

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

_____	)	
BRYCER, LLC, and	)	
BRYCER MANAGEMENT INC.,	)	
	)	
Petitioners,	)	IPR 2023-01196
	)	
v.	)	
	)	Patent No.
TEGRIS, INC.,	)	11,126,966
	)	
Patent Owner.	)	
_____	)	

Oral Deposition of DAVID H. WILLIAMS

Conducted Remotely via Zoom

Friday, June 21, 2024

9:30 a.m. CDT

Reported by Lisa A. Knight, RDR, CRR, RSA

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

1 Pursuant to Notice, the oral
2 deposition of DAVID H. WILLIAMS was conducted
3 remotely via Zoom on behalf of the Petitioners,
4 at 9:30 a.m. CDT, on Friday, June 21, 2024,
5 reported stenographically by Lisa A. Knight,
6 Realtime Diplomate Reporter, Certified Realtime
7 Reporter, and Realtime Systems Administrator.

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

1 A P P E A R A N C E S

2 (All appearing remotely)

3

4 COUNSEL FOR THE PETITIONERS

5 REICHMAN JORGENSEN LEHMAN & FELDBERG, LLP

6 BY: PATRICK COLSHER, ESQUIRE

7 pcolsher@reichmanjorgensen.com

8 100 Marine Parkway

9 Suite 200

10 Redwood Shores, California 94065

11 650.623.1427

12

13 COUNSEL FOR THE PATENT OWNER

14 FISHERBROYLES, LLP

BY: CHRIS PERQUE, ESQUIRE

15 chris.perque@fisherbroyles.com

2925 Richmond Avenue

16 Suite 1200

Houston, Texas 77098

17 832.604.4417

18

19

20

21

22

1 I N D E X

2 DAVID H. WILLIAMS

3 JUNE 21, 2024

4

5 EXAMINATION OF DAVID H. WILLIAMS:

6 BY MR. COLSHER

6

7

8

9

10

11

12

13

14

15

16

17

18 *STENOGRAPHER'S NOTE: All quotations from
19 exhibits are reflected in the manner in which
20 they were read into the record and do not
21 necessarily indicate an exact quote from the
22 document.

1	DEPOSITION EXHIBITS		
2	NUMBER	DESCRIPTION	MARKED
3	Exhibit 1036	U.S. Patent No. 8,613,109 B2	32
4		(Janoulis et al.)	
5	DEPOSITION EXHIBITS - (Previously Marked)		
6	NUMBER	DESCRIPTION	MARKED
7	Exhibit 1001	U.S. Patent No. 11,126,966 B2	40
8		(Moren et al.)	
9	Exhibit 1005	U.S. Patent Application	98
10		Publication No. 2002/0029222	
11		A1 (Key)	
12	Exhibit 2020	Declaration of David Hilliard	15
13		Williams in Support of Patent	
14		Owner's Response to Petition	
15	Exhibit 2033	2018 Project Standards	109
16	Exhibit 2035	Blog entitled Quantifying the	108
17		High Cost of Delayed Emergency	
18		Response at the Workplace	
19		dated June 14, 2019	
20	Exhibit 2042	Consumer Compliance Outlook,	104
21		Third Issue 2020, The Benefits	
22		of a Proactive Compliance	
		Program by Kathleen Benson	

1 PROCEEDINGS

2 (June 21, 2024, at 9:30 a.m. CDT)

3 DAVID H. WILLIAMS,

4 having been first duly sworn to state

5 the whole truth, testified as follows:

6 EXAMINATION

7 BY MR. COLSHER:

8 Q. Good morning, Mr. Williams.

9 My name is Patrick Colsher, and I'm
10 representing the petitioners in this matter.

11 A. Good morning.

12 Q. Can you state your full name
13 for the record, please.

14 A. David Hilliard Williams.

15 Q. And you understand that you're
16 here today to provide deposition testimony in
17 connection with the declaration that you
18 submitted on behalf of the patent owner,
19 Tegriss, in an inter partes review proceeding
20 involving petitioner, Brycer, and patent
21 owner, Tegriss. And Tegriss is U.S. Patent No.
22 11,126,966.

1 Is that correct?

2 A. Correct.

3 Q. And you're okay if I just
4 shorthand the patent to the "'966 patent"?
5 You'll understand?

6 A. Yes.

7 Q. Okay. You've been deposed
8 before; right?

9 A. Yes.

10 Q. Several times?

11 A. This is about my 40th day of
12 deposition on about 67 matters, more or less.

13 Q. Okay. And some of these have
14 happened in a remote context like today?

15 A. Yes.

16 Q. Okay. I'm going to spare --
17 you know, just in the interest of time,
18 I won't go through the ground rules. You
19 understand, you know, you're here to give
20 accurate and truthful testimony.

21 If you need a break, take a
22 break. All of those good things. If we need

1 to come back to that, we can revisit it.

2 Is that okay?

3 A. Yes.

4 I would like to take a break
5 roughly every hour or so.

6 Q. Absolutely. I'll try to do so.
7 If the clock gets running and either your
8 counsel or you need a break, just -- you
9 know, the only thing I'd ask is if there's a
10 question pending, let's get that on the
11 record, and we can knock off.

12 A. Understood.

13 Q. Did you do anything to prepare
14 for your deposition today?

15 A. I reviewed many of the
16 documents -- or re-reviewed many of the
17 documents and met remotely via counsel two or
18 three times.

19 Q. Other than meeting with your
20 counsel remotely, did you discuss with
21 anybody else in preparation for your
22 deposition today?

1 MR. PERQUE: Objection. Form.

2 A. No.

3 BY MR. COLSHER:

4 Q. Do you recall what documents
5 you reviewed in preparation for your
6 deposition today?

7 A. My declaration, several of the
8 patents, several -- or at least one of the
9 other declarations. And I don't remember
10 beyond that.

11 Q. And is it fair to say that the
12 patent and declarations that you reviewed --
13 and we'll get into this in more detail -- are
14 those that are contained within your
15 declaration, Exhibit 2020, in this
16 proceeding?

17 A. Yes.

18 Q. Okay. And did you review --
19 outside of the materials that you included in
20 your declaration, Exhibit 2020, did you
21 review any other materials in preparation for
22 your deposition today?

1 A. No.

2 Q. Okay. Did you review any other
3 deposition testimony that has occurred in
4 this proceeding?

5 A. No.

6 Q. Okay. In your preparation, did
7 you take any notes?

8 A. No, not that I have anymore.

9 Q. Did you take notes in
10 preparation for your deposition today?

11 A. I took some notes, and then
12 I threw them away, for obvious reasons.

13 Q. Okay. So you no longer have
14 the notes that you took in preparation for
15 your deposition today?

16 A. Correct.

17 Q. Okay. When did you first learn
18 about the IPR that's the subject of your
19 declaration and this deposition?

20 A. With COVID -- I can't even
21 remember if this was -- when did I -- I don't
22 remember. The timing of the world has kind

1 of gotten confused with COVID and everything
2 else.

3 So quite a while ago, but I --
4 without going back to some of the dates on
5 the documents, I don't remember, frankly.

6 Q. Do you recall how you learned
7 about the IPR in this proceeding?

8 A. I think it was through an
9 inquiry about my potential availability and
10 suitability as an expert witness.

11 Q. Are you familiar with
12 Mr. Andrew Moren?

13 A. Yes, I am. He's one of the
14 inventors.

15 Q. And how are you familiar with
16 Mr. Moren?

17 A. He's one of the inventors of
18 the '966 patent.

19 Q. Have you ever discussed the
20 '966 patent with Mr. Moren?

21 A. Yes. I've had two calls with
22 him.

1 Q. Do you recall when those calls
2 took place?

3 A. I think last -- no, I don't
4 remember. It could have been earlier this
5 year or late last year. I don't remember,
6 frankly.

7 Q. Have you ever exchanged any
8 written materials with Mr. Moren?

9 A. No.

10 Q. Have you ever reviewed any
11 materials authored or signed by Mr. Moren in
12 connection with this proceeding?

13 A. I've reviewed his declaration
14 in this matter.

15 Q. Do you recall when you first
16 reviewed his declaration in this matter?

17 A. No.

18 Q. And you signed your declaration
19 on April 17th of 2024.

20 Do you recall approximately how
21 long before you signed your declaration that
22 you first reviewed Mr. Moren's declaration?

1 MR. PERQUE: Objection. Form.

2 A. First reviewed or -- I mean,
3 I reviewed it again for this deposition.

4 But first reviewed, no,
5 I don't. I mean, it's -- like I said, time
6 has become hazy, unfortunately.

7 BY MR. COLSHER:

8 Q. Was it more than a day before
9 you signed your declaration?

10 A. I'm sure.

11 Q. More than a week?

12 A. Probably.

13 Q. I'll ask one more, and I don't
14 know if we'll get there. But more than a
15 month?

16 A. Possibly. I mean, it's --
17 I just don't know.

18 Q. Okay.

19 Are you familiar with Leroy
20 McNulty?

21 A. Yes, though I forget exactly
22 what the role he played in all of this was.

1 Q. Have you ever had any
2 discussions with Mr. McNulty?

3 A. I think he was -- and I'm
4 qualifying this because I might be wrong.
5 I think he was part of at least one of the
6 discussions I had with Mr. Moren.

7 Q. Other than Mr. Moren and
8 Mr. McNulty, was anyone present for the
9 discussions that you had?

10 A. Counsel.

11 Q. Did you rely on any of the
12 information that either Mr. McNulty or
13 Mr. Moren provided you during those
14 discussions in forming your opinions in this
15 inter partes review?

16 A. I think I cited various passages
17 of Mr. Moren and maybe one citation
18 generally -- generically to Mr. McNulty.

19 Q. Are you aware whether
20 Mr. McNulty authored a declaration that was
21 submitted in connection with this IPR?

22 A. I think he did.

1 Q. I'll help you out here.

2 (Previously marked Deposition
3 Exhibit 2020, Declaration of David
4 Hilliard Williams in Support of Patent
5 Owner's Response to Petition, was
6 tendered to the witness.)

7 Q. Do you have your declaration in
8 front of you, Exhibit 2020?

9 A. Yeah. Yeah.

10 Yes, I did --

11 Q. Okay.

12 A. -- review that.

13 Q. Great.

14 Sorry. I'm not trying to make
15 this a memory test. I'm just trying to get
16 some background here.

17 Do you recall when you first
18 reviewed the declaration of Mr. McNulty in
19 preparation for your declaration that was
20 submitted in this IPR?

21 A. I think it was roughly around
22 the time of reviewing Mr. Moren's, but

1 I don't remember the time frame for either of
2 them.

3 Q. But it was more than one day
4 before you signed your declaration?

5 A. Yes, I'd say.

6 Q. And more than a week before you
7 signed your declaration?

8 A. Yes, I'd say that's probable.

9 I mean, like I said, I think
10 so, but I could be wrong.

11 Q. Okay. Are you familiar with
12 Michael Miller?

13 A. He was also a declarant. And
14 I did review his declaration but not
15 re-reviewed it for this deposition. And
16 I don't remember his role.

17 Q. Okay. And have you ever had
18 any discussions with Mr. Miller regarding
19 this IPR?

20 A. I don't think so.

21 I'm hazy on who else was on the
22 call with Mr. Moren. I don't think he was.

1 So I don't think I did have a conversation
2 with him.

3 Q. And do you recall when you
4 first reviewed Mr. Miller's declaration in
5 connection with the preparation of your
6 declaration that was submitted in this IPR?

7 A. No.

8 Q. Do you recall whether it was
9 more than a week before you signed your
10 declaration in this IPR?

11 A. Frankly, it's a guess -- but
12 it's a reasonable guess -- that I did it
13 around the time I did the -- reviewed the
14 other declarations of Mr. Moren and
15 Mr. McNulty. But I don't know for sure.

16 Q. Would you have records of when
17 you reviewed each of these declarations of
18 Mr. Moren, Miller, and McNulty in connection
19 with the preparation of your declaration that
20 was submitted in this proceeding?

21 A. Are you talking about
22 originally or in preparation for this

1 deposition?

2 Q. I'm talking originally.

3 A. No.

4 Q. Are you being compensated for
5 the time spent in the actual IPR?

6 A. Yes.

7 Q. And how are you being
8 compensated?

9 A. I'm not sure what you mean.

10 I mean, I charge an hourly rate
11 that I bill at the -- generally sometime
12 after the end of the month, and then, you
13 know, eventually get paid.

14 Q. Okay. Do you recall approximately
15 how many hours you have billed to date on this
16 proceeding?

17 A. No.

18 Q. More than 50?

19 A. Yes.

20 Q. More than 100?

21 A. I'm not sure.

22 Q. Okay. Now looking at

1 Exhibit 2020, which is the declaration you
2 submitted in this proceeding.

3 Who wrote your declaration?

4 A. I wrote the vast majority of
5 it, and then the rest was in collaboration
6 with counsel.

7 Q. Did you write your first draft
8 of this report?

9 A. (Document[s] reviewed.)

10 I don't remember.

11 I have a variety of shells for
12 IPRs that I sometimes utilize and sometimes
13 the shell is provided by counsel.

14 And I think I provided the
15 shell in this, but I don't remember for
16 certain.

17 Q. Would you have records of who
18 authored the first draft of this IPR?

19 MR. PERQUE: Objection. Form.

20 A. I'm not sure.

21 I don't think so, but I don't
22 know.

1 BY MR. COLSHER:

2 Q. How were drafts exchanged
3 between you and counsel for this IPR?

4 A. We used, you know, an online
5 Dropbox-type thing.

6 Q. Mr. Williams, you worked in the
7 field of asset management and related
8 capabilities; right?

9 MR. PERQUE: Objection. Form.

10 A. Yes.

11 BY MR. COLSHER:

12 Q. Okay. Did any of those, the
13 assets and related capabilities, involve
14 life-saving systems or assets?

15 A. Yes.

16 Q. What were those life-saving
17 systems or assets that you worked with?

18 A. Well, my company name is
19 E911-LBS Consulting. "E911" stands for
20 Enhanced 911, which is about 911 systems and
21 technologies.

22 And so there is -- associated

1 with that is all sorts of various ecosystems
2 or parts of ecosystems, including public-
3 safety answering points and dispatchers and
4 how those systems work, like, with
5 integrating with the fire department and
6 police systems. And then I have a variety of
7 other experience.

8 Q. Do you have an understanding of
9 what a life-safety system is?

10 A. It's the ES -- one of those
11 terms that, you know, I don't think has a
12 very -- has an exact wording by everyone
13 whoever uses it. But certainly generally.

14 Q. And what would be your general
15 understanding of what a life-safety system
16 is?

17 A. I'd say systems and associated
18 assets and processes that are involved in
19 providing life-safety services.

20 Q. What is a life-safety service
21 that you referred to in your last answer?

22 A. Well, I'm kind of constructing

1 this on a fly, but certainly examples would
2 be many types of fire, police, emergency --
3 EMT-type services associated with fighting
4 fires, crimes, responding to incidents --
5 health incidents, et cetera.

6 Q. Would a sprinkler system qualify
7 as a life-safety system?

8 A. A fire sprinkler system would.

9 Q. What about a building sprinkler
10 system?

11 A. If it was a fire sprinkler
12 system.

13 Q. So in order to qualify as a
14 life-safety system, it has to be related to
15 fire; is that right?

16 A. It could be others -- forms of
17 safety-related pieces. But like in the case
18 of your sprinkler system, I would not view a
19 lawn sprinkler system as a life-safety, but
20 I would view a fire sprinkler system as a
21 life-safety.

22 Q. So the location of the

1 sprinkler system is what determines whether
2 it's for life safety; is that right?

3 A. No.

4 Q. How would I determine whether a
5 particular system was life safety or not?

6 A. Well, I haven't done a full
7 analysis of every possible permutation and
8 metes and bounds associated with the term,
9 but, in general, it would have to do with
10 either the prevention of and/or the
11 responding to, in that -- in the fire
12 sprinkler context, fires.

13 Q. Outside of the fire area, are
14 there any other life-safety systems?

15 A. I think I provided a listing of
16 a variety of those in my declaration, ranging
17 from fire alarms to standpipe systems to
18 extinguishers and so forth.

19 Q. What makes a standpipe system
20 qualify as a life-safety system?

21 A. I would say that without it --
22 or without a functioning one, it could

1 potentially inhibit, perhaps severely, the
2 ability for a fire department to respond to a
3 fire in the building where the standpipe
4 system is.

5 Q. So what makes a standpipe
6 system a life-safety system as it's used in
7 conjunction with fire prevention?

8 A. It is providing the liquid --
9 the water -- necessary, as well as access to
10 the water for a firefighter to tap into to
11 fight a fire.

12 Q. If we could go to Exhibit 2020,
13 which is your declaration, and scroll down to
14 page 18, and particularly paragraph number
15 43, at the bottom, where you're discussing
16 the knowledge of a person of ordinary skill.

17 A. Yes.

18 Q. The first sentence says
19 "Included in the above" -- which is referring
20 back to paragraph 42 -- "is knowledge of
21 life-safety systems, including fire systems,
22 fire alarms, and/or building sprinkler

1 systems."

2 A. Right.

3 Q. Why did you choose those
4 life-safety systems as part of your
5 understanding of a person of ordinary skill
6 in the art?

7 A. I don't recall specifically,
8 but if I had to -- just reacting to that
9 question now, I think those would be systems
10 or equipment that somebody who wasn't
11 familiar with the details of life-safety
12 systems would readily recognize.

13 Q. In 2007, did you have any
14 experience designing life-safety systems for
15 fire hydrants?

16 A. "Designing"? Is that what you
17 said?

18 Q. Yes.

19 A. Not designing.
20 I certainly was familiar with
21 them.

22 Q. How were you familiar with

1 life-safety systems for fire hydrants?

2 A. Well, again, in my E911
3 experience, I was exposed to a very large
4 number of what I would call downstream
5 systems from the public-safety answering
6 point, including those kinds of systems.

7 Q. In your E911 business, did you
8 ever work with systems for the inspection,
9 maintenance, or testing of fire hydrants?

10 A. No, I don't think so.

11 Q. In your -- prior to 2007 or --
12 strike that.

13 Prior to 2008, did you ever
14 work with systems for the inspection,
15 maintenance, or testing of fire alarms?

16 A. I don't think so.

17 Q. And prior to 2008, did you ever
18 work with systems for the inspection,
19 testing, or maintenance of building sprinkler
20 systems?

21 A. I guess the answer is yes,
22 somewhat.

1 Q. Are you able to expand on your
2 answer as to what you're referring to as
3 "yes, somewhat"?

4 A. Sure. Let's see if I can
5 phrase this.

6 Somewhere in the early 2000s --
7 I can't remember exactly when -- I was
8 involved and the only engineer involved in a
9 dispute between the City of St. Louis water
10 and sewage operation and residents of Lake
11 St. Louis lakes.

12 They wanted to replace their
13 gravity sewer system with a pump station --
14 or a series of pump stations, and the
15 residents did not want that to happen.

16 So I was heavily involved in
17 essentially combatting that effort
18 successfully, ultimately. And that involved
19 getting into the various water usage and the
20 collection and drainage and runoff systems of
21 the various residences, including sprinkler
22 systems.

1 Q. Other than your experience in
2 this legal dispute involving the City of
3 St. Louis, do you have any other experience
4 before 2008 working with systems for the
5 inspection, testing, or maintenance of
6 building sprinkler systems?

