

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. IPR2023-01169
U.S. Patent No. 10,607,134

DEPOSITION

OF

JASON ANDRE JANET, PH.D.

TUESDAY, MARCH 19, 2024

HELD REMOTELY

Reported by:
CANDIDA BORRIELLO
JOB NO. 6555560-001

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

DATE: March 19, 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.

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

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

Appearing on Behalf of the Petitioner:

FISH & RICHARDSON P.C.
1717 Main Street
Suite 5000
Dallas, Texas 75201
(214) 292-4013
BY: MATTHEW COLVIN, ESQ.
GRETCHEN A. DeVRIES, PH.D.
EMAIL: colvin@fr.com
devries@mckoolsmith.com

Appearing on Behalf of the Patent Owner

MCKOOL SMITH
1999 K Street, NW
Washington, DC 20006
(202) 370-8324
BY: ARVIND JAIRAM, ESQ.
STUART McCOMMAS, ESQ.
EMAIL: ajairam@mckoolsmith.com
smccommas@mckoolsmith.com

1 J. Janet

2 THE COURT REPORTER: We're on the
3 record.

4 J A S O N J A N E T,
5 called as a witness, having been
6 duly sworn by a Notary Public,
7 was examined and testified as
8 follows:

9 EXAMINATION BY
10 MR. JAIRAM:

11 Q. Good morning, sir.

12 A. Good morning.

13 Q. Can you please state and spell your
14 full name for the record?

15 A. Yes. My full name is Jason Andre
16 Janet, spelled J-A-S-O-N, A-N-D-R-E,
17 J-A-N-E-T.

18 Q. Before we begin, I want to remind
19 you of some basic ground rules. And I know
20 that we have conducted some depositions
21 recently that you were in, but I still want
22 to remind you of some ground rules for the
23 sake of completeness.

24 You understand you've been placed
25 under oath today just as though you were in

1 J. Janet

2 court?

3 A. Yes.

4 Q. You understand that you're bound to
5 answer my questions truthfully today?

6 A. Yes.

7 Q. If a question is unclear, please
8 let me know so that I may rephrase as
9 necessary, otherwise I'll assume you
10 understood my question; is that okay?

11 A. That's okay.

12 Q. Because your testimony is being
13 transcribed by the court reporter, please
14 answer your questions verbally instead of
15 gestures, okay?

16 A. Yes, sir.

17 Q. Are there any medications that
18 you're taking that would prevent you from
19 providing honest, accurate and complete
20 answers?

21 A. No, sir.

22 Q. Or any health conditions that would
23 prevent you from providing honest, accurate
24 and complete answers?

25 A. No, sir.

1 J. Janet

2 Q. Are you aware of any other reason
3 that you might not be able to answer my
4 questions in an honest, accurate and complete
5 manner?

6 A. No, sir.

7 Q. I would like to caution you not to
8 discuss the substance of your testimony
9 during your breaks during this deposition; is
10 that okay?

11 A. Yes, sir.

12 Q. Dr. Janet, is there anyone in the
13 room with you today?

14 A. No.

15 Q. Do you have any documents with you
16 in the room today, either electronic or hard
17 copy?

18 A. Not related to this case.

19 Q. I will be asking questions
20 regarding certain documents, I have provided
21 four of those documents, Exhibits 1001, 1003,
22 1005 and 1006 of IPR2023-01169 in the chat
23 window.

24 Have you been able to download
25 them?

1 J. Janet

2 A. Yes, it appears that I've been able
3 to download them.

4 Q. Okay. And you understand that the
5 deposition here today is IPR2023-01169
6 regarding US patent number 10,607,134, do you
7 understand that.

8 A. Yes, sir.

9 Q. I will refer to the patent that I
10 just mentioned as the '134 patent and I may
11 mention this present IPR as the '134 IPR for
12 convenience, okay?

13 A. Yes, sir.

14 Q. And we conducted your deposition a
15 few weeks ago regarding some other IPRs, and
16 if for any reason we need to mention those, I
17 will make sure to clarify which IPR or which
18 patent I'm referring to. And if you have any
19 questions about which patent or which IPR is
20 being asked about, will you please ask for
21 clarification?

22 A. I will.

23 (Exhibit 1003, Declaration of
24 Jason Janet, was introduced.)

25 BY MR. JAIRAM:

1 J. Janet

2 Q. Dr. Janet, Exhibit 1003 in this
3 '134 IPR is your declaration, correct?

4 A. Yes, sir.

5 Q. Do you have the electronic copy of
6 that declaration, Exhibit 1003 with you?

7 A. Yes.

8 Q. And does the Exhibit 1003 that you
9 have with you appear to be a complete and
10 accurate copy of the declaration that you
11 submitted?

12 A. It appears to be.

13 Q. Who wrote the declaration,
14 Exhibit 1003?

15 A. I wrote that.

16 Q. Are you aware of any errors in your
17 declaration that you wish to correct on the
18 record here?

19 A. There are a couple of things that
20 I, if memory serves me, would like to maybe
21 correct. They're not -- they don't really
22 relate to the substance of my opinions,
23 but... So, for example, let's see, on
24 page -- let's see here, 179 in my table where
25 I discuss the -- basically summarize Claim 4,

1 J. Janet

2 there's a statement that says after a comma,
3 "Where the third correlation includes at
4 third object representations," that should be
5 "a third object representation or
6 representations".

7 Page 182, same thing, after the
8 comma, I guess it's the second comma, "The
9 third correlation includes at third object
10 representations," that should read "The third
11 correlation includes a third object
12 representations".

13 Page 183, similar, after the second
14 comma, "The third correlation includes at
15 third object representations," that should
16 read "The third correlation includes a third
17 object representations".

18 And in that same grouping,
19 page 184, after the second comma, "The
20 third correlation includes at third object
21 representation," should read "The third
22 correlation includes a third object
23 representations".

24 Also, page 235, Paragraph 286, when
25 I'm addressing Claim 10, the last, I guess,

1 J. Janet

2 sentence of that Paragraph 286 just above the
3 table it says:

4 My analysis above explaining how
5 Thomas discloses the limitations of Claim 1
6 applies to the limitations of Claim 19 as set
7 forth in the chart below.

8 That should read: Claim 10.

9 And then in -- I believe it was a
10 patent that was dropped, but in the
11 discussion about I believe it's '585.

12 Q. If I could just interrupt you
13 there. We can skip discussion about the '585
14 because that's not at issue in today's IPR.
15 I just want to save you some time but please
16 continue.

17 A. No, I understand. It's just in
18 there I make reference to Patent '134 and I
19 didn't mean to. So, it's somewhere in there
20 I believe where I'm discussing Claim 16 of
21 the '585. So, I just want to make sure that
22 where I think I'm pointing to something
23 related to patent '134, I didn't mean to in
24 that section.

25 Q. Sure. Anything else, you know, I

1 J. Janet

2 guess apart from typographical errors, you
3 know, like the type that you mentioned, I'm
4 aware that there may be other typographical
5 errors, but I'm asking about anything
6 substantive that you wish to note.

7 A. No, nothing substantive.

8 Q. Okay. I want to understand the
9 nature of your analysis in your declaration
10 and specifically the prior art references
11 that you are analyzing.

12 Can you tell me which prior art
13 references you have analyzed for the prior
14 art mappings of the claims in this IPR?

15 A. Well, the prior art references that
16 I map to the claims in the '134 are from
17 Thomas and Buehler.

18 (Exhibit 1005, Grotmol Reference,
19 was introduced.)

20 (Exhibit 1006, Buehler Reference,
21 was introduced.)

22 BY MR. JAIRAM:

23 Q. Do you have copies of Thomas
24 Exhibit 1005 and Buehler Exhibit 1006 with
25 you?

1 J. Janet

2 A. Yes.

3 Q. Let's take a look at Thomas,
4 please, if you can please pull up
5 Exhibit 1005. Let me know when you've got
6 it.

7 A. I have it.

8 Q. I guess we can start by talking
9 about the -- about the figure that's shown
10 on the cover of Thomas, I believe that's
11 Figure 5. But since it's shown on the cover,
12 let's just start by talking about what Thomas
13 is doing with respect to this figure.

14 Can you just briefly explain what
15 Thomas is teaching at a high level with
16 respect to the figure shown on the cover?

17 A. Sure. And to the best of my
18 recollection, I don't have this figure in my
19 declaration, so I'm going to make sure I get
20 reacquainted here in Thomas.

21 So, starting in Column 8 Line 66 of
22 Thomas, Thomas writes that Figure 5 is a
23 diagram representing a video game interface,
24 more specifically a graphical representation
25 of a football field with two sets of avatars

1 J. Janet

2 which are labeled 320, and forgive me for
3 having to go back and forth here, but -- so
4 320 you can see from the figure is pointing
5 to Xs and Os. Xs being one team and Os being
6 another.

7 Continuing, one of the sets of
8 avatars represents a defensive team or team
9 on defense, wherein the avatar 320 represents
10 a defensive player. The other set of avatars
11 represents an offensive team where each
12 avatar represents an offensive player and
13 continuing on the -- this is just in
14 referring to, you know, an event, you know,
15 before as he says, before any action begins,
16 which is commonly referred to as the pre-snap
17 state, uses input generally includes the
18 choices of formation from a set of predefined
19 choices. And the position of the -- that is,
20 the position of the avatars on the football
21 field, users input to -- can also include the
22 choice of play from a set of predefined
23 choices. And that would dictate, for
24 example, a route that each avatar would take,
25 how they move across the field.

1 J. Janet

2 Continuing on when action begins,
3 which is to say that, you know, once the
4 football is snapped the, you know, the
5 avatars begin moving, the skills are applied,
6 the rules that are -- the settings that are
7 chosen are applied and a first user can
8 control or controls one of the teams. The
9 other of the teams may be controlled by the
10 computer program or by a second user. And if
11 it's controlled by the computer program, it
12 may be a simulator which includes a learning
13 mode and a simulation mode.

