Transcript of David Crane, Volume 2

Date: February 29, 2024
Case: Sony Interactive Entertainment LLC -v- Quantum Imaging LLC (PTAB)

Planet Depos
Phone: 888.433.3767
Email: transcripts@planetdepos.com
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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3 SONY INTERACTIVE ENTERTAINMENT LLC,)
4 Petitioner,)
5 vs.)
6 QUANTUM IMAGING LLC,)
7 Patent Owner.)
8 ---
9
10
11 Case No. IPR2023-00954
Patent No. 8,458,028
12 Case No. IPR2023-00959
Patent No. 10,255,724
13 Case No. IPR2023-00995
Patent No. 10,846,941
14 Case No. IPR2023-00996
Patent No. 10,991,165
15
16 VOL II VIDEOTAPED DEPOSITION OF DAVID CRANE
17 via videoteleconference
18 Thursday, February 29, 2024
19
20
21 REPORTED BY: Derek L. Hoagland
22 CSR No. 13445
23
24
25

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2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3 SONY INTERACTIVE ENTERTAINMENT LLC,)
4 Petitioner,)
5 vs.)
6 QUANTUM IMAGING LLC,)
7 Patent Owner.)
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9 Case No. IPR2023-00954
Patent No. 8,458,028
10 Case No. IPR2023-00959
Patent No. 10,255,724
11 Case No. IPR2023-00995
Patent No. 10,846,941
12 Case No. IPR2023-00996
Patent No. 10,991,165
13
14 VOL II VIDEOTAPED Deposition of DAVID CRANE, taken
15 before Derek L. Hoagland, a Certified Shorthand Reporter
16 for the State of California, commencing at 10:59 a.m.,
17 Thursday, February 29, 2024, via videoteleconference.
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1 APPEARANCES:
2 (ALL COUNSEL APPEARING VIA VIDEOTELECONFERENCE)
3 COUNSEL FOR PETITIONER
DUANE MORRIS LLP
4 260 Homer Avenue
Suite 202
5 Palo Alto, California 94301
BY: PHILLIP W. WOO, ESQ.
6 pwwoo@duanemorris.com
-- and --
7 BY: MONTÉ SQUIRE, ESQ.
mtsquire@duanemorris.com
8
9 COUNSEL FOR PATENT OWNER
DUNLAP CODDING
10 609 W. Sheridan Avenue
Oklahoma City, Oklahoma 73102
11 BY: DOUG SOROCCO, ESQ.
405.607.8600
12 dsorocco@dunlapcodding.com
-- AND --
13 BY: MARC BROCKHAUS, ESQ.
mbrockhaus@dunlapcodding.com
14 -- AND --
BY: ANN ROBL, ESQ.
15 arobl@dunlapcodding.com
16
ALSO PRESENT
17 DYLAN KEISLER, VIDEOGRAPHER
JOSEPH LORETE, TECHNICIAN
18 PATRICK DUNN WITH QUANTUM IMAGING
HOMAYOON RAFATIJO WITH QUANTUM IMAGING
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1 I N D E X
2 WITNESS PAGE
3 DAVID CRANE
4 EXAMINATION BY MR. SOROCCO 294, 430
5 EXAMINATION BY MR. WOO 399
6
7 E X H I B I T S
8 EXHIBIT DESCRIPTION MARKED
9 No. 2011 Crane condensed transcript Vol I 304
10
11 R E F E R E N C E D E X H I B I T S
12 EXHIBIT DESCRIPTION REFERENCED
13 No. 1004 '028 Crane Declaration 295
14 IPR 954
15 No. 1008 Robinson 324
IPR 954
16 No. 1004 '941 Crane Declaration 367
17 IPR 995
18 No. 1007 Pisanich 380
IPR 995
19 No. 1001 ''941 patent 381
20 IPR 995
21 No. 1004 '165 Crane Declaration 411
IPR 165
22
23
24
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1 10:59 a.m. P R O C E E D I N G S
2
3 THE VIDEOGRAPHER: Here begins Media No. 1 in
4 the continued videotaped deposition of David Crane in
5 the matter of Sony Interactive Entertainment LLC v.
6 Quantum Imaging LLC in the United States Patent and
7 Trademark Office before the Patent Trial and Appeal
8 Board, Case Nos. IPR 2023-000954 and 00959 and 00995 and
9 00996.
10 Today's date is February 29th, 2024. The time
11 on the video monitor is 10:59 a.m. Pacific Standard
12 Time. The videographer today is Dylan Keisler,
13 representing Planet Depos, and all parties at this
14 videotaped deposition are attending remotely.
15 Would counsel please voice identify themselves
16 and state whom they represent.
17 MR. SOROCCO: Yes. This is Doug Sorocco for
18 patent owner. With me are Ann Robl and Marc Brockhaus.
19 The three of us are with Dunlap Codding, PC. Also with
20 us for patent owner is Homayoon Rafatijo with the Law
21 Firm of Spencer Fane.
22 MR. WOO: This is Phillip Woo with the Law Firm
23 of Duane Morris on behalf of the petitioner, Sony
24 Interactive Entertainment. I'll be defending the
25 witness today.

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1 THE VIDEOGRAPHER: Okay. And the court reporter
2 today is Derek Hoagland, also representing Planet Depos,
3 and the witness will now be sworn.
4 (Whereupon, the deponent is duly sworn by the
5 court reporter.)
6 MR. SOROCCO: Thank you.
7 It's nice to see you again, Mr. Crane.
8 One minor thing on the videographer's read-in.
9 I believe there's an extra zero in 2023-000954. I
10 believe it's 2023-00954.
11
12 DAVID CRANE,
13 having first been duly sworn,
14 was examined and testified as follows:
15
16 EXAMINATION
17 BY MR. SOROCCO:
18 Q. Okay. Mr. Crane, when we left off on Monday, we
19 were talking about what we had designated as the '028
20 patent, which is formerly known as the 8,458,028 patent.
21 Do you recall our discussions, Mr. Crane?
22 **A. Not specifically.**
23 Q. Do you remember that we were discussing this
24 patent, Mr. Crane?
25 **A. Yes.**

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1 Q. Okay. And this is the patent that Petitioner
2 has filed Case Number IPR 2023-00954. Do you recall
3 that information, Mr. Crane?
4 **A. I will have to take your word for that. I don't**
5 **have any documents in front of me.**
6 MR. SOROCCO: Okay. If we could go to -- if we
7 could bring up Exhibit 1004 in the 954 proceeding -- IPR
8 proceeding, I would appreciate it, Joe.
9 THE TECHNICIAN: Sure thing. Stand by.
10 (Referencing Exhibit 1004 IPR 954.)
11 THE TECHNICIAN: Okay. The document has been
12 uploaded into the chat.
13 MR. SOROCCO: Okay. Mr. Crane, if it would be
14 more helpful to download or bring it up on your computer
15 to make it easier to see, please feel free to do so.
16 Joe, could you scroll down to about the middle
17 of the screen? There you go. You can stop right there.
18 BY MR. SOROCCO:
19 Q. Mr. Crane, do you recognize this document?
20 **A. It looks correct.**
21 Q. Okay.
22 MR. WOO: Wait, wait. Actually, I'd just like,
23 as a matter of process, David, are you able to actually
24 pull up the whole document if you need to or?
25 THE DEPONENT: I clicked on the download, so I

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1 presume that if I exited Zoom, I would find it in my
2 Downloads folder, which then would mean I would need to
3 open it in preview.
4 So the question is can I? Probably. Have I?
5 Not at this point. Let me see what I have to do.
6 MR. WOO: And I just say that because if you
7 need to look at more portions of the document that are
8 being -- other than what's actually being displayed to
9 you on the Zoom proceeding, you're welcome to do that.
10 THE DEPONENT: Well, let's see. Right now I'm
11 not able to even hide Zoom. There it is.
12 Let's see what I have here. It appears to be in
13 my download folder, and I am able to open it in preview.
14 And let's see if I can return to Zoom.
15 I did not do that correctly.
16 MR. SOROCCO: Well, Mr. Woo, let's -- I'm happy
17 to show as much of the document via Zoom screen as
18 Mr. Crane needs, if it would be easier for him than
19 opening up the PDF locally?
20 MR. WOO: Well, my preference is that Mr. Crane
21 actually have a document he can look through as he
22 needs, so rather than simply seeing what's on your
23 screen, he can look at portions of the document for
24 complete context if you're going to ask him questions
25 about the document.

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1 So, David, let us know if you're able to open up
2 the document, access it, and see it yourself.
3 THE DEPONENT: I do have it. I can put it on a
4 separate screen. The issue is primarily that I'm
5 navigating back and forth. It was not all that
6 seamless.
7 All right. I appear to have it on both screens.
8 MR. WOO: Okay. Thank you, David.
9 BY MR. SOROCCO:
10 Q. Okay. Exhibit 1004 from the 954 IPR case,
11 Mr. Crane, is your declaration that you -- that the
12 petitioner filed in this case. Is that correct?
13 **A. It looks like it.**
14 Q. Okay. Great. And I will admit to you that it
15 is the same document that we were chatting about on
16 Monday.
17 MR. SOROCCO: If we could zoom -- or scroll down
18 to page 47, Joe. Fantastic.
19 And if you could scroll down to what's labeled
20 as Romanette iv. I believe this might be the 954.
21 Yeah. Page 40 -- page 47, I'm sorry. It's page 47 on
22 the PDF document itself. There you go. Romanette -- I
23 just need to make a notation that the number of pages is
24 off versus the numbered pages within the PDF, given the
25 table of contents and the front page.

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1 BY MR. SOROCCO:
2 Q. Mr. Crane, at Romanette iv, which represents
3 element 1[c] of claim 1 of the '028 patent, there is the
4 language there that you have bolded, "Automatically
5 integrating business-related content.
6 Do you see that language, sir?
7 THE REPORTER: I'm sorry. I'm sorry. I'm
8 sorry. "Do see that language, sir?" And then the
9 answer.
10 Mr. Crane, could you please repeat the answer?
11 THE DEPONENT: I believe I said, yes, I see it.
12 BY MR. SOROCCO:
13 Q. And Mr. Crane, as you may recall, we discussed
14 antecedent basis in patent claims on Monday. Is that
15 correct, sir?
16 **A. I believe we discussed it on Monday.**
17 Q. Okay. And what is your -- do you have a
18 recollection of our discussion on Monday?
19 **A. Not specifically.**
20 Q. Okay. Do you have an understanding of
21 antecedent basis in patent law?
22 **A. I have a general understanding.**
23 Q. Okay. And can you tell me your general
24 understanding of antecedent basis in patent law?
25 **A. I understand it to mean that within a claim, if**

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1 **a claim term is described using the word "the" rather**
2 **than "a," it is referring back to an earlier reference**
3 **to that same claim term in that claim.**
4 Q. Okay. And is it your understanding that in
5 addition to "the," sometimes claims will use the word
6 "said" to refer back to a prior indication of that claim
7 term?
8 **A. That wouldn't surprise me.**
9 Q. Okay. So looking at Romanette iv, element 1[c],
10 automatically integrating business-related content, is
11 that the first indication of business-related content in
12 claim 1?
13 MR. WOO: I advise the witness to look at the
14 document as much as you need in order to form your
15 answer.
16 MR. SOROCCO: Mr. Woo, I didn't object on Monday
17 to those comments to the -- to Mr. Crane. However, I
18 believe, pursuant to the guidelines -- I can pull it up
19 real quick -- the -- let's see. Yeah, the -- the
20 Appendix D testimony guidelines that it's -- it's
21 improper to be telling the witness to look at the
22 document before you answer. I certainly want Mr. Crane
23 to take as much time as he needs, but I will object to
24 your reminding him of that from time to time.
25 MR. WOO: For the record, I'm just advising him

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1 to look at it. You're putting something up on the
2 screen and you're asking, is that the first appearance
3 of that term in the claim. If you're asking him to look
4 at the screen alone, he's not going to be able to answer
5 that question. So it's a little bit unfair to say is
6 that the first appearance without giving him proper
7 context.
8 MR. SOROCCO: Understood, in this context.
9 However, on Monday, we did have the documents in front
10 of us.
11 MR. WOO: He doesn't have the document in front
12 of him now. At least it's on the screen. So it's a
13 different situation.
14 BY MR. SOROCCO:
15 Q. Given that -- Mr. Crane, given that it says
16 "automatically integrating business-related content" and
17 there's not the word "the" or "said" in front of it,
18 would it be your understanding, sir, that that would be
19 the first indication or recitation of business-related
20 content in claim 1?
21 MR. WOO: Objection. Calls for a legal
22 conclusion.
23 THE DEPONENT: I wouldn't consider it -- the
24 lack of a term like "the" to indicate that it's the
25 first.

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1 MR. SOROCCO: Okay. Let's go up to -- let's go
2 to page -- in the PDF, page 44, Joe. And it's
3 Romanette i. If you could stop right there.
4 Mr. Crane, if you could look at Romanette i and
5 tell me whether or not the term "business-related
6 content" is recited in Romanette i.
7 THE DEPONENT: The term "business-related
8 content" shows up twice in that claim element, the
9 preamble.
10 MR. SOROCCO: Okay. In the preamble.
11 Let's go to page 45, Romanette ii.
12 BY MR. SOROCCO:
13 Q. Does the term "business-related content show up
14 in Romanette 2, Mr. Crane?
15 **A. I do not see the term "business-related content**
16 **in this claim.**
17 Q. Okay.
18 MR. SOROCCO: Could we go to page 47, at the
19 top, Romanette iii. Up a little higher. There you go.
20 BY MR. SOROCCO:
21 Q. In Romanette iii, do you see the language
22 business-related content, Mr. Crane?
23 **A. It's not on the screen there.**
24 Q. Okay. Let's scroll back down to Romanette iv.
25 Other than the preamble of the claim, is the

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1 term "business-related content" -- strike.
2 Is the term "business-related content" in
3 Romanette -- Romanette ii, iii -- ii and iii, Mr. Crane.
4 **A. I believe that's just what we went through**
5 **there.**
6 Q. Okay. So other than the preamble, this is --
7 Romanette iv is the first recitation of the term
8 "business-related content." Is that correct?
9 **A. Other than the preamble, I believe that's**
10 **correct.**
11 Q. Okay. Let's look at page one twenty -- or
12 excuse me, paragraph 125 on page 51.
13 Okay. And actually, I am going to draw your
14 attention to what's been labeled section B right there
15 between paragraphs 125 and 126. And for claim 3, the --
16 it -- you have bolded claim 3:
17 "The method of claim 1 wherein said game
18 application displays branded business-related content to
19 said users."
20 Do you see that language, Mr. Crane?
21 **A. I do.**
22 Q. Okay. And would it be your opinion that branded
23 business-related content is the same as business-related
24 content that we saw on Romanette iv on page 47?
25 **A. That really depends on context. Branded**

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1 **business-related content should be branded.**
2 Q. Okay. Is the term brandes -- "branded
3 business-related content," the -- excuse me, the phrase,
4 identical to "business-related content"?
5 **A. The two phrases are not identical.**
6 Q. Okay. And on paragraph 127.
7 MR. SOROCCO: If you could scroll down a bit,
8 Joe.
9 BY MR. SOROCCO:
10 Q. You wrote:
11 "Additionally, and as noted above, Angles
12 disclosed displaying advertisements to a user."
13 Do you see that language?
14 **A. Yes.**
15 Q. Okay. "And advertisements are a form of branded
16 content."
17 Do you see that statement?
18 **A. I do.**
19 Q. And then it goes on:
20 "Advertisements are also business-related
21 content intended to promote a company's business."
22 Do you see that language?
23 **A. I do.**
24 Q. Is it your opinion, Mr. Crane, in paragraph 127,
25 that advertisements are both a form of branded content

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1 and business-related content?
2 **A. In my experience with advertisements, they are**
3 **overwhelmingly both.**
4 Q. Okay. And I believe on Monday, you stated that
5 you considered the terms "branded business-related
6 content" and "advertisements" to be synonyms.
7 Do you recall that testimony, sir?
8 **A. I don't recall that specific testimony.**
9 MR. SOROCCO: Okay. Let's look at -- I'm
10 actually going to pull up what I'm going to label as
11 Exhibit 2011, and this is going to be the condensed
12 transcripts of your testimony on Monday, Mr. Crane.
13 If you can make that document available to
14 everyone, Joe.
15 THE TECHNICIAN: Stand by.
16 (Exhibit No. 2011 marked for identification.)
17 MR. SOROCCO: And this is the unofficial
18 transcript that we've gotten in the interim days.
19 THE TECHNICIAN: It's been uploaded into the
20 chat.
21 MR. SOROCCO: Okay. Can you open the document
22 so we can look at it on the screen together?
23 Okay. And this is what's -- a mini version. So
24 we're putting four pages of transcript and testimony on
25 every actual page.

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1 So can you go down to page 64 of the document,
2 Joe?
3 Okay. Right -- yeah, scroll up. I'm sorry.
4 It's going to be, actually, page -- actual page 249. So
5 if you scroll up a little bit. There you go. And if
6 you could put that testimony just a little bit down a
7 little further. There we go.
8 BY MR. SOROCCO:
9 Q. If you look at, on the upper left-hand side,
10 Mr. Crane, starting in -- at line 8, I asked you the
11 question about paragraph 127 of Exhibit 1004, that you
12 made the comment advertisements are a form of branded
13 content.
14 Do you see that question -- or I guess I should
15 say, comment?
16 A. I see the quote from my declaration from
17 paragraph 27. Is that what you're asking about right
18 now?
19 Q. No. I'm just asking you to look on the screen,
20 the Zoom screen, at line 8. This is a transcript of our
21 discussion on Monday. I believe it was probably
22 mid-afternoon or early evening. And at line 8, I stated
23 "okay" with response to your prior answer, and then I
24 went on and I stated:
25 "So in paragraph 127, you make the comment,"

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1 quote, "advertisements are a form of branded content,
2 end quote."
3 Do you see that statement that I made?
4 A. I do.
5 Q. Okay. And that's referring to the quote coming
6 from paragraph 127. Is that correct?
7 A. It appears to be.
8 Q. Okay. And I went on, and I asked you to tell me
9 what is the basis for your statement.
10 Do you see that at line 10?
11 A. I do.
12 Q. Okay. And then your answer was:
13 "The entire field of advergaming, which was a
14 decade before this -- this patent application, the
15 persons of ordinary skill in the art that I've worked
16 with in the area of branded advergaming, it would be
17 considered synonymous."
18 So does that refresh your recollection,
19 Mr. Crane, that you mentioned that branded
20 business-related content and advertisements are
21 synonymous?
22 A. I'm looking at this. I assume it's an accurate
23 transcript of what I said.
24 Q. Okay. I'm just asking you, does it refresh your
25 recollection?

