UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD,

Petitioner,

v.

DODOTS LICENSING SOLUTIONS LLC,

Patent Owner.

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

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

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

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VIDEOCONFERENCE DEPOSITION OF

GEORGE KEMBEL

MAY 17, 2024

Page 1 - 68 8:34 a.m. - 10:17 a.m.

REPORTED BY:
KAITLYN B. HOUSTON
CA CSR No. 14170
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Exhibit 1032
Samsung v. DoDots
IPR2023-00756

**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**

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**INDEX TO EXAMINATION**

**WITNESS: GEORGE KEMBEL**

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**QUESTIONS INSTRUCTED NOT TO ANSWER**

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**NONE**

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**EXHIBIT DESCRIPTION PAGE**

**NONE**

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

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

* * *

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

EXAMINATION BY MR. BALLANCO

Q. Good morning.

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

A. George.

You want full name?

Q. Please.

A. George Andrew Kembel.

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

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

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

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

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

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

BY MR. BALLANCO:

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

A. Is -- this will be the first.

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

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

Is that fair?

A. Yes.

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

A. Yes.
Q. And being under oath, you understand that the testimony you give is the same as if you were in court in front of a judge or a jury?
A. Yes.
Q. And is there any reason, medical or otherwise, that prevents you from giving complete, truthful, and accurate testimony today?
A. No.
Q. If that changes at all during the course of the deposition, just let me know. Okay?
A. Are you asking me a question?
Q. Yeah.
Would you confirm that if that changes, you'll let me know?
A. I will.
Q. Thank you.
If you ever don't understand one of my questions, will you let me know and then I'll try to rephrase it or re-characterize it?
A. Yes.
Q. Okay. If you answer a question, I'll -- I'll take that as meaning that you understood it.
Is that fair?
A. Yes.

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

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

Q. Right there with you.

A. Beautiful.

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

A. Okay.

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

Does that sound good?

A. Sounds like good etiquette.

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

A. Yes.

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

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

I just hearted it.
Q. Okay. And that was the full extent of your interactions following his deposition yesterday?
A. Yes.
Q. And, sir, you understand that the proceeding -- or proceedings, I should say, we're here about today relate to patents that were filed by your former company, DoDots, in the early 2000s, right?
A. I'm aware.
Q. And you submitted a declaration in those proceedings?
A. Yes.
Q. I'd like to start by asking you, sir, what was your -- what was your role in DoDots when the company was active in the early 2000s?
A. I was founder and CEO.
Q. You were a founder -- a sole founder? Co-founder with somebody else?
A. Co-founder.
Q. And who is the other co-founder?
A. My twin brother, John.
Q. And was there a division of responsibilities between you and John for the company in any sort of way?
A. Yes.
Q. And what was that division?

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

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

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

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

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

Can you please repeat it?

Q. No problem at all.

What competitors did DoDots have in the industry?

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

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

So I would say no direct competitors.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MR. IYER: Objection to form. Vague.

THE WITNESS: I'm not sure I understand your

question.
BY MR. BALLANCO:
Q. At the beginning of your last response, I believe you had mentioned that there were generally three buckets of prior product offerings that existed before DoDots came around.
Is that -- is that accurate?
A. "Bucket" is -- "three buckets" is a strange term. I'm not -- what I said, there -- you could call them three market areas. Three -- three areas in which the whole ecosystems of products were available. Three technology worlds. Three customer base -- not just three customer bases, massively different customer bases. These are so dimensional and rich. To try to simplify it like that is unfair, so I don't quite know what you're pointing at.
I would say the world had great products and services available through those three massively different ecosystems, which were wonderful. But because they were divided and no one recognized the interconnected -- that there was a way to offer a solution that reconnected people -- people who had products and services to offer and customers who needed them, and then in a -- in a new way, it created tremendous barriers to value creation, user experience,

development of new offerings because of that division.

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

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

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

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

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

A. From a business perspective, you can say "market." From a technology perspective, you would say "technology." From a product perspective, you would say "product."

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

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

A. Great.

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

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

A. That sounds great. Yeah.

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

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

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

Q. I'm trying.
A. Yeah.
Q. Let's go back, then, first and dig a little deeper into the client software market. Okay?
How did DoDots' solution improve upon the existing client software market?
MR. IYER: Objection to form. Vague.
You can answer.
THE WITNESS: Well, can you -- can you give me a more -- where I -- I'm struggling to understand what you're pointing -- because I don't think we were trying to solve an application soft- -- we were -- we were opening a new product category, which had implications, that brought the benefits of application software, like functionality, to a world that didn't exist. We weren't trying to, like, stay in the world of application software.
BY MR. BALLANCO:
Q. And had the market recognized a need to move away from the client software market to a new market that you opened up?
A. The -- I'll say two things: Those folks in the application software market were continue -- I don't think felt the obviousness of that. They were -- from the limits of it, they were trying to continue to offer

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

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

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

and they're like "There it is."

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

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

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

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

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

Q. And was -- strike that.

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

MR. IYER: Objection to form. Vague.

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

BY MR. BALLANCO:

Q. Sure.

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

improve their offerings in that market, right?

