

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

-----X
TESLA, INC.,

Petitioner,

v.

AUTONOMOUS DEVICES, LLC,

Patent Owner.

-----X

Case No. IPR2023-01054
U.S. Patent No. 10,452,974

DEPOSITION

OF

JASON ANDRE JANET, PH.D.

WEDNESDAY, FEBRUARY 28, 2024

HELD REMOTELY

Reported by:
CANDIDA BORRIELLO
JOB NO. 6542274-001

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DATE: February 28, 2024
TIME: 10:01 a.m. (Eastern Time)

Deposition of JASON ANDRE JANET, held
REMOTELY, before Candida Borriello, Court
Reporter and Notary Public of the State of
New York.

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A P P E A R A N C E S:

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MCKOOL SMITH
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ALSO PRESENT:

ASHRAF FAWZY
In-House Counsel, Tesla

1 J. Janet

2 (Exhibit 1001, '974 Patent, was
3 introduced.)

4 (Exhibit 1002, Declaration of
5 Jason Janet, was introduced.)

6 (Exhibit 1004, Grotmol Reference,
7 was introduced.)

8 (Exhibit 1005, Hickman Reference,
9 was introduced.)

10 THE COURT REPORTER: We're on the
11 record.

12 J A S O N J A N E T,
13 called as a witness, having been
14 duly sworn by a Notary Public,
15 was examined and testified as
16 follows:

17 EXAMINATION BY

18 MR. JAIRAM:

19 Q. Good morning, Dr. Janet.

20 A. Good morning.

21 Q. Will you please state and spell
22 your full name for the record?

23 A. Yes, my name is Jason Andre Janet,
24 and it's spelled J-A-S-O-N, middle name
25 Andre, A-N-D-R-E, last name Janet, J-A-N-E-T.

1 J. Janet

2 Q. Dr. Janet, before we begin, I just
3 want to remind you of some basic ground
4 rules. You may already know this, but I'll
5 just repeat this for the sake of
6 completeness.

7 You understand you've been placed
8 under oath today?

9 A. Yes, I do.

10 Q. And you understand that you're
11 bound to answer my questions truthfully today
12 unless your counsel specifically instructs
13 you not to answer?

14 A. Yes, that's my understanding.

15 Q. If a question is unclear, please
16 let me know so that I may rephrase as
17 necessary, however, you do need to answer the
18 question, okay?

19 A. Yes.

20 Q. I will assume that you understood
21 my question unless you indicate that you did
22 not. Is that okay?

23 A. That's okay also, yeah.

24 Q. Because your testimony is being
25 transcribed by the court reporter, do you

1 J. Janet

2 understand that you need to answer my
3 questions verbally instead of with gestures?

4 A. Yes, I understand that.

5 Q. I'm gonna do my best and I would
6 ask that you do your best that we speak one
7 at a time to make the court reporter's life
8 easier.

9 Does that sound good?

10 A. That sounds good.

11 Q. In terms of breaks, we'll take
12 breaks during this deposition, but if you
13 need one at any time, please let me know. If
14 a question is pending, I'll request that you
15 answer the question before taking a break,
16 okay?

17 A. Okay.

18 Q. Any questions before we begin?

19 A. No, I don't think I have any
20 questions.

21 Q. Are you aware of any reason that
22 you are unable to answer my questions
23 truthfully today?

24 A. No, there's no reason.

25 Q. Are you taking any medications that

1 J. Janet

2 would prevent you from providing honest,
3 accurate and complete answers?

4 A. No.

5 Q. Do you have any health conditions
6 that would prevent you from providing honest,
7 accurate and complete answers?

8 A. No.

9 Q. Do you understand that you are not
10 to discuss the substance of your testimony
11 with counsel during breaks during the
12 deposition?

13 A. Yes, I understand that.

14 Q. Dr. Janet, is there anyone in the
15 room with you today?

16 A. No.

17 Q. Do you have any documents with you
18 in the room today apart from the four
19 documents that I have uploaded electronically
20 a few minutes ago and provided to you?

21 A. Just work-related documents.

22 Q. If you need to refer to any
23 documents other than the documents that I
24 have specifically uploaded for your access, I
25 would ask that you please let me know that

1 J. Janet

2 you are going to refer to it and let me know
3 what it is. Is that okay?

4 A. Yes, sir.

5 Q. I will be asking you questions
6 about IPR 2023-01054, which involves US
7 patent 10452974. For convenience, I'll refer
8 to that patent as the '974 patent and I'll
9 refer to the IPR as the '974 IPR or the '974
10 patent IPR. Is that okay?

11 A. That's okay.

12 Q. And Dr. Janet, you understand that
13 there is also another IPR involving a
14 different patent and you provided the same
15 declaration for both IPRs, correct?

16 A. I provided one declaration for both
17 of those IPRs, yes.

18 Q. Right. And today, I will be asking
19 you questions with respect to the '974 patent
20 in that declaration that you provided. If
21 you have any questions or do not understand
22 what patent or IPR is being referred to,
23 please let me know, okay?

24 A. Okay.

25 Q. Dr. Janet, have you been deposed

1 J. Janet

2 before?

3 A. Yes, I have.

4 Q. About how many times have you been
5 deposed before?

6 A. Well, dozens, plural. Maybe three
7 or four dozen times.

8 Q. So, I will skip some of the, I
9 guess, really basic ground rules regarding
10 depositions. But if you have questions about
11 what we are doing here, please let me know so
12 that you can answer every question completely
13 and truthfully. Is that okay?

14 A. Yes, sir.

15 Q. Do you understand that the '974
16 patent IPR is an IPR initiated by Tesla to
17 challenge the '974 patent, Dr. Janet?

18 A. Yes, that's my understanding.

19 Q. And you understand that Autonomous
20 Devices is the patent owner in this IPR?

21 A. That's my understanding as well.

22 Q. You have a copy of Exhibit 1002,
23 your declaration in the '974 IPR with you?

24 A. This is one of the documents that
25 you provided?

1 J. Janet

2 Q. Yes, I provided that in the chat
3 link. Do you have the Exhibit 1002?

4 A. Yes, I do.

5 Q. And does the Exhibit 1002 look to
6 be a complete copy of the declaration that
7 you submitted?

8 A. I am opening it right now.

9 (Document review.)

10 Yes.

11 Q. Did you write this declaration,
12 Exhibit 1002 in the '974 IPR?

13 A. Yes, sir.

14 Q. Are there any errors that you're
15 aware of in this Exhibit 1002 declaration?

16 A. There are occasional grammatical
17 errors, but I would say nothing substantive.

18 Q. Are there any errors you want to
19 state on the record in terms of any opinions
20 that you provided?

21 A. No, sir, the opinions are
22 consistent.

23 Q. And your declaration contains all
24 of your opinions with this IPR, correct?

25 A. It contains certainly the opinions

1 J. Janet

2 as of the writing, which have not changed,
3 additional evidence for those opinions
4 certainly has, I wouldn't say been brought to
5 light since the writing of that, just
6 recognized as being relevant.

7 Q. Without telling me the substance of
8 any communications you may have had with
9 counsel, what did you do to prepare for your
10 deposition today?

11 A. My preparation comprised reviewing
12 my declaration, the invalidating prior art,
13 Grotmol and Hickman, review of the '974
14 patent as well.

15 Q. And again, without telling me the
16 substance of any communications with counsel,
17 approximately how long did you prepare for
18 today's deposition?

19 A. Oh, I don't know. I mean, it's
20 certainly hours, plural, but I don't have an
21 accurate count for you.

22 Q. Have you read or seen any of the
23 legal briefs filed by the parties in this
24 IPR? I'm referring to documents such as the
25 petition, the preliminary response, the

1 J. Janet

2 institution decision; have you read any of
3 the legal papers in this IPR?

4 A. Yes.

5 Q. You've read the petition filed by
6 Tesla?

7 A. Yes, sir.

8 Q. And you've read the preliminary
9 response filed by patent owner?

10 A. Yes.

11 Q. What percentage of the time would
12 you say have you been retained by a patent
13 owner as compared to by an accused infringer
14 or --

15 A. Petitioner.

16 Q. Non-patent -- yeah, and -- by an
17 entity other than the patent owner?

18 A. Well, I would be guessing on that
19 because I don't really have an MO in that
20 regard. My guess is it's probably an even
21 split, but that would require reviewing the
22 cases that I've been on and doing the math on
23 that.

24 Q. Have you written technical papers
25 published in peer-reviewed journals or

1 J. Janet

2 conferences?

3 A. Yes.

4 Q. Approximately, how many technical
5 papers would you say that you have published
6 in peer-reviewed journals or conferences?

7 A. I think it's maybe 35, 40,
8 somewhere in that range.

9 Q. Have you written any technical
10 papers published in peer-reviewed journals or
11 conferences on the topic of autonomous
12 vehicles?

13 A. Yes.

14 Q. And have you written any technical
15 papers published in peer-reviewed journals or
16 conferences on the topic of learning in
17 autonomous vehicles?

18 A. Yes.

19 Q. And are all of these papers on the
20 topics of autonomous vehicles and learning in
21 autonomous vehicles listed in your CV?

22 A. I'm not sure if they're all listed.
23 I think that my CV, which is a bit of a
24 hybrid between a resumé and a CV, lists a
25 subset of my publications. And truth be

1 J. Janet

2 told, I don't know what was -- what's not on
3 that list.

4 Q. Did you get a chance to review your
5 CV before it was filed by Tesla in this IPR,
6 the '974 IPR?

7 A. Well, reviewed in the sense that
8 the information on there was accurate at the
9 time. I would say yes.

10 Q. Have you ever personally
11 implemented or worked an autonomous vehicle
12 system?

13 A. Yes.

14 Q. Can you briefly describe the work
15 or experience that you had working on an
16 autonomous vehicle system?

17 A. That's a very long list. My
18 involvement with autonomous vehicles dates
19 back to, to start, probably in 1992 and I
20 worked on initially during that time ground
21 vehicles. For example, the Cybermotion K2A,
22 not long after that the Nomad 200, TRC or
23 transition -- can't remember what that stands
24 for, but the Health Mate and a variety of
25 special purpose built mobile robots and

1 J. Janet

2 endowing them with autonomy by bringing
3 together perception and means to interpret
4 what's perceived, process that information on
5 the basis of, let's just say, circumstance or
6 goals and unexpected events and a variety of
7 other things, given it the ability to do
8 motion planning, self-referencing, reactive
9 navigation.

10 And up through my dissertation, you
11 know, this period spans the mid to late '90s,
12 early to mid to late '90s, my dissertation
13 involved endowing different mobile robots
14 with the ability to learn the environment
15 that they are in for purposes of recognition
16 and fulfilling tasks, motion planning and
17 then share that knowledge with other mobile
18 robots, including mobile robots that aren't
19 configured the same way, they have different
20 sensor suites, different processing
21 capabilities and different drive trains.
22 Giving them the ability to share knowledge
23 with each other, whether it's used at face
24 value or whether it is tuned and propagated
25 back to enhance the broader knowledge of the

1 J. Janet

2 fleet of the robots. And that's in my

3 dissertation and at least some of the

4 publications that you had asked about.

5 Subsequent to that, my career has

6 been blessed with a -- with a very diverse

7 career, but just focusing on the autonomous

8 mobile robots, went from the ground domain

9 into the underwater domain and in the -- into

10 the air domain with different mobile robots.

11 You may notice from my resumé different

12 experiences, for example, with a company

13 called Nekton that later became iRobot. We

14 focused on submersibles that would go down

15 several kilometers into the water and perform

16 a variety of different tasks, enemy diver

17 intercept, countermine, anti-submarine

18 warfare, environmental monitoring. And then

19 wall climbing robots that -- that would

20 maneuver -- this was just before -- when I

21 say just before, it was probably about ten

22 years before drones became more ubiquitous,

23 but mobile robots that climbed walls and

24 ceilings that was under a Darpa initiative

25 initially and I commercialized that under a

1 J. Janet

2 company that was spun out of avionic
3 instruments or Transdigm called Vortex HC.

4 Won a couple of international
5 competitions in the underwater and wall
6 climbing space for autonomous mobile robots,
7 both as an adjunct professor at Duke
8 University and at NC State, but also in
9 industry. And really just kind of snowballed
10 from there.

11 For me to provide you an exhaustive
12 list of autonomous mobile robots would be
13 next to impossible.

14 More recently, my company applied
15 research associates. We have robots that
16 function autonomously in mines and hostile,
17 you know, combat theater type of
18 environments. Again, across multiple
19 domains. When I was at Teledigm, multi
20 domain autonomous mobile robots to include
21 vehicles that would fly for extended periods
22 of time over the water, land on the water,
23 dive under the water, perceive this was
24 primarily focused on anti-submarine warfare,
25 come back up, report, reposition to overcome

1 J. Janet

2 drift. I think that one was called Eagle Ray
3 or Angel -- Angel Fish, I can't remember what
4 we called it exactly at the time now, it's
5 been a while.

6 Anyway, I'm sure I'm leaving a lot
7 off.

8 Q. No, thank you and that's -- I'm
9 sure you have done several things and I
10 appreciate your summary.

11 And I want to ask you about a
12 couple of things that you mentioned. You
13 mentioned that you worked with research
14 associates.

15 Are you referring to research
16 associates in your lab or in your company or
17 in some other context?

18 A. The company I'm with is called
19 Applied Research Associates and we're about
20 a 2,000 employee company, due north of half
21 a billion a year, I think we did about
22 600 million last year.

23 Q. Okay. And have you ever been a
24 full-time professor?

25 A. Not full-time, no.

1 J. Janet

2 Q. Have you been a part-time
3 professor?

4 A. Yes, I've been an adjunct professor
5 at Duke and at North Carolina State
6 University, I think in excess of 20 years
7 each, 22, 23 years each. I've also guest
8 lectured at several other places, Naval
9 Postgraduate School multiple times, Georgia
10 Tech.

11 Q. Do you --

12 A. There are probably more.

13 Q. Thank you.

14 Do you do research in the context
15 of your adjunct professor roles that you
16 mentioned?

17 A. The adjunct professor roles entail
18 some research, but it's really more practical
19 or as part of teaching. I do have, with the
20 companies I've either founded, led or managed
21 in some way, shape or form, we collaborate
22 different universities, Duke, NC State,
23 University of North Carolina, Chapel Hill and
24 other universities. And so, to the extent
25 that I'm involved with research at those

1 J. Janet

2 universities and still an adjunct, it's more
3 in the capacity of me being an industry and
4 working with the more academic personnel at
5 these institutions. So, a collaborative
6 effort, if you will.

7 Q. Have you supervised any students in
8 the context of your adjunct professorial
9 roles?

10 A. Yes, I have.

11 Q. Are these graduate students that
12 you are referring to?

13 A. Undergraduate and graduate.

14 Q. Have you supervised any graduate
15 students to receive a Ph.D. a doctoral
16 degree?

17 A. Yes.

18 Q. And have you supervised students
19 for the doctoral degree in the area of
20 autonomous vehicles?

21 A. Yes.

22 Q. Have any of your students that you
23 supervised gone on to work for Tesla?

24 A. Not that I'm aware of.

25 Q. Have any of your students that you

1 J. Janet

2 have worked with -- strike, I'll withdraw
3 that question.

4 Before you work, before your
5 present work for Tesla in relation to the
6 '974 IPR and the other IPRs also against
7 autonomous device patents, had you ever been
8 retained by Tesla in any capacity?

9 A. No.

10 Q. You had not previously been
11 retained by Tesla as a litigation consultant?

12 A. Aside from these IPRs, I'm not sure
13 if I've -- I think I've been retained on a
14 matter related to these IPRs, so collectively
15 it would -- to me I'm putting them together,
16 but nothing prior to that.

17 Q. Aside from whatever monetary
18 compensation you may be receiving from Tesla
19 in the '974 patent IPR or other IPR's against
20 Autonomous Device patents or any other
21 present litigation against Autonomous
22 Devices, have you ever received any monetary
23 payments from Tesla in the past?

24 A. No.

25 Q. You have not had any research

1 J. Janet

2 sponsored by Tesla previously?

3 A. No.

4 Q. Dr. Janet, do you have a typical
5 process that you follow when drafting an IPR
6 declaration in terms of what parts of it you
7 write and what parts of it you rely more on
8 counsel for?

9 A. I don't know if I have a standard.
10 The way that these normally work out is I
11 review the patents that have either been
12 petitioned or might be petitioned, I review
13 the prior art that I can find in my own
14 search, I use software tools like PatSeer and
15 of course Google Patents. There are a couple
16 of others. Patsnap. And then I'll review
17 any prior art that counsel might come up
18 with, which might or might not be different
19 from what I found on my end. And I will
20 usually build out a claim chart where I go,
21 as you know, element by element, claim by
22 claim down the first column, and then I will
23 look at candidate invalidating prior art and
24 make comparisons to see if either in the
25 disclosure or in the claims there is a match

1 J. Janet

2 between those elements.

3 I'll, you know, it's entirely
4 possible there are things that I don't
5 understand. So, at a minimum at this point,
6 I'm asking counsel for information perhaps on
7 legal standards or disclosure or how to
8 interpret certain terms or how to interpret
9 the structure of the sentences. And then I
10 will -- there probably will be some pruning
11 at that point, so this table gets quite large
12 and then it gets smaller.

13 And, you know, from that table and
14 then just some general, I'll work up a
15 background section oftentimes and of course
16 provide my, you know, the known formatting
17 what I understand is the legal standards and
18 what have you and I'll put together a draft
19 and share that with counsel. And sometimes
20 the order here gets a little muddled, there's
21 oftentimes a lot of overlap.

