1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3
4 _____
5 GOOGLE LLC,
6 Petitioner
7 v.
8 GEOSCOPE TECHNOLOGIES PTE. LTD.
9 Patent Owner
10 _____
11 Case No. IPR2023-01212
12 Patent 8,406,753
13 _____
14
15
16 DEPOSITION OF MARK A. STURZA
17 TAKEN REMOTELY BY VIDEOCONFERENCE
18 August 27, 2024
19
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22
23
24 Reported by: Mary Ann Payonk
25 Job No. 1578

GOOGLE EXHIBIT 1032
Google v. Geoscope
IPR2023-01210

August 27, 2024

3:01 p.m. Pacific

DEPOSITION OF MARK A. STURZA, reported remotely by videoconference pursuant to Notice and agreement of counsel, stenographically reported by Mary Ann Payonk, Shorthand Reporter and Notary Public, CA CSR No. 13431.

All attorneys participating in this deposition acknowledge that the reporter is not physically present in the deposition room and there is no objection to the oath being administered remotely.

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MARK ALAN STURZA,
called as a witness, having been duly sworn, was examined and testified as follows:

EXAMINATION

BY ATTORNEY FEDOWITZ:

Q. Okay, just to start off straight here, this is the deposition for or cross-examination for IPR2023-01212, US Patent Number 8,406,753.

Can you state your name for the record.

A. Mark Alan Sturza.

Q. Okay, Mr. Sturza. Good to meet you. I think my colleagues probably went over this before earlier today, but the way this is going to work is I'm going to ask you questions. You're going to answer those questions. If you don't understand something I'm saying, you can ask for clarification. If your attorney objects to something, you are to answer the question unless he directs you not to answer.

Do you understand that?

A. Yes, I do.

Q. Okay. Mr. Sturza, how'd you prepare for today's deposition?

A. I -- I'm sorry, I missed it. Could you repeat that, please?

Q. Sure.
How did you prepare for your deposition today?
A. I reviewed my report. I reviewed the exhibits. I spoke with Mr. McBride.
Q. Okay. And when did you prepare for your deposition?
A. So I believe I started three or four weeks ago. I'm not quite sure of the date.
Q. Okay. Was it one date? Two dates? How many dates did you prepare?
A. Well, the deposition was originally scheduled, I believe, two weeks ago, and so I prepared for a few days before that. Perhaps, you know, some number of hours spread over a week. And then the -- with the reschedule, I then prepared again starting last week and a little bit over the weekend.
Q. Okay. And did you meet with your counsel?
A. I did have calls with -- video calls. Zoom calls.
Q. Okay. And you said you looked at the documents. What documents did you look at?
A. Well, I reread my report. I refreshed my memory on the patent. And I looked at some of the -- I refreshed my memory on some of the documents listed as the exhibits.

Q. Okay. Do you wish to change any of your opinions with regard to the '753 patent at this time?

A. No, I'm not aware of anything that I would change.

ATTORNEY FEDOWITZ: Okay, I'd like -- Sam, can you give Mr. Sturza Exhibit 1001 from the '753 file? That's the '753 patent. And can you also give him Exhibit 2020, which is his declaration?

(Exhibit No. 1001, previously marked, was referenced and indexed.) --

(Exhibit No. 2020, previously marked, was referenced and indexed.)

ATTORNEY HARROD: Yes, I'm handing you Exhibit 1001 from IPR2023-01212 and I'm handing you Exhibit 2020 from IPR2023-01212.

BY ATTORNEY FEDOWITZ:

Q. Okay. First I want to go through Exhibit 2020 with you, which is your declaration.

Do you recognize this document?

A. Yes. This appears to be my declaration with regards to '753.

Q. Okay. And flip through it and let me know if everything's there.

A. Yes, it appears to be complete.

Q. Okay. And on the last page, is that your

signature dated May 27, 2024?

A. Yes, it is.

Q. Okay. If you could turn to paragraphs 36 through 38, those are located on page 9.

A. Okay.

Q. Okay. This is under the heading Claim Construction.

Do you see that?

A. Yes, I do.

Q. And you have three paragraphs here where you state you've been informed about various things.

The first paragraph, 36 there, talks about -- and I'll paraphrase. You've been informed claims are to be construed from the perspective of a person of ordinary skill in the art.

And then the second sentence states that: I have been informed that a claim term is generally given the plain and ordinary meaning that a person of ordinary skill in the art would describe it when viewed in the context of the patent's claims, specification, and prosecution history.

Do you see that?

A. Yes, I do.

Q. Okay. And you've looked at the patent claims, the specification, and the prosecution history.

Is that correct?

A. Yes, that is correct.

Q. In paragraph 37, you talk about intrinsic evidence. I've heard you use that word a number of times today.

You say: I have been informed that the intrinsic evidence, including the patent claims, specification, and prosecution history, are the most important sources for interpreting claim language in a patent.

Do you see that?

A. Yes, I do.

Q. And do you still have that belief?

A. Yes, I do.

Q. And then the last sentence in that paragraph talks about: I have been informed that related patents and their prosecution histories may also be relevant to interpreting the claims of a -- claim terms in another patent. Right?

A. Yes.

Q. And then finally, in paragraph 38 you talk about something called a -- actually, let me go back to paragraph 37 here.

Paragraph 37 is focused on intrinsic evidence. Correct?

A. Yes.

Q. Is there any other intrinsic evidence that you're aware of? I'm just trying to understand, because you said it many times today, so I'm just -- I want to understand what you mean by intrinsic evidence.

A. Sure. So my understanding of the intrinsic evidence is the patent, related patents in the patent family, related provisional application in this case, the file histories associated with those patents, and in -- in this -- in this matter, there's some related patents that, you know, the district court in their claim construction order seems to be including in the intrinsic evidence.

So what I consider the intrinsic evidence here is the -- you know, all four of the patents, this one plus the three we've discussed earlier, plus the provisional, plus the file histories.

Q. Okay.

A. And there may have been one or two other related patents. I'd have to --

Q. Okay.

A. -- refresh my memory.

Q. And you reviewed these documents in preparation for your deposition?

A. I read all those documents in preparation for

1 preparing my report specifically for the -- you know,
2 preparing my declaration. I'm sorry, was that the
3 question or was the question with regard to deposition?
4 Q. I'm just trying to understand. Like, you
5 mentioned you -- you go through intrinsic evidence and
6 you state what it is here. I'm just trying to
7 understand your familiarity with these things.
8 A. Yes. So I've read through each of those
9 patents, the file histories, the provisional, all prior
10 to completing my declarations in this and the related
11 matter.
12 And then I refreshed my memory during
13 preparation for this deposition by rereading, you know,
14 my declarations and, you know, flipping through the
15 patents, you know, sort of skimming through them.
16 Q. Okay. And so you're prepared to talk about
17 the '753 in your declaration today. Is that --
18 A. Yes, sir.
19 Q. Okay. Let's move on to paragraph 38. There,
20 you talk about extrinsic evidence and you mention things
21 such as dictionary definitions, technical publications,
22 and things of this nature.
23 And you state at the third line from the end
24 of the paragraph: Extrinsic evidence is secondary to
25 intrinsic evidence and cannot be used to contradict the

1 meaning of claim language that's evident from the
2 intrinsic evidence.
3 Is that accurate?
4 A. Yes. That's --
5 Q. Okay.
6 A. You know, all these are things I've been
7 informed of by counsel.
8 Q. Okay. I'd like you to turn to paragraph 74.
9 It's on page 27. Let me know when you're there.
10 A. Okay.
11 Q. Just maybe about one-third of the way down in
12 paragraph 74, there's a sentence that starts with "For
13 the reasons I explain below."
14 Do you see that?
15 A. Yes, I do.
16 Q. And you call out two points. You say: For
17 the reasons I explain below, the construction of grid
18 point adopted by the district court in the related
19 litigation -- and then you have a parenthetical -- a
20 point associated with the representative calibration
21 data for an area and -- another parenthetical -- you
22 state: Requires that the claimed grid points, including
23 the boundaries of the area represent, be generated based
24 on evaluation of calibration data.
25 Am I reciting that correctly?

A. Yes, that is correct.

Q. And then you make a second statement in that paragraph. You say: Additionally, as I explain below further -- as I explain further below, the extrinsic -- intrinsic evidence would indicate to a POSITA that the term grid point as is used in the '753 patent includes a requirement that the grid point, including the boundaries of the area it represents, be generated based on evaluation of calibration data.

