan 38:23 48:22 platform 49:15 platforms 29:25 playing 36:8	point 19:18 25:21 26:24 33:6 34:7 38:18 39:5 44:16, 24 45:13 60:11,23 61:4, 6,20 pointed 26:9 pointing 18:16 21:11 24:9 48:2 60:6 61:5,10 points 19:12 38:12 42:20 population 39:18 portals 14:2 16:3 portfolio 45:17 portions 46:2 position 63:5 potential 13:16 36:18 powerful 14:14,24 practice 38:1,10,19 practices 19:9 36:11 37:11 40:4 practicing 36:10 praise 56:25 60:16,19,22 61:1, 8,12,14 precise 27:7 31:18 32:9,10 35:13 precision 32:13 preparation 44:5 present 5:3 58:19 press
---	--	---

Index: opposed-press

THE SULLIVAN GROUP OF COURT REPORTERS

43:14,16 44:7 55:10 pressure 58:2 pretty 14:18 51:2 prevail 64:18 prevalent 11:10 prevents 7:7 primary 11:14 printouts 43:13 prior 18:5 35:16,17 privilege 42:8 problem 10:12 27:15,24 28:2 problems 24:16 25:4,5,7,21 26:5, 19,20,22,24 27:4 28:16 30:2 proceed 8:16 proceeding 9:5 45:22 47:2 64:6 proceedings 5:24 8:21 9:6,11 42:4 44:2,12 process 42:2,11,15,23 43:2,18 processor 11:19 product 11:2,3 12:13 15:15,16 17:22 18:5 20:4,5 21:13 22:8 23:19 24:17 29:21 46:18 47:14 51:17 58:24 60:20 61:15 productivity 30:17 products	11:14 15:5 18:11,17,23 19:20 28:9 36:12 53:11 58:17 professor 48:11 professors 36:17 profit 51:5,11,24 52:10,20 53:18,24,25 profitable 51:10 52:16 54:22 program 36:7 proportions 53:17 protected 42:7 proud 58:7 provide 17:7 51:13 54:10 provided 19:19 26:4 31:11 50:16 54:19 provider 17:7 28:15 30:19 providers 17:11 28:12 30:13,16, 18 31:3,6,16 41:12,17 50:4,15,24 59:5,22 63:22 providing 11:4 29:2 proxy 33:23 pull 27:12 43:9 54:4,7 pulled 39:11,22 45:8 57:10 purchased 23:4 pursue 56:16 put	22:25 33:23 42:2 48:4 52:2 putting 43:21 44:3 50:22 53:9 puzzle 25:24 Q question 6:21 7:12,22 8:8,9,13, 16 10:10,16 18:1 24:21 32:22,23 33:11,16 35:4 40:23 42:9,10,24 43:8 47:24 49:17 51:8 53:25 59:19 questioning 47:22 questions 6:17 7:19 32:9 33:1 42:16 48:6 64:21,24 quickly 23:4 57:10 R raise 57:11 raised 32:24 raising 51:15 range 19:19 rapid 24:1 rate 58:20 re-characterize 7:20 read 5:25 reality 20:7 realized 5:22	reason 7:6 56:17 reasons 10:21 58:15 recall 34:5,8 52:21 58:9 59:7, 9 60:5,7 receive 57:1 60:15 received 44:21,22,23 55:2,4,7,9 56:25 58:10 60:25 61:8, 12 recess 40:10 recognition 37:4 38:15 43:5 45:11 57:7 recognize 19:3 25:10 recognized 18:20 21:19 22:5 27:3, 4,6 39:9 47:9 reconfigure 17:5 reconfigured 16:20 reconfiguring 19:15 reconnected 18:22 22:20 26:5,6 reconnecting 19:21 record 5:15,22,25 32:22 64:25 reduce 25:6 redundant 16:12 reference 26:10 31:12,20 33:5 50:10 regular 38:1 relate
--	--	---	---

