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Transcript of Christopher M. Schmandt

Date: May 9, 2024

Case: Meta Platforms, Inc. -v- AlmondNet, Inc., et al. (PTAB)

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

- - - - - x
META PLATFORMS, INC., :
Petitioner, :
v. : Civil Action No.
ALMONDNET, INC. and INTENT : IPR2023-01281
IQ, LLC, :
Patent Owner. :
- - - - - x

Deposition of CHRISTOPHER M. SCHMANDT
Conducted Virtually
Thursday, May 9, 2024
8:08 a.m. PST

Jobs No.: 537374
Pages: 1 - 21
Reported By: Rhonda Norberg, RPR
CSR No. 9265, CCRR No. 185

1 Videotaped Deposition of CHRISTOPHER M. SCHMANDT,
2 conducted virtually.

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9 Pursuant to notice, before Rhonda Norberg,
10 Certified Shorthand Reporter No. 9265, CCRR No. 185
11 in and for the State of California.
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A P P E A R A N C E S

ON BEHALF OF THE PETITIONER:

ANDREW MACE, ESQUIRE

COOLEY LLP

3175 Hanover Street

Palo Alto, California 94304

650.843.5808

ON BEHALF OF THE PATENT OWNER:

JAMES A. MILKEY, ESQUIRE

RUSS, AUGUST & KABAT

12424 Wilshire Boulevard

12th Floor

Los Angeles, California 90025

310.826.6991

ALSO PRESENT:

TOMAS REYES - Videoconference Technician

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I N D E X

WITNESS: CHRISTOPHER M. SCHMANDT

EXAMINATION

PAGE

BY MR. MILKEY

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EXHIBITS

(None)

1 P R O C E E D I N G S

2

3 CHRISTOPHER M. SCHMANDT,

4 being first duly sworn or affirmed to testify to

5 the truth, the whole truth, and nothing but the

6 truth, was examined and testified as follows:

7

8 EXAMINATION

9 BY MR. MILKEY:

10 Q Good morning, Mr. Schmandt.

11 You understand that you've submitted a -- a
12 declaration challenging the validity of the '878 patent
13 in this proceeding, correct?

14 A Yes, I do.

15 Q Okay. So do you have the -- the exhibits in
16 this case ready on your computer or are you going to be
17 downloading them from the chat today?

18 A No, I have them all in unmarked hard copy.

19 Q Okay. So I've uploaded Exhibit 1001 in this
20 case to the chat for the benefit of the court reporter,
21 but that is the '878 patent.

22 Could you turn to the '878 patent?

23 A Yes.

24 There's one correction to my declaration I want
25 to make at some point. You tell me when the right time

1 is.

2 Q Okay. Yeah, why don't we start with that.

3 A Okay. If you look at Paragraph 87, there is a
4 sentence in the third line that says "Under the proposed
5 combination involved device identifier." That's missing
6 the article "a."

7 Q Okay.

8 A It should be "a device identifier."

9 Q Any other corrections you'd like to make to
10 your declaration at this time?

11 A No, sir.

12 Q And for the benefit of the reporter as well, I
13 will upload your declaration, which is Exhibit --
14 Exhibit 1002 in this proceeding.

15 So if you could go to Claim 1 of the '878
16 patent.

17 A Yes. Okay.

18 Q Okay. And do you see limitation 1B starting on
19 Column 24, Line 44?

20 A Yes, I do.

21 Q Okay. And so the -- the limitation is fairly
22 long, but I want to focus in on the specific part of the
23 limitation that says "To determine that the two or more
24 internet-accessing electronic devices have separately
25 accessed the internet through a router of the LAN during

1 a predetermined period of time."

2 Do you see that?

3 A Yes, I do.

4 Q Okay. What is your understanding of -- of what
5 that -- that part of that limitation means?

6 A I'm not sure what you're asking. Could you be
7 more specific? I don't want to just read it back to
8 you.

9 Q Okay. So you understand that this requires
10 some determination, correct?

11 A Yes.

12 Q Okay. And so I guess I -- I think that you
13 have one of two interpretations of this limitation, and
14 I'm trying to understand what -- which -- which of the
15 two interpretations you have.