Do you see that?

A. Yes, I do.

Q. And just so the record's clear, and I'm not sure if it was stated earlier, what's a POSITA?

A. A person of ordinary skill in the art.

Q. Okay. If you could turn to paragraph 94.

A. Okay.

Q. So at the top of paragraph 94, the first sentence, go ahead and read that to yourself and then -- and let me know when you're ready.

A. Okay.

Q. The first sentence there talks about: The '753 patent explains that grid points are generated based on calibration data through evaluation of statistical similarities in the data that permits allocation of that -- of the data to different grid

1 points.
2 Then you refer to another portion of your
3 declaration, and then you cite to Exhibit 1001 at column
4 10, line 44 to column 6, line 6.
5 Do you see that?
6 A. Yes, I do.
7 Q. Okay. If you could pick up the '753 patent
8 again, it's Exhibit 101 [sic].
9 A. Got it.
10 Q. And if you could, I don't know if it's
11 double-sided or not, but if you could turn to column 10.
12 A. Okay, I'm there.
13 Q. And is it accurate that this Exhibit 1001
14 column 10, line 44 bridges to column 11, line 6, this is
15 what you're referring to as you state at the first
16 sentence of paragraph 94?
17 A. Well, let me just double-check. Yes.
18 Q. And I was just -- I was looking through this
19 and I was seeing that it says at the first sentence
20 there, it says: In any case -- in any of these cases,
21 sorry -- small print for me -- the NUG generator may
22 evaluate the data vectors.
23 And it goes through a whole series of things
24 right there, and then the same -- it goes -- it
25 continues on to column 11, line 6.

1 Is that correct?
2 A. Yes, through 11-6.
3 Q. Yeah. And is it correct that you were
4 referring to this because this talks about the NUG
5 generators and it goes through of all these type of
6 items?
7 A. Yes.
8 ATTORNEY McBRIDE: Objection. Form.
9 A. That -- I'm not sure I -- just to be clear, I
10 think what you're asking was does this talk about the
11 NUG generator.
12 BY ATTORNEY FEDOWITZ:
13 Q. Yeah.
14 A. And it does.
15 Q. Yeah, I was, because I was reading paragraph
16 94 of your declaration. You say: The '753 patent
17 explains that grid points are generated based on
18 calibration data. And then you talk of -- and then
19 there's this reference to column 10 through column 11
20 and it talks about NUG generators and how these are
21 generated.
22 Is that why you referred to it?
23 A. Yes. This is, you know, somewhat -- the '753
24 patent talks about the nonuniform grid points and
25 occasionally, you know, seems to conflate that with grid

1 point. There's not, you know, a clear distinction.
2 Q. Right. And the whole point is it's talking
3 about how you generate nonuniform grid points. That's
4 the -- that's why you referred to that. I'm just trying
5 to understand.
6 ATTORNEY McBRIDE: Object to form.
7 A. Yes, that, you know, in terms of the '753
8 patent, in various places it talks about NUGs and it
9 also talks about grid points and it uses them somewhat
10 interchangeably.
11 BY ATTORNEY FEDOWITZ:
12 Q. Yeah, it's -- it's not a trick question. I'm
13 just wondering. NUG generators, you referred to this
14 because this is talking about NUG generators.
15 A. Well, it's describing --
16 ATTORNEY McBRIDE: Object to the form.
17 A. It's -- it's not so much that it's talking
18 about NUG generation as it's talking about NUGs. And
19 that's what, you know, I was pointing out in 94, that
20 the, you know, '753 patent explains that grid points are
21 generated based on calibration data through evolution of
22 statistical similarities in the data that permits
23 allocation of the data to different grid points.
24 BY ATTORNEY FEDOWITZ:
25 Q. Okay. Okay, a moment ago you said the patent

mentioned NUGs in various different areas. I'd like you to go up and look at column 10, line 29 through 38. And here, it talks about a NUG generator, or a method to produce NUGs may begin the NUG generation operating using, for example, one or more of the following.

And then it has four items, A through D.

Do you see that?

A. Yes, I do.

Q. And in column 10, lines 29 through 38, it has A, and that states: A NUG generation may be from a fixed uniform grid point -- or, excuse me, a fixed uniform grid, a UG, defined over the region R with the calibration point data being assigned to the fixed grid point by some or all, for example, allocated by the closest fixed grid point, a centroid of a set fixed grid points.

Is that -- did I recite that correctly?

A. Yes. This is all with respect to a NUG generator or method to produce NUGs.

Q. And then B is: A random grid point to define the start of each NUG.

Is that -- did I recite that correctly?

A. Yes, you did.

Q. And then C is: Combinations of A and B depending on the characteristics of the calibration

1 data.
2 Did I recite that correctly?
3 A. Yes, you did.
4 Q. And then finally, it says: Or, D, some other
5 useful method.
6 Do you see that?
7 A. Yes, I do.
8 Q. And D is somewhat open language. Correct?
9 A. Yes, that's open-ended.
10 Q. And that would be inclusive of interpolation.
11 Correct?
12 ATTORNEY McBRIDE: Objection. Form.
13 A. Well, I've not really thought about or write
14 an opinion on what other useful methods might be. You
15 know, it's something I haven't thought about.
16 BY ATTORNEY FEDOWITZ:
17 Q. So is it accurate to say that you did not take
18 this into account in your declaration?
19 ATTORNEY McBRIDE: Objection. Form.
20 A. Well, I didn't, you know, provide any opinion
21 on methods to produce NUGs, so no, to my recollection, I
22 don't have anything in my declaration addressing
23 methods, you know, writing an opinion on methods to
24 produce NUGs.
25 BY ATTORNEY FEDOWITZ:

Q. Right. And so I'm not -- I just want to be clear. So when we talked about intrinsic evidence and these type of things, you did not take into account column 10, line 29 through 38. Correct?

ATTORNEY McBRIDE: Object to form.

A. Well, you know, to my recollection, I didn't provide any opinion as to what are methods to produce NUGs or what may not be methods to produce NUGs. I -- the -- you know, I can write an opinion as to what a NUG is, and I think that was the extent of my opinion with regard to the NUGs.

BY ATTORNEY FEDOWITZ:

Q. Well, I'm just -- I'm wondering if you took into account D, some other useful method. I'm just trying to understand, because in paragraph 95 of your declaration, you talk about Spain and interpolation. I'm just wondering if you took into account interpolation as it relates to some other useful method here. I mean, if you didn't, just -- just let me know.

ATTORNEY McBRIDE: Objection. Form.

A. Sure. You know, when I'm -- when Spain's talking about interpolating fingerprints, it's to fill in missing predetermined locations, you know, which is independent of any calibration data. And, you know, that's different than what we're talking about here,

1 which is methods for generating NUGs.
2 So I didn't -- you know, as I mentioned, I
3 don't believe I provided any opinion as to methods, you
4 know, for generating NUGs. What I've done is provided
5 an opinion as to what a NUG is.
6 BY ATTORNEY FEDOWITZ:
7 Q. So, Mr. -- is it Dr. Sturza or Mr. Sturza?
8 A. Mr. Sturza.
9 Q. I missed your education part of it.
10 A. Mr. Sturza.
11 Q. Okay. Mr. Sturza, let's go -- if you could
12 pick up Exhibit 2020, that's your declaration. If you
13 could just pick that up and go to paragraph 37 on page
14 9. And remember, that's the paragraph we talked about
15 intrinsic evidence, talking about the patent claims, the
16 specification and prosecution history.
17 A. Yes.
18 Q. Remember?
19 And you said you looked at that and that's --
20 you know, you've been informed that's what the intrinsic
21 evidence is. And, you know, I've been listening all
22 day. You said "intrinsic evidence" a lot of times.
23 And so my question's very simple. If we just
24 go back to column 10, line, you know, 29 through 38, I'm
25 just wondering if you took this section of the

specification into account in rendering your opinion in your declaration.

A. Well --

Q. It's a yes or no question.

ATTORNEY McBRIDE: Object to form.

A. I'm sorry, it's not a yes or no question. I didn't provide an opinion in my report for methods of producing NUGs. I provided an opinion as to what a NUG is. So, you know, I can't answer that question yes or no.

BY ATTORNEY FEDOWITZ:

Q. So I'm just going back to the -- paragraph 94. Here, you talk about grid points are generated based on calibration data through evaluation of statistical similarities in the data that permits allocation of the data to different grid points.