14 Thomas goes on to describe the
15 learning mode as part of the simulator where
16 it records the user's input as the user
17 interacts with the game. And then, you know,
18 that's kind of where generally Figure 5, the
19 description from Thomas at least ends.

20 Q. What is the avatar in Thomas?

21 A. Well, the avatar would typically be
22 a player and of course the -- a player isn't
23 always necessarily an avatar, the player can
24 also be an object and it, you know, if it's
25 not centric to the -- who's actually playing

1 J. Janet

2 or I should say from the perspective of who's
3 playing.

4 Q. Let's take a look at your -- let's
5 take a look at your declaration where you've
6 analyzed Thomas for Claim 1 of the '134
7 patent. I believe that starts around
8 Paragraph 227.

9 Can you tell me when you're there?

10 A. Okay. I'm there.

11 Q. So, you've analyzed Thomas for
12 Grounds 1 and 2; is that right?

13 A. Correct.

14 Q. What is the difference between
15 Grounds 1 and 2?

16 A. Well, Ground 1 would be
17 anticipation and Ground 2 would be
18 obviousness.

19 Q. Okay. So, let's talk about your
20 analysis of Thomas for Ground 1 first,
21 specifically in Limitation 1.5.

22 You've analyzed limitation 1.5,
23 right?

24 A. Yes.

25 Q. Can you tell me what you mapped to

1 J. Janet

2 the second one or more object representations
3 of Limitation 1.5?

4 A. Well, as it states in the first
5 paragraph there, 241, the second object
6 representations are generated and received
7 during the simulation mode in Thomas.

8 Q. And what specifically in Thomas are
9 you saying is the second object
10 representation?

11 A. Well, for example, again, in
12 Paragraph 241 -- let me make sure I get my
13 quotes right here.

14 When the simulators and simulation
15 mode in a particular event and/or situation
16 occurs, the simulator 120 can invoke the
17 corresponding action based on the stored
18 data, thereby simulating the user, and that's
19 from Thomas Column 5 Lines 24 through 29
20 actually probably starting a little later in
21 24, 25, 26 somewhere in that range.

22 Q. Okay. I guess I'm asking, what
23 about Thomas' disclosure is the second
24 object -- second, I'll withdraw the question.

25 I'm asking, what part of Thomas'

1 J. Janet

2 disclosure are you mapping to the claimed
3 second one or more object representations?

4 A. Sure. So, continuing on that
5 paragraph, if the object representations
6 generated or received during the simulation
7 mode, for example, the spatial positions of
8 defenders, at least a partially -- at least a
9 partial match of the -- grammatical error
10 there. At least a partial match of the
11 object representations previously recorded
12 during learning mode, for example, the
13 spatial positions of defenders, the system
14 determines that the same avatar the user
15 controlled during learning mode should
16 execute the associated instruction set.

17 Q. I see that sentence in your
18 declaration, but I'm trying to understand
19 what you are mapping to the second one or
20 more object representations. I'm not hearing
21 you explain that.

22 Can you please explain that?

23 A. Again, just from that same
24 paragraph, and I elaborate a little bit more
25 below, but I said, for example, the spatial

1 J. Janet

2 positions of the defenders, which would be
3 the object representations.

4 And just to, I guess, add a little
5 clarity, little further down in Paragraph 241
6 where I have the quotes from Thomas:

7 For a catch and shoot event, during
8 the learning mode, the simulator records how
9 often a user catches and shoots right after
10 the catch and records, as a current
11 circumstance, the location of the user's
12 avatar that catches and shoots. During
13 playback mode, which would be your second
14 object representations, the simulator will
15 monitor when the simulated user catches the
16 ball and analyze the user's location on the
17 basketball court. If the simulated user is
18 located in the typical spot for catch and
19 shoot, then the simulator 120 will have the
20 simulated user immediately shoot the ball
21 after the catch.

22 So, the second object
23 representations would be, while in simulator
24 mode, would be the location, let's just say
25 in the typical spot for catch and shoot,

1 J. Janet

2 could also be the spatial positions of the
3 defensive avatars, which is mentioned in the
4 next paragraph.

5 Q. Yeah. You mentioned the
6 next paragraph, are you referring to
7 Paragraph 242; is that right?

8 A. No, I'm -- we can get to 242 in a
9 second. I'm actually referring to -- from
10 Thomas lines -- from Thomas Column 7 Lines 39
11 through 44 that's excerpted here in the
12 document.

13 Q. Okay. In that portion, Column 7
14 Lines 39 to 44, as you say, what part of
15 Thomas is the claimed second one or more
16 object representations?

17 A. Well, I believe I highlighted this,
18 but again, going back to Paragraph 241, the
19 second object representations would be, for
20 example, but not limited to the spatial
21 positions of the defenders. Could also be
22 whether the -- where the simulated user is on
23 the court, for example, if they are in the
24 typical spot for catch and shoot.

25 Q. In Paragraph 242, you said that the

1 J. Janet

2 second object representation is the spatial
3 position of defenders generated and received
4 during simulation mode, right?

5 A. Yes, sir.

6 Q. What is simulation mode doing
7 regarding the defenders in the context
8 of what you wrote in that sentence in
9 Paragraph 242?

10 THE WITNESS: Did you say
11 something, Matt?

12 MR. COLVIN: Objection to the
13 form.

14 You can answer.

15 Q. I'll rephrase just to clarify in
16 case there's any ambiguity.

17 When you wrote that the second
18 object representations (i.e., the spatial
19 position of defenders generated and received
20 during simulation mode), what is Thomas doing
21 with respect to the defenders?

22 MR. COLVIN: Objection to form.

23 A. Thomas is making note of where
24 these defenders are relative to the avatar.
25 And so, for example, in the next sentence,

1 J. Janet

2 the simulator records how covered the user
3 was during training than during playback
4 mode, analyzes the location of the simulated
5 user and the defensive coverage. If criteria
6 is met, then the simulator will invoke, for
7 example, a pump fake.

8 Q. What does Thomas mean by analyzing
9 the time and the score?

10 A. Well, Thomas mentions time and
11 score like time left in play and score as
12 things that an avatar would consider, just
13 like an object representation to dictate the
14 instructions that it would invoke or execute.

15 Q. Where does Thomas describe that the
16 avatar considers the score?

17 A. That would be in a different --
18 probably in a different section, but let me
19 try and go there.

20 Actually, just to be sure, you're
21 asking me where does Thomas describe what the
22 avatar, how it -- that it takes the score
23 into consideration; is that correct?

24 Q. Yeah, in your previous response you
25 mentioned that the score was considered by

1 J. Janet

2 the avatar. And so, I'm trying to understand
3 what you're referring to in Thomas'
4 disclosure.

5 A. Yeah, so even in this one, this
6 section that refers to 1.5, the quote from
7 Thomas Column 7 Lines 39 through 44 mentions
8 that:

9 During playback mode when an
10 inbound event occurs, the simulator will
11 retrieve the recorded data associated with
12 the inbound event and also analyze the
13 current situation, such as time, score and
14 spatial positions of the defensive avatars to
15 determine which action to invoke that
16 represents the simulated user.

17 So, if you're asking where in
18 Thomas, I'm happy to go there, of course,
19 but as I cite, if I'm not mistaken, if I put
20 that in correctly, it's Columns 7 Lines 39
21 through 44.

22 Q. I guess I'm trying to understand
23 what that passage is teaching or what it's
24 referring to.

25 Can you explain what it's talking

1 J. Janet

2 about, about analyzing the score?

3 A. Okay. So, sort of a different
4 game, but still Thomas, and I'm sure I can
5 find more examples like this, but the one
6 that jumps out to me as fairly to recall is
7 Column 5 starting at Line 45, which states:

8 For example, in the case of a
9 football game, if the simulated user is --
10 it's on its own 20-yard line and just failed
11 to reach the first down mark after a third
12 down play, for example, it is fourth down and
13 one, the simulator can analyze the time left
14 on the play clock and the score, to your
15 question, if the time left on the play clock
16 is less than two minutes and the simulated
17 user is losing by five points, then the
18 simulator will analyze such a situation to
19 determine whether the user would kick a field
20 goal or try to reach the end zone for a
21 touchdown.

22 Going on, if there's no value,
23 i.e., stored user input reported for the
24 given event and/or situation, then the
25 simulator will generate a random or default

1 J. Janet

2 response representing the second user
3 simulated input or response.

4 Anyway, to your question, that's
5 one example in Thomas where time on the clock
6 and score are both considered as object
7 representations to dictate an action set.

8 Q. Did you discuss that portion of
9 Thomas, mainly Column 5, this football
10 scenario, in your declaration?

11 A. I would have to go through and try
12 to highlight the specific references or the
13 specific excerpts where they might exist.
14 But, of course, you know, Thomas is
15 referenced here and certainly nothing was
16 meant to be excluded in that reference.

17 Q. Do you ever say in your declaration
18 that the time or the score is an object
19 representation?

20 A. Well, actually, in multiple places
21 I do. So, just scrolling through even in
22 this section where we're talking about --
23 well, if we go back to 1.4, the circumstances
24 and events that are mapped to object
25 representations in Thomas by me include,

1 J. Janet
2 among other times, time, score, spatial
3 positions of defensive avatars and a variety
4 of other things. So, for example, where I
5 discuss Limitation 1.4 Paragraph 238 quoting
6 from Thomas the same that I mentioned before
7 when we were talking about 1.5, analyze the
8 current situation, situation being object
9 representation such as time, score, spatial
10 positions of the defensive avatars.
11 Paragraph -- this is kind of
12 jumping ahead, but still referencing Thomas,
13 Paragraph 263, I say:
14 Thomas discloses instruction sets
15 correlated with object representations for a
16 first avatar that are learned in learning
17 mode and system records the archetype, and so
18 forth.
19 For example, Thomas discloses that
20 the system can invoke a stored instruction
21 set and response to a situation based on
22 time, score, and the spatial position of the
23 defense without requiring that the
24 instruction set be formed by the identifiable
25 avatar.