22 Then conversations will take place
23 where we'll try to arrive at an understanding
24 of, A) how to interpret what's written, how
25 to interpret the structure of what's written

1 J. Janet

2 and, you know, means plus function,
3 questionable construction on terms, on and
4 on.

5 And it's a highly iterative process
6 after that, okay, well, this claim element is
7 met by what appeared to be the best
8 candidates for invalidating prior art or it's
9 not. And so, they'll be drafts and edits,
10 more drafts and more edits. And that's --
11 that's the process that seems to be something
12 I've evolved into.

13 Q. You mentioned sometimes you find
14 prior art in your own search; is that
15 correct?

16 A. Yes, sir.

17 Q. Regarding the Grotmol and Hickman
18 references at issue in the present IPR, are
19 those -- are either of those prior art
20 references that you found by your own search?

21 A. I'm having a hard time remembering
22 that. I think one of those I found -- I
23 probably had a good dozen or more. The one I
24 cannot -- the thing I cannot remember is
25 which one, whether it was Hickman or Grotmol

1 J. Janet

2 that I found in my end search. I think it
3 was Grotmol.

4 Q. In your work at ARA, ARA is the
5 company you work at or the acronym for that
6 company; is that right?

7 A. That's correct, yes, sir.

8 Q. In your work at ARA, part of what
9 you do is you review portfolios of other
10 people's IP; is that correct?

11 A. Yeah, that's not a major part. But
12 when you say other people's IP...

13 Q. Part of what you do is you review
14 IP portfolios; is that correct?

15 A. I do review IP portfolios, that's
16 correct, and I'm primarily focused on our
17 end, but yes.

18 Q. Do you develop any of your own IP,
19 intellectual property at ARA?

20 A. I do.

21 Q. Do you work in patent monetization
22 at ARA?

23 A. I'm not sure if it's the same way
24 that you would describe it. My function at
25 ARA, among other things, initially a CTO and

1 J. Janet
2 then the corporate director, is to evaluate
3 concepts and -- initially, and different
4 offerings that we have that arise from just
5 the fact that we have such a talent pool of
6 innovators. But we also do a lot of work for
7 the Department of Defense, intelligence
8 community, municipalities and private sector
9 organizations, and inevitably ideas come up
10 where either we're aware of a customer need
11 or we -- just the preferred approach is to
12 have the customer need first. But oftentimes
13 we end up discovering something and we don't
14 quite know where it can be applied.

15 So, I will review these, I'll have
16 to do a deep dive on each of them and I'll
17 take a look at the intellectual property
18 landscape, the business opportunity as best
19 as I can based on the circumstances and
20 information I would have at that point. And
21 then I oversee what's, I guess,
22 euphemistically a five-step process where
23 these concepts will evolve from early stage
24 evaluation of both the technical merits and
25 the business development or marketing merits

1 J. Janet

2 to validation to prototyping, beta testing,
3 open market and then growth. And I will make
4 investments on behalf of the company. Some
5 investments are quite large, in which case
6 I'm not the sole decision-maker, I will
7 involve, you know, executive management and
8 sometimes the board before making these
9 investments. And then do everything I can
10 based on my experiences as both the
11 technologist and an entrepreneur to nurture
12 these through their growth cycle.

13 Q. Okay. What is your present title,
14 job title?

15 A. Well, it's corporate director of IP
16 to P, intellectual property to products.

17 Q. Are you currently a professor?

18 A. No, I stepped away, I think in 2022
19 perhaps. I think I'm still listed as an
20 adjunct professor at North Carolina State
21 University, but I really haven't taught there
22 in a while.

23 Q. Is it fair to say that you are a
24 technology executive?

25 A. I think that would be fair to say,

1 J. Janet

2 yes, sir.

3 Q. Dr. Janet, have your -- have any of
4 your opinions ever been excluded in a court
5 proceeding?

6 A. Not that I'm aware of.

7 Q. So, we mentioned briefly the
8 Grotmol and Hickman references. I'm going to
9 ask you some questions about these
10 references. Let's start with Grotmol.

11 Grotmol is Exhibit 1004 in the '974
12 IPR.

13 Do you have a copy of Grotmol with
14 you?

15 A. What was the number on that one
16 again?

17 Q. Grotmol is Exhibit 1004.

18 A. Yes, let me open that. Okay, I
19 have it open.

20 Q. Can you please turn to Figure 2 of
21 Grotmol?

22 A. Okay.

23 Q. Can you previously describe what is
24 going on in Figure 2? And I understand that,
25 you know, you've written about Grotmol in

1 J. Janet

2 your declaration and I'm just asking for you
3 to just kind of previously describe it, I'm
4 not asking for saying, like, repeating
5 everything that's in your declaration.

6 Are you able to just briefly
7 describe Figure 2 of Grotmol, please?

8 A. Well, let me --

9 MR. COLVIN: Sorry. Objection.
10 Vague.

11 Q. I'll rephrase. Can you briefly
12 describe Figure 2 of Grotmol?

13 A. I can. Let me get a little context
14 just to make sure I don't go off the range.
15 So, I'm gonna basically stick with Grotmol's
16 interpretation or description here.

17 So, Grotmol describes this as a
18 functional block diagram illustrating
19 persistent switching according to some
20 implementations, according to one or more
21 implementations and --

22 Q. I understand, sir, that that's the
23 text verbatim from the specification of
24 Grotmol. I'm just asking you if you can tell
25 me what's going on in Figure 2 at a high

1 J. Janet

2 level?

3 A. So, there are descriptions of
4 Figure 2 in Column 10, and I'll do my best to
5 make sure I don't go off the range here and
6 at the same time, you know, I guess not read
7 for you what you can read as well.

8 So, Grotmol sets the stage for
9 Figure 2 by describing it as, you know, a
10 system that can switch between tasks based on
11 sensory context and this can be done all
12 while the training of a human operator. The
13 diagram shows a predictor which assigns
14 priorities to the available tasks and it does
15 that on the basis of what it perceives,
16 referring to a sensory context. The
17 priorities, which are, you know, the cues of
18 those priorities are taken often by training
19 by the user through a corrector and combiner
20 scheme and at least using the verbiage of
21 Grotmol and the -- what's predicted as
22 priorities can be filtered by this, among
23 other things, this persistent winner take all
24 module that only switches to different tasks
25 if the priority crosses a certain threshold.

1 J. Janet

2 And so, you know, tasks may include
3 continuing the drive at the same velocity and
4 direction, and/or hitting the brakes, hitting
5 the brakes aggressively, turning, turning by
6 a certain amount.

7 Grotmol goes on to explain that
8 that the task selector receives this sensor
9 based information. Grotmol leans heavily on
10 cameras, although certainly other sensors are
11 entertained and the images with their own
12 content and, you know, in -- in context, I
13 should say, and what's perceived of the
14 internal state of the system, system history.
15 A lot of this kind of fits into your standard
16 control schemes where you might have, you
17 know, your history would be an integral
18 aspect, how things are changing might be a
19 derivative aspect, the severity of what
20 you're encountering, or the gravity of what
21 you're encountering may like be a
22 proportional aspect. And, you know, leaning
23 on the user, whether on board or remote will
24 provide a choice on what instruction sets to
25 employ or anticipate.

1 J. Janet

2 Q. When you say instruction sets in
3 Figure 2, do we see any instructions at any
4 part of this figure or are you referring to
5 something else?

6 A. So, instructions would include,
7 like a task, for example.

8 Q. Is the task selection at the bottom
9 right of Figure 2 what you mean by a task?

10 A. If I'm remembering correctly, I
11 believe so.

12 Q. So, if I'm understanding your
13 testimony, the result of Figure 2 is to pick
14 a task, and you're saying that that is an
15 instruction?

16 A. That's the equivalent of an
17 instruction set, you know. So, it's like it
18 could be a reactive task, turn left, turn
19 left 15 degrees, hit the brakes, do a U-turn,
20 slow down. Those are instruction sets.

21 Q. I see that there is a user
22 correction at the top right of Figure 2.

23 Can you briefly describe, what's --
24 what is this user correction?

25 A. Well, the -- in the context of

1 J. Janet

2 Figure 2 and I might be a little sketchy on
3 this, but a user is somehow in the loop, if
4 I'm not mistaken, and providing some guidance
5 on the basis of what is perceived and the,
6 you know, and the context of what's perceived
7 and that is what is being, you know, listened
8 to, if you will. Again, if I'm remembering
9 correctly.

10 Q. Do you rely on your declaration on
11 Figure 2?

12 A. I don't know if I cited it exactly
13 but it was certainly part of what was read.

14 Q. Are there any other disclosures,
15 either in the form of figures or text
16 disclosures in Grotmol regarding task
17 selection that are different from the
18 approach shown in Figure 2?

19 A. I would have to go back and get
20 reacquainted. When you were asking that
21 question, I was looking through my report. I
22 know I at least cited it a few times in my
23 report directly as Figure 2.

24 Q. Yes, I'm now interested in whether
25 you cited any other different disclosures of

1 J. Janet

2 Grotmol regarding selecting a task, different
3 than Figure 2 that is?

4 A. I'm reasonably sure I do.

5 Q. Can could you point me to an
6 example perhaps in the content of a specific
7 location of Grotmol or a specific location in
8 your declaration?

9 A. Well, this is probably not
10 exhaustive, this is a -- how many pages is
11 this report, 225 pages. But, you know,
12 references made to, among other things,
13 the figure just above Figure 2, which is
14 Figure 1, and that is, if I'm remembering
15 correctly about how I referenced it,
16 describing the scene interpretation in the
17 context. Figures 4A and 4B I believe I used
18 as well. Figure 8 for sure. Figure 7, I
19 don't know if I exactly cited it, but that
20 shows where there could be communications to
21 a variety of different modalities, WiFi
22 internet or Ethernet, et cetera, and
23 leveraging servers. Figure 9, I believe.
24 And again, I'm going from memory.

25 I defer to my report in all of

1 J. Janet

2 this, of course, my responses, but --

3 Figure 20 -- I'm sorry. Figure 15. I

4 believe, Figure 11, Figures 11. Figures 18

5 and 19 if I'm not mistaken. 20B for context

6 and showing how shifting, for example, can

7 adjust -- can dictate the instruction set,

8 you know, what to avoid, and perhaps how to

9 turn, et cetera.

10 So, there may be other figures that

11 I referred to. But, you know, just off the

12 top of my head those are the ones that come

13 to mind.

14 Q. And do all of the disclosures of

15 Grotmol that you just now mentioned involve

16 analyzing an image in order to select a task?

17 A. I don't know if they are restricted

18 to images. If I'm not mistaken, Grotmol

19 leans heavily on images, but includes other

20 types of input data.

21 Q. Did you cite in your declaration to

22 any portion of Grotmol that involves not

23 analyzing images, but rather analyzing

24 something else?

25 A. You know, I can certainly review

1 J. Janet

2 that to give you a firm answer. I would say
3 that I defer to whatever is in my report and
4 perhaps more directly. You know, if there's
5 something specific in my report you want to
6 ask me about regarding something that I cite
7 to, I'm happy to visit that.

8 You know, it's interesting because
9 in answer to your question, among other
10 things, if I'm remembering the context here
11 properly, for example, on Paragraph 77
12 sensory input comprising a sequence of video
13 frames, inertial measurement units, motor
14 actuator feedback.

15 So, those are just a few sensors in
16 addition to images that are described in just
17 in this one area, there are most likely
18 others, if I'm not mistaken. And I might be
19 mixing things, but I believe that Grotmol
20 entertained audio or, you know, and disclosed
21 the utility of audio as well.

22 Q. Can you please turn to Column 33 of
23 Grotmol?

24 A. Okay.

25 Q. You see Line 30, the sentence that

1 J. Janet

2 begins with, "In some implementations"?

3 A. Yes.

4 Q. Can you please read that sentence
5 aloud?

6 A. In some implementations, the
7 trained configuration may be loaded to one or
8 more other robots in order to provide learned
9 behaviors.

10 Q. So, that sentence is describing
11 loading a trained configuration into another
12 robot, correct?

13 A. The trained configuration may be
14 loaded into one or more other robots to
15 provide learned behaviors, whether they're a
16 priori learned or whether they are learned
17 and refined subsequent to that.

18 Q. And that sentence of Grotmol that
19 you just read aloud does not describe
20 correlations between instruction sets and
21 images that are learned in one learning
22 process with one user and then being used to
23 operate another robot, correct?

24 MR. COLVIN: Objection. Vague.

25 A. After a little while it was hard to

1 J. Janet

2 follow your question.

3 Q. Okay. Let's parse that sentence
4 that you read aloud. The steps that you read
5 mentions the trained configuration.

6 What is the trained configuration?

7 A. Well, my understanding and a person
8 of ordinary skill in the art would understand
9 this to be a configuration where you have a
10 circumstance representation and a correlated
11 instruction set, just to put it in terms of
12 the '974.

13 Q. What are you pointing to in Grotmol
14 as what you just now mentioned as a
15 circumstance representation?

16 A. Well, a variety of things that are
17 cited in my report. So, let me go to the
18 report so we can get a little better
19 calibrated here, some better references.

20 So, for example, Paragraph 94,
21 Grotmol describes that training sets and
22 training configurations, which include
23 pictures and associated instruction sets for
24 operating the first device, can be stored or
25 saved and then loaded into the robot to

1 J. Janet

2 provide the trained behavior.

3 Q. So, I see that you are apparently
4 referring to Limitation 4.3 of Claim 4 of the
5 '974 patent; is that correct?

6 A. In paragraph 94 I am. We can visit
7 other parts to discuss training.

8 Q. I'm just trying to understand what
9 section of your declaration and -- you were
10 referring to and what claim that was in the
11 context of.

12 Paragraph 94 is regarding
13 Limitation 4.3 of Claim 4; is that correct?

14 A. That's what I just read you from,
15 that was a bit random to pick that, but...

16 Q. Let's talk about that portion of
17 your declaration.

18 A. Okay, let me go back there. Where
19 were we, 4.3?

20 Q. Yes, sir.

21 A. Okay.

22 Q. You were referring to Paragraph 94
23 of your declaration, and I do see that in
24 that paragraph you cited the sentence that I
25 mentioned.

1 J. Janet

2 A. Right.

3 Q. So, I'm just trying to understand
4 what your opinions are regarding this
5 paragraph.

6 Limitation 4.3 mentions a fourth
7 circumstance representation, right?

8 A. Yes, sir.

9 Q. And earlier in the claims,
10 including claim 1, which is the parent claim
11 of claim 4 or the base claim of claim 4,
12 there is mention of a first circumstance
13 representation, right?

14 A. Yes, sir.

15 Q. So, what specifically are you
16 mapping to the claimed first circumstance
17 representation? What part of Grotmol are you
18 mapping to the first circumstance
19 representation mentioned in claim 1?

20 A. Let me go back to claim 1 here.

21 So, first of all, you're referring
22 specifically to the term circumstance
23 representation. Do I understand that right,
24 Counselor?

25 Q. Yes, sir. And just to speed things

1 J. Janet

2 up, I'll just refer you to Paragraph 69 and
3 70 of your declaration, which is where I
4 think you are describing the circumstance
5 representation.

6 A. Thank you. I guess before I get to
7 that, obviously it's a broad term, but it's
8 definitely narrowed by the '974 patent and
9 satisfied by sequence of images.

10 And I'm sorry, you were referring
11 me to Paragraph 69; is that correct?

12 Q. We can look at Paragraph 69, 70 or
13 any other place that you think would be --

14 A. Yes.

15 Q. -- useful to talk about as --

16 A. Sure.

17 Q. -- as I'm trying to understand your
18 opinions regarding your mapping.

19 Can you tell me what disclosure or
20 thing in Grotmol you are mapping to the first
21 circumstance representation?

22 A. Well, as I say in Paragraph 69,
23 '974 patent specification does not define the
24 term, quote/unquote, circumstance
25 representation, but instead defines a

1 J. Janet

2 collection of object representations.

3 And then further down in

4 Paragraph 70, I say that:

5 A person of ordinary skill in the
6 art would further understand the circumstance
7 representations, quote/unquote, of the '974
8 patent to comprise the images from Grotmol
9 due to additional similarities.

10 Q. So, you were not saying that you do
11 not understand what the circumstance
12 representation of the '974 patent is,
13 correct?

14 A. I'm not saying that I do not
15 understand it, no.

16 Q. And you did map the claimed
17 circumstance representation to an image from
18 Grotmol, correct?

19 A. Correct.

20 Q. And you did not map the
21 circumstance representation that is claimed
22 in claim 1 to anything other than an image,
23 correct?

24 A. I don't believe I would go that far
25 to say that it's exclusively images, even per

1 J. Janet

2 Grotmol for a variety of reasons. So, I --
3 hopefully I at least answered your question
4 at a minimum there.

5 Q. Well, is there any place in your
6 declaration that you map the circumstance
7 representation of claims of the '974 patent
8 to anything other than an image in Grotmol?

9 A. I would have to look to be sure.

10 Q. Okay. If you want to --

11 A. All I know is that -- go ahead.
12 I'm sorry.

13 Q. No, I'm sorry. I didn't mean to
14 interrupt. Please continue.

15 A. Likewise.

16 All I know is that a person of
17 ordinary skill would know that it's not
18 limited to images.

19 Q. Okay. If you want to take just a
20 minute to look at your declaration and just
21 let me know if you mapped the circumstance
22 representation -- the first circumstance
23 representation of claim 1 to anything other
24 than an image, please do look at that and can
25 you let me know?

1 J. Janet

2 A. Sure. You know, as I mentioned,
3 Paragraph 77, the sensory input can include
4 video frames, but also inertial moment -- I'm
5 sorry, inertial motion measurement, motor
6 actuator feedback. Those are in this
7 declaration.