16 The first possible interpretation that you may
17 have is that this requires -- that the determination
18 itself has to happen during the predetermined period of
19 time.

20 The second possible interpretation is that the
21 determination has to be a determination as to whether or
22 not the internet accesses by the two electronic devices
23 occurred within a predetermined period of time.

24 Do you understand the distinction?

25 A I haven't really considered the former.

1 Q Okay. So you haven't considered which of those
2 two interpretations is correct?

3 A I haven't -- I haven't -- I would turn to my
4 declaration --

5 Q Okay.

6 A -- on that, and I probably have language in
7 there on it.

8 So on Paragraph 125, I discuss the phrase
9 "During a predetermined period of time," and I define
10 that as being the lease time for the -- the DHCP lease
11 time, so the period of time has to do with when the two
12 devices are connected rather than -- I think the first
13 of your two options was when -- the time at which the
14 determination was made, if I understood your question
15 correctly, and -- and that --

16 Q Okay.

17 A -- that's not a -- that's not a interpretation
18 I considered.

19 Q Okay. So, sorry. I -- I think the answer was
20 a little unclear for the transcript, so I'll just ask
21 specifically.

22 Do you believe that limitation 1B can be
23 satisfied so long as the determination happens during
24 the predetermined period of time?

25 MR. MACE: Object to form.

1 THE WITNESS: I'm not sure -- I'm not sure the
2 claim limitation stays that one way or another. I don't
3 think the limitation says when the determination is
4 made.

5 BY MR. MILKEY:

6 Q So is it your opinion that the -- the
7 limitation 1B requires that the system determines
8 whether or not the accesses by the -- the two electronic
9 devices occurred within a predetermined period of time?

10 A Yes.

11 Q Okay. Okay. So I know you have your -- your
12 declaration in this case, which is, again, Exhibit 1002;
13 and looking at the table of contents here, your Ground 1
14 is that certain claims of the patent -- of the '878
15 patent are obvious over Baig in view of Laidlaw,
16 Sitaraman, and Hahn.

17 Do you see that?

18 A Yes, I do.

19 Q Okay. So that's -- that's Baig combined with
20 three other references, and I'll preface this not -- not
21 to -- just by way of background, you know, reading your
22 declaration, you -- you have language like in the
23 system, things would happen a certain way.

24 I'm wondering what -- what actually you
25 believe, in your combination of references -- think Baig

1 would have needed to be modified; so specifically with
2 that background, my question is what modifications to
3 the Baig reference are you proposing for your Ground 1
4 combination?

5 A So we can find those.

6 So in the case of Laidlaw, it is the
7 session-managing aspects of the Laidlaw, which includes
8 sessions -- session tokens, a communicating those
9 session tokens by a -- a cookie, and being able to use
10 elements of a session table that is described in
11 Laidlaw -- Laidlaw and Laidlaw's language for managing
12 sessions based on the session table, specifically the
13 session token, which is a device identifier; but the
14 session table also stores DHCP addresses and timestamps,
15 which are what is required in Claim 1A, Parts 1, 2, and
16 3.

17 It also stores, obviously, the dynamic via
18 the -- it stores the IP addresses, but Baig also has the
19 IP addresses. The Sitaraman -- just to be clear,
20 another piece of the Laidlaw session table is timestamp;
21 so basically, Laidlaw's method of doing session
22 management with respect to the token, the cookie, and
23 the table, which are details that need to be fleshed out
24 from Baig.

25 Okay. So Baig from Sitaraman, and Sitaraman is

1 a disclosure of dynamic IP addresses. Baig does not
2 rule out dynamic IP addresses, but doesn't really have
3 any detail about dynamic IP addresses.

4 Really the aspect of Sitaraman that's
5 incorporated is that the IP addresses can be dynamic,
6 dynamic addresses or by DHCP. There's no real
7 particular part of Sitaraman other than Sitaraman
8 discloses how DHCP works.

9 And the third reference included is Hahn, and I
10 am relying on Hahn to disclose well-known web
11 techniques, HTML techniques for having information on a
12 web page update automatically specifically using
13 techniques called server pushing client pull.