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

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

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

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

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

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

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

What were those problems?

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

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

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

Is that what you're asking?

Q. Yes, please.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Q. Okay.

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

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

Q. Let's start with providers.

A. Yeah.

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

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

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

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

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

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

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

A. I want to --

MR. IYER: Objection to form. Asked and

answered.

Go ahead. You can answer.

THE WITNESS: I think you entered an objection.

Say that again.

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

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

BY MR. BALLANCO:

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

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

THE WITNESS: I don't feel comfortable --

BY MR. BALLANCO:

Q. You can --

A. I didn't hear that.

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

A. I hear us generalizing, and you keep asking

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

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

So I don't feel comfortable continuing to speculate.

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

MR. IYER: Objection. Asked and answered.

But you can answer.

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

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

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

BY MR. BALLANCO:

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

Do you recall that?

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

I would say it was new.

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

Does that sound familiar?

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

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

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

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

Can you help me understand your question?

Q. Let's start with you.

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

MR. IYER: Objection. Form. Vague.

You can answer, though.

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

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

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

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

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

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

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

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

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

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

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

The thing that we had that I think not many

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

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

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

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

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

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

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

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

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

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

Let's come back in ten minutes, okay?

MR. IYER: Sounds good. Thanks.

MR. BALLANCO: All right.

(Recess taken.)

BY MR. BALLANCO:

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

MR. IYER: Objection to form. Vague.

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

BY MR. BALLANCO:

Q. Sure.

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

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

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

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

MR. IYER: Objection. Form. Vague.

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

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

But, yeah, it was visually unique.

BY MR. BALLANCO:

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

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

But you can generally answer that question.

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

BY MR. BALLANCO:

Q. Yes.

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

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

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

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

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

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

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

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

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

MR. IYER: Objection. Form. Vague.

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

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

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

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

BY MR. BALLANCO:

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

You had many patents; is that fair?

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

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

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

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

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

MR. IYER: Objection to form. Vague.

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

BY MR. BALLANCO:

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

MR. IYER: Objection to form. Mischaracterizes testimony.

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

BY MR. BALLANCO:

Q. I'm sorry. What felt unfair?

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

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

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

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

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

BY MR. BALLANCO:

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

MR. IYER: Objection to form. Vague.

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

BY MR. BALLANCO:

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

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

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

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

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

Q. Okay. What was his role?

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

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

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

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

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

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

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

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

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

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

Q. How many content providers utilized the Dot technology?

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

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

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

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

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

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

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

Q. What profit did DoDots make?

MR. IYER: Objection. Form. Vague.

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

BY MR. BALLANCO:

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

MR. IYER: Objection to form. Vague.

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

BY MR. BALLANCO:

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

MR. IYER: Objection to form. Vague.

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

///

BY MR. BALLANCO:

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

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

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

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

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

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

BY MR. BALLANCO:

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

no?

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

Q. Did you provide those financials with your declaration?

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

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

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

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

MR. IYER: Objection to form. Vague.

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

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

BY MR. BALLANCO:

Q. Which investors declined to invest that you approached?

MR. IYER: Objection to form. Vague.

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

BY MR. BALLANCO:

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

approached?

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

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

A. That's always the case.

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

A. Yes.

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

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

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

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

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

What criticism did you receive from the industry?

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

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

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

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

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

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

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

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

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

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

BY MR. BALLANCO:

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

Do you recall that?

A. Absolutely.

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

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

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

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

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

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

you're...

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

Do you recall that?

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

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

MR. IYER: Objection to form. Vague.

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

BY MR. BALLANCO:

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

MR. IYER: Objection to form. Vague.

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

BY MR. BALLANCO:

Q. I'm just wondering if you received any

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

MR. IYER: Same objection. Vague.

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

BY MR. BALLANCO:

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

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

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

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

Q. And why did they decide to build their own

technology from scratch rather than acquire the DoDots technology?

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

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

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

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

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

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

A. I did not track that.
Q. Sir, do you have any financial rights in the DoDots patents today?
A. Zero.
Q. You understand that the current assignee of the DoDots patents at issue in this proceeding is engaged in a lawsuit against Samsung, right?
A. You said a word I didn't understand. Like "assignee," or what did you say? Did I mishear you?
Q. You didn't mishear me. I'm slipping into legalese.
The current owner of the DoDots patents has sued Samsung for patent infringement.
You understand that?
A. That -- that makes sense to me. I understand that.
Q. And do you stand to gain anything financially should the current owner of the DoDots patents prevail in that lawsuit?
A. No.
MR. BALLANCO: Sir, I have no more questions for you today.
Pass the witness.
MR. IYER: I don't have any questions either.
MR. BALLANCO: Okay. We can go off the record

now.

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

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

THE STENOGRAPHER: I do.

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

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

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

**ERRATA SHEET**

**NAME OF CASE: SAMSUNG ELECTRONICS CO., LTD. V. DODOTS LICENSING SOLUTIONS LLC**
**DATE OF DEPOSITION: MAY 17, 2024**
**NAME OF WITNESS: GEORGE KEMBEL**

**Reason Codes:**

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

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**GEORGE KEMBEL DATED**

**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**

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

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