1 J. Janet

2 But my point here, those are mapped
3 to object representations, so situation
4 object representation.

5 Further down, analyze the current
6 situation such as time, score and the spatial
7 positions of the defensive avatars to
8 determine which action to invoke that
9 represents the simulated user.

10 I could keep going, I'm reasonably
11 sure I mention score and time in other places
12 and map to object representations --

13 Q. Can you --

14 (Cross-talk.)

15 A. -- situation.

16 Q. Can you show me someplace in your
17 analysis for Claim 1 in Ground 1 where you
18 equated score or time to the claimed object
19 representation?

20 MR. COLVIN: Asked and answered.

21 Q. Is it your -- I would like an
22 answer, a response, please, Dr. Janet.

23 A. I'm scrolling backwards to get to
24 Section 1. Sorry.

25 You know, I mentioned this before,

1 J. Janet

2 which is that even, if we look at 1.4 and
3 1.5, the excerpts that I have, the situation,
4 which would comprise your object
5 representations, such as time, score and
6 spatial positions of defensive avatars,
7 that's in Paragraph 238 and Paragraph 241.

8 So, I think there might be more with regards
9 to Claim 1, but those are the ones that I
10 think to your question map time, score and in
11 addition to that the positions of the
12 defensive avatars as object representations.

13 Q. You mentioned situation just now, I
14 think you were referring to Thomas'
15 disclosure of current situation.

16 Is it your position that the
17 current situation is an object?

18 A. The elements of the current
19 situation and even events, if they are
20 external to the avatar, are your object
21 representations in Thomas.

22 Q. Is it your position that the time
23 is an object representation?

24 A. Yes.

25 Q. Is it your position that the score

1 J. Janet

2 is an object representation?

3 A. Yes.

4 Q. And just to be clear, when you say
5 "the object representation," the claim refers
6 to first one or more object representations
7 and second one or more object
8 representations.

9 So, is it your position that the
10 time and score are mapped to the first one or
11 more object representations and the second
12 one or more object representations?

13 A. The time and score just -- those
14 are two of many examples of object
15 representations disclosed by Thomas are
16 mapped to the first object representations
17 during learning mode in Thomas, for example.
18 And the time and score and, again, other
19 object representations disclosed by Thomas
20 mapped to the second object representation,
21 at least for purposes of this section during
22 playback mode or simulation mode in Thomas.

23 Q. Okay. And where does Thomas
24 disclose that the time and score are used
25 in -- I'll withdraw this question.

1 J. Janet

2 To be clear, the object that you
3 are saying is being represented by an object
4 representation, you're referring to Thomas'
5 defenders as you noted in Paragraph 242 of
6 your declaration, right?

7 A. Sorry, I was scrolling to 242.
8 What was your question again?

9 Q. If you could turn to Paragraph 242
10 again and I'll ask with respect to that once
11 you're there.

12 A. I'm here, yeah.

13 Q. You see where you said "first
14 object representations" and then something in
15 parentheses and second object representations
16 and then something in parentheses in
17 Paragraph 242?

18 A. Yes.

19 Q. And the something that's in
20 parentheses each time is -- is regarding the
21 defenders, right?

22 A. Second object representations,
23 i.e., the spatial position of defenders
24 generated and received during simulation
25 mode, yes.

1 J. Janet

2 Q. So, the defender is the object
3 that's being represented according to your
4 analysis, right?

5 A. Well, more specifically, the
6 spatial position of the defenders, at least
7 referring to that particular parenthetical.

8 Q. And how does the score pertain to
9 the defender?

10 A. Well, the score is just one object
11 representation that's being factored into
12 the instruction set and selection process.
13 The defender --

14 Q. And how does the -- I'm sorry,
15 please continue. I thought you were done
16 speaking, but please continue.

17 A. I appreciate that. No, that's
18 okay, I'll leave it at that.

19 Q. And how does the time pertain to
20 the defender?

21 A. The time actually pertains more to
22 the decision-making process of what
23 instruction set or actions to be selected by
24 the avatar, by the user's avatar, I should
25 say.

1 J. Janet

2 MR. JAIRAM: Okay. It's probably
3 a good place for a break, let's take a
4 break and go off the record.

5 THE COURT REPORTER: We're off the
6 record.

7 (Recess from 10:52 a.m. to
8 11:00 a.m.)

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

11 MR. JAIRAM: Thank you.

12 BY MR. JAIRAM:

13 Q. Dr. Janet, if I may, we will move
14 on to discussion of Claim 12. If you can
15 please turn to your analysis of Claim 12 in
16 your declaration and let me know when you're
17 there.

18 A. Okay, I am there.

19 Q. Okay. So, which ground or grounds
20 have you analyzed Claim 12 with respect to?

21 A. That would be Grounds 1 and 2.

22 Q. Okay. I would like to talk about
23 your analysis for Ground 2. I guess you've
24 kind of discussed those two grounds together
25 for this claim; is that right?

1 J. Janet

2 A. Let me get my bearings here.

3 So, to begin with, I mention my
4 analysis and with regards to Limitations 4.1
5 through 4.3, forgive me, I'm bouncing around
6 here in the document trying to get back to
7 Claim 12, and I mention how Thomas discloses
8 knowledge base storing of first and third
9 correlation, including a third one or more
10 object representations correlated with a
11 third one or more instruction sets for
12 operating the first avatar of the
13 application, wherein the third correlation
14 includes a third object representation
15 representing one or more objects of the
16 application, and I reference the section
17 above.

18 So, with regards to Limitation
19 12.2, I refer back to my analysis regarding
20 Limitation 11.2 where I state that:

21 Thomas discloses that the first
22 correlation is at least partially learned in
23 a learning process where a user operates an
24 avatar.

25 Q. Dr. Janet, I guess I don't

1 J. Janet

2 understand what your response has to do with
3 my question. I was just asking if you
4 addressed Grounds 1 and 2 together in -- for
5 Claim 12.

6 A. Yeah, I was trying to break it -- I
7 was trying to answer your question, but I was
8 trying to make sure because there are some
9 references to prior sections that they are
10 consistent with my answer to your question.
11 So, I was kind of giving you a play by play
12 as I was looking at that.

13 Q. Okay. Could you please tell me
14 where you have analyzed Claim 12 for
15 Ground 2?

16 A. So, continuing on with the
17 limitation by limitation, you could see in
18 12.3 has a summary in Paragraph 297, I state:

19 POSITA would've understood and it
20 would've been obvious that when a second user
21 operates the same avatars as the first user,
22 such as avatars representing players on the
23 LA Lakers, the system would record and store
24 multiple correlations, (i.e., at least first,
25 second and third correlations comprising

1 J. Janet
2 first, second and third object
3 representations correlated with the first,
4 second and third instruction sets) for
5 operating the same avatar, which any other
6 user can download for use and simulation
7 mode.

8 Accordingly, I go on, a POSITA
9 would've recognized that two different users
10 playing with the LA Lakers during learning
11 mode would result in at least a portion of a
12 third correlation being learned in another
13 learning process that includes operating the
14 first avatar by another user.

15 Q. Okay. And I'm trying to understand
16 that paragraph, Paragraph 297.

17 A. Okay.

18 Q. Is that your analysis for Ground 1
19 or is it your analysis for Ground 2, or it
20 your analysis for both Grounds 1 and 2?

21 A. It's a summary of my analysis for
22 Grounds 1 and 2. It states:

23 A POSITA would've understood and it
24 would have been obvious.

25 Q. Okay. Does Grotmol -- withdraw the

1 J. Janet

2 question.

3 A. Are we jumping ahead or jumping
4 behind?

5 Q. No, it's too early in the morning,
6 I guess I can't use that excuse this late in
7 the morning, but withdraw that question.

8 Does Thomas disclose Limitation
9 12.3?

10 A. Well, prior to Paragraph 297, I
11 highlight Paragraph 296 that Thomas discloses
12 that the memory can record and store profiles
13 for multiple users. And then I excerpt:

14 Multiple users can compete against
15 each other either on a single console or from
16 multiple consoles. For example, a first user
17 can compete on a first video game console
18 against a second user competing on a second
19 video game console.

20 Continuing:

21 In the case where the simulator and
22 database resides on a server, any
23 participating user can upload its own user
24 profile for access by any other participating
25 user. And further, any participating users

1 J. Janet

2 can download or access any user profile
3 available in the database.

4 And then referring to Figure 6:

5 The inputs for a user are stored in
6 user profiles, which, as described above, may
7 be individual data structures in a database.

8 Q. Okay. I guess I'm just looking for
9 a yes or no. Is all that stuff that you said
10 in Paragraph 296, is that your basis or
11 explanation for Thomas does disclose, yes, or
12 Thomas does not disclose, no, Limitation
13 12.3? Can you please just tell me if Thomas,
14 yes or no, discloses or does not disclose
15 Limitation 12.3?

16 MR. COLVIN: Objection to form.

17 A. Yeah. So, it's my opinion that
18 Thomas discloses that a third correlation
19 learned in another learning process -- I'm
20 sorry, discloses a third correlation learned
21 in another learning process with operation of
22 the first avatar by another user.

23 Q. Okay. And Paragraph 296 contains
24 the entirety of your analysis about Thomas
25 disclosing Limitation 12.3. Is that correct?