Index: pressure-relate

THE SULLIVAN GROUP OF COURT REPORTERS

9:7 44:9 46:2	review 44:1,4	seeking 20:6	silos 19:7
relationship 12:5 59:10	reviewing 44:7	selling 51:16	similar 49:2 52:21 63:25
released 58:1	rich 18:14	sense 34:20 64:15	simplify 11:8 18:15 27:12
releases 43:16 44:8	Richardson 6:2	separate 15:22 26:15	single 29:4 42:17
relevant 13:8,17 22:13 54:20,23 55:1	richness 19:3 22:10	service 15:15,16 29:22	singular 40:23
remember 11:8,18 34:13 35:14 36:24 49:4 58:18,23 59:11,13,17,18,24 62:10,12	rights 64:2	serviced 49:15	sir 5:15 9:5,13 42:2 47:24 58:7 64:2,21
remotely 5:4	rise 36:3	services 15:4 18:18,23 28:9 30:19	sitting 51:23 58:13
repeat 10:11 33:16	rising 35:15 38:14 39:1	set 8:20 13:23 28:10,16,20, 24 31:2 63:12	situation 20:8
rephrase 7:20	role 9:14 48:10	shift 29:1	size 11:22 16:25 22:2 25:5,7 57:16
reporter 5:5 6:17	round 48:25 55:19	shifts 26:25 37:9	slice 29:4
reports 43:15	rules 6:14	shopping 36:2	slipping 64:10
representative 20:7 29:7 50:16,21	run 15:7	show 37:9 48:3 54:12,13 60:6	small 14:24 25:24
represented 50:8		showed 48:20,21	smart 39:18
resolution 15:1	sake 6:17	side 10:4,5 16:16,17,24,25 17:2 20:16 22:16 25:17 28:15 43:1,18,25 44:7 49:9 62:8,17	smartphones 14:24
respond 6:18	Samsung 5:24 64:7,13	sideways 19:14 29:2	smoothly 6:15
response 6:18 18:3 60:11	sat 12:22 25:12 43:24	signal 58:18	Soft 53:5
responsibilities 9:22	scanning 58:14	significance 17:14	soft- 21:12
rest 46:20	scratch 62:1	significant 50:7,11 53:4	Softbank 55:20,24 56:4,18
resulted 48:24	screen 15:1	Silicon 36:16 63:15,20	software 11:17,23 12:7,10 14:21 15:11,12,18 16:5 20:19 21:4,6,14,17,20,23 22:4,12,16 24:14,25 26:12 57:16 62:21
retained 58:3	screens 14:19	siloed 38:13	softwares
revenue 53:9	search 36:2		
	secure 60:3		
	S		

Index: relationship-softwares

THE SULLIVAN GROUP OF COURT REPORTERS

22:3 sole 9:17 solution 17:5 18:22 19:18 21:5 22:18 24:16 25:11 26:18 31:1 58:1 solutions 11:5 12:1 16:18 25:22 26:24 27:5 28:5,8 37:23 39:21 41:18 50:8 solve 21:12 22:6 25:9,21 27:3,5,18 31:5 37:23 38:17 solved 26:4,18 27:22 31:16 45:1 47:10 solving 14:13 16:25 27:24 28:2, 6 59:1 sort 9:23 sorts 43:6,10 sound 8:17 34:12 sounded 42:20 sounds 8:4,18 20:17 40:8 sources 13:18 space 25:15,16,18 63:11 speak 8:23 62:24 speaks 47:4 specific 26:11 27:24 30:2 33:1,3 34:13 35:14 39:2,19 44:16 45:13 46:12 47:1 50:20 51:14 58:23 60:12 61:20 62:10 specifically	50:10 60:23 specifics 27:13 51:21 52:22 55:6 speculate 33:9,10 50:18 speculating 49:23 62:5 63:8 spent 23:5 33:2 spirit 42:18 spots 38:17 stage 53:14 55:3 stakeholder 28:10 30:13 stakeholders 28:8 30:5 38:16 41:22 stand 64:17 standing 29:5 Stanford 36:16 48:12 49:1 start 9:13 31:3 35:5,17 36:12 41:23 62:16 start-up 23:20 start-ups 36:1 started 12:23 13:15 24:3 34:24 35:3 43:17 44:20 starting 35:17,25 36:20 37:9 48:17 startups 48:14 49:7 state 5:14 29:10 statement 60:12	statements 48:1 stay 21:16 stayed 16:22 37:1 staying 22:3 steps 63:19 stipulate 5:3 stop 30:7 story 43:4,7,9,18,25 54:20 strange 18:8 59:18 strangest 59:23 strength 55:21 strike 24:13 structure 15:13 struggle 15:20,25 struggling 21:10 stuck 23:24 29:19 stuff 12:11 45:12 63:18 submitted 9:10 32:14 33:12 42:3 success 24:10 40:13,24 41:11, 23 45:11 50:13 53:2,13 54:24 55:12 60:4 successes 43:4 44:10 46:12 47:1, 9,14 successful 10:22 41:5,8 46:19	52:15 60:21 succinct 31:7,8 succinctly 31:9 33:2 39:2 sudden 13:6 17:6 19:13 sued 64:13 suggest 24:11 26:22 41:6 support 43:3 sworn 5:4,8 system 58:3 systems 15:11 T table 48:5 tablets 14:24 taking 29:2 talent 51:18 talk 12:16 20:9,12 26:10 29:14,15 39:1 44:15,17 46:5,6,9 47:6,11 50:9, 20 54:13 talked 23:7 27:11 43:23 55:8 60:10 talking 34:23 60:7 taught 36:17 48:11,12 team 51:17 53:10 62:5,9 63:24
--	--	--	--