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1 A. That there was a discussion about whether they
2 were synonymous?
3 Q. Yes?
4 A. Yes, I see there was a discussion that they were
5 considered synonymous.
6 Q. Okay. That was your opinion, sir, was it not?
7 A. General opinion, yes.
8 Q. Okay. What do you mean, general opinion?
9 A. I mean, that generally, branded -- let me
10 rephrase that.
11 An advertisement is generally branded
12 business-related content.
13 Q. Okay. You also talked -- you -- do you also
14 recall that you testified that advertisement is also a
15 form of business-related content?
16 A. I'm not surprised if I would have said that.
17 Q. Okay. And is it still your opinion today that
18 business-related content and branded business-related
19 content would be synonymous with advertisements?
20 MR. WOO: Objection to the -- objection. Form.
21 THE DEPONENT: It's still my opinion today that
22 as a generalization, advertisement is a form of
23 business-related content.
24 MR. SOROCCO: Okay. Thank you.
25 Let's go on to right -- back to Exhibit 1004,

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1 Joe.
2 THE TECHNICIAN: Stand by.
3 MR. SOROCCO: Okay. If you could go to -- there
4 is a section C right above paragraph 130.
5 BY MR. SOROCCO:
6 Q. Okay. Do you see section C there at the mid --
7 at the top of the Zoom screen, Mr. Crane?
8 A. I do.
9 Q. Okay. And it states, in bold type:
10 "Claim 4: The method of claim 3 wherein
11 said" -- whoop.
12 MR. SOROCCO: Joe, we lost the text on the
13 screen.
14 THE TECHNICIAN: I do apologize for that. My
15 Zoom decided to glitch a little bit.
16 MR. SOROCCO: No problem. It happens all the
17 time.
18 BY MR. SOROCCO:
19 Q. So I believe I was reading out loud the
20 language -- the bolded language of claim 4. So claim 4:
21 "The method of claim 3 wherein said branded
22 business-related content is dynamically updated."
23 Do you see that language for claim 4, Mr. Crane?
24 A. I do.
25 Q. Okay. And do you see the term "said" in front

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1 of "branded business-related content," Mr. Crane?
2 **A. I do.**
3 Q. And per our previous discussion about antecedent
4 basis in patent law, does the term "said" indicate
5 anything to you?
6 **A. In reading that, I would assume it refers to the**
7 **branded business-related content that is referred to in**
8 **claim 3.**
9 Q. Thank you. And given that claim 4 states that
10 the branded business-related content is dynamically
11 updated, is it -- would it be fair to say that that is
12 the branded business-related content that is introduced
13 in claim 3 that is dynamically updated?
14 MR. WOO: Objection. Calls for a legal
15 conclusion.
16 THE DEPONENT: I would assume that to be the
17 case.
18 BY MR. SOROCCO:
19 Q. Okay. And why would you assume that to be the
20 case?
21 **A. If I can rephrase that. That's how I would read**
22 **the claim as a non-attorney.**
23 Q. Okay. Thank you.
24 I want to ask -- I want to ask a hypothetical of
25 you, Mr. Crane.

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1 If an advertisement showed a, let's say, Tesla
2 Model Y, would that constitute, in your opinion, a
3 business-related content?
4 MR. WOO: Objection. Form.
5 THE DEPONENT: If an advertisement was promoting
6 the sale of a product, I would consider it to be
7 business-related content because they're trying to
8 induce business.
9 BY MR. SOROCCO:
10 Q. Okay. I think you recharacterized my question a
11 bit, so hang on one second.
12 I wanted to ask -- so if an advertisement had a
13 Tesla Model Y on a billboard, would that billboard
14 constitute business-related content?
15 MR. WOO: Objection. Form.
16 THE DEPONENT: I think that would depend on the
17 advertisement. But my previous answer is the best way I
18 can characterize how I would interpret that.
19 BY MR. SOROCCO:
20 Q. Okay. So assume a game, then, that you are
21 playing on your computer shows a billboard with a Tesla
22 Model Y on it. Would you say that the game was
23 displaying branded -- or excuse me, business-related
24 content?
25 MR. WOO: Objection. Form.

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1 THE DEPONENT: Could you repeat that question.
2 BY MR. SOROCCO:
3 Q. Yeah, sure. Suppose a game that you were
4 playing on your PC showed a billboard with a Tesla
5 Model Y on it. Would it be your opinion that that
6 advertisement in the game displayed business-related
7 content?
8 MR. WOO: Objection. Form.
9 THE DEPONENT: No. The question has the same
10 caveat I'm talking about, is I'd have to see it. And if
11 I saw this hypothetical of yours and it appeared to be
12 promoting business, like attempting to sell a car or
13 interest the player in buying a car, then that would be
14 business-related content as -- as I see it on the
15 billboard.
16 BY MR. SOROCCO:
17 Q. Okay. Do you have an understanding of what the
18 term "dynamically updated" means?
19 **A. I do.**
20 Q. Can you please provide me with your opinion or
21 understanding?
22 **A. Dynamically is the opposite of statically, which**
23 **means statically means it doesn't change. Content that**
24 **is dynamically updated means it changes from the first**
25 **one you see to something else.**

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1 Q. Is there a timing component to your
2 understanding of dynamically updated?
3 **A. Timing in that it's different at some point?**
4 Q. That was a question for you, sir. Is -- would
5 timing be a component of your definition of dynamically
6 updated?
7 **A. I don't think there's any specific timing**
8 **inferred. But as I said, it changes.**
9 Q. Okay.
10 **A. And so if it's one -- if it's one thing at one**
11 **time and another thing at another time, it was dynamic.**
12 Q. Okay. And going back to our hypothetical of a
13 Tesla Model Y, if the advertisement changed as you were
14 looking at it from a black Tesla Model Y to a pink Tesla
15 Model Y, would that, in your opinion, be dynamically
16 updated?
17 MR. WOO: Objection. Form.
18 THE DEPONENT: Probably.
19 BY MR. SOROCCO:
20 Q. Okay. Why probably?
21 **A. I would want to see it in context, but**
22 **otherwise, if it's dynamic, it's dynamic.**
23 MR. SOROCCO: Okay. Can you -- Joe, can you
24 scroll down a bit to the block quote under
25 paragraph 131? There we go. A little bit higher.

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Exhibit 2010
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1 There we go.
2 Actually, let's scroll up. Oh, right stay
3 there.
4 BY MR. SOROCCO:
5 Q. Do you see the language in paragraph 131 where
6 you wrote:
7 "Angles teaches the limitation of this claim"?
8 MR. SOROCCO: And actually, Joe, why don't you
9 scroll up so section C of -- there can be seen. There
10 you go. Stop right there.
11 BY MR. SOROCCO:
12 Q. So you state in paragraph 131:
13 "Angles teaches the limitation of this claim."
14 And I assume that you're referring to claim 4,
15 since paragraph 131 sits there under.
16 Is that fair, Mr. Crane?
17 A. Referring directly to claim 4, but of course
18 that includes claim 3, since it's a dependent claim
19 of 3.
20 Q. Sure. But when you say Angles teaches the
21 limitations of this claim, is it fair to assume that you
22 were referring to claim 4?
23 A. Generally, yes.
24 Q. Again, why generally?
25 A. I would refer back to claim 3 to confirm what

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1 the branded related content that claim 3 was referring
2 to, since we're referring to claim -- said branded
3 business-related content.
4 Q. All right.
5 A. But my statement is generally about the
6 dynamically updated advertisement.
7 Q. Okay. That's what I was getting at.
8 So you state that -- you go on, excuse me, in
9 paragraph 131 to state that:
10 "Angles teaches that when an advertisement
11 (branded business-related content) is displayed to the
12 user for a period of time, said advertisement is
13 dynamically updated."
14 Do you see that language, Mr. Crane?
15 A. I do.
16 Q. Okay. And is the fact that the phrase "branded
17 business-related content" in paren, end paren,
18 "advertisement," is it fair to say that you are defining
19 branded business-related content as an advertisement?
20 MR. WOO: Objection. Form.
21 THE DEPONENT: In the context of Angles, Angles
22 was teaching advertisement, which generally is branded
23 business-related content, as I have said.
24 MR. SOROCCO: Okay.
25 THE DEPONENT: So when I put that claim term in

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1 bold, I am referring to the claim term in claim 4, and
2 in my opinion, Angles teaches that the advertisements
3 discussed above were dynamically updated.
4 BY MR. SOROCCO:
5 Q. Okay. And let me simplify, since Mr. Woo made
6 an objection to my prior question, is: The fact that
7 you have "branded business-related content" bolded and
8 following "advertisement," is there a connection that
9 you're drawing between that word -- the word
10 "advertisement" and the phrase "branded business-related
11 content"?
12 A. I have drawn a connection between advertisement
13 and branded business-related content in this analysis.
14 Q. Okay. And that connection is what?
15 A. Is that a person of ordinary skill in the art at
16 the time of the application of the asserted patent would
17 have understood an advertisement to generally mean
18 branded -- or the term "branded business-related
19 content" included advertisement.
20 Q. Okay. And then you go on in that sentence to
21 state:
22 "Is displayed to the user for a period of time,
23 said advertisement is dynamically updated."
24 Do you see that language?
25 A. I do.

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1 Q. And I note you used the word "said" in front of
2 "advertisement," and it appears that some patent
3 language has found its way into your -- your opinions
4 there, sir.
5 But my question is, I had asked you if your
6 definition or understanding of dynamically updated had a
7 time component to it. Do you recall that question?
8 A. Well, first let me address this comment that you
9 made that patent language worked its way into my
10 analysis.
11 When I use the term "said," I use that as
12 shorthand for that thing I was just talking about. I
13 don't want to write that thing I was just talking about,
14 so I might use the word "said." And if we scroll down
15 and look at the block quote, that's what I'm referring
16 to, because I included it as a reference.
17 Q. Okay. Then you -- but let me go back to my
18 question related to dynamically updating having a time
19 component to it.
20 Does your opinion not say, sir, that:
21 "An advertisement is displayed to the user for a
22 period of time, said advertisement is dynamically
23 updated"?
24 MR. WOO: Objection. Form. Document speaks for
25 itself.

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1 THE DEPONENT: You just read my statement, and I
2 stand by that statement.
3 BY MR. SOROCCO:
4 Q. Okay. The question I'm trying to get to is that
5 I asked you whether or not, in your opinion, a
6 dynamically updated included a time component. And I
7 believe your testimony was that it may or it could, that
8 it was not unqualified.
9 And so my -- what I'm asking you is, in your
10 opinion in paragraph 131, did you state that dynamically
11 updated included a time component?
12 MR. WOO: Objection. Form.
13 THE DEPONENT: My statement in 131 is a
14 statement of what Angles teaches, and I supported that
15 with a block quote that is below 131 and not showing on
16 the screen.
17 BY MR. SOROCCO:
18 Q. Okay. Let's scroll down to that block quote,
19 then. And the block quote from Angles, right, is that:
20 "If the consumer continues to view the
21 electronic page 32, the advertising module 62 continues
22 to update the customized advertisements, 30."
23 Do you see that language, Mr. Crane?
24 **A. I do.**
25 Q. So if the consumer continues to view --

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1 continues to view, does that imply a time component?
2 **A. No specific time is talked about, but certainly**
3 **time is passing as you're viewing a page.**
4 Q. Okay. Thank you.
5 Then there is a -- oh. Well, if we go down a
6 little further:
7 "For example, if a consumer views a particular
8 electronic page 32 for more than a minute," and you've
9 bolded "more than a minute" -- "the advertising module
10 52 can send a new customized advertisement."
11 Do you see that language, sir?
12 **A. I do.**
13 Q. Okay. So is the send a new customized
14 advertisement, is it your opinion that that is the
15 content being updated?
16 **A. Sending a new customized advertisement is**
17 **dynamically updated content, yes.**
18 Q. Okay. A hypothetical is that if a game shows
19 you an iPhone ad and a minute later shows a Samsung
20 phone, is that, accord -- well, would that be, according
21 to your testimony, branded business-related content that
22 was dynamically updated?
23 MR. WOO: Objection. Form.
24 THE DEPONENT: As I said, the business-related
25 content, I would have to see it to decide whether or not

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1 it was attempting to perform business. Most
2 advertisements are. And if they change dynamically,
3 then it is dynamically or dynamically updated
4 business-related content.
5 BY MR. SOROCCO:
6 Q. Okay. So let me -- let me break my question
7 down, then.
8 Have you ever seen, Mr. Crane, an iPhone ad that
9 showed a picture of the iPhone with Apple listed on
10 thereunder?
11 MR. WOO: Objection. Form.
12 THE DEPONENT: I have seen iPhone ads on
13 billboards. And the second part of your question was
14 with Apple indicated under it? Is that what your
15 question was?
16 BY MR. SOROCCO:
17 Q. Well, let me ask. I'll break it further.
18 Have you ever seen an advertisement, it may be
19 on a billboard, it may be on a screen of an iPhone?
20 **A. I have seen iPhones advertised.**
21 Q. Okay. Have you ever seen an iPhone advertised
22 with the name of the company listed on the
23 advertisement?
24 **A. I have certainly seen iPhone ads with Apple's**
25 **logo. I don't recall if that logo included the company**

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1 **name.**
2 Q. Okay. Would the logo be something that you
3 considered to be branded, a brand?
4 MR. WOO: Objection to form.
5 BY MR. SOROCCO:
6 Q. Okay. Mr. Crane, would the Apple logo be an
7 item that you consider to be part of Apple's brand?
8 MR. WOO: Objection. Form.
9 THE DEPONENT: I would consider the Apple logo
10 to be part of Apple's brand.
11 BY MR. SOROCCO:
12 Q. Okay. And if we go for the same question is,
13 if -- have you seen an advertisement for a Samsung
14 phone?
15 **A. Probably.**
16 Q. Have you seen an advertisement for a Samsung
17 phone that has Samsung brand information on it?
18 **A. Probably.**
19 Q. Okay. And then I will get to my ultimate
20 question, is that if a game shows the iPhone ad with the
21 Apple logo on it and a minute later shows a Samsung ad
22 with a Samsung brand information on it, according to
23 your testimony, would that be a dynamically updated
24 content?
25 MR. WOO: Objection. Form.

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1 THE DEPONENT: There's another issue. I don't
2 know if we've discussed it or not. But if you are
3 updating an ad, you are replacing an ad. So is -- does
4 your question refer to replacing the iPhone ad with a
5 Samsung ad?
6 MR. SOROCCO: I'm just saying that in -- at the
7 beginning of your minute at -- it shows -- the
8 advertisement shows an iPhone ad, and a minute later, 60
9 seconds later, the advertisement shows a Samsung ad.
10 Was the change from the iPhone ad to the Samsung ad a
11 dynamically updated content?
12 MR. WOO: Objection. Asked and answered. Form.
13 MR. SOROCCO: Counsel, he asked me the question
14 and I broke it down for him.
15 THE DEPONENT: If the advertisement for the
16 iPhone is on a billboard, for example, and that
17 billboard image changes to an advertisement for the
18 Samsung, then the advertisement was dynamically updated.
19 BY MR. SOROCCO:
20 Q. Okay. Thank you.
21 And I'm going to go back. We have talked about
22 it.
23 Have you ever seen an ad for a Tesla automobile?
24 **A. Probably.**
25 Q. Okay. Have you ever seen an advertisement for a

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1 Tesla -- a black Tesla automobile?
2 **A. I don't recall having ever seen a black Tesla**
3 **automobile advertised.**
4 Q. How about a white Tesla automobile advertised?
5 **A. I have seen white Teslas advertised.**
6 Q. Okay. And if the ad for a white Tesla changed
7 to an advertisement to -- for a pink Tesla a minute
8 later, would you say that the branded business-related
9 content, i.e., the Tesla automobile, was dynamically
10 updated?
11 MR. WOO: Objection to form.
12 THE DEPONENT: Could you repeat or rephrase that
13 question without that i.e. or be more specific what that
14 i.e. meant?
15 BY MR. SOROCCO:
16 Q. I would be happy to.
17 So again, all I'm asking is, if you see an
18 advertisement for a black Tesla on a billboard and a
19 minute later, as you're looking at the billboard, the
20 Tesla advertisement changes color to pink, would you say
21 that the advertisement was dynamically updated?
22 **A. Yes.**
23 MR. WOO: Objection. Form.
24 THE DEPONENT: Yes, I would.
25 ///

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1 BY MR. SOROCCO:
2 Q. Okay. All right. We're going to move on from
3 Angles to -- I believe you have a second -- let me find
4 it real quick -- a second grounds for your belief that
5 the '028 patent was unpatentable, to a reference of --
6 called Robinson. Yes. Okay.
7 MR. SOROCCO: So Joe, if you would go to page 68
8 of the PDF document itself.
9 Okay. If you scroll up there a little bit.
10 "Section D, ground 2: Claims 1, 3-9 are obvious over US
11 Patent No. 7,168,051 to Robinson, et al., paren, quote,
12 "Robinson," quote, paren, "in view of the knowledge of a
13 POSITA."
14 Do you see that language?
15 **A. I do.**
16 Q. And is it your opinion that Robinson discloses
17 all of the elements of those claims in the '028 patent?
18 MR. WOO: Objection. Form. Document speaks for
19 itself.
20 THE DEPONENT: You know, I did document my
21 opinion here, and my recollection is I would answer that
22 question, yes, I believe it disclosed or at least taught
23 or rendered obvious all of the claims of the asserted
24 patent.
25 ///

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1 BY MR. SOROCCO:
2 Q. Okay. I would --
3 **A. I'm sorry. All of the challenged claims.**
4 Q. Okay. I was going to clari for you.
5 MR. SOROCCO: Can we, Joe, can you pull up what
6 is Exhibit 1008 in the 954 IPR?
7 THE TECHNICIAN: Stand by.
8 (Referencing Exhibit 1008 IPR 954.)
9 THE TECHNICIAN: Okay. The document has been
10 uploaded into the chat.
11 MR. SOROCCO: Okay.
12 BY MR. SOROCCO:
13 Q. Do you recognize this document, Mr. Crane?
14 MR. WOO: And, again, Counsel, before Mr. Crane
15 answers, I want to give him the opportunity, as
16 appropriate, to retrieve the document for himself so he
17 has it and he's not relying simply upon what's being
18 displayed on the screen during the deposition.
19 MR. SOROCCO: That's fair, I believe.
20 Take your time, look through the document, and
21 let me know.
22 THE DEPONENT: Well, this isn't a memory test.
23 I haven't memorized every line of Robinson. I'm going
24 to take your word that this is a true and complete copy
25 of the Robinson reference.

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1 MR. SOROCCO: Okay. And let's go back now to
2 your documents.
3 Exhibit 1004, Joe. And go to paragraph 177.
4 BY MR. SOROCCO:
5 Q. What is the -- in -- excuse me.
6 In paragraph 177, Mr. Crane, the last sentence,
7 you state that -- oh, let me just talk about the entire
8 paragraph. So strike the prior.
9 In paragraph 177, you're referring to the
10 preamble, Romanette No. i of claim 1, and the language
11 of Romanette i is:
12 "A method of integrating business-related
13 content over a computerized network into a primary
14 electronic device that accesses a game application from
15 at least one secondary electronic device that accesses
16 business-related content on a plurality of webpages the
17 method comprising."
18 Do you see that language, sir?
19 **A. I'm not on that same page on mine, and it**
20 **scrolled off the top, but I'm going to presume that you**
21 **read it correctly.**
22 Q. Okay.
23 MR. SOROCCO: If you want to scroll up a bit,
24 Joe. I'm sorry. You followed me. But --
25 ///

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1 BY MR. SOROCCO:
2 Q. Okay. How does that --
3 **A. Like I said, I'm going to assume you read it**
4 **correctly.**
5 Q. Okay. In your paragraph 177, you state that:
6 "Robinson discloses a client computer, a primary
7 electronic device."
8 And you refer back to paragraph 89, when you
9 were generally speaking about Robinson. And then you go
10 on:
11 "And a server of webpages containing
12 business-related content."
13 What do you mean -- or do you have an
14 understanding of the term "server of webpages"?
15 **A. Well, a server is a computer that is accessible**
16 **through a network and provides data. Webpages are a**
17 **very common use of servers. And so if a server is**
18 **serving content to the web, that would be a server that**
19 **serves webpages.**
20 Q. Okay. And a little farther down, you say:
21 "Robinson also teaches an e-commerce server."
22 Do you see that language, sir?
23 **A. Yes. I was about to scroll off the bottom.**
24 MR. SOROCCO: Oh. If you could scroll down,
25 Joe. I'm sorry. You can stop there. That would be

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1 great.
2 And do you have an understanding of what the
3 term "e-commerce server system" means?
4 **A. I do.**
5 Q. What is that understanding?
6 **A. The "e" stands for electronic and the "commerce"**
7 **stands for doing business.**
8 Q. Okay. What would you -- do you have an
9 understanding of server system?
10 **A. The server system, yes. It's a server computer,**
11 **typically.**
12 Q. Okay. Is there any -- what is the -- does the
13 term "system" add any additional definition to that
14 phrase?
15 **A. Yeah, it very much can.**
16 Q. Okay. And with respect to this specific
17 language here in paragraph 177, how does it add
18 information to that phrase?
19 **A. Well, what it adds to that phrase is not**
20 **specific to just this paragraph.**
21 Q. Right.
22 **A. If you hear about an electronic server system,**
23 **that server system can include, you know, databases,**
24 **external servers, connections to libraries. There's a**
25 **number of things it can be. And you would still call it**

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1 **a server system.**
2 Q. Okay. And you -- you -- the claim includes the
3 language "at least one secondary electronic device."
4 Do you see that, sir?
5 MR. SOROCCO: If you can scroll up, Joe. There
6 you go.
7 THE DEPONENT: "At least one secondary
8 electronic device."
9 Yes.
10 BY MR. SOROCCO:
11 Q. Okay. And between the e-commerce server system
12 and the server of webpages that you discuss in
13 paragraph 177, which one of these items do you consider
14 the secondary device within the meaning of the preamble
15 of claim 1?
16 MR. WOO: Objection. Form.
17 MR. SOROCCO: Let me ask it a different way.
18 BY MR. SOROCCO:
19 Q. Do you have an understanding or a belief as to
20 the term "secondary electronic device"?
21 **A. I would consider that to be an electronic device**
22 **that is separate from the primary electronic device.**
23 Q. Okay. Within the claim term, is the e-commerce
24 server system that you discuss in paragraph 177 the
25 secondary electronic device?