7 A. I don't believe so.

8 Q. Okay. And in your work in
9 connection with this dispute, you were
10 evaluating the functionality of the sewer
11 systems and with the pumps and potentially
12 placement of that?

13 A. Yes, as well as what I would
14 call the upstream systems, including
15 sprinkler systems of all sorts, that would
16 generate water runoff that would flow into
17 the sewage system.

18 So the more sprinklers you
19 have, for example, then more water that
20 potentially would run off, the greater the
21 flow into the sewer system, and thus
22 affecting the capacity and throughput of

1 those sewer systems.

2 Q. So your work entailed how the
3 systems functioned or would change as a
4 result of the proposed modifications?

5 A. Potentially. That was part of
6 the issue, is that -- to evaluate all the
7 upstream changes that might result from
8 having a gravity-based system versus all
9 these pump stations, which is essentially
10 trying to store sewage and runoff, literally
11 lift them up, pump them up to a higher
12 elevation, and then send them on through a
13 new system.

14 The sewage system gravity
15 system used in the existing and current Lake
16 St. Louis system fed under the lake, which
17 was part of the concern, that if the pipes
18 broke, what would happen to the lake.

19 Q. Later I'd like to hear about
20 the result, but for the purpose of this --

21 A. I can tell you: We won. And,
22 in fact, much of the water and sewer district

1 engineering department apparently resigned
2 and went elsewhere.

3 Q. Okay. Well, I guess I got to
4 the punch line at the end.

5 A. Yeah. It's kind of
6 mind-blowing.

7 Q. Prior to 2008, did any of your
8 work in connection with the information,
9 testing, or maintenance of building sprinkler
10 systems involve work on asset-management
11 functionalities?

12 A. I would say that work had an
13 asset-management capability or functionality
14 associated with it, particularly since it
15 was -- that system was installed literally,
16 like, 50 years prior.

17 And there was -- the ability to
18 figure out what was where and how old it was,
19 whatever, was extremely fragmented and on
20 paper scattered throughout current and old
21 systems. And so there was definitely a major
22 issue in asset tracking associated with that

1 whole matter.

2 Q. Did your work on this matter
3 entail any design or development of systems
4 related to asset tracking for these building
5 sprinkler systems?

6 A. I can't recall. I don't think
7 so, but I'm not sure.

8 Q. Did you obtain any college
9 degrees?

10 A. I have two.

11 Q. And, just generally, tell me
12 what those degrees are in.

13 A. I have a Bachelor of Science in
14 Electrical Engineering, focused on computer
15 design, from Purdue University in 1983, and
16 what I characterize as a Technology MBA from
17 the University of Texas at Austin in 1987.

18 Q. Other than your degrees from
19 Purdue and the University of Texas, do you
20 have any other post high school education?

21 A. Not from a degree standpoint,
22 no.

1 Q. All right.

2 Mr. Williams, do you have an
3 understanding of what "database" is?

4 A. Yes.

5 Q. And what is your understanding
6 of what "database" is?

7 A. Generically, it's a way or ways
8 of managing data.

9 Q. I'm going to put into the Chat
10 Exhibit 1036, which is a new exhibit that I
11 am marking for this deposition. And it is,
12 in particular, U.S. Patent No. 8,613,109.

13 (Deposition Exhibit 1036, U.S.
14 Patent No. 8,613,109 B2 (Janoulis et
15 al.), was marked for identification.)

16 Q. Are you able to access this,
17 Mr. Williams?

18 A. I got it.

19 Q. Are you familiar with the
20 document that's been marked as Exhibit 1036
21 in this proceeding?

22 MR. PERQUE: Give me one

1 moment, Counsel, while I download it.

2 MR. COLSHER: Of course.

3 (Pause.)

4 THE DEPONENT: Let me know when
5 you've got it, Chris.

6 MR. PERQUE: Yeah. One second,
7 if you don't mind.

8 THE DEPONENT: Actually, while
9 we're doing that, could I take, like,
10 a five-minute break?

11 MR. COLSHER: Of course.

12 (Recess: 10:04 a.m. to
13 10:07 a.m.)

14 BY MR. COLSHER:

15 Q. Before we went off the record,
16 Mr. Williams, I introduced an exhibit marked
17 1036, which was U.S. Patent No. 8,613,109.

18 Do you have that exhibit with
19 you?

20 A. I do.

21 Q. Are you familiar with the
22 patent that's been labeled as Exhibit 1036?

1 MR. PERQUE: Objection. Beyond
2 the scope.

3 A. Yeah. It's a blast from the
4 past.

5 The first patent I was ever
6 named -- a named inventor on when I was a
7 consultant working for AT&T. I was one of
8 several inventors and the only nonemployee
9 inventor on this patent.

10 BY MR. COLSHER:

11 Q. Okay. And let's go to
12 Exhibit 2020, which is your declaration.
13 And, in particular, I want to point you to
14 page 11, paragraph 24. And it's in the last
15 sentence in paragraph 24, which is discussing
16 your background and qualifications for this
17 proceeding.

18 It says "This work in
19 location-related data security and privacy
20 networking resulted in a patent, U.S. Patent
21 No. 8,613,109, titled Method and Apparatus
22 for Providing Mobile Social Networking

1 Privacy that issued on December 17th, 2013,
2 of which I was the only nonemployee
3 inventor."

4 Is this the same patent that
5 you are referencing in paragraph 24 of
6 Exhibit 2020 that has been marked as
7 Exhibit 1036 in this proceeding?

8 A. It sure looks like it. Yes.

9 Q. And you provided your opinion
10 that part of your qualifications for this
11 proceeding is your work as an inventor on
12 this patent; is that correct?

13 A. (Document[s] reviewed.)

14 The full context, it was in my
15 Background section in the declaration. This
16 was discussing -- this patent illustrated
17 some of the work that I did for AT&T around
18 location-related data security and privacy.
19 And then that part -- and that AT&T work also
20 involved a variety of asset-management
21 systems.

22 So it was -- it's all part of

1 the same or similar context in my work at
2 AT&T.

3 Q. And so you consider your work
4 at AT&T relevant to the qualifications as an
5 expert to speak on one of skill in the art in
6 connection with this proceeding? Is that
7 right?

8 A. Some portions of it,
9 particularly my work with asset-management
10 systems with -- working at AT&T.

11 As I state in my declaration,
12 "I have worked extensively in the field of
13 asset management and related capabilities."

14 "For example, my work with
15 asset-management systems with AT&T involved
16 alert-based centralized dispatch and remote
17 control over local control systems, triggered
18 off of certain location, location
19 area/geofences, and asset-related conditions,
20 metrics, and time-based events."

21 That's paragraph 23.

22 Q. Okay. And as part of that, you

1 referenced your patent as being relevant to
2 your qualifications; right?

3 A. I included that as part of
4 illustrating the breadth of my -- and depth
5 of my AT&T work.

6 Q. Do you not consider this patent
7 relevant to your qualifications to provide
8 your expert opinion from the perspective of
9 one of ordinary skill in the art in this
10 proceeding?

11 A. I would say it's relevant.

12 Q. I just want to take a quick
13 look at column number 2 of Exhibit 1036,
14 which is page 5. And, in particular, I want
15 to look at lines 26 through 31.

16 And let me know when you're
17 there.

18 A. I'm sorry -- oh. We're still
19 on the same thing. Column 5. What was that?

20 Q. Sorry. Column 2.

21 A. Column 2. Okay.

22 Q. It's on page 5 of the document.

1 A. Oh. I see. I see.

2 Q. And, in particular, I want to
3 look at column 2, lines 26 through 31.

4 A. Okay.

5 Q. And the first sentence there
6 says that "The application server 112 may
7 comprise any server or computer that is
8 well-known in the art, and that the database
9 115 may be any type of electronic collection
10 of data that is well-known in the art."

11 Do you agree that databases may
12 be any type of electronic collection of data
13 that were well-known in the art?

14 MR. PERQUE: Objection. Beyond
15 the scope.

16 A. I haven't looked at this patent
17 in several years, so I would want to go back
18 and look at all of it.

19 So, I mean, I think as a
20 general statement, databases are actually
21 technical constructs, so I would want to go
22 back and look at the full context of this

1 patent, which I haven't looked at in
2 several years.

3 BY MR. COLSHER:

4 Q. Sitting here today, do you have
5 any reason to believe that the statement in
6 column 2, lines 26 through 29 of
7 Exhibit 1036, is not accurate?

8 MR. PERQUE: Objection. Beyond
9 the scope.

10 MR. COLSHER: For the record,
11 Counsel, he provided his opinion
12 based, in part, on this patent.

13 BY MR. COLSHER:

14 Q. But you can answer,
15 Mr. Williams.

16 A. I would say it's accurate in
17 the full context of this patent.

18 Q. And databases were well-known
19 by 2008; is that correct?

20 MR. PERQUE: Objection. Form.

21 A. That's fair.

22 ///

1 BY MR. COLSHER:

2 Q. And databases were well-known
3 by 2007; is that right?

4 MR. PERQUE: Same objection.

5 A. The database concept was known
6 by then, yes.

7 BY MR. COLSHER:

8 Q. Let's take a look at
9 Exhibit 1001, which is the '966 patent in
10 this proceeding.

11 (Previously marked Deposition
12 Exhibit 1001, U.S. Patent No.
13 11,126,966 B2 (Moren et al.), was
14 tendered to the witness.)

15 Q. Do you have a copy,
16 Mr. Williams?

17 A. Yes.

18 MR. COLSHER: And, for the
19 record, I am going to put this
20 Exhibit 1001 also into the Chat, in
21 case anybody needs it electronically.

22 And, at the same time, I'm

1 going to put Exhibit 2020, which is
2 the declaration that we've been
3 discussing so far.

4 And if I miss any other
5 exhibits we're discussing, someone
6 just holler, and I'll make sure they
7 get in the Chat as well.

8 BY MR. COLSHER:

9 Q. So looking at Exhibit 1001,
10 which is the '966 patent. And, in
11 particular, let's take a scroll over to
12 page 27 of the marked exhibit. And that's
13 what is shown in columns 1 and 2.

14 If you could let me know when
15 you're there.

16 (Pause.)

17 A. I'm there.

18 Q. And if you go down to line
19 number 63 in column number 1; and, in
20 particular, it goes from line 63 to 66.

21 And it states "A typical fire
22 hydrant management software program allows

1 the user to input hydrant information,
2 schedule maintenance, and create reminders
3 for service."

4 Does the '966 patent invention
5 rely on a typical fire hydrant management
6 software program as described in column 1,
7 line 63 to 66?

8 MR. PERQUE: Objection. Form.

9 A. I'm not sure what you mean by
10 "rely on."

11 Certainly fire hydrant
12 management software plays a key role in the
13 actual claims.

14 BY MR. COLSHER:

15 Q. Does the description of fire
16 hydrant management software in column 1, line
17 63 through 66 of the '966 patent, correspond
18 to the claimed fire hydrant software
19 management software that is claimed in the
20 challenged claims in the '966 patent involved
21 in this proceeding?

22 MR. PERQUE: Objection. Form.

1 A. Again, the question is a little
2 awkward.

3 I would say that that statement
4 is describing key attributes of fire hydrant
5 management software, e.g., allowing the user
6 to input hydrant information, schedule
7 maintenance, and create reminders for
8 service.

9 BY MR. COLSHER:

10 Q. And those were the typical fire
11 hydrant management software that was in
12 existence as of the time of the invention in
13 the '966 patent; is that correct?

14 MR. PERQUE: Objection. Form.

15 A. I'm not sure this phrasing --
16 I don't know the scope of the inventor's use
17 of the word "typical," whether that was kind
18 of aspirational or it was describing
19 something else. I just don't know.

20 BY MR. COLSHER:

21 Q. So you don't have an understanding
22 of what the '966 patent refers to as "typical"

1 in column 63 -- strike that.

2 So you do not have an understanding
3 of the use of the word "typical" in column 1,
4 line 63 to 66, of the '966 patent as used
5 therein?

6 A. I don't have insight into the
7 mind of the inventor when they used that
8 adjective/adverb -- I'm not sure -- whether
9 they were just referring to what a fire
10 hydrant management software system needs to
11 have or they were also -- had something else
12 in mind. I just don't know.

13 Q. And that statement occurs in
14 the Background section of the '966 patent;
15 right?

16 A. Yes.

17 Q. In this sentence in column
18 number 1, lines 63 through 66, what is "the
19 user" being referred to in the line number
20 64?

21 A. Similar answer. I don't know
22 what the -- was in the mind of the inventor.

1 I'd have to go back -- in terms of specifics,
2 I can't answer off the top of my head
3 basically.

4 Again, this was in the
5 Background of the Invention section.

6 Q. So sitting here today, you have
7 no opinion as to what "the user" is referring
8 to in column 1, line 63 through 66; correct?

9 A. Well, I'd say, just looking
10 above that, starting in line -- column 1,
11 line 41, it says "The hydrant is usually
12 inspected by a range of individuals,
13 including, but not limited to, a citizen, an
14 owner, a water purveyor, a firefighter,
15 and/or a fire marshal."

16 It would be reasonable to
17 expect at least a portion of those would be
18 considered a user, but I don't think that
19 passage collectively defines what a user is.

20 So it's -- I can't say
21 definitively what it includes or doesn't
22 include.

1 Q. Okay. Would you agree that
2 column 1, line 63 through 66, is referring to
3 a single user?

4 A. (Document[s] reviewed.)
5 I'm not sure I could state that
6 definitively either.

7 It could be kind of a -- it
8 could be -- well, let me back up.

9 I've seen in other instances --
10 not in this case -- where the user is just
11 talking about a type or class of user or a
12 user, while in the singular, it was actually
13 referring to a plurality or a group or what
14 have you.

15 So since I don't see the word
16 "user" specifically anywhere before that
17 statement, I can't answer definitively
18 whether it's plural or singular.

19 Q. But you would agree that in
20 this sentence, it is a singular user.
21 Correct?

22 A. I just answered that.

1 I don't know for certain how
2 they intended to use that term, given that
3 context, whether they were thinking singular
4 or plural.

5 It's just not -- again, it's in
6 the Background of the Invention as opposed to
7 getting into the particular claims matter.
8 So I don't know how specific or careful they
9 were in terms of how they used their words.
10 I just don't know.

11 Q. Okay. And then let's look over
12 at column 2, which is continued on this
13 paragraph. And if you look at line number 5,
14 it says "In fact, none of them communicate
15 with other users who use the same program..."

16 Does the plural use of "user"
17 in this column 2, lines 5 through 6, inform
18 your understanding of the singular use of
19 "user" in column 1, line 63 to 66?

20 A. I mean, I think it's clear that
21 one of the variations of this use of "user"
22 or "users" is that there's -- that user can

1 include at least the singular user.

2 But a variation of what I've
3 just said, it could potentially be referring
4 to a user type or class, with other user
5 types or classes. It's just not specified.

6 Q. Okay. And would you agree that
7 the user that's being described of this
8 typical fire hydrant management software
9 program in column 1, lines 63 to 66, must
10 perform the functions of inputting hydrant
11 information, scheduling maintenance, and
12 creating reminders for service?

13 A. I wouldn't use -- the use of
14 the word "must" isn't stated here.

15 It says "A typical fire hydrant
16 management software program allows user to
17 input hydrant information, schedule
18 maintenance, and create reminders for
19 service."

20 That's -- verbally that's not
21 the same as "must." But, again, this is the
22 Background -- the Technology section. So

1 I'm -- it doesn't seem they were defining
2 particular claim elements, per se, but just
3 providing contextual background of the
4 invention for the details that were to come.

5 Q. Okay. So now that we have the
6 '966 patent out, let's shift over to claim
7 number 8. And that is on the very last page,
8 which is page number 34. And it's found in
9 column number 15.

10 If you can let me know when
11 you're there.

12 A. I'm there.

13 Q. Claim 8 requires a fire hydrant
14 management software; right?

15 A. About a computer-implemented
16 method for using the fire hydrant management
17 software.

18 Q. Okay. And it requires a fire
19 hydrant management software to be used;
20 right?

21 A. (Document[s] reviewed.)

22 Fire hydrant software is

1 clearly involved.

2 Q. What do you mean by "involved"
3 in the claim?

4 A. Well, it's a computer-
5 implemented method for using a fire hydrant
6 management software.

7 So that's a generically -- is
8 what I mean by the generic use of "involved."

9 Q. So "involved" in this context
10 means "used"; is that right?

11 A. I would just -- I'm not going
12 to paraphrase claim elements because wording
13 is important -- or go through a thesaurus
14 exercise.

15 The claim says "A computer-
16 implemented method for using a fire hydrant
17 management software..."

18 And then throughout the claim
19 and other claims, there is use -- there is
20 various usage of the term "fire hydrant
21 management software."

22 Q. Mr. Williams, you offered your

1 opinion as to the claim interpretation of
2 claim 8 through 16 of the '966 patent; right?

3 A. I'm sorry. Repeat that
4 question.

5 Q. You offered your opinion as to
6 the claim interpretation of claims 8 through
7 16 of the '966 patent for this proceeding;
8 right?

9 A. I'm not sure "interpretation"
10 is the right word. But certainly I performed
11 analysis with respect to claim 8 of the '966
12 patent and the prior art submitted by the
13 petitioner.

14 Q. And you understand that in a
15 validity analysis or an obviousness analysis,
16 the first step is to interpret the claims.
17 Right?

18 A. Yeah, I guess that's fair.

19 Q. Okay. So I just want to be
20 clear: When I'm asking you about claim
21 terms, I'm asking you about opinions that you
22 offered in determining the positions that you

1 took in your declaration. Okay?

2 A. Okay.

3 Q. Okay. And a database is

4 claimed in claim 8; right?

5 A. (Document[s] reviewed.)

6 Yes.

7 Q. I'll help you out. There is

8 the -- I believe the first use of "database"

9 occurs between lines 28 and 29, column 15.

10 A. Right. What I think we're

11 calling "8b." Yes.

12 Q. Yeah. Right.

13 It's -- in the wording that the

14 parties have been using, it's been element b.

15 A. Correct.

16 Q. I think, anyways.

17 Does claim 8 require any

18 particular data to be stored within the

19 claimed database?

20 A. (Document[s] reviewed.)

21 Well, as 8b describes, it's

22 "real-time records of assets from a

1 database." So that would mean, to me, that
2 real-time records of assets would be stored
3 in the database.

4 Q. Other than real-time records of
5 assets, does claim 8 require any other data
6 to be stored within the claim database?

7 A. (Document[s] reviewed.)

8 Well, there's various other
9 places in claim 8, starting with what I think
10 is 8e, "storing in a database in association
11 with the asset, the asset information" --
12 excuse me -- "the inspection information" and
13 "wherein the inspection information is
14 accessible to the users, and updating the
15 database and associated with the asset based
16 upon the inspection information."

17 So it's definitely, in my view,
18 discussing in that context information about
19 inspection information.

20 Elsewhere in the patent, there
21 is also descriptions of how the -- for
22 example, the owner of the asset -- I'm in

1 1(d) -- "the owner of the asset, upon
2 remotely accessing the fire hydrant
3 management software compliance registry, may
4 update and review the status of the assets."

5 In my view, a POSA would
6 realize that that updating and reviewing,
7 although drawing from, is coming to and from
8 a database.

9 Q. Okay. I just want to clarify
10 one little thing for the record.

11 When you were referring to the
12 "storing in the database" limitation, that's
13 the limitation that we were talking about
14 that was in column number 16, beginning at
15 line number 3 through line 8; is that right?