1 J. Janet

2 A. It's the entirety of what I've put
3 in my report for my analysis and, you know, I
4 believe that it suffices as it is. Is there
5 more in Thomas that supports this? I believe
6 so. I can certainly, you know, revisit
7 Thomas and find other portions, but I believe
8 that this suffices as it is.

9 Q. Are you saying that there's some
10 part of your analysis that is not present in
11 your declaration that you're relying on?

12 A. I don't feel that anybody needs to
13 fill in any gaps that there are any gaps here
14 with what's cited. I guess all I'm saying is
15 that Thomas, as a whole, provides examples
16 like this, which is what I cite, for example,
17 in Paragraph 296. I just happen to choose
18 this to demonstrate the limitations being
19 met.

20 Q. In Paragraph 297, is your analysis
21 for Ground 2 and not for Ground 1, correct?

22 A. I don't think that's what I said.
23 If you look at the beginning of Paragraph
24 297, which is a summary of the analysis, but
25 it says that a POSITA would've understood,

1 J. Janet

2 i.e., Ground 1, and it would've been obvious,

3 i.e., Ground 2.

4 Q. Okay. Apart from the first five
5 words of Paragraph 297 which say "A POSITA
6 would have understood," is there any other
7 analysis in Paragraph 297 that pertains to
8 Ground 1?

9 A. Paragraph 297 doesn't encompass the
10 entirety of the analysis. Again, 297 is
11 continue -- continued from 296 and -- which
12 is also part of the analysis.

13 Q. I understand that. But that you're
14 saying that there's something preceding
15 Paragraph 297, that's part of the analysis.
16 I'm trying to understand within Paragraph
17 297, just which ground it's talking about
18 because you've lumped two different grounds
19 together for Claim 12 at this portion of your
20 declaration. So, it's a little hard for me
21 to follow which piece of your analysis is for
22 which ground. That's why I'm trying to
23 understand your analysis.

24 So, here's my question:

25 Apart from saying at the start of

1 J. Janet

2 Paragraph 297, "A POSITA would have
3 understood," is any of the rest of
4 Paragraph 297 dealing with Ground 1?

5 A. I believe so. I believe that it
6 is tying back to what's described in
7 Paragraph 296, I'd be giving a different
8 example of, you know, putting in the team,
9 the LA Lakers, and then the bottom sentence:

10 A POSITA would've recognized that
11 two different users playing with the LA
12 Lakers during learning mode would result in
13 at least a portion of the third correlation
14 being learned in another learning process
15 that includes operating the first avatar by
16 another user.

17 Q. Okay. So, if I'm understanding
18 your response there, you're saying that
19 Paragraph 297 is your analysis for both
20 Grounds 1 and 2; is that correct?

21 A. It is part of the analysis for
22 Grounds 1 and 2, it summarizes, it
23 exemplifies and for purposes of adding
24 clarity.

25 Q. Okay. And is your Ground 2

1 J. Janet
2 analysis of Claim 12 entirely in
3 Paragraph 297?

4 A. Again, I'm treating this as a
5 whole, I'm not leaving out Paragraph 296.
6 And that being the case, the combination of
7 296 and 297 is analysis for Ground 1 and the
8 analysis for Ground 2. From the perspective
9 of a person of ordinary skill, it's
10 disclosed. And for where there might be any
11 dispute where there might be a perception of
12 a small difference between explicit
13 disclosure and what a POSITA or, you know,
14 what somebody might consider to be less than
15 explicit, that difference is trivial really,
16 but the Ground 2 is simply put in there to
17 help to reinforce.

18 Q. Okay. Let's look at Paragraph 296.
19 When you are saying in Paragraph
20 296 that Thomas discloses Limitation 12.3, I
21 see that you have put in bold and italics
22 certain parts of Thomas' disclosure, right?

23 A. Yes, sir.

24 Q. And those are the parts of Thomas'
25 disclosure that you are saying disclose

1 J. Janet

2 Limitation 12.3, right?

3 A. They emphasize, but I included
4 other portions because, you know, I believe
5 they're relevant.

6 Q. Okay. Let's look at where you've
7 pointed to:

8 A participating user can upload its
9 own user profile for access by any other
10 participating user.

11 A. Okay.

12 Q. Is that learning in another
13 learning process?

14 A. Well, again, you're leaving out the
15 first portion of that paragraph where I
16 mention that multiple users can compete
17 against each other on a single console or
18 from multiple consoles. And so, for example,
19 a first user can compete on a first video
20 game console against a second user competing
21 on a second video game console.

22 Q. Okay. And what does two users
23 competing against each other have to do with
24 learning a portion of the third correlation
25 in another learning process that includes

1 J. Janet

2 operating the first avatar at least partially
3 by another user?

4 A. Let me think about how to add to
5 what's written here 'cause I feel that what's
6 written here explains it pretty clearly. The
7 fact that user profiles, however trained they
8 are, can be uploaded and made available and
9 means that other users can download them and
10 then further the training or learning, if you
11 will. And as a consequence of this
12 availability disclosed by Thomas, these third
13 correlations can be learned in another
14 learning process with the operation of the
15 first avatar, which again could've -- you
16 know, is in Thomas for this particular
17 example a user profile that was previously
18 loaded and --

19 (Cross-talk.)

20 Q. I'm sorry, please continue.

21 A. Well, the other learning process
22 would be taking that uploaded profile from
23 the first avatar and performing additional
24 learning, if you will.

25 Q. When a user competes against

1 J. Janet

2 another user, are we talking about like video
3 games, player one is playing against player
4 two in the Super Bowl? I mean, what are we
5 talking about there?

6 A. Well, I gave an example of, for
7 example, the LA Lakers. So, you know,
8 conceivably it could be any support where you
9 have different avatars playing against each
10 other. And again, there are different modes,
11 there's learning mode and there's playback
12 mode. And if -- if I, for example, want to
13 upload a -- an avatar, whether it's from
14 something that somebody else did or, you
15 know, which could include, for example the
16 default or the archetype and I want to tailor
17 it, that's disclosed in Thomas.

18 Q. Okay. Let's take the basketball
19 example that you mentioned. So, you
20 mentioned the LA Lakers, I like the Boston
21 Celtics, so first user is competing against
22 second user in the basketball game. First
23 user is controlling the Lakers and the second
24 user is controlling Celtics, right?

25 A. In my example?

1 J. Janet

2 Q. I'm just taking the first piece of
3 text that you put in bold and italics, we're
4 just going to walk through it, everything
5 piece by piece and I'm just trying to
6 understand exactly what's going on.

7 So, if the Lakers are playing
8 Celtics, the first user is controlling one of
9 those two teams and the second user is
10 controlling the other of those two teams,
11 right?

12 A. Well, I realize in the quote it
13 talks about how they can compete Queens each
14 other. They can also play on the same team
15 with each other and just simply upload
16 another's user profile. So, this is why I'm
17 saying you can't just take 296 or just 297,
18 this is, you know, the -- these different
19 opportunities are disclosed in Thomas.

20 But back to your hypothetical, so
21 you're asking me, as an example, that one
22 user can be on one team and one user could be
23 on another team.

24 Q. I'm just asking you about literally
25 the first part of Thomas that you quote for

1 J. Janet

2 this limitation and you put in it bold and
3 italics, I'm just trying to understand the
4 relevance of that passage for your analysis.

5 So, let me take a step back and
6 ask:

7 Do you stand by your reliance on
8 the sentence that begins with "Multiple
9 users," that's shown in Paragraph 296?

10 A. I stand by it, I don't exclude
11 anything else from Thomas, but, yeah.

12 Q. And you relied on the first two
13 sentences that you excerpted and put in bold
14 and italics, you relied on those for your
15 analysis?

16 A. They're certainly part of the
17 analysis, yes, sir.

18 Q. Okay. Let's go on to Paragraph
19 297.

20 So, you talk about something that
21 would've been obvious, right?

22 A. Yes.

23 Q. So, are you doing obviousness
24 analysis there at Paragraph 297?

25 A. Well, as I mentioned before, it's

1 J. Janet

2 my opinion that Thomas discloses this and a
3 person of ordinary skill would've understood
4 that, where the audience might believe that
5 the disclosures is less than explicit, I
6 include obviousness through, for example,
7 this example and simply for purposes of
8 reinforcing the position that that limitation
9 is met by Thomas.

10 Q. Well, you mentioned, you know,
11 where the audience might believe that the
12 disclosure is less than explicit.

13 Do you believe that a POSITA
14 would've found the disclosure in Thomas of
15 Limitation 12.3 to be less than explicit?

16 A. No.

17 Q. You don't believe that a POSITA
18 would've found the disclosure in Thomas of
19 Limitation 12.3 is less than explicit?

20 A. I don't. It's not necessarily word
21 for word, but there are words that have
22 similar meanings, but are different words.

23 Q. Okay. Let's go on to Claim 13.

24 A. Okay.

25 Q. And which ground or grounds have

1 J. Janet

2 you analyzed Claim 13 with respect to Thomas
3 in your declaration?

4 A. Both Ground 1 and 2.

5 Q. Okay. Can you point me to where
6 there is Ground 2 analysis of Claim 13?

7 A. So, as we discussed with Claim 12,
8 possibly another claim where I analyzed on
9 the basis of both Ground 1 and 2, I did not
10 break out Ground 2 analysis separately from
11 Ground 1. Again, I looked at this as a whole
12 and where there might not be a word for word
13 or similar lexicon match, to me, as a person
14 of ordinary skill, Thomas discloses
15 sufficiently to meet Ground 1.

16 If the audience or reader is
17 expecting a word for word, then I include
18 obviousness, even though, again, it's my
19 opinion that Thomas discloses these
20 limitations.

21 Q. And which limitation or limitations
22 of Claim 13 are you providing obviousness
23 analysis for with respect to Ground 2?