And then you cite to column 10, line 44 through column 11, line 6. And we talked about this already. You said the reason you referred to this is because it discusses NUG generators?

A. Uh-huh.

Q. And I'm just wondering, you know --

A. No, I -- I don't --

Q. Mr. Sturza, I'm trying to talk.

A. I don't --

Q. You're cutting me off. Would you please --
A. I think you've been cutting me off.
Q. Would you please let me speak?
ATTORNEY McBRIDE: Can we slow down, everybody, a little bit? I do agree with Mark. I was having trouble following where you were trying to go to, but --
ATTORNEY FEDOWITZ: So we already have it on the record that Mr. Sturza referred to column 10, lines 44 through column 11, line 6. He stated he -- that he referenced this because it refers to NUG generators.
BY ATTORNEY FEDOWITZ:
Q. And we're looking at column 10, lines 29 through 38. And my question is very simple.
Did you take into account column 10, lines 29 through 38 in rendering your declaration? Yes or no.
ATTORNEY McBRIDE: So, Mark, you don't have to answer this yes or no. Answer it how you need to.
A. So first, if I said with reference to column 10 that it was about NUG generators, I misspoke. And I believe I corrected myself, if I had said NUG generators, which I might have in response to one of your questions.
But I referred to it as methods to produce NUGs. And what I'm doing, attempting to do in paragraph

94 of my report is explaining characteristics of NUGs with reference to this section. And I'm not providing an opinion as to NUG generators or methods to generate NUGs.

So, having provided no opinions on that, I didn't take into account anything, you know, that I would have taken into account if I had provided an opinion.

BY ATTORNEY FEDOWITZ:

Q. So, Mr. Sturza, let's go back to paragraph 94, okay, of your declaration. If you read the first para -- first sentence there, it says: The '753 patent explains that grid points are generated based on calibration data through the -- through evaluation of statistical similarities in the data that permits allocation of the data to different grid points.

You see that?

A. Yes, I do.

Q. And then you cite to Exhibit 1001, column 10, lines 44 through column 11, line 6.

Do you see that?

A. I also cite to a couple of sections in my report.

Q. Right. But I'm focused on the intrinsic evidence, right? We talked about intrinsic evidence.

If we look at column 10, line 44, which you're citing to, that sentence states: In any of these cases, the NUG generator may evaluate the data vectors, and then it goes on to the rest of the paragraph.

Did you cite to this in error?

ATTORNEY McBRIDE: Objection. Form. Scope.

A. Well, I would look -- I would need to look at the referenced sections, because I suspect they may also contain references to the intrinsic evidence.

BY ATTORNEY FEDOWITZ:

Q. What are the reference sections that you're referring to?

A. Well, it seems to be 7 and 8, so the claim construction sections.

Q. Sure. Go ahead and review that and let me know when you find the support that you're referring to.

A. What I was referring to is the intrinsic evidence referenced in 94 in that first set of references includes those in sections 7 and 8, which are --

Q. Tell me where in 7 and 8. Tell me where -- why you referred to 7 and 8.

A. Because they're packed with intrinsic evidence related to the grid points being generated based on calibration data through evolution of statistical

similarities.

Q. Okay. So just one question. If you go to section 7 that starts on page 17, tell me where that supports your statement. Go ahead and take your time and read it. I have all day, and we have tomorrow too.

A. No problem. Okay, I got a chance to take a look at those sections.

Q. Okay. Let me know where -- where you want to start.

A. Well, you know, perhaps we can go back to, you know, what's your question?

Q. Sure.

My question is in the first sentence of paragraph 94, you talk about the '753 patent explains that grid points are generated based on calibration data through evaluation of statistical similarities in the data that permits allocation of the data to different grid points.

And then you cite to sections 7 and 8 of your declaration, which is extrinsic evidence, okay? And then you cite to the patent at column 10, line 44 to column 11, line 6.

My question to you is, did you or did you not take into account column 10, lines 29 through 38? I don't see it anywhere referenced in your -- in your

1 declaration.
2 A. No, it's -- I don't believe it is referenced
3 in my declaration because I don't think it was, you
4 know, relevant to the statement I'm making here that the
5 '753 patent explains that grid points are generated
6 based on calibration data through evaluation of
7 statistical similarities in the data that permit
8 allocation of the data to different grid points.
9 Q. So, Mr. Sturza, I'm wondering. You -- in
10 paragraph 94 you reference grid points, right? First
11 line of that paragraph?
12 A. Yes, I do.
13 Q. And in column 10, the first line of -- first
14 sentence at line 39 says a NUG generator. That's a
15 nonuniform grid point, right?
16 A. A nonuniform --
17 ATTORNEY McBRIDE: Object to the form.
18 A. A nonuniform grid generator or method, yes.
19 BY ATTORNEY FEDOWITZ:
20 Q. Right. And so are grid points -- are
21 nonuniform grid points grid points?
22 A. In the '753 patent, I find that in places,
23 they're used interchangeably, grid point and nonuniform
24 grid point.
25 Q. Okay. They're used interchangeably. Okay,

that's -- that's good to know.

And so if we look at column 10, lines 29 through 38, we also refer to NUGs, nonuniform grid points.

ATTORNEY McBRIDE: Objection. Form.

THE WITNESS: I'm sorry, 29 to --

BY ATTORNEY FEDOWITZ:

Q. To 38, yes.

A. Yes, it mentions nonuniform -- well, I'm not sure it says points. NUG --

Q. Or, excuse me.

A. Just --

Q. Nonuniform grid.

I mean, what is a NUG?

A. A nonuniform grid point.

Q. Okay.

A. I just -- yes.

Q. So just to be clear, in line 29, the NUG generator, or a method to produce NUGs, are those NUG generators -- is that the same as the NUG generator at line 38? Or 39. Excuse me.

ATTORNEY McBRIDE: Objection. Form.

A. Well, you know, it's -- they both say NUG generator.

BY ATTORNEY FEDOWITZ:

Q. Okay. So they're the same thing?
A. Well, you know, not something I provided an opinion on. But, you know, just looking at the text here, it talks about a NUG generator. In the next paragraph, it talks about the NUG generator. You know, seems -- seems to be both are talking about a NUG generator or method to produce NUGs.
Q. Right. All my question is is did you take column 10, line 29 through 38 into account in your declaration?
A. Not that I recall.
ATTORNEY FEDOWITZ: Okay. I agree with you. I don't think you did either. We can move on. Sam, can you give him Exhibit 1002? That's the prosecution history. And you can set that patent aside for the moment.
THE WITNESS: Right.
(Exhibit No. 1002, previously marked, was referenced and indexed.)
ATTORNEY HARROD: I'm handing you Exhibit 1002 --
THE WITNESS: Thank you.
ATTORNEY HARROD: -- in IPR2023-01212.
BY ATTORNEY FEDOWITZ:
Q. And, Mr. Sturza, if you could take a moment to

flip through this. I know it's a long document. I can represent to you to the best of my knowledge every single page is there, but if you want to take the time and count all 403 pages, you're welcome to do that.

A. I won't.

Q. I think it's silly --

A. Thank you. I'll take your word for it.

Q. Okay. And just to guide you through this document, it's -- it's in reverse order. So as you'll see, on the first page, it's page 1 and then the last page is 403, but it's in reverse chronologic order. So what we're going to do is we're going to start at the back.

A. Okay.

Q. And just real quick, if you could pick up your declaration, that would be Exhibit 2020 again.

A. Sure.

Q. And remember a moment ago we talked about paragraph 34?

A. Yes.

Q. Oh, maybe we -- we talked about paragraph 36 that mentions the prosecution history. Excuse me, 37. I'm sorry.

A. Oh, okay. 37, yes.

Q. Yeah. And prosecution history constitutes

1 intrinsic evidence. Correct?
2 A. Yes, that is correct.
3 Q. Okay. And if you flip to the -- page 8, you
4 talk about materials considered.
5 A. Yes.
6 Q. And here, you say -- I -- I'm just
7 paraphrasing. In forming my opinions regarding the '753
8 patent, I reviewed all the materials referenced in this
9 declaration and I reviewed all the exhibits filed to
10 date.
11 And tell me if I'm correct. If you go to the
12 front of your declaration at romanette ii through vi,
13 that's where the exhibits are referenced.
14 A. Yes, that's correct.
15 Q. And if you look all the way at -- on
16 romanette ii, you'll see Exhibit 1002. And that refers
17 to the prosecution history or file history that you have
18 in front of you.
19 Is that correct?
20 A. Yes, I believe this is that document.
21 Q. Okay. So is it accurate to say you -- you've
22 looked at this before? Correct?
23 A. Yes, that is correct.
24 Q. So, like I said, this is in reverse
25 chronologic order. I'm not sure why that is, but it is.