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1 MR. WOO: Objection. Form.
2 THE DEPONENT: I refer to my paragraph 90, which
3 is talking about Figure 3 of Robinson, and it specifies
4 a server object 330 that contains everything needed to
5 serve up webpages and applications. So without
6 reviewing it in detail, I believe I was probably
7 referring to the user -- or the server -- I'm sorry, the
8 server object 330 as the secondary electronic device
9 disclosed by Robinson.
10 MR. SOROCCO: Okay. If you could scroll down a
11 little bit, Joe, so we can see the entirety of 177.
12 BY MR. SOROCCO:
13 Q. You state that Robinson, in the second sentence,
14 discloses a client computer, a primary electronic
15 device. Is the fact that the language "a primary
16 electronic device" defining in some manner -- or strike.
17 Did you intend the language "a primary
18 electronic device" to refer to client computer?
19 **A. The bolded primary electronic device is the**
20 **language directly in front of the claim element above,**
21 **and in my analysis, I looked at the claim language "a**
22 **primary electronic device" and reviewed Robinson to**
23 **determine if Robinson teaches a primary electronic**
24 **device.**
25 Q. Okay.

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1 **A. And that -- that's what this statement says.**
2 Q. Okay. And if we go on, you state that:
3 "And a server of webpages containing
4 business-related content." And then again it states,
5 "At least one secondary electronic device," paren, end
6 paren.
7 Do you see that language?
8 **A. I do.**
9 Q. Did you intend the bolded language, at least one
10 secondary device, to reference webpages -- or excuse me,
11 a server of webpages containing business-related
12 content?
13 MR. WOO: Objection. Form.
14 THE DEPONENT: Similar to the previous answer,
15 what I -- the reason I put that bolded text in there is
16 because that's the claim element. It is what I am
17 searching for when I'm analyzing Robinson. And I
18 referred to my description in paragraph 90 about a
19 server capable of serving webpages and/or applications.
20 And since that's different than the primary electronic
21 device, I said that Robinson discloses a secondary
22 electronic device.
23 BY MR. SOROCCO:
24 Q. Okay. Is it your opinion, then, that a server
25 of webpages, as disclosed in Robinson, teaches at least

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1 one secondary electronic device as that term or phrase
2 is used in the preamble of claim 1?
3 **A. That is the opinion I set forth here, and I**
4 **believe that.**
5 Q. Okay. Thank you.
6 The next sentence goes on to say:
7 "Robinson also teaches an e-commerce server."
8 And, again, you have the language:
9 "At least one secondary electronic device," and
10 then you add "that accesses business-related content."
11 Do you see that language, Mr. Crane?
12 **A. I do.**
13 Q. Okay. Is it your opinion, then, that an
14 e-commerce server as disclosed in Robinson teaches at
15 least one secondary electronic device that accesses
16 business-related content as used in the preamble of
17 claim 1?
18 MR. WOO: Objection to form.
19 THE DEPONENT: That paraphrases my opinion that
20 I stated here, yes.
21 BY MR. SOROCCO:
22 Q. Okay. Why do you -- is the bolded language
23 different with respect to server of webpages as opposed
24 to an e-commerce server? And what I mean by different
25 is a server of webpages, you then tie it to at least one

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1 secondary electronic device, but an e-commerce server
2 was tied to the language, at least one secondary
3 electronic device that accesses business-related
4 content.
5 **A. I don't recall any reason for that difference.**
6 Q. Okay. On --
7 MR. SOROCCO: If we could go to paragraph 91.
8 BY MR. SOROCCO:
9 Q. Do you see the language in paragraph 91, that
10 you wrote:
11 "Also shown in Figure 3 of Robinson is an,"
12 quote, "e-commerce system 360"?
13 **A. I do.**
14 Q. Okay. In -- so Robinson discloses an e-commerce
15 system 360. Is that correct?
16 **A. It does.**
17 MR. SOROCCO: Okay. Let's go back to
18 paragraph 177. I'm sorry to make Joe go back and forth
19 through so many pages here.
20 BY MR. SOROCCO:
21 Q. Okay. Do you see that last sentence, "Robinson
22 also teaches an e-commerce server," Mr. Crane?
23 **A. I do.**
24 Q. Okay. In paragraph 91, you quoted Robinson as
25 disclosing an e-commerce system 360, yet in

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1 paragraph 177 you state that Robinson also teaches an
2 e-commerce server, referring back to paragraph 91.
3 Is an e-commerce server and an e-commerce system
4 the same device?
5 **A. Typically, an e-commerce system back then was**
6 **executed by a server. Offhand, I don't know that I**
7 **would say they were absolutely identical, but certainly**
8 **an e-commerce system would be considered by a person of**
9 **ordinary skill in the art to use a server.**
10 Q. Okay. And you said the word -- let me get this
11 here so I have it, the language.
12 You said:
13 "Typically, an e-commerce system back then was
14 executed by a server."
15 Would an e-commerce system back then, which I
16 assume you mean prior or at the time that Robinson was
17 filed, would it have to be executed by a server?
18 MR. WOO: Objection. Form. Mischaracterizes
19 the testimony.
20 MR. SOROCCO: Okay. Let's scroll up in the
21 language, then.
22 BY MR. SOROCCO:
23 Q. You stated in your answer:
24 "Typically, an e-commerce system back then was
25 executed by a server."

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1 Are you aware or have any knowledge of
2 e-commerce systems that were not executed by a server?
3 **A. As I sit here today, I am not aware of any**
4 **e-commerce systems that did not use a server.**
5 Q. Okay. Is it fair to say that simply because you
6 were not aware of them that they did not exist?
7 **A. It is certainly possible that things that I am**
8 **not aware of exist.**
9 Q. Okay. I'm just curious, if we go back -- scroll
10 down to 177, why you chose to call to Robin -- what
11 Robinson teaches in 177 an e-commerce server, referring
12 back to paragraph 91, where the Robinson is actually
13 teaching an e-commerce system.
14 **A. No reason. They're all involving electronic**
15 **devices.**
16 Q. Okay. Does that mean that the language is
17 not -- should not be considered to be precise in your
18 declaration, Mr. Crane?
19 MR. WOO: Objection. Form.
20 THE DEPONENT: I don't know that that's a fair
21 characterization. I always do my best to be precise.
22 BY MR. SOROCCO:
23 Q. Okay. And I think we talked about, on Monday,
24 that, you know, giving credit to your colleagues,
25 programmers, that you would only take credit for things

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1 that were 95 percent or more, in your opinion, I think,
2 programmed or designed by you. Is that a fair
3 characterization?
4 MR. WOO: Objection. Form.
5 THE DEPONENT: In referring to game products
6 that I created or that were on the market, I am simply
7 very careful not to take credit where credit is not due.
8 So if I list a game that I have created, I am the
9 primary creator of that game and I don't list dozens or
10 hundreds of other games that I may have contributed to,
11 but only partially.
12 BY MR. SOROCCO:
13 Q. Okay. And that care that you took with regard
14 to that 95 percent or taking credit, did you take the
15 same level of care in choosing the language e-commerce
16 server versus e-commerce system?
17 MR. WOO: Objection. Form.
18 THE DEPONENT: As I said, I'm very careful when
19 documenting my opinion. I do the best I can.
20 BY MR. SOROCCO:
21 Q. Okay. And if Robinson did not actually teach an
22 e-commerce server, would it be fair to say that the
23 system should not be interpreted as encompassing a
24 server?
25 **A. I wouldn't say that.**

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1 Q. Why?
2 **A. Well, you're referring to a single sentence in**
3 **an entire declaration, and Robinson speaks for itself.**
4 **It talks about the devices in the block diagram in**
5 **Figure 3, for example, and whether I happen to use the**
6 **term "server" instead of "system" doesn't change what**
7 **Robinson teaches.**
8 Q. Okay. I'm just trying to get an understanding
9 of what the basis for your opinions. And so, you know,
10 I know you're a man that takes care great in things, so
11 I just want to make sure we both understand why you
12 referred in one place to what Robinson teaches as an
13 e-commerce server when the quote is actually e-commerce
14 system. That's all.
15 **A. Is there a question there?**
16 Q. No, there's no question.
17 MR. SOROCCO: How long have we been on the
18 record?
19 THE VIDEOGRAPHER: We've been on the record for
20 one hour and 12 minutes.
21 MR. SOROCCO: I would like to take a -- just a
22 short ten-minute break, please.
23 THE VIDEOGRAPHER: Okay. We are going off the
24 record. The time is 12:11.
25 (A recess transpires.)

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1 THE VIDEOGRAPHER: We are back on the record.
2 The time is 12:22.
3 MR. WOO: Before we get started, I do not want
4 to note that we started about an hour late due to
5 technical difficulties, in that patent owner's crew was
6 not prepared. So the deposition was supposed to begin
7 at 10 o'clock. Our witness, Mr. Crane, has been
8 waiting, and we had to wait an hour, basically, to get
9 started. Thank you.
10 MR. SOROCCO: Are you finished?
11 MR. WOO: I am finished.
12 MR. SOROCCO: Okay. Thank you.
13 Mr. Crane, can we -- I would like to direct your
14 attention, if we could bring Exhibit 1004 back up, Joe.
15 And if you could scroll down to paragraph 180, that
16 would be great.
17 BY MR. SOROCCO:
18 Q. And if we look at Romanette ii, which is element
19 1[a], the language of the claim is:
20 "Receiving a request at said primary electronic
21 device to initiate a locally executed game application
22 that is accessible at said primary electronic device
23 from a user interface with said network."
24 Do you see that language, Mr. Crane?
25 **A. I do.**

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1 Q. Okay. Do you have an understanding of what the
2 term "locally executed" means?
3 **A. I do.**
4 Q. Okay. And can you tell me what that
5 understanding is?
6 **A. I would consider that to be a program -- a**
7 **program executed at a user's electronic device, his home**
8 **computer, whatever.**
9 Q. Okay. And in the next section of that claim, or
10 next sentence, I guess I should say, of the claim, is
11 the way you have it broken out here, you've got the
12 game -- so you have the -- the language is "initiated
13 locally executed game application," and then you go on
14 to say, "that is accessible at said primary electronic
15 device."
16 What -- do you have an understanding of what the
17 phrase -- or the term "accessible" means with respect to
18 this claim?
19 **A. Can be accessed by.**
20 Q. I'm sorry. You broke up a bit for me. Could
21 you repeat your answer.
22 **A. I would say that accessible is, quote, can be**
23 **accessed by.**
24 Q. Can be accessed. Okay.
25 And then it goes on to "at said primary

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1 electronic device from a user -- from a user interface
2 with said network."
3 Is your -- your opinion in paragraph 180, you
4 said that:
5 Robinson teaches this limitation disclosing a
6 user request to download software to be locally
7 executed."
8 Do you see that language?
9 **A. I do.**
10 Q. Okay. And then you go on in his -- locally
11 executed at his primary electronic device. And then you
12 said:
13 "Said locally executed software being the 3D
14 computing environment that can be configured to display
15 realtime avatars and play online games," and then,
16 paren, "locally executed game application."
17 Do you see that language?
18 **A. I do.**
19 Q. Okay. And is it your opinion that -- as stated
20 here in paragraph 180, that an online game is locally
21 executed?
22 **A. Yes.**
23 MR. WOO: Objection. Form.
24 MR. SOROCCO: Was that objection form, Mr. Woo?
25 MR. WOO: Yes, it was. Correct.

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1 BY MR. SOROCCO:
2 Q. And do you believe -- or do you have an opinion
3 that the terms "accessible" and "locally executable"
4 have different meanings, Mr. Crane?
5 **A. Yeah. They are different.**
6 Q. Okay. Can you explain how they're different?
7 **A. Again, locally executed would be executed**
8 **locally on a user's computer. And the fact that the**
9 **user has access to that program would mean it's**
10 **accessible to him.**
11 Q. Okay. At the time that the Robinson patent
12 application was filed, is it a fair statement to say
13 that all online games were locally executable at that
14 time?
15 MR. WOO: Objection. Form.
16 THE DEPONENT: Well, in the first place, I
17 considered these issues from the priority date of the
18 asserted patent. I would have to research based on what
19 you just asked about, which was the date of the Robinson
20 reference.
21 BY MR. SOROCCO:
22 Q. Okay. Well, let's ask, then, at the time of the
23 patent -- the priority date of the '028 patent, at that
24 time do you have an opinion as to whether all online
25 games were locally executable?

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1 **A. Yes.**
2 Q. Okay. And what is that opinion, sir?
3 **A. As of that date, all online games had a locally**
4 **executed program component.**
5 Q. Okay. Thank you.
6 Can we look back a bit at paragraph 72 of
7 Exhibit 1004? I believe this is just in your background
8 section, Mr. Crane.
9 Okay. At paragraph 72, you state that:
10 "Note that a web browser is a computer program
11 that resides locally on a person's personal computer."
12 Do you see that language, sir?
13 **A. I do.**
14 Q. Okay. And I believe we discussed Shockwave and
15 Flash on Monday. But do you have an opinion as to
16 whether Shockwave -- or excuse me. Strike that.
17 Do you have an opinion as to whether a player
18 could play a game with only Shockwave installed?
19 **A. Shockwave was a plug-in to all of the browsers**
20 **at the time. I'm not sure what that would mean to have**
21 **Shockwave only installed.**
22 Q. Okay. If Shockwave was downloaded into a
23 browser of the time period -- strike.
24 Can a player at the time -- could a player at
25 the time of the patent filing or the priority date of

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1 the '028 patent play a game with only Shockwave
2 installed?
3 MR. WOO: Objection. Asked and answered.
4 THE DEPONENT: Yeah, I believe that's the same
5 question, and I'm not sure how Shockwave could be
6 installed only.
7 BY MR. SOROCCO:
8 Q. Do you have an opinion or an understanding that
9 whether a user could go out and download Shockwave
10 directly to their browser?
11 **A. A user could download Shockwave to their**
12 **browser. That's a -- that was a possibility.**
13 Q. Okay. And if the user only downloaded Shockwave
14 to their computer, could they thereafter immediately
15 play a game?
16 MR. WOO: Objection. Form.
17 THE DEPONENT: I don't recall what Shockwave did
18 immediately after downloading.
19 BY MR. SOROCCO:
20 Q. Okay. Would a browser program or plug-in such
21 as Shockwave or Flash serve as a locally executed game
22 application as that term is used in the '028 patent?
23 **A. Yes.**
24 Q. Let's go back to paragraph 181, please.
25 You state in paragraph 181 that:

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1 "Software requested and downloaded into a user's
2 client machine is accessible at said primary electronic
3 device from a user interface with said network as
4 claimed."
5 Do you see that language?
6 **A. I do.**
7 Q. Okay. At what point does the game become
8 accessible at said primary electronic device?
9 **A. Well, a complete answer of that would require a**
10 **lot of context, but generally on a PC, once an**
11 **application is downloaded into the PC, it's accessible**
12 **at that point.**
13 Q. Okay. And with regard to your understanding of
14 the term accessible with respect to online games, where
15 would the game be stored while the user is playing the
16 game?
17 MR. WOO: Objection. Form.
18 THE DEPONENT: As we discussed, I think, on
19 Monday, an online game has a local component, a server
20 component, and a communication component, and you
21 download the game to your electronic device. That game
22 is stored on your home computer, your personal device,
23 and is executed from there.
24 BY MR. SOROCCO:
25 Q. Okay. When you say that it is -- I believe,

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1 download the game to your electronic device, does that
2 mean that it's saved to your local electronic device?
3 **A. It is at least cached, if not also saved**
4 **elsewhere.**
5 Q. And the term cached is spelled c-a-c-h-e-d,
6 correct?
7 **A. Correct.**
8 Q. And what does it mean to be cached in this --
9 with regard to an online game?
10 **A. It means to be stored. But the implication is**
11 **that it is temporary storage that can go away at some**
12 **time without user interaction.**
13 Q. Okay. Prior to the online game being
14 downloaded, saved, or cached through the -- what do you
15 call it -- local electronic device, is the game
16 accessible to that device?
17 MR. WOO: Objection. Form.
18 THE DEPONENT: It can be.
19 BY MR. SOROCCO:
20 Q. Okay. And then would you say that a game is
21 locally accessible when the local device holds the game?
22 **A. If the game is stored locally, then yes, it**
23 **would be locally accessible.**
24 Q. Okay. Do you have an understanding of the term
25 the pri -- "hold" with regard to a primary device and an

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1 online game?
2 **A. I missed a couple words of that question.**
3 Q. Sure. I'll read it to you.
4 Do you have an understanding of the term "hold"
5 with regard to a primary device and an online game?
6 MR. WOO: Objection. Form.
7 THE DEPONENT: That question, you used the word
8 hold, h-o-l-d?
9 MR. SOROCCO: That's correct.
10 THE DEPONENT: I would need some context to even
11 understand what you're asking.
12 BY MR. SOROCCO:
13 Q. Let me ask this way. Can a game application
14 that is being executed locally by a user of a local
15 electronic device, while the game is not stored on the
16 device?
17 MR. WOO: Objection. Form.
18 THE DEPONENT: Yeah, that was like half a
19 question.
20 BY MR. SOROCCO:
21 Q. Okay. Is it possible for a game application to
22 be executed locally by a user of a local electronic
23 device before the game is stored on the local electronic
24 device?
25 **A. If I heard that question correctly, it is**

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1 **possible to execute a program on a local electronic**
2 **device at any time, with or without downloading games.**
3 Q. Let me ask again. Is it possible for a game
4 application, so a game application, to be executed
5 locally by a user of a local electronic device before
6 the game application is stored on the local electronic
7 device?
8 MR. WOO: Objection. Asked and answered. Form.
9 THE DEPONENT: All right. Now that I'm starting
10 to get an idea, can you repeat it?
11 BY MR. SOROCCO:
12 Q. Sure. Is it possible for a game application to
13 be executed locally by a user of a local electronic
14 device before the application is stored on the local
15 electronic device?
16 **A. I would not consider it possible to execute a**
17 **game application that is not stored on the user's client**
18 **machine.**
19 Q. Okay. I'm going to ask another hypothetical.
20 If a game is hosted on a primary electronic
21 device, can a user of a secondary electronic device that
22 establishes a network connection to the primary
23 electronic device execute the game application on the
24 primary electronic device and play the game on the
25 secondary electronic device?