8 Q. I'm sorry, what paragraph are you
9 referring to, please?

10 A. Paragraph 77.

11 Q. Okay. I see at the bottom of
12 Paragraph 77 on page 48 you mention inertial
13 motion measurement.

14 Are you mapping the circumstance
15 representation to the inertial motion
16 measurement?

17 A. When I refer to techniques that
18 Grotmol employs, well known techniques that
19 include K-nearest neighbors and others.
20 They -- a person of ordinary skill would
21 understand that those include data from
22 different modalities and even if I'm
23 remembering correctly, Grotmol describes the
24 distributions related to, let's just say,
25 particle filters as heterogenous multi-modal,

1 J. Janet

2 meaning that they're -- they don't
3 exclusively come from one sensor, they don't
4 exclusively come from one robot, they don't
5 exclusively come from one teacher, user or
6 operator.

7 Q. Okay.

8 A. Yeah. Go ahead, I'm sorry.

9 Q. Okay. I'm just trying to
10 understand your claim mappings to prior art.

11 So, in your opinions provided in
12 your declaration, are you at anyplace in your
13 declaration mapping the inertial motion
14 measurement to the claimed circumstance
15 representation, whether it's the first
16 circumstance representation or the second
17 circumstance representation and so forth?

18 A. Specific to the -- the circumstance
19 representations, I used Grotmol's images as
20 examples. However, in reference to Grotmol
21 use of K-nearest neighbors and particle
22 filtering, I feel it's important to point out
23 that there is a mapping that may not be
24 obvious to -- if somebody was to just focus
25 on, you know, the higher level discussion of

1 J. Janet

2 Grotmol that would include these other sensor
3 values.

4 Q. Okay. For the context of claim 1
5 of the '974 patent, are you only -- in your
6 declaration, are you only mapping the first
7 circumstance representation to an image of
8 Grotmol? Yes or no, please.

9 A. I would like to give you a yes or
10 no answer. I understand why you're asking
11 that question and why you think it's strictly
12 limited to images. It focuses primarily on
13 images because that's the most readymade
14 example of the circumstance representation.
15 But where I can't quite cross into the yes
16 realm entirely is I have to acknowledge that
17 there's discussion in my report of the use of
18 particle filtering and K-nearest neighbors
19 and then acknowledgment that in my discussion
20 about claim 1, Paragraph 77 as an example
21 that, yes, there are video frames, but
22 there's also IMU, or inertial motion of
23 measurement units or motion measurement
24 actuator feedback and the like.

25 Q. Okay. If we could go back to

1 J. Janet

2 Limitation 4.3, I believe you mentioned a few
3 minutes ago. If we could please go back to
4 Paragraph 94 of your declaration, please,
5 which is what you pointed to. Can you please
6 do that?

7 A. Yes, I'm at Paragraph 94.

8 Q. Okay. And you see at the section
9 heading preceding Paragraph 93 that
10 Limitation 4.3 is written out?

11 A. Yes, sir.

12 Q. There are several parts of this
13 limitation and I'll try to ask about them in
14 an understandable way.

15 So, Limitation 4.3 partly requires
16 a fourth correlation, right?

17 Do you see that?

18 A. At the end, obtaining or receiving
19 the fourth one or more instruction sets for
20 operating the second device, you're referring
21 to that?

22 Q. Yeah, I think it's mentioned near
23 the start of the limitation, it says:

24 The knowledge base further includes
25 a fourth correlation.

1 J. Janet

2 Do you see that?

3 A. Yes.

4 Q. And do you --

5 A. Starting at the beginning you're
6 referring to?

7 Q. Yes, sir.

8 A. Yes.

9 Q. And the fourth correlation
10 including a fourth circumstance
11 representation correlated with a fourth one
12 or more instruction sets for operating the
13 second device.

14 Do you see that?

15 A. Yes.

16 Q. And in your declaration, you
17 provided mappings regarding all of the claim
18 terms to disclosures in Grotmol or whatever
19 other prior art reference is applicable for a
20 given claim, correct?

21 A. Yes, sir.

22 Q. So, for Limitation 4.3, what is the
23 fourth correlation being mapped to, in your
24 declaration, what is it being mapped to in
25 Grotmol?

1 J. Janet

2 A. So, I think that the answer is in
3 Paragraph 94 and would be understood by a
4 person of ordinary skill that this is
5 disclosing that there's a fourth correlation,
6 more specifically a fourth correlation for a
7 second device.

8 Foundationally, I mention the
9 middle of Paragraph 94, roughly in the
10 middle, upper middle that the saved
11 configurations being loaded into the robot
12 being trained, the robot is in training, not
13 that it strictly received something and
14 operated on it at face value, it's in the
15 process of being trained. It's endowed with
16 trained behaviors, but a person of ordinary
17 skill would understand that by virtue of it
18 being trained it is at liberty, and by virtue
19 of it being a different device, probably
20 necessitates some sort of tuning.

21 I go on to point out that the
22 training configuration may be loaded into one
23 or more other robots in order to provide
24 learned behaviors. That doesn't necessarily
25 mean that they are exclusively in the past

1 J. Janet

2 and are untunable. So, I think there are a
3 variety of things that get unpacked from that
4 particular quote, that particular citation.

5 Q. Okay.

6 A. One, is it comes from a document
7 where the title is Apparatus and Methods for
8 Training Path Navigation By Robots, not for
9 robots, by robots, and it's robots plural.
10 So, that means that, you know, just even
11 looking at the title, a person of ordinary
12 skill would understand that this involves
13 training where the robots, not just one
14 robot, but multiple robots are contributing
15 to the training.

16 Q. Sir, if I could pause you there
17 because I have some questions I want to ask
18 about some of the things that you mentioned
19 in your response.

20 A. Okay. But may I also say. I'm not
21 really done answering my question either,
22 so...

23 Q. Certainly, sir. And I'll give you
24 a chance to finish, but I do want to make
25 sure that I can ask questions regarding

1 J. Janet

2 things that you asked -- mentioned while they
3 are fresh in your mind. I'll give you a
4 chance to continue your response in just a
5 moment.

6 A. Okay. Thank you.

7 Q. You mentioned the title, I think of
8 Grotmol. Did you cite this or discuss this
9 title in your declaration for Limitation 4.3?

10 A. I referenced a document with the
11 title. Are you saying did I belabor how to
12 interpret the title?

13 Q. I'm saying, did you explain the
14 points that you included in your response to
15 my preceding question when you referenced the
16 title, did you explain any of that in your
17 declaration for Limitation 4.3?

18 A. Did I explain it?

19 Q. Did you include it in your
20 declaration that you submitted?

21 A. Well, the inclusion is the
22 reference itself which has this title.

23 Q. Do you --

24 A. And to me, that's a de facto
25 explanation.

1 J. Janet

2 Q. Do you understand that you need to
3 provide your complete opinions in your
4 declarations in your operation itself?

5 MR. COLVIN: Counsel, I'm sorry.
6 I don't believe Dr. Janet finished his
7 answer, you've interrupted several
8 times now. Please let him finish.

9 Q. Do you understand, Dr. Janet, that
10 you --

11 MR. COLVIN: Counsel, please allow
12 the expert to finish his explanation
13 and not cut him off. He was not done
14 answering your question when you
15 started asking him that question.
16 Please let him finish, then you may
17 ask another question.

18 A. So, just continuing --

19 MR. JAIRAM: Matt, can we go off
20 the record for just a second, please?

21 MR. COLVIN: Why do we need to go
22 off the record?

23 MR. JAIRAM: Are we off the
24 record?

25 THE COURT REPORTER: No. Once

1 J. Janet

2 everyone agrees, I'll take us off.

3 MR. JAIRAM: Okay. Matt, I can
4 certainly let Dr. Janet finish
5 answering his questions, but I think
6 you can see that by giving very, very
7 long answers and then saying that I'm
8 interrupting when it looks like he's
9 paused and I need to ask about things
10 that he said, he's not -- he's
11 effectively not answering the
12 question. That will either be
13 apparent in the record when, you know,
14 when we point to it, but I'm trying to
15 give him a chance to answer about
16 specific things. He's listing a
17 laundry list of things and I need to
18 be able to ask my questions and I need
19 to get answers to my questions.

20 MR. COLVIN: So, obviously the way
21 this works is he gives his answer and
22 after he's done, you can ask whatever
23 question you want about whatever part
24 of his answer that you need to ask
25 about. But you can't -- you can't

1 J. Janet

2 interrupt him while he's giving an
3 answer. That's all I'm saying.

4 MR. JAIRAM: Okay.

5 THE COURT REPORTER: We were on
6 the record. We didn't agree to go off
7 the record unless you want -- when
8 we're off the record, we can go back,
9 read it and decide to take it off if
10 you want. I didn't hear Mr. Colvin
11 agree to go off the record, so I
12 stayed in.

13 MR. COLVIN: That all needs to be
14 on the record.

15 BY MR. JAIRAM:

16 Q. Dr. Janet, I'm going to repeat the
17 previous question and give you the
18 opportunity to answer it.

19 Did you discuss the title of the
20 Grotmol reference in your declaration
21 regarding Limitation 4.3?

22 A. The title was included at a minimum
23 by reference and the discussion I believe
24 that speaks for itself. The title says that
25 this is training by robots. And from the

1 J. Janet
2 perspective of a person of ordinary skill,
3 I'm not entirely sure why additional
4 discussion would be needed. The name of the
5 reference, the title of the topic is
6 illuminating in and of itself, and I'm sure a
7 person of ordinary skill would understand how
8 to interpret that, particularly as it adds,
9 if necessary, any additional context to this,
10 quote, the trained configuration may be
11 loaded into one or more other robots to
12 provide learned behaviors.

13 I think that the opportunity to
14 seek the elaboration you're asking me about
15 is now. Otherwise, I don't know that I
16 belabored a piece by piece interpretation of
17 the title when it's, first of all, a very
18 small title and I think, second of all, very
19 self-explanatory to a person of ordinary
20 skill.

21 Q. And in Limitation 4.3 there is a
22 claimed fourth circumstance representation
23 correlated with the fourth one or more
24 instruct sets, right?

25 A. Yes, I believe so. You're

1 J. Janet

2 referring to --

3 Q. I'm referring to the claim
4 language, sir.

5 A. Yeah, I just want to find the
6 element.

7 Q. It's near the start of
8 Limitation 4.3.

9 A. Yeah. Fourth correlation including
10 a fourth circumstance representation
11 correlated with a fourth one or more
12 instruction sets for operating the second
13 device; is that correct?

14 Q. Well, I'm asking you, sir, do you
15 see that limitation?

16 A. I just want to make sure I have the
17 right one.

18 Q. Yes, that is the limitation I am
19 referring to.

20 A. Okay.

21 Q. And in your declaration you have
22 mapped this limitation to something in
23 Grotmol, correct?

24 A. Well, yes, I believe that that's
25 what we were talking about; is that not

1 J. Janet

2 correct, when I was talking about
3 Paragraph 94, I believe that was responsive
4 to this particular question where the trained
5 configuration may be loaded onto one or more
6 other robots to provide learned behaviors.

7 Q. I'm asking about what is provided
8 in your declaration.

9 Are you saying, sir, are that the
10 mapping of some part of Grotmol to the
11 claimed fourth circumstance representation
12 correlated with the fourth one or more
13 instruction sets for operating the second
14 device involves some portion of Grotmol that
15 is not described in Paragraph 94 of your
16 declaration?

17 A. I'm not sure I'm following your
18 question. Forgive me, it's probably my
19 fault. But maybe if you ask it again or
20 maybe ask it a little differently.

21 MR. COLVIN: I'll just note,
22 Arvind, we've been going for about an
23 hour and a half now. If this is a
24 good time for a break or you see
25 sometime in the future, I think it's a

1 J. Janet

2 good time for a break.

3 MR. JAIRAM: Sure. And we'll just
4 wrap up this line of questioning and
5 then take a break.

6 Q. The limitation fourth circumstance
7 representation correlated with the fourth one
8 or more instruction sets for operating the
9 second device.

10 I'm just asking, Dr. Janet, if you
11 provided the mapping to Grotmol entirely in
12 Paragraph 94 of your declaration or if the
13 mapping involves portions of Grotmol that are
14 outside of your declaration?

15 A. I think that Paragraph 94 is the
16 door, if you will, to Grotmol. It's a high
17 level mapping. There are a lot of -- a lot
18 of details.

19 So, for example, on Grotmol 1158
20 talks about the training of robots, plural.
21 I point out that there are numerous time
22 intervals or the training the datasets and
23 that means that they would be understandably
24 obtainable for multiple robots. The Grotmol
25 mentions this override mode which is a

1 J. Janet
2 combination of fine tuning of behaviors,
3 whether they're obtained or learned
4 exclusively on that particular vehicle and
5 it's a mixture of autonomy and if the
6 operator, whoever that is, whichever that is,
7 provides information, you know, causing the
8 robot to do things that might be -- it might
9 be inclined to do differently.

10 You know, even in the reference
11 Grotmol it talks about the brain OS software
12 where it can, among other things, remove
13 behaviors or modify those behaviors. I think
14 that's in the Column 34 range.

15 But are all of those spelled out in
16 Paragraph 94? Not necessarily. Paragraph 94
17 gives a high level description, a high level
18 mapping and the -- they're catalysts or
19 gateways, if you will, for a person of
20 ordinary skill to further understand, I think
21 that they stand on their own, but, you know,
22 if additional research is warranted, I'm not
23 entirely sure why it'd need to be, but for a
24 person of ordinary skill, if they want to
25 drill a little deeper, they can look into

1 J. Janet

2 Grotmol.

3 And a lot of these things I just
4 mentioned now off the top of my head, and I
5 can probably come up with more, are mentioned
6 elsewhere in the -- in my declaration.

7 MR. JAIRAM: Okay. Let's take a
8 break. Let's go off the record,
9 please.

10 THE COURT REPORTER: We're off the
11 record.

12 (Recess from 11:28 a.m. to
13 11:42 a.m.)

14 THE COURT REPORTER: We're back on
15 the record.

16 BY MR. JAIRAM:

17 Q. Dr. Janet, during the break, did
18 you talk to counsel regarding the substance
19 of your testimony?

20 A. No.

21 Q. Let's take a look at the section of
22 your declaration regarding claim 11 of the
23 '974 patent for Ground 2. If you could,
24 please, turn to page 104 of your declaration
25 and please tell me when you are there.

1 J. Janet

2 A. I'm there.

3 Q. Okay. Do you see that claim 11 is
4 written out in the section heading before
5 Paragraph 140?

6 A. Yes, sir.

7 Q. And claim 11 is addressed in
8 section of your declaration regarding
9 Ground 2, correct?

10 A. Yes, Ground 2 begins on page 102
11 and this -- and this discussion of claim 11
12 on page 104 is within that section.

13 Q. Is there a reason that you did not
14 put claim 11 in Ground 1, which is based on
15 the teachings of Grotmol alone?

16 A. In retrospect, I feel a person of
17 ordinary skill would understand that not only
18 would there be multiple robots, but that
19 there would be multiple teachers or users.
20 Perhaps at the time of the writing I felt it,
21 you know, required to be supplemented by what
22 a person of ordinary skill would know, but as
23 I -- as I look back on it, you know, it's
24 entirely possible it could've fit in the
25 anticipation category as well. But anyway,

1 J. Janet

2 to your question, that's why.

3 Q. Why did you feel at the time of
4 writing the declaration that the disclosure
5 of Grotmol needed to be supplemented in any
6 way for claim 11?

7 A. Well, when I say "supplemented,"
8 I'm referring to simply elaborating on what a
9 person of ordinary skill would know about the
10 broader field and not necessarily things
11 explicitly or expressly mentioned in Grotmol.
12 And as I went back and looked at it, I
13 noticed a couple of things that, in Grotmol,
14 point to how, you know, a different user
15 would also play a role.

16 Q. Do you believe that there is an
17 error in your declaration that you wish to
18 correct regarding what you just now mentioned
19 about placement of claim 11 in Ground 2?

20 A. Well, I would leave that to counsel
21 to decide. To be honest with you, I think
22 I've shared my opinion with you here that
23 it's plausibly something that could fit into
24 the anticipation realm. And as we step
25 through the testimony here, I don't know what

1 J. Janet

2 counsel -- what our options are, to be honest
3 with you. We can leave this as it is, but
4 just know that -- and after I found a few
5 more things in Grotmol, to me it's
6 comfortably in this second ground, but I
7 think plausibly in the first.

8 Q. Is there some specific claim phrase
9 or text of claim 11 that you believe is not
10 disclosed by Grotmol?

11 A. No, I don't think so. I think
12 that's the point of -- of even this section
13 as it currently stands under the obviousness
14 category.

15 Q. So, it's your opinion at this time
16 today that Grotmol discloses all the elements
17 of claim 11 of the '974 patent?

18 A. As I understand that term, yes,
19 sir. Even if, you know -- even if it has to
20 be elaborated on by what a person of ordinary
21 skill in the art would know, yes, I believe
22 that Grotmol discloses the elements of
23 limitations of claim 11.

24 Q. Let's take a look at the specific
25 claim language of claim 11.

1 J. Janet

2 Do you see that the claim initially
3 recites:

4 The knowledge base further includes
5 a fourth correlation including a fourth
6 circumstance representation correlated with a
7 fourth one or more instruction sets for
8 operating the second device.

9 A. Yes, sir.

10 Q. And if you want to go ahead and
11 just compare that to the claim language of
12 claim 4, Limitation 4.3, are those two
13 phrases identically found in Limitation 4.3
14 and claim 11, the phrase that I just
15 mentioned aloud?