14 Q Okay. That's helpful.

15 In terms of the -- the Sitaraman combination,
16 what actual modification to Baig's content server needs
17 to be made to accommodate the -- the combination of
18 Sitaraman?

19 Let me -- sorry. For the record, let me reask
20 that slightly more clearly.

21 In terms of your combination of -- of Baig with
22 Sitaraman, what actual modification to Baig's content
23 server are you proposing to accommodate dynamic IP
24 addresses?

25 A The content server needs to be aware of the

1 fact that dynamic IP addresses can change as a function
2 of DHCP lease expiring, although, in fact, I -- I'm not
3 sure it actually needs to know that in light of Laidlaw
4 session management.

5 So I think I would say -- I would say certainly
6 the Baig server, the VCSP server, needs to be able to
7 operate with addresses -- addresses that are dynamic
8 rather than static, but I don't actually think that
9 changes the logic of this server.

10 Q Okay. That's helpful.

11 A There are probably some -- some edge cases; but
12 basically the server's job is to detect connections from
13 the same address, and in a sense, that doesn't matter
14 whether those are static or dynamically assigned
15 addresses.

16 If they are dynamically assigned, they will
17 change at the frequency at which the DHCP lease expires;
18 hence, that's a predetermined time, but we don't
19 actually need to be running a clock to determine that.

20 Q Okay. Okay. If you could go to the '878
21 patent. Again, this is Exhibit 1001, and specifically
22 limitation D of Claim 1, which is on Column 24, starting
23 at Line 53.

24 A Okay. Yes, I'm there.

25 Q And do you see at Line 59 of that -- that

1 column, there is a reference to an automatic action?

2 A Yes.

3 Q Okay. In your report, what do you allege to be
4 the, quote, automatic action of claim limitation 1D?

5 Let me reask that slightly more clearly for the
6 record.

7 In your declaration, what do you allege to be
8 the, quote, automatic action, unquote, of claim
9 limitation 1D?

10 A The sending of the information that's in
11 panel -- box 606 in Figure 6, which is a list of other
12 users -- other users who are in the vicinity of that
13 access point and their genders.

14 Q Okay. And you mentioned Element 606.

15 Are you referring to Element 606 of -- of the
16 Baig reference?

17 A Yes, I am.

18 Q Okay. And just for the benefit of the
19 reporter, I will upload that into the chat.

20 That is Exhibit 1003, correct?

21 A I think so. I didn't number them.

22 Q Okay. Okay.

23 A Yes, it is. I can confirm that.

24 Q Okay. Other than the sending of the
25 information that's in box 606 in Figure 6 of the Baig

1 reference, do you identify anything else as constituting
2 the, quote, automatic action, unquote, of limitation 1D?

3 A Well, the automatic actions would basically
4 include other things that may be shown on that web page;
5 but for the sake of my analysis, all I have identified
6 is box 606.

7 I said "box." I should say "panel,"
8 "sub-window," something like that. It's not one of
9 those flowchart diagrams.

10 Q Okay. Okay. So I understand that automatic
11 actions can include sending other things; but you
12 understand that limitation 1D requires that the
13 automatic action meet specific requirements, for
14 example, that the automatic action be based off of user
15 profile information associated with the device
16 identifier of a first of the associated internet
17 accessing electronic devices, right?

18 A Yes.

19 Q Okay. So in your report -- again, I just want
20 this to be clear for the record.

21 What do you identify as being the claimed,
22 quote, automatic action, unquote, of limitation 1D?

23 A I believe what I said was that it's the
24 transmission of the contents of that panel in HTML into
25 the web page.

1 Q Do you identify anything else in your report as
2 being the claimed automatic action of limitation 1D?

3 MR. MACE: Object to form.

4 THE WITNESS: I have further discussion about
5 how it's automatic, so we should separate automatic from
6 action; but the action is -- all I've identified is the
7 information -- the information that's in that panel,
8 which includes deciding what to put in the panel,
9 obviously.

10 MR. MILKEY: Okay. Okay. In turning to your
11 Background 3 analysis in your declaration, this involves
12 a combination of your Ground 1 references further with
13 the Gerase reference. I may be pronouncing that
14 horribly incorrectly.