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1 MR. WOO: Objection to form.
2 THE DEPONENT: Well, what your hypothetical does
3 is reverse the second -- first -- primary and secondary
4 devices, so the -- the result is the same. You can host
5 a game on a primary electronic device and download it to
6 a secondary electronic device and play it from there.
7 So in that hypothetical, you just reverse the first and
8 second -- the primary and secondary electronic devices.
9 BY MR. SOROCCO:
10 Q. In order for the secondary electronic device to
11 play it from the primary electronic device, do I
12 understand your testimony to be that it would have to be
13 downloaded from the primary electronic device to the
14 secondary electronic device?
15 MR. WOO: Objection. Form.
16 THE DEPONENT: In order for a game to be
17 executed, its client code has to be downloaded onto the
18 device that's going to execute.
19 BY MR. SOROCCO:
20 Q. Okay. All right. Let's look at paragraph 188
21 in Exhibit 1004, please. Your paragraph 188 starts out:
22 Shown in Figure 9, Robinson discloses the
23 persistent client window 912 integrated into the whole
24 of the 3D computing environment," and then paren, "the
25 locally executed game application," end paren, "using a

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1 window within the desktop window."
2 Do you see that language, sir?
3 **A. I do.**
4 Q. Okay.
5 MR. SOROCCO: And if we pull up Figure 9 of
6 Robinson, which is Exhibit 1008.
7 THE TECHNICIAN: Stand by.
8 MR. SOROCCO: Yes, please, Joe. And if you will
9 scroll down to Figure 9, please. Can you rotate that 90
10 degrees clockwise? I think it's up there at the top of
11 that box. There you go. Okay.
12 BY MR. SOROCCO:
13 Q. Do you recognize Figure 9 from the Robinson
14 patent?
15 **A. I do.**
16 Q. Mr. Crane?
17 **A. I do.**
18 Q. Okay. And do you see the language "persistent
19 client window 912" there in the middle of that figure?
20 **A. Yes.**
21 Q. Okay. Do you have an understanding of what the
22 persistent client window 912 refers to?
23 **A. Yeah. I discuss that in my background**
24 **description of Robinson on around paragraph 93.**
25 Q. Okay. And generally, what is the -- your

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1 understanding of the persistent client window 912?
2 **A. It's a window within the three-dimensional**
3 **desktop that Robinson talks about as part of his**
4 **invention.**
5 Q. Okay. And what is a three -- or do you have an
6 understanding of what a virtual desktop means?
7 MR. WOO: Objection. Form.
8 THE DEPONENT: Yeah. I mean, Robinson talks
9 about this at length. This is -- this is your computer
10 display. But instead of just looking at icons and
11 various backgrounds, it's a 3D view. It's kind of a
12 three-dimensional browser. So, yeah, that's -- that's
13 something that Robinson talks about a lot.
14 BY MR. SOROCCO:
15 Q. Okay. And do you --
16 MR. SOROCCO: Joe, is there a way to put up this
17 Figure 9 side by side or adjacent with paragraph 188 of
18 Exhibit 1004?
19 THE TECHNICIAN: Yes, I can do that. Just give
20 me one moment.
21 MR. SOROCCO: Okay. Okay. Probably need to
22 size, unfortunately, just down just a little bit the
23 Exhibit 1004 so everyone, especially Mr. Crane, can see.
24 That's probably a little too small. Maybe 65 percent.
25 Okay. That way I think we can see the entire

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1 paragraph. There we go.
2 BY MR. SOROCCO:
3 Q. Looking at paragraph 188 --
4 MR. SOROCCO: Actually, let's scroll up to the
5 top of that page 73, Joe.
6 BY MR. SOROCCO:
7 Q. And if we look at Romanette iv, claim element
8 1[c], the language is bolded from the claim:
9 "Automatically integrating business-related
10 content from at least one of said webpages of said
11 secondary electronic device into said locally executed
12 game application during execution of said game
13 application."
14 Do you see that language, Mr. Crane?
15 **A. I do.**
16 Q. Okay. Do you have an understanding of what the
17 term "automatically integrating" means?
18 **A. Well, we have discussed the term "automatic,"**
19 **and as I discussed, it's without manual -- well, it's**
20 **the opposite of manually. Put it that way.**
21 **Automatically integrating is a little more**
22 **flexible. The idea of taking content and integrating it**
23 **into something is -- it can be an automatic -- an**
24 **automated process.**
25 Q. Okay. With respect to game application, which

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1 is mentioned here in claim 1[c], claim element 1[c],
2 what does the term "integration" mean with respect to
3 integration of content into a game application?
4 **A. Well, that covers issues that I have raised in**
5 **my declaration here, bringing in advertisements, putting**
6 **them into a game. Another example in Robinson is**
7 **dragging and dropping. Upon dropping, it gets**
8 **integrated into a 3D environment. You know, integrating**
9 **is including it into the game application.**
10 Q. Okay. And my -- is it your understanding -- or
11 excuse me.
12 Is it your opinion that an advertisement that is
13 displayed in that persistent client window 912 would be
14 integrating business-related content into said locally
15 executed game application?
16 MR. WOO: Objection to form.
17 THE DEPONENT: No. Go ahead.
18 MR. WOO: Objection. Form.
19 THE DEPONENT: I talked over somebody here.
20 BY MR. SOROCCO:
21 Q. Well, let me -- I mean, your counsel objected to
22 the form of the question, but I'm -- I'll read from
23 paragraph 188 of your declaration is, you state that:
24 "Any disclosure of an advertisement displayed in
25 the persistent client window," and then I'll add, which

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1 is when persistent client window 912 shown in Figure 9
2 on the right-hand side, and then you go on, "Teaches the
3 claimed automatically integrating business-related
4 content onto the next page into said locally executed
5 game application."
6 Do you see that language of yours, Mr. Crane?
7 **A. Sadly, I do not. 188 is cut off.**
8 Q. Oh, I'm sorry.
9 MR. SOROCCO: Please scroll down to 188. Yeah,
10 let's do the bottom of one -- of page 73 and top of 74.
11 BY MR. SOROCCO:
12 Q. Now, do you see that language that I basically
13 read the last sentence of, paragraph 188 to the top of
14 paragraph -- or excuse me, to page 74 of the PDF?
15 **A. I see the entirety of paragraph 188.**
16 Q. Okay. And you state that:
17 "Any disclosure of an advertisement into the
18 persistent client window" -- and then I will say that's
19 persistent client window 912 -- "teaches the claimed
20 automatically integrating business-related content."
21 That's -- is that your opinion, Mr. Crane?
22 **A. It's a summary.**
23 Q. What additional information would you add to
24 that to make it not a summary?
25 **A. Well, as we discussed this morning, you know,**

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1 **you nailed down my opinions of advertisements and**
2 **whether there's business-related content. I've**
3 **explained that. So taking in all of the understanding**
4 **of what these terms mean, generally if you take an**
5 **advertisement and it happens to contain business-related**
6 **content, and you integrate it into a game application,**
7 **that's what this paragraph says, and it says that**
8 **Robinson explicitly discloses that.**
9 Q. Okay. So the content, once it is displayed --
10 the advertising content, excuse me, once it's displayed
11 in the persistent client window 912, is it your opinion
12 that that is automatically integrating that
13 advertisement or business-related content into the
14 locally executed game application?
15 MR. WOO: Objection. Form.
16 THE DEPONENT: It is my opinion that that is
17 integrating. Automatically is based on case-by-case
18 basis, but generally it would be automatically
19 integrated.
20 MR. SOROCCO: Okay. Can you, on the right-hand
21 side, Joe, go to what is column 12 at the top of the
22 page? I believe it's probably -- naw, it's going to be
23 down in the document. There you go.
24 Do you see those numbers at the tops of the
25 columns? There you go. You can see it. If you go down

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1 to column 12, that would be perfect.
2 BY MR. SOROCCO:
3 Q. Okay. Column 12, and if you go all the way to
4 the bottom. Column 12, line -- it looks to be about 66
5 and 67, states:
6 "When the computer system detects that the user
7 does not have an application" --
8 MR. SOROCCO: And then if you go down to
9 window -- or column 13, the top of column 13, Joe.
10 BY MR. SOROCCO:
11 Q. -- "window open that covers the user's viewing
12 of the persistent client window or that only the user's
13 computer desktop is being displayed, it will continue to
14 display advertisements or messages within the persistent
15 client window that are being cycled from its buffer."
16 Do you see that language, Mr. Crane?
17 **A. I do.**
18 Q. Okay. Do these passages talk about
19 advertisements being displayed within the persistent
20 client window 912 or being integrated into the
21 application?
22 MR. WOO: Objection. Form.
23 THE DEPONENT: Well, I can't see the previous
24 part. Was that just on 112?
25 MR. SOROCCO: Yeah. If you want to go over

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1 there, Joe, and take him to it.
2 Or if you want to open up 1008 on your computer
3 there so you can see the entirety of it.
4 THE DEPONENT: 1008, was it put into the chat
5 window? I did not see it.
6 MR. SOROCCO: Could you put that in the chat
7 window real quick, Joe?
8 THE TECHNICIAN: Sure. It's already there, but
9 I can redo it.
10 MR. SOROCCO: And it's -- 1008 is a copy of the
11 Robinson '051 patent.
12 THE TECHNICIAN: Okay. I just uploaded.
13 THE DEPONENT: I just opened the chat window,
14 and it's no longer -- so right there. The last one is
15 Exhibit 1008? I mean, yes, I will download it. I have
16 not.
17 MR. SOROCCO: Okay.
18 THE DEPONENT: But all I really want to do is
19 see the bottom of column 12.
20 Okay. Back to 13.
21 So I'm prepared if you could repeat your
22 question.
23 BY MR. SOROCCO:
24 Q. Okay. Do you have an opinion as to what
25 these -- what lines 66 through 67 on column 12 and lines

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1 1 through 5 on the top of column 13 disclose?
2 **A. This section is talking about an option or a**
3 **situation where once it's determined that the**
4 **advertisement's not being covered up, the users viewing**
5 **of the window is not being covered up, it will cycle**
6 **through a buffer of advertisements. So it's about**
7 **displaying advertisements during a particular timeframe**
8 **when they are not being covered up by something else.**
9 Q. And if we go back to paragraph 188 of your
10 declaration, if we scroll down a little bit, you cited
11 those same or similar areas around column 12 in the
12 first para -- or first indented paragraph, line 62 to
13 66. Is that correct, Mr. Crane?
14 **A. That first block quote is 62 to 66.**
15 Q. Okay. It doesn't appear that you quoted lines 1
16 through 5, but you did quote in your second block quote
17 lines 5 through 11 on column -- the top of column 13.
18 Is that correct?
19 **A. That's correct.**
20 Q. Okay. And is it your opinion that those
21 advertisements that are being discussed at the bottom of
22 page 12 -- or excuse me, column 12 and the top of column
23 13 are integrated into the game application, Mr. Crane?
24 MR. WOO: Objection to form.
25 THE DEPONENT: It is my opinion that these

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1 advertisements are being integrated into this 3D desktop
2 application.
3 BY MR. SOROCCO:
4 Q. Fair.
5 I've got a hypothetical for you, Mr. Crane. Do
6 you watch football, by chance?
7 A. I do.
8 Q. Okay. And if you're watching a football match
9 on TV -- is that something that you do, I guess I should
10 ask?
11 A. I have.
12 Q. Okay. And have you ever had an advertisement
13 that pops up during a football match?
14 A. I have seen advertisements pop up.
15 Q. Okay. And do those adver -- did those
16 advertisements block your view of the match, by chance?
17 MR. WOO: Objection to form.
18 THE DEPONENT: The pop-ups that I'm referring to
19 did not.
20 BY MR. SOROCCO:
21 Q. Okay. Why did they not?
22 A. They put advertisements in the bottom right-hand
23 corner so that they can advertise while you're watching
24 the game.
25 Q. Okay. Have you ever had -- or have you ever

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1 been watching a football match where advertisements were
2 laid on top of the video or the content of the match
3 itself?
4 A. Advertisements that I'm thinking of right now
5 are displayed after -- you know, during a break, when
6 the football is not actually being displayed,
7 full-screen commercials, that sort of thing.
8 Q. All right. Okay. And would you say that those
9 advertisements were being displayed alongside the
10 football game, or were they being integrated into the
11 football game?
12 A. I would say that neither of the two examples
13 that I just gave were integrated into the football game.
14 Q. Okay. Does that mean that they were displayed
15 alongside the football game?
16 A. The pop-up ads were displayed alongside a video
17 feed from the football game. Full-screen commercials
18 were not.
19 Q. Okay. If -- another watching a football match,
20 on a computer screen. Have you ever done that,
21 Mr. Crane?
22 A. Never.
23 Q. Okay. Have you ever watched a sporting event of
24 any type on a computer screen?
25 A. Not that I recall. I watch sporting events on

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1 television.
2 Q. Okay. And let me ask, do you have an
3 understanding of what it means to integrate content into
4 a game application?
5 A. I do.
6 Q. Okay. And what is that understanding?
7 A. Well, I was a -- I was very active in
8 advergaming, and if you were integrating an
9 advertisement into a video game, that typically means to
10 put it into the video game in some way so it's part of
11 the game.
12 Q. Okay.
13 MR. SOROCCO: All right. If we can move on real
14 quick to paragraph 201, and we're going to look at --
15 And you can take away Exhibit 1008 on the
16 right-hand side for the moment.
17 Okay. If you zoom in a bit. Thank you.
18 BY MR. SOROCCO:
19 Q. So if you see in Section C, you were talking
20 again about claim 4 that we talked about earlier with
21 regard to Angles, and we again see that same language
22 where the brand -- said branded business-related content
23 is dynamically updated.
24 Do you see that language?
25 A. I do.

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1 Q. Okay. And is the branded -- is the business --
2 excuse me. Strike that.
3 Is the branded business-related content in
4 claim 4 the same as the branded business-related content
5 in claim 3?
6 MR. WOO: Objection. Form.
7 THE DEPONENT: As before, that would be my
8 understanding.
9 MR. SOROCCO: Okay. Let's go on to page 80,
10 paragraph 204, and let's scroll down. We're going to be
11 talking about claim 5 at the moment. Let's scroll down
12 to paragraph 206.
13 BY MR. SOROCCO:
14 Q. This is relating to element 5[a] of claim 5 of
15 the '028 patent. And element 5[a] is executing
16 game-related user actions in said game application as a
17 result of user choices.
18 Do you see that language, Mr. Crane?
19 A. I do.
20 Q. Okay. And you go on in paragraph two
21 thousand -- two zero -- 206 that Robinson teaches this
22 limitation.
23 "A user can click on an avatar section,"
24 quote/unquote, "of an advertisement and choose," paren,
25 "a user choice," end paren, "a virtual-body avatar to

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1 represent the user."
2 And then you have, "See paragraph 101," correct?
3 **A. Yes.**
4 MR. SOROCCO: Okay. Let's go to paragraph 101
5 very quickly. I'm sorry, Joe. If you could go to
6 paragraph 101. Okay. Scroll down a little bit. I just
7 want to make sure that we have that entire quote from
8 Robinson. I believe we do. I don't believe it goes on.
9 Nope.
10 BY MR. SOROCCO:
11 Q. Do you see the quote from Robinson there from
12 column 15, lines 48 through 57, that's displayed on
13 the -- on the screen, the Zoom screen?
14 **A. I do.**
15 Q. Okay. What is the 3D VR environment as
16 described in this passage?
17 **A. Well, that would be cited elsewhere in Robinson.**
18 **I didn't cite to it.**
19 Q. Okay. Do you have an understanding of what a 3D
20 VR environment is?
21 **A. I do.**
22 Q. Okay. What is your understanding?
23 **A. As we discussed on Monday, virtual reality**
24 **environment is one that is -- looks like reality, but**
25 **it's virtual.**

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1 Q. Okay.
2 **A. In some ways, it looks like reality. It is**
3 **three-dimensional, which means it has both X, Y, and Z**
4 **components as far as the code is concerned. So it's**
5 **like, you know, second light, a product where you can**
6 **walk around, interact with other avatars in a -- in a**
7 **virtual environment, a simulation of the real world.**
8 Q. Okay. And if you look there, right before 3D VR
9 environment is the term "if the advertisement is a 3D VR
10 environment." Do you see that distinction there in the
11 first sentence?
12 **A. I do.**
13 Q. Okay. You gave a definition a moment ago of a
14 3D VR environment. How does that change with respect
15 to -- or excuse me. Does it change with respect to the
16 fact that it's relating to an advertisement?
17 MR. WOO: Objection. Form.
18 THE DEPONENT: A 3D virtual environment is what
19 it is. I don't think it would change if it was related
20 to an advertisement.
21 BY MR. SOROCCO:
22 Q. Okay. If we go down one, two, three, four --
23 fourth line in that block quote, the sentence starting:
24 "The user can then virtually walk around that
25 advertisement, meet other virtual users who have entered

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1 into the collaborative VR advertisement in the same way
2 from their own computer desktop."
3 Do you see that language?
4 **A. I do.**
5 Q. Okay. So is it fair to say that the 3D VR
6 environment described here in paragraph -- your
7 paragraph 101, citing column 15, line 48 through 57 of
8 Robinson, refers to a -- advertisements in which the
9 users participate?
10 **A. This 3D VR environment referred to in this block**
11 **quote is explained further in -- just above it in the**
12 **patent. I have a block quote that you will find above**
13 **my paragraph 101 that explains that it's an option, that**
14 **the advertisement can be presented as a 3D advertisement**
15 **and become a 3D spatial environment.**
16 Q. Right. But if we look at that block quote --
17 MR. SOROCCO: Up a little bit. Joe, if you'll
18 scroll up to the block quote at the top of the page.
19 There.
20 BY MR. SOROCCO:
21 Q. "Further, the present invention can be used to
22 embed a similar VR spatial environment behind a static
23 or dynamic two-dimensional advertisement that is placed
24 in the persistent client window 912."
25 Do you see that language, Mr. Crane?

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1 **A. I do.**
2 Q. So when we're talking again about the
3 information that you cited here from Robinson, it
4 related to an advertisement. These paragraphs relate to
5 an advertisement, do they not?
6 **A. They do.**
7 Q. Okay. Is there any reference to a game in these
8 examples that you give from Robinson in paragraphs 100
9 and 101 of your declaration?
10 **A. Well, this entire section that he is describing**
11 **is talking about creating a 3D environment with avatars.**
12 **As the person who created one of the first avatars in**
13 **the video game business, I will tell you that avatars**
14 **speak to game developers as a gaming environment. As I**
15 **said, a 3D environment brings to mind a game like**
16 **Second Life, where you are operating an avatar,**
17 **interacting with everyone. So to a person of ordinary**
18 **skill in the art, when you talk about walking an avatar**
19 **through a VR spatial environment, that is a game**
20 **mechanism.**
21 Q. Okay. Thank you for that. I assume that's your
22 professor hat on, that we discussed on Monday.
23 But again, my question was long, but maybe a bit
24 simpler than that.
25 What I'm asking is, are the block quotes from

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1 Robinson that you included in section 100 and
2 section 101 have -- do they have to do with games?
3 MR. WOO: Objection. Form. Asked and answered.
4 THE DEPONENT: My previous professorial diatribe
5 says that yes, they would be considered that -- to be
6 that case. If you want to ask me if this block quote
7 contains the word "game" absent of either any other
8 disclosures in this specification or a knowledge of a
9 person of ordinary skill in the art, the word "game"
10 does not appear in that block quote.
11 BY MR. SOROCCO:
12 Q. Correct. And does the term "online gaming"
13 appear in either of these block quotes?
14 MR. WOO: Objection. Document speaks for
15 itself.
16 THE DEPONENT: I don't see the term "online
17 gaming" in this quote. I'm not looking at the one
18 that -- or I can scroll down in my -- I --
19 MR. SOROCCO: Yeah, Joe, if you would scroll
20 down to the bottom so he can see it, that would be
21 wonderful. The block quote at the bottom of the page,
22 Joe. There you go.
23 THE DEPONENT: So again, if you're asking if the
24 term "online gaming" appears in this block quote, it
25 does not.