24 A. (Document review.)

25 I really don't know how to answer

1 J. Janet
2 it differently. I reviewed this on the
3 whole, it's my opinion that Thomas discloses
4 and meets these limitations sufficiently
5 under Ground 1 and where there's not a word
6 for word match that it would have been, at a
7 minimum, still obvious to a person of
8 ordinary skill.

9 Q. What paragraph did you say that
10 stuff about something would've been obvious?

11 A. I don't know that I actually use
12 the word "obvious" in this particular section
13 because I, as I mentioned before, believe
14 that Thomas discloses all of the limitations.

15 Q. Okay. Apart from using the word
16 "obvious," which paragraph of your
17 declaration contains your obviousness
18 analysis for Claim 13?

19 A. Again, that would be the entirety
20 from Paragraphs 299 through Paragraph 306.

21 Q. Okay. Let's go on to Claim 14.

22 Can you tell me when you're at that
23 part of your declaration?

24 A. I'm there.

25 Q. Which ground or grounds did you

1 J. Janet

2 analyze Claim 14 under with respect to
3 Thomas?

4 A. That would be Grounds 1 and 2.

5 Q. Okay. Can you tell me for
6 Ground 2, what are you analyzing Thomas as
7 lacking? What part of limitation -- excuse
8 me, what part of Claim 14 are you analyzing
9 Thomas as lacking?

10 A. Well, I don't believe that Thomas
11 is lacking anything with regards to Claim 14
12 and its limitations. As I mentioned before,
13 I look at this on the whole where there might
14 not be a word for word match exactly, you
15 know, if there's any position the audience
16 might take that it's little less than
17 explicit, the difference is trivial.

18 And so, to your question, don't
19 feel that Thomas really lacks disclosure.

20 Q. So, it's your position that Thomas
21 discloses all of Claim 14?

22 A. Yes, sir.

23 Q. Okay. And which paragraph or
24 paragraphs of your declaration contain your
25 obviousness analysis for Ground 2, Claim 14?

1 J. Janet

2 A. Well, here too that would be the
3 entirety. Again, I -- it's my opinion that
4 Thomas discloses all of the elements to meet
5 the limitations of Claim 14 and I acknowledge
6 that there's a possibility because there
7 might not be a word for word match that does
8 not suffice to the audience or reader than
9 the obvious position -- obviousness position
10 reinforces the invalidity of this claim.

11 Q. When you say "the entirety,"
12 are you referring to the entirety of
13 Paragraphs 308 through 312, which are the
14 paragraphs pertaining to Claim 14 in your
15 declaration?

16 A. Starting at Paragraph 307 which
17 ties back to Limitation 4.1 through 312, yes,
18 sir.

19 Q. Okay. So, you're saying that
20 Paragraphs 307 through 312 contain
21 obviousness analysis for Ground 2; is that
22 correct?

23 A. To be clear, the entirety of that
24 is reviewed through the lens of a POSITA
25 under Grounds 1 and 2.

1 J. Janet

2 Are you asking for anything
3 specific within that selection?

4 Q. Are you aware that you are under
5 oath here today?

6 A. Yes, sir.

7 Q. And does it remain your position
8 that the entirety of Paragraphs 307 through
9 312 provide your obviousness analysis for
10 Ground 2?

11 A. They include the obviousness
12 analysis, yes, sir.

13 MR. JAIRAM: Let's take a break.
14 We can go off the record.

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

17 (Lunch recess from 11:43 a.m. to
18 12:31 p.m.)

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

21 MR. JAIRAM: I have no further
22 questions.

23 MR. COLVIN: Okay. Let's take
24 a -- go off the record and take a
25 break for a minute.

1 J. Janet

2 THE COURT REPORTER: We're off the
3 record.

4 (Recess taken from 12:31 p.m.
5 until 12:35 p.m.)

6 THE COURT REPORTER: We're back on
7 the record.

8 MR. COLVIN: No questions here,
9 Dr. Janet. Thanks for your time.

10 We can go off the record.

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

13 (Time noted: 12:35 p.m. Eastern Time)

14

15

16

17

18

19

20

21

22

23

24

25

1 J. Janet

2

3 J U R A T

4

5

6 I, JASON JANET, do hereby certify

7 under penalty of perjury that I have

8 read the foregoing transcript of my

9 deposition taken on MARCH 19, 2024;

10 that I have made such corrections as

11 appear noted herein in ink, initialed

12 by me; that my testimony as contained

13 herein, as corrected, is true and

14 correct.

15

16

17 _____
JASON JANET

18

19 Subscribed and sworn to before me

20 This _____ day of _____, 20__.

21

22 _____
NOTARY PUBLIC

23

24

25

1 J. Janet

2 -----I N D E X-----

3 WITNESS: JASON JANET

4 EXAMINATION BY: PAGE

5 MR. JAIRAM 4

6

7

8 -----E X H I B I T S-----
(Exhibits Referenced)

9 NUMBER DESCRIPTION PAGE

10 Exhibit 1003 Declaration of Jason 7
11 Janet

12 Exhibit 1005 Grotmol Reference 11

13 Exhibit 1006 Buehler Reference 11

14

15

16

17

18

19

20

21

22

23

24

25

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

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 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 26th day of March, 2024.

Candida Borriello

CANDIDA BORRIELLO

1 J. Janet

2 ERRATA SHEET FOR THE TRANSCRIPT OF:

3 Case Name: TESLA v. AUTONOMOUS

4 Dep. Date: MARCH 19, 2024

4 Deponent: JASON JANET

5	Pg.	Ln.	Now Reads	Should Read	Reason
6	_____	_____	_____	_____	_____
7	_____	_____	_____	_____	_____
8	_____	_____	_____	_____	_____
9	_____	_____	_____	_____	_____
10	_____	_____	_____	_____	_____
11	_____	_____	_____	_____	_____
12	_____	_____	_____	_____	_____
13	_____	_____	_____	_____	_____
14	_____	_____	_____	_____	_____
15	_____	_____	_____	_____	_____
16	_____	_____	_____	_____	_____
17	_____	_____	_____	_____	_____
18	_____	_____	_____	_____	_____
19	_____	_____	_____	_____	_____

20 _____
JASON JANET

21 SUBSCRIBED AND SWORN BEFORE ME,

22 This____ day of_____, 20__.

23 _____
24 Notary Public

25 My Commission Expires:_____

1	32:7 33:5,14 38:19 40:2 47:7	40:8,16 47:4,6,9,10, 23 49:4,6,25 50:21,25 51:10	299 48:20
1 10:5 15:6, 12,15,16,20 26:17,24 27:9 31:21 33:4 34:18, 20,22 37:21 38:2,8 39:4, 20,22 40:7 47:4,9,11,15 48:5 49:4 50:25	12.2 32:19 12.3 33:18 35:9 36:13,15,25 40:20 41:2 46:15,19 120 16:16 18:19 12:31 51:18 13 46:23 47:2, 6,22 48:18 134 7:10,11 8:3 10:18,23 11:16 15:6 14 48:21 49:2, 8,11,21,25 50:5,14 16 10:20 179 8:24 182 9:7 183 9:13 184 9:19 19 10:6	20-yard 23:10 227 15:8 235 9:24 238 25:5 27:7 24 16:19,21 241 16:5,12 18:5 19:18 27:7 242 19:7,8,25 20:9 29:5,7, 9,17 25 16:21 26 16:21 263 25:13 286 9:24 10:2 29 16:19 296 35:11 36:10, 23 37:17 38:11 39:7 40:5,7,18,20 44:17 45:9 297 33:18 34:16 35:10 37:20, 24 38:5,7,9, 10,15,17 39:2,4,19 40:3,7 44:17 45:19,24	3 306 48:20 307 50:16,20 51:8 308 50:13 312 50:13,17,20 51:9 320 13:2,4,9 39 19:10,14 22:7,20
1.4 24:23 25:5 27:2 1.5 15:21,22 16:3 22:6 25:7 27:3 10 9:25 10:8 10,607,134 7:6 1001 6:21 1003 6:21 7:23 8:2,6,8,14 1005 6:22 11:18, 24 12:5 1006 6:22 11:20, 24 10:52 31:7 11.2 32:20 11:00 31:8 11:43 51:17 12 31:14,15,20	2 2 15:12,15,17 31:21,23 33:4,15 34:19,20,22 37:21 38:3 39:20,22,25	4 4 8:25 4.1 32:4 50:17 4.3 32:5 44 19:11,14 22:7,21 45 23:7	5 5 12:11,22 14:18 16:19 23:7 24:9 585 10:11,13,21

6	add 18:4 42:4	analyzing 11:11 21:8 23:2 49:6,8	asking 6:19 11:5 16:22,25
6 36:4 66 12:21	adding 39:23	and/or 16:15 23:24	21:21 22:17 33:3 44:21, 24 51:2
7	addition 27:11	Andre 4:15	associated 17:16 22:11
7 19:10,13 22:7,20	additional 42:23	another's 44:16	assume 5:9
8	addressed 33:4	answer 5:5,14 6:3 20:14 26:22	audience 46:4,11 47:16 49:15 50:8
8 12:21	addressing 9:25	answered 26:20	availability 42:12
A	ago 7:15	answers 5:20,24	available 36:3 42:8
A-N-D-R-E 4:16	ahead 25:12 35:3	anticipation 15:17	avatar 13:9,12,24 14:20,21,23 17:14 18:12 20:24 21:12, 16,22 22:2 25:16,25 27:20 30:24 32:12,24 34:5,14 36:22 39:15 42:2,15,23 43:13
a.m. 31:7,8 51:17	ambiguity 20:16	anybody 37:12	avatars 12:25 13:8, 10,20 14:5 19:3 22:14 25:3,10 26:7 27:6,12 33:21,22 43:9
able 6:3,24 7:2	analysis 10:4 11:9 15:20 26:17 30:4 31:15, 23 32:4,19 34:18,19,20, 21 36:24 37:3,10,20, 24 38:7,10, 12,15,21,23 39:19,21 40:2,7,8 45:4,15,17, 24 47:6,10, 23 48:18 49:25 50:21 51:9,12	anyone 6:12	aware 6:2 8:16 11:4 51:4
above 10:2,4 32:17 36:6	analyze 18:16 22:12 23:13,18 25:7 26:5 49:2	apart 11:2 38:4,25 48:15	back 13:3 19:18
access 35:24 36:2 41:9	analyzed 11:13 15:6, 11,22 31:20 33:14 47:2,8	appears 7:2 8:12	
accurate 5:19,23 6:4 8:10	analyzes 21:4	application 32:13,16	
acknowledge 50:5		applied 14:5,7	
across 13:25		applies 10:6	
action 13:15 14:2 16:17 22:15 24:7 26:8		appreciate 30:17	
actions 30:23		archetype 25:17 43:16	
		around 15:7 32:5	
		art 11:10,12,14, 15	
		asked 7:20 26:20	