I think it's just how it got -- it was printed. I'd like to take you to page 304. It's going to be a lot of paper so we -- we'll take our time trying to get through this. But when you're at page 304, let me know.

A. I'm there.

Q. Okay. And I'd like you to pick up the patent again, which is Exhibit 1001, and I want you to turn to Claim 1. And let me know when you're there.

A. Okay.

Q. Okay. In the prosecution history, you'll see on page 304 Claim 1. It says "We claim," and then you'll see the typed-out Claim 1 with the limitations set forth there. And also in your other hand you'll see Claim 1 of the issued patent.

If you could, compare those two claims and let me know if there are any differences. I didn't see any but, you know, take your time and compare the words and let me know if there's any differences there.

A. They appear to be the same to me.

Q. Okay. And now if you could please turn in the prosecution history to page 314, which is Claim 32, and also turn to Claim 32 in the issued patent. And if you could, perform the same exercise and let me know if there's any difference between those claims.

A. They appear to be the same.

Q. Okay. And just to complete the record here, if you could turn to page 196.

A. 196.

Q. Yeah, 196.

A. Okay.

Q. Top left-hand corner, it says Utility Patent Application Transmittal. It's like a U.S. Patent and Trademark Office form. If you see on page 197, the top left-hand corner of that page says Fee Transmittal. And you can flip through some of the pages. And if you go all the way to page 202, let me know when you're there.

A. Okay.

Q. And there, it says -- it has a typewritten United States Patent Application, has the inventors and the title. And in the following pages, you can flip through. It's what we call the specification when a patent application is filed.

A. Okay.

Q. Let me know if that's accurate.

A. Yes, this appears to --

ATTORNEY McBRIDE: Objection. Form.

BY ATTORNEY FEDOWITZ:

Q. And then a moment ago we looked at page 304, and at the end of the specification are the -- the claims that you just looked at, Claim 1 and 32, right?

A. Correct.

Q. And following the claims, you have -- on page 324 through 395 are the figures.

A. Yes, I see those.

Q. All right, yeah.

And so I'll represent to you that this was the application that was filed with the US Patent and Trademark Office that ultimately matured into the '753 patent. Do you have any reason to doubt that?

A. No, I do not.

Q. Okay. And a moment ago, you looked at Claims 1 and 32 and compared those to the '753 patent and you did not find any difference.

Is that correct?

A. That's correct. I did not note any difference.

Q. Mr. Sturza, just real quick. It sounds like in hearing you today, you -- you're very familiar with patents and prosecution histories.

When I say words like "Office Action," does that mean anything to you?

A. Yes. I'm familiar. I believe Office Actions are something the Patent Office issues in response to applications.

ATTORNEY McBRIDE: I'm just going to put an

1 objection here. Obviously, Mr. Sturza is not a lawyer
2 or patent attorney so he's not here for his expertise on
3 filing procedures or patent law.
4 ATTORNEY FEDOWITZ: I'm not -- I'm not asking
5 for that. I just want to be clear on the record so he
6 understands what I'm talking about.
7 BY ATTORNEY FEDOWITZ:
8 Q. Mr. Sturza, can you turn to page 48 of the
9 prosecution history. And let me know when you're there.
10 A. Okay. I'm there.
11 Q. Just one second.
12 A. Sure.
13 Q. I had to shut the door.
14 Okay, at the top of page 48 you'll see the
15 letterhead of the United States Patent and Trademark
16 Office. You'll see on the top left-hand corner, it says
17 Application Number 12/026480.
18 Do you see that? It's small print.
19 A. Yes, I see that.
20 Q. And then on page 49, you see another form
21 document that says Office Action Summary in the top
22 left-hand corner.
23 Do you see that?
24 A. Yes, I do.
25 Q. Then it has a series of boxes and -- that are

1 checked. And, you know, it says disposition of the
2 claim sort of -- about halfway down, it has a series of
3 claim numbers.
4 And if you turn the page to page 50, you'll
5 see that it says at the top of the page Detailed Action
6 and Claim Rejections.
7 A. Uh-huh.
8 Q. I would like you to read pages 50 to 57. It's
9 seven pages. It's 12-point font, double spaced.
10 Shouldn't take that long. But can you tell me where --
11 if it -- where it says anything about the term
12 "evaluation"?
13 A. I see page 51D starts with "evaluating."
14 Q. Yeah, that's -- I think that's referring to --
15 it's -- that's referring to the claim.
16 ATTORNEY McBRIDE: Object to form.
17 THE WITNESS: I'm halfway through to page 5.
18 Was -- did you want me to go further?
19 BY ATTORNEY FEDOWITZ:
20 Q. Yeah. Go to page 9 at the top.
21 A. Okay.
22 Q. Yeah.
23 A. Okay, I'm through page 9.
24 Q. Okay. And the only reference -- I was asking
25 about evaluation, but the only reference to evaluating

was on page 3 where it references step D of the claim.
Is that correct?
A. That's --
ATTORNEY McBRIDE: Objection. Form.
THE WITNESS: That's --
ATTORNEY FEDOWITZ: Okay. Well, I'll just restate the question, as your lawyer said there's a problem with my question.
BY ATTORNEY FEDOWITZ:
Q. At the start of your review of this Office Action, I asked you to find the term "evaluation." You said there was the term "evaluating" in step D that references a step of the claim.
Is that the only reference to evaluating or evaluation that you found?
A. Yes, that -- that was the only one that I saw.
Q. Okay. Me too. I didn't see anything else also.
Mr. Sturza, if you could turn to page 40 at the bottom of the prosecution history, let me know when you're there.
A. I'm there.
Q. Okay. On page 40, you see that again it says in the United States Patent and Trademark Office, and it says Response. And it says at the top left-hand side

Serial Number 12/026480. And it says this is responsive to the Office Action mailed September 20, 2011, and the applicants submit the following remarks.

See that?

A. Yes, I do.

Q. And a moment ago, we looked at the Office Action from September 20, 2011. If you want to check that, that's on page 48, but -- or you can take my representation that that's what it is.

ATTORNEY McBRIDE: Objection. Form. Again, Mr. Sturza's not here to qualify as a patent examiner or patent attorney. He's here for his technical expertise.

A. So I see a filing date on page 48 of --

BY ATTORNEY FEDOWITZ:

Q. I'll direct you to it. If you look on the right-hand side at the top, you'll see some boxes?

A. Uh-huh.

Q. The -- the fourth box from the top says mail date.

A. Yes.

Q. And underneath mail date, it says 9/20/2011.

Do you see that?

A. Yes, I do.

Q. Okay. Now, if you go back to page 40, it says this is in response to the September -- to the Office

1 Action mailed September 20, 2011.
2 See that?
3 A. Yes, I see that.
4 Q. So they're responding to that Office Action we
5 just looked at. Do you have any reason to dispute that?
6 ATTORNEY McBRIDE: I'll just insert again that
7 Mr. Sturza's not a patent attorney.
8 BY ATTORNEY FEDOWITZ:
9 Q. It's not a trick question. It's --
10 A. Well, you know, I -- I see what it says.
11 Responsive for Office Action mailed September 20, 2011.
12 Q. Okay.
13 A. Yeah.
14 Q. I'll represent to you that this is a response
15 to that Office Action, which it is.
16 A. Okay.
17 Q. If you look at page 41 --
18 A. Uh-huh.
19 Q. -- through 45, I'd like you to review that.
20 It's relatively short. And see if there's any reference
21 to evaluation here.
22 A. Okay.
23 Q. Did you find any reference to evaluation here?
24 A. I didn't see one.
25 Q. Okay. If you could turn to page 12 of 403,

it's at the front of this document. Let me know when you're there.

A. Okay.

Q. On page 12, you'll see at the top left-hand side Notice of Allowability. And again, it's a -- it's a Patent Office government form with some boxes checked.

And if you turn to the next page, page 13, if you could please read page 13, there's -- and read page 14, for that matter, and let me know where it references anything about evaluation.

ATTORNEY McBRIDE: I'll put a running objection here, Matt. Either the word's there or not, but it doesn't really help us to go through and have him read every page of this to find the word.

ATTORNEY FEDOWITZ: I just want him to confirm that evaluation's not referenced in that.