16 A. I believe it's identical at least
17 that particular phrase. I don't have a side
18 by side.

19 Q. Okay. If you want to just take a
20 minute to pull up either page 60 of your
21 declaration shows Limitation 4.3 or if you
22 want to refer to Exhibit 1001, which is the
23 patent. I want to make sure that you are
24 able to provide a complete answer.

25 A. Thank you.

1 J. Janet

2 (Document review.)

3 Yes, that's identical.

4 Q. Okay. And you recall that before
5 the break we were talking about the identical
6 phrase found in Limitation 4.3?

7 A. If I understand your question
8 correctly, you're asking was 4.3 the topic of
9 our discussion before the break?

10 Q. Yes. Do you recall that?

11 A. Yes.

12 Q. Okay. So, before the break you
13 said that Grotmol discloses the claim phrase,
14 which we just now finished referencing which
15 is identically found in claim 4.3 and
16 claim 11 about the fourth correlation, right?

17 A. I believe that's what we had said,
18 yes, sir.

19 Q. So, Grotmol alone discloses the
20 fourth correlation including a fourth
21 circumstance representation correlated with a
22 fourth one or more instruction sets for
23 operating the second device, correct?

24 A. Yes, sir.

25 Q. And is it your opinion that Grotmol

1 J. Janet

2 alone discloses that portion of the claim
3 limitation for the same reasons that you
4 mentioned in your responses before the break
5 as pertaining to Limitation 4.3?

6 A. Yes, sir, I believe so.

7 Q. And is it your opinion that for
8 claim 11 the next part of the limitation
9 that's found, which is:

10 The fourth circumstance
11 representation represents a fourth
12 circumstance detected at least in part by the
13 one or more sensors of the second device.

14 Is that also disclosed by Grotmol?

15 A. Yes, sir.

16 Q. And the final wherein clause of
17 claim 11:

18 Wherein at least a portion of the
19 fourth correlation is learned in another
20 learning process that includes operating the
21 second device at least partially by another
22 user.

23 Is that also disclosed by Grotmol?

24 A. Yes, sir.

25 Q. Okay. I see that you mentioned the

1 J. Janet

2 word "obvious" a couple of times in
3 Paragraph 140 in the first sentence and in
4 the last sentence.

5 Do you see that?

6 A. Yes, sir.

7 Q. What do you mean by using the word
8 "obvious" there?

9 A. What I mean by that is that, and
10 don't hold me verbatim to this standard, but
11 a -- if something is obvious, a person of
12 ordinary skill would know from what would be
13 standard experience or typical experience of
14 a person of ordinary skill and typical
15 expertise how to fill in, let's say, a gap
16 between what is described in some explicit
17 manner and the limitations of the claim.

18 Q. Okay. Are you aware that there's
19 an Obviousness section in the legal standards
20 portion of your declaration?

21 A. Yes, sir.

22 Q. And did you follow the process laid
23 out in your Obviousness section of your legal
24 standards write-up when analyzing claim 11 in
25 Ground 2?

1 J. Janet

2 A. To the best of my recollection,
3 yes, sir.

4 Q. Okay. If you could please turn to
5 page 14 of your declaration, Paragraph 35.

6 A. Yes, sir.

7 Q. Do you see that you mention that
8 patent obviousness involves four factual
9 inquiries?

10 A. Yes, sir.

11 Q. Did you conduct your analysis in
12 accordance with what you have laid out in
13 Paragraph 35?

14 A. I believe so, yes, sir.

15 Q. For claim 11 in Ground 2, did you
16 analyze the scope and content of the prior
17 art?

18 A. Yes, sir.

19 Q. Did you analyze the differences
20 between the claimed invention and the prior
21 art?

22 A. Yes, sir.

23 Q. And what are the differences
24 between the claimed invention and the prior
25 art for claim 11 and Ground 2?

1 J. Janet

2 A. Well, as I mentioned before, there
3 really isn't much. I believe that the
4 claimed -- I'm sorry, the prior art in this
5 situation Grotmol, describes multiple robots,
6 operators in the loop or users in the loop,
7 and among other things, discusses the value
8 of a heterogeneous system, and I think those
9 things make it very clear to a person of
10 ordinary skill and that person of ordinary
11 skill would have understood that the prior
12 art understands it.

13 I think what -- where the person of
14 ordinary skill might need to elaborate for
15 the audience or the reader is the
16 circumstance for, let's just say, as one
17 example, why multiple users, not only could
18 do something, could participate in this
19 training process, but would participate in
20 this training process.

21 And so, you might notice, and I'm
22 not reading it verbatim, but in my
23 declaration, you know, I mention that because
24 it's propagated, the training data or the
25 correlations are propagated to multiple

1 J. Janet

2 robots, it stands to reason that multiple
3 users would or could be involved with the
4 subsequent training process.

5 However -- well -- and so, as a
6 person of ordinary skill where that -- where
7 you have to kind of put your obviousness hat
8 on, from my perspective and I'm obviously not
9 an attorney, but from my perspective it would
10 be why. Well, there are lots of reasons why.
11 Traffic patterns in the US are very different
12 from traffic patterns in the UK or Australia
13 or any other place. I mean, shoot, you could
14 go from one state to another and the traffic
15 signs could be very different. The markings
16 on the pavement could be very different. The
17 landscape could be very different.

18 And so, keying on, among other
19 things, Grotmol's use of the term
20 "heterogenous" and, you know, other things in
21 Grotmol's reference, also the fact that a
22 person of ordinary skill would understand
23 that no one person could possibly do all of
24 the training for all of these robots to
25 operate in all of these theaters or different

1 J. Janet

2 domains. Even if they were a phenomenal
3 driver, that doesn't mean that they would
4 match the comfort level expected of a
5 different user persona. My son brakes
6 differently than my daughter does and they
7 each give me different levels of comfort
8 depending on who I'm riding with. They --
9 again, the traffic signs may be different.
10 There are a variety of things that a person
11 of ordinary skill, perhaps from the
12 obviousness perspective, would -- may feel
13 obligated to supplement.

14 And that's where I was when I was
15 working on this declaration. The more I
16 think about it though, and again just looking
17 a bit more through Grotmol, the more I
18 believe it's a much stronger case that the
19 person of ordinary skill would not have to
20 fill in those gaps.

21 Q. Okay.

22 A. And not have to provide the context
23 and the basis of, well, is it in the scope,
24 what's the difference here between what's
25 claimed and what's in this reference. You

1 J. Janet

2 know, would I even know as a person of
3 ordinary skill and then, you know, what other
4 aspects should I consider.

5 Q. I'm just asking about what's in
6 paragraph 140 because that appears to be the
7 only paragraph of your declaration regarding
8 claim 11 for Ground 2.

9 MR. JAIRAM: And on the record,
10 I'm going to reserve the right to move
11 to strike all the discussion that
12 Dr. Janet provided that is outside of
13 what is disclosed in Paragraph 140.

14 A. Well, to be clear, Counselor, you
15 weren't asking me only about 140, you were
16 asking me about the perspective of --

17 Q. Dr. Janet, there's no question
18 pending.

19 Dr. Janet, please only answer my
20 questions. I ask the questions in this
21 deposition.

22 Dr. Janet, are you relying on
23 obviousness for your opinion for claim 11 in
24 Ground 2? Yes or no, please.

25 A. At a minimum, I'm relying on

1 J. Janet

2 obviousness in Ground 2, yes.

3 Q. When you say "at a minimum," you
4 are relying on something other than
5 obviousness?

6 A. To my original point, I believe
7 that the case is stronger than what would fit
8 into the obviousness category. As I
9 mentioned, the Grotmol reference pertains to
10 the value of a heterogeneous system and,
11 again, a person of ordinary skill would know
12 that this system is to operate in a variety
13 of domains and would need to include
14 perspectives for more than one user.

15 Q. Okay. And if you are relying on
16 obviousness for Ground 2 for claim 11, is
17 your obviousness analysis provided in
18 paragraph 140 of your declaration?

19 A. I provide, I would say, the basis
20 for that. And again, to me the value of this
21 deposition is for me to explain and, you
22 know, which I did, I know you mentioned that
23 you might move to strike, but that doesn't --
24 that really doesn't nullify the perspective
25 of a person of ordinary skill, in my opinion,

1 J. Janet

2 that referring to heterogeneous and, you
3 know, the fact that it's multiple robots and
4 it's by robots, these robots are going to
5 operate in different places, a person of
6 ordinary skill, just to clarify what's in
7 paragraph 140, would know, not just could be
8 a different user, would need to be a
9 different user to get that heterogeneous
10 system and adapt different domains.

11 Q. Let's take a look at the Hickman
12 reference, please. Can you please pull up
13 Exhibit 1005, which should be in the chat
14 window?

15 A. 1005 you said?

16 Q. Yes, sir.

17 A. Okay, it's coming up. Okay, it's
18 up.

19 Q. You relied on the Hickman reference
20 as a secondary reference for claims 4 and 11
21 of the '974 patent in this IPR, correct?

22 A. I believe so, yes, sir, on --
23 starting page 105 Ground 3.

24 Q. Yes. So, we're going to talk about
25 some disclosures in the Hickman reference.

1 J. Janet

2 Can you briefly summarize the
3 pertinent disclosures of Hickman and we will
4 go into more detail when we talk about
5 specific claims, but can you briefly explain
6 what Hickman is about?

7 A. I guess simply stated, Hickman is
8 a -- or discloses a shared robot knowledge
9 base similar to Grotmol. And it also
10 discusses the simultaneous learning by
11 multiple robots and adds a little bit of
12 clarity, although I don't believe it's
13 necessary 'cause Grotmol already describes
14 the use of Ethernet, WiFi and a variety of
15 communication modalities, but it adds a
16 little bit of clarity as to say the
17 architecture of servers that might be
18 employed. But again, Grotmol really kind of
19 discloses that too.

20 To me, it's very, very, very
21 similar, and if I'm not mistaken, Hickman was
22 cited by Grotmol. And so, very -- again,
23 very similar -- a lot of commonalities
24 between the two, particularly as it pertains
25 to the '974 patent.

1 J. Janet

2 Q. So, you said that Hickman discloses
3 a shared knowledge base similar to Grotmol.

4 Are you saying that Grotmol
5 discloses a shared knowledge robot -- a
6 shared robot knowledge base?

7 A. By virtue of Grotmol's
8 correlations, i.e. the circumstance
9 representations and the instruction sets
10 being propagated to other robots that, yes,
11 it shares a knowledge base.

12 Q. And did you say that in your
13 declaration that Grotmol discloses a shared
14 robot knowledge base?

15 A. I'm reasonably sure I do.

16 Q. Could you please point me to where
17 that would be in your declaration?

18 A. (Document review.)

19 So, among other places, and I'm
20 just perusing through right now, in reference
21 to claim 1, the term knowledge base is an
22 element what's labeled 1.2 and which I say
23 Grotmol satisfies limitations of this, among
24 other things, and acknowledging that it's a
25 very broad term, this is, you know, narrowed

1 J. Janet

2 by the '974 and otherwise satisfied by a
3 sequence of images, that's one thing.

4 The other thing is that
5 Paragraph 67 talk about Grotmol disclosing
6 accessing memory that stores multiple
7 training sets and correlations and that those
8 are propagated to other robots, hence, the
9 Grotmol sharing or utilizing a broader
10 knowledge base.

11 Q. Is it your opinion, Dr. Janet, that
12 if a configuration is learned in one robot
13 and that configuration is then loaded into
14 another robot, that such disclosure
15 constitutes a shared knowledge base?

16 A. Can you use the term
17 "configuration"?

18 Q. Referring to the trained
19 configuration of Grotmol, Column 33, Line 32
20 that we talked about at some length earlier
21 today.

22 A. Right.

23 Q. You cited to a trained
24 configuration that's loaded into another
25 robot. I am asking you, sir, if that

1 J. Janet

2 disclosure in Grotmol is what you are now
3 referring to as a shared robot knowledge
4 base?

5 A. Yeah, I'm not really sure how else
6 to answer this other than the knowledge base
7 includes images, the images are among the
8 circumstance references, or representations,
9 and the training sets or training data are
10 shared with other robots, per Grotmol, hence,
11 the sharing of the knowledge base.

12 Q. Okay. If you can please look at
13 Paragraph 142, of your declaration.

14 A. Okay let me get there.

15 Q. Do you see the first sentence you
16 mentioned "the shared robot knowledge base of
17 Hickman"?

18 A. Sorry, took me a second to get
19 here. Paragraph 142 you said.

20 Q. Yes. Sir in the first sentence of
21 that paragraph, do you see that you mention
22 "the shared robot knowledge base of Hickman"?

23 A. Yes.

24 Q. And if I understood your testimony
25 from a few minutes ago, you said that Grotmol

1 J. Janet

2 also has a shared robot knowledge base; is
3 that correct?

4 A. That's correct. As I mentioned
5 before, I'm not even -- I don't feel like
6 this second reference is necessary, but just
7 to add a little bit of -- little better
8 overlap in terms relative to the '974, yes, I
9 agree, I believe Grotmol already discloses
10 that the knowledge base is being shared.

11 Hickman more, you know, uses terms
12 more closely aligned to that.

13 Q. Yes, sir. I'm just trying to
14 figure out what exactly your opinions were
15 and, you know, please bear with me as I try
16 to understand what your positions were
17 because I think -- I think it's, as you have
18 mentioned, you know, whether something is
19 disclosed or not in Grotmol or whether you
20 needed to use Hickman, if that's something
21 that's little unclear, that's why I'm asking
22 these questions.

23 So, when you mentioned in
24 Paragraph 142's first steps "the shared robot
25 knowledge base," what did you mean by that?

1 J. Janet

2 A. Sorry, did somebody else say
3 something?

4 Q. No, sir.

5 Let me repeat the question just --

6 A. Yeah, sure.

7 Q. -- just for the record.

8 In Paragraph 142 in the first
9 sentence, what did you mean by "the shared
10 robot knowledge base of Hickman"?

11 A. Well, I meant the same thing
12 Grotmol is doing which is sharing information
13 and using the same methodologies for sharing
14 information which would include servers and
15 WiFi and other types of physical layers.
16 It's really about, for Hickman, the, I think,
17 more expressed language of simultaneously
18 learning across multiple devices and multiple
19 users and less about is there a knowledge
20 base that is being shared.

21 Q. Okay. To just be clear, your view
22 is that Grotmol discloses a shared robot
23 knowledge base, correct?

24 A. I believe both of them do, yes,
25 sir.

1 J. Janet

2 Q. Okay. Let's take a look at
3 Figure 3 of Hickman.

4 A. Figure 3 of Hickman? Okay.

5 Q. So, do you see that in the dotted
6 box there is shown a shared robot knowledge
7 base 306?

8 A. Yes.

9 Q. And part of that is shown at the
10 bottom of Figure 3, it's -- there's a
11 knowledge base 307, a knowledge base 308, a
12 knowledge base 309 and couple of other
13 knowledge bases to the right labeled as 310
14 and 311?

15 A. Yes.

16 Q. You see all that?

17 A. I do.

18 Q. Okay. Can you briefly explain what
19 these knowledge bases are?

20 A. Well, like Grotmol, they include
21 circumstantial representations, which, among
22 other things, might include the unique
23 objects, the general objects, the map and
24 instruction sets, which might include, but
25 may not be limited to the task knowledge

1 J. Janet

2 base.

3 Q. So, why is there knowledge base 307
4 and a different knowledge base 309?

5 A. (Document review.)

6 So, 307, just following the
7 description in Grotmol starting Column 11, it
8 describes the unique object knowledge base.
9 It stores -- the 307, let's see:

10 The unique object knowledge
11 base 307 is configured to store data about
12 unique objects that a robot may encounter or
13 interact with its environment.

14 A, quote, unique object is an
15 object that can be identified with
16 specificity as being a specific individual
17 object.

18 For example, a specific
19 refrigerator that belongs to a specific
20 person. So -- and I could go on there. But
21 that's 307.

22 Q. Why is there a different knowledge
23 base 309?

24 A. Let me -- let me try to be precise
25 here.

1 J. Janet

2 309 is described by name as, if I'm
3 remembering correctly, like a task knowledge
4 base and this would include just borrowing
5 from the paragraph in Column 19, instruction
6 code for performing task, so, instructions,
7 if you will, that would be correlated to the
8 content of the, like, 307 and I can't
9 remember the one that was next to it, it was
10 more of a general knowledge base -- object.
11 What was it called in -- general object
12 knowledge base 308.

13 If you also look at Column 11, the
14 task knowledge base, that's the name of 309.

15 Q. So, Dr. Janet, you just mentioned
16 instructions, if you will, that would be
17 correlated to the content of 307.

18 Can you tell me what you mean by
19 that?

20 A. Sure. There's more to it than
21 this, of course, but Hickman mentions the
22 task identifier, TID, and that corresponds to
23 a particular task that a robot may perform to
24 interact with an object in its environment,
25 hence the correlation.

1 J. Janet

2 Q. The correlation between what, sir?

3 A. Or correspondence between what's
4 observed from the object knowledge base and
5 the instruction set.

6 Q. When you say "what's observed from
7 the object knowledge base," is there
8 something here in Figure 3 that you are
9 referring to?

10 A. Just give me a second because I'm
11 flipping back and forth. I'm going to do a
12 small screen capture of this so I don't have
13 to flip back and forth, okay.