24:23 31:9 32:6,19 39:6 44:20 45:5 50:17 51:19 backwards 26:23 ball 18:16,20 base 32:8 based 16:17 25:21 basic 4:19 basically 8:25 basis 36:10 47:9 basketball 18:17 43:18, 22 bearings 32:2 begin 4:18 14:5 32:3 beginning 37:23 begins 13:15 14:2 45:8 behind 35:4 believe 10:9,11,20 12:10 15:7 19:17 37:4, 5,7 39:5 41:4 46:4, 11,13,17 48:13 49:10 below 10:7 17:25 best 12:17 bit 17:24	bold 40:21 44:3 45:2,13 Boston 43:20 bottom 39:9 bouncing 32:5 bound 5:4 Bowl 43:4 break 31:3,4 33:6 47:10 51:13, 25 breaks 6:9 briefly 12:14 Buehler 11:17,20,24 C called 4:5 case 6:18 20:16 23:8 35:21 40:6 catch 18:7,10,18, 21,25 19:24 catches 18:9,12,15 caution 6:7 Celtics 43:21,24 44:8 centric 14:25 certain 6:20 40:22	certainly 24:15 37:6 45:16 chart 10:7 chat 6:22 choice 13:22 choices 13:18,19,23 choose 37:17 chosen 14:7 circumstance 18:11 circumstances 24:23 cite 22:19 37:16 cited 37:14 claim 8:25 9:25 10:5,6,8,20 15:6 26:17 27:9 28:5 31:14,15,20, 25 32:7 33:5,14 38:19 40:2 46:23 47:2, 6,7,8,22 48:18,21 49:2,8,11, 21,25 50:5, 10,14 claimed 17:2 19:15 26:18 claims 11:14,16 clarification 7:21 clarify 7:17 20:15	clarity 18:5 39:24 clear 28:4 29:2 50:23 clearly 42:6 clock 23:14,15 24:5 Column 12:21 16:19 19:10,13 22:7 23:7 24:9 Columns 22:20 COLVIN 20:12,22 26:20 36:16 51:23 combination 40:6 comma 9:2,8,14,19 commonly 13:16 compete 35:14,17 41:16,19 44:13 competes 42:25 competing 35:18 41:20, 23 43:21 complete 5:19,24 6:4 8:9 completeness 4:23 comprise 27:4 comprising 33:25 computer 14:10,11
--	---	--	---

conceivably 43:8	convenience 7:12	criteria 21:5	25:3,10 26:7 27:6,12
conditions 5:22	copies 11:23	Cross-talk 26:14 42:19	demonstrate 37:18
conducted 4:20 7:14	copy 6:17 8:5,10	current 18:10 22:13 25:8 26:5 27:15,17,18	deposition 6:9 7:5,14
consequence 42:11	correct 8:3,17,21 15:13 21:23 36:25 37:21 39:20 50:22		depositions 4:20
consider 21:12 40:14	correctly 22:20	D 	describe 14:14 21:15, 21
consideration 21:23	correlated 25:15 32:10 34:3	data 16:18 22:11 36:7	described 36:6 39:6
considered 21:25 24:6	correlation 9:3,9,11,14, 16,20,22 32:9,13,22 34:12 36:18, 20 39:13 41:24	database 35:22 36:3,7	description 14:19
considers 21:16	correlations 33:24,25 42:13	dealing 39:4	determine 22:15 23:19 26:8
consistent 33:10	corresponding 16:17	decision- making 30:22	determines 17:14
console 35:15,17,19 41:17,20,21	could've 42:15	declaration 7:23 8:3,6, 10,13,17 11:9 12:19 15:5 17:18 24:10,17 29:6 31:16 37:11 38:20 47:3 48:17, 23 49:24 50:15	diagram 12:23
consoles 35:16 41:18	couple 8:19	default 23:25 43:16	dictate 13:23 21:13 24:7
contains 36:23 48:17	course 14:22 22:18 24:14	defender 30:2,9,13,20	difference 15:14 40:12, 15 49:17
context 20:7	court 4:2 5:2,13 18:17 19:23 31:5,9 51:15,19	defenders 17:8,13 18:2 19:21 20:3, 7,19,21,24 29:5,21,23 30:6	different 21:17,18 23:3 34:9 38:18 39:7, 11 43:9,10 44:18 46:22
continue 10:16 30:15, 16 38:11 42:20	coverage 21:5	defense 13:9 25:23	differently 48:2
continued 38:11	covered 21:2	defensive 13:8,10 19:3 21:5 22:14	disclose 28:24 35:8 36:11,12,14 40:25
continuing 13:7,13 14:2 17:4 33:16 35:20			disclosed 28:15,19 40:10 42:12 43:17 44:19
control 14:8			discloses 10:5 25:14, 19 32:7,21
controlled 14:9,11 17:15			
controlling 43:23,24 44:8,10			
controls 14:8			

35:11 36:14, 18,20 40:20 46:2 47:14, 19 48:3,14 49:21 50:4 disclosing 36:25 disclosure 16:23 17:2 22:4 27:15 40:13,22,25 46:12,14,18 49:19 disclosures 46:5 discuss 6:8 8:25 24:8 25:5 discussed 31:24 47:7 discussing 10:20 discussion 10:11,13 31:14 dispute 40:11 document 19:12 32:6 47:24 documents 6:15,20,21 doing 12:13 20:6, 20 45:23 download 6:24 7:3 34:6 36:2 42:9 dropped 10:10 duly 4:6	E early 35:5 either 6:16 35:15 elaborate 17:24 electronic 6:16 8:5 elements 27:18 50:4 emphasize 41:3 encompass 38:9 end 23:20 ends 14:19 entirely 40:2 entirety 36:24 37:2 38:10 48:19 50:3,11,12, 23 51:8 equated 26:18 error 17:9 errors 8:16 11:2,5 event 13:14 16:15 18:7 22:10, 12 23:24 events 24:24 27:19 exactly 44:6 49:14 EXAMINATION 4:9 examined 4:7	examples 23:5 28:14 37:15 excerpt 35:13 excerpted 19:11 45:13 excerpts 24:13 27:3 exclude 45:10 excluded 24:16 excuse 35:6 49:7 execute 17:16 21:14 exemplifies 39:23 exhibit 7:23 8:2,6, 8,14 11:18, 20,24 12:5 Exhibits 6:21 exist 24:13 expecting 47:17 explain 12:14 17:21, 22 22:25 explaining 10:4 explains 42:6 explanation 36:11 explicit 40:12,15 46:5,12,15, 19 49:17 external 27:20	F fact 42:7 factored 30:11 failed 23:10 fairly 23:6 fake 21:7 feel 37:12 42:5 49:19 field 12:25 13:21, 25 23:19 figure 12:9,11,13, 16,18,22 13:4 14:18 36:4 fill 37:13 find 23:5 37:7 first 14:7 15:20 16:4 23:11 25:16 28:6, 10,16 29:13 32:8,12,21 33:21,24 34:2,3,14 35:16,17 36:22 38:4 39:15 41:15, 19 42:2,15, 23 43:21,22 44:2,8,25 45:12 five 23:17 38:4 follow 38:21
---	---	--	---

follows 4:8	20:3,19 29:24	grouping 9:18	inbound 22:10,12
football 12:25 13:20 14:4 23:9 24:9	gestures 5:15	guess 9:8,25 11:2 12:8 16:22 18:4 22:22 31:23 32:25 35:6 36:8 37:14	include 13:21 24:25 43:15 46:6 47:17 51:11
forgive 13:2 32:5	given 23:24		included 41:3
form 20:13,22 36:16	giving 33:11 39:7		includes 9:3,9,11,14, 16,20,22 13:17 14:12 32:14 34:13 39:15 41:25
formation 13:18	goal 23:20	H	including 32:9
formed 25:24	goes 14:14	happen 37:17	individual 36:7
forth 10:7 13:3 25:18	going 12:19 19:18 23:22 26:10 44:4,6	happy 22:18	input 13:17,21 14:16 23:23 24:3
found 46:14,18	good 4:11,12 31:3	hard 6:16 38:20	inputs 36:5
four 6:21	grammatical 17:9	health 5:22	instruction 17:16 25:14, 20,24 30:12, 23 32:11 34:4
fourth 23:12	graphical 12:24	hearing 17:20	instructions 21:14
full 4:14,15	Grotmol 11:18 34:25	help 40:17	interacts 14:17
G	ground 4:19,22 15:16,17,20 26:17 31:19, 23 33:15 34:18,19 37:21 38:2, 3,8,17,22 39:4,25 40:7,8,16 46:25 47:4, 6,9,10,11, 15,23 48:5, 25 49:6,25 50:21 51:10	high 12:15	interface 12:23
game 12:23 14:17 23:4,9 35:17,19 41:20,21 43:22	grammatical 17:9	highlight 24:12 35:11	interrupt 10:12
games 43:3	graphical 12:24	highlighted 19:17	introduced 7:24 11:19, 21
gaps 37:13	Grotmol 11:18 34:25	honest 5:19,23 6:4	invalidity 50:10
gave 43:6	ground 4:19,22 15:16,17,20 26:17 31:19, 23 33:15 34:18,19 37:21 38:2, 3,8,17,22 39:4,25 40:7,8,16 46:25 47:4, 6,9,10,11, 15,23 48:5, 25 49:6,25 50:21 51:10	hypothetical 44:20	invoke 16:16 21:6, 14 22:15 25:20 26:8
generally 13:17 14:18	grounds 15:12,15 31:19,21,24 33:4 34:20, 22 38:18 39:20,22 46:25 48:25 49:4 50:25	I	
generate 23:25		i.e 20:18 33:24	
generated 16:6 17:6		i.e. 23:23 29:23 38:2,3	
		identifiable 25:24	
		immediately 18:20	