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1 MR. SOROCCO: Okay. Thank you.
2 I think that that concludes my questions on the
3 '028 patent. How -- what's the amount of time on the
4 record at this point?
5 THE VIDEOGRAPHER: We are at two hours and six
6 minutes, about to be two hours and six minutes.
7 MR. SOROCCO: Okay. I'd like to take just a
8 quick ten-minute break to get re-set up. We're going to
9 talk about the '941 patent, i.e., 10,846,941, when we
10 come back.
11 MR. WOO: Actually, Doug, it's been three hours
12 since the deposition was supposed to start. It's
13 actually past the lunch hour for Mr. Crane. We're at
14 1 o'clock Pacific Time.
15 MR. SOROCCO: Okay. Yeah.
16 MR. WOO: So I prefer, David, do you want to
17 take some time for lunch?
18 THE DEPONENT: I always eat lunch, every day.
19 MR. WOO: I think we need some time for lunch,
20 Doug.
21 MR. SOROCCO: Okay. That's fine. I'm -- I'm --
22 being out here on the East Coast, I wasn't -- we already
23 had our lunch. So I apologize.
24 THE VIDEOGRAPHER: Okay. We're going off the
25 record. The time is 13:17.

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1 (A recess transpires.)
2 THE VIDEOGRAPHER: We are back on the record.
3 The time is 14:04.
4 MR. SOROCCO: Okay. And what is the total time
5 on record at the moment, just so I can keep track?
6 THE VIDEOGRAPHER: Two hours and eight minutes.
7 MR. SOROCCO: Okay. All right. We're going
8 to -- as I mentioned before, we all stopped to get a
9 little refreshment. We're going to turn to
10 IPR 2023-00995, relating to US Patent No. 10,846,941,
11 and like we did for the '165 and the '028, we're going
12 to refer to this as the '941 patent.
13 BY MR. SOROCCO:
14 Q. Is that fair, Mr. Crane?
15 **A. Yes.**
16 Q. Okay.
17 MR. SOROCCO: Joe, if we could pull up
18 Exhibit 1004 in the 995 IPR, please.
19 (Referencing Exhibit 1004 IPR 995.)
20 THE DEPONENT: For window management, do you
21 anticipate going back to any of these other windows we
22 have open? It will be easier -- it will be easier to
23 find the one you're looking for or talking about if I
24 don't have other 1004s open. You know what I mean?
25 MR. SOROCCO: No. We will only be opening new

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1 ones now, I believe, here in the '941. So anything we
2 opened previously, you're free to close.
3 THE DEPONENT: Great. Done.
4 MR. SOROCCO: Great. And Joe, are you going to
5 share that in the chat?
6 THE TECHNICIAN: Yes. It's been uploaded.
7 MR. SOROCCO: Great. Mr. Crane and anyone else,
8 you can download a copy of Exhibit 1004 from the chat.
9 And Mr. Crane, as with the other documents,
10 please take your time to look at it, if you wish. Spend
11 as much time with it as you wish. But can you --
12 BY MR. SOROCCO:
13 Q. Do you recognize what's been uploaded -- or
14 what's been put in front of you as Exhibit 1004?
15 MR. WOO: While Mr. Crane is looking at that,
16 Derek, realtime seems to have stopped for me.
17 (Discussion off the record.)
18 THE VIDEOGRAPHER: Do we want to go off the
19 record to discuss this?
20 MR. WOO: Yeah, that -- that -- that's fine.
21 Give me a second, if I can figure out how -- what's
22 going on.
23 THE VIDEOGRAPHER: We are going off the record.
24 The time is 14:08.
25 (A recess transpires.)

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1 THE VIDEOGRAPHER: We are back on the record.
2 The time is 14:10.
3 BY MR. SOROCCO:
4 Q. Okay. I think before we went off the record, I
5 had asked you, Mr. Crane, if you recognize what's been
6 uploaded through the chat, or what has been put in front
7 of you here in the Zoom as Exhibit 1004.
8 **A. I reviewed the version I downloaded, just**
9 **scanned through it. I have no reason to believe it's**
10 **not a true and correct copy of my declaration.**
11 Q. Okay. Great.
12 MR. SOROCCO: Joe, if you could turn to page 55,
13 please. And -- in the document. There we go. And
14 scroll up. Right there. Perfect. You're starting to
15 learn what the sections are we're going to be talking
16 about.
17 Just to get us kind of oriented here, we are now
18 looking at claim 1 of the '941 patent, and this is your
19 analysis -- actually, let's go back two pages, Joe, to
20 page 53.
21 And if we look at Section C, the header is
22 "Ground 1: Claims 1, 3, 5, 7-12, and 23-26 are Obvious
23 Over International Publication WO 02/062436A2," paren,
24 quote, "Pisanich," P-i-s-a-n-i-c-h, end quote, end
25 paren, "In View of the Knowledge of a POSITA."

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1 Do you see that language I just quoted to you,
2 Mr. Crane?
3 **A. I do.**
4 Q. Okay. And if we go back to page 55 of the PDF,
5 of Exhibit 1004, I note that section -- what you've
6 started as section 1 -- or subsection 1 of section C
7 being a claim-by-claim analysis of claim 1 -- excuse me,
8 subsection from there is, uh, A discussing claim 1, and
9 then Romanette i being element 1, being the preamble of
10 claim 1 of the '941 patent.
11 Do you see all of that language there at the top
12 of page 55 of the PDF, Mr. Crane?
13 **A. Right above paragraph 120?**
14 Q. Yes, sir.
15 **A. I see it.**
16 Q. Thank you.
17 What elements of claim 1 -- excuse me. Strike
18 that.
19 Did you look at the Pisanich reference with
20 respect to claim 1 of the '941 patent?
21 **A. I did.**
22 Q. And did you determine certain opinions relating
23 to the disclosure of the '941 patent with respect to the
24 claims of the '941 patent?
25 **A. I formed opinions and documented them in this**

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1 **declaration.**
2 Q. Okay. Excuse me. Let me re-ask that question.
3 And did you determine certain opinions relating
4 to the disclosure of Pisanich, excuse me, with respect
5 to the claims of the '941 patent?
6 MR. WOO: Objection to form.
7 THE DEPONENT: I formed opinions relating to
8 Pisanich and documented them in my declaration.
9 BY MR. SOROCCO:
10 Q. Okay. And what elements of claim 1 were not
11 disclosed in Pisanich?
12 MR. WOO: Objection. Form.
13 THE DEPONENT: My recollection is I went through
14 every element of every asserted claim and found them all
15 to be disclosed to a person of ordinary skill in the art
16 by Pisanich.
17 BY MR. SOROCCO:
18 Q. Okay. And Romanette i, element 1 of claim 1,
19 which is the preamble, states:
20 "One or more non-transitory computer-readable
21 medium storing an interactive software application
22 platform comprising."
23 Do you see that language, sir?
24 **A. I do.**
25 Q. Okay. And do you have any opinions as to the

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1 meaning of the phrase "interactive software application
2 platform"?
3 **A. A software application is an application that**
4 **runs on a computer. If it's interactive, it typically**
5 **means interactive with multiple players, but it doesn't**
6 **necessarily mean that, I guess. It's basically an**
7 **online game.**
8 Q. Okay. So is it your opinion that interactive
9 software application platform is synonymous with an
10 online game?
11 **A. In my opinion, a person of ordinary skill in the**
12 **art would read that phrase as being a game.**
13 Q. Okay. Yeah, one thing that we have not talked
14 about the preambles with regard to any of the claims or
15 any of the -- the -- of the patents that we -- or of the
16 challenged claims of the patents in any of the IPRs is
17 statements that you made typically after the first
18 element of claim 1, being the preamble. You made the
19 statement that "Should the preamble be deemed to be
20 limiting." Do you have an understanding of what that, I
21 guess, sentence fragment or phrase means?
22 MR. WOO: Objection. Form.
23 THE DEPONENT: I'm not an attorney, but I have
24 been in situations where there's been discussions
25 between the parties or between the parties and the

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1 Court, and the determination in some cases is made as to
2 whether or not the preamble is important, basically. I
3 mean, limiting as in includes limitations that limit the
4 claimed invention.
5 BY MR. SOROCCO:
6 Q. Okay. And that's your general understanding
7 from your experiences, correct?
8 **A. That's correct.**
9 Q. Okay. And further, this third line in paragraph
10 20:
11 Paren, "i.e., the claimed software application
12 featuring object-oriented programming techniques."
13 Where does Pisanich disclose oriented
14 programming -- object-oriented programming techniques?
15 **A. I would imagine I captured those citations in my**
16 **paragraphs between 89 and 92.**
17 MR. SOROCCO: Okay. So if we go to paragraphs
18 89 through 92 of your declaration, if we look at,
19 actually, paragraph 92 -- there we go.
20 BY MR. SOROCCO:
21 Q. If you look at paragraph 92 of your declaration,
22 it states:
23 "Pisanich disclosed a game system implemented
24 using an object-oriented design as shown in Figure 3."
25 Do you see that language?

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1 **A. I do.**
2 Q. Does the Figure 3 show -- of Pisanich show an
3 object-oriented design?
4 **A. The detailed description of -- oops -- Figure 3.**
5 **Did I say Figure 2? No, Figure 3.**
6 Q. I'm sorry if I misspoke.
7 **A. I think you asked Figure 2. But to complete my**
8 **answer, the description in the detailed description of**
9 **figures for Figure 3 describes Pisanich as an**
10 **object-oriented design.**
11 Q. Okay. And do you have an understanding of what
12 object-oriented design means?
13 **A. Its general understanding is a design that's**
14 **broken down into objects.**
15 Q. Okay. And if we look at what I believe is a
16 block quote on page 39 below Figure 3 of Pisanich,
17 column 10, lines 1 through 5, it states that:
18 "Referring to Figure 3 in a game system 107,"
19 and then you noted that that was probably a
20 typographical error and should be game system 112,
21 "going on as shown, implemented using an object-oriented
22 design. Pisanich goes on to say the specialized objects
23 preferably store their own data, request data from other
24 objects when needed, and provide data to other objects
25 when requested."

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1 Do you see that language, sir?
2 **A. I do.**
3 Q. Okay. And do you agree with the definition of
4 object-oriented design given here by Pisanich?
5 MR. WOO: Object. Form.
6 BY MR. SOROCCO:
7 Q. Well, let me start, is this sentence, "The
8 specialized objects preferably store their own data,"
9 and then ending with "other objects when requested," is
10 that a definition that Pisanich has given to
11 object-oriented design?
12 **A. I would describe those as features that Pisanich**
13 **wants to -- or would -- would have his objects**
14 **implement.**
15 Q. Okay. So does object-oriented designs -- design
16 preferably store their own data?
17 Scratch that.
18 In object-oriented design, do the specialized
19 objects preferably store their own data?
20 **A. It's not uncommon in object-oriented design for**
21 **the objects to store their own data.**
22 Q. Okay. And is it common in object-oriented
23 design for the objects to request data from other
24 objects when needed?
25 **A. It is not uncommon in object-oriented design for**

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1 **objects to communicate data with other objects.**
2 Q. Okay. And finally, is it common in
3 object-oriented design for the objects to provide data
4 to other objects when requested?
5 **A. That is included in my last statement,**
6 **communication between objects.**
7 Q. Okay. Great.
8 MR. SOROCCO: If we go back to paragraph 20,
9 please -- actually let's go to 127.
10 Okay. Scroll up a little bit. There you go.
11 BY MR. SOROCCO:
12 Q. In Romanette iii, element 1[b], the claim
13 language reads:
14 "A primary application providing the virtual
15 thematic environment and a secondary application within
16 the primary application with secondary application being
17 different from the primary application, the secondary
18 application being launched from the primary application
19 and having first content utilized within a same
20 application environment as second content provided by
21 the primary application."
22 Do you see that claim language?
23 **A. I do.**
24 Q. Okay. And you go in paragraph 127 to state
25 that:

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1 "Pisanich taught the claimed primary application
2 in the form of a game system."
3 Is that correct?
4 **A. That's correct.**
5 Q. And that:
6 "The game system provided a virtual thematic
7 environment, such as a flight simulator."
8 Is that correct?
9 **A. Yes.**
10 Q. Okay. And then:
11 "Whether realtime air traffic information for
12 the flight simulator was served from the server
13 component of the game system. See game data server at
14 paragraph 88."
15 Is that correct?
16 **A. That's correct.**
17 Q. Okay. And the annotated version of Figure 3
18 shown on page 59, if Joe will scroll down. We went over
19 in some detail with regard to the '165 patent that this
20 was a -- this figure was annotated by you. Is that
21 correct?
22 **A. That's correct.**
23 MR. SOROCCO: Okay. Let's go back, Joe, to that
24 Romanette iii on page 58, the claim language.
25 ///

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1 BY MR. SOROCCO:
2 Q. Do you have an understanding, Mr. Crane, of what
3 it means for a secondary application being launched from
4 the primary application as to how its words are used in
5 claim element 1[b]?
6 **A. We discussed this on Monday. If you have a**
7 **module within a program and you invoke it to do**
8 **something, it would be launched.**
9 Q. Okay. And if we go up a little further, it
10 says -- the claim says a primary --
11 MR. SOROCCO: Oops. Sorry. Go back. I meant
12 to stay within that Romanette iii, Joe. Sorry.
13 BY MR. SOROCCO:
14 Q. The claim says:
15 "A primary application providing the virtual
16 thematic environment and a secondary application within
17 the primary application."
18 Do you have an understanding of what the phrase
19 "secondary application within the primary application,"
20 Mr. Crane?
21 **A. Yeah. As I understand it in this case, it would**
22 **give the plain and ordinary meaning to the term**
23 **application, and that if you're going to have something**
24 **that's within something else, it's going to be a program**
25 **or a module. So a secondary application within the**

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1 **primary application is going to be a secondary software**
2 **program within a primary software program.**
3 Q. Okay. And that's based upon your understanding
4 of one of ordinary skill in the art?
5 **A. Yes.**
6 Q. Okay. And if we go down -- oh, let's stay in
7 that Romanette iii. It also states in there -- this is
8 a packed claim element -- that the secondary application
9 being different from the primary application.
10 Do you have an understanding of that claim
11 language?
12 **A. I would expect the secondary program module to**
13 **not be the same as the primary program module.**
14 Q. Okay. And when you say "not be the same," what
15 do you -- what do you mean by that?
16 **A. Different from.**
17 Q. Okay. Is there a level or quantity of
18 difference that's required, based on your answer?
19 MR. WOO: Objection. Form.
20 THE DEPONENT: I believe that a person of
21 ordinary skill in the art would understand what the term
22 "different" means and not -- not requiring any
23 quantification.
24 MR. SOROCCO: Okay. Let's look at Pisanich. It
25 is, Joe, going to be Exhibit 1007 in the 995 IPR.

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1 THE TECHNICIAN: Just a moment.
2 (Referencing Exhibit 1007 IPR '995.)
3 THE TECHNICIAN: It's been uploaded to the chat.
4 MR. SOROCCO: Okay. And I believe I probably
5 made a mistake there, so I actually need you to -- you
6 can keep that up for the moment.
7 Can you bring up Exhibit 1001 and publish it to
8 everyone, which is -- Exhibit 1001 is a copy of US
9 Patent No. 10,846,941.
10 THE TECHNICIAN: Counsel, I'm not seeing a 1001
11 and then the last three numbers ending in 941.
12 MR. SOROCCO: Hmm. Okay. Let me upload that
13 real quick.
14 Joe, do you see the uploaded US Patent
15 No. 10,846,941?
16 THE TECHNICIAN: Let me just refresh real quick,
17 because I just refreshed.
18 Okay. Yep. I see it here now. Give me one
19 second to download it.
20 It's up on the screen and it's also uploaded
21 into the chat.
22 MR. SOROCCO: All right. Thank you.
23 BY MR. SOROCCO:
24 Q. Okay. What's in front of everybody right now,
25 what's been published to the chat, is Exhibit 1001,

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1 which is a copy of US Patent No. 10,846,941 submitted by
2 the petitioners in the IPR 2023-00995.
3 (Referencing Exhibit 1001 IPR 2023-00995.)
4 MR. SOROCCO: Could you go to column 13 of the
5 '941 patent, Joe?
6 Okay. And then can you scroll down a ways?
7 We're going to be lines 53-ish. Excellent. And can you
8 highlight as I read, for me? I'm going to start with
9 line 53.
10 "Methods and systems consistent with the present
11 invention are carried out by providing an input means or
12 user selection means, including hot clickable icons,
13 et cetera, selection buttons, in a menu, dialogue box,
14 or a role-down window of an interface provided at the
15 client, and user may input commands through a keyboard,
16 pen, stylus, mouse, speech, processing means, touch
17 screen, or other input/selection means."
18 If you can stay -- stop there for a moment.
19 BY MR. SOROCCO:
20 Q. Mr. Crane, did you see that language that's
21 highlighted on the screen and that I just read?
22 **A. I see it.**
23 Q. Okay. In that highlighted information, right
24 one, two, three, four -- the fifth line of highlighted
25 information down, it is an interface provided at the

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1 client.
2 Do you see that language?
3 **A. Yes.**
4 Q. In the context of the '941 patent, do you have
5 an understanding of the term an interface?
6 **A. An interface without context is, at least in**
7 **computer gaming or computer software, is the way on**
8 **which the computer -- a user interfaces with the**
9 **program. This listing you gave here is a whole bunch of**
10 **examples of interface methods.**
11 Q. Okay. And in answer to my question, you used
12 the word that I asked you to define or if you had a
13 definition. So can we try again?
14 You have -- you said you have a definition of an
15 interface. Can you be a bit more specific as to what
16 that definition is, please?
17 MR. WOO: Objection. Mischaracterizes the
18 testimony. Form.
19 THE DEPONENT: I have never been asked to define
20 interface. It's an interface. I understand you didn't
21 like the fact that I used the term interface in my
22 definition of interface, but it is a way of connecting a
23 user to a computer or a piece of software.
24 BY MR. SOROCCO:
25 Q. And when you used the term "connecting" in your

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1 definition, I believe you said it is a way -- your
2 answer was, "But it is a way of connecting a user to a
3 computer or a piece of software."
4 Would it be fair to say that connecting a user
5 means that the user is able to communicate with or
6 interact with the interface?
7 MR. WOO: Objection. Form.
8 THE DEPONENT: Well, I mean, to be pedantic,
9 this is talking about a roll-down window of an
10 interface, and that in itself is just one small item.
11 If you asked me if I thought a user could communicate to
12 software using a selection from a pull-down menu, I
13 would say yes.
14 BY MR. SOROCCO:
15 Q. Okay. And there's -- in that language that I
16 read to you, there's lots of different types of ways for
17 communication, isn't there? Dialogue boxes are listed,
18 a -- buttons, hot clickable icons. The user may input
19 commands for a keyboard pen stylus. Does it not,
20 Mr. Crane?
21 **A. In the highlighted section, there's a laundry**
22 **list of systems or interface devices described by this**
23 **patent language as an input means, or user selection**
24 **means.**
25 Q. Okay. If we go down a little further and beyond

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1 where I highlighted, the selection means that you
2 mentioned may also be constituted by a dedicated piece
3 of hardware or its functions may be executed by code
4 instructions executed on the client processor involving
5 a display unit for displaying a selection window and
6 keyboard for entering a selection, for example.
7 Do you see that language I just read?
8 **A. I do.**
9 Q. Okay. And do you have an understanding of the
10 type of communications that are described in this
11 overall paragraph from line 53 through 65 of column 13?
12 MR. WOO: Objection. Form.
13 THE DEPONENT: I would say that language pretty
14 concisely defines a selection means that may be hardware
15 or software. To me, that means it could be a keyboard
16 or a soft keyboard on the screen, for example. And it
17 could involve a display unit, and it could involve a
18 keyboard.
19 BY MR. SOROCCO:
20 Q. Okay. Would it be fair to characterize these --
21 this laundry list, I think as you put it, as ways of the
22 user and the computer communicating with one another?
23 MR. WOO: Objection. Form.
24 THE DEPONENT: I would describe the input means
25 as a way for the user communicating to the computer or

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1 the software.
2 BY MR. SOROCCO:
3 Q. Okay. And are there -- or do you have an
4 opinion as to the computer -- these means defining a
5 computer communicating back to a user?
6 **A. Well, that language says that the selection**
7 **means may involve a display unit.**
8 Q. Okay.
9 **A. If there's a display unit, the computer may be**
10 **communicating back to a user.**
11 Q. Okay. So is it fair to say that this paragraph
12 discusses two-way communication between a user and a
13 computer or software, using your language?
14 MR. WOO: Objection. Form.
15 THE DEPONENT: I would probably not characterize
16 it that broadly. This section, the highlighted section,
17 plus the one below, talks about input means, and those
18 input means may use a display unit. So whether or not
19 there's actually communication explained here back from
20 the -- from the computer just because there's a display
21 unit, I'm not sure that's necessarily true.
22 BY MR. SOROCCO:
23 Q. While it may not be necessarily true, it may be
24 necessarily true. Is that correct?
25 MR. WOO: Objection. Form.