16 A. Yes.

17 Q. Okay.

18 A. And I think we have referred to
19 it as "8e."

20 But, yes.

21 Q. 8e, -f, -g. Something.

22 A. Yeah. It's -e, -f, -g.

1 Something like that.

2 But, yes, the columns that
3 you -- and line items you described are
4 accurate.

5 Q. Great.

6 Does claim 8 specify how any of
7 the records or information that you have
8 described is stored in the database?

9 A. (Document[s] reviewed.)

10 What do you mean by "how"?

11 Are you meaning technically?

12 Are you describing functionally
13 or from a process standpoint?

14 Q. I would like to know whether
15 claim 8 requires any particular way that the
16 information you described is stored within
17 the database.

18 MR. PERQUE: Objection to form.

19 A. I'd answer it the same way.

20 Are you referring to technical
21 structure or functional process? Temporally?

22 I am just saying, "how stored

1 in the database" is frankly too simplistic.

2 BY MR. COLSHER:

3 Q. Okay. Does claim 8 require
4 that the database be organized in any
5 particular manner?

6 MR. PERQUE: Objection to form.

7 A. Well, there's definitely, as
8 we've talked about in part, functional
9 requirements, in terms of -- you know, for
10 example, storing of inspection information.

11 There's also what I would call
12 process elements, in terms of who was
13 inputting and/or retrieving and/or reviewing
14 the data at any given time and at any given
15 manner.

16 And then to cap it off, the
17 specification describes what's called a
18 database schema in Figure 4A and -B that
19 describes specifically the database schema,
20 which is the various data types, groups,
21 elements, and their interrelationship to each
22 other.

1 So, yes, I think it does.

2 BY MR. COLSHER:

3 Q. So claim 8 -- strike that.

4 So in order to meet a database
5 limitation in claim 8, it requires the use of
6 the schema as described in Figures 4A and 4B
7 in the '966 patent?

8 MR. PERQUE: Objection to form.

9 A. It doesn't require. There's
10 nothing in the claim elements.

11 But you asked me to interpret
12 this claim. And I'm interpreting the claim
13 in the context of the claim description and
14 the specification. And this is part of the
15 specification.

16 So this is illustrating a way
17 in which the described '966 system could
18 implement the database portions of those
19 elements.

20 Does it require that specific
21 schema and interrelationships? No. It's
22 illustrating.

1 BY MR. COLSHER:

2 Q. Would a collection -- strike
3 that.

4 Would an electronic collection
5 of the data required to be stored in a
6 database in claim 8 meet the claim
7 requirement of "database" in claim 8?

8 MR. PERQUE: Objection to form.

9 A. Potentially.

10 The devil's in the details and
11 not all database management systems are
12 equal. So the more data elements, the more
13 complex the interrelationship between the
14 data elements.

15 The complexity and size of the
16 attributes associated with those database
17 types and the interrelationships and the
18 scale or volume of how many data records are
19 involved all contribute to the actual
20 tactical and practical selection and
21 implementation of database management.

22 ///

1 BY MR. COLSHER:

2 Q. Does claim 8's database specify
3 the scale and the volume of the data records?

4 A. No.

5 Q. Does claim 8 specify the types
6 and interrelationships that are required to
7 meet to be included in the database?

8 MR. PERQUE: Objection to form.

9 A. Yes, to some degree.

10 BY MR. COLSHER:

11 Q. How does claim 8 specify the
12 scale and volume of the data records that are
13 required to meet claim 8's limitation of
14 database?

15 A. Well, you asked a different
16 question.

17 Your first question was about
18 scale. This last question, at least the way
19 I heard it, was about just types of
20 information.

21 Q. Let me repeat my question to
22 see if I can -- my follow-up question was:

1 How does claim 8 specify the scale and volume
2 of the data records that are required to meet
3 claim 8's limitation of database?

4 MR. PERQUE: Objection to form.

5 A. It doesn't describe scale.
6 That was my -- what I thought was the answer
7 to your first question.

8 BY MR. COLSHER:

9 Q. And claim 8 also doesn't
10 describe volume?

11 A. That's correct.

12 Q. Okay. And claim 8's database
13 doesn't describe the complexity and size of
14 attributes either; right?

15 A. It does to some degree, in
16 talking about inspection information.

17 And a POSA would realize that,
18 you know, for some assets, that could become
19 quite complex as well as the interrelationships
20 between who can access and how and what needs
21 -- what data elements need to be leading to
22 other data elements.

1 That's really the point of the
2 schema illustration, to show that it's not
3 just this kind of simple storage and
4 retrieval process. It has -- it's very
5 complex. Sophisticated.

6 Q. Claim 8 requires a complex and
7 sophisticated database?

8 Is that what you're telling me?

9 A. I'm saying that it doesn't
10 require a complex and sophisticated database.

11 In my view, the illustrative
12 data schema in 4A and 4B, I would characterize
13 that as maybe just -- "sophisticated" is a
14 better word, but "complex" is also
15 potentially.

16 But there's nothing in the
17 claims that require or specify you must have
18 a complex and sophisticated database. That
19 is not in there.

20 Q. Okay. So I'm just trying to
21 get sort of box drawing exercise in my mind
22 of what would fall into "database" in the

1 claim or if there's anything particularly
2 unique to the database that is claimed in
3 claim 8.

4 MR. PERQUE: Objection to form.

5 A. Well, again, the claim 8
6 describes a variety of classes of users, and it
7 describes various roles and responsibilities or
8 activities that various users need to do
9 particularly with respect to the owner, but --
10 as well as the other parties, the inspector and
11 jurisdictional authority.

12 And it describes at kind of an
13 overall level information, like inspection
14 information, that a POSA could recognize as
15 being -- could be potentially complex and
16 sophisticated.

17 It doesn't have to be, and it's
18 not specified like that, but that's what a
19 POSA would realize.

20 BY MR. COLSHER:

21 Q. Okay. And you touched on the
22 classes of user, so let's focus on that for a

1 minute.

2 There are three classes of user
3 that are claimed in claim 8 of the '966
4 patent; is that right?

5 A. (Document[s] reviewed.)

6 Yes: an owner of an asset, an
7 approval authority, and an inspector.

8 Q. And those are separate classes
9 of users; right?

10 A. Yes.

11 And, to be precise, the claim
12 says at least three classes of users, with
13 those three specified.

14 Q. Understood.

15 The claim could have more, but
16 has to have three, at a minimum.

17 A. Yeah.

18 Q. Okay. And each of those three
19 classes of users must, themselves, have the
20 ability to perform certain functions within
21 the claim; is that right?

22 MR. PERQUE: Objection to form.

1 THE DEPONENT: By the way, when
2 you get a chance, let's take a break.

3 A. There is descriptions of
4 various activities, I guess is the best word,
5 by classes of user in claim 8, particularly
6 with respect to the owner.

7 BY MR. COLSHER:

8 Q. What are the particular
9 activities that you are describing that must
10 be performed by the owner in claim 8 of the
11 '966 patent?

12 A. Probably a better word is
13 "involving the owner," which includes the
14 owner doing something.

15 Well, unless you want me to
16 read the -- effectively I need to read the
17 entire claim to be specific, but there's
18 various references to, for example, notifying
19 the owner, and wherein the owner of the asset
20 remotely accessing the software, updating and
21 reviewing the status of assets, and so on and
22 so forth.

1 So unless you want me to read
2 all that, that's an example.

3 Q. Those are the examples of the
4 activities that are performed by the owner in
5 claim 8?

6 A. Or "involving an owner," is
7 probably a better word.

8 Q. What do you mean by "involving
9 an owner"?

10 A. Well, if you're sending a
11 notice to an owner, the owner is receiving
12 that.

13 Now, you may subsequently
14 perform some activities, but the actual act
15 of receiving something. I'd say "involving"
16 is a better word than "performing the receipt
17 of a notice." It's just a better word.

18 Q. Okay. I understand. I
19 appreciate the clarification.

20 So when the -- the "involving"
21 is generally at least two things, which is
22 receiving the information that's required

1 within the claim and then performing certain
2 functions that are also required by the owner
3 in the claim. Is that right?

4 MR. PERQUE: Objection to form.

5 A. That's fair, with performing --
6 an example of performing would be reviewing
7 and updating, for example.

8 BY MR. COLSHER:

9 Q. Okay. Perfect.

10 MR. COLSHER: I know you need a
11 break, so let's go off the record.

12 (Recess: 10:48 a.m. to

13 11:00 a.m.)

14 BY MR. COLSHER:

15 Q. Welcome back, Mr. Williams.

16 Before the break, we were
17 talking about claim number 8 of the
18 '966 patent, and we were talking about
19 certain information that the owner receives
20 and certain information that the owner -- or
21 certain activities that the owner does.

22 I want to focus on the first

1 part of that: information that the owner
2 receives.

3 And so if we can look at
4 claim 8, column 15, of the '966 patent,
5 beginning at line number 33. And this is
6 the element 8d that everyone sort of
7 self-identified.

8 And it's "based on the
9 analysis, notifying an owner of an asset of a
10 notification event, wherein the notice
11 includes a standard format description of the
12 type of inspection, and a cost associated
13 with the type of inspection..."

14 And you've offered your opinion
15 as to the requirements of the claimed notice;
16 right?

17 A. I'm sorry. Say that last part
18 again.

19 Q. You've offered your opinion as
20 to the requirement of the claimed notice; is
21 that right?

22 A. Requirements. Characteristics.

1 Yeah.

2 Q. Okay. And you offered your
3 opinion that the notice must be full -- and
4 contain fully -- strike that.

5 Let's take a look at
6 paragraph number 62 of your declaration,
7 Exhibit 2020. And that's on page number 32.

8 And in this paragraph, you're
9 talking about "fully contained content." Do
10 you see that?

11 A. (Document[s] reviewed.)

12 Yes.

13 Q. And what are you referring to
14 when you say that this supports the idea that
15 it must -- the idea of fully contained
16 content in a notice?

17 A. (Document[s] reviewed.)

18 Well, let's see. I think
19 I describe that in the next few paragraphs.

20 But, in general, it means that
21 there's -- what it doesn't mean, in my
22 opinion, is that there is just some sort of

1 instruction to go to this -- check your
2 account for further details or that kind of
3 thing.

4 That you need to have some sort
5 of -- that the notice itself provides enough
6 information for the user to understand what
7 the communication is about and go from there.

8 Q. And the information that the
9 notice itself must contain is the -- is a
10 standard format description of the type of
11 inspection and the cause associated with the
12 type of inspection; is that right?

13 And that's column 15, lines 34
14 through 36.

15 A. (Document[s] reviewed.)

16 Yes.

17 Q. Okay. If you look at
18 Exhibit 2020, paragraph number 60 on page 30.
19 And the last bullet that's on page 30 talks
20 about: For each asset on the inspection list,
21 generating, according to computer-executable
22 instructions, the fire hydrant management

1 software, a standard format notice notifying
2 an owner of an impending deadline, such notice
3 to include a list of qualified inspectors for
4 the asset, a description of the inspection,
5 and the cost with the type of inspection.

6 So the notice has to include --

7 A. I'm sorry. You're on
8 paragraph 60? Is that what you're --

9 Q. Yeah.

10 Sorry. Let me strike that, and
11 we can start that over so we can get that --
12 I'm on paragraph 60, and particularly it's
13 that last bullet on paragraph 60 on
14 page number 30 -- not the last bullet --

15 A. I was looking at the last
16 bullet of the paragraph, which was on
17 paragraph 31, so...

18 I got you.

19 Q. Yeah. I realized, when I asked
20 that question, I didn't state a page; that we
21 were going to be off.

22 So looking at the second bullet

1 of paragraph 60, which is the last bullet on
2 page 30 of Exhibit 2020, you're talking
3 about --

4 MR. PERQUE: Objection to form.

5 Sorry. It's the third bullet.

6 MR. COLSHER: Oh, geez. Let
7 me -- thanks. I appreciate it.

8 BY MR. COLSHER:

9 Q. Let me try one more time.

10 Third bullet, paragraph 60,
11 last bullet on page 30 of Exhibit 2020.

12 A. Got it.

13 Q. We're talking about the notice
14 to include a list of qualified inspectors for
15 the asset and description of the type of
16 inspection and costs associated with the type
17 of inspection.

18 In this third bullet of
19 paragraph 60, are you referring to the claim
20 notice with the information that must be
21 included?

22 A. (Document[s] reviewed.)

1 I'm sorry. Repeat the
2 question.

3 Q. Oh, sure.

4 In the third bullet of
5 paragraph 60 on page number 30, you refer to
6 a notice to include the list of qualified
7 inspectors for the asset, a description of
8 the type of inspection, and a cost associated
9 with the type of inspection.

10 Is this the notice that you're
11 referring to, the claim 8 notice, with the
12 information that must be fully contained
13 within the notice?

14 MR. PERQUE: Objection to form.

15 A. (Document[s] reviewed.)

16 That's an illustration of that,
17 if I understand your question.

18 BY MR. COLSHER:

19 Q. What do you mean by an
20 "illustration" of the requirements of the
21 notice in claim 8?

22 A. (Document[s] reviewed.)

1 Ask your original question
2 again, and then maybe I'd answer it a little
3 better.

4 Q. Sure.

5 The third bullet of
6 paragraph 30 [sic] of your Exhibit 2020, your
7 declaration, on page number 30, you refer to
8 "such notice to include the list of qualified
9 inspectors for the asset, a description of
10 the type of inspection, and a cost associated
11 with the type of inspection."

12 Is your reference in -- to this
13 notice in paragraph 60, third bullet,
14 referring to the claim 8 notice?

15 MR. PERQUE: Objection to form.

16 A. The "fully informed" is what
17 I would characterize a -- what I would say is
18 a good notice. And then these elements, if
19 you will, described here are about --
20 particularly about claim 8.

21 BY MR. COLSHER:

22 Q. What do you mean when you say

1 "a good notice"?

2 A. Well, in my -- in the section
3 of what I described as fully informed,
4 that's -- I guess that's what I mean by "good
5 notice."

6 It's probably not the best
7 choice of terms in a patent context, but...

8 Q. And so the notice needs to
9 be -- I'm looking at paragraph 61, first
10 bullet of your declaration, Exhibit 2020. It
11 needs to be self-contained and complete in
12 content? Is that right?

13 MR. PERQUE: Objection to form.

14 A. In my view, a "good notice"
15 would have -- be fully informed; that you
16 wouldn't have to go elsewhere and -- to
17 understand what the notice is about. You may
18 have to go elsewhere to get some additional
19 details, but at least you wouldn't just
20 say -- it wouldn't be just kind of a "Go to
21 this" -- "Go to your account to find more
22 information about this upcoming activity that

1 you need to perform," and then that's all
2 that is. That's not a fully informed notice,
3 in my opinion.

4 I didn't do a metes-and-bounds
5 analysis of where "fully informed" starts and
6 stops.

7 BY MR. COLSHER:

8 Q. Okay. So you did not offer
9 your opinion as to what "fully contained" --
10 or, excuse me, "fully informed" means in the
11 context of claim 8 of the '966 patent
12 patent's notice? Is that right?

13 A. I did not do a mapping of the
14 individual elements with respect to laying
15 out this would be fully informed and this
16 would not be fully informed. I just didn't
17 do that mapping.

18 Q. Would a fully informed notice
19 to meet claim 8 be required to be -- and I'm
20 looking at column 15, line 34 and 35 -- need
21 to -- strike that.

22 Would a fully informed notice

1 to meet claim 8 of the '966 patent require
2 the inclusion of a standard format
3 description of the type of inspection?

4 A. (Document[s] reviewed.)

5 It could.

6 Q. It is not a requirement that
7 the notice includes a standard format
8 description of the type of inspection to meet
9 claim 8?

10 MR. PERQUE: Objection to form.

11 A. Well, claim 8 has a limitation
12 that -- for sending a standard format notice.
13 So that is a requirement of claim 8.

14 BY MR. COLSHER:

15 Q. So in order to meet claim 8 of
16 the '966 patent, the notice itself must
17 include a standard format description of the
18 type of inspection; right?

19 A. (Document[s] reviewed.)

20 For that particular limitation,
21 yes.

22 Q. Okay. And the same notice must

1 also itself include the costs associated with
2 the type of inspections?

3 A. (Document[s] reviewed.)

4 The notice going to an owner.

5 Q. So the answer to my question is
6 "yes"?

7 A. So notifying -- I'm reading
8 from 15, line 33. "Notifying an owner of an
9 asset of a notification event, wherein the
10 notice includes a standard format description
11 of the type of an inspection and a cost
12 associated with the type of inspection..."

13 Q. Okay.

14 A. And then also about designated
15 interval.

16 Q. And that notice should be fully
17 contained in accordance with your analysis
18 that you offered in paragraph [sic] 2020,
19 needs to include both pieces of that
20 information: the standard format description
21 and the cost itself? Right?

22 A. Like I said, I didn't do kind

1 of a metes-and-bounds mapping of that.

2 I think it's -- a POSA would
3 recognize that there would be some reference
4 to those pieces of information in the notice.

5 But the fully contained
6 reference in my declaration is -- was
7 primarily referring to what a -- in my
8 opinion, a notice would not be, which is some
9 sort of "Go to your account ABC, login and
10 find out about more details about this -- the
11 notice that we've just let you know was in
12 there."

13 That is -- that's not providing
14 what I would view as fully containing
15 information, where that -- again, from there,
16 I didn't define the metes and bounds of what
17 "fully contained" is.

18 But in my view, just having a
19 task on a list that you have to go and login
20 to and find out what that is is not fully
21 contained notice.

22 Q. Okay. All right. I'm just

1 trying to get to the metes and bounds because
2 it's important to the understanding of the
3 analysis that you provided relative to the
4 prior art. And if we're not going to get
5 there, you know, we'll deal with that.

6 A. I can definitively tell you
7 what, in my opinion, it is not, and that is
8 some sort of "notice" that says you have to
9 go log into this other system to find out
10 what this message is about, what task you
11 have to do or what have you.

12 That would not be fully
13 contained, in my view.

14 Q. Okay. Let me try to break that
15 down.

16 So if I have to go and find
17 out, outside of the notice itself, what the
18 description of the type of inspection is,
19 that would not meet your definition of
20 "notice" in the claim 8 of the '966 patent;
21 is that right?

22 A. Again, I didn't do a

1 metes-and-bounds mapping.

2 A communication to an owner
3 that says, you know, there's important
4 information in your account. Go log in and
5 find out what it is, which I think is a skit
6 sometimes -- that would not be a fully
7 informed notice.

8 But I didn't do the full metes
9 and bounds and the transition point of what
10 is and what isn't. Just in my view --

11 Q. So you offered --

12 A. -- that would be an example of
13 what a fully informed notice is not.

14 Q. So the only opinion that you
15 offered are at the extremes, where a notice
16 where you had -- where it does not specify a
17 particular information that's required and
18 I have to say go look for it in some --
19 somewhere else would not meet it, but a
20 notice that has all the information would
21 meet it.

22 Is that right? Is that where

1 your extremes are?

2 MR. PERQUE: Objection to form.

3 A. (Document[s] reviewed.)

4 I didn't phrase it like that in
5 the declaration, but I think that would be a
6 reasonable characterization of the -- you
7 know, the potentially two outer-bound
8 elements.