THE WITNESS: I'm -- I'm not seeing it.

ATTORNEY FEDOWITZ: Okay. I didn't see it either.

BY ATTORNEY FEDOWITZ:

Q. Okay, so just to be clear for the record, Mr. Sturza, we looked at the claims that were filed with the US Patent and Trademark Office and we compared those to the '753 patent at issue. And you did not find any difference between those claims. Correct?

A. I did not note any.
Q. And we looked through an Office Action, a response to the Office Action, and a Notice of Allowability and we didn't find any reference but for a reference to a claim term that stated "evaluation."
Is that correct?
ATTORNEY McBRIDE: Objection. Form. Scope.
A. Yeah, I believe that's what we just did.
BY ATTORNEY FEDOWITZ:
Q. Yeah, that's what I just did. Okay, you can set that aside.
A. Okay.
ATTORNEY FEDOWITZ: Okay. Sorry, I just had to take a note. Sam, could you get out Exhibit 1028?
ATTORNEY HARROD: Okay, now I'm handing you Exhibit 1028 for IPR2023-01202.
(Exhibit No. 1028, previously marked, was referenced and indexed.)
BY ATTORNEY FEDOWITZ:
Q. Mr. Sturza, if you could flip through this. And while you're doing that, I'll represent to you that this is the claim Construction Opinion and Order from the Eastern District of Virginia. If you could flip through it and make sure all the pages are there and let me know if they are.

A. It appears to be the order, yes.

Q. Okay. And on the top left-hand side of the first page, it says Geoscope Technologies Private Limited as plaintiff versus Google LLC, defendant.

Do you see that?

A. Yes, I do.

Q. And is it accurate those are the same two parties that are involved in this Inter Partes Review?

A. That is my understanding.

Q. And, Dr. Sturza, or Mr. Sturza, this is Exhibit 1028. When we looked at your declaration, this is -- this is listed in the exhibits. And is it accurate that you reviewed this, sir?

A. Yes, I did review this.

Q. Okay. I'd like you to turn to page 2.

A. Okay.

Q. At the bottom of the page you'll see Roman numeral I that says Legal Standards, then you'll have subheading A, Claim Construction.

Do you see that?

A. Yes, I do.

Q. And at the bottom of that page you'll see the last paragraph that bridges onto the next page that says: When construing the claims, the Court first looks to and primarily relies on the intrinsic evidence.

Do you see that?

A. Yes, I do.

Q. And if you could read the rest of that paragraph bridging onto the next page, let me know when you're done.

A. Okay.

Q. In the first sentence on that last paragraph on page 2, the Court makes these statements that when it's -- when it's construing the claim terms, it first looks at the prior -- looks to and primarily relies on the intrinsic evidence.

And they state: The claims themselves, the specification, and the prosecution history of the patent.

Do you see that?

A. Yes, I do.

Q. And while the language is not identical, it's similar to the -- the phrase you use in your declaration, right?

ATTORNEY McBRIDE: Objection. Form.

A. Well, whatever was in my declaration is what I was informed by counsel, so not surprised that it would be similar.

BY ATTORNEY FEDOWITZ:

Q. So it is similar. Is that correct?

ATTORNEY McBRIDE: Objection. Form.
A. I can look at it.
BY ATTORNEY FEDOWITZ:
Q. You can look. Go ahead and look.
A. No, it's -- I mean, the printing -- yes, it looks similar.
Q. Okay. If you could go to page 18 of the claim construction decision, let me know when you're there.
A. Okay.
Q. And at the bottom of page 18 you'll see subheading number 2, Grid Point.
Do you see that?
A. Yes, I do.
Q. And if you flip the page, there's a box at the top that provides the plaintiff's construction and the defendant's construction.
See that?
A. Yes, I do.
Q. And, in fact, why don't you take a moment to review pages 18 through the top of page 20 just so we're all on the same page.
A. Okay.
Q. All right. If you go to page 19, in the middle of the page you'll see an indentation that says: Plaintiff argues that its proposed construction is near

definitional.

Do you see that?

A. Yes, I do.

Q. And then there's a block quote below that.

A. Yes.

Q. With -- the second half of it's italicized.

Do you see that?

A. Yes, I do.

Q. And in the Court's order below that, there's a line that starts with Exhibit E at the outset. The Court states: But the italicized language from which the plaintiff's construction is drawn is directed more towards what must be done to arrive at a grid point or set of grid points rather than what a grid point is.

Do you see that?

A. Yes, I do.

Q. Do you have any reason to disagree with that statement?

A. I'm not sure, you know, if there's any legal meaning. I see "must be done" is italicized, appears to be italicized. I don't know if there's any special meaning to that.

Q. I think it's just emphasizing.

A. I guess, you know, as an engineer -- I'm not an attorney, so when I read this, you know, all the way

1 through the end with the final construction, you know,
2 I'm not sure I understand what the Court means by
3 drawing the -- what -- what they're trying to say by
4 drawing this distinction, is construction -- the
5 plaintiff's construction is -- but the italicized
6 language of plaintiff's construction is drawn, is
7 directed -- but the italicized language from which
8 plaintiff's construction is drawn, okay, is directed
9 more towards what needs to be done to arrive at a grid
10 point or set of grid points than what a grid point is.
11 I'm not sure I understand the distinction there.
12 And then -- so, you know, the way I
13 understand, you know, what the Court's saying here is
14 the final construction is a point associated with
15 representative calibration data for an area, and that --
16 you know, and above that, it talks about -- towards the
17 end of the paragraph right above that box is that the
18 data points within an area are all statistically very
19 similar such that each of the grid points within the NUG
20 region can represent the overall NUG.
21 So again, I'm not -- it's not clear to me what
22 the Court is trying to say with that first sentence
23 starting XE, you know, after XE.
24 Q. So did you take that -- Mr. Sturza, did you
25 take this into account in preparing your declaration?

A. Yes, I did.

Q. And this is with the understanding that it's not clear to you what this statement that says but the italicized language from which plaintiff's construction is drawn is directed toward what must be done to arrive at the grid point or set of grid points rather than what a grid point is, it wasn't clear to you what the meaning of that was when you took this into account in your declaration?

Is that correct?

A. No, it --

ATTORNEY McBRIDE: Objection. Form.

A. What I was saying was I'm not clear what the Court's trying to say with that. I mean, I understand what it says. But, okay. It's -- it's sort of like, all right, that's interesting.

But, you know, I tried to, you know, address it in my report on page 28 where, you know, I pointed out that the district court construed grid point as a point associated with representative calibration data for an area. In its claim construction ruling, the district court explained what this construction means in the context of the '753 patent and other related patents that use the same term.

The district court explained that it used this

1 phrase in its construction of grid point to reflect the
2 defining characteristic of a NUG region and explained
3 that the specifications of the '753, '104, and '784
4 patent in that the data points within an area are all
5 statistically very similar such that each of the grid
6 points within the NUG region can represent the overall
7 NUG. Thus, the district court explained that the phrase
8 representative calibration data for an area in its
9 construction signifies that the calibration data
10 associated with grid point are statistically very
11 similar such that the calibration data are
12 representative of the area encompassed by the grid
13 point. The '753 patent's consistent with this in how it
14 describes the claimed grid point, explaining how grid
15 points are generated based on evaluation of whether
16 clusters of calibration data are statistically very
17 similar in identifying tests used to determine such
18 statistical similarity.
19 The, you know, district court's construction
20 makes clear that a grid point is not associated with
21 generic calibration data but rather is associated with
22 calibration data that is representative for an area.
23 This requires that the boundaries of the area
24 represented by a particular grid point be determined by
25 evaluating the calibration so that the subset of data

associated with the grid point is representative of the area. The '753 patent describes this as involving the evaluation of statistical similarities across the set of calibration data gathered within the region and teach examples of the statistical analysis used to generate the claimed grid points from the calibration data.

And you know, I -- I -- you know, I feel that I addressed that in my declaration.

Q. So, Dr. Sturza, if you could go back to the Claim Construction Opinion and Order on page 19.

A. Sure.

Q. I appreciate you reading your declaration, but there, it says -- after the block quote, it says -- and in the block quote, there is an italicized section, and it says: But the italicized language from which the plaintiff's construction is drawn is directed more toward what must be done to arrive at the grid point or set of grid points rather than what a grid point is.

I'm asking you, did -- do you understand what that means?

A. You know, I understand it to mean just what it says. The italicized language is -- is directed more towards what must be done to arrive at a grid point or set of grid points rather than what a grid point is. Okay.