14 Q. Sure.

15 A. Figure 3.

16 Q. Okay.

17 A. So, again, I refer to, among other
18 places, and I defer, of course, to my report,
19 but in Column 20 starting Line 22 or so:

20 As described above, some
21 embodiments of the shared robot knowledge
22 base 306 may include a task knowledge base
23 309. Task knowledge base may be configured
24 to store data and task instruction code
25 associated with different tasks that a robot

1 J. Janet

2 may perform to interact with the objects and
3 its environment. The objects being
4 identified or correlated to 307 and 308.

5 Q. Okay.

6 A. If I remember correctly.

7 Q. Okay. So, I kind of followed. In
8 Figure 3, are you saying that something,
9 let's call it X, is correlated to something
10 else, let's call it Y, what is X and what is
11 Y? I'm trying to be kind of specific here in
12 understanding what you're pointing to.

13 A. Well, X might correspond -- might
14 include, not be limited to, the object that's
15 identified. There's --

16 Q. And the object -- sorry. Go ahead.

17 A. There's probably more to it than
18 that because it's not just what is the object
19 that's identified, it's, you know, what is
20 the -- what is the broader kind of mission,
21 if you will. But that's like somebody
22 driving a car, okay, I'm driving from here to
23 let's say Minneapolis, and I identify an
24 object like a traffic sign, that might be my
25 X, and the Y might be the past identification

1 J. Janet

2 or instructions, if you will, for interacting
3 with that. And interacting doesn't mean I'm
4 necessarily manipulating the traffic sign, it
5 means that I'm providing some sort of a
6 meaningful response, whether it's in the
7 preservation of the vehicle or, you know,
8 obeying the laws or something to that effect.
9 But the Y in this situation example, as best
10 as I can remember and I can spend more time,
11 dig a little deeper on this and we can cross
12 reference this with my report, which again I
13 defer to, that would probably be the Y.

14 Q. Okay. And we'll take a look at
15 your declaration with respect to specific
16 claim limitations in just a sec. I'm just
17 trying to understand Hickman before we dive
18 into that.

19 You said that the X is the object.
20 Where is the object in Figure 3? Is there an
21 object identifier or is there an object in
22 some other way? I'm just trying to
23 understand what you are pointing to as X when
24 you say that X is correlated with Y in the
25 example that we just discussed?

1 J. Janet

2 A. Well, X may come from 307, 308, it
3 may also come from 310. So, that's why I'm
4 saying that X isn't just a single scale or
5 value or a singleton value. It's usually a
6 vector or a structure that has bits of
7 information that provide this circumstantial
8 representation.

9 Q. When --

10 A. And --

11 Q. I'm sorry, I thought you were done
12 speaking.

13 A. I understand.

14 Q. There might be a little bit of a
15 lag here.

16 A. Yeah.

17 Q. Please continue.

18 A. You know what, I'll leave it at
19 that for right now. I kind of lost my train
20 of thought there for a second.

21 Q. Okay.

22 A. It'll probably come back to me.

23 Q. I'm trying to nail down again what
24 is correlated with what. The X, the X you
25 say could be in 307, 308 or 310. Do you mean

1 J. Janet

2 one of the fields that we see in Figure 3 of
3 307? Let's just take 307, I think you said
4 that's one example. You said 307 is one
5 example of where X could be; is that right?

6 A. Well, 307 may be an element of X,
7 'cause X is a circumstantial representation
8 and it may include what objects are in the
9 scene and where they are relative to each
10 other, how big they might appear, or small,
11 what map we're operating from, which would be
12 potentially 310, or it could just simply be
13 the entirety of the scene knowing that these
14 bits and pieces, you know, from the -- from
15 the object knowledge base both general and
16 unique can be derived.

17 But I'm trying to kind of re-answer
18 this for you. The X is not a, is there a
19 stop sign, it's, is there a stop sign and,
20 you know, in what map or, you know, where are
21 we? We're in the image.

22 So, if I were to identify objects
23 within a scene, that object recognition is
24 most likely from the perspective of person of
25 ordinary skill, part of this -- want to use

1 J. Janet

2 the same term. Well, part of the image,
3 basically, part of the circumstantial
4 representation.

5 Q. Dr. Janet, is it your position that
6 Hickman discloses a circumstance
7 representation correlated with an instruction
8 set?

9 A. Yes.

10 Q. Okay.

11 A. We can go to my report.

12 Q. Yeah, we're going to go to it in
13 just a sec and we're going to look at claim 4
14 and claim 11 in just a sec. I'm just trying
15 to understand by looking at Figure 3 what
16 parts of the reference we're gonna be talking
17 about. And you said for the Y, the letter Y,
18 that X is correlated with Y, I think you said
19 in your response a minute ago that Y is the
20 task ID or the instruction set; is that
21 correct?

22 A. You're asking me a bit of a
23 hypothetical and I was trying to map it to
24 your hypothetical. If you're saying if --
25 so, for example, Grotmol's use of, I think it

1 J. Janet
2 was K-nearest neighbors or particle filter, I
3 can't remember, you know, there was an X,
4 there was a Y. Let me go to it. And I think
5 you're trying to arrive at the same thing
6 even though they both provide a very
7 overlapping example of, among other things,
8 the fetch example. Yeah. So, the K-nearest
9 neighbors, what paragraph am I on here,
10 Paragraph 77 of Grotmol you have.

11 Q. Paragraph 77 of Grotmol?

12 A. I'm sorry, I apologize for that.
13 Paragraph 77 of my declaration.

14 You have -- and I want to make sure
15 they're not reversed here. You have the
16 input X in that situation that would be the
17 circumstantial representation and the output
18 by the control signals. So, trying to answer
19 your question in the context of how you
20 framed it, X from the perspective of a person
21 of ordinary skill looking at Figure 3, and
22 without doing any additional research for
23 clarification as I sit here, would include
24 information from the unique object knowledge
25 base, the general object knowledge base,

1 J. Janet

2 possibly the map knowledge base, and I'd have
3 to go back to get a reminder on application
4 knowledge base, but those would probably --
5 elements of those would fit into what you're
6 asking me fits into X.

7 Q. Okay.

8 A. And then, again, looking at this
9 and without researching for additional
10 clarity, as I sit here, the task knowledge
11 base, 309, would provide, again, if I
12 understand your example correctly, the Y.
13 And you can even see 315 of Hickman, you have
14 INST, which again if I'm remembering
15 correctly, is instruction data, INST.

16 Q. Okay. Just to be clear, sir, I'm
17 not talking about a hypothetical. I was
18 referring to your testimony where you
19 mentioned correlation in your response and
20 I'm trying to understand what correlation in
21 Hickman you were referring to.

22 Do you understand, sir, that I'm
23 not talking about a hypothetical?

24 A. Well, I think that the best thing
25 to do is stick to what's in my declaration.

1 J. Janet

2 You're asking me to perhaps relabel
3 something, which can create a lot of
4 confusion and by virtue of asking me to
5 relabel things or recategorize them or, you
6 know, force a comparison, to me that would --
7 that would be pretty close to the
8 hypothetical.

9 I'm happy to, you know, let's take
10 a look at my declaration and we can kind of
11 step through that.

12 Q. Yeah, let's dive into that after a
13 lunch break.

14 MR. JAIRAM: Let's go off the
15 record.

16 THE COURT REPORTER: We're off the
17 record.

18 (Lunch recess from 12:44 p.m. to
19 1:31 p.m.)

20 THE COURT REPORTER: We're back on
21 the record.

22 BY MR. JAIRAM:

23 Q. Dr. Janet, did you talk with
24 counsel about the substance of your testimony
25 during the break?

1 J. Janet

2 A. I did not.

3 Q. Okay. Let's turn, please, to
4 Paragraph 150 of your declaration pertaining
5 to claim 4 in Ground 3. And please tell me
6 when you are there.

7 A. I'm here.

8 Q. For claim 4 in Ground 3, you are
9 relying on Grotmol in view of Hickman,
10 correct?

11 A. Under Ground 3, yes.

12 Q. What features of claim 4 are not
13 disclosed in Grotmol for your analysis of
14 claim 4 in Ground 3?

15 A. Well, as I mentioned earlier, I
16 believe that the features of claim 4 are
17 described or disclosed in Grotmol. This --
18 this third ground is to help the reader
19 further see uses of the vernacular, you know,
20 regarding multiple devices or, you know, a
21 different claim, multiple users. Vernacular
22 being that, you know, the complementary
23 vernacular that's brought forth by Hickman.
24 But quite frankly, I believe that a person of
25 ordinary skill would understand that Grotmol

1 J. Janet
2 teaches it all. This is just really meant to
3 be a clarifier if necessary, and I don't feel
4 like it should be necessary, but, you know,
5 it goes into a bit more detail about how the
6 server would be configured than what you
7 would find in Grotmol. But Grotmol still has
8 network devices and discloses network devices
9 that would -- would constitute what's
10 described in Hickman.

11 So, you know, going from memory, I
12 think it's Figure 7, you've got what appears
13 to be a server and means of communication,
14 wireless communication included. You've got
15 to -- I think, dimension of a server in
16 Grotmol. I'm going from memory, but maybe 45
17 or 46. The network communication stuff, if
18 I'm not mistaken for Grotmol Figure 7, Column
19 8 around Lines 20 and you got Ethernet, WiFi,
20 cellular. You know, I kind of feel that
21 Grotmol really, to a person of ordinary
22 skill, would provide it all. So, it's just
23 that Hickman kind of goes into more detail
24 about how you would construct the server and
25 maybe a little bit more clarity on how the

1 J. Janet

2 knowledge basis would be structured as well
3 so that they can be accessed by different
4 robots and -- for devices out in the field.
5 And then tweaked with what's tweaked by, in
6 this situation, humans, the human teachers by
7 any second robot.

8 Q. Dr. Janet, the long response you
9 gave is not responsive to my question. I'll
10 ask it again and I'll try to rephrase it to
11 hopefully make it more understandable to you.

12 I understand that in Ground 1 you
13 have provided opinions that Grotmol discloses
14 all the features of claim 4.

15 I'm asking now about Ground 3. For
16 Ground 3, what features are you relying on
17 Hickman for? What features of claim 4
18 specifically?

19 A. I believe I provided that answer to
20 you just a minute ago, but I will reiterate.

21 So, Hickman has more clarity on
22 the -- this server based knowledge base that
23 can be accessed by multiple robots and
24 multiple users and is a complement to, but in
25 many, many ways, as I mentioned before,

1 J. Janet

2 overlaps Grotmol.

3 Q. I'm asking specifically, Dr. Janet,
4 what features of the claim, the claim
5 language, and if you want, we can walk
6 through the claim language word by word, I'm
7 asking what portion of the claim language of
8 claim 4 are you relying on Hickman for in
9 Ground 3.

10 A. So, I feel like it's important to
11 say when, you know, while I'm relying on
12 Hickman, I want to make sure it's clear, I'm
13 not exclusively relying on Hickman. It's
14 that Hickman provides a complement, a
15 substantial overlap, it's not to the -- it's
16 not in any way saying that Grotmol doesn't
17 provide this. So, I just want to make sure
18 that that part is clear.

19 Q. Okay.

20 A. As far as -- go ahead. I'm sorry.

21 Q. Do you see claim 4 is written out
22 on page 111 of your declaration?

23 A. Yes.

24 Q. Do you see that various words are
25 providing features of the claim?

1 J. Janet

2 A. Yes.

3 Q. Can you tell me -- can you point me
4 to -- can you point me to one and then if you
5 want you can point to a second after that and
6 a third and so forth. Can you point me to a
7 feature recited in claim 4 that you believe
8 -- I'll strike that.

9 Can you point me to a feature of
10 claim 4 that you relied on Hickman for in
11 your declaration for Ground 3?

12 A. So, Hickman provides the learning
13 process where generating or receiving a first
14 circumstance representation and generating or
15 receiving the second circumstance
16 representation.

17 Q. Okay, let's pause right there?

18 A. Okay.

19 Q. And let's analyze that, and then we
20 can move on to the next chunk.

21 A. Sure.

22 Q. I'm going to put it on the screen,
23 the claim language. I suppose I'll put your
24 declaration on the screen to make it easier.
25 I'm going to page 111 of your declaration.

1 J. Janet

2 Okay. Do you see that I am
3 highlighting the claim language?

4 A. I don't see -- I don't.

5 Q. I'm sorry. You can't see my
6 screen, of course. I need to first share the
7 screen. Okay. Now, can you see that I am
8 highlighting text in claim 4?

9 A. Yes.

10 Q. Okay. I believe that you just now
11 mentioned the first generating or receiving
12 and the second generating or receiving
13 clauses, which I have highlighted on my
14 screen.

15 Do you see the highlighting that
16 I've made on my screen?

17 A. I see it.

18 Q. Are you relying on Hickman for
19 these features that I have highlighted:

20 Generating or receiving the first
21 circumstance representation, and generating
22 or receiving the second circumstance
23 representation.

24 A. Yes.

25 Q. Okay. And in Ground 3 for this

1 J. Janet

2 same claim, claim 4, are you also relying on
3 Grotmol for this feature, the same feature
4 that I just mentioned generating or receiving
5 the first circumstance representation and
6 generating or receiving the second
7 circumstance representation?

8 A. Well, as I mentioned before, yes, I
9 believe that Grotmol discloses that.

10 Q. So, just to be clear, you are
11 relying on Grotmol for this first recitation
12 of generating or receiving and the second
13 generating or receiving of claim 4 for
14 Ground 3?

15 A. Counsel, my concern here is it's
16 sounding like I am relying on one to the
17 exclusion of the other and all I'm trying to
18 say is they both do it.

19 Q. Okay. I'm just trying to
20 understand what your opinions are exactly.
21 And if your opinion is that both Grotmol and
22 Hickman disclose the first generating or
23 receiving and the second generating or
24 receiving, and you are relying on both of
25 them for your claim 4 analysis in Ground 3,

1 J. Janet

2 then, please, can you confirm that that is
3 what you are relying on?

4 MR. COLVIN: Objection. Vague.

5 Q. Okay. Let's rephrase that.

6 I'm trying to understand your
7 mapping, that is, your analysis that maps the
8 claim language to the prior art.

9 Is it your opinion for Ground 3,
10 claim 4, that both Grotmol and Hickman
11 disclose generating or receiving the first
12 circumstance representation and generating or
13 receiving the second circumstance
14 representation?

15 A. Yes, that's my opinion and --

16 Q. Okay. And is it your opinion for
17 the purpose of the Ground 3 analysis that
18 Hickman is supplementing some deficiency of
19 Grotmol with respect to the limitation
20 generating or receiving the first
21 circumstance representation and generating or
22 receiving the second circumstance
23 representation?

24 A. No, I don't feel like Grotmol has a
25 deficiency there. I don't feel that Hickman

1 J. Janet

2 has a deficiency there either.

3 Q. Do you follow the Obviousness
4 analysis that you set forth in your legal
5 standards section in your Ground 3, claim 4
6 analysis of your declaration?

7 A. Yes, sir, I believe I do.

8 Q. And you identified any differences
9 between the claim language and the prior art
10 for claim 4 in Ground 3?

11 A. I have -- I've tried to explain
12 this in our deposition today. I do not
13 believe that Grotmol has deficiencies to the
14 degree that it would not be an anticipated --
15 an anticipatory reference invalidating prior
16 art. I merely believe that including Hickman
17 provides the reader with additional clarity
18 on how to perhaps structure this server
19 based, for lack of a better word,
20 multi-tenant, multi-user knowledge base
21 repository, which both provides and receives
22 circumstantial representations and
23 instruction sets.

24 Q. Okay. I heard you say that you
25 provided today in this deposition certain

1 J. Janet

2 information. My question, which I asked a
3 couple of questions ago is: In your
4 declaration that you have submitted, did you
5 address any differences between the claimed
6 invention and the prior art for claim 4 in
7 Ground 3?

8 A. I'm gonna answer the same way, sir.
9 I don't consider there to be deficiencies to
10 the extent that Grotmol can't be obvious in
11 light of a person of ordinary skill or
12 invalidating or anticipating anticipatory
13 reference, I'm merely adding some clarity so
14 that the reader, the audience can perhaps see
15 a different perspective, perhaps see a few
16 more details of what's already described by
17 Grotmol, that's really how I'm approaching
18 this.

19 And, you know, I -- in the
20 declaration, you know, I say, Paragraph 151:

21 Grotmol and Hickman render obvious
22 the additional requirement in claim 4 that
23 the knowledge base includes a fourth
24 correlation which includes a circumstance
25 representation detected by sensors of a

1 J. Janet

2 second device correlated with an instruction

3 set for operating the second device.

4 As I mentioned to you, sir, the

5 Grotmol discloses this, so does Hickman. So,

6 if somebody's not convinced that Grotmol

7 discloses this I'm not entirely sure why they

8 wouldn't be, but just in case they are, then

9 Hickman adds a bit more clarity. Figure 5,

10 for example, shows to the claim element that

11 you have highlighted, among others, that if

12 an object is not in the -- in the shared

13 robot knowledge base, that robot creates a

14 new object identifier in the shared robot

15 knowledge base for the new object and stores

16 it and now the knowledge base has the --

17 essentially what you've got highlighted. A

18 second device can do the same thing. If it's

19 not already there, in Hickman it makes it

20 clear. My opinion, Grotmol makes it clear.

21 But just kind of looking at Hickman, you

22 know, how are they both doing the same thing

23 and Hickman just articulates it slightly

24 differently it's got a graphic that might be

25 more clear to the reader.

1 J. Janet

2 Q. Your response is not responsive,
3 sir, to my question. I will repeat it.

4 A. Just so you know, I'll probably
5 repeat my answer. Go ahead.

6 Q. The legal standard section of your
7 declaration mentions at Paragraph 35 that
8 obviousness involves four factual inquiries.
9 And the second of those inquiries is the
10 differences between the claimed invention and
11 prior art?