IPR 7:11,17,19 8:3 10:14 11:14 IPR2023-01169 6:22 7:5 IPRS 7:15 issue 10:14 italics 40:21 44:3 45:3,14	46:1 47:1 48:1 49:1 50:1 51:1 Jason 4:15 7:24 jumping 25:12 35:3 jumps 23:6	Lakers 33:23 34:10 39:9,12 43:7,20,23 44:7 late 35:6 learned 25:16 32:22 34:12 36:19, 20 39:14 42:13 learning 14:12,15 17:12,15 18:8 25:16 28:17 32:23 34:10,13 36:19,21 39:12,14 41:12,13,24, 25 42:10,14, 21,24 43:11 leave 30:18 leaving 40:5 41:14 left 21:11 23:13, 15 lens 50:24 level 12:15 lexicon 47:13 limitation 15:21,22 16:3 25:5 32:18,20 33:17 35:8 36:12,15,25 40:20 41:2 45:2 46:8, 15,19 47:21 49:7 50:17 limitations	10:5,6 32:4 37:18 47:20, 21 48:4,14 49:12 50:5 limited 19:20 line 12:21 23:7, 10 lines 16:19 19:10, 14 22:7,20 literally 44:24 little 16:20 17:24 18:4,5 38:20 49:16 loaded 42:18 located 18:18 location 18:11,16,24 21:4 look 12:3 15:4,5 27:2 37:23 40:18 41:6 49:13 looked 47:11 looking 33:12 36:8 losing 23:17 lumped 38:18 lunch 51:17
J	K		
J-A-N-E-T 4:17 J-A-S-O-N 4:16 JAIRAM 4:10 7:25 11:22 31:2, 11,12 51:13, 21 Janet 4:1,16 5:1 6:1,12 7:1, 24 8:1,2 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1,22 27:1 28:1 29:1 30:1 31:1,13 32:1,25 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1	keep 26:10 kick 23:19 kind 14:18 25:11 31:24 33:11 know 4:19 5:8 10:25 11:3 12:5 13:14 14:3,4,17,24 24:14 26:25 31:16 37:3,6 39:8 40:13 41:4 42:16 43:7,15 44:18 46:10 47:25 48:11 49:15 knowledge 32:8		
	L		
	LA 33:23 34:10 39:9,11 43:7,20 labeled 13:2 lacking 49:7,9,11 lacks 49:19		
			M
			made 42:8 make 7:17 10:18,

21 12:19 16:12 33:8 making 20:23 manner 6:5 map 11:16 26:12 27:10 mapped 15:25 24:24 26:2 28:10, 16,20 mapping 17:2,19 mappings 11:14 mark 23:11 match 17:9,10 47:13 48:6 49:14 50:7 Matt 20:11 mean 10:19,23 21:8 43:4 meanings 46:22 means 42:9 meant 24:16 medications 5:17 meet 47:15 50:4 meets 48:4 memory 8:20 35:12 mention 7:11,16 26:11 32:3,7 41:16	mentioned 7:10 11:3 19:3,5 21:25 25:6 26:25 27:13 43:19, 20 45:25 46:10 48:13 49:12 mentions 21:10 22:7 met 21:6 37:19 46:9 minimum 48:7 minute 51:25 minutes 23:16 mistaken 22:19 mode 14:13,15 16:7,15 17:7,12,15 18:8,13,24 20:4,6,20 21:4 22:9 25:17 28:17, 22 29:25 34:7,11 39:12 43:11, 12 modes 43:10 monitor 18:15 morning 4:11,12 35:5,7 move 13:25 31:13 moving 14:5 multiple 24:20 33:24 35:13,14,16	41:16,18 45:8 N name 4:14,15 nature 11:9 necessarily 14:23 46:20 necessary 5:9 need 7:16 needs 37:12 Notary 4:6 note 11:6 20:23 noted 29:5 number 7:6 O oath 4:25 51:5 object 9:4,5,9,11, 15,17,20,22 14:24 16:2, 5,9,24 17:3, 5,11,20 18:3,14,22 19:16,19 20:2,18 21:13 24:6, 18,24 25:8, 15 26:3,4, 12,18 27:4, 12,17,20,23 28:2,5,6,7, 11,12,14,16, 19,20 29:2,	3,14,15,22 30:2,10 32:10,14 34:2 Objection 20:12,22 36:16 objects 32:15 obvious 33:20 34:24 38:2 45:21 48:7,10,12, 16 50:9 obviousness 15:18 45:23 46:6 47:18, 22 48:17 49:25 50:9, 21 51:9,11 occurs 16:16 22:10 offensive 13:11,12 okay 5:10,11,15 6:10 7:4,12 11:8 15:10, 19 16:22 19:13 23:3 28:23 30:18 31:2,18,19, 22 33:13 34:15,17,25 36:8,23 38:4 39:17,25 40:18 41:6, 11,22 43:18 45:18 46:23, 24 47:5 48:15,21 49:5,23 50:19 51:23 once 14:3 29:10 one 13:5,7 14:8 16:2 17:3,19
---	---	--	--

19:15 22:5 23:5,13 24:5 28:6,7,10,12 30:10 32:9, 11,15 43:3 44:8,21,22 ones 27:9 operates 32:23 33:21 operating 32:12 34:5, 13 39:15 42:2 operation 36:21 42:14 opinion 36:17 46:2 47:19 48:3 50:3 opinions 8:22 opportunities 44:19 ordinary 40:9 46:3 47:14 48:8 Os 13:5	11 36:10,23 37:17,20,23 38:5,7,9,15, 16 39:2,4,7, 19 40:3,5, 18,19 41:15 45:9,18,24 48:9,16,20 49:23 50:16 paragraphs 48:20 49:24 50:13,14,20 51:8 parentheses 29:15,16,20 parenthetical 30:7 part 14:15 16:25 19:14 37:10 38:12,15 39:21 44:25 45:16 48:23 49:7,8 partial 17:9,10 partially 17:8 32:22 42:2 participating 35:23,24,25 41:8,10 particular 16:15 30:7 42:16 48:12 parts 40:22,24 passage 22:23 45:4 patent 7:6,9,10,18, 19 10:10,18, 23 15:7 perception 40:11 performing 42:23	person 40:9 46:3 47:13 48:7 perspective 15:2 40:8 pertain 30:8,19 pertaining 50:14 pertains 30:21 38:7 piece 38:21 44:2,5 place 31:3 places 24:20 26:11 play 13:22 21:11 23:12,14,15 33:11 44:14 playback 18:13 21:3 22:9 28:22 43:11 player 13:10,12 14:22,23 43:3 players 33:22 playing 14:25 15:3 34:10 39:11 43:3,9 44:7 please 4:13 5:7,13 7:20 10:15 12:4 17:22 26:22 30:15, 16 31:15 33:13 36:13 42:20 point 26:2 47:5 pointed 41:7	pointing 10:22 13:4 points 23:17 portion 19:13 24:8 34:11 38:19 39:13 41:15, 24 portions 37:7 41:4 POSITA 33:19 34:8, 23 37:25 38:5 39:2,10 40:13 46:13, 17 50:24 position 13:19,20 20:3,19 25:22 27:16, 22,25 28:9 29:23 30:6 46:8 49:15, 20 50:9 51:7 positions 17:7,13 18:2 19:2,21 22:14 25:3, 10 26:7 27:6,11 possibility 50:6 possibly 47:8 pre-snap 13:16 preceding 38:14 predefined 13:18,22 present 7:11 37:10 pretty 42:6 prevent 5:18,23
P			
p.m. 51:18 page 8:24 9:7,13, 19,24 paragraph 9:24 10:2 15:8 16:5,12 17:5,24 18:5 19:4,6,7,18, 25 20:9 25:5,11,13 27:7 29:5,9, 17 33:18 34:16 35:10,			

previous 21:24	44:3 45:2,13	recall 23:6	refers 22:6 28:5
previously 17:11 42:17	putting 39:8	received 16:6 17:6	regarding 6:20 7:6,15
prior 11:10,12,13, 15 33:9 35:10	Q	20:3,19 29:24	20:7 29:20 32:19
probably 16:20 21:18 31:2	Queens 44:13	recently 4:21	reinforce 40:17
process 30:12,22 32:23 34:13 36:19,21 39:14 41:13, 25 42:14,21	question 5:7,10 16:24 23:15 24:4 27:10 28:25 29:8 33:3,7, 10 35:2,7 38:24 49:18	recess 31:7 51:17	reinforces 50:10
profile 35:24 36:2 41:9 42:17, 22 44:16	questions 5:5,14 6:4, 19 7:19 51:22	recognized 34:9 39:10	reinforcing 46:8
profiles 35:12 36:6 42:7	quote 22:6 44:12, 25	recollection 12:18	relate 8:22
program 14:10,11	quotes 16:13 18:6	record 4:3,14 8:18 31:4,6,10 33:23 35:12 51:14,16,20, 24	related 6:18 10:23
provide 51:9	quoting 25:5	recorded 17:11 22:11	relative 20:24
provided 6:20	R	records 14:16 18:8, 10 21:2 25:17	relevance 45:4
provides 37:15	random 23:25	refer 7:9 32:19	relevant 41:5
providing 5:19,23 47:22	range 16:21	reference 10:18 11:18, 20 24:16 32:16	reliance 45:7
Public 4:6	reach 23:11,20	referenced 24:15	relied 45:12,14
pull 12:4	reacquainted 12:20	references 11:10,13,15 24:12 33:9	relying 37:11
pump 21:7	read 9:10,16,21 10:8	referencing 25:12	remain 51:7
purposes 28:21 39:23 46:7	reader 47:16 50:8	referred 13:16	remind 4:18,22
put 22:19 37:2 40:16,21	realize 44:12	referring 7:18 13:14 19:6,9 22:3, 24 27:14 29:4 30:7 36:4 50:12	rephrase 5:8 20:15
	reason 6:2 7:16		report 37:3
			reported 23:23
			reporter 4:2 5:13 31:5,9 51:15,19
			representatio n 9:5,21 12:24 16:10 20:2 21:13 24:19