15 THE WITNESS: Your guess is as good as mine.

16 MR. MILKEY: And that starts on Page 133 of
17 your declaration.

18 Q Do you see that?

19 A I see that it starts on 133. I'm not there
20 yet.

21 Q Okay.

22 A Okay. I'm at 133. This is the just listing
23 the claims.

24 Q Yep.

25 So my -- my question is how do you -- so we --

1 we discussed what your modifications were for your
2 Ground 1 analysis previously.

3 How do you propose that that Ground 1 combined
4 system would be further modified in view of Gerase?

5 A So as I say in Paragraph 184, this is
6 specifically looking at the part of the -- the
7 limitation -- part of the -- part of the claim that says
8 "Based at least in part on at least a portion of the
9 user profile information associated with the device
10 identifier of the first device," so Baig discloses
11 advertising and profiling for the sake of advertising,
12 but Baig only considers or is -- is mute as to exactly
13 which of the devices is being consulted for this
14 information.

15 Gerase is a system of targeted advertising
16 where it can make inferences about ads appropriate for
17 one user based on other users' -- the demographics of
18 other users whom that user has associated with, and that
19 is the piece that needs to be incorporated in --
20 explicitly into Baig.

21 Q And just for the record, I'm uploading the
22 Gerase reference into the chat. That is Exhibit 1010.

23 A Do you want me to go there?

24 Q Yeah, that would be helpful.

25 So my question is how does Gerase determine

1 which users' profiles will be used to target
2 advertisements to the -- to a user who has an unknown
3 age or gender, for example?

4 A Well, I'm not quite sure what you're asking,
5 but I quote from Gerase at Paragraph 83. This profile
6 information is used to better target the known user with
7 advertisements. The system 100 deduces demographic
8 information, city, state, et cetera, from a user's IP
9 address, the type of article the user reads, search
10 queries he enters, and important shared behavior with
11 other users' behavior or activities in common with or
12 shared relationships to other users, assumes the age
13 given user-based ages of others user's activities, and
14 assumes a gender.

15 In the case of the combination with Baig, this
16 would be deducing this information from other users who
17 are currently or perhaps habitually found at the
18 physical location represented by the IP address of the
19 access point that all of those users connected to, i.e.
20 they would put into that web page.

21 Q When Gerase is referring to the users'
22 activities, what is it referring to?

23 A I don't think Gerase offers more details than
24 that as far as what the activities are. If you'd like
25 to point me to someplace in Gerase, I'll go there.

1 MR. MILKEY: Actually, I have no further
2 questions at this time.

3 MR. MACE: No questions from Petitioner; so
4 thank you very much, Mr. Schmandt, and we can go off the
5 record.

6 THE STENOGRAPHER: Mr. Mace, would you like a
7 copy?

8 MR. MACE: Yes.

9 (Off the record at 8:49 a.m. PST.)
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CERTIFICATE OF SHORTHAND REPORTER

I, RHONDA NORBERG, Certified Shorthand Reporter
within and for the State of California, do hereby
certify:

That CHRISTOPHER M. SCHMANDT, the witness whose
deposition is hereinbefore set forth, was duly sworn by
me before the commencement of such deposition and that
such deposition was taken before me remotely and is a
true record of the testimony given by such witness.

I further certify that the adverse party, META
PLATFORMS, was represented by counsel at the deposition.

I further certify that the deposition of
CHRISTOPHER M. SCHMANDT occurred virtually on Thursday,
May 9, 2024, commencing at 8:08 a.m. and ending at
8:49 a.m.

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

IN WITNESS WHEREOF, I have hereunto set my hand this
16th day of May, 2024.

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Rhonda Norberg

RHONDA NORBERG, RPR, CSR No. 9265,
CCRR No. 185

DECLARATION UNDER PENALTY OF PERJURY

Case Name: META PLATFORMS VS. ALMONDNET

Date of Deposition: May 9, 2024

I, CHRISTOPHER M. SCHMANDT, hereby certify
under penalty of perjury under the laws of the State of
_____ that the foregoing is true and
correct.

Executed this _____ day of
_____, 20____, at _____.

CHRISTOPHER M. SCHMANDT

Transcript of Christopher M. Schmandt
Conducted on May 9, 2024

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Transcript of Christopher M. Schmandt
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