12 Do you recall that being in your
13 declaration?

14 A. I do.

15 Q. And did you or did you not, and
16 please provide a yes/no if you can, did you
17 or did you not address the differences
18 between the claimed invention and the prior
19 art for claim 4 in Ground 3 in your
20 declaration?

21 MR. COLVIN: Objection. Asked and
22 answered.

23 A. I think you're seeking a yes/no and
24 I appreciate you considering the fact that
25 there might not be a yes or no to this. I

1 J. Janet
2 considered it. The challenge here is that
3 it's not so much, is there a deficiency, it's
4 might somebody perceive there to be a
5 deficiency, and I think that's the major
6 point of bringing in Hickman is, if you're
7 reading this as a person of ordinary skill,
8 my opinion, you would understand that Grotmol
9 teaches it all. If on the other hand in
10 deference to other perspectives from counsel
11 or the board or anybody else, if there is a
12 hint of a risk that that might not be
13 perceived as, in a convincing manner, fully
14 disclosing, then Hickman is brought in. But
15 in my opinion, Hickman really wasn't
16 necessary, a second reference wasn't
17 necessary.

18 Q. Can you point me to a specific
19 paragraph of your declaration for claim 4 in
20 Ground 3 where you explained why you are
21 bringing in Hickman or a specific limitation
22 in claim 4?

23 A. Yeah. So, for example, let's see.
24 This is probably not comprehensive, but
25 Paragraph 153 where Grotmol acknowledges that

1 J. Janet

2 the task, a particular task can be complex
3 and that there are numerous user training
4 steps that would be needed to teach a skill
5 to a robot. This further motivates the
6 desire to, quote, implement a system wherein
7 learned robot behaviors could be uploaded to
8 a shared knowledge base for use in numerous
9 other robots around the world, such as the
10 system described in Hickman.

11 Q. And where does it say what
12 limitation that is referring to?

13 A. For use in other numerous robots
14 around the world, you're referring to that?

15 Q. When I say "a limitation," I'm
16 referring to the claim language.

17 Where in the Paragraph 153 which
18 you just spoke aloud, where does it mention a
19 claim limitation of claim 4?

20 A. Well, I would say any time that you
21 have a circumstance representation and a
22 correlated instruction set that are resident
23 to, downloaded from or put upon or put into a
24 knowledge base, that's what that paragraph
25 refers to.

1 J. Janet

2 Q. And I see that the Paragraph 153
3 has seven lines. I am really just trying to
4 find where you are talking about. Can you
5 point me to which line or lines?

6 A. It's the last sentence. The last
7 sentence.

8 Q. Can you read that sentence aloud?

9 A. Sure, I'll read it again.
10 In my opinion, it would be
11 desirable to implement a system wherein
12 learned robot behaviors could be uploaded to
13 a shared knowledge base for use in numerous
14 other robots around the world, such as the
15 system described in Hickman.

16 Q. And what limitation of claim 4 is
17 that referring to?

18 A. I feel like it's a blanket
19 statement for claim 4, but let's just say
20 particularly wherein at least a portion of
21 the fourth correlation is learned in another
22 learning process that includes generating or
23 receiving the fourth circumstance
24 representation and obtaining or receiving the
25 fourth one or more instruction sets for

1 J. Janet

2 operating the second device.

3 Q. And you believe that that wherein
4 clause is addressed by Paragraph 153 of your
5 declaration?

6 A. I would say in part, yes.

7 Q. Okay. Let's go back to the -- one
8 of the earlier limitations which I had
9 previously highlighted, I'll highlight it
10 again. The first generating or receiving and
11 the second generating or receiving recited in
12 claim 4, and there's some additional words
13 after receiving in both of those instances.

14 You testified a short while ago
15 that you were relying on both Grotmol and
16 Hickman for that portion of claim 4.

17 Do you recall that?

18 A. What I said was that both Grotmol
19 and Hickman could apply.

20 Q. And can you point me to which
21 paragraph of your declaration contains that
22 opinion of yours?

23 A. If you'll notice immediately after
24 claim 4 is stated on page 111, I provide what
25 is disclosed by Grotmol, among other things,

1 J. Janet

2 giving training set may comprise an instance
3 of the video frame, an instance of the binary
4 signal and an instance of a motor control
5 indication configured to cause the robot to
6 execute an action and discuss the training
7 buffer in those excerpts on page 112.

8 And I then go on to say a person of
9 ordinary skill would've understood Grotmol to
10 disclose first, second, third, fourth, et
11 cetera correlations, where each correlation
12 includes a circumstance representation
13 correlated with an instruction for operating
14 the robotic device.

15 Q. And where did you say, sir, that
16 Hickman discloses all those things that you
17 contend that Grotmol discloses?

18 A. Well, I mentioned that again in
19 Paragraph 153, and I can certainly try to
20 locate in other paragraphs, but, you know, it
21 implements a system wherein learned robot
22 behaviors could be uploaded to a shared
23 knowledge base for use in numerous other
24 robots around the world, such as the system
25 described in Hickman.

1 J. Janet

2 Q. You just testified a couple of
3 responses ago that that final sentence of
4 Paragraph 153 addresses the wherein clause at
5 the end of claim 4, did you not?

6 A. I said in part. You may also
7 notice that in the next paragraph, Hickman
8 discloses a shared robot knowledge base or
9 shared robot knowledge basis for use with
10 cloud competing systems that collects data
11 from a robot about an object the robot has
12 encountered in its environment and stores the
13 received data in the shared robot knowledge
14 base... sends instructions for interacting
15 with an object to a robot... sends
16 instructions to a robot for executing an
17 application based on information stored in
18 the shared robot knowledge base.

19 And that's from Hickman.

20 Q. Sorry, go ahead.

21 A. And, you know, I also mentioned
22 that -- well, I mentioned Figure 5, which I
23 told you -- I had mentioned covers that, kind
24 of, that new learning, if you will, but if
25 you go a little further down you'll notice

1 J. Janet
2 that the robot experiences come from the
3 coaching humans -- the humans that are
4 coaching it. And further, that a human can
5 coach the robot on how much force to use as
6 an example, that would be the instruction
7 set. Send feedback to the cloud processing
8 system with a modified grasping force. So --
9 and in this situation, the second robot has
10 in effect learned from the experience of an
11 earlier robot, but has also provided
12 knowledge of this first element that we're
13 focusing on.

14 Q. Okay. There's a bit of stuff to
15 unpack there, so let me try and break it into
16 smaller chunks.

17 Do you feel that your declaration
18 at Paragraph 153 is simultaneously addressing
19 the initial limitation of claim 4 regarding
20 the first generating or receiving and the
21 second generating or receiving and also
22 addressing the wherein clause at the end of
23 claim 4 about wherein at least a portion of
24 the fourth correlation is learned...

25 A. I don't think it's limited to 153.

1 J. Janet

2 I also, in my response, provided content from
3 Paragraph 154.

4 Q. But I'm asking specifically about
5 your sentence at the end of 153 since you
6 mentioned it. Initially you said that it
7 pertains to the wherein clause at the end of
8 claim 4, later you said it pertains to the
9 initial portion of claim 4 and I'm trying to
10 understand your testimony.

11 Is it your opinion that that final
12 sentence of Paragraph 153 is your mapping for
13 both the initial portion and the final
14 portion of claim 4?

15 MR. COLVIN: Objection. Vague.

16 A. Yeah, my response would be the same
17 without, you know, just based on my
18 interpretation of your question is that in
19 part that last sentence of 153 covers --
20 well, I mean it talks about implementing a
21 system wherein learned robot behaviors would
22 be uploaded to a shared knowledge base for
23 use in numerous other robots around the world
24 such as the system described in Hickman.
25 And, you know, go ahead.

1 J. Janet

2 Q. I thought you were done speaking,
3 I'm not trying to interrupt you.

4 A. Understood.

5 Q. In Paragraph 154, you mentioned in
6 your testimony a few responses ago human
7 coach training a robot.

8 Do you recall that testimony you
9 gave a couple of responses ago?

10 A. Yeah, something close to that.

11 Q. And what limitation of claim 4,
12 what claim language of claim 4 is your
13 discussion of the human coach training of
14 Paragraph 154 of your declaration pertinent
15 to?

16 A. Well, it's pertinent to learning
17 the instruction sets.

18 Q. Okay. Let's look at the language
19 of claim 4 specifically, I've got it all up
20 on the screen. Can you tell me which
21 specific claim language? I'm trying to be
22 very specific so I do not misunderstand you.

23 A. You're asking me to limit this to
24 one thing and I think we're going to go
25 around in circles and I'm trying to explain

1 J. Janet

2 there are a few elements within this claim
3 that are covered by what I mention about
4 Hickman or Grotmol simultaneously.

5 So, if a human, and you know this,
6 but if a human is coaching, then that human
7 is helping to provide the instruction set and
8 so it's obtaining that instruction set and
9 then it's uploaded to the knowledge base or
10 loaded to the knowledge base, whether it's
11 propagated to other robots or just to the
12 server.

13 Q. Okay. I have highlighted on the
14 screen the two obtaining clauses of claim 4:

15 Obtaining or receiving the first
16 one or more instruction sets for operating
17 the first device, and obtaining or receiving
18 the second one or more instruction sets for
19 operating the first device.

20 Is that what you are referring to
21 as when you just now mentioned the obtaining?

22 A. (Document review.)

23 So, if I'm remembering correctly,
24 and again, I defer to my report, but the
25 generating, the circumstance representation

1 J. Janet

2 would be sensor based, obtaining the --
3 receiving the first one or more instructions
4 could be from the human coach.

5 Q. So, the human coaching discussion
6 that you put at Paragraph 154 of your
7 declaration, is that referring to the
8 highlighted text on my screen right now,
9 which is the first obtaining and the second
10 obtaining, which for convenience I will just
11 refer to as the obtaining features for right
12 now?

13 A. I would say not exclusively from a
14 human coach, it's entirely possible that it
15 was previously learned and is downloaded from
16 the knowledge base.

17 Q. I'm trying to understand, sir, when
18 you talked about Hickman describing human
19 coach training, which part of claim 4 are you
20 relying on Hickman for, if it's not the first
21 and second obtainings, can you please point
22 me to which part of claim 4 it is pertinent
23 to?

24 A. Counselor, I think I answered this
25 question several times. The obtaining can

1 J. Janet

2 come from a human coach. The obtaining can
3 also come from downloading it from a
4 knowledge base. Think there's some -- maybe
5 there's -- you might be looking for a very
6 narrow read on this. If so, I guess I'd like
7 to understand what that is.

8 Q. I'm not looking for any particular
9 read or narrow read or otherwise read, sir.
10 I am simply trying to understand your claim
11 mapping.

12 Can you point me to which paragraph
13 or paragraphs of your declaration for claim 4
14 in Ground 3 address which reference you are
15 relying on for the first and second obtaining
16 limitations of claim 4?

17 A. Both references provide this.

18 Q. Okay.

19 A. And I --

20 Q. Can you point me to a specific
21 paragraph in your declaration or paragraphs
22 where you have expressed that opinion?

23 A. I'm certain I already have. Let me
24 go back.

25 Q. If you could just provide me the

1 J. Janet

2 paragraph numbers, I will move on.

3 A. Well, we can also look at the
4 transcript, I'm certain I've already done
5 this.

6 Q. I'm just asking for the paragraph
7 number, sir.

8 A. Well, what you're asking me to do
9 is go back and forth and repeat answers to
10 you. So --

11 Q. No, sir, I'm not.

12 A. -- I will go back and forth again.

13 Q. Sir, I will repeat my question.

14 Can you tell me which paragraphs or
15 paragraph of your declaration contain your
16 claim mapping for the first and second
17 obtaining clauses of claim 4?

18 A. Paragraph 149, among others.

19 Q. Sir, Paragraph 149 is not --

20 A. I'm sorry, I'm sorry. Let me step
21 forward here. So, Paragraph 151, combination
22 of Grotmol and Hickman, because both do this,
23 provide that the knowledge base includes a
24 fourth correlation could be first, second or
25 third, which includes a circumstance

1 J. Janet

2 representation detected by sensors of the
3 second device correlated with an instruction
4 set. And let me drill down a little further.

5 I mention in 152 that Grotmol
6 discloses that these training sets, which are
7 the correlations that we're referring to,
8 what they include, they can be loaded on the
9 robot, they can be loaded on the multiple
10 robots.

11 Q. So, is that paragraph part of your
12 response? It's hard for me to tell, sir.

13 A. It is part of my response, yes,
14 sir.

15 Q. Okay.

16 A. I feel like we're covering the same
17 quarter acre here and I think that what
18 you're trying to do is you're trying to
19 dissect it so that only one fraction of a
20 paragraph or even a sentence addresses a
21 limitation of the claim and I'm trying to
22 explain that, A, both references address
23 this, and B, that both, you know, aspects of
24 both can individually address these
25 limitations, so... Hickman --

1 J. Janet

2 (Cross-talk.)

3 A. -- describes in 154, excuse me, a
4 shared robot knowledge base for use with
5 cloud competing systems that collects data
6 from a robot about an object the robot has
7 encountered in its environment and stores the
8 received data in the shared robot knowledge
9 base, sends instructions, correlation, for
10 interacting with an object to a robot, sends
11 instructions to a robot for executing
12 application based on information stored in
13 the shared robot knowledge base.

14 That's in the abstract.

15 Hickman notes, quote:

16 Information in the shared robot
17 knowledge base is updated based on robot
18 experiences so that any particular robot may
19 benefit from prior experiences of other
20 robots.

21 Hickman discloses, and I go on to
22 talk about the robot experiences, including
23 coaching from humans, that's probably not the
24 only way it gets the information.

25 So, that's, you know, Paragraphs at

1 J. Janet

2 least 151 through 154.

3 Q. Yeah. I mean, you can, please,
4 just give me the list of paragraph numbers
5 and I will move on past this limitation. I'm
6 not trying to belabor this.

7 A. Okay, you have them now.

8 Q. Can you please give me the list of
9 paragraph numbers of your declaration that
10 contain your mapping for the first and second
11 obtaining clauses of claim 4 in Ground 3?

12 MR. COLVIN: Objection. Asked and
13 answered.

14 A. The list isn't exclusive to other
15 paragraphs, but --

16 Q. Okay. Can you give me --

17 A. I just --

18 Q. Can you give me --

19 A. Counsel, you just interrupted
20 again. I just want to make this clear, you
21 just interrupted me again.

22 Q. Sir, you have not been responding
23 to my questions.

24 A. I have totally responded and the
25 transcript will show, I will say the same

1 J. Janet

2 thing again.

3 MR. COLVIN: Let's both just keep
4 this to questions and answers.

5 MR. JAIRAM: I completely agree,
6 Matt. And I think you can see,
7 Matt -- let me withdraw the question.

8 Q. I will ask this question one final
9 time and then I will move on.

10 Can you tell me which paragraph
11 numbers contain your claim mapping for the
12 first and second obtaining clauses of claim 4
13 in Ground 3?

14 MR. COLVIN: Objection. Asked and
15 answered.

16 A. So, I will repeat, and this is not
17 exclusive, but I just listed Paragraphs 151
18 through 154 at least.

19 Q. Any others?

20 A. There might be.

21 Q. Can you respond?

22 A. Sure.

23 Q. I'm giving you a chance to give a
24 complete response.

25 A. Well, I mean, feels like you're

1 J. Janet

2 asking me to exclude other testimony in this
3 declaration by saying that these paragraphs
4 are responsive when, in fact, we both know
5 that there are other paragraphs that are
6 going to probably be responsive as well. So,
7 if you want me to take the time, I can go
8 through and, paragraph by paragraph, say what
9 is still responsive.

10 Q. Are Paragraphs 155 -- well,
11 Paragraph 155 is the only other paragraph for
12 claim 4, so let me rephrase.

13 Is Paragraph 155 of your
14 declaration addressing the first and second
15 obtaining clauses of claim 4?

16 A. Yes, I would include Paragraph 155
17 in that list.

18 Q. Let's look at the next part of
19 claim 4. The first wherein clause:

20 Wherein the knowledge base further
21 includes a fourth correlation including a
22 fourth circumstance representation correlated
23 with a fourth one or more instruction sets
24 for operating the second device.

25 Do you see that limitation in

1 J. Janet

2 claim 4?

3 A. Yes.

4 Q. Are you relying on Grotmol or
5 Hickman or both for this first wherein clause
6 of claim 4?

7 A. (Document review.)

8 Well, my answer would be the same,
9 you must know I'm relying on both references
10 for the same reasons that I stated before.

11 Q. Is it your opinion that Grotmol
12 itself discloses the first wherein clause of
13 claim 4?

14 MR. COLVIN: Objection. Asked and
15 answered.

16 Q. Let me rephrase.

17 For Ground 3, is it your opinion
18 that Grotmol does not contain any differences
19 from the claim language regarding the first
20 wherein clause of claim 4?

21 MR. COLVIN: Objection. Asked and
22 answered.

23 A. I'm not sure. I struggled to
24 follow that question.

25 Q. That's okay. I'll rephrase it.

1 J. Janet

2 Is it your opinion that for your
3 Ground 3 analysis, Grotmol's disclosure has
4 no differences from the claim language of the
5 first wherein clause of claim 4?

6 MR. COLVIN: Objection. Asked and
7 answered.

8 A. I think if you're asking me, do I,
9 as a person of ordinary skill, believe that
10 Grotmol discloses that wherein clause, then
11 the answer is yes.