9 BY MR. COLSHER:

10 Q. Okay. I won't belabor that
11 point anymore.

12 Are you familiar with the NFPA?

13 A. Yes.

14 Q. And what is the NFPA?

15 A. National Fire Prevention
16 Association.

17 Q. Are you familiar with the codes
18 that are authored by the NFPA?

19 A. I am familiar or aware of --
20 that there are various codes and very
21 specific ones. And I was aware of that
22 generally.

1 And then Mr. Moren's
2 declaration provided more information on
3 specific examples, like, for fire alarms
4 versus fire sprinklers, that kind of thing.

5 Q. So outside of Mr. Moren's
6 declaration, you don't have any independent
7 knowledge about the codes of NFPA?

8 A. I was and am aware of the
9 existence of codes for various pieces of
10 life-safety equipment, like the fire alarms
11 and fire extinguishers and all that kind of
12 thing.

13 I am not aware of the kind of
14 specific requirements or rules associated
15 with any -- those individual assets, but I'm
16 aware of the existence of codes and what
17 they're targeted at.

18 Q. Does claim 8 require -- strike
19 that.

20 Does claim 8 claim any particular
21 codes in order to meet limitations of claim 8?

22 A. (Document[s] reviewed.)

1 The word "code" I don't believe
2 is in claim 8, but it is in the specification.
3 And, in fact, the starting sentence around the
4 background of the information is about
5 requiring -- and I'm reading from column 1,
6 line 20 -- "compliance with the code, local
7 rule, state law, or federal law."

8 So codes are -- while not in
9 the claim specifically as a term, in my
10 interpretation of the claim, code compliance
11 is a central part of the invention.

12 Q. Did the '966 patent as claimed
13 in claim 8 invent any new codes?

14 MR. PERQUE: Objection to form.

15 A. I'm sorry. Would you repeat
16 that?

17 I'm sorry repeat that.

18 BY MR. COLSHER:

19 Q. In the '966 patent as claimed
20 in claim 8, did it invent any new codes?

21 MR. PERQUE: Same objection.

22 A. Invent any new codes? Like

1 creation of NFPA new codes AZ1?

2 No, there's nothing like that.

3 BY MR. COLSHER:

4 Q. So the invention in the '966
5 patent relies upon preexisting code; right?

6 MR. PERQUE: Same objection.

7 A. Codes, standards, regulations,
8 laws, yes.

9 BY MR. COLSHER:

10 Q. And all of those codes,
11 standards, regulations, and laws that you
12 referred to predate the invention of the '966
13 patent; right?

14 A. I don't think the intent of the
15 invention was to follow the codes as they
16 existed only at that time or before, to the
17 exclusion of any future modifications.

18 I think the idea was to be able
19 to comply with the codes as they exist at the
20 time of an inspection.

21 Q. Okay. Are you familiar with a
22 handheld device?

1 A. Yes.

2 Q. Does claim 8 require a handheld
3 device?

4 A. (Document[s] reviewed.)

5 There's no reference to
6 "handheld device" in claim 8.

7 Q. Does claim 8 require any
8 particular computer or device to be used by a
9 class of user accessing the system?

10 A. (Document[s] reviewed.)

11 Well, claim 8 starts with a
12 computer-implemented method. And then in the
13 context of the specification, there are
14 descriptions of various devices, including
15 mobile devices.

16 So clearly it -- in my view,
17 the invention, as a whole, anticipated --
18 I guess that's not a good word -- provided as
19 examples various types of computer-
20 implemented methods using various types of
21 devices.

22 But, again, claim 8 doesn't

1 specify any device; it just describes
2 computer-implemented.

3 Q. If we can turn to claim 8
4 again. We're going to look at what we had
5 labeled as 8b in this proceeding. It's
6 column 15, line 27. "Retrieving, by a
7 computer-based fire hydrant management
8 software system, real-time records of
9 assets..."

10 Do you see that?

11 A. Yes.

12 Q. And this is the only time that
13 claim 8 uses "real-time"; right?

14 A. (Document[s] reviewed.)

15 Claim 8, yes -- well, and --
16 no. Never mind.

17 Yes, claim 8.

18 Q. And claim 8 is limited to fire
19 hydrants; right?

20 A. (Document[s] reviewed.)

21 Claim 8 is -- talks about a
22 fire hydrant management software. So it

1 certainly includes fire hydrants.

2 Q. I'll ask my question again: Is
3 claim 8 limited to fire hydrants?

4 A. (Document[s] reviewed.)

5 I have a discussion about that
6 in my declaration, if you want to go there.
7 It's not a simple yes or no answer.

8 Q. Where, in your declaration, are
9 you referring to the discussion about claim 8
10 and the scope relative to fire hydrants?

11 A. There's a claim construction
12 section on -- starting on paragraph 53 of my
13 declaration -- 54 of my declaration -- 53.

14 Q. And this is the discussion
15 concerning what "fire hydrant management"
16 means --

17 A. That's correct.

18 Q. -- is that correct?

19 A. Yes.

20 Q. And that second sentence of --
21 and you said paragraph 54; right?

22 A. It starts at 53, I guess.

1 Q. Okay. All right. I've got it.

2 Okay. So section V.

3 Let's look at paragraph 54. So
4 the second -- in the first sentence, you're
5 talking about the metes and bounds of the
6 term "fire hydrant management software."

7 And in the second sentence, you
8 say, "In my view, fire hydrant management
9 software is, first and foremost, a
10 description of the scope of the type of
11 assets managed by the software." Right?

12 A. Right.

13 Q. Okay. And that's referring to
14 fire hydrants in that sentence; right?

15 A. That's inclusive of fire
16 hydrant.

17 Q. It's specifically referring to
18 fire hydrants; right?

19 A. Well, the term "fire hydrant
20 management" has "fire hydrant" in it. So
21 it's certainly referring to that.

22 Q. And you stated specifically

1 it's definitive of the scope of the type of
2 assets managed by the software; right?

3 MR. PERQUE: Objection to form.

4 A. (Document[s] reviewed.)

5 I state that, yes.

6 And further on, though, I
7 provide more explanation about -- specifically
8 it says "Nonetheless, I do not believe,
9 similar to petitioners via its petition
10 positions, that the patent disclosure is
11 focused solely on the management of fire
12 hydrants. However, it is not any and all type
13 of assets either..."

14 And then I go on to describe
15 that in more detail.

16 BY MR. COLSHER:

17 Q. Okay. And in that sentence
18 that you just read, you're talking about the
19 patent's disclosure, not the claims; right?

20 MR. PERQUE: Objection to form.

21 A. Yes. In the patent disclosure,
22 it just says "fire hydrant management

1 software."

2 But to -- your opening question
3 is about how I interpreted it. I interpreted
4 it with respect to the -- not just the claims
5 but the specification and prosecution history
6 as well.

7 BY MR. COLSHER:

8 Q. Okay. And based on your
9 interpretation of the specification and
10 claims prosecution history, the scope of
11 claim 8 is to fire hydrants specifically;
12 right?

13 A. It includes fire hydrants.
14 It also, in my view, includes fire
15 hydrant-related assets and systems.

16 Q. What is a fire hydrant-related
17 asset and system?

18 A. I describe that. I'm not --
19 I forget exactly where, but it would include
20 things like fire alarms and fire sprinklers.
21 Those kinds of things.

22 Q. Okay. Let's go to column 1 of

1 the '966 patent.

2 A. Um-hmm.

3 Q. And let me know when you're
4 there. And we're going to talk about the
5 Background of the Invention, starting at
6 line 19.

7 A. Okay.

8 Q. All right. And in this
9 paragraph, column 1, line 19 through line 32
10 -- strike that.

11 In this paragraph beginning at
12 line 19 through line number 38 of column 1 of
13 the '966 patent, the '966 patent is
14 describing various different assets; right?

15 A. Right.

16 Q. Okay. And it separately
17 describes a fire sprinkler system; right? At
18 line 23 to 24.

19 A. (Document[s] reviewed.)

20 Yes.

21 Q. Okay. And it separately
22 describes a fire alarm system at line 24.

1 A. Yes.

2 Q. Okay. And then it separately
3 describes a kitchen hood system as a
4 particular asset in line 24; right?

5 A. Yes.

6 Q. Okay. And then it continues to
7 give you, over the next several lines up to
8 line number 34, examples of other distinct
9 type of assets; right?

10 A. Yes.

11 Q. Okay. And then particularly at
12 line 35 -- 34 to 36, it talks about fire
13 hydrants as another type of asset; right?

14 A. (Document[s] reviewed.)

15 That passage talks about fire
16 hydrants.

17 Q. And earlier you talked about
18 the prosecution history relating to the
19 '966 patent. And the claims were narrowed to
20 specify not just any asset management
21 software but particularly fire hydrant
22 management software; right?

1 A. Correct.

2 Q. If you look at -- let's look at
3 the cover page of the '966 patent.

4 A. Okay.

5 Q. And the filing date for this
6 patent is January 23rd, 2008; right?

7 A. Yes.

8 Q. And that is the date that you
9 used as the timing of considering the
10 perspective of one of skill -- ordinary skill
11 in the art at the time of invention; is that
12 right?

13 A. (Document[s] reviewed.)

14 I'm trying to find it in my
15 declaration. But I think it's the actual
16 provisional filing date.

17 Q. Oh, yeah. You know what? Turn
18 to -- I'm sorry -- let me help you out here.
19 Paragraph 42 on page 18 of
20 Exhibit 2020.

21 A. Yeah. So I say at the time of
22 the patent provisional filing in 2007. So

1 that would be October 22nd, 2007.

2 Q. Do you have an understanding of
3 how you would determine whether the
4 inventions claimed in claims 8, 9, 10, 11,
5 12, 13, 14, 15, and 16 of the '966 patent
6 were entitled to claim priority to the
7 provisional applications identified on the
8 face of the '966 patent?

9 A. (Document[s] reviewed.)

10 I don't think I opined on any
11 sort of debate or discussion as to the
12 specific filing -- or specific priority date.
13 I used, as I state in paragraph 42, the 2007
14 date, which would have been October 2007.

15 There's an October 18th and
16 October 22nd. I'm not sure which one, but
17 October 2007.

18 Q. Okay. You didn't rely on
19 the January 23rd, 2007 -- that very first
20 provisional date that -- the '269
21 provisional?

22 MR. PERQUE: Objection to form.

1 A. (Document[s] reviewed.)

2 Oh, yeah. You're right. It's
3 been a while.

4 I mean, I didn't wade into
5 that, you know, but I think it certainly
6 would have been 2007.

7 And I frankly don't remember a
8 discussion about January versus October. So
9 I can't really answer that. I'd say 2007
10 and certainly the October 2007 and possibly
11 the January 2007. I just don't remember,
12 frankly.

13 BY MR. COLSHER:

14 Q. Okay. I think you have at
15 least one of these is front of you.

16 Did you review the Key
17 reference, Exhibit 1005, in connection with
18 the preparation of your declaration submitted
19 in this proceeding?

20 A. I did.

21 Q. Okay. And did you review the
22 Sweeney reference, which was Exhibit 1006, in

1 connection with the preparation of your
2 declaration in this proceeding?

3 A. I did.

4 Q. And did you review the Chauhan
5 reference, Exhibit 1016, in connection with
6 the preparation of your declaration
7 proceeding?

8 A. I did.

9 Q. Okay. And did you review the
10 McKinney reference, which was Exhibit 1020,
11 in preparation of your -- strike that.

12 Did you review the McKinney
13 reference, Exhibit 1020, in this proceeding
14 in preparation for your declaration in this
15 proceeding?

16 A. I did.

17 Q. Okay. And other than Key,
18 Sweeney, Chauhan, and McKinney, did you
19 review any other prior references that you
20 included in your -- in forming your opinion
21 in your declaration in this proceeding?

22 MR. PERQUE: Objection to form.

1 A. Well, I reviewed the declaration.
2 And as they made reference to other exhibits,
3 I did go and re-review some of them.
4 I couldn't give you an inventory of which ones
5 I re-reviewed for this or not.

6 BY MR. COLSHER:

7 Q. Did you include any analysis of
8 any other prior art other than Key, Sweeney,
9 Chauhan, and McKinney in your declaration as
10 you submitted it in this proceeding?

11 A. Not that I can recall, sitting
12 here.

13 Q. Okay. I just didn't see
14 anything else, so I just wanted to make sure
15 I wasn't missing anything.

16 Let's take a look at Key, which
17 is Exhibit 1005. I think you have a hard
18 copy of that.

19 A. Yes.

20 Q. And for reference, it's U.S.
21 Patent Publication No. 2002/0029222.

22 (Previously marked Deposition

1 Exhibit 1005, U.S. Patent Application
2 Publication No. 2002/0029222 A1 (Key),
3 was tendered to the witness.)

4 Q. And I will put that into the
5 Chat. Okay.

6 Generally, Key discloses
7 owners, inspectors, and jurisdictional
8 reviewers; right?

9 A. I mean, those words are used in
10 Key, but some more than others with, frankly,
11 owners being a very, very distant third of
12 those three, in my opinion.

13 Q. Okay. So the answer is "yes";
14 right?

15 MR. PERQUE: Objection to form.

16 A. All three of those words are
17 included in Key.

18 BY MR. COLSHER:

19 Q. Okay. And each of the
20 inspectors, jurisdictional reviewers, and
21 owners are provided access to the
22 jurisdictional management -- online

1 management system in Key; right?

2 A. (Document[s] reviewed.)

3 In my view -- and I've got,
4 I think, a pretty detailed analysis of
5 that -- in my opinion, the owner is not one
6 of the users as described in Key.

7 Q. Okay. That's not my question.

8 MR. COLSHER: I'll move to
9 strike.

10 BY MR. COLSHER:

11 Q. Let me look at paragraph number
12 7 -- excuse me, sorry -- paragraph 0070,
13 which appears on page 27 of the Bates number
14 pages of the -- exhibit number pages in
15 Exhibit 1005. And it begins "Figure 4
16 illustrates the principal software units..."

17 A. Yes.

18 Q. Okay. Maybe halfway down --
19 it's hard because we don't have line
20 numberings, but it says the web interface
21 411 [sic] provides access for the insurance
22 company inspectors 135, jurisdictional

1 reviewers 125, and owners of the objects via
2 a web browser.

3 Do you see that?

4 A. I see that statement. I do see
5 that sentence.

6 Q. And in this sentence in
7 paragraph 70 of Key, Exhibit 1005, Key is
8 affirming that inspectors, jurisdictional
9 reviewers, and owner users are provided
10 access to it via a web browser; correct?

11 A. (Document[s] reviewed.)

12 Yes, that's what that sentence
13 says.

14 Q. Okay. And in paragraph 71, the
15 first sentence reads "The notification system
16 414 is operative to send communication to
17 users of the JOM. The notification can be
18 accomplished by e-mail delivered via the
19 internet 199." And there's other means, such
20 as telephone calls, facsimiles, et cetera.

21 So here, Key is describing
22 various notifications that may be provided to

1 users of a system; right?

2 MR. PERQUE: Objection to form.

3 A. Generally, yes.

4 BY MR. COLSHER:

5 Q. And let's look at paragraph 55
6 of Key, Exhibit 1005. And the first --

7 A. Okay.

8 Q. In the first sentence, it's
9 talking -- "In step 250, the owner makes the
10 requisite fee payment."

11 A. Right.

12 Q. And this is the same owner that
13 we've been talking about; correct?

14 A. Generally, yes.

15 Q. And it's performing an action
16 within the JOM system; right?

17 MR. PERQUE: Objection to form.

18 A. It's describing making a
19 requisite fee payment.

20 BY MR. COLSHER:

21 Q. By the owner; right?

22 A. Correct.

1 Q. And "Step 255 is followed by
2 step 260, wherein the owner decides whether
3 the object will be decommissioned."

4 Do you see that?

5 A. Yes.

6 Q. And so Key, in step 260, is
7 describing that the owner user is the one
8 that makes the decision regarding
9 decommissioning the object; is that right?

10 A. I think that's a fair
11 statement.

12 Q. Let's look at paragraph 77 of
13 Key. On the very last sentence, it talks
14 about "Upon rejection of the review, the
15 owner is automatically notified and another
16 inspection scheduled."

17 And this paragraph 77 is
18 referring to the same owner that we've been
19 describing; is that right?

20 A. Generally, yes.

21 Q. You can put that away for a
22 second.

1 Let's take a look at
2 paragraph number 97 of your declaration,
3 Exhibit 2020, which is on page number 56.

4 A. Okay.

5 Q. And in this paragraph, you're
6 discussing something that you referred to as
7 proactive notifications and proactive
8 compliance; is that right?

9 A. (Document[s] reviewed.)

10 You're on paragraph 97 of my
11 declaration?

12 Q. Yes. It's pages 56 and 57.

13 A. And what was the word you used?

14 Q. "Proactive notifications" and
15 "proactive compliance."

16 A. I didn't hear that last word.
17 You cut out.

18 Q. "Proactive notifications" and
19 "proactive compliance."

20 A. Oh. I see. I'm looking for
21 that.

22 (Document[s] reviewed.)

1 I see the "proactive
2 notifications." I'm looking for the
3 "proactive compliance."

4 Q. I'll save you the trouble.
5 I don't think you use that particular word in
6 the body. It is in footnote 28, talking
7 about Exhibit 2042, Benefits of Proactive
8 Compliance Program.

9 A. Oh. I see. Yeah.

10 Q. I want to take a look at
11 Exhibit 2042, which I just put into the Chat.

12 If you pull that you up. Let
13 me know when you can access it.

14 (Previously marked Deposition
15 Exhibit 2042, Consumer Compliance
16 Outlook, Third Issue 2020, The
17 Benefits of a Proactive Compliance
18 Program by Kathleen Benson, was
19 tendered to the witness.)

20 (Pause.)

21 A. Okay.

22 Q. And you are relying on

1 Exhibit 2042 in support of your opinion about
2 the need for collaboration of the relevant
3 stakeholders within a system to improve
4 compliance rate; is that right?

5 A. That's part of my citations.

6 Yes.

7 Q. And this document is from 2020;
8 right?

9 A. (Document[s] reviewed.)

10 Yes.

11 Q. And this document is talking
12 about the banking industry; is that right?

13 A. (Document[s] reviewed.)

14 I'd say it's fair that it's
15 focused on the banking industry.

16 Q. And it's not discussing a
17 particular asset that's being managed; right?

18 A. I think it's broader than that.
19 It probably uses examples. I'd have to go
20 back and read it, but I think it's a broader
21 discussion.

22 Q. And it's not talking about the

1 life-safety systems; right?

2 A. It doesn't use the words "life
3 safety."

4 Q. And it's not focused on life
5 safety; right?

6 A. In my view, I think it is
7 applicable -- a lot of it is applicable to
8 life safety, but it is written from -- by a
9 banker predominantly about the banking
10 industry.

11 Q. And generally in your
12 declaration, you performed some internet
13 searching in -- sometime in 2024 to form your
14 opinions concerning the understanding and
15 interpretation of one of ordinary skill in
16 the art relative to the '966 patent; is that
17 right?

18 A. Did I do internet searching in
19 2024 about this -- about the subject matter
20 of this patent? Yes.

21 Q. And in your internet searching
22 and findings, did you make any attempt to

1 ascertain whether the materials that you
2 found in 2024 were available or predated the
3 invention date of 2007 that you relied upon
4 in forming your opinions in your declaration
5 in this proceeding?