Q. And do you have any reason to disagree with that statement from the Court?

ATTORNEY McBRIDE: Object to form.

A. Well, I think it, you know, explains what a grid point is. I -- I don't see the distinction with -- between "must be done" and "is."

BY ATTORNEY FEDOWITZ:

Q. So do you agree with this statement?

A. Well, I, you know, would -- I'm saying is that I don't understand or -- why the Court is making this point. I mean, it then goes on to talk about how the specification also describes NUGs as representing the signal characteristics or calibration data over a given region. And so, you know, that -- that last section right above the box, the final construction, it explained in the specifications of the '753, '104, and '748 [sic] patent is that the data points within an area are all statistically very similar such that each of the grid points within the NUG region can represent the overall NUG.

So I don't see anything inconsistent between what I'm saying and, you know, what the district court is saying in terms of their construction of, you know, of grid point.

Q. So let's go back to page 19, underneath the

block quote, the statement: But the italicized language from plaintiff's construction is drawn -- is directed more toward what must be done to arrive at a grid point or set of grid points rather than what a grid point is.

Do you agree with that statement?

A. I -- I think it, you know, does both. It defines the grid point and, you know, explains how to construct a grid point. I'm --

Q. Well, I'm just asking, do you agree with that statement?

A. Well, I don't see what the difference is between what must be done to arrive at a grid point or set of grid points, and what a grid point is. That's -- so I understand the district court is saying directed more toward, but I don't understand why that's important here.

Q. Okay. So do you -- is it -- so you're saying you don't understand the statement.

A. No. What I'm saying is I understand exactly what they're saying. They're -- they're saying is directed more towards what needs to be done to arrive at -- arrive at a grid point or set of grid points rather than what a grid point is. That -- I think that's very clear. I understand that statement.

I -- you know, "more towards" is -- is not,

1 you know, very deterministic. "More" is kind of
2 indefinite as to, you know, what does "more" mean? You
3 know, how much more? Is it a little more? A lot more?
4 So yes, I mean, it -- it does -- the
5 italicized language does describe -- you know, could be
6 used to describe how to, you know, arrive at a grid
7 point. It -- you know, also, you know, the totality of
8 that paragraph, you know, provides a definition for a
9 grid point.
10 Q. So, Dr. Sturza, I'm trying to understand.
11 Just help me. Like, do you agree with it? Do you
12 disagree with it? Or do you not understand it?
13 A. Sure.
14 ATTORNEY McBRIDE: Objection. Form.
15 A. What I was saying with regard to understanding
16 is I don't -- you know, as an engineer, I don't
17 understand the relevance of what "directed more towards
18 what must be done" is rather than "is." I -- reading
19 the entirety of what the district court said, I believe
20 that that's consistent with my construction that, you
21 know, I -- I do understand, you know, the words of the
22 statement. And, you know, I don't know, you know, what
23 "more" means in this context.
24 But, you know, it's -- it's directed towards
25 what must be done to arrive at a grid point. You know,

sure, it discusses -- it says the calibration data for these locations is gathered and analyzed so that particular grid points within geographic region can be determined and associated with a particular set or sets of calibration data, for example, one or more NNMRs.

So yes, I think that's a -- both a defining characteristic of a grid point, and it's also a way to construct grid points.

BY ATTORNEY FEDOWITZ:

Q. Okay. So just let me know. The statement on page 19 of the Claim Construction Order says: But the italicized language from which plaintiff's construction is drawn is directed more toward what must be done to arrive at a grid point or a set of grid points rather than what a grid point is.

Mr. Sturza, do you agree or disagree with this statement?

ATTORNEY McBRIDE: Objection. Form. Asked and answered.

A. You know, if -- I don't know if -- what's giving me trouble here is the "more." And, you know, I don't -- you know, as I said, you know, I look at that italicized language. What I see is part of a definition of a grid point, and I also see a -- a method or, you know, what must be done to construct a grid point.

BY ATTORNEY FEDOWITZ:

Q. Mr. Sturza, I'm just asking. Do you agree or disagree with the statement on page 19 of the Claim Construction Order that states: But the italicized language from which plaintiff's construction is drawn is directed more toward what must be done to arrive at a grid point or set of grid points rather than what a grid point is?

Do you agree or disagree with that statement?

ATTORNEY McBRIDE: Objection. Asked and answered multiple times.

A. Well, you know, again, you know, I could say that the, you know, the "more" there is what's causing concern, because when I look at the italicized language, I think it is doing both, you know, as it's both providing defining characteristic of a grid point and it's providing a method or an outline or, you know, what must be done to construct grid points.

And so I don't -- this is not the way I would say it, but I don't -- you know, I -- I just don't know what they mean by "more," since, you know, in my opinion, it does both.

BY ATTORNEY FEDOWITZ:

Q. So you disagree with the statement: But the italicized language from which plaintiff's construction

is drawn is directed more toward what must be done to arrive at a grid point or set of grid points rather than what a grid point is.

ATTORNEY McBRIDE: Objection.

BY ATTORNEY FEDOWITZ:

Q. Is that correct?

A. Again, it's -- you know, is it -- does "more" mean a little more or is it a little bit towards one way or the other? You know, I don't know. You know, in my opinion it, you know, does both. It provides a defining characteristic of a grid point and, you know, it provides a way of -- a method to construct a grid point.

Q. So I'm just trying to understand. It sounds like you're saying that it does both, but the district court says it does one. So is it correct that you disagree with this statement?

A. Well, that --

ATTORNEY McBRIDE: Objection. Form.

A. That's, you know, not how I'm reading what the district court's saying. They are not saying it just does one or it just does the other. They're saying "more." So is -- you know, if they said what you just said, which is that it just does one, then that's something I would disagree with. And if "more" means, you know, as I would understand "more" to mean that it's

1 doing some of both, then I would agree with that.
2 BY ATTORNEY FEDOWITZ:
3 Q. So, Mr. Sturza, is it -- is this statement on
4 page 19 of the Claim Construction Order that says: But
5 the italicized language from which plaintiff's
6 construction is drawn is directed more toward what must
7 be done to arrive at a grid point or a set of grid
8 points rather than what a grid point is, is that unclear
9 to you? Is that what you're saying?
10 A. What I'm saying is that in -- a couple of
11 questions ago, you appeared to be reading this "directed
12 more towards" as saying it was one or the other. And if
13 that's how "directed more towards" is to be understood,
14 then I would disagree with it. If "directed more
15 towards" means it's some of both, then I agree with it.
16 Q. Okay. Mr. Sturza, is it your understanding
17 that the statement on page 19 of the Claim Construction
18 Order that the statement saying: But the italicized
19 language from which plaintiff's construction is drawn is
20 directed more toward what must be done to arrive at a
21 grid point or set of grid points rather than what a grid
22 point is, you're saying it's both?
23 ATTORNEY McBRIDE: Objection. Asked and
24 answered.
25 A. What I'm saying is that, you know, in my

1 opinion, that italicized language goes both towards what
2 must be done to arrive at a grid point and the defining
3 characteristic of a grid point. And as long as "is
4 directed more towards" is read, as I think the plain and
5 ordinary meaning and English language of "more toward"
6 is that it's some of both, that, you know, I would agree
7 with that statement.
8 ATTORNEY FEDOWITZ: Sam -- you can set that
9 aside for a moment, Mr. Sturza. Can you get the
10 Institution Decision that's Paper 14?
11 ATTORNEY HARROD: Yes.
12 THE REPORTER: After this exhibit, we can take
13 a break.
14 ATTORNEY FEDOWITZ: Okay.
15 ATTORNEY HARROD: I'm handing you the
16 Institution Decision of the board in IPR2023-01212.
17 That's Paper 14.
18 THE WITNESS: Thank you.
19 (Paper 14 was referenced and indexed.)
20 BY ATTORNEY FEDOWITZ:
21 Q. Mr. Sturza, if you could take a moment to look
22 at that and let me know when you're ready.
23 A. Okay.
24 Q. So on the front page of this -- and -- and you
25 reviewed this once before, maybe multiple times.

Is that right?

A. Yes. This is the Institutional Decision.

Q. Okay. And if you look on the front page of that, you'll see, you know, see a paper styled as United States Patent and Trademark Office, Before the Patent and Trial Appeal Board. And in the middle of the page, it says Google LLC, petitioner, v. Geoscope Technologies Private Limited, patent owner.

See that?