12 Q. And is it your opinion that Hickman
13 discloses the first wherein clause of
14 claim 4?

15 A. Yes.

16 Q. And to be clear, when I say the
17 first wherein clause of claim 4, I'm
18 referring to wherein the knowledge base
19 further includes a fourth correlation...

20 You are of the opinion that Hickman
21 discloses that limitation?

22 A. Yes.

23 Q. Can you point me to a location in
24 your declaration where you have expressed
25 that opinion?

1 J. Janet

2 A. Paragraphs 151 through 155.

3 Q. Can you be more specific than
4 listing --

5 A. Yes, sir.

6 Q. -- those paragraphs?

7 A. I think that we've gone over this
8 territory quite a bit, it's getting to be a
9 well-worn path, with all due respect. I
10 don't know how to make it more clear that
11 Hickman clearly applies to receiving multiple
12 circumstance representations and instruction
13 sets from multiple robots and propagating
14 those out to multiple robots. So, that's
15 already been summarized, in which case it
16 covers this claim element.

17 I also pointed to Hickman directly.
18 You've got figures, what is it, 5 and 6 where
19 these -- this multitude of circumstance
20 representations and correlated instruction
21 sets reside and are disclosed by Hickman.

22 Q. Can you point me to a specific
23 paragraph where -- of your declaration where
24 you said that Hickman discloses that the
25 knowledge base further includes the claimed

1 J. Janet

2 fourth correlation?

3 MR. COLVIN: Objection. Asked and
4 answered.

5 A. Among other things. Hickman
6 discloses that prior robot experiences
7 include human coaching. Robot experiences
8 including coaching from humans can be used to
9 improve the way that the robots execute. In
10 this situation, they picked out the groceries
11 application, but it could be any application.

12 Q. Which paragraph is that, sir?

13 A. Paragraph 154.

14 Q. In Paragraph 154, where did you
15 discuss correlation?

16 A. The robot experience, which would
17 be what's improved by having the human coach,
18 the human coach provides the robot with a
19 proper correlated response or, again, in the
20 context of the '974 instruction set.

21 Q. Can you show me where the
22 correlated response that you just mentioned
23 is found in that paragraph because it spans
24 three columns, I'm having a hard time finding
25 what you're referring to. It spans three

1 J. Janet

2 columns, are three pages, excuse me?

3 A. What is it that you're saying? Oh,
4 you're saying the paragraph itself spans
5 three pages.

6 Q. Yeah. The paragraph is rather
7 long, Paragraph 154 is three -- it's across
8 three pages. And can you point me to where
9 this correlated response that you mentioned
10 in your preceding response, where is that
11 found in Paragraph 154?

12 A. Well, my preceding response wasn't
13 finished. So, I'm moving on in Paragraph 154
14 to where the human can, quote, coach the
15 robot on how much force to use, which is a
16 correlated response. And then that
17 information is sent back to the cloud
18 processing system with a modified grasping
19 force.

20 So, you have a circumstance which
21 would be found in this -- in this situation
22 grasping articles within the groceries
23 application, where the robot's doing the
24 grasping. And the human is coaching it,
25 which is to say giving it an instruction set

1 J. Janet

2 or refining an instruction set on how much
3 force to use.

4 Q. And where did you explain in your
5 declaration that such coaching by the human
6 is mapped to the fourth correlation of
7 claim 4?

8 MR. COLVIN: Objection. Asked and
9 answered.

10 A. As I mentioned before, these are
11 examples that map to all instances of
12 correlations because they're agnostic to the
13 number of devices or number of robots, I
14 should say. It's -- it's very clear when
15 somebody reads Hickman and Grotmol that we're
16 talking about a multi-agent system and that
17 these capabilities apply to multiple robots.
18 So, in this situation, we're talking about a
19 fourth correlation that occurs on a second
20 device, well, if Hickman and Grotmol already
21 disclose that those that functionality
22 applies to multiple robots, then you have the
23 first and second and fourth.

24 Q. I'm just asking about the fourth
25 correlation. I'm trying to understand your

1 J. Janet

2 mapping for that, Dr. Janet. Let me take a
3 step back.

4 Before the lunch break, we talked
5 about Figure 3 and you mentioned correlation
6 in the context of Figure 3 of Hickman.

7 Do you recall that discussion?

8 A. I remember that there's a provision
9 for correlations. The -- I think I was
10 running off the cuff when I was discussing
11 Figure 3, but, yes.

12 Q. You recall that we were trying --
13 well, I was trying to figure out what is
14 correlated with what for the claim language.
15 I gave the letters X and Y as examples and
16 you were pointing me to something in
17 Figure 3 that could be the X and something
18 else that could be the Y.

19 Do you recall that discussion?

20 A. Yes, I do.

21 Q. And just to be clear, none of that
22 is in your Paragraphs 150 through 155 of your
23 declaration, correct?

24 A. I would not say that's correct.

25 153 to 155, with all due respect, is a

1 J. Janet

2 summary of Hickman and Grotmol. And so, if
3 you're asking for, you know, I guess
4 additional details on this, then they can be
5 readily found, they're proudly on display and
6 articulated within Hickman. And, you know,
7 as part of this deposition, I'm happy to
8 elaborate.

9 Q. Do you recall that you testified
10 before the lunch break that with respect to
11 Figure 3 of Hickman, what I called X being
12 correlated with Y. He says variable for N
13 notation.

14 You mentioned that the object of
15 either data knowledge base 307, 308 or 310 or
16 some vector regarding those objects is
17 correlated with what I called Y, which you
18 said could be the task ID or the instruction
19 labeled as part of knowledge base 309.

20 Do you recall that?

21 A. It could be. Go ahead. What were
22 you saying?

23 Q. Do you recall that?

24 A. Pardon me.

25 Q. Do you recall that, sir?

1 J. Janet

2 A. I recall saying it could be. The
3 application, again, if I'm remembering
4 correctly, Figure 3's detailed description,
5 and I could be off on, you know, a minor
6 detail or a detail in general, but if I'm not
7 mistaken, the application knowledge base
8 plays the role as well in gluing together
9 which pieces of these repositories, for lack
10 of a better word, but I think I was referring
11 to 307, 308, 310, excuse me, and perhaps
12 others, would be paired with, among other
13 things, or what could be task knowledge base
14 309.

15 But I believe that Figure 3 is a
16 little bit more complicated than is being
17 summarized right now.

18 Q. You didn't cite Figure 3 of Hickman
19 in claim 4 for Ground 3, did you?

20 A. I don't see where I cited Figure 3
21 in Paragraphs 151 through 155, not
22 explicitly.

23 Q. You believe you implicitly or
24 somehow otherwise then explicitly cited
25 Figure 3 of Hickman for claim 3 -- in claim 4

1 J. Janet

2 in Ground 3?

3 A. Well, it's part of the reference.

4 I feel that the summaries provided in

5 Paragraphs 151 through 155 and the citations

6 that support them including the, you know, by

7 reference, the relevant upstream components

8 or elements to support the summaries or

9 support the citations in the summaries, I

10 should say.

11 Q. Let's go on to the next claim

12 element of claim 4.

13 Wherein the fourth circumstance

14 representation represents a fourth

15 circumstance detected at least in part by the

16 one or more sensors of the second device.

17 Do you see that portion of claim 4

18 which I have highlighted on --

19 A. Yes, I see that.

20 Q. -- on the screen?

21 Are you relying on Grotmol or

22 Hickman or both or that limitation in claim 4

23 in Ground 3?

24 MR. COLVIN: Objection. Asked and

25 answered.

1 J. Janet

2 A. As I sit here today, I believe both
3 Grotmol and Hickman disclose that.

4 Q. Okay. And can you point me to a
5 location in your Paragraph 150 through 155
6 which are all the paragraphs for claim 4
7 somewhere where you addressed this
8 limitation?

9 A. (Document review.)

10 So, to start with Grotmol, and we
11 can back up to get more details about that,
12 but at the bottom of Paragraph 150, I state
13 that a POSITA would've understood Grotmol to
14 disclose first, second, third, fourth, et
15 cetera, correlations where each correlation
16 includes a circumstance representation
17 correlated with an instruction for operating
18 the robotic device. Prior to that, I mention
19 that Grotmol discloses that multiple images,
20 which would be a circumstance representation,
21 may be acquired with images respectively
22 stored in association with corresponding
23 motor commands, which would be your
24 instruction sets at the time of -- that the
25 image was acquired.

1 J. Janet

2 The -- that is in part as it
3 relates to Grotmol. It's not -- it's not
4 really limited to a first or a second, but it
5 allows for it to be somewhat iteration or
6 device agnostic as it relates to --

7 Q. Sorry, I thought you were done
8 speaking.

9 A. Well, you asked me about both
10 Grotmol and Hickman or did you just ask me
11 about one of them?

12 Q. Please continue.

13 A. (Document review.)

14 I go on to say that both of them
15 include a fourth correlation which includes
16 circumstance representation detected by
17 sensors of the second device correlated with
18 an instruction set for operating that second
19 device.

20 Q. Where do you say that, sir?

21 A. Paragraph 151.

22 Q. I think that that sentence says the
23 combination of Grotmol and Hickman renders --

24 A. Correct.

25 Q. -- obvious the limitation.

1 J. Janet

2 I'm asking, is it your opinion that
3 Hickman discloses that limitation?

4 A. Yeah, so I'm getting to that.

5 Q. Okay.

6 A. And then Hickman discloses
7 Paragraph 154, among other places, a shared
8 robot knowledge base for use with cloud
9 competing systems, collects data from a robot
10 about an object the robot has encountered,
11 could be a circumstance representation, in
12 its environment and stores the received data
13 in the shared robot knowledge base, sends
14 instructions, should be instruction, set for
15 interacting with an object, instructions to a
16 robot for executing an application based on
17 information stored in the shared robot
18 knowledge base. Excuse me.

19 Going on. And this is, I think
20 probably -- I think it would help the reader
21 know that there's broad mapping here, but,
22 you know, Hickman notes that information in
23 the shared robot knowledge bases updated
24 based on robot experience so that any
25 particular robot may benefit from prior

1 J. Janet

2 experiences of other robots.

3 Q. And what does that have to do with
4 the specific claim limitation that I
5 highlighted, wherein the fourth circumstance
6 representation represents a fourth
7 circumstance detected at least in part by the
8 one or more sensors of the second device?

9 A. Well, I think it has everything to
10 do with it. It's talking about how, you
11 know, Hickman makes clear that there are
12 other robots in this system or that
13 contribute to this knowledge base and they
14 provide or receive circumstance
15 representations. And, you know, any other
16 robot could be a second device, if you will.
17 And that second device, that second robot,
18 its sensors can be, per this, what provides
19 the circumstance representation image. It
20 can be, you know, audio like what Grotmol
21 describes, you know, some sort of an on/off
22 type of signal or binary signal. But the
23 fact that any robot may benefit from prior
24 experiences of other robots that means that
25 there are other robots that are perceiving

1 J. Janet

2 the environment and contributing to this
3 knowledge base. They're doing the detecting
4 of the circumstances, I guess is what I'm
5 trying to say.

6 Q. Is it referring to -- is the
7 sentence that you quoted information in the
8 shared robot knowledge bases is updated... is
9 that referring to the fourth circumstance
10 representation that is claimed or is it also
11 referring to the third circumstance
12 representation or the second, or the first?

13 Can you please explain?

14 A. I'm going to do my best to explain
15 this again. The fact that we're dealing with
16 multiple robots and Hickman just happens to
17 have this prior experiences of other robots
18 means that I can, at random, pick from that
19 cloud of other robots, which one would be
20 one, which one would be two and which one
21 would be four. And so -- sorry, were you
22 saying something?

23 Q. The claim specifically recites
24 several different circumstance
25 representations, that's why I'm trying to be

1 J. Janet
2 precise, since you have said that Hickman
3 discloses everything in claim 4, I'm trying
4 to understand, if you are saying that the
5 same sentence in Hickman that you are
6 pointing to for this fourth circumstance
7 representation, is that the same sentence
8 that you're also relying on for the first
9 circumstance representation and the second
10 circumstance representation?
11 MR. COLVIN: Objection. Asked and
12 answered.
13 A. It discloses that and I'll repeat.
14 Hickman describes that you have this
15 multitude of other robots that are providing
16 experiences and those experiences include
17 perceiving the world, which is to say getting
18 circumstance representations unique to the
19 sensor suite they have on board, getting
20 instructions, so, for example, from the human
21 coaches, and then passing that information
22 back. If I have even three or four robots
23 that comprise these other robots, certainly
24 within them I would have a fourth
25 circumstance perceived by the sensor suite of

1 J. Janet

2 a second robot.

3 Q. And are you relying on that same
4 disclosure or sentence of Hickman also for
5 the claimed first circumstance representation
6 and second circumstance representation of
7 claim 4?

8 A. As I mentioned, these other robots
9 were all the robots within the Hickman
10 system. Pick one. That's your first, pick a
11 second one, that's your second. Pick a
12 second device and get another sensor reading
13 from it, that could be your fourth.

14 So, I think that, you know, that in
15 that you have your answer. Hickman just, you
16 know, doesn't belabor the how do I -- if I'm
17 saying I got a group of robots that are
18 collecting information about their
19 environment and then learning from human
20 coaches, they are each doing the same thing
21 that is described in '974, it just doesn't go
22 into such unique vernacular, first of all.
23 And second of all, minute slow motion of
24 what's happening. It's explaining, it's
25 disclosing to a sufficient degree that a

1 J. Janet
2 person of ordinary skill would absolutely
3 understand that you're talking about multiple
4 robots that gather circumstance
5 representations and get from their human
6 coaches, perhaps other sources the
7 instruction sets. So, then if you want to
8 put a label on that, one, two, four, 200,
9 5,000, you can do that.

10 Q. Okay. So, just to be clear, the
11 sentence from the abstract of Hickman that
12 we've been discussing that mentions
13 information in the shared knowledge bases is
14 updated... that sentence is relied upon in
15 your declaration for the first circumstance
16 representation, correct, for claim 4 in
17 Ground 3?

18 A. It's in part what's relied upon,
19 yes.

20 Q. And that sentence is also relied
21 upon for the claimed second circumstance
22 representation of claim 4 in Ground 3,
23 correct?

24 A. Yes.

25 Q. And that sentence is also relied

1 J. Janet

2 upon for the claimed fourth circumstance
3 representation in claim 4 in Ground 3,
4 correct?

5 A. Yes. And, you know, just to help
6 drive this home, if you look at the bottom of
7 Paragraph 154, again, the second robot has in
8 effect learned from the experience of the
9 earlier robot, the earlier robot may have
10 been, you know, recognizing that there are
11 robots plural in this system, just like there
12 are in it Grotmol's system, that earlier
13 robot could have been robot one, two, four,
14 500, a thousand.

15 So, yes, it -- it gives to the
16 person of ordinary skill an understanding
17 that you can have robots no matter how you
18 label them, that perceive the world, get
19 their circumstance representations and get
20 their instruction sets, at least in part,
21 from a human coach, and then pass that
22 information back to some knowledge base or to
23 each other, which would basically be your
24 knowledge base.

25 Q. The last clause of claim 4, it's a

1 J. Janet

2 wherein clause:

3 Wherein at least a portion of the
4 fourth correlation is learned in another
5 learning process that includes:... Some text
6 is there.

7 You see that portion of claim 4?

8 A. Yes.

9 Q. I've highlighted it and for
10 convenience, I'll just refer to it as the
11 final wherein clause of claim 4.

12 We talked about this wherein clause
13 earlier today.

14 Do you recall that discussion?

15 A. Yes.

16 Q. Is it your opinion that Grotmol
17 discloses this final wherein clause,
18 Hickman discloses -- strike it, let me
19 rephrase.

20 For Ground 3 in claim 4, in your
21 declaration, did you rely upon Grotmol or
22 Hickman or both for the final wherein clause
23 of claim 4?

24 A. Well, as I mentioned before, I
25 relied -- I believe that both disclosed this.

1 J. Janet

2 Q. Can you point me to where in your
3 declaration by -- let's go to a specific
4 paragraph, please. Where did you address a
5 portion of the fourth correlation is learned
6 in another learning process as disclosed by
7 Hickman?

8 A. I'm sorry, say that again. So, you
9 just want to focus on Hickman?

10 Q. Yes, sir. I want to focus on
11 Hickman.

12 Can you point me to where in your
13 declaration for Ground 3 regarding claim 4
14 did you address Hickman's disclosure of the
15 final wherein clause of claim 4 about the
16 fourth correlation learned in another
17 learning process?

18 A. I think my go-to on this is
19 probably -- it's just best to just stick to
20 what's simple here, but the entirety of
21 Paragraphs 151 through 155 have a generic
22 utility here. But if it helps, I'll explain
23 the same thing again. The -- one of the last
24 sentences in 154 on page 114 says that again
25 any particular robot may benefit from prior

1 J. Janet
2 experiences of other robots. That means that
3 these other robots are learning a correlation
4 through a different -- another process, if
5 you will, which would include generating and
6 receiving this fourth circumstance, again,
7 the numbering is somewhat arbitrary because
8 it could be 50, it could be a hundred, and
9 obtaining or receiving the fourth one or more
10 instruction sets, for example, from human
11 coaches for operating the second device.
12 Pick any one of the other robots and that is
13 a second device.

14 Q. Is there someplace that you
15 specifically addressed the claim phrase
16 "another learning process" in your claim 4
17 analysis in Ground 3?

18 A. I'm going to go back to the same
19 quote and still say that this is explained in
20 Paragraphs 151 through 155. But the fact
21 that these other robots have these
22 experiences, then that is -- that includes
23 them learning.

24 Q. What is your understanding of
25 another learning process as you applied that

1 J. Janet

2 phrase to your prior art analysis?