6 A. Generally, yes, I do that and
7 generally use documents that are at or before
8 the respective priority date involved.

9 On this one, I viewed it as
10 both the topic that it was discussing, in
11 terms of benefits of proactive compliance, as
12 being relevant to the topic both now and
13 then, as well as not just the banking but for
14 other contexts. And that's the reason
15 I include it.

16 But generally yes.

17 Q. You relied on many documents in
18 this proceeding that postdate the invention
19 of the '966 patent; right?

20 MR. PERQUE: Objection to form.

21 A. I'm not sure about the word
22 "many," but certainly some or one.

1 BY MR. COLSHER:

2 Q. Okay. Well, take a look at
3 Exhibit 2035.

4 A. Which one is that?

5 Q. It's coming into the Chat.

6 A. Okay.

7 (Previously marked Deposition
8 Exhibit 2035, Blog entitled
9 Quantifying the High Cost of Delayed
10 Emergency Response at the Workplace
11 dated June 14, 2019, was tendered to
12 the witness.)

13 Q. Are you familiar with the
14 document that is Exhibit 2035 in this
15 proceeding?

16 A. Yes.

17 Q. Okay. And what is the date of
18 this document?

19 A. June 14, 2019.

20 Q. And you relied upon this
21 document in forming your opinions in this
22 proceeding; right?

1 A. That was part of it, yes.

2 Q. Okay. To the Chat,

3 Exhibit 2033.

4 (Previously marked Deposition

5 Exhibit 2033, 2018 Project Standards,

6 was tendered to the witness.)

7 Q. Let me know when you have that,

8 Mr. Williams.

9 (Pause.)

10 A. Okay.

11 Q. When is this document from?

12 A. It's 2018.

13 Q. And you relied upon 2033 in
14 forming your opinions for your declaration in
15 this proceeding; right?

16 A. That was part of my analysis.

17 Like some of the others,
18 I viewed it as not being -- as being
19 applicable to the time of the priority date
20 of the invention. And in this case, it's
21 talking about a building layout, so...

22 Q. But in your declaration, you

1 didn't provide any written opinions as to the
2 applicability of these post-dated exhibits
3 generally relevant to the time period of the
4 invention of the '966 patent; right?

5 MR. PERQUE: Objection to form.

6 A. I certainly viewed them as
7 applicable, but I did not state anything
8 about that viewpoint in the declaration, I
9 don't believe.

10 BY MR. COLSHER:

11 Q. Okay. And in forming your
12 opinions, you reviewed the prosecution
13 history of the '966 patent; right?

14 A. Yes.

15 Q. Okay. In forming your
16 opinions, did you review the prior art that
17 was cited or included as part of the
18 prosecution history of the application
19 leading to the '966 patent?

20 MR. PERQUE: Objection to form.

21 A. I do not remember.

22 ///

1 BY MR. COLSHER:

2 Q. And you didn't provide any
3 analysis of those prior art references in
4 your declaration that you submitted in this
5 proceeding; right?

6 MR. PERQUE: Same objection.

7 A. I think that's probably fair.

8 BY MR. COLSHER:

9 Q. Okay. Did you review the
10 examiner's reasons for allowance of claims 8
11 through 16 of the '966 patent when forming
12 your opinions in this declaration?

13 A. I reviewed them.

14 And while I don't remember
15 everything that I specifically incorporated
16 from that into this, certainly one of the
17 things the examiner did in terms of the final
18 approved claims was the addition of fire
19 hydrant management software.

20 Q. Did you review any of the prior
21 art that the examiner discussed and its
22 reasons for allowance of claims 8 through 16

1 of the '966 patent in forming your opinions
2 in this declaration?

3 MR. PERQUE: Objection to form.

4 A. I mean, I reviewed the
5 prosecution history which made reference,
6 I believe, to various pieces of prior art.

7 Did I then subsequently go and
8 additionally examine each one of those pieces
9 of prior art? I do not remember. I don't
10 think so, in general.

11 BY MR. COLSHER:

12 Q. In forming your opinions in
13 this proceeding to submit your declaration,
14 Exhibit 2020, did you review patent owner's
15 infringement theory in district court?

16 A. No. I didn't review any of the
17 infringement stuff.

18 Q. In forming your opinions in the
19 declaration that you submitted, Exhibit 2020
20 in this proceeding, did you review patent
21 owner's assertion that it practices the
22 challenged claims of the '966 patent?

1 A. I think I remember that. I do
2 not remember where.

3 Q. Did you, for this proceeding,
4 attempt to interpret the claims of the '966
5 patent when assessing validity consistently
6 with how patent owner has read its claims to
7 assert that it is practicing the challenged
8 claims of the '966 patent?

9 A. My best answer is I reviewed
10 and interpreted the claims in the context of
11 the claim specification and prosecution
12 history.

13 Q. And that would be consistent
14 with how one of ordinary skill in the art
15 would interpret the claims as of the time of
16 invention of the '966 patent; is that right?

17 A. Correct.

18 Q. Let's take a look just real
19 quick at paragraph number 217 of your
20 declaration, Exhibit 2020. That's on
21 page 139.

22 A. Okay.

1 Q. The third sentence states "In
2 particular, the references do not teach the
3 owner-enabling, collaboration (and
4 compliance) enhancing capabilities enabled by
5 the system/(method?) claimed..."

6 What is the question mark
7 referring to in paragraph 217 of the
8 declaration?

9 A. That's a typo.

10 Q. Does the '966 patent have any
11 system claims?

12 A. (Document[s] reviewed.)

13 There is a method claim.

14 Claim 22 and -- to 31 are
15 system claims, obviously not included and
16 part of this declaration.

17 So I think that was just a
18 mistake on my part, in terms of not deleting
19 and just saying "method."

20 Q. Sorry. Claims 22 to 31 of the
21 '966 patent?

22 A. Oh. Sorry. I'm looking at

1 Key.

2 Q. Okay.

3 A. Oops. Sorry.

4 Q. I didn't mean this as a trick
5 question. I'm just trying to clear up --

6 A. No. You're -- no. You're
7 right.

8 '966 is all method. So I think
9 that was old verbiage that I neglected to
10 delete.

11 Q. Okay. In paragraph number 6 of
12 your declaration in Exhibit 2020, in
13 paragraph 6, you reference several exhibits.

14 A. Yes.

15 Q. Of these exhibits, you only
16 provided an opinion in your declaration
17 concerning Exhibit 1005, Key; 1006, Sweeney;
18 1016, Chauhan; and 1020, McKinney. Right?

19 A. I'd have to go back and search
20 each one of those, but I think that's
21 correct. But to be certain, I'd need to go
22 back and do a search on each one of those.

1 Q. I'll represent, for the
2 interest of time, that outside of this
3 paragraph, I do not find mention of any other
4 exhibits that are referenced in paragraph
5 number 6.

6 A. Okay.

7 Q. And so you did not consider
8 these other exhibits -- apart from Key,
9 Sweeney, Chauhan, or McKinney -- relevant to
10 the opinions that you provided in your
11 declaration; is that right?

12 MR. PERQUE: Objection to form.

13 A. No.

14 As I state here, I reviewed it
15 and am familiar with it. I just have given
16 you a representation. I didn't necessarily
17 include as citations to those other ones, but
18 that doesn't mean I didn't consider them.

19 BY MR. COLSHER:

20 Q. But you didn't provide in your
21 declaration an opinion as to those other
22 exhibits; right?

1 A. Given what you just represented,
2 no.

3 MR. COLSHER: All right. Let's
4 go off the record for a minute.

5 (Recess: 12:07 a.m. to
6 12:13 a.m.)

7 MR. COLSHER: Thank you,
8 Mr. Williams. I have no further
9 questions.

10 THE DEPONENT: Thank you.

11 MR. PERQUE: No questions.

12 MR. COLSHER: Okay.

13 THE STENOGRAPHER: Counsel,
14 please place on the record your
15 transcript orders.

16 Thank you.

17 MR. COLSHER: Yeah. I mean,
18 I don't care about -- given the
19 three-day, I don't care about the
20 rough. But I'll take it.

21 MR. PERQUE: I mean, we've
22 asked for a rough draft.

1 I mean, if you're giving them a
2 3-day expedited -- I mean, we don't
3 want to -- I don't want to order an
4 expedited transcript, because I
5 haven't been authorized to do that.

6 So just the rough draft.

7 THE STENOGRAPHER: Thank you.

8 (Time noted: 12:15 p.m.)

9 - - -

10

11

12

13

14

15

16

17

18

19

20

21

22

1 CERTIFICATE

2 I, LISA A. KNIGHT, Registered
3 Diplomat Reporter and Certified Realtime
4 Reporter, do hereby certify that prior to the
5 commencement of the examination, DAVID H.
6 WILLIAMS was duly sworn by me to testify to
7 the truth, the whole truth, and nothing but
8 the truth.

9 I DO FURTHER CERTIFY that the
10 foregoing is a verbatim transcript of the
11 testimony as taken stenographically by and
12 before me at the time, place, and on the date
13 hereinbefore set forth, to the best of my
14 ability, and that reading and signing was not
15 requested.

16 I DO FURTHER CERTIFY that I am
17 neither a relative nor employee nor attorney
18 nor counsel of any of the parties to this
19 action, and that I am neither a relative nor
20 employee of such attorney or counsel, and
21 that I am not financially interested in the
22 action.



23
24
25
26
27 LISA A. KNIGHT
28 NCRA Registered Diplomat Reporter
29 NCRA Certified Realtime Reporter
30 NCRA Realtime Systems Administrator

31
32 Dated: June 25, 2024

1 David H. Williams, c/o
2 FISHERBROYLES, LLP
3 2925 Richmond Avenue, Suite 1200
4 Houston, Texas 77098
5

6 Case: Brycer, LLC et al. v. Tegriss, Inc.
7 Date of deposition: June 21, 2024
8 Deponent: David H. Williams
9

10 Please be advised that the transcript in the above
11 referenced matter is now complete and ready for signature.
12 The deponent may come to this office to sign the transcript,
a copy may be purchased for the witness to review and sign,
13 or the deponent and/or counsel may waive the option of
signing. Please advise us of the option selected.
14 Please forward the errata sheet and the original signed
signature page to counsel noticing the deposition, noting the
15 applicable time period allowed for such by the governing
Rules of Procedure. If you have any questions, please do
16 not hesitate to call our office at (202)-232-0646.
17

18 Sincerely,
19 Digital Evidence Group
20 Copyright 2024 Digital Evidence Group
21 Copying is forbidden, including electronically, absent
22 express written consent.

1 Digital Evidence Group, L.L.C.
2 1730 M Street, NW, Suite 812
3 Washington, D.C. 20036
4 (202) 232-0646
5

6 SIGNATURE PAGE
7 Case: Brycer, LLC et al. v. Tegriss, Inc.
8 Witness Name: David H. Williams
9 Deposition Date: June 21, 2024

10 I do hereby acknowledge that I have read
11 and examined the foregoing pages
12 of the transcript of my deposition and that:

13 (Check appropriate box):
14 () The same is a true, correct and
15 complete transcription of the answers given by
16 me to the questions therein recorded.
17 () Except for the changes noted in the
18 attached Errata Sheet, the same is a true,
19 correct and complete transcription of the
20 answers given by me to the questions therein
21 recorded.

22 _____
DATE WITNESS SIGNATURE

DATE NOTARY

1 Digital Evidence Group, LLC
2 1730 M Street, NW, Suite 812
3 Washington, D.C. 20036
4 (202)232-0646
5

6 ERRATA SHEET

7
8 Case: Brycer, LLC et al. v. Tegriss, Inc.
9 Witness Name: David H. Williams
10 Deposition Date: June 21, 2024

11 Page No. Line No. Change
12
13
14
15
16
17
18
19
20

21 _____
22 Signature Date

A a.m 1:15 2:4 6:2 33:12,13 66:12 66:13 117:5,6 A1 5:11 98:2 ABC 78:9 ability 24:2 30:17 63:20 119:7 able 27:1 32:16 84:18 absent 120:21 Absolutely 8:6 access 24:9 32:16 60:20 98:21 99:21 100:10 104:13 accessible 53:14 accessing 54:2 64:20 85:9 accomplished 100:18 account 69:2 74:21 78:9 80:4 accurate 7:20 39:7,16 55:4 acknowledge 121:9 act 65:14 action 101:15 119:10,13 activities 62:8 64:4,9 65:4,14 66:21 activity 74:22 actual 18:5 42:13 58:19 65:14 93:15 addition 111:18 additional 74:18 additionally 112:8 adjective/adverb 44:8 Administrator 2:7 119:20 advise 120:13 advised 120:10	affirming 100:8 ago 11:3 agree 38:11 46:1 46:19 48:6 al 5:4,8 32:15 40:13 120:6 121:7 122:8 alarm 91:22 alarms 23:17 24:22 26:15 82:3,10 90:20 alert-based 36:16 allowance 111:10 111:22 allowed 120:15 allowing 43:5 allows 41:22 48:16 analysis 23:7 51:11,15,15 67:9 75:5 77:17 79:3 97:7 99:4 109:16 111:3 and/or 23:10 24:22 45:15 56:13,13 120:13 Andrew 11:12 answer 21:21 26:21 27:2 39:14 44:21 45:2 46:17 55:19 60:6 73:2 77:5 87:7 95:9 98:13 113:9 answered 46:22 answering 21:3 26:5 answers 121:12 121:15 anticipated 85:17 anybody 8:21 40:21 anymore 10:8 81:11 anyways 52:16 apart 116:8	Apparatus 34:21 apparently 30:1 APPEAL 1:2 appearing 3:2 appears 99:13 applicability 110:2 applicable 106:7 106:7 109:19 110:7 120:15 application 5:9 38:6 98:1 110:18 applications 94:7 appreciate 65:19 71:7 appropriate 121:11 approval 63:7 approved 111:18 approximately 12:20 18:14 April 12:19 area 23:13 area/geofences 36:19 art 25:6 36:5 37:9 38:8,10,13 51:12 79:4 93:11 97:8 106:16 110:16 111:3,21 112:6 112:9 113:14 ascertain 107:1 asked 57:11 59:15 70:19 117:22 asking 51:20,21 aspirational 43:18 assert 113:7 assertion 112:21 assessing 113:5 asset 20:7 30:22 31:4 36:13 53:11,11,15,22 54:1 63:6 64:19	67:9 69:20 70:4 71:15 72:7 73:9 77:9 90:17 92:4 92:13,20 105:17 asset-manage... 30:10,13 35:20 36:9,15 asset-related 36:19 assets 20:13,14 20:17 21:18 52:22 53:2,5 54:4 60:18 64:21 82:15 86:9 88:11 89:2 89:13 90:15 91:14 92:9 associated 20:22 21:17 22:3 23:8 30:14,22 53:15 58:16 67:12 69:11 71:16 72:8 73:10 77:1 77:12 82:14 association 53:10 81:16 AT&T 34:7 35:17,19 36:2,4 36:10,15 37:5 attached 121:14 attempt 106:22 113:4 attorney 119:9 119:11 attributes 43:4 58:16 60:14 Austin 31:17 authored 12:11 14:20 19:18 81:18 authority 62:11 63:7 authorized 118:5 automatically 102:15 availability 11:9	available 107:2 Avenue 3:15 120:3 aware 14:19 81:19,21 82:8 82:13,16 awkward 43:2 AZ1 84:1 B b 52:14 56:18 B2 5:3,7 32:14 40:13 Bachelor 31:13 back 8:1 11:4 24:20 38:17,22 45:1 46:8 66:15 105:20 115:19 115:22 background 15:16 34:16 35:15 44:14 45:5 47:6 48:22 49:3 83:4 91:5 banker 106:9 banking 105:12 105:15 106:9 107:13 based 39:12 53:15 67:8 90:8 basically 45:3 Bates 99:13 beginning 54:14 67:5 91:11 begins 99:15 behalf 2:3 6:18 belabor 81:10 believe 28:7 39:5 52:8 83:1 89:8 110:9 112:6 benefits 5:21 104:7,17 107:11 Benson 5:22 104:18 best 64:4 74:6 113:9 119:7
---	---	---	--	---

better 61:14 64:12 65:7,16 65:17 73:3 beyond 9:10 34:1 38:14 39:8 bill 18:11 billed 18:15 blast 34:3 Blog 5:16 108:8 BOARD 1:2 body 104:6 bottom 24:15 bounds 23:8 78:16 79:1 80:9 88:5 box 61:21 121:11 breadth 37:4 break 7:21,22 8:4 8:8 33:10 64:2 66:11,16 79:14 broader 105:18 105:20 broke 29:18 browser 100:2,10 Brycer 1:4,4 6:20 120:6 121:7 122:8 building 22:9 24:3,22 26:19 28:6 30:9 31:4 109:21 bullet 69:19 70:13,14,16,22 71:1,5,10,11,18 72:4 73:5,13 74:10 business 26:7	calls 11:21 12:1 100:20 cap 56:16 capabilities 20:8 20:13 36:13 114:4 capability 30:13 capacity 28:22 care 117:18,19 careful 47:8 case 22:17 40:21 46:10 109:20 120:6 121:7 122:8 cause 69:11 CDT 1:15 2:4 6:2 central 83:11 centralized 36:16 certain 19:16 36:18 47:1 63:20 66:1,19 66:20,21 115:21 certainly 21:13 22:1 25:20 42:11 51:10 87:1 88:21 95:5 95:10 107:22 110:6 111:16 CERTIFICATE 119:1 Certified 2:6 119:2,19 certify 119:2,5,8 cetera 22:5 100:20 challenged 42:20 112:22 113:7 chance 64:2 change 29:3 122:11 changes 29:7 121:13 Characteristics 67:22 characterization 81:6	characterize 31:16 61:12 73:17 charge 18:10 Chat 32:9 40:20 41:7 98:5 104:11 108:5 109:2 Chauhan 96:4,18 97:9 115:18 116:9 check 69:1 121:11 choice 74:7 choose 25:3 Chris 3:14 33:5 chris.perque@... 3:15 citation 14:17 citations 105:5 116:17 cited 14:16 110:17 citizen 45:13 City 27:9 28:2 claim 49:2,6,13 50:3,12,15,18 51:1,2,6,11,20 52:4,17 53:5,6 53:9 55:6,15 56:3 57:3,5,10 57:12,12,13 58:6,6,7 59:2,5 59:11,13 60:1,3 60:9,12 61:6 62:1,3,5 63:3 63:11,15,21 64:5,10,17 65:5 66:1,3,17 67:4 71:19 72:11,21 75:19 76:1,9,11 76:13,15 79:20 82:18,20,20,21 83:2,9,10,13,20 85:2,6,7,11,22 86:3,13,15,17	86:18,21 87:3,9 87:11 90:11 94:6 113:11 114:13,14 claimed 42:18,19 52:4,19 62:2 63:3 67:15,20 83:12,19 94:4 114:5 claims 42:13,20 47:7 50:19 51:6 51:16 61:17 89:19 90:4,10 92:19 94:4 111:10,18,22 112:22 113:4,6 113:8,10,15 114:11,15,20 clarification 65:19 clarify 54:9 class 46:11 48:4 85:9 classes 48:5 62:6 62:22 63:2,8,12 63:19 64:5 clear 47:20 51:20 115:5 clearly 50:1 85:16 clock 8:7 code 83:1,6,10 84:5 codes 81:17,20 82:7,9,16,21 83:8,13,20,22 84:1,7,10,15,19 collaboration 19:5 105:2 114:3 collection 27:20 38:9,12 58:2,4 collectively 45:19 college 31:8 Colsher 3:6 4:6 6:7,9 9:3 13:7 20:1,11 33:2,11	33:14 34:10 39:3,10,13 40:1 40:7,18 41:8 42:14 43:9,20 56:2 57:2 58:1 59:1,10 60:8 62:20 64:7 66:8 66:10,14 71:6,8 72:18 73:21 75:7 76:14 81:9 83:18 84:3,9 89:16 90:7 95:13 97:6 98:18 99:8,10 101:4,20 108:1 110:10 111:1,8 112:11 116:19 117:3,7,12,17 column 37:13,19 37:20,21 38:3 39:6 41:19 42:6 42:16 44:1,3,17 45:8,10 46:2 47:12,17,19 48:9 49:9 52:9 54:14 67:4 69:13 75:20 83:5 86:6 90:22 91:9,12 columns 41:13 55:2 combatting 27:17 come 8:1 49:4 120:12 coming 54:7 108:5 commencement 119:3 communicate 47:14 communication 69:7 80:2 100:16 company 20:18 99:22 compensated
C C 3:1 c/o 120:1 California 3:10 call 16:22 26:4 28:14 56:11 120:16 called 56:17 calling 52:11				