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1 THE DEPONENT: No. Again, these are input
2 means, and the input means may involve a display unit,
3 but it doesn't talk about whether or not that display
4 unit is communicating information back to the user.
5 BY MR. SOROCCO:
6 Q. Isn't it true, though, that down below, on
7 line 60, that the selection means is also -- may include
8 a display unit for displaying a selection window?
9 MR. WOO: Objection. Form. Document speaks for
10 itself.
11 THE DEPONENT: It does say that the selection
12 means may include a display unit for displaying a
13 selection window.
14 BY MR. SOROCCO:
15 Q. Okay. So the display of a selection window
16 would provide communicate -- communication back from a
17 computer or software -- or excuse me, the selection
18 means -- strike.
19 Isn't it true that a display unit of the
20 selection means would provide communications back to a
21 user?
22 MR. WOO: Objection. Form.
23 THE DEPONENT: Well, I have answered the
24 question three different ways, and as I'm saying is the
25 selection means may involve a display unit, but there's

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1 nothing here saying that there's information conveyed
2 back from the computer to the user on that display unit.
3 BY MR. SOROCCO:
4 Q. So the language involving a display unit for
5 displaying a selection window does not indicate to you
6 that it is displaying information back to a user?
7 **A. It's not an indication that it's communicating**
8 **information back to a user. Simplest example would be**
9 **it's displaying buttons that are clickable.**
10 Q. Isn't the fact that it's displaying buttons
11 that's clickable providing information back to a user?
12 MR. WOO: Objection. Form.
13 THE DEPONENT: Not necessarily.
14 BY MR. SOROCCO:
15 Q. I think your answers speak for themselves here,
16 Mr. Crane. Let's go back to -- let's go to paragraph
17 142. Excuse me, Exhibit 1004, your declaration. And,
18 in fact, let's go back right above paragraph 138, and
19 it's Romanette iv.
20 MS. ROBL: Pardon me. But you're in the wrong
21 Exhibit there. That's the 954 exhibit, 1004.
22 MR. SOROCCO: I think it's, Joe, the third one
23 over from the right.
24 Okay. Let's go to, again, between paragraph 137
25 and 138. I think again we're in the wrong -- sorry.

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1 Joe, we should be in Exhibit 4, 1004, in IPR 2023-00995.
2 There we go. And if you could go to
3 paragraph 137, or right below paragraph 137, please.
4 There. Perfect.
5 BY MR. SOROCCO:
6 Q. In the middle of this page, about Romanette iv,
7 which is claim element 1[c], it starts out:
8 "A graphics user interface module, including
9 software that renders graphical display elements."
10 Do you see that plain language, Mr. Crane?
11 **A. I do.**
12 Q. Okay. In the middle of that claim, it states,
13 a -- "the GUI" mod -- "module."
14 Do you know to what that language refers?
15 **A. I would have to confirm, but I would assume that**
16 **the graphical user interface that's described as a**
17 **graphical user interface is the first reference in this**
18 **claim to a graphical user interface; and, therefore,**
19 **the -- the one that uses the V is referring to that one.**
20 Q. Okay. And -- and it states that the GUI, or
21 GUI, module providing according to claim element 1[c].
22 What does the GUI module provide?
23 **A. A GUI module, which is a graphical user**
24 **interface, provides a first user interface that is**
25 **associated with the primary application, enabling the**

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1 **user to access the primary application.**
2 Q. Through the first user interface, correct?
3 **A. Yes.**
4 Q. And then it goes on, does it not:
5 "And a second user interface associated with the
6 secondary application and enabling the user to access
7 the secondary application through the secondary user
8 interface"?
9 Does it not?
10 **A. I see that.**
11 Q. Okay. So again I will ask, what does the GUI
12 module provide within the framework of claim element
13 1[c]?
14 **A. The GUI module provides a first user interface**
15 **that is associated with the primary application,**
16 **enabling the user to access the primary application**
17 **through the first user interface.**
18 Q. Okay.
19 **A. There's a secondary user interface described in**
20 **this claim as well.**
21 Q. Okay. And that second user interface is also
22 provided by the GUI module, is it not?
23 MR. WOO: Objection. Form.
24 BY MR. SOROCCO:
25 Q. Mr. Crane?

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1 **A. Yeah, I'm looking to see if I consider that and**
2 **before a second user interface to be provided by the GUI**
3 **module.**
4 Q. Okay.
5 **A. I read it as a separate second user interface.**
6 Q. But you do not read this claim element that the
7 GUI module provides both a first user interface and a
8 second user interface. Is that correct?
9 MR. WOO: Objection (inaudible).
10 THE DEPONENT: As I sit here today, I'm not sure
11 how I read it while I was writing this -- this
12 declaration. It's certainly a -- a gray area, a
13 possible source of confusion.
14 BY MR. SOROCCO:
15 Q. What do you mean, a possible source of
16 confusion, Mr. Crane?
17 **A. It could be read either way, to me.**
18 Q. Well --
19 (Simultaneous speakers.)
20 BY MR. SOROCCO:
21 Q. -- looking at it -- I mean, looking at it
22 grammatically, doesn't it say the GUI module providing a
23 first user interface with certain characteristics,
24 comma, and a second user interface associated with?
25 MR. WOO: Objection. Form.

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1 THE DEPONENT: It could be read that way, since
2 this claim starts talking about a graphic user
3 interface.
4 MR. SOROCCO: Okay. Thank you.
5 We can move forward to paragraph -- I'm sorry.
6 I've lost it. One moment. Hmm.
7 Okay. If we can go to page 94. And scroll
8 down, please, to section D.
9 BY MR. SOROCCO:
10 Q. In section -- or header D, excuse me, you
11 stated:
12 "Ground 2 per: Claims 1, 3, 5, 7 to 12 and 23
13 to 26 are obvious over PSO manual in view of the
14 knowledge of a POSITA."
15 Is that correct?
16 **A. I see that.**
17 Q. And PSO manual talks about, if we look at
18 paragraph -- or refers to what is outlined in
19 paragraph 221 is the Phantasy Star Online game as
20 documented in the PSO manual, correct?
21 **A. Yes.**
22 Q. Okay. And we discussed the PSO manual earlier
23 with regard to the '165 patent, correct?
24 **A. We did.**
25 Q. Okay. If we could go to page 97 within the PDF

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1 document, and if we go to Romanette ii, which is claim
2 element 1[a], and it states:
3 "At least one thematic publishing logic module
4 containing virtual thematic environment rules."
5 Do you see that language, Mr. Crane?
6 **A. I do.**
7 Q. Okay. And then you have paragraphs 228, which
8 discusses what you believe the PSO manual taught, and
9 then 229 talks about the virtual thematic environmental
10 rules, and then at 230 you summed up your opinion, if I
11 may characterize it that way, that the PSO manual
12 disclosed or at least rendered obvious in view of the
13 knowledge of a POSITA this claim element.
14 Do you see all that language?
15 **A. Yes.**
16 Q. Okay. And this claim element, referring to
17 claim element 1[a], correct?
18 **A. Correct.**
19 Q. Okay. Where does the PSO manual teach a
20 thematic publishing logic module?
21 **A. I refer back to my paragraph 110.**
22 Q. Okay.
23 **A. Where I show what is shown that the game will do**
24 **on its screen, which shows the virtual thematic**
25 **environment.**

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1 Q. Okay. So let's go back to paragraph 110 on
2 page, oh, 50.
3 Okay. Looking at paragraph 110, where in
4 paragraph 110 of your opinion, Mr. Crane, does it
5 disclose a thematic publishing logic module?
6 **A. My analysis here is what a person of ordinary**
7 **skill in the art would infer from this picture, and that**
8 **is that there is a virtual thematic environment. That**
9 **virtual thematic environment, the theme is some foreign**
10 **alien planet. It is a 3D virtual environment with**
11 **players fighting each other, players running into**
12 **non-player characters. A lot of that can be seen in the**
13 **screen, and a person of ordinary skill in the art would**
14 **understand that if he sees this screen on a Dreamcast,**
15 **that Dreamcast is implementing a virtual thematic**
16 **module.**
17 Q. It's a -- the language is thematic publishing
18 logic module of claim element 1[a], and I appreciate
19 that discourse, again, Professor Crane. But, again, if
20 I'm looking at paragraphs 110, 228, and 229 of your
21 opinion, where in those paragraphs do you discuss where
22 PSO manual discloses a thematic publishing logic module?
23 **A. I'm glad you appreciate my answer because the**
24 **answer is the same. It is an inference that would be**
25 **made by a person of ordinary skill in the art. This**

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1 **can't appear on the Dreamcast screen unless there is a**
2 **module that is publishing it to the screen.**
3 Q. Okay. And you used the term "inference," did
4 you not?
5 **A. I did.**
6 Q. Okay. What do you mean by an inference?
7 **A. It is a logical conclusion, in this particular**
8 **case, an inescapable logical conclusion, that if there**
9 **is something that you see on the screen, there is a**
10 **software module that is publishing it to the screen.**
11 Q. An inescapable logical conclusion is your
12 definition of inference. Did I understand that correct,
13 Mr. Crane?
14 **A. In this context, that is the case.**
15 MR. WOO: Objection. Form. Mischaracterizes
16 the testimony.
17 MR. SOROCCO: I'm going to object to your
18 objection there, Phil. I read his language back to him
19 directly.
20 MR. WOO: No. But he -- he defined it, so
21 that's the objection.
22 MR. SOROCCO: I -- did that -- did the realtime
23 get your objection correct there, Phil? I don't feel
24 like it did.
25 MR. WOO: I think the realtime transcription is

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1 wrong. It's -- my objection is, he did not define -- he
2 did not define it.
3 BY MR. SOROCCO:
4 Q. Okay. Let's go back, then. I just wanted to
5 make sure that we got the objection correct.
6 I said -- I asked the question, "What do you
7 mean by an inference, Mr. Crane?"
8 Your response was, "It's a logical conclusion,
9 in this particular case, an inescapable logical
10 conclusion, that there is something that you see on the
11 screen that there's a software module that is publishing
12 it to the screen."
13 And I asked the question, "An inescapable
14 logical conclusion is your definition of inference?"
15 I understand Mr. Woo's objection.
16 Is it your -- is your definition of inference an
17 inescapable logical conclusion, Mr. Crane?
18 MR. WOO: Objection. Form.
19 THE DEPONENT: Well, without a dictionary, I
20 wouldn't want to be able to tell you what inference
21 means in every connotation. The best way to explain
22 that is, if you replaced my testimony where I used
23 inference with the term "inescapable logical
24 conclusion," then it would still be accurate.
25 MR. SOROCCO: Okay. Let's go to page -- or

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1 paragraph 234 -- excuse me, paragraph 232.
2 BY MR. SOROCCO:
3 Q. Okay. Paragraph 232 of your opinion is:
4 "The PSO manual also disclosed launching the
5 chat and mail function from the game (primary
6 application) either through the soft keyboard or a
7 Dreamcast keyboard," paragraph 103, "or with a shortcut
8 interface," and then you include page 25 of the PSO
9 manual.
10 Can you -- do you have an understanding of the
11 term "launching" as it's used within the paragraph 232?
12 **A. The PSO manual talks about how you can bring up**
13 **the chat function, which would be a module within the**
14 **primary application, and I would consider that to be**
15 **launching the chat module.**
16 Q. Okay. Does -- does the PSO manual page 25
17 snippet that you've provided here on page 98, does it
18 include or use the word "launching" or "launch"?
19 **A. This snippet of the manual does not use the word**
20 **"launch" or "launching."**
21 Q. Okay. Let's go now to paragraph 234 and,
22 actually, Romanette iv.
23 Okay. If you look at Romanette iv, it's element
24 1[c] of claim 1 of the '941 patent. It starts out:
25 "A graphics user interface GUI module, including

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1 software that renders graphical display elements."
2 Do you see that language, Mr. Crane?
3 **A. I do.**
4 Q. Does -- where in the PSO manual is a GUI module
5 that includes software disclosed?
6 **A. In this section, I -- in my discussion of the**
7 **GUI module, I refer to my paragraph 103 above.**
8 Q. Okay. And where in the PSO module (sic) does it
9 technically describe how a GUI module provides a first
10 user interface?
11 **A. Moving back to paragraph 103.**
12 Q. Okay. And where in the PSO manual does it
13 technically describe how a second user interface is
14 associated with the secondary application?
15 **A. The PSO manual shows visually the popping up of**
16 **the chat window, and it is inescapable logical**
17 **conclusion to a person of ordinary skill in the art,**
18 **looking at what can be put on the screen, that there is**
19 **a module that publishes that to the screen.**
20 Q. Okay. Let's go to paragraph -- or Romanette b,
21 right under paragraph 237.
22 As disclosed in the PSO manual, Mr. Crane, would
23 you consider word select a secondary application?
24 MR. WOO: Objection. Form.
25 THE DEPONENT: I would.

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1 BY MR. SOROCCO:
2 Q. Okay. I'm going to say last question, assuming
3 that I can take a few -- ten minutes to speak with my
4 colleagues.
5 But based upon that hypothetical, Mr. Crane,
6 where in the -- or strike that.
7 Does the PSO manual teach any technical
8 information about how the PSO game was programmed?
9 MR. WOO: Objection. Form.
10 THE DEPONENT: The PSO manual describes the
11 operation of a piece of software, and if it is a person
12 of ordinary skill of the art looking at this manual,
13 there are teachings in this manual to that person based
14 on his experience.
15 BY MR. SOROCCO:
16 Q. Is the PSO manual a technical manual, Mr. Crane?
17 MR. WOO: Objection. Form.
18 THE DEPONENT: I know what you're looking for,
19 but my previous answer stands.
20 MR. SOROCCO: Okay. If I could take ten minutes
21 in our room, and then I will tender the witness, Phil.
22 MR. WOO: Okay. Ten minutes.
23 MR. SOROCCO: Thanks.
24 THE VIDEOGRAPHER: We are going off the record.
25 The time is 15:12.

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1 (A recess transpires.)
2 THE VIDEOGRAPHER: We are back on the record.
3 The time is 15:25.
4 MR. WOO: Okay. Mr. Crane, thank you for your
5 time today just getting through this.
6 EXAMINATION
7 BY MR. WOO:
8 Q. Counsel asked you earlier what you did to
9 prepare for your cross-examination. That was a question
10 on Monday.
11 Do you recall that?
12 **A. I do.**
13 Q. And you testified that you reviewed some
14 declarations. Is that correct?
15 **A. Yes.**
16 Q. And you testified that one of those declarations
17 was from Mr. Yoshihiro Sakuta.
18 Do you remember that?
19 **A. Yes.**
20 MR. SOROCCO: Objection. Goes beyond
21 cross-examination. New evidence.
22 BY MR. WOO:
23 Q. Who is Mr. Sakuta?
24 MR. SOROCCO: Again, objection under 37 CFR
25 Section 42.64. I'm objecting to the admissibility of

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1 this evidence in this deposition.
2 BY MR. WOO:
3 Q. You may answer, Mr. Crane.
4 **A. As I testified on Monday, Mr. Sakuta is the**
5 **author of the PSO manual and signed a declaration**
6 **attesting to that fact.**
7 MR. SOROCCO: Phil, according to 37 CFR Section
8 42.64, once I've made the objection, it is on you to
9 provide evidence to cure my objection; otherwise,
10 we're -- we are back to the board.
11 MR. WOO: We can talk to the board, but he --
12 you -- you asked it and he raised it.
13 MR. SOROCCO: I --
14 MR. WOO: That's it.
15 MR. SOROCCO: I asked what he did to prepare,
16 and I never asked him a single question about any of
17 those declarations, Phil.
18 MR. WOO: Well, it's -- so on -- adding these
19 for the -- I'm putting these in as the exhibits.
20 Do -- does the court reporter and the tech --
21 MR. SOROCCO: Again, you're going to get a
22 motion to exclude. I did not ask a single question on
23 those exhibits or declarations that you're asking about,
24 Phil.
25 MR. WOO: Okay.