3 A. I don't know that its limited to
4 this, but another learning process would be
5 or would include a -- maybe a circumstance
6 that's unique and either adapting an
7 instruction set to a new or a refined more
8 pertinent instruction set or arriving at a
9 new one again.

10 If you're in a grocery store, if
11 I'm picking up an apple, that's one learning
12 process. If I have a different human coach,
13 that's probably another learning process. If
14 I'm picking up a watermelon, that's probably
15 a different learning process. And again, if
16 I have a different human coach for that, that
17 would most likely be a different learning
18 process. I think that it's a -- there are
19 probably more ways to interpret that, but
20 it's one of the ways that I see it.

21 Q. Did you see it another way, did you
22 address it in another way in your
23 declaration?

24 A. I'd have to look for examples of
25 how I might have addressed it a different

1 J. Janet

2 way, but I think it -- I think it's an
3 inclusive, broadly inclusive type of
4 statement because a learning process there
5 are many, many, many of those. Bottom line
6 is, are you arriving at a correlated
7 instruction set for the circumstance that you
8 perceive? Excuse me a second.

9 Q. When you say the circumstance you
10 perceive, again, in the context of the claim
11 mapping that you did, you're referring to an
12 image that you perceive; is that correct?

13 A. An image would be included in that,
14 but there are lots of other things that can
15 be included in that. As I mentioned, Grotmol
16 includes audio and binary switches and
17 Hickman, I'd have to go back and check, but
18 likely includes other -- other means of
19 representing circumstances, but images are
20 included in that, yes, sir.

21 Q. Okay.

22 MR. JAIRAM: Why don't we take a
23 break. Let's go off the record.

24 THE COURT REPORTER: We're off the
25 record.

1 J. Janet

2 (Recess from 3:00 p.m. to

3 3:10 p.m.)

4 THE COURT REPORTER: We're back on
5 the record.

6 BY MR. JAIRAM:

7 Q. Okay. If we can please turn to
8 Paragraph 156 of your declaration, Dr. Janet.
9 And let me know when you are there.

10 A. I am there.

11 Q. I'm going to share the declaration
12 on the screen so you can see it and you'll
13 see that the text of claim 11 is written out
14 in the section heading before Paragraph 156.

15 Do you see that?

16 A. Yes, I do.

17 Q. Okay. And I'll go through the text
18 of this with respect to the claim mapping and
19 pardon if it seems somewhat repetitive, but
20 since it's a different claim, I need to
21 understand your mapping and whether there are
22 any differences with respect to the other
23 claims and mappings.

24 Do you understand?

25 A. Yes, I believe so.

1 J. Janet

2 Q. For claim 11, you have addressed
3 that claim in two grounds of your declaration
4 Ground 2 and Ground 3, correct?

5 A. You're asking about claim 11?

6 Q. Yes, sir.

7 A. And what about Grounds 2 and 3?

8 Q. I'm just mentioning that they are
9 both addressing claim 11 of the '974 Patent?

10 A. That's true.

11 Q. Okay. And we discussed claim 11 in
12 the single reference obviousness Ground 2
13 earlier today.

14 You recall that?

15 A. Yes, I do.

16 Q. And now we will talk about Ground 3
17 which is the obviousness in view of Grotmol
18 and Hickman, are okay?

19 A. Yes, sir.

20 Q. Okay. So, turning to
21 Paragraph 156, which is the first paragraph
22 of your claim 11 analysis, can you tell me if
23 any of the features, that is, any of the
24 claimed phrases in claim 11 are addressed by
25 Hickman to supplement some deficiency of

1 J. Janet

2 Grotmol in Ground 3?

3 A. (Document review.)

4 Well, as I mentioned before, I
5 don't really feel that -- and I'm sure that a
6 person of ordinary skill with enough time
7 reviewing Grotmol has this deficiency. I
8 think that as I've articulated before,
9 Hickman adds a -- maybe another way of
10 explaining it, arriving at the same result,
11 which is that you can have, you know, in this
12 situation a forth correlation with its own
13 fourth circumstance representation and
14 correlated instruction set, fourth
15 circumstance representation represents -- I
16 mean, representing this circumstance
17 perceived by or detected at least in part by
18 sensors on the second device. And at least a
19 portion of the correlation is learned in
20 another learning process that includes
21 operating the second device.

22 So, you know, I'm happy to go back
23 over that, but I don't really feel that
24 Grotmol is deficient there. I think that
25 Hickman has a different way of explaining it

1 J. Janet

2 that may or may not help the reader.

3 Q. Okay. And for the analysis that
4 you did regarding claim 11 in Ground 3, did
5 you analyze any differences between the base
6 reference Grotmol and the claim language?

7 A. (Document review.)

8 I feel like my answer is gonna be
9 the same here. I didn't really -- didn't
10 really see differences. What I saw were
11 perhaps different ways of articulating how
12 limitations were met from the two different
13 references the fact that Grotmol cited to
14 Hicks -- I'm sorry, Hickman means that
15 Grotmol was fully aware and it directed the
16 reader, like any person of ordinary skill
17 should do as -- to trace at least relevant
18 citations, but I just didn't really feel like
19 there was a void. I think there was -- there
20 was a complement and I think that that
21 complement would help the audience better
22 understand that even if there's a perceived
23 deficiency, it is overcome or cured by the
24 combination.

25 Q. In your analysis of claim 11, I see

1 J. Janet

2 that there is two paragraphs, 156 and 157,
3 right?

4 A. Yes, sir.

5 Q. You cite back to your -- let me
6 withdraw that question.

7 In Paragraph 156, you cite back to
8 your analysis of claim 4 in Ground 3
9 regarding Hickman's disclosure.

10 Do you see that in the middle of
11 the paragraph?

12 A. Yes, that Hickman discloses that
13 humans, plural, can coach the various robots?

14 Q. Yes.

15 A. Yes.

16 Q. Is there any pertinent difference
17 in your analysis regarding that disclosure of
18 Hickman about the human coaching robots
19 different than the analysis that you
20 presented for claim 4 in Ground 3?

21 A. I think that there really isn't
22 because the word "humans" is pluralized. If
23 you look at that citation, which I think I
24 have in my analysis regarding claim 4, it's
25 23, 36 to 48, robot experiences including

1 J. Janet

2 coaching from humans, humans plural. So --
3 excuse me. The way that it's addressed is
4 similar. Could be one human, could be
5 multiple humans.

6 Q. You see that these last clause of
7 claim 11, which I will highlight now, I'll
8 just read it out loud for the record:

9 Wherein at least a portion of the
10 fourth correlation is learned in another
11 learning process that includes operating the
12 second device at least partially by another
13 user.

14 Do you see that?

15 A. Yes, I do.

16 Q. Do you see that that limitation is
17 not in claim 4?

18 A. I'm sorry, say that again.

19 Q. Do you see that this limitation,
20 which I've highlighted which is the final
21 wherein clause of claim 11 --

22 A. Right.

23 Q. -- is not in claim 4?

24 A. Right. So, in it claim 4 -- let me
25 clarify.

1 J. Janet

2 I talk about robot experiences
3 including coaching from humans and those
4 robot experiences are how, with regards to
5 claim 4, there is a, for lack of a better way
6 of phrasing, a new correlation, something --
7 a new learning process.

8 The -- in claim 11, it spells out,
9 if I'm summarizing properly that now that
10 there's a separate user that's involved with
11 that, I am relying on, among other things, a
12 similar excerpt. One, being pertinent to the
13 different experiences, the other one being
14 pertinent to the fact that you have different
15 users.

16 Q. Okay. And what part of Hickman,
17 perhaps if I call them in line number or
18 figure, what part of Hickman are you pointing
19 to for the claimed at least partially by
20 another user at the end of claim 11 in
21 Ground 3?

22 A. Well, in Paragraph 156, I cite to
23 Hickman, Column 23, lines 36 through 48,
24 Column 26, lines 21 through 27 and I'm not
25 sure what that dangler -- oh, I'm sorry. 26,

1 J. Janet

2 21 -- 26 -- Column 26, line 21 through
3 Column 27, line 21. Sorry. Got a little
4 mixed up in my notation there.

5 Q. Yeah. And I see --

6 A. Go ahead.

7 Q. -- that those passages are kind of
8 written out in full in your claim 4 write-up,
9 so feel free to go back to there to see the
10 actual text of Hickman. Perhaps we can take
11 the first of those passages that you cited.

12 You mentioned Hickman Column 23,
13 line 36 to 48. You'll see that you appear to
14 have written that out in full on page 114 at
15 the bottom of your declaration. So, where in
16 that passage does Hickman disclose a portion
17 of the fourth correlation is learned in
18 another learning process that includes
19 operating the second device at least
20 partially by another user?

21 And I'm focusing here on the
22 other -- another user aspect of that
23 limitation.

24 A. Right. Well, I think that the part
25 to focus on the most, but not to say it's the

1 J. Janet

2 only relevant aspect to that is the:

3 In this manner, robot experiences,
4 parenthesis, including "coaching" from
5 humans, plural, can be used to improve the
6 way the robots execute, in this situation,
7 the groceries application.

8 But there's a pool of humans and,
9 which again, you know, a person of ordinary
10 skill would understand that one human may not
11 necessarily be dedicated to a particular
12 robot or be dedicated to a particular
13 application.

14 And -- but anyway, it's the fact
15 that humans are pluralized here, among other
16 things, but I think that's a big one.

17 Q. Okay. So, I've highlighted the
18 sentence that you just now were referring to,
19 the end of the passage that's 23: 36 to 48
20 of Hickman. And the coaching from humans,
21 what is the second device being mapped to
22 because the claim language also says
23 "operating the second device at least
24 partially by another user."

25 So, regarding this sentence that

1 J. Janet

2 you mentioned, what are you mapping to the
3 second device?

4 A. Just above that quote on line
5 141 -- sorry, on page 114 is this familiar
6 quote that information is shared robot
7 knowledge bases is updated based on robot
8 experiences so that any particular robot may
9 benefit from prior experiences of other
10 robots. So, now we've got a pool of robots
11 and a pool of users or humans.

12 Q. Are you referring to the --

13 A. So, if you just pick any one of the
14 other robots, that's your second.

15 Q. Are you referring to a passage from
16 the abstract of Hickman?

17 A. Here I am, yes.

18 Q. Did you refer to that passage or
19 cite that passage in your analysis of
20 claim 11?

21 A. By reference at a minimum. I say,
22 as I discussed above with respect to claim 4,
23 so included by reference.

24 Q. Okay. You incorporated "by
25 reference" your analysis from above?

1 J. Janet

2 A. That was my intent, yes, sir.

3 Q. Okay. But then you listed out to
4 specific other passages, right?

5 A. Say that again, please.

6 Q. But then you listed specifically
7 two other citations to Hickman in your
8 claim 11 analysis in Paragraph 156; is that
9 correct?

10 A. Yeah. The emphasis being more on
11 the fact that there are multiple humans, it's
12 pluralized. But, yeah, my intent was to
13 include by reference.

14 Q. And in the start of Paragraph 157
15 of your declaration, you mention that the
16 combination of Grotmol and Hickman discloses
17 a shared knowledge base with any number of
18 correlations, right?

19 A. It does. It pluralizes -- it
20 really -- from my perspective of a person of
21 ordinary skill, I don't see where it limits
22 the number of correlations.

23 Q. Okay. And the correlation is
24 between a circumstance representation and an
25 instruction set, right?

1 J. Janet

2 A. An associated instruction set, yes,
3 sir.

4 Q. And is that between a circumstance
5 representation of Grotmol, which I believe
6 you said is an image in Grotmol, or are you
7 referring to a circumstance representation of
8 Hickman?

9 A. Well, first, as I mentioned before,
10 Grotmol, in my opinion, is not limited to
11 images, but images can be circumstance
12 representations. Grotmol references audio,
13 references binary type of devices or
14 feedback, sensory feedback. There are
15 several things that Grotmol covers, but
16 included in circumstance representation would
17 be images.

18 Q. And does Hickman disclose the
19 non-image circumstance representations that
20 you are just now referring to?

21 A. I'm happy to look through there.
22 Off the top of my head, I would say yes,
23 because even if you just look at one
24 application that was front and center, which
25 is this fetch application. The fact that it

1 J. Janet

2 crushed a cup and then could be remedied by a
3 human coach to not crush that cup means that
4 it's most likely using image processing to
5 recognize the cup. But also some sort of
6 tactile sensor to recognize some forced
7 torque type of sensor which would be very,
8 very common, I would almost say for a robot
9 that interacts with the environment in the
10 real world, necessary to have some additional
11 sensors like force and torque.

12 Q. Claim 11 has three wherein clauses,
13 do you see them?

14 A. Yes.

15 Q. And we just finished discussing the
16 third wherein clause, right?

17 I'm sorry, I didn't hear you?

18 A. I'm sorry, I was thinking.

19 Q. And the first two wherein clauses
20 are the same as in claim 4, right?

21 A. Pretty close if not identical, if
22 I'm remembering correctly.

23 Q. And your analysis for those first
24 two wherein clauses of claim 11 in Ground 3
25 is the same as your analysis for those

1 J. Janet

2 clauses in claim 4 in Ground 3; is that
3 right?

4 A. I'm sorry, I was focusing on --
5 could you ask that question again.

6 Q. Is your analysis of the first two
7 wherein clauses of claim 11 in Ground 3 the
8 same as your analysis of those corresponding
9 clauses found in claim 4 in Ground 3?

10 A. If I understand your question
11 correctly, I believe yes.

12 Q. I want to make sure you understand
13 my question correctly, so please tell me if
14 there's something you don't understand about
15 the question. Would you like me to rephrase
16 the question?

17 A. Well, if I -- let me just try and
18 pose it back to you.

19 Q. I would just suggest posing a
20 question to me would kind of make the
21 deposition transcript kind of awkward. Let
22 me try rephrasing the question.

23 For the first two wherein clauses
24 of claim 11 in Ground 3, is your mapping and
25 analysis with respect to the prior art

1 J. Janet

2 references the same as the mapping and
3 analysis that you did for those clauses as
4 found in claim 4 in Ground 3?

5 A. (Document review.)

6 Yes, I believe so. And again, I
7 would point to the same, what I call, go-to
8 is that any particular robot may benefit from
9 prior experiences of other robots, and I
10 elaborate with how those experiences are
11 derived. They are perceiving the
12 circumstantial representations and being
13 coached by humans to arrive at the
14 instruction sets. And since there's a
15 multitude of robots including, quote/unquote,
16 other robots, I believe that those first two
17 whereins from my analysis in claim 4 apply to
18 my analysis of claim 11.

19 Q. Okay.

20 MR. JAIRAM: I think we've been
21 going for about 40 minutes. Why don't
22 we take a break right there. Let's go
23 off the record.

24 THE COURT REPORTER: We're off the
25 record.

1 J. Janet

2 (Recess from 3:39 p.m. to

3 3:45 p.m.)

4 THE COURT REPORTER: We're back on
5 the record.

6 MR. JAIRAM: I have no further
7 questions of this cross-examination of
8 Dr. Janet.

9 Your witness, Matt.

10 MR. COLVIN: Thanks. No questions
11 here. We can be done.

12 MR. JAIRAM: Okay, we're done.
13 Let's go off the record.

14 THE COURT REPORTER: We're off the
15 record.

16 (Time noted: 3:46 p.m. Eastern Time)

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1 J. Janet

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3 J U R A T

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5

6 I, JASON ANDRE JANET, do hereby
7 certify under penalty of perjury that
8 I have read the foregoing transcript
9 of my deposition taken on FEBRUARY 28,
10 2024; that I have made such
11 corrections as appear noted herein in
12 ink, initialed by me; that my
13 testimony as contained herein, as
14 corrected, is true and correct.

15

16

17 _____
JASON ANDRE JANET

18

19 Subscribed and sworn to before me

20 This _____ day of _____, 20__.

21

22 _____
NOTARY PUBLIC

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J. Janet

-----I N D E X-----

WITNESS: JASON ANDRE JANET

EXAMINATION BY:	PAGE
MR. JAIRAM	4

-----E X H I B I T S-----

NUMBER	DESCRIPTION	PAGE
Exhibit 1001	'974 Patent	4
Exhibit 1002	Declaration of Jason Janet	4
Exhibit 1004	Grotmol Reference	4
Exhibit 1005	Hickman Reference	4

*Exhibits retained by counsel

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J. Janet

C E R T I F I C A T E

STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

I, CANDIDA BORRIELLO, a Notary
Public for and within the State of New York,
do hereby certify:

That the witness, JASON ANDRE JANET,
whose examination is hereinbefore set forth
was duly sworn and that such examination is a
true record of the testimony given by that
witness.

I further certify that I am not
related to any of the parties to this action
by blood or by marriage and that I am in no
way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 4th day of March, 2024.

Candida Borriello

CANDIDA BORRIELLO

1	J. Janet				
2	ERRATA SHEET FOR THE TRANSCRIPT OF:				
3	Case Name:	TESLA v. AUTONOMOUS			
	Dep. Date:	FEBRUARY 28, 2024			
4	Deponent:	JASON ANDRE JANET			
5	Pg. Ln.	Now Reads	Should Read	Reason	
6	_____	_____	_____	_____	
7	_____	_____	_____	_____	
8	_____	_____	_____	_____	
9	_____	_____	_____	_____	
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18	_____	_____	_____	_____	
19	_____	_____	_____	_____	
20	_____ JASON ANDRE JANET				
21	SUBSCRIBED AND SWORN BEFORE ME,				
22	This____ day of_____, 20__.				
23	_____				
24	Notary Public				
25	My Commission Expires:_____				

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