18:4,8	considering 93:9	100:10 101:13	54:12 55:8,17	82:6 87:6,8,13
complete 74:11	consistent 113:13	101:22 113:17	56:1,4,18,19	87:13 93:15
120:11 121:12	consistently	115:21 121:12	57:4,18 58:6,7	95:18 96:2,6,14
121:14	113:5	121:14	58:11,16,21	96:21 97:1,9
complex 58:13	constructing	correspond	59:2,7,14 60:3	103:2,11
60:19 61:5,6,10	21:22	42:17	60:12 61:7,10	106:12 107:4
61:14,18 62:15	construction	cost 5:17 67:12	61:18,22 62:2	109:14,22
complexity 58:15	87:11	70:5 72:8 73:10	databases 38:11	110:8 111:4,12
60:13	constructs 38:21	77:11,21 108:9	38:20 39:18	112:2,13,19
compliance 5:20	consultant 34:7	costs 71:16 77:1	40:2	113:20 114:8
5:21 54:3 83:6	Consulting 20:19	counsel 3:4,13	date 18:15 93:5,8	114:16 115:12
83:10 103:8,15	Consumer 5:20	8:8,17,20 14:10	93:16 94:12,14	115:16 116:11
103:19 104:3,8	104:15	19:6,13 20:3	94:20 107:3,8	116:21
104:15,17	contain 68:4 69:9	33:1 39:11	108:17 109:19	declarations 9:9
105:4 107:11	contained 9:14	117:13 119:9	119:6 120:7	9:12 17:14,17
114:4	68:9,15 72:12	119:11 120:13	121:8,17,22	decommissioned
comply 84:19	75:9 77:17 78:5	120:14	122:10,22	102:3
comprise 38:7	78:17,21 79:13	course 33:2,11	dated 5:19	decommissioni...
computer 31:14	containing 78:14	court 112:15	108:11 119:22	102:9
38:7 85:8	content 68:9,16	cover 93:3	dates 11:4	define 78:16
computer- 50:4	74:12	COVID 10:20	David 1:12 2:2	defines 45:19
50:15 85:19	context 7:14	11:1	4:2,5 5:12 6:3	defining 49:1
computer-based	23:12 35:14	create 42:2 43:7	6:14 15:3 119:3	definitely 30:21
86:7	36:1 38:22	48:18	120:1,8 121:8	53:17 56:7
computer-exec...	39:17 47:3 50:9	creating 48:12	122:9	definition 79:19
69:21	53:18 57:13	creation 84:1	day 7:11 13:8	definitive 89:1
computer-impl...	74:7 75:11	crimes 22:4	16:3	definitively 45:21
49:15 85:12	85:13 113:10	CRR 1:18	deadline 70:2	46:6,17 79:6
86:2	contexts 107:14	current 29:15	deal 79:5	degree 31:21
concept 40:5	contextual 49:3	30:20	debate 94:11	59:9 60:15
concern 29:17	continued 47:12	cut 103:17	December 35:1	degrees 31:9,12
concerning 87:15	continues 92:6		decides 102:2	31:18
106:14 115:17	contribute 58:19	D	decision 102:8	Delayed 5:17
conditions 36:19	control 36:17,17	D 4:1	declarant 16:13	108:9
conducted 1:13	conversation	D.C 1:21 121:3	declaration 5:12	delete 115:10
2:2	17:1	122:3	6:17 9:7,15,20	deleting 114:18
confused 11:1	copy 40:15 97:18	data 32:8 34:19	10:19 12:13,16	delivered 100:18
conjunction 24:7	120:12	35:18 38:10,12	12:18,21,22	department 21:5
connection 6:17	Copying 120:21	52:18 53:5	13:9 14:20 15:3	24:2 30:1
12:12 14:21	Copyright	56:14,20 58:5	15:7,18,19 16:4	deponent 33:4,8
17:5,18 28:9	120:20	58:12,14,18	16:7,14 17:4,6	64:1 117:10
30:8 36:6 95:17	correct 7:1,2	59:3,12 60:2,21	17:10,19 19:1,3	120:8,12,13
96:1,5	10:16 35:12	60:22 61:12	23:16 24:13	deposed 7:7
consent 120:22	39:19 43:13	database 32:3,6	34:12 35:15	deposition 1:12
consider 36:3	45:8 46:21	38:8 40:5 52:3	36:11 41:2 52:1	2:2 5:1,5 6:16
37:6 116:7,18	52:15 60:11	52:8,19 53:1,3	68:6 73:7 74:10	7:12 8:14,22
considered 45:18	87:17,18 93:1	53:6,10,15 54:8	78:6 81:5 82:2	9:6,22 10:3,10

15:2 16:15 18:1 32:11,13 40:11 97:22 104:14 108:7 109:4 120:7,14 121:8 121:10 122:10 depth 37:4 describe 60:5,10 60:13 68:19 89:14 90:18 described 42:6 48:7 55:3,8,16 57:6,17 73:19 74:3 99:6 describes 52:21 56:17,19 62:6,7 62:12 86:1 91:17,22 92:3 describing 43:4 43:18 55:12 64:9 91:14 100:21 101:18 102:7,19 description 5:2,6 42:15 57:13 67:11 69:10 70:4 71:15 72:7 73:9 76:3,8,17 77:10,20 79:18 88:10 descriptions 53:21 64:3 85:14 design 31:3,15 designated 77:14 designing 25:14 25:16,19 detail 9:13 89:15 detailed 99:4 details 25:11 49:4 58:10 69:2 74:19 78:10 determine 23:4 94:3 determines 23:1 determining 51:22	development 31:3 device 84:22 85:3 85:6,8 86:1 devices 85:14,15 85:21 devil's 58:10 different 59:15 91:14 Digital 1:20 120:19,20 121:1 122:1 Diplomate 2:6 119:2,18 discloses 98:6 disclosure 89:10 89:19,21 discuss 8:20 discussed 11:19 111:21 discussing 24:15 34:15 35:16 41:3,5 53:18 103:6 105:16 107:10 discussion 87:5,9 87:14 94:11 95:8 105:21 discussions 14:2 14:6,9,14 16:18 dispatch 36:16 dispatchers 21:3 dispute 27:9 28:2 28:9 distant 98:11 distinct 92:8 district 29:22 112:15 document 4:22 32:20 37:22 105:7,11 108:14,18,21 109:11 Document[s] 19:9 35:13 46:4 49:21 52:5,20 53:7 55:9 63:5	68:11,17 69:15 71:22 72:15,22 76:4,19 77:3 81:3 82:22 85:4 85:10 86:14,20 87:4 89:4 91:19 92:14 93:13 94:9 95:1 99:2 100:11 103:9 103:22 105:9 105:13 114:12 documents 8:16 8:17 9:4 11:5 107:7,17 doing 33:9 64:14 download 33:1 downstream 26:4 draft 19:7,18 117:22 118:6 drafts 20:2 drainage 27:20 drawing 54:7 61:21 Dropbox-type 20:5 duly 6:4 119:3 E e 3:1,1 4:1 54:22 e-mail 100:18 e.g 43:5 E911 20:19 26:2 26:7 E911-LBS 20:19 earlier 12:4 92:17 early 27:6 ecosystems 21:1 21:2 education 31:20 effectively 64:16 effort 27:17 either 8:7 14:12 16:1 23:10 46:6 60:14 89:13 Electrical 31:14 electronic 38:9	38:12 58:4 electronically 40:21 120:21 element 52:14 67:6 elements 49:2 50:12 56:12,21 57:10,19 58:12 58:14 60:21,22 73:18 75:14 81:8 elevation 29:12 emergency 5:17 22:2 108:10 employee 119:9 119:11 EMT-type 22:3 enabled 114:4 engineer 27:8 engineering 30:1 31:14 Enhanced 20:20 enhancing 114:4 entail 31:3 entailed 29:2 entire 64:17 entitled 5:16 94:6 108:8 equal 58:12 equipment 25:10 82:10 errata 120:14 121:14 122:6 ES 21:10 ESQUIRE 3:6,14 essentially 27:17 29:9 et 5:4,8 22:5 32:14 40:13 100:20 120:6 121:7 122:8 evaluate 29:6 evaluating 28:10 event 67:10 77:9 events 36:20 eventually 18:13 Evidence 1:20	120:19,20 121:1 122:1 exact 4:21 21:12 exactly 13:21 27:7 90:19 examination 4:5 6:6 119:3 examine 112:8 examined 121:10 examiner 111:17 111:21 examiner's 111:10 example 28:19 36:14 53:22 56:10 64:18 65:2 66:6,7 80:12 examples 22:1 65:3 82:3 85:19 92:8 105:19 exchanged 12:7 20:2 exclusion 84:17 excuse 53:12 75:10 99:12 exercise 50:14 61:21 exhibit 5:3,7,9,12 5:15,16,20 9:15 9:20 15:3,8 19:1 24:12 32:10,10,13,20 33:16,18,22 34:12 35:6,7 37:13 39:7 40:9 40:12,20 41:1,9 41:12 68:7 69:18 71:2,11 73:6 74:10 93:20 95:17,22 96:5,10,13 97:17 98:1 99:14,15 100:7 101:6 103:3 104:7,11,15 105:1 108:3,8
--	--	--	--	--

108:14 109:3,5 112:14,19 113:20 115:12 115:17 exhibits 4:19 5:1 5:5 41:5 97:2 110:2 115:13 115:15 116:4,8 116:22 exist 84:19 existed 84:16 existence 43:12 82:9,16 existing 29:15 expand 27:1 expect 45:17 expedited 118:2 118:4 experience 21:7 25:14 26:3 28:1 28:3 expert 11:10 36:5 37:8 explanation 89:7 exposed 26:3 express 120:22 extensively 36:12 extinguishers 23:18 82:11 extremely 30:19 extremes 80:15 81:1	32:19 33:21 81:12,17,19 84:21 108:13 116:15 far 41:3 fed 29:16 federal 83:7 fee 101:10,19 FELDBERG 3:5 field 20:7 36:12 fight 24:11 fighting 22:3 figure 30:18 56:18 99:15 Figures 57:6 filing 93:5,16,22 94:12 final 111:17 financially 119:12 find 74:21 78:10 78:20 79:9,16 80:5 93:14 116:3 findings 106:22 fire 21:5 22:2,8 22:11,15,20 23:11,13,17 24:2,3,7,11,21 24:22 25:15 26:1,9,15 41:21 42:5,11,15,18 43:4,10 44:9 45:15 48:8,15 49:13,16,18,22 50:5,16,20 54:2 69:22 81:15 82:3,4,10,11 86:7,18,22 87:1 87:3,10,15 88:6 88:8,14,15,18 88:19,20 89:11 89:22 90:11,13 90:14,16,20,20 91:17,22 92:12 92:15,21 111:18	firefighter 24:10 45:14 fires 22:4 23:12 first 6:4 10:17 12:15,22 13:2,4 15:17 17:4 19:7 19:18 24:18 34:5 38:5 51:16 52:8 59:17 60:7 66:22 74:9 88:4 88:9 94:19 100:15 101:6,8 FISHERBRO... 3:14 120:2 five-minute 33:10 flow 28:16,21 fly 22:1 focus 62:22 66:22 focused 31:14 89:11 105:15 106:4 follow 84:15 follow-up 59:22 followed 102:1 follows 6:5 footnote 104:6 forbidden 120:21 foregoing 119:5 121:10 foremost 88:9 forget 13:21 90:19 form 9:1 13:1 19:19 20:9 39:20 42:8,22 43:14 55:18 56:6 57:8 58:8 59:8 60:4 62:4 63:22 66:4 71:4 72:14 73:15 74:13 76:10 81:2 83:14 89:3 89:20 94:22 96:22 98:15 101:2,17 106:13 107:20	110:5,20 112:3 116:12 format 67:11 69:10 70:1 76:2 76:7,12,17 77:10,20 forming 14:14 96:20 107:4 108:21 109:14 110:11,15 111:11 112:1 112:12,18 forms 22:16 forth 23:18 64:22 119:7 forward 120:14 found 49:8 107:2 fragmented 30:19 frame 16:1 frankly 11:5 12:6 17:11 56:1 95:7 95:12 98:10 Friday 1:14 2:4 front 15:8 95:15 full 6:12 23:6 35:14 38:22 39:17 68:3 80:8 fully 68:4,9,15 72:12 73:16 74:3,15 75:2,5 75:9,10,15,16 75:18,22 77:16 78:5,14,17,20 79:12 80:6,13 functional 55:21 56:8 functionalities 30:11 functionality 28:10 30:13 functionally 55:12 functioned 29:3 functioning 23:22 functions 48:10	63:20 66:2 further 69:2 89:6 117:8 119:5,8 future 84:17 G g 54:21,22 geez 71:6 general 21:14 23:9 38:20 68:20 112:10 generally 14:18 18:11 21:13 31:11 65:21 81:22 98:6 101:3,14 102:20 106:11 107:6,7,16 110:3 generate 28:16 generating 69:21 generic 50:8 generically 14:18 32:7 50:7 getting 27:19 47:7 give 7:19 32:22 92:7 97:4 given 47:2 56:14 56:14 116:15 117:1,18 121:12,15 giving 118:1 go 7:18 24:12 34:11 38:17,21 41:18 45:1 50:13 66:11 69:1,7 74:16,18 74:20,21 78:9 78:19 79:9,16 80:4,18 87:6 89:14 90:22 97:3 105:19 112:7 115:19 115:21 117:4 goes 41:20 going 7:16 11:4
F f 54:21,22 face 94:8 facsimiles 100:20 fact 29:22 47:14 83:3 fair 9:11 39:21 51:18 66:5 102:10 105:14 111:7 fall 61:22 familiar 11:11,15 13:19 16:11 25:11,20,22				

32:9 40:19 41:1 50:11 70:21 77:4 79:4 86:4 91:4 good 6:8,11 7:22 73:18 74:1,4,14 85:18 gotten 11:1 governing 120:15 gravity 27:13 29:14 gravity-based 29:8 Great 15:13 55:5 greater 28:20 ground 7:18 group 1:20 46:13 120:19,20 121:1 122:1 groups 56:20 guess 17:11,12 26:21 30:3 51:18 64:4 74:4 85:18 87:22	119:7 hesitate 120:16 high 5:17 31:20 108:9 higher 29:11 Hilliard 5:12 6:14 15:4 history 90:5,10 92:18 110:13 110:18 112:5 113:12 holler 41:6 hood 92:3 hour 8:5 hourly 18:10 hours 18:15 Houston 3:16 120:4 hydrant 41:22 42:1,5,11,16,18 43:4,6,11 44:10 45:11 48:8,10 48:15,17 49:13 49:16,19,22 50:5,16,20 54:2 69:22 86:7,22 87:15 88:6,8,16 88:19,20 89:22 92:21 111:19 hydrant-related 90:15,16 hydrants 25:15 26:1,9 86:19 87:1,3,10 88:14 88:18 89:12 90:11,13 92:13 92:16	57:16,22 illustration 61:2 72:16,20 illustrative 61:11 impending 70:2 implement 57:18 implementation 58:21 implemented 50:5,16 85:20 important 50:13 79:2 80:3 improve 105:3 incidents 22:4,5 include 45:22 48:1 70:3,6 71:14 72:6 73:8 76:17 77:1,19 90:19 97:7 107:15 116:17 included 9:19 24:19 37:3 59:7 71:21 96:20 98:17 110:17 114:15 includes 45:21 64:13 67:11 76:7 77:10 87:1 90:13,14 including 21:2 24:21 26:6 27:21 28:14 45:13 85:14 120:21 inclusion 76:2 inclusive 88:15 incorporated 111:15 independent 82:6 indicate 4:21 individual 75:14 82:15 individuals 45:12 industry 105:12 105:15 106:10 inform 47:17 information	14:12 30:8 42:1 43:6 48:11,17 53:11,12,13,16 53:18,19 55:7 55:16 56:10 59:20 60:16 62:13,14 65:22 66:19,20 67:1 69:6,8 71:20 72:12 74:22 77:20 78:4,15 80:4,17,20 82:2 83:4 informed 73:16 74:3,15 75:2,5 75:10,15,16,18 75:22 80:7,13 infringement 112:15,17 inhibit 24:1 input 42:1 43:6 48:17 inputting 48:10 56:13 inquiry 11:9 insight 44:6 inspected 45:12 inspection 26:8 26:14,18 28:5 53:12,13,16,19 56:10 60:16 62:13 67:12,13 69:11,12,20 70:4,5 71:16,17 72:8,9 73:10,11 76:3,8,18 77:11 77:12 79:18 84:20 102:16 inspections 77:2 inspector 62:10 63:7 inspectors 70:3 71:14 72:7 73:9 98:7,20 99:22 100:8 installed 30:15 instances 46:9	instruction 69:1 instructions 69:22 insurance 99:21 integrating 21:5 intended 47:2 intent 84:14 inter 6:19 14:15 interest 7:17 116:2 interested 119:12 interface 99:20 internet 100:19 106:12,18,21 interpret 51:16 57:11 113:4,15 interpretation 51:1,6,9 83:10 90:9 106:15 interpreted 90:3 90:3 113:10 interpreting 57:12 interrelationship 56:21 58:13 interrelationsh... 57:21 58:17 59:6 60:19 interval 77:15 introduced 33:16 invent 83:13,20 83:22 invention 42:4 43:12 45:5 47:6 49:4 83:11 84:4 84:12,15 85:17 91:5 93:11 107:3,18 109:20 110:4 113:16 inventions 94:4 inventor 34:6,9 35:3,11 44:7,22 inventor's 43:16 inventors 11:14 11:17 34:8 inventory 97:4
H H 1:12 2:2 4:2,5 6:3 119:3 120:1 120:8 121:8 122:9 halfway 99:18 handheld 84:22 85:2,6 happen 27:15 29:18 happened 7:14 hard 97:17 99:19 hazy 13:6 16:21 head 45:2 health 22:5 hear 29:19 103:16 heard 59:19 heavily 27:16 help 15:1 52:7 93:18 hereinbefore	I idea 68:14,15 84:18 identification 32:15 identified 94:7 illustrated 35:16 illustrates 99:16 illustrating 37:4			