25:9 26:4,19 27:23 28:2, 5,20 29:4 30:11 32:14 representatio ns 9:4,6,10,12, 15,17,23 16:2,6 17:3, 5,11,20 18:3,14,23 19:16,19 20:18 24:7, 25 25:15 26:3,12 27:5,12,21 28:6,8,11, 12,15,16,19 29:14,15,22 32:10 34:3 represented 29:3 30:3 representing 12:23 24:2 32:15 33:22 represents 13:8,9,11,12 22:16 26:9 requiring 25:23 resides 35:22 respect 12:13,16 20:21 29:10 31:20 47:2, 23 49:2 response 21:24 24:2,3 25:21 26:22 33:2 39:18 rest 39:3 result 34:11 39:12 retrieve 22:11	review 47:24 reviewed 48:2 50:24 revisit 37:6 right 15:12,23 16:13 18:9 19:7 20:4 29:6,21 30:4 31:25 40:22 41:2 43:24 44:11 45:21 room 6:13,16 route 13:24 rules 4:19,22 14:6 S sake 4:23 save 10:15 saying 16:9 29:3 37:9,14 38:14,25 39:18 40:19, 25 44:17 50:19 says 9:2 10:3 13:15 37:25 scenario 24:10 score 21:9,11,16, 22,25 22:13 23:2,14 24:6,18 25:2,9,22 26:6,11,18 27:5,10,25	28:10,13,18, 24 30:8,10 scrolling 24:21 26:23 29:7 second 9:8,13,19 14:10 16:2, 5,9,23,24 17:3,19 18:13,22 19:9,15,19 20:2,17 24:2 28:7,11,20 29:15,22 33:20,25 34:2,4 35:18 41:20,21 43:22,23 44:9 section 10:24 21:18 22:6 24:22 26:24 28:21 32:16 48:12 sections 33:9 see 8:23,24 13:4 17:17 29:13 33:17 40:21 selected 30:23 selection 30:12 51:3 sentence 10:2 17:17 20:8,25 39:9 45:8 sentences 45:13 separately 47:10 server 35:22 serves 8:20	set 10:6 13:10, 18,22 17:16 24:7 25:21, 24 30:12,23 sets 12:25 13:7 25:14 32:11 34:4 settings 14:6 shoot 18:7,19,20, 25 19:24 shoots 18:9,12 show 26:16 shown 12:9,11,16 45:9 similar 9:13 46:22 47:13 simply 40:16 44:15 46:7 simulated 18:15,17,20 19:22 21:4 22:16 23:9, 16 24:3 26:9 simulating 16:18 simulation 14:13 16:7, 14 17:6 20:4,6,20 28:22 29:24 34:6 simulator 14:12,15 16:16 18:8, 14,19,23 21:2,6 22:10 23:13,18,25 35:21
---	--	---	---

simulators 16:14	specifically 11:10 12:24 15:21 16:8 30:5	substantive 11:6,7	taking 5:18 42:22 44:2
single 35:15 41:17	spell 4:13	suffice 50:8	talk 15:19 31:22 45:20
sir 4:11 5:16, 21,25 6:6,11 7:8,13 8:4 20:5 40:23 45:17 49:22 50:18 51:6, 12	spelled 4:16	suffices 37:4,8	talking 12:8,12 22:25 24:22 25:7 38:17 43:2,5
situation 16:15 22:13 23:18,24 25:8,21 26:3,6,15 27:3,13,15, 17,19	spot 18:18,25 19:24	sufficiently 47:15 48:4	talks 44:13
skill 40:9 46:3 47:14 48:8	stand 45:7,10	summarize 8:25	teaching 12:15 22:23
skills 14:5	start 12:8,12 38:25	summarizes 39:22	team 13:5,8,11 39:8 44:14, 22,23
skip 10:13	starting 12:21 16:20 23:7 50:16	summary 33:18 34:21 37:24	teams 14:8,9 44:9, 10
small 40:12	starts 15:7	Super 43:4	tell 11:12 15:9, 25 33:13 36:13 48:22 49:5
snapped 14:4	state 4:13 13:17 32:20 33:18	support 43:8	testified 4:7
someplace 26:16	statement 9:2	supports 37:5	testimony 5:12 6:8
sort 23:3	states 16:4 23:7 34:22	sure 7:17 10:21, 25 12:17,19 16:12 17:4 21:20 23:4 26:11 33:8	text 44:3
spatial 17:7,13,25 19:2,20 20:2,18 22:14 25:2, 9,22 26:6 27:6 29:23 30:6	step 45:5	sworn 4:6	Thank 31:11
speaking 30:16	store 33:23 35:12	system 17:13 25:17, 20 33:23	thing 9:7
specific 24:12,13 51:3	stored 16:17 23:23 25:20 36:5	table 8:24 10:3	things 8:19 21:12 25:4
	storing 32:8	tailor 43:16	think 10:22 27:8, 10,14 37:22 42:4
	structures 36:7	take 12:3 13:24 15:4,5 31:3 43:18 44:17 45:5 49:16 51:13,23,24	third 9:3,4,5,9, 10,11,14,15,
	stuff 36:9 48:10	takes 21:22	
	submitted 8:11		
	substance 6:8 8:22		

16,20,21,22 23:11 32:8, 9,11,13,14 33:25 34:2, 4,12 36:18, 20 39:13 41:24 42:12 Thomas 10:5 11:17, 23 12:3,10, 12,15,20,22 14:14,19,20 15:6,11,20 16:7,8,19 18:6 19:10, 15 20:20,23 21:8,10,15, 21 22:7,18 23:4 24:5,9, 14,25 25:6, 12,14,19 27:21 28:15, 17,19,22,23 32:7,21 35:8,11 36:11,12,13, 18,24 37:5, 7,15 40:20 42:12,16 43:17 44:19, 25 45:11 46:2,9,14,18 47:2,14,19 48:3,14 49:3,6,9,10, 19,20 50:4 Thomas ' 16:23,25 22:3 27:14 29:4 40:22, 24 thought 30:15 ties 50:17 time 10:15 21:9, 10,11 22:13	23:13,15 24:5,18 25:2,9,22 26:6,11,18 27:5,10,22 28:10,13,18, 24 29:20 30:19,21 times 25:2 today 4:25 5:5 6:13,16 7:5 51:5 today's 10:14 touchdown 23:21 trained 42:7 training 21:3 42:10 transcribed 5:13 treating 40:4 trivial 40:15 49:17 truthfully 5:5 try 21:19 23:20 24:11 trying 17:18 22:2, 22 32:6 33:6,7,8 34:15 38:16, 22 44:5 45:3 turn 29:9 31:15 two 12:25 23:16 28:14 31:24 34:9 38:18 39:11 41:22 43:4 44:9,10	45:12 tying 39:6 type 11:3 typical 18:18,25 19:24 typically 14:21 typographical 11:2,4 U unclear 5:7 understand 4:24 5:4 7:4,7 10:17 11:8 17:18 22:2,22 33:2 34:15 38:13, 16,23 44:6 45:3 understanding 39:17 understood 5:10 33:19 34:23 37:25 38:6 39:3 46:3 upload 35:23 41:8 43:13 44:15 uploaded 42:8,22 user 14:7,10,16 16:18 17:14 18:9,15,17, 20 19:22 21:2,5 22:16 23:9,17,19, 23 24:2 26:9 32:23 33:20, 21 34:6,14	35:16,18,23, 25 36:2,5,6, 22 39:16 41:8,9,10, 19,20 42:3, 7,17,25 43:2,21,22, 23,24 44:8, 9,16,22 user's 14:16 18:11, 16 30:24 users 13:21 34:9 35:13,14,25 39:11 41:16, 22 42:9 45:9 V value 23:22 variety 25:3 verbally 5:14 video 12:23 35:17, 19 41:19,21 43:2 W walk 44:4 want 4:18,21 10:15,21 11:8 43:12, 16 weeks 7:15 window 6:23 withdraw 16:24 28:25 34:25 35:7
--	---	--	---

witness

4:5 20:10

word

46:20,21

47:12,17

48:5,6,12,15

49:14 50:7

words

38:5 46:21,
22

would've

33:19,20

34:9,23

37:25 38:2

39:10 45:21

46:3,14,18

48:10

writes

12:22

written

42:5,6

wrote

8:13,15

20:8,17

X

Xs

13:5

Y

yeah

19:5 21:24

22:5 29:12

33:6 36:17

45:11

Z

zone

23:20