A. Yes, I do.

Q. And it's correct that Geoscope is the patent owner of the '753 patent. Correct?

A. Yes, that's my understanding.

Q. Okay. If you could turn to page 22 of that document.

A. Okay.

Q. In the top one-third of that, it says -- has the heading B, Claim Construction.

Do you see that?

A. Yes, I do.

Q. And if you look at the -- towards the bottom of that page, you'll see a paragraph that bridges onto page 23. And I'll just read it into the record: The district court issued claim constructions in the Google action for all disputed terms of the '753 patent claims

at issue. That's Exhibit 1028. Petitioner uses the district court's construction for the terms calibration data, calibration points, grid points, Network Measurement Report, in the order of providing, generating, evaluating, and selecting the steps of Claim 1.

Do you see that?

A. Yes, I do.

Q. If you look at the next paragraph on page 23, it says: Patent owner does not dispute petitioner's statement on claim construction for the purposes of the preliminary response.

Do you see that?

A. Yes, I do.

Q. And then the next paragraph starts with the statement: For the purposes of this decision, we will use the district court's claim construction, which have been agreed to by all the parties at this juncture.

Do you see this?

A. Yes, I do.

Q. So is it accurate for me to say that both Geoscope and Google agreed on the claim constructions?

ATTORNEY McBRIDE: Objection. Form. Scope.

A. So, you know, not something, you know, I provided an opinion on. I understand this is a document

1 issued by the Patent Trial and Appeal Board. So, you
2 know, I -- presumably, this is, you know, what they're
3 saying. You know, I haven't made any, you know,
4 independent determination of any of this.
5 BY ATTORNEY FEDOWITZ:
6 Q. I'm not asking you to make an independent
7 determination. I'm just saying, do you disagree with
8 this statement from the US Patent and Trademark Office
9 Patent Appeal Board?
10 A. Well, I have no basis to agree or disagree.
11 There again, something that I haven't researched,
12 something I haven't opined upon.
13 Q. So, Mr. Sturza, the word -- the letters and
14 the language here is not clear to you on page 23?
15 The second full paragraph states: For the
16 purposes of this decision, we will use the district
17 court's claim constructions -- and I'll emphasize --
18 which have been agreed to by all the parties at this
19 juncture.
20 A. That's very clear. I understand that.
21 Q. And did you take that into account in
22 preparing your declaration?
23 A. I did, you know, review the Institutional
24 Decision, and I did take that into account, yes.
25 ATTORNEY McBRIDE: Matt, whenever's a good

time, can we have a break?

ATTORNEY FEDOWITZ: Just let me -- just one moment. Okay, we can take a break.

(Recess taken.)

BY ATTORNEY FEDOWITZ:

Q. Okay, Mr. Sturza, if you could pick up your declaration again.

A. Sure.

Q. It's Exhibit 2020.

A. Got it.

Q. Turn to page 35, paragraph 90. And if you could, read that paragraph and then let me know when you're ready to talk about it.

A. Okay.

Q. Okay. In paragraph 90, the first line, you say: For the reasons I explain below, and you say, it's my opinion that the challenged claims of the '753 patent are not valid under this ground. In particular, the prior art references in this ground fail to teach, and then you have a quotation, generating/generate one or more sets of grid points for said calibration, end quotes.

Do you see that?

A. Yes, I do.

Q. My first question is, is that supposed to say

"calibration data"?

A. Let me refer to the claims. So looks like calibration data in one, and then -- yes, it -- it appears that "data" is missing. Thank you --

Q. So that's --

A. -- for pointing it out.

Q. So that's a -- a typo. Is that correct?

A. Yes, that appears to be a typo.

Q. Okay. I'm just trying to understand what you're trying to say here, because it's not entirely clear to me.

At the top of -- of -- at the beginning of paragraph 90, you say: For the reasons I explain below, and then you talk -- have this paragraph. I'm trying to understand where you explain below that the prior art references in this ground fail to teach the quoted statement.

Where does it discuss that? Or where do you explain that?

A. Well, I think it's explained throughout starting like 92, 93, -4, -5, -6, -7, yes.

Q. So I'm wondering about -- just to be clear, I'm wondering about the quotation. Where does it -- where does it explain why the prior art references don't teach the quoted section? Because I don't see that

quoted section anywhere else, if you can help me understand.

A. Sure, let me try and do that. So at the top of page 36, Spain does not teach or suggest limitations regarding generating one or more sets of grid points. Okay. So Spain is all about fingerprint database, interpolating fingerprint database. But that's, you know, filling in for sample locations in 92. It's built -- taking fingerprint measurements at predetermined locations --

(Reporter clarification)

THE WITNESS: Paragraph 92 is built by taking fingerprint measurements at predetermined locations and using --

BY ATTORNEY FEDOWITZ:

Q. I -- I'm wondering about the quoted part. I'm not talking about that. I'm -- I'm -- where is -- where do you say that this does not teach that?

A. Well, starting at the top of page 36: In particular, Spain does not teach or suggest limitation in the challenged claims requiring generating/generate one or more sets of grid points for said calibration.

Q. So, but why? Like, I'm wondering. Trying to understand why, like --

A. Well, that's what I was explaining in

paragraphs 93 through -7 is why.

Q. Okay. Explain it to me, because it doesn't -- I don't understand.

A. Okay, so --

Q. Explain why it does not teach the quoted section. Don't read.

ATTORNEY McBRIDE: Objection. Form.

A. Well, so the claims require generating or generate one or more sets of grid points for said calibration. And Spain talks about, you know, fingerprint measurements at predefined locations and interpolating fingerprints at locations between sample locations, and that's not the grid points that are claimed in the '753 patent.

BY ATTORNEY FEDOWITZ:

Q. Why? Why not?

ATTORNEY McBRIDE: Object to form.

A. Well, the '753 patent, the claimed grid points are associated with representative calibration for an area whose boundaries are determined from evaluation of the calibration data.

BY ATTORNEY FEDOWITZ:

Q. I don't understand what you're talking about. Can you explain that? It doesn't make sense.

ATTORNEY McBRIDE: Objection. Form.

A. Well, so the claimed grid points in the '753 patent are different than the fingerprint database points of Spain. Spain is taking fingerprints at predetermined locations. Spain is filling in missing measurements using interpolation. And, you know, that's not grid points that are associated with representative calibration data for an area whose boundaries are determined from evaluation of the calibration data.

BY ATTORNEY FEDOWITZ:

Q. I'm not understanding that, Mr. Sturza. You -- you -- it sounds like what you're saying conflicts with the district court claim construction, and it's frankly just not making any sense. Can you -- can you please teach it to me so I understand it better?

ATTORNEY McBRIDE: Objection. Form.

A. Well, simple. You know, I think I did a really good job of laying it out in my declaration, and I'm -- I'm trying to understand what's not coming across this.

BY ATTORNEY FEDOWITZ:

Q. Well, in paragraph 90 here, you say: For the reasons I explain below, prior art references don't teach this quotation. And then there's just kind of empty statements that Spain doesn't teach it, but you don't say why.

A. Well --

ATTORNEY McBRIDE: Is there a question there? I'm sorry?

ATTORNEY FEDOWITZ: Yeah, I'm just trying to understand. He can explain it to me.

THE WITNESS: So --

ATTORNEY McBRIDE: I'm sorry, I think he has been explaining it. I'm not sure what the -- what the disconnect is. But go ahead.

A. The -- yeah, so what I'm laying out in 93 through 97 is what Spain is doing with his fingerprints and that he's taking fingerprints at fixed locations, he's interpolating for locations where he doesn't have fingerprints, and that that's not the same as the grid points in the '753 patent, because the -- because the grid points in the '753 patent are generated at least on calibration data through evaluation of statistical similarities.

BY ATTORNEY FEDOWITZ:

Q. So just, Dr. Sturza, can you pick up the district court Claim Construction? It's Exhibit 1028 that we looked at a little while ago.

A. Sure.

Q. And turn to page 20. And let me know when you're there.

A. I'm there.
Q. Okay. And this is the claim construction for grid points, right?
A. Yes.
Q. It says: A point associated with representative calibration data for an area.
Is that correct?
A. Yes.
Q. Where does that construction require evaluating?
A. I'm sorry, could -- I -- I lost part of that. Could you repeat it, please?
Q. Sure.
The district court construed grid point as a point associated with representative calibration data for an area. Correct?
A. Yes.
Q. Where does that construction require any type of evaluating?
ATTORNEY McBRIDE: Objection. Relevance.
A. I, you know, explained that earlier in my report when talking about claim construction.
BY ATTORNEY FEDOWITZ:
Q. I'm asking about the district court decision. Where does the construction from the district court

regarding grid point have any mention of evaluating?