involve 20:13 30:10 involved 21:18 27:8,8,16,18 35:20 36:15 42:20 50:1,2,8 50:9 58:19 107:8 involving 6:20 28:2 64:13 65:6 65:8,15,20 IPR 1:5 10:18 11:7 14:21 15:20 16:19 17:6,10 18:5 19:18 20:3 IPRs 19:12 issue 5:21 29:6 30:22 104:16 issued 35:1 items 55:3	98:2,6,10,17 99:1,6 100:7,7 100:21 101:6 102:6,13 115:1 115:17 116:8 kind 10:22 21:22 30:5 43:17 46:7 61:3 62:12 69:2 74:20 77:22 82:4,11,13 kinds 26:6 90:21 kitchen 92:3 Knight 1:18 2:5 119:1,17 knock 8:11 know 7:17,19 8:9 13:14,17 17:15 18:13 19:22 20:4 21:11 33:4 37:16 41:14 43:16,19 44:12 44:21 47:1,8,10 49:10 55:14 56:9 60:18 66:10 78:11 79:5 80:3 81:7 91:3 93:17 95:5 104:13 109:7 knowledge 24:16 24:20 82:7 known 40:5	110:19 learn 10:17 learned 11:6 legal 28:2 LEHMAN 3:5 Leroy 13:19 let's 8:10 27:4 34:11 40:8 41:11 47:11 49:6 62:22 64:2 66:11 68:5,18 88:3 90:22 93:2 97:16 101:5 102:12 103:1 113:18 117:3 level 62:13 life 23:2,5 106:2 106:4,8 life-safety 21:9 21:15,19,20 22:7,14,19,21 23:14,20 24:6 24:21 25:4,11 25:14 26:1 82:10 106:1 life-saving 20:14 20:16 lift 29:11 limitation 54:12 54:13 57:5 59:13 60:3 76:11,20 limitations 82:21 limited 45:13 86:18 87:3 line 30:4 41:18 41:20 42:7,16 44:4,19 45:8,10 45:11 46:2 47:13,19 54:15 54:15 55:3 67:5 75:20 77:8 83:6 86:6 91:6,9,9 91:12,12,18,22 92:4,8,12 99:19 122:11 lines 37:15 38:3	39:6 44:18 47:17 48:9 52:9 69:13 92:7 liquid 24:8 Lisa 1:18 2:5 119:1,17 list 69:20 70:3 71:14 72:6 73:8 78:19 listing 23:15 literally 29:10 30:15 little 43:1 54:10 73:2 LLC 1:4 120:6 121:7 122:1,8 LLP 3:5,14 120:2 local 36:17 83:6 location 22:22 36:18,18 location-related 34:19 35:18 log 79:9 80:4 login 78:9,19 long 12:21 longer 10:13 look 37:13,15 38:3,18,22 40:8 47:11,13 67:3 68:5 69:17 80:18 86:4 88:3 93:2,2 97:16 99:11 101:5 102:12 103:1 104:10 108:2 113:18 looked 38:16 39:1 looking 18:22 41:9 45:9 70:15 70:22 74:9 75:20 103:20 104:2 114:22 looks 35:8 lot 106:7 Louis 27:9,11 28:3 29:16	M M 1:21 121:2 122:2 maintenance 26:9,15,19 28:5 30:9 42:2 43:7 48:11,18 major 30:21 majority 19:4 making 101:18 managed 88:11 89:2 105:17 management 1:4 20:7 36:13 41:22 42:5,12 42:16,19 43:5 43:11 44:10 48:8,16 49:14 49:16,19 50:6 50:17,21 54:3 58:11,21 69:22 86:7,22 87:15 88:6,8,20 89:11 89:22 92:20,22 98:22 99:1 111:19 managing 32:8 manner 4:19 56:5,15 mapping 75:13 75:17 78:1 80:1 Marine 3:8 mark 114:6 marked 5:2,5,6 15:2 32:15,20 33:16 35:6 40:11 41:12 97:22 104:14 108:7 109:4 marking 32:11 marshal 45:15 materials 9:19,21 12:8,11 107:1 matter 6:10 12:14,16 31:1,2 47:7 106:19 120:11
J Janoulis 5:4 32:14 January 93:6 94:19 95:8,11 JOM 100:17 101:16 JORGENSEN 3:5 June 1:14 2:4 4:3 5:19 6:2 108:11 108:19 119:22 120:7 121:8 122:10 jurisdictional 62:11 98:7,20 98:22 99:22 100:8	L L.L.C 121:1 labeled 33:22 86:5 lake 27:10 29:15 29:16,18 lakes 27:11 large 26:3 late 12:5 law 83:7,7 lawn 22:19 laws 84:8,11 laying 75:14 layout 109:21 leading 60:21	level 62:13 life 23:2,5 106:2 106:4,8 life-safety 21:9 21:15,19,20 22:7,14,19,21 23:14,20 24:6 24:21 25:4,11 25:14 26:1 82:10 106:1 life-saving 20:14 20:16 lift 29:11 limitation 54:12 54:13 57:5 59:13 60:3 76:11,20 limitations 82:21 limited 45:13 86:18 87:3 line 30:4 41:18 41:20 42:7,16 44:4,19 45:8,10 45:11 46:2 47:13,19 54:15 54:15 55:3 67:5 75:20 77:8 83:6 86:6 91:6,9,9 91:12,12,18,22 92:4,8,12 99:19 122:11 lines 37:15 38:3	longer 10:13 look 37:13,15 38:3,18,22 40:8 47:11,13 67:3 68:5 69:17 80:18 86:4 88:3 93:2,2 97:16 99:11 101:5 102:12 103:1 104:10 108:2 113:18 looked 38:16 39:1 looking 18:22 41:9 45:9 70:15 70:22 74:9 75:20 103:20 104:2 114:22 looks 35:8 lot 106:7 Louis 27:9,11 28:3 29:16	managing 32:8 manner 4:19 56:5,15 mapping 75:13 75:17 78:1 80:1 Marine 3:8 mark 114:6 marked 5:2,5,6 15:2 32:15,20 33:16 35:6 40:11 41:12 97:22 104:14 108:7 109:4 marking 32:11 marshal 45:15 materials 9:19,21 12:8,11 107:1 matter 6:10 12:14,16 31:1,2 47:7 106:19 120:11
K Kathleen 5:22 104:18 key 5:11 42:12 43:4 95:16 96:17 97:8,16	known 40:5	known 40:5	known 40:5	known 40:5

matters 7:12	mind 33:7 44:7	74:8,11 77:19	number 5:2,6	October 94:1,14
MBA 31:16	44:12,22 61:21	neglected 115:9	24:14 26:4	94:15,16,17
McKinney 96:10	86:16	neither 119:9,10	37:13 41:19,19	95:8,10
96:12,18 97:9	mind-blowing	networking	44:18,19 47:13	offer 75:8
115:18 116:9	30:6	34:20,22	49:7,8,9 54:14	offered 50:22
McNulty 13:20	minimum 63:16	Never 86:16	54:15 66:17	51:5,22 67:14
14:2,8,12,18,20	minute 63:1	new 29:13 32:10	67:5 68:6,7	67:19 68:2
15:18 17:15,18	117:4	83:13,20,22	69:18 70:14	77:18 80:11,15
mean 13:2,5,16	missing 97:15	84:1	72:5 73:7 91:12	office 1:1 120:12
16:9 18:9,10	mistake 114:18	NFPA 81:12,14	92:8 99:11,13	120:16
38:19 42:9	mobile 34:22	81:18 82:7 84:1	99:14 103:2,3	oh 37:18 38:1
47:20 50:2,8	85:15	nonemployee	113:19 115:11	71:6 72:3 93:17
53:1 55:10 65:8	modifications	34:8 35:2	116:5	95:2 103:20
68:21 72:19	29:4 84:17	NOTARY	numberings	104:9 114:22
73:22 74:4 95:4	moment 33:1	121:22	99:20	okay 7:3,7,13,16
98:9 112:4	month 13:15	NOTE 4:18	NW 1:21 121:2	8:2 9:18 10:2,6
115:4 116:18	18:12	noted 118:8	122:2	10:13,17 13:18
117:17,21	Moren 5:8 11:12	121:13	O	15:11 16:11,17
118:1,2	11:16,20 12:8	notes 10:7,9,11	object 102:3,9	18:14,22 20:12
meaning 55:11	12:11 14:6,7,13	10:14	objection 9:1	28:8 30:3 34:11
means 50:10	14:17 16:22	notice 2:1 65:11	13:1 19:19 20:9	36:22 37:21
68:20 75:10	17:14,18 40:13	65:17 67:10,15	34:1 38:14 39:8	38:4 46:1 47:11
87:16 100:19	Moren's 12:22	67:20 68:3,16	39:20 40:4 42:8	48:6 49:5,18
meet 57:4 58:6	15:22 82:1,5	69:5,9 70:1,2,6	42:22 43:14	51:19 52:1,2,3
59:7,13 60:2	morning 6:8,11	71:13,20 72:6	55:18 56:6 57:8	54:9,17 56:3
75:19 76:1,8,15	move 99:8	72:10,11,13,21	58:8 59:8 60:4	60:12 61:20
79:19 80:19,21		73:8,13,14,18	62:4 63:22 66:4	62:21 63:18
82:21	N	74:1,5,8,14,17	71:4 72:14	65:18 66:9 68:2
meeting 8:19	N 3:1 4:1	75:2,12,18,22	73:15 74:13	69:17 75:8
memory 15:15	name 6:9,12	76:7,12,16,22	76:10 81:2	76:22 77:13
mention 116:3	20:18 121:8	77:4,10,16 78:4	83:14,21 84:6	78:22 79:14
message 79:10	122:9	78:8,11,21 79:8	89:3,20 94:22	81:10 84:21
met 8:17	named 34:6,6	79:17,20 80:7	96:22 98:15	88:1,2,13 89:17
metes 23:8 78:16	narrowed 92:19	80:13,15,20	101:2,17	90:8,22 91:7,16
79:1 80:8 88:5	National 81:15	noticing 120:14	107:20 110:5	91:21 92:2,6,11
metes-and-bou...	NCRA 119:18,19	notification	110:20 111:6	93:4 94:18
75:4 78:1 80:1	119:20	67:10 77:9	112:3 116:12	95:14,21 96:9
method 34:21	necessarily 4:21	100:15,17	objects 100:1	96:17 97:13
49:16 50:5,16	116:16	notifications	obtain 31:8	98:5,13,19 99:7
85:12 114:13	necessary 24:9	100:22 103:7	obvious 10:12	99:18 100:14
114:19 115:8	need 7:21,22 8:8	103:14,18	obviously 114:15	101:7 103:4
methods 85:20	60:21 62:8	104:2	obviousness	104:21 108:2,6
metrics 36:20	64:16 66:10	notified 102:15	51:15	108:17 109:2
Michael 16:12	69:4 75:1,20	notifying 64:18	occurred 10:3	109:10 110:11
Miller 16:12,18	105:2 115:21	67:9 70:1 77:7	occurs 44:13	110:15 111:9
17:18	needs 40:21	77:8	52:9	113:22 115:2
Miller's 17:4	44:10 60:20	noting 120:14		115:11 116:6

117:12	23:13 79:17	73:6,13 74:9	patent 1:1,2,7,8	64:10 65:4
old 30:18,20	82:5 116:2	77:18 87:12,21	3:13 5:3,7,9,13	106:12
115:9	overall 62:13	88:3 91:9,11	6:18,20,21 7:4	performing
ones 81:21 97:4	owner 1:8 3:13	93:19 94:13	7:4 9:12 11:18	65:16 66:1,5,6
116:17	6:18,21 45:14	99:11,12 100:7	11:20 15:4	101:15
online 20:4 98:22	53:22 54:1 62:9	100:14 101:5	32:12,14 33:17	period 110:3
Oops 115:3	63:6 64:6,10,13	102:12,17	33:22 34:5,9,20	120:15
opening 90:2	64:14,19,19	103:2,5,10	34:20 35:4,12	permutation
operation 27:10	65:4,6,9,11,11	113:19 114:7	35:16 37:1,6	23:7
operative 100:16	66:2,19,20,21	115:11,13	38:16 39:1,12	PERQUE 3:14
opined 94:10	67:1,9 70:2	116:3,4	39:17 40:9,12	9:1 13:1 19:19
opinion 35:9 37:8	77:4,8 80:2	paragraphs	41:10 42:4,17	20:9 32:22 33:6
39:11 45:7 51:1	99:5 100:9	68:19	42:20 43:13,22	34:1 38:14 39:8
51:5 67:14,19	101:9,12,21	paraphrase	44:4,14 49:6	39:20 40:4 42:8
68:3,22 75:3,9	102:2,7,15,18	50:12	51:2,7,12 53:20	42:22 43:14
78:8 79:7 80:14	113:6	Parkway 3:8	57:7 63:4 64:11	55:18 56:6 57:8
96:20 98:12	owner's 5:14	part 14:5 25:4	66:18 67:4 74:7	58:8 59:8 60:4
99:5 105:1	15:5 112:14,21	29:5,17 35:10	75:11 76:1,16	62:4 63:22 66:4
115:16 116:21	owner-enabling	35:19,22 36:22	79:20 83:12,19	71:4 72:14
opinions 14:14	114:3	37:3 39:12 56:8	84:5,13 89:10	73:15 74:13
51:21 106:14	owners 98:7,11	57:14 67:1,17	89:21 91:1,13	76:10 81:2
107:4 108:21	98:21 100:1	83:11 105:5	91:13 92:19	83:14,21 84:6
109:14 110:1		109:1,16	93:3,6,22 94:5	89:3,20 94:22
110:12,16	P	110:17 114:16	94:8 97:21 98:1	96:22 98:15
111:12 112:1	P 3:1,1	114:18	106:16,20	101:2,17
112:12,18	p.m 118:8	partes 6:19 14:15	107:19 110:4	107:20 110:5
116:10	page 24:14 34:14	particular 23:5	110:13,19	110:20 111:6
opposed 47:6	37:14,22 41:12	32:12 34:13	111:11 112:1	112:3 116:12
option 120:13,13	49:7,8 68:7	37:14 38:2	112:14,20,22	117:11,21
oral 1:12 2:1	69:18,19 70:14	41:11,20 47:7	113:5,6,8,16	person 24:16
order 22:13 57:4	70:20 71:2,11	49:2 52:18	114:10,21	25:5
76:15 82:21	72:5 73:7 93:3	55:15 56:5 64:8	patent's 75:12	perspective 37:8
118:3	93:19 99:13	76:20 80:17	89:19	93:10
orders 117:15	103:3 113:21	82:20 85:8 92:4	patents 9:8	petition 5:14
ordinary 24:16	120:14 121:6	104:5 105:17	Patrick 3:6 6:9	15:5 89:9
25:5 37:9 93:10	122:11	114:2	Pause 33:3 41:16	petitioner 6:20
106:15 113:14	pages 99:14,14	particularly	104:20 109:9	51:13
organized 56:4	103:12 121:10	24:14 30:14	payment 101:10	petitioners 1:5
original 73:1	paid 18:13	36:9 62:1,9	101:19	2:3 3:4 6:10
120:14	paper 30:20	64:5 70:12	pcolsher@reic...	89:9
originally 17:22	paragraph 24:14	73:20 92:11,21	3:7	phrase 27:5 81:4
18:2	24:20 34:14,15	parties 52:14	pending 8:10	phrasing 43:15
outer-bound	35:5 36:21	62:10 119:9	Perfect 66:9	pieces 22:17
81:7	47:13 68:6,8	parts 21:2	perform 48:10	77:19 78:4 82:9
Outlook 5:20	69:18 70:8,12	passage 45:19	63:20 65:14	112:6,8
104:16	70:13,16,17	92:15	75:1	pipes 29:17
outside 9:19	71:1,10,19 72:5	passages 14:16	performed 51:10	place 12:2 117:14

119:6 placement 28:12 places 53:9 played 13:22 plays 42:12 please 6:13 117:14 120:10 120:13,14,15 plural 46:18 47:4 47:16 plurality 46:13 point 26:6 34:13 61:1 80:9 81:11 points 21:3 police 21:6 22:2 portion 45:17 portions 36:8 57:18 POSA 54:5 60:17 62:14,19 78:2 positions 51:22 89:10 possible 23:7 possibly 13:16 95:10 post 31:20 post-dated 110:2 postdate 107:18 potential 11:9 potentially 24:1 28:11,20 29:5 48:3 58:9 61:15 62:15 81:7 practical 58:20 practices 112:21 practicing 113:7 precise 63:11 predate 84:12 predated 107:2 predominantly 106:9 preexisting 84:5 preparation 8:21 9:5,21 10:6,10 10:14 15:19 17:5,19,22 95:18 96:1,6,11	96:14 prepare 8:13 present 14:8 pretty 99:4 prevention 23:10 24:7 81:15 Previously 5:5 15:2 40:11 97:22 104:14 108:7 109:4 primarily 78:7 principal 99:16 prior 26:11,13,17 30:7,16 51:12 79:4 96:19 97:8 110:16 111:3 111:20 112:6,9 119:2 priority 94:6,12 107:8 109:19 privacy 34:19 35:1,18 proactive 5:21 103:7,7,14,15 103:18,19 104:1,3,7,17 107:11 probable 16:8 probably 13:12 64:12 65:7 74:6 105:19 111:7 Procedure 120:15 proceeding 6:19 9:16 10:4 11:7 12:12 17:20 18:16 19:2 32:21 34:17 35:7,11 36:6 37:10 40:10 42:21 51:7 86:5 95:19 96:2,7,13 96:15,21 97:10 107:5,18 108:15,22 109:15 111:5 112:13,20	113:3 PROCEEDIN... 6:1 process 55:13,21 56:12 61:4 processes 21:18 program 5:22 41:22 42:6 47:15 48:9,16 104:8,18 Project 5:15 109:5 proposed 29:4 prosecution 90:5 90:10 92:18 110:12,18 112:5 113:11 provide 6:16 37:7 89:7 110:1 111:2 116:20 provided 14:13 19:13,14 23:15 35:9 39:11 79:3 82:2 85:18 98:21 100:9,22 115:16 116:10 provides 69:5 99:21 providing 21:19 24:8 34:22 49:3 78:13 provisional 93:16 93:22 94:7,20 94:21 public- 21:2 public-safety 26:5 Publication 5:10 97:21 98:2 pull 104:12 pump 27:13,14 29:9,11 pumps 28:11 punch 30:4 purchased 120:12 Purdue 31:15,19	purpose 29:20 Pursuant 2:1 purveyor 45:14 put 32:9 40:19 41:1 98:4 102:21 104:11 Q qualifications 34:16 35:10 36:4 37:2,7 qualified 70:3 71:14 72:6 73:8 qualify 22:6,13 23:20 qualifying 14:4 Quantifying 5:16 108:9 question 8:10 25:9 43:1 51:4 59:16,17,18,21 59:22 60:7 70:20 72:2,17 73:1 77:5 87:2 90:2 99:7 114:6 115:5 questions 117:9 117:11 120:15 121:13,15 quick 37:12 113:19 quite 11:3 60:19 quotations 4:18 quote 4:21 R R 3:1 range 45:12 ranging 23:16 rate 18:10 105:4 RDR 1:18 re-review 97:3 re-reviewed 8:16 16:15 97:5 reacting 25:8 read 4:20 64:16 64:16 65:1	89:18 105:20 113:6 121:9 readily 25:12 reading 77:7 83:5 119:7 reads 100:15 ready 120:11 real 113:18 real-time 52:22 53:2,4 86:8,13 realize 54:6 60:17 62:19 realized 70:19 really 61:1 95:9 Realtime 2:6,6,7 119:2,19,20 reason 39:5 107:14 reasonable 17:12 45:16 81:6 reasons 10:12 111:10,22 recall 9:4 11:6 12:1,15,20 15:17 17:3,8 18:14 25:7 31:6 97:11 receipt 65:16 receives 66:19 67:2 receiving 65:11 65:15,22 Recess 33:12 66:12 117:5 recognize 25:12 62:14 78:3 record 4:20 6:13 8:11 33:15 39:10 40:19 54:10 66:11 117:4,14 recorded 121:13 121:15 records 17:16 19:17 52:22 53:2,4 55:7 58:18 59:3,12
--	--	---	--	---