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1 MR. SOROCCO: Not a single question. And I did
2 that very, very purposely because Mr. Crane tipped his
3 hand at the beginning. So --
4 MR. WOO: I'm entering these as exhibits.
5 Court Reporter, how do you -- how do you advise
6 on marking these documents, these exhibits, please?
7 MR. SOROCCO: You cannot -- you cannot admit
8 these exhibits until it is proven that they have -- that
9 they's admissible, Phil, under 37 CFR Section 42 --
10 MR. WOO: We can go to the board on this, but we
11 will proceed.
12 MR. SOROCCO: We will go -- we will go to the
13 board. I am not allowing this evidence to be admitted
14 into the deposition.
15 MR. WOO: So --
16 MR. SOROCCO: Phil.
17 MR. WOO: So continuing on, continuing on,
18 Mr. Crane.
19 BY MR. WOO:
20 Q. Who is Mr. Sakuta?
21 MR. SOROCCO: Objection. Out of scope of cross.
22 Inadmissible.
23 MR. WOO: No. That -- that was part of your
24 question. So --
25 MR. SOROCCO: It was not my question. I -- my

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1 question was, is what did you review. And he told -- he
2 made a comment about some declarations, and I had not a
3 single follow-up question about any of those
4 declarations, Phil.
5 MR. WOO: Okay. Well, let's go to the board.
6 Give me a second.
7 MR. SOROCCO: We will.
8 MR. WOO: We will go to the board.
9 MR. SOROCCO: Okay. Let's go to the board.
10 Well, we're not going to the board right now.
11 It's 6:30 on the East Coast. So --
12 MR. WOO: Okay. Hold on. Let's go off the
13 record for a moment.
14 THE VIDEOGRAPHER: We are going off the record.
15 The time is 15:29.
16 (A recess transpires.)
17 (Monté Squire enters the proceeding.)
18 THE VIDEOGRAPHER: We are back on the video
19 record. The time is 15:38.
20 MR. WOO: Okay. I would like to make an --
21 introduce my partner, Monté Squire, also a partner of
22 Duane Morris, also representing petitioner in these
23 proceedings, these IPR proceedings. Mr. Squire is a
24 former PTAB judge with experience at the board level,
25 and I'm going to continue with this line of -- I'm going

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1 to continue with this line of questioning. I would like
2 to -- I've explained the situation to Mr. Squire.
3 Mr. Squire, could you please inform counsel
4 about how the proceedings should work in this
5 deposition?
6 MR. SQUIRE: Sure. It is my understanding that
7 there is an objection to evidence being introduced on
8 redirect. And under the practice at the board and just
9 the standard practice in connection with these
10 depositions, on redirect, that is counsel's opportunity
11 to ask questions, but also introduce evidence or
12 exhibits as necessary. And to the extent that there's
13 an objection to that evidence, that objection is to be
14 lodged, but it's certainly no basis to foreclose the
15 entry of the exhibit or to foreclose any questioning
16 about the exhibit. That's certainly an issue that
17 usually gets taken up and should be taken up properly as
18 part of the motion to preclude, which is later -- which
19 is later in the trial schedule.
20 MR. WOO: And with that, if you could stay on,
21 Monté.
22 Counsel, you introduced this. You opened the
23 door on this. Your question -- almost your very first
24 question was, and I quote, and this appears at the
25 transcript at page 10, and this is the Monday

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1 transcript, page 10, lines 11 through 12:
2 "What did you do to prepare for your
3 cross-examination today," unquote?
4 That is your question.
5 MR. SOROCCO: And you believe -- and you
6 believe -- Phil, and you believe that question opened
7 the door to declarations from third-party witnesses that
8 you did not provide as supplemental evidence earlier in
9 the proceedings? Just because you --
10 (Simultaneous speakers.)
11 MR. SOROCCO: Because you moved -- no. You
12 missed your date for supplemental evidence, and you're
13 now trying to back it in with a very cute little
14 argument.
15 And I appreciate Mr. Squire coming on at a late
16 time. However -- and the fact that he was a former PTAB
17 judge. But at this point, he is a -- he is here on
18 behalf of a client, not here on behalf of the PTAB, and
19 while I appreciate his experience and I assume his
20 knowledge, I don't care. I am not allowing these
21 documents to be entered into the record at this point in
22 time.
23 MR. WOO: They will come into the record. If
24 you have any objections to this, you can take it up on a
25 motion to exclude after we finish up the deposition.

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1 This is my --
2 MR. SOROCCO: I will take it up on a motion to
3 exclude. I'm calling off the deposition. I'm ending
4 the deposition right here and now.
5 MR. WOO: If you would like to jump off -- if
6 you would like to exit the deposition, you are welcome
7 to. I will continue with my redirect.
8 MR. SOROCCO: You do not get -- your redirect is
9 limited to what he filed in the declaration -- in his
10 declaration of exhibits pursuant to --
11
12 (Simultaneous speakers.)
13 MR. SOROCCO: -- 37 -- 37 CFR 42.53(d)(5)(2).
14 MR. WOO: That's completely incorrect, Counsel.
15 MR. SOROCCO: Well, that's not -- you may think
16 so, but I disagree.
17 MR. WOO: Well, we can have that disagreement,
18 but we will continue on.
19 So Court Reporter, please advise on how you
20 would like to mark these exhibits. I will have some
21 questions for the witness regarding these exhibits.
22 MR. SOROCCO: That's extremely scuzzy, Phil.
23 I'll just let you know that, on the record.
24 THE REPORTER: If you want to designate them
25 whatever exhibit you desire them to be marked as, either

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1 next in order or another number or letter, that's your
2 call.
3 MR. WOO: Let's call these deposition exhibits
4 petitioner's deposition exhibits, please.
5 MR. SOROCCO: At this point in time, I'm
6 suspending the deposition. You're oppressing. You're
7 harassing. You're doing all the stuff you were doing
8 last time. I'm suspending the deposition, Phil.
9 MR. WOO: If you want to leave, that's fine.
10 MR. SOROCCO: We are suspending the deposition.
11 Once again, as I told you Monday night, it is not a may,
12 it is not a could suspend, it is shall suspend, or will
13 suspend. Okay? We're suspending the deposition. The
14 parties walk away and we go to the board. Okay?
15 MR. WOO: No, that's not correct. So if you
16 want --
17 MR. SOROCCO: Yes, it is. That's what happened
18 the other night.
19 MR. WOO: -- that's fine.
20 MR. SOROCCO: Phil, that's what happened the
21 other night.
22 MR. WOO: No.
23 MR. SOROCCO: We're suspending the deposition.
24 All right? And if you go on --
25 (Simultaneous speakers.)

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1 MR. SOROCCO: -- I will bring it up to the
2 board -- to the board for sanctions.
3 Once again, we are bringing -- you're harassing,
4 you're oppressing this deposition. You're pushing
5 things that are not intended to be entered. And we are
6 suspending the deposition tonight.
7 MR. WOO: You opened the door on this. If you
8 would like --
9 MR. SOROCCO: I didn't open the door.
10 MR. WOO: (Inaudible).
11 MR. SOROCCO: Those questions did not open the
12 door.
13 MR. WOO: -- door on this.
14 MR. SOROCCO: Well, then we'll have the board to
15 make that decision in the morning. I am suspending the
16 deposition tonight, Phil, period.
17 MR. WOO: So you may leave and we'll continue.
18 MR. SOROCCO: No. That doesn't work that way.
19 MR. WOO: Yes, it does work that way.
20 MR. SOROCCO: When I say the deposition is
21 suspended, the parties walk away.
22 MR. WOO: This is unreasonable on your part.
23 This is unreasonable and very, very harassment. You
24 started this and --
25 MR. SOROCCO: Right.

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1 MR. WOO: -- you will not allow redirect.
2 That's completely unreasonable.
3 MR. SOROCCO: No, it's not unreasonable. I'm
4 not allowing redirect on evidence that is not allowed to
5 come in, Phil.
6 And, again, I'm suspending the proceedings if
7 you go on at this point, you're going on in
8 contravention of the consolidated trial guidelines that
9 stand -- state specifically that in these situations the
10 deposition must be suspended. I'm suspending the
11 deposition, period.
12 MR. WOO: Monté, I would like you to --
13 MR. SOROCCO: Monté, at this point in time, is
14 not --
15 MR. WOO: Monté is not --
16 MR. SOROCCO: -- part of the deposition.
17 MR. WOO: Monté --
18 MR. SOROCCO: He's not a part of this
19 deposition. You started in defending this deposition.
20 MR. WOO: He is counsel of record in this IPR
21 proceeding, Doug.
22 MR. SOROCCO: He is not. He did not.
23 MR. WOO: Are you trying to tell us now that you
24 can dictate which counsel of record in the IPR
25 proceeding are allowed to represent and attend a

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1 deposition, Doug? That is --
2 MR. SOROCCO: I didn't say he couldn't attend
3 the deposition. I said speaking in the deposition,
4 Phil. You started with taking the deposition. Just
5 like I can't hand off the cross-examination to somebody
6 else once I've started cross examination, Phil. All
7 right?
8 So again, I'm suspending the proceedings,
9 pending going to the board for a ruling on whether this
10 evidence comes in or not.
11 MR. WOO: So we will continue, and if you --
12 MR. SOROCCO: You don't continue -- you don't
13 continue, Phil. It's simple in the consolidated trial
14 guidelines. Okay? The proceedings are suspended, just
15 like we did Monday night and we were going to the board
16 Tuesday morning when the parties agreed otherwise.
17 Okay?
18 MR. WOO: That's incorrect, and we will
19 continue.
20 MR. SOROCCO: You are not going to continue,
21 Phil. I will --
22 MR. WOO: We are going to continue.
23 MR. SOROCCO: You're not going to continue.
24 MR. WOO: Derek, are you prepared?
25 THE REPORTER: The --

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1 MR. SOROCCO: Once again, Phil, if the objecting
2 witness or party so demands, the testimony must be
3 suspended for the time necessary to obtain a ruling from
4 the board. Okay? The deposition is suspended, period.
5 I don't know why you -- you're not following the rule at
6 this point in time, but, again, I'm an objecting party.
7 I am demanding that this deposition be suspended,
8 period.
9 MR. WOO: Let's go off the record.
10 THE VIDEOGRAPHER: Okay. We are going off the
11 record. The time is 15:47.
12 (A recess transpires.)
13 THE VIDEOGRAPHER: We are back on the record.
14 The time is 15:57.
15 BY MR. WOO:
16 Q. Mr. Crane, I would like to direct you -- I will
17 refer you back to Sony Exhibit 1004 in the IPR
18 proceeding for the IPR matter 2023-00996. And this is a
19 pleading that concerns US Patent No. 10,991,165. If I
20 refer to this proceeding as the '165 IPR, will you
21 understand what I mean?
22 **A. I will. I'm going to have to find that exhibit**
23 **here.**
24 Q. Actually, I will.
25 **A. Or you can bring -- you can bring it up.**

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1 Q. Okay. Let me do that.
2 Okay. I just put it into the system. Let me
3 know if you can access it, David.
4 THE REPORTER: Is this a previously marked
5 exhibit?
6 MR. SOROCCO: This was one of the exhibits from
7 Monday.
8 (Referencing Exhibit 1004 IPR '165.)
9 BY MR. WOO:
10 Q. Okay. And David, let me know when you're ready.
11 **A. All right. I have it.**
12 Q. Okay. Now, Counsel previously asked you if you
13 noticed any typographical errors in your declaration,
14 which is Exhibit 1004 for the '165 proceeding. Do you
15 recall that questioning?
16 **A. Yes.**
17 Q. And you testified that you believed that some of
18 the heading information in the table of contents was
19 wrong.
20 Do you recall that?
21 **A. Yes. In one of my declarations, there was --**
22 **the table of contents had an error.**
23 Q. All right. Yes. Thank you.
24 Can you please turn to page 54 of your
25 declaration, the one that you have open now?

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1 **A. I'm there.**
2 Q. Okay. At the top of the page 54, there's a
3 heading.
4 Do you see that?
5 **A. Yes.**
6 Q. That heading recites Ground 1: Claims 1, 3, 5,
7 7-12, and 23-26 are Obvious Over International
8 Publication, and I'll shorten it to Pisanich, in View of
9 the Knowledge of a POSITA.
10 Do you see that?
11 **A. I do.**
12 Q. And, now, counsel asked you if there was any
13 error in that heading.
14 Do you recall that?
15 **A. I'm not sure about that specific heading.**
16 Q. Okay. I will represent to you that he did ask
17 you that question. And you testified, and I quote:
18 "I would like to -- I would have to look and see
19 which claims exactly, to compare it, but I -- I don't
20 see anything wrong with that heading."
21 That appears at transcript -- the earlier
22 transcript 152 -- page 152, lines 21 through 23.
23 Anyway, in response to your answer regarding
24 whether the heading for ground 1 in your declaration,
25 which appears at the top of page 54, was correct,

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1 Counsel stated, and I quote:
2 "Okay. Yeah, I believe those -- those are the
3 correct claims, but we can check on that."
4 This appears at transcript 152, lines 24 through
5 25.
6 Do you recall that?
7 **A. Vaguely.**
8 Q. Okay. Let's check on the actual claims you
9 analyzed for ground 1, please.
10 So your analysis for ground 1 starts at page 54
11 and it goes through pages -- through page 91 of your
12 declaration, and your analysis is broken out by claims,
13 with the claim numbers identified in the headings.
14 Do you see that?
15 **A. Yes.**
16 Q. Could you just review your headings in your
17 analysis for ground 1, which goes from page 54 through
18 91 and make a note for yourself of what claims you
19 actually analyzed for ground 1? And let me know when
20 you're done.
21 **A. It looks like my analysis in ground 1 covers**
22 **claims 1, 3, 5 -- 1, 2, 3, 5, 6, 7, 8, 10, 11, 12, and**
23 **18.**
24 Q. Thank you, Mr. Crane. Now compare those claims
25 with the claims recited in the heading of page 54 of

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1 your declaration.
2 Now, the heading at the top of page 54
3 identifies claims 1, 3, 5, 7 through 12, and 23 through
4 26, correct?
5 **A. It does.**
6 Q. Now, I would like to ask you, do you think that
7 the heading at the top of the page 54 in your
8 declaration, which is Exhibit 1004 of the '165 IPR
9 proceeding is, correct?
10 **A. No. I think it should refer to these claims**
11 **that I just mentioned.**
12 Q. Thank you.
13 So there is a typographical error in the heading
14 of 4, correct?
15 **A. That would be my assumption.**
16 Q. So how should the heading at the top of page 54
17 in your declaration be revised to correct the
18 typographical error, Mr. Crane?
19 **A. Claims 1 through 3, 5 through 8, 10 through 12,**
20 **and 18.**
21 Q. Thank you.
22 Let's turn to the same document, page 59 of your
23 declaration. And let me know when you're there,
24 Mr. Crane.
25 **A. I am there.**

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1 Q. At the bottom of page 91, there's another
2 heading.
3 Do you see that?
4 **A. Page -- what page -- I went to page 59.**
5 Q. I'm -- I'm sorry. 91.
6 **A. Okay.**
7 Q. I apologize if I misspoke. Page 91.
8 **A. Okay. I'm there.**
9 Q. Okay. In the bottom of page 91, there is a --
10 another heading. Do you see that one?
11 **A. I do.**
12 Q. And that heading currently recites Ground 2:
13 Claims 1, 3, 5, 7 through 12 and 23 through 26 are
14 Obvious Over PSO Manual in View of the Knowledge of a
15 POSITA.
16 Do you see that?
17 **A. I do.**
18 Q. And counsel previously asked you if the
19 statement in the heading at the bottom of page 91 in
20 your declaration was correct, and this appeared at
21 transcript page 183, lines 22, through page 184,
22 line 14. Now, do you recall that question?
23 **A. Vaguely.**
24 Q. And, now, you testified, and I will represent to
25 you that you stated:

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1 I believe that is correct, at least I was
2 writing -- as -- as I was writing it. I was certain of
3 the facts. Do you really want me to go through, or I
4 guess we'll go through this and make sure that that's
5 true."
6 Do you recall that?
7 **A. Sure.**
8 Q. Okay. Let's check the actual claims you
9 analyzed for ground 2.
10 So your analysis for ground 2, similar to your
11 analysis for ground 1, you -- you break it out by claim
12 limitations and you have separate headings for each of
13 the claims that you cover.
14 Ground 2 analysis starts at page 91 and goes
15 through page 115 of your declaration. And if you could,
16 Mr. Crane, please review the headings in your analysis
17 for ground 2 and make a note for yourself which claims
18 you actually analyzed for ground 2, and then let me know
19 when you're done.
20 **A. Yeah, scanning all the way through to 115, it's**
21 **the same numbers.**
22 Q. Okay. And could you please state what numbers
23 those claims -- please state the number of the claims
24 that you actually analyzed for ground 2.
25 **A. Claims 1 through 3, 5 through 8, 10 through 12,**

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1 **and 18.**
2 Q. Now, turning back to the bottom of page 91 in
3 your declaration, is the heading at the bottom of
4 page 91 correct?
5 **A. No.**
6 Q. And why not?
7 **A. It should read claims 1 through 3, 5 through 8,**
8 **10 through 12, and 18.**
9 Q. Great. Thank you very much.
10 Please turn to page 35 of your declaration, same
11 document that you're on. Let me know when you're there.
12 **A. Okay. I'm at 35.**
13 Q. At page 35 of your declaration are two figures
14 reproduced from the prior art Pisanich reference.
15 Do you see that?
16 **A. Yes.**
17 Q. Counsel previously asked you to explain what you
18 understood Figure 1 of Pisanich to be describing or
19 showing.
20 Do you recall that?
21 **A. Vaguely.**
22 Q. There is a box in Figure 1 of Pisanich that is
23 labeled "Game 112."
24 Do you see that?
25 **A. Yes.**

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1 Q. Okay. You testified previously that game 112 in
2 Figure 1 of Pisanich could be a flight simulator --
3 flight simulator game.
4 Do you recall that?
5 **A. Yes.**
6 Q. There's another box in Figure 1 of Pisanich that
7 is labeled "Other Games 116."
8 Do you see that?
9 **A. I do.**
10 Q. You testified that examples of the other games
11 116 are, and I quote, car racing game or a football
12 game. Do you recall that?
13 **A. Yes.**
14 Q. Please turn to page 33 of your declaration,
15 which is Sony -- the same -- same document.
16 **A. Okay.**
17 Q. All right. At page 33, there are illustrations
18 for six versions of a flight simulator -- simulator
19 game.
20 Do you see that?
21 **A. Yes.**
22 Q. And one of the versions is labeled "Apple II
23 1984," and another version is labeled "TRS-80 1987."
24 Do you see that?
25 **A. Yes.**

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1 Q. You testified that the software that runs a
2 flight simulator on Apple II in 1984 and the software
3 that runs a flight simulator for the TRS-80 in 1987
4 would be, and I quote, different computer software
5 games.
6 Do you recall that?
7 **A. Yes.**
8 Q. So with that testimony in mind, please turn back
9 to page 35 of your declaration, which shows Figure 1 of
10 Pisanich.
11 **A. Okay.**
12 Q. In your opinion, would a POSITA looking at
13 Figure 1 of Pisanich understand that the other games 116
14 could be other versions of a flight simulator game?
15 **A. Could be.**
16 Q. Okay. If the other games 116 in Figure 1 at
17 Pisanich is some other version of a flight simulator
18 game, would you agree that a POSITA would understand the
19 game to have a flight simulator theme?
20 **A. Yes.**
21 Q. And if the game 112 in 1 of Pisanich is a flight
22 simulator game, would that game also have a flight
23 simulator theme?
24 **A. It would.**
25 Q. Would a POSITA understand that different

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1 versions of a flight simulator game each having a flight
2 simulator theme relate to the same virtual thematic
3 environment?
4 **A. They would relate to similar thematic**
5 **environments. I mean, it's -- the theme would be the**
6 **same.**
7 Q. Okay. I would like to switch over to the IPR
8 for the '028 patent. Okay?
9 So first counsel asked you whether you have an
10 understanding of how Shockwave operated.
11 Do you recall that?
12 **A. Vaguely.**
13 Q. And you testified that a web browser --
14 actually, I'll come back to that.
15 I would like to refer you to Sony Exhibit 1004
16 in the IPR proceeding IPR 2023-0094 (sic). This is the
17 proceeding that concerns the '028 patent. And if I
18 refer to this proceeding as the '028 IPR, will you
19 understand what I mean, David?
20 **A. Yes.**
21 MR. WOO: I'm going to introduce -- this is a
22 prior exhibit, for the record, that was introduced in
23 the Monday deposition, and I'm just going to make it
24 available in the -- for Mr. Crane, the witness, to see.
25 And I will put it up for everyone.