A. Sure. So, you know, starting in paragraph 75 of my report through, I believe it's 80 -- actually through 88. So, you know, that's what I'm explaining in those 14 paragraphs in my report.

Q. Okay. I was asking about the district court Claim Construction. It's Exhibit 1028.

A. Yes.

Q. On page 20, there's a box that says Final Construction --

A. Yes.

Q. -- for grid point.

Do you see that?

A. Yes, I do.

Q. It says: A point associated with representative calibration data for an area.

A. Yes.

Q. Where is there any mention of evaluating there?

ATTORNEY McBRIDE: Objection. Form. Matt, this is -- I'm sorry, I'm having trouble following it all. This is construction for grid point, but you're asking about the term "evaluating"?

ATTORNEY FEDOWITZ: Yeah. I'm asking where does the final construction for grid point state

anything with regard to evaluating.

ATTORNEY McBRIDE: Well, those are two different claim terms, right?

ATTORNEY FEDOWITZ: All right. Okay, what was your name again? Mark?

ATTORNEY McBRIDE: No, it's Steve McBride.

ATTORNEY FEDOWITZ: Stephen, you don't need to have the speaking objections if you're trying to coach Mr. Sturza or what you're trying to do.

ATTORNEY McBRIDE: I'm just trying to figure out what your questions are. He doesn't know what they are.

ATTORNEY FEDOWITZ: Well, I'm not -- I'm not taking your deposition, I'm taking Mr. Sturza's deposition. And it's clear you're trying to coach him right now.

ATTORNEY McBRIDE: He doesn't understand what the question is. That's clear.

ATTORNEY FEDOWITZ: All right, cool it.

ATTORNEY McBRIDE: Is there a question pending?

BY ATTORNEY FEDOWITZ:

Q. Mr. Sturza, do I need to restate the question?

A. What is --

Q. It's an easy question. It's not a trick.

A. Okay.
Q. No trick questions, okay?
Pages 18 through 20 of the district court Claim Construction talks about grid point.
Is that correct?
A. Yes.
Q. And on page 20 of the district court Claim Construction there's a box that says Final Construction.
A. Yes.
Q. Correct?
A. Correct.
Q. And that's the final construction of "grid point." Correct?
A. That's correct.
Q. Okay. My question to you is, in this discussion on page -- starting on page 18 as it relates to the construction of grid point that goes all the way to page 20, is there any discussion of evaluation or evaluating? Please let me know where that is mentioned in the district court's Claim Construction.
ATTORNEY McBRIDE: Objection. Relevance.
A. Yeah, I -- I don't recall seeing that in those pages. I don't recall if the district court construed "evaluating" or "evaluation," but I don't recall it being in that section.

ATTORNEY FEDOWITZ: Okay. Yeah, I don't -- I don't think so either. I agree with you. Can we take a short break real quick?

ATTORNEY McBRIDE: Sure.

ATTORNEY FEDOWITZ: Two or three minutes.

ATTORNEY McBRIDE: Sure.

(Recess taken.)

ATTORNEY FEDOWITZ: Okay, I don't have anymore questions at this point in time. I don't know if -- Stephen, I don't know if you have any redirect.

ATTORNEY McBRIDE: Are you -- your questions are done? Yeah, I've got a short redirect. Just a couple questions for you.

EXAMINATION

BY ATTORNEY McBRIDE:

Q. I think you testified earlier that you reviewed the entire -- entirety of the '753 patent. Correct?

A. Yes, that is correct.

Q. Is the entire patent relevant to your analysis?

A. Well, you know, as I mentioned in my report, I, you know, only provided opinions with regard to certain claims. Claim 1, Claim 32, and I believe a couple of the dependent claims. And I provided opinions

on, you know, limited issues. So while I've read the '753 patent, not all of it was relevant to my report.

Q. Did you consider the entire '753 in preparing your report?

A. Yes, I did.

ATTORNEY McBRIDE: Thank you. That's all the questions I have.

ATTORNEY FEDOWITZ: Okay, I might have some re-redirect, so let's take another break for a moment. We can go off the record.

(Recess taken.)

EXAMINATION

BY ATTORNEY FEDOWITZ:

Q. Can you pick up Exhibit 2020, your declaration?

A. Yes, I have it.

Q. Okay. If you could please turn to page 9, paragraph 37.

A. Okay.

Q. And if you could please read paragraph 37 into the record.

A. Sure. I have been informed that intrinsic evidence, including the patent claims, specification, and prosecution history, are the most important sources for interpreting claim language in the patent. I have

1 been informed that related patents and their prosecution
2 histories may also be relevant to interpreting claim
3 terms in another patent.
4 Q. Okay. Mr. Sturza, is any of the -- are any of
5 those sentences in paragraph 37 inaccurate?
6 ATTORNEY McBRIDE: Objection. Form. Scope.
7 He's not a legal expert.
8 ATTORNEY FEDOWITZ: It's his declaration.
9 Stop coaching him, Mark. Mr. Sturza --
10 ATTORNEY McBRIDE: My name is Steve again,
11 Matt. But objection. He's not -- these are legal
12 opinions you're asking for. I'm entitled to --
13 ATTORNEY FEDOWITZ: Stop coaching him, Mark or
14 Steve or whatever your name is.
15 Mr. Sturza, I would like you to read paragraph
16 37 into the record without your attorney interrupting me
17 or you.
18 You can make your objection, and there shall
19 be no speaking objections; otherwise, we're going to go
20 to the board and we're going to have Mr. Sturza back
21 here for another deposition.
22 BY ATTORNEY FEDOWITZ:
23 Q. Mr. Sturza, can you please read paragraph 37
24 into the record.
25 A. I have been informed that intrinsic evidence,

1 including the patent claims, specification, and
2 prosecution history, are the most important sources for
3 interpreting claim language in a patent. I have been
4 informed that related patents and their prosecution
5 histories may also be relevant to interpreting claim
6 terms in another patent.
7 Q. Okay. Mr. Sturza, this paragraph 37 is part
8 of your declaration. Correct?
9 A. Yes, that's correct.
10 Q. Are any of those statements in paragraph 37
11 inaccurate?
12 ATTORNEY McBRIDE: Objection. Form. Scope.
13 Relevance. Calling for a legal opinion.
14 A. These are things I've been informed of so, you
15 know, I reflected here what I was informed by counsel.
16 And I don't -- you know, these are the standards that I
17 applied.
18 ATTORNEY FEDOWITZ: Okay, I don't have any
19 further questions at this time.
20 ATTORNEY McBRIDE: No further questions from
21 me.
22 ATTORNEY FEDOWITZ: And I'm leaving this
23 deposition open.
24 ATTORNEY McBRIDE: Oh, wait a second. I'm
25 going to object to leaving the deposition open.

ATTORNEY FEDOWITZ: No, we're leaving the deposition open. We have time.

ATTORNEY McBRIDE: I'm objecting to it.

ATTORNEY FEDOWITZ: You can object to it. We're leaving it open.

ATTORNEY McBRIDE: We can go off the record now.

THE REPORTER: Do counsel agree to go off the record? Sir, do you agree to go off the record?

ATTORNEY FEDOWITZ: Yeah.

(Deposition adjourned at 5:29 p.m.)

- REPORTER'S CERTIFICATE -

I, MARY ANN PAYONK, shorthand reporter and Notary Public, CA CSR No. 13431, do hereby certify that the witness whose deposition is hereinbefore set forth was sworn by agreement of all parties, that the proceedings were reported stenographically by me, and that this transcript is a true, correct, and full record of the testimony given.

I further certify that I am not related to any of the parties to this action by blood or by marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 30th day of August, 2024.

MARY ANN PAYONK, CSR #13431
Virginia Notary Registration No. 219251
My Commission expires 8/21/2026

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ERRATA SHEET FOR TRANSCRIPT OF: MARK ALAN STURZA

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DEPOSITION DATE: August 27, 2024

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I,

MARK ALAN STURZA,

state that I have read the foregoing deposition and declare under penalty of perjury:

That the foregoing is my deposition under oath;

That I have read same and have made the necessary corrections, additions or changes to my answers that I deem necessary;

That my answers as indicated are true and correct.

Executed at _____

this _____ day of _____, 2024.

_____

MARK ALAN STURZA

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