60:2 86:8 Redwood 3:10 refer 72:5 73:7 reference 73:12 78:3,6 85:5 95:17,22 96:5 96:10,13 97:2 97:20 112:5 115:13 referenced 37:1 116:4 120:11 references 64:18 96:19 111:3 114:2 referencing 35:5 referred 21:21 44:19 54:18 84:12 103:6 referring 24:19 27:2 44:9 45:7 46:2,13 48:3 54:11 55:20 68:13 71:19 72:11 73:14 78:7 87:9 88:13 88:17,21 102:18 114:7 refers 43:22 reflected 4:19 regarding 16:18 102:8 Registered 119:1 119:18 registry 54:3 regulations 84:7 84:11 REICHMAN 3:5 rejection 102:14 related 20:7,13 22:14 31:4 36:13 relating 92:18 relative 79:3 87:10 106:16 119:9,10 relevant 36:4 37:1,7,11 105:2	107:12 110:3 116:9 relied 107:3,17 108:20 109:13 relies 84:5 rely 14:11 42:5 42:10 94:18 relying 104:22 remember 9:9 10:21,22 11:5 12:4,5 16:1,16 19:10,15 27:7 95:7,11 110:21 111:14 112:9 113:1,2 reminders 42:2 43:7 48:12,18 remote 7:14 36:16 remotely 1:13 2:3 3:2 8:17,20 54:2 64:20 repeat 51:3 59:21 72:1 83:15,17 replace 27:12 report 19:8 reported 1:18 2:5 Reporter 2:6,7 119:2,2,18,19 represent 116:1 representation 116:16 represented 117:1 representing 6:10 requested 119:8 require 52:17 53:5 56:3 57:9 57:20 61:10,17 76:1 82:18 85:2 85:7 required 58:5 59:6,13 60:2 65:22 66:2 75:19 80:17 requirement	58:7 67:20 76:6 76:13 requirements 56:9 67:15,22 72:20 82:14 requires 49:13 49:18 55:15 57:5 61:6 requiring 83:5 requisite 101:10 101:19 residences 27:21 residents 27:10 27:15 resigned 30:1 respect 51:11 62:9 64:6 75:14 90:4 respective 107:8 respond 24:2 responding 22:4 23:11 Response 5:14,18 15:5 108:10 responsibilities 62:7 rest 19:5 result 29:4,7,20 resulted 34:20 retrieval 61:4 retrieving 56:13 86:6 review 6:19 9:18 9:21 10:2 14:15 15:12 16:14 54:4 95:16,21 96:4,9,12,19 102:14 110:16 111:9,20 112:14,16,20 120:12 reviewed 8:15 9:5,12 12:10,13 12:16,22 13:2,3 13:4 15:18 17:4 17:13,17 19:9 35:13 46:4	49:21 52:5,20 53:7 55:9 63:5 68:11,17 69:15 71:22 72:15,22 76:4,19 77:3 81:3 82:22 85:4 85:10 86:14,20 87:4 89:4 91:19 92:14 93:13 94:9 95:1 97:1 99:2 100:11 103:9,22 105:9 105:13 110:12 111:13 112:4 113:9 114:12 116:14 reviewers 98:8 98:20 100:1,9 reviewing 15:22 54:6 56:13 64:21 66:6 revisit 8:1 Richmond 3:15 120:3 right 7:8 20:8 22:15 23:2 25:2 32:1 36:7 37:2 40:3 44:15 49:14,20 50:10 51:2,8,10,17 52:4,10,12 54:15 60:14 63:4,9,21 66:3 67:16,21 69:12 74:12 75:12 76:18 77:21 78:22 79:21 80:22 84:5,13 86:13,19 87:21 88:1,11,12,14 88:18 89:2,19 90:12 91:8,14 91:15,17 92:4,9 92:13,22 93:6 93:12 95:2 98:8 98:14 99:1 101:1,11,16,21	102:9,19 103:8 105:4,8,12,17 106:1,5,17 107:19 108:22 109:15 110:4 110:13 111:5 113:16 115:7 115:18 116:11 116:22 117:3 role 13:22 16:16 42:12 roles 62:7 rough 117:20,22 118:6 roughly 8:5 15:21 RSA 1:18 rule 83:7 rules 7:18 82:14 120:15 run 28:20 running 8:7 runoff 27:20 28:16 29:10 S S 3:1 safety 21:3 23:2,5 106:3,5,8 safety-related 22:17 save 104:4 saying 55:22 61:9 114:19 says 24:18 34:18 38:6 45:11 47:14 48:15 50:15 63:12 79:8 80:3 89:8 89:22 99:20 100:13 scale 58:18 59:3 59:12,18 60:1,5 scattered 30:20 schedule 42:2 43:6 48:17 scheduled 102:16
--	--	--	--	---

scheduling 48:11	101:8 102:13	46:20 47:3,18	46:16 56:19	89:5 94:13
schema 56:18,19	114:1	48:1	83:9 88:17,22	110:7 116:14
57:6,21 61:2,12	separate 63:8	sitting 39:4 45:6	89:7 90:11	stated 48:14
school 31:20	separately 91:16	97:11	111:15	88:22
Science 31:13	91:21 92:2	size 58:15 60:13	specification	statement 38:20
scope 34:2 38:15	series 27:14	skill 24:16 25:5	56:17 57:14,15	39:5 43:3 44:13
39:9 43:16	server 38:6,7	36:5 37:9 93:10	83:2 85:13 90:5	46:17 100:4
87:10 88:10	service 21:20	93:10 106:15	90:9 113:11	102:11
89:1 90:10	42:3 43:8 48:12	113:14	specifics 45:1	states 1:1 41:21
scroll 24:13	48:19	skit 80:5	specified 48:5	114:1
41:11	services 21:19	Social 34:22	62:18 63:13	station 27:13
se 49:2	22:3	software 41:22	specify 55:6 59:2	stations 27:14
search 115:19,22	set 119:7	42:6,12,16,18	59:5,11 60:1	29:9
searching 106:13	severely 24:1	42:19 43:5,11	61:17 80:16	status 54:4 64:21
106:18,21	sewage 27:10	44:10 48:8,16	86:1 92:20	STENOGRAP...
second 33:6	28:17 29:10,14	49:14,17,19,22	spent 18:5	117:13 118:7
70:22 87:20	sewer 27:13	50:6,17,21 54:3	sprinkler 22:6,8	STENOGRAP...
88:4,7 102:22	28:10,21 29:1	64:20 70:1 86:8	22:9,11,18,19	4:18
section 35:15	29:22	86:22 88:6,9,11	22:20 23:1,12	stenographically
44:14 45:5	sheet 120:14	89:2 90:1 92:21	24:22 26:19	2:5 119:6
48:22 74:2	121:14 122:6	92:22 99:16	27:21 28:6,15	step 51:16 101:9
87:12 88:2	shell 19:13,15	111:19	30:9 31:5 91:17	102:1,2,6
security 34:19	shells 19:11	solely 89:11	sprinklers 28:18	stops 75:6
35:18	shift 49:6	somebody 25:10	82:4 90:20	storage 61:3
see 27:4 38:1,1	Shores 3:10	somewhat 26:22	St 27:9,11 28:3	store 29:10
46:15 59:22	shorthand 7:4	27:3	29:16	stored 52:18 53:2
68:10,18 86:10	show 61:2	sophisticated	stakeholders	53:6 55:8,16,22
97:13 100:3,4,4	shown 41:13	61:5,7,10,13,18	105:3	58:5
102:4 103:20	sic 73:6 77:18	62:16	standard 67:11	storing 53:10
104:1,9	99:21	sorry 15:14	69:10 70:1 76:2	54:12 56:10
seen 46:9	sign 120:12,12	37:18,20 51:3	76:7,12,17	Street 1:21 121:2
selected 120:13	signature 120:11	67:17 70:7,10	77:10,20	122:2
selection 58:20	120:14 121:6	71:5 72:1 83:15	standards 5:15	strike 26:12 44:1
self-contained	121:17 122:22	83:17 93:18	84:7,11 109:5	57:3 58:2 68:4
74:11	signed 12:11,18	99:12 114:20	standpipe 23:17	70:10 75:21
self-identified	12:21 13:9 16:4	114:22 115:3	23:19 24:3,5	82:18 91:10
67:7	16:7 17:9	sort 61:21 67:6	standpoint 31:21	96:11 99:9
send 29:12	120:14	68:22 69:4 78:9	55:13	structure 55:21
100:16	signing 119:7	79:8 94:11	stands 20:19	stuff 112:17
sending 65:10	120:13	sorts 21:1 28:15	start 70:11	subject 10:18
76:12	similar 36:1	spare 7:16	starting 45:10	106:19
sentence 24:18	44:21 89:9	speak 36:5	53:9 83:3 87:12	submit 112:13
34:15 38:5	simple 61:3 87:7	specific 47:8	91:5	submitted 6:18
44:17 46:20	simplistic 56:1	57:20 64:17	starts 75:5 85:11	14:21 15:20
83:3 87:20 88:4	Sincerely 120:18	81:21 82:3,14	87:22	17:6,20 19:2
88:7,14 89:17	single 46:3	94:12,12	state 6:4,12 36:11	51:12 95:18
100:5,6,12,15	singular 46:12,18	specifically 25:7	46:5 70:20 83:7	97:10 111:4

112:19 subsequently 65:13 112:7 successfully 27:18 suitability 11:10 Suite 1:21 3:9,16 120:3 121:2 122:2 support 5:13 15:4 105:1 supports 68:14 sure 13:10 17:15 18:9,21 19:20 27:4 31:7 35:8 41:6 42:9 43:15 44:8 46:5 51:9 72:3 73:4 94:16 97:14 107:21 Sweeney 95:22 96:18 97:8 115:17 116:9 sworn 6:4 119:3 system 21:9,15 22:6,7,8,10,12 22:14,18,19,20 23:1,5,19,20 24:4,6,6 27:13 28:17,21 29:8 29:13,14,15,16 30:15 44:10 57:17 79:9 85:9 86:8 90:17 91:17,22 92:3 99:1 100:15 101:1,16 105:3 114:11,15 system/(method 114:5 systems 2:7 20:14,17,20 21:4,6,17 23:14 23:17 24:21,21 25:1,4,9,12,14 26:1,5,6,8,14 26:18,20 27:20 27:22 28:4,6,11	28:14,15 29:1,3 30:10,21 31:3,5 35:21 36:10,15 36:17 58:11 90:15 106:1 119:20 T tactical 58:20 take 7:21 8:4 10:7,9 33:9 37:12 40:8 41:11 64:2 68:5 97:16 103:1 104:10 108:2 113:18 117:20 taken 119:6 talk 91:4 talked 56:8 92:17 talking 17:21 18:2 46:11 54:13 60:16 66:17,18 68:9 71:2,13 88:5 89:18 101:9,13 104:6 105:11 105:22 109:21 talks 69:19 86:21 92:12,15 102:13 tap 24:10 targeted 82:17 task 78:19 79:10 teach 114:2 technical 38:21 55:20 technically 55:11 technologies 20:21 Technology 31:16 48:22 Tegris 1:7 6:19 6:21,21 120:6 121:7 122:8 telephone 100:20 tell 29:21 31:11 79:6	telling 61:8 Temporally 55:21 tendered 15:6 40:14 98:3 104:19 108:11 109:6 term 23:8 47:2 50:20 83:9 88:6 88:19 terms 21:11 45:1 47:9 51:21 56:9 56:12 74:7 107:11 111:17 114:18 test 15:15 testified 6:5 testify 119:3 testimony 6:16 7:20 10:3 119:6 testing 26:9,15 26:19 28:5 30:9 Texas 3:16 31:17 31:19 120:4 Thank 117:7,10 117:16 118:7 thanks 71:7 theory 112:15 thesaurus 50:13 thing 8:9 20:5 37:19 54:10 69:3 82:4,12 things 7:22 65:21 90:20,21 111:17 think 11:8 12:3 14:3,5,16,22 15:21 16:9,20 16:22 17:1 19:14,21 21:11 23:15 25:9 26:10,16 31:6 38:19 45:18 47:20 52:10,16 53:9 54:18 57:1 68:18 78:2 80:5 81:5 84:14,18	93:15 94:10 95:5,14 97:17 99:4 102:10 104:5 105:18 105:20 106:6 111:7 112:10 113:1 114:17 115:8,20 thinking 47:3 third 5:21 71:5 71:10,18 72:4 73:5,13 98:11 104:16 114:1 thought 60:6 three 8:18 63:2 63:12,13,16,18 98:12,16 three-day 117:19 threw 10:12 throughput 28:22 time 7:17 13:5 15:22 16:1 17:13 18:5 40:22 43:12 56:14 71:9 84:16,20 86:12 93:11,21 109:19 110:3 113:15 116:2 118:8 119:6 120:15 time-based 36:20 times 7:10 8:18 timing 10:22 93:9 titled 34:21 today 6:16 7:14 8:14,22 9:6,22 10:10,15 39:4 45:6 top 45:2 topic 107:10,12 touched 62:21 tracking 30:22 31:4 TRADEMARK	1:1 transcript 117:15 118:4 119:5 120:10,12 121:10 transcription 121:12,14 transition 80:9 TRIAL 1:2 trick 115:4 triggered 36:17 trouble 104:4 true 121:12,14 truth 6:5 119:4,4 119:4 truthful 7:20 try 8:6 71:9 79:14 trying 15:14,15 29:10 61:20 79:1 93:14 115:5 turn 86:3 93:17 two 8:17 11:21 31:10 65:21 81:7 type 38:9,12 46:11 48:4 67:12,13 69:10 69:12 70:5 71:15,16 72:8,9 73:10,11 76:3,8 76:18 77:2,11 77:12 79:18 88:10 89:1,12 92:9,13 types 22:2 48:5 56:20 58:17 59:5,19 85:19 85:20 typical 41:21 42:5 43:10,17 43:22 44:3 48:8 48:15 typo 114:9 U
---	---	--	--	--

U.S 5:3,7,9 6:21 32:12,13 33:17 34:20 40:12 97:20 98:1 ultimately 27:18 Um-hmm 91:2 understand 6:15 7:5,19 51:14 65:18 69:6 72:17 74:17 understanding 21:8,15 25:5 32:3,5 43:21 44:2 47:18 79:2 94:2 106:14 Understood 8:12 63:14 unfortunately 13:6 unique 62:2 UNITED 1:1 units 99:16 University 31:15 31:17,19 upcoming 74:22 update 54:4 updating 53:14 54:6 64:20 66:7 upstream 28:14 29:7 usage 27:19 50:20 use 43:16 44:3 47:2,15,16,18 47:21 48:13,13 50:8,19 52:8 57:5 104:5 106:2 107:7 user 42:1 43:5 44:19 45:7,18 45:19 46:3,10 46:11,12,16,20 47:16,19,21,22 48:1,4,4,7,16 62:22 63:2 64:5 69:6 85:9 102:7 users 47:15,22	53:14 62:6,8 63:9,12,19 99:6 100:9,17 101:1 uses 21:13 86:13 105:19 usually 45:11 utilize 19:12 V v 1:6 88:2 120:6 121:7 122:8 validity 51:15 113:5 variation 48:2 variations 47:21 variety 19:11 21:6 23:16 35:20 62:6 various 14:16 21:1 27:19,21 50:20 53:8 56:20 62:7,8 64:4,18 81:20 82:9 85:14,19 85:20 91:14 100:22 112:6 vast 19:4 verbally 48:20 verbatim 119:5 verbiage 115:9 versus 29:8 82:4 95:8 view 22:18,20 53:17 54:5 61:11 74:14 78:14,18 79:13 80:10 85:16 88:8 90:14 99:3 106:6 viewed 107:9 109:18 110:6 viewpoint 110:8 volume 58:18 59:3,12 60:1,10 W wade 95:4	waive 120:13 want 27:15 34:13 37:12,14 38:2 38:17,21 51:19 54:9 64:15 65:1 66:22 87:6 104:10 118:3,3 wanted 27:12 97:14 Washington 1:21 121:3 122:3 wasn't 25:10 97:15 water 24:9,10 27:9,19 28:16 28:19 29:22 45:14 way 32:7 55:15 55:19 57:16 59:18 64:1 ways 32:7 we'll 9:13 13:14 79:5 we're 33:9 37:18 41:5 52:10 71:13 79:4 86:4 91:4 we've 41:2 56:8 78:11 101:13 102:18 117:21 web 99:20 100:2 100:10 week 13:11 16:6 17:9 Welcome 66:15 well-known 38:8 38:10,13 39:18 40:2 went 30:2 33:15 Williams 1:12 2:2 4:2,5 5:13 6:3,8,14 15:4 20:6 32:2,17 33:16 39:15 40:16 50:22 66:15 109:8 117:8 119:3	120:1,8 121:8 122:9 witness 11:10 15:6 40:14 98:3 104:19 108:12 109:6 120:12 121:8,17 122:9 won 29:21 word 43:17 44:3 46:15 48:14 51:10 61:14 64:4,12 65:7,16 65:17 83:1 85:18 103:13 103:16 104:5 107:21 wording 21:12 50:12 52:13 words 47:9 98:9 98:16 106:2 work 21:4 26:8 26:14,18 28:8 29:2 30:8,10,12 31:2 34:18 35:11,17,19 36:1,3,9,14 37:5 worked 20:6,17 36:12 working 28:4 34:7 36:10 Workplace 5:18 108:10 world 10:22 wouldn't 48:13 74:16,19,20 write 19:7 written 12:8 106:8 110:1 120:22 wrong 14:4 16:10 wrote 19:3,4 X X 4:1 Y 	yeah 15:9,9 30:5 33:6 34:3 51:18 52:12 54:22 63:17 68:1 70:9 70:19 93:17,21 95:2 104:9 117:17 year 12:5,5 years 30:16 38:17 39:2 Z Zoom 1:13 2:3 0 0070 99:12 1 1 41:13,19 42:6 42:16 44:3,18 45:8,10 46:2 47:19 48:9 83:5 90:22 91:9,12 1(d) 54:1 10 94:4 10:04 33:12 10:07 33:13 10:48 66:12 100 3:8 18:20 1001 5:7 40:9,12 40:20 41:9 1005 5:9 95:17 97:17 98:1 99:15 100:7 101:6 115:17 1006 95:22 115:17 1016 96:5 115:18 1020 96:10,13 115:18 1036 5:3 32:10,13 32:20 33:17,22 35:7 37:13 39:7 104 5:20 108 5:16 109 5:15 11 34:14 94:4 11,126,966 1:7
--	---	---	--	--