Index: sole-team

THE SULLIVAN GROUP OF COURT REPORTERS

team's 62:4	things 10:4,5 11:5 12:21 14:15 17:6 19:3,15,24 21:22 22:15 24:4,11 25:23 28:25 33:3,6 34:2 37:16,19,21 38:3,12 39:3 40:22 43:3,16 44:8,16 47:8 48:4,6,24 54:14 57:18,24 58:5,16	30:21	typical 59:20
teams 16:13,14 62:19		top 12:22	
tech 23:9		total 50:1	U
technical 49:19		totally 12:14	UK 61:18 63:22
technique 19:12	thinking 10:15	touch 11:6 15:6	unable 46:23 52:9
technologies 11:14 19:20 36:9,12	thousand 15:9	track 64:1	unavailable 41:15
technology 10:5 18:12 20:3,4 23:6, 19 36:8 37:14 43:19 48:13,21 50:5 61:15 62:1,2	threw 26:21	trade-offs 12:6 13:24 14:15	unaware 12:24
telecommunication 63:17	thrilling 39:12	transcription 6:21	unconventional 42:20
telling 52:14 54:5,20	throat 10:9	trapped 17:16	underlying 25:12
ten 40:7	tide 35:15 36:6 38:14 39:1	tremendous 18:25	underneath 35:20
tend 58:16,17	time 6:14 10:20 11:25 27:16, 20 33:2 34:22,25 36:24 40:6 49:3,16 51:14 52:16 53:19	trillions 17:15	understand 6:24 7:2,18 9:5 17:25 21:10 24:21 30:11 35:4 40:16 45:16,19,24 46:1 48:3 51:7 53:24 58:7 64:5,8,14,15
term 18:9 19:24 20:1,6,13,15 34:10	timely 13:17 22:13	true 25:2	understanding 23:18 43:2
terms 20:8 43:4 49:4 53:11,17 57:10	times 6:10 15:9	truth 5:9,10	understood 7:23
testified 5:10	timing 39:7 52:19	truthful 7:7	undertake 44:2
testimony 7:3,8 46:15 52:8	toco 63:4,22	Tuesday 35:13	unexpected 23:11
tether 15:3	today 6:15 7:8 9:6 11:9 51:23 52:8 64:3,22	turn 53:25	unfair 18:15 46:20,22
text 8:25	today's 6:25	turned 51:24 52:10	unfamiliar 42:14
thing 8:11 12:9,16 13:5 19:16 22:15,22 23:21,22,23 28:4 30:22 37:25 38:22 39:14 52:25 53:6 57:22, 23 62:22 63:9	told 52:4	twin 9:21	unfolding 36:5
	Tom 48:7,18 49:5	twins 38:4	unique 23:11 41:25 60:20 61:14 62:23
	tool 33:23	two-thirds 39:18	University 36:16
	tools	type 15:25 35:22	unlock 25:15,16,18 27:2,25
		types 48:4	

Index: team's-unlock

THE SULLIVAN GROUP OF COURT REPORTERS

28:11 37:17 40:2 unlocked 19:16 23:12,16,24 24:12 26:14 28:17 29:3 31:1 45:4 57:12 58:2 unlocking 59:1 unlocks 30:3 unmet 27:24 unpack 30:8 uptick 24:1 user 16:10 18:25 user's 16:7 user-centered 19:10 users 16:3 24:2 30:23 34:16 49:15 utilized 50:4 V Vague 17:24 21:7 24:19 35:9 40:14 41:9 44:13 46:4 47:16 51:6,12,25 54:25 55:16 60:9,18 61:3 validating 23:21 Valley 36:16 63:15,20 vantage 25:21 38:12,18 venture 48:14 versioning 12:10 versus 10:4	view 19:13 20:24 24:15 42:20 visual 40:12,25 41:1,7,12 visually 41:13,14,25 von 6:4 W walk 33:5 48:5 52:24 55:5,8 60:21 wanted 14:7 15:16 19:22 37:2 62:22 wanting 23:12 37:7 watched 37:1 watching 37:4 wave 34:16 ways 25:6 28:3 29:10,14,15 34:19 38:11,19 40:1 web 12:14,19,21,22 13:2,5 15:24 20:20 25:14 26:12 29:18 34:3 35:6, 24,25 36:3 57:16,19 Webster 23:3 59:6,10,16 Wide 12:14 13:2 wildly 34:3,6 window 29:19 wonderful 18:19 22:22 wondering 60:25 61:11	word 11:19 20:22,23 34:6 64:8 words 34:13 46:11 47:13 work 12:8,12 30:21,22 36:9, 19 worked 45:17 48:21 working 24:14,25 25:23 35:19 58:16 59:12 world 11:13,17 12:14 13:2,15 15:10 17:13 18:17 20:24 21:15,16 26:15 38:15 world's 39:18 worlds 11:16 14:14 15:7,17 16:22,23 17:4,10,17 18:12 19:18 26:15 29:23 38:9 41:20 worth 37:10 writer 16:16 written 31:10 wrote 38:23 39:17 Y Yahoo 14:2 years 35:12,16 36:5,19,20 37:3 54:2 yes-or-no 6:20 yesterday 8:20,24 9:3 York 53:6 63:21	Z Zoom 6:3 8:12
--	--	---	---

Index: unlocked-Zoom