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1 I just entered it into the chat feature of the
2 Zoom meeting. Let me know when you are able to access
3 that, Mr. Crane.
4 THE DEPONENT: I have it.
5 BY MR. WOO:
6 Q. Okay. Please turn to page 33 of your
7 declaration, which is Exhibit 1004 from the '028 IPR.
8 Let me know when you're there.
9 **A. I have page 33.**
10 Q. At the -- at page 33, there's a Figure 9
11 reproduced from the prior art Angles reference.
12 Do you see that?
13 **A. Yes.**
14 Q. At the bottom of page 33 is a quote from Angles
15 that includes, quote:
16 "The content provider computer 14 can integrate
17 the customized advertisements 30 into offerings such as
18 online games, video programming, Internet radio, virtual
19 reality environments, and the like."
20 Do you see that?
21 **A. No.**
22 Q. Oh.
23 **A. Where are we?**
24 Q. I thought it would be page 33 of the...
25 **A. Is it IPR 954?**

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1 Q. My apologies if I gave you the wrong one. Hold
2 on. It should be 954 and -- one second here. I'm
3 sorry. That's -- it's actually on page 34. My
4 apologies. I misspoke.
5 The quote begins -- the quote from Angles begins
6 on the top of page -- I'm sorry.
7 The quote from Angles begins at the bottom of
8 page 33, and it goes on into the top of page 34.
9 **A. Starting with "the embodiment shown in Figure**
10 **9"?**
11 Q. Let's see?
12 **A. At the bottom of 33?**
13 Q. 33. The embodi -- exactly. "The embodiment
14 shown in Figure 9." Exactly.
15 **A. I have that on the screen.**
16 Q. Okay. So if you go to the very next page, and,
17 like, that continues a quote, and at the top of page 34
18 is the quote. It's about midway through the first line,
19 a little bit more than halfway through the first line.
20 It starts with the language, "The content provider
21 computer 14."
22 Do you see that?
23 **A. Yes.**
24 Q. Okay. And then that's quote -- the rest of the
25 quote I gave to you, which I'll repeat.

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1 "The content provider computer 14 can customize
2 advertisements 30 into offerings such as online games,
3 video programming, Internet radio, virtual reality
4 environments, and the like."
5 Do you see that?
6 **A. I do.**
7 Q. Would a POSITA reading Angles understand that
8 the only place where customized advertisements could be
9 integrated into an online game is at the content
10 provider computer?
11 **A. No.**
12 Q. And why not?
13 **A. If you are integrating customized advertisements**
14 **into virtual reality environments on billboards, for**
15 **example, that integration has to occur inside the game**
16 **code, which is on the client device, in order to change**
17 **its perspective to match the billboard as you're driving**
18 **around in a 3D world, for example.**
19 Q. Okay. So where does the integration actually
20 occur in that situation, Mr. Crane?
21 **A. That integration has to occur during game play**
22 **while it's executing.**
23 Q. Executing where?
24 **A. On the client device.**
25 Q. Okay. Is that the user computer?

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1 **A. Yes.**
2 Q. So just to confirm, would a POSITA reading
3 Angles understand that the customized advertisements
4 could be integrated into an online game at the consumer
5 computer shown in Figure 9 of Angles?
6 **A. That's where that would take place.**
7 Q. Okay. Thank you.
8 You testified earlier today -- I'm sorry.
9 You testified earlier on Monday that when
10 talking about a primary application and a secondary
11 application, that you were just using language from the
12 asserted patent. And this comes at transcript page 162,
13 lines 12 through 17. Do you recall that?
14 **A. Vaguely.**
15 Q. Okay. And you testified that, and I quote:
16 "In my opinion, it doesn't use the term very
17 well to a game developer. A game is an application, and
18 it might contain software layers inside or modules
19 inside, so one of the claim terms in the patent is
20 primary or secondary application inside a primary
21 application. A person of ordinary skill in the art
22 would find that hard to digest unless it's treated as a
23 software layer inside the game."
24 Do you recall that testimony?
25 **A. I do.**

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1 Q. Okay. Could you please elaborate on what you
2 meant by that, Mr. Crane?
3 A. Well, a person of ordinary skill in the art
4 making a video game would consider the game to be the
5 application, and any modules that happen to be inside
6 the game wouldn't use the term "application." It would
7 be, you know, confusing at best. Just it's not the
8 normal use of the term "application." The application
9 is that whole thing that you download.
10 Q. Okay. So in your declaration earlier, you
11 testified that you were responsible for a number of
12 published game titles. Does that sound familiar?
13 A. I certainly was.
14 Q. Yeah. And some of those game titles, or at
15 least one of those game titles, includes Pitfall, for
16 example. Does that ring a bell?
17 A. That's a true statement.
18 Q. Yeah. Would a POSITA consider Pitfall a game
19 application?
20 A. Yes.
21 Q. Would a POSITA think that a game application
22 like Pitfall would include secondary applications?
23 A. I don't see how.
24 Q. Okay. And why do you say that, Mr. Crane?
25 A. Again, the game is an application. It's run on

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1 a console.
2 Q. Okay. So for purposes of your declaration in
3 the '165 IPR proceeding, why did you say that a game
4 such as that disclosed in Pisanich was a primary --
5 primary application having a secondary application?
6 A. I would have to refer to that exact language.
7 Typically, as I stated, I take the claim terms in the
8 language of the patent and search the prior art for how
9 the understanding of a person of ordinary skill would
10 interpret that prior art. So I probably just used the
11 term of the patent.
12 Q. Okay. Earlier today in your testimony, you
13 talked about an inference being an inescapable logical
14 conclusion.
15 Do you recall that?
16 A. I do.
17 Q. Does an inference always mean an inescapable
18 logical conclusion to you?
19 A. Well, as I believe I said at that point, that's
20 what I meant by inference in that sentence. But I'm not
21 a dictionary. I don't know what the inference in every
22 connotation or every context is going to mean.
23 Q. When you testified earlier that based upon some
24 images from one of the prior art references, that there
25 was an inference that those images -- I'm sorry, those

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1 images were an inference or -- of a thematic publishing
2 logic module.
3 Did you recall that?
4 A. Not those exact words, but something along those
5 lines.
6 Q. Is there a situation in which just pictures or
7 images from game play would not indicate a thematic
8 publishing logic module?
9 A. I don't know offhand.
10 Q. If there was actually a thematic publishing
11 logic module inside a game, would you expect to see
12 source code for that?
13 A. I would love to see source code for it, but not
14 in an IPR proceeding.
15 Q. Okay. But if you actually had the source code
16 for a game, would you be able to look in the source code
17 and find a thematic publishing logic module, as best you
18 can understand it, for that claim term?
19 A. I certainly would.
20 Q. And if the source code did not have what you
21 would expect for a thematic publishing logic module, do
22 you think then that accused -- or that product would not
23 have a thematic publishing logic module?
24 Apologies if my question is confusing. Let me
25 withdraw that question and ask another one.

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1 If you -- if you had source code for a game and
2 you did not find source code for a thematic publishing
3 logic module, what would you conclude as to whether the
4 game had or did not have a thematic publishing logic
5 module?
6 A. Yeah, I don't know. I mean, I would have to
7 analyze the source code. It's -- it's too hypothetical
8 a question for me to answer as I sit here today.
9 Q. Okay.
10 MR. WOO: Let's go off the record for about ten
11 minutes, please.
12 THE VIDEOGRAPHER: We are going off the record.
13 The time is 16:23.
14 (A recess transpires.)
15 THE VIDEOGRAPHER: We are back on the record.
16 The time is 16:30.
17 MR. WOO: I will note for the record that the
18 earlier objection lodged by counsel with respect to the
19 declarations and the documents that Mr. Crane referred
20 to is an objection over evidence and, for the record,
21 Appendix D to the 2020 Consolidated Trial Practice Guide
22 provides that an objection at the time of examination,
23 whether to evidence, to a party's conduct, or to the
24 officer's qualifications, to the manner of taking the
25 testimony or any aspect of the testimony must be noted

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1 on the record, but the examination still proceeds.
2 Testimony is taken subject to any such objection.
3 That is our basis for continuing with the
4 examination of Mr. Crane with respect to the documents
5 that he reviewed as opened -- as the door was opened by
6 Mr. Sorocco's earlier question.
7 Mr. Sorocco, as we understand it, is relying on
8 another part of the Consolidated Trial Guide, which I
9 quote for the record, which is Point No. 9.
10 "At any time during the testimony, the test --
11 the witness or a party may move to terminate or limit
12 the testimony on the ground that is -- that it is being
13 conducted in bad faith or in a manner that unreasonably
14 annoys, embarrasses, or oppresses the witness or party.
15 The witness or party must promptly initiate a conference
16 call with the board to discuss the proposed motion.
17 "37 CFR section 42.20(b). If the objecting
18 party -- if the objecting witness or party so demands,
19 the testimony must be suspended for the time necessary
20 to obtain a ruling from the board, except as a board may
21 otherwise order."
22 With that said, there's nothing about the
23 exhibit, which is the declarations that Mr. Crane was
24 prepared to talk about, that unreasonably annoys,
25 embarrasses, or oppresses the witness or party. So

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1 therefore, Mr. Sorocco, Counsel's, objection and attempt
2 to terminate and end the testimony is improper.
3 With that, we would like to -- we plan to take
4 this up with the board tomorrow to seek the board's
5 guidance on that, and then after that, we expect the
6 board to give guidance and we will proceed accordingly.
7 We are done with our redirect.
8 MR. SOROCCO: Okay. Give me five minutes,
9 please.
10 THE VIDEOGRAPHER: Okay. And we are going off
11 the record. The time is 16:33.
12 (A recess transpires.)
13 THE VIDEOGRAPHER: We are back on the record.
14 The time is 16:41.
15 EXAMINATION
16 BY MR. SOROCCO:
17 Q. Okay, Mr. Crane. In Mr. Woo's redirect, he
18 asked you a question regarding -- and I'm going to be
19 referring to the '165 patent, so it would be your
20 Exhibit 1004 in the IPR 996.
21 Do you have that in front of you?
22 **A. Yes.**
23 Q. Okay. Mr. Woo asked you a question, and with
24 regard to page 35, I believe, of this declaration. And
25 it is with regard to, I believe, Figure 1 on the upper

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1 left-hand side. And his question to you is regarding
2 if -- that games 112 and other games 116. He asked you,
3 would a POSITA looking at Figure 1 of Pisanich
4 understand that the other games 116 could be other
5 versions of a flight simulator game.
6 Do you see that -- or do you recall that
7 testimony?
8 **A. Yes.**
9 Q. Or question?
10 And you answered, "Could be," correct?
11 **A. I believe so.**
12 Q. Okay. Can you turn to page 61 of your
13 declaration, please?
14 Are you there, sir?
15 **A. Not quite.**
16 **There we are.**
17 Q. Okay. If you look at that, Pisanich Figure 1
18 is, once again, reproduced there in the middle of the
19 page. Is that correct?
20 **A. Yes.**
21 Q. And this is in paragraph 130 of your
22 declaration, and it looks like you are block quoting
23 from Pisanich after that figure. And do you see that
24 language there in the block quote, Mr. Crane?
25 **A. I do.**

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1 Q. Okay. And the first sentence says:
2 "Moreover, a second player 124 may play an
3 entirely different game 116, for instance, a car racing
4 game or a football game."
5 Do you see that language --
6 **A. I do.**
7 Q. -- Mr. Crane?
8 **A. I do.**
9 Q. And isn't it true that a -- I believe Mr. Woo
10 asked you about different versions of the flight
11 simulator game with regard to this other games 116.
12 Isn't that correct?
13 **A. Was that (inaudible) question.**
14 Q. Yeah. I'm sorry.
15 Isn't it correct that -- is it -- is it correct
16 that Mr. Woo asked you with regard to other versions
17 of flight simulator -- if other versions of flight
18 simulator games could be other games 116 to a Pisanich?
19 Do you recall that testimony?
20 **A. Yes.**
21 Q. Or question?
22 Okay. Is it still your testimony that the other
23 games 116 could be other versions of flight simulator
24 games, given that Pisanich himself stated that it may --
25 a second player, 124, may play an entirely different

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1 game 116?
2 **A. "Pisanich certainly (inaudible).**
3 MR. WOO: Objection. Form.
4 THE DEPONENT: Oh. What?
5 MR. WOO: Objection. Form.
6 THE DEPONENT: Pisanich certainly explicitly
7 talks about how it may be a different game.
8 BY MR. SOROCCO:
9 Q. Sure?
10 **A. I was asked if the -- a person of ordinary skill**
11 **in the art looking at this would consider it might also**
12 **be another flight simulator.**
13 Q. Sure. But one of ordinary skill in the art,
14 sir, is going to look at what Pisanich --
15 (Simultaneous speakers.)
16 MR. WOO: Objection, Counsel.
17 MR. SOROCCO: -- correct?
18 MR. WOO: You didn't let the witness answer
19 completely. If you are planning on cutting him off,
20 that's objectionable.
21 MR. SOROCCO: Please go ahead.
22 I thought he was finished.
23 THE DEPONENT: What I said was, the
24 characterization of the question in redirect was whether
25 a person of ordinary skill in the art would consider

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1 that other games 116 might be another version of a
2 flight simulator, and I said, if for no other reason
3 that when you design a system like this, you don't
4 design it for a single player playing a single game.
5 Pisanich talks about how you've got multiple players,
6 other players, 124, playing games, and they're using the
7 same game data server and, you know, interfacing with
8 real world weather and all that sort of thing. So that
9 was what I answered.
10 BY MR. SOROCCO:
11 Q. Thank you. But again, the question was --
12 strike.
13 One of ordinary skill in the art would be
14 reviewing Pisanich based upon what Pisanich discloses,
15 correct?
16 **A. Yes.**
17 Q. Okay. And Pisanich discloses in this paragraph
18 block quoted at the bottom of page 61 that an entirely
19 different game 116, for instance, a car racing game or a
20 football game, may be played by a second player, 124,
21 correct?
22 **A. It says that a second player may play an**
23 **entirely different game.**
24 Q. I understand you want to stand on "may," but the
25 document speaks for itself.

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1 If we can go to yesterday -- or excuse me,
2 Monday, page 228 of your testimony. And I asked you,
3 referring specifically to Figure 9, where is the
4 electronic page and customized advertisement created in
5 Angles?
6 Do you remember that question?
7 **A. No.**
8 Q. Okay. Your answer was:
9 "The electronic page is created on the content
10 creator. The customized advertise is passed to the
11 content provider, and the combined data is sent down to
12 the consumer computer."
13 "12, correct," was my addition.
14 And you said, "Consumer computer 12. Thank
15 you."
16 Do you recall that testimony?
17 **A. Vaguely.**
18 Q. Okay. And is it -- if we bring up PTAB
19 Figure -- PTAB, your Exhibit 1004 and PTAB proceeding
20 ending in '954, Figure 9 on page 33. Can you let me
21 know when you're there, sir?
22 **A. I'm there.**
23 Q. Okay. So your testimony was that the electronic
24 page is created on the content creator, and we talked
25 about content creators and advertisement creators being

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1 those computers 14 and 18. Do you remember that
2 testimony from Monday, sir?
3 **A. From Figure 9, content provider computer is**
4 **number 14.**
5 Q. Okay?
6 **A. And the other content provider computer is 18.**
7 Q. Okay. So your testimony was:
8 The electronic pages created on the content
9 creator, the customized advertise is passed to the
10 content provider and the combined data is sent down to
11 the consumer computer."
12 You testified on redirect that the consumer
13 computer was combining the electronic page and
14 customized advertisement. Is that correct, sir?
15 **A. I don't believe I used the term "combining"**
16 **there.**
17 Q. Excuse me. Electronic -- or put together?
18 **A. Integrated maybe?**
19 Q. Combination, excuse me.
20 "The combination of the electronic page and
21 customized advertisement" --
22 MR. WOO: Objection.
23 BY MR. SOROCCO:
24 Q. -- would happen on the consumer computer 12.
25 Was that your -- do you recall that testimony,

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1 sir?
2 MR. WOO: Objection. Form. Mischaracterizes
3 the testimony.
4 THE DEPONENT: I don't see the testimony in
5 front of me that you're questioning. I believe I was
6 saying that the integration can happen at the consumer
7 computer.
8 BY MR. SOROCCO:
9 Q. Yes. You said that the integration -- or I
10 would assume it's combination, since that's the -- I
11 believe, the claim language, or the language in the
12 Angles, right? Yeah.
13 Incorporated, excuse me, is the language if we
14 look at the bottom of page 33.
15 "The embodiment shown in Figure 9 allows the
16 customized advertisements 30 to be incorporated directly
17 into the content provider's offerings."
18 So the customized advertisement is incorporated
19 with the electronic page at the content provider
20 computer 14. Isn't that correct?
21 MR. WOO: Objection. Form.
22 THE DEPONENT: I believe my testimony was that
23 the advertisement and the content are combined in the
24 content provider, delivered to the consumer computer.
25 In redirect, we were talking about what also happens in

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1 the consumer computer.
2 BY MR. SOROCCO:
3 Q. And if I go back to your testimony from Monday,
4 I asked the question, is reading from lines 38 through
5 42 of Angles, do you have an understanding of how the
6 customized advertisement is sent and is received by the
7 content provider computer 14 and sent along to the
8 consumer computer 12. Do you recall that question?
9 **A. Not specifically.**
10 Q. Okay. Your answer was:
11 "My understanding from reading this section is
12 that there is a customized advertisement that is
13 incorporated into content information which is then
14 forwarded to the user computer."
15 Do you recall that -- your testimony, sir?
16 **A. Yeah. That's my understanding.**
17 Q. Okay. And is it also -- that's fine.
18 MR. SOROCCO: I have no further questions.
19 MR. WOO: Okay. Are you done, Doug?
20 MR. SOROCCO: Yeah. No further questions.
21 MR. WOO: Okay. So for the record, I would like
22 to freeze the record as it is, and then I suggest would
23 go to the board tomorrow with the dispute over the
24 evidence that you contend, Doug, is not fairly in the
25 case and which we believe should be fairly allowed

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1 entered as appropriate evidence that was directly
2 initiated by your own questioning.
3 MR. SOROCCO: And as I discussed that I do not
4 agree with your characterization. That was a general
5 statement. That's like saying that a witness can create
6 their own document stating that they did not murder
7 their wife, and when they were asked what documents they
8 reviewed they could put in the statement as evidence for
9 the truth of the matter. It's -- it's absurd.
10 So we'll -- we'll talk to the board in the
11 morning, I guess.
12 MR. WOO: That's very good.
13 THE VIDEOGRAPHER: Okay. Then this will end the
14 deposition of David Crane for today. We are going off
15 the record. The time is 16:54.
16 THE REPORTER: Briefly, do both sides require
17 the rough draft?
18 MR. SOROCCO: Yes.
19 MR. WOO: Yes.
20 (Proceeding adjourns at 4:54 p.m.)
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1 REPORTER'S CERTIFICATE
2
3 STATE OF CALIFORNIA) ss.
4 I, DEREK L. HOAGLAND, CSR #13445, State of
5 California, do hereby certify:
6 That DAVID CRANE the witness whose
7 deposition is hereinbefore set forth, was duly sworn
8 by me before the commencement of such deposition and
9 that such deposition was taken before me and is a true
10 record of the testimony given by such witness.
11 I further certify that the adverse party,
12 PETITIONER, was represented by counsel at the deposition.
13 I further certify that the deposition of
14 DAVID CRANE, occurred virtually, via videoteleconference
15 on Thursday, February 29, 2024,, commencing at 10:59 a.m.
16 to 4:54 p.m.
17 I further certify that I am not related to
18 any of the parties to this action by blood or
19 marriage, I am not employed by or an attorney to any
20 of the parties to this action, and that I am in no way
21 interested, financially or otherwise, in the outcome
22 of this matter.
23
24
25

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1 IN WITNESS WHEREOF, I have hereunto set my
2 hand this 1st day of March, 2024.
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4 _____
5 DEREK L. HOAGLAND, CSR #13445
6 NOTARY PUBLIC IN AND FOR THE
7 CALIFORNIA
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