

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

3 META PLATFORMS, INC., :
4 Plaintiff, : CASE NUMBER:
5 : IPR2023-01281
6 versus :
7 ALMONDNET, INC., and INTENT IQ, : U.S. Patent No.
8 LLC, : 10,715,878
: Patent Owner. :
9

10 DEPOSITION OF ERIK DE LA IGLESIA
11

12 12:14 p.m.

13 August 6, 2024

14 CONDUCTED REMOTELY
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11	E X H I B I T S
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1 (Tuesday, August 6, 2024 12:14 p.m.)

2 TECHNICIAN: Thank you to everyone for
3 attending this proceeding remotely, which we
4 anticipate will run smoothly. Please remember to
5 speak slowly and do your best not to talk over one
6 another. Please be aware that we are recording
7 this proceeding for backup purposes. Any
8 off-the-record discussions should be had away from
9 the computer. Please remember to mute your mic --
10 mute your mic for those conversations. Please have
11 your video enabled to help the reporter identify
12 who is speaking. If you are unable to connect with
13 video and are connecting via phone, please identify
14 yourself each time before speaking. We will
15 provide a complimentary unedited recording of this
16 deposition with a purchase of a transcript. I
17 apologize in advance for any technical-related
18 interruptions. Thank you.

19 ERIK DE LA IGLESIA,
20 called as a witness at the instance of the Petitioner,
21 being first duly sworn, was examined and deposed as
22 follows:

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EXAMINATION

BY MR. WEINSTEIN:

Q. Good morning, sir.

A. Good morning.

Q. Could you state your name for the record.

A. Eric De La Iglesia.

Q. And it's -- for the record, it's Mr. De La
Iglesia, not Dr., correct?

A. That's correct.

Q. Okay. And you've obviously been retained as a
witness for the patent owner in this proceeding,
correct?

A. Yes.

Q. Okay. Have you ever been deposed before, sir?

A. Yes, I have.

Q. Approximately how many times?

A. Thirty-something.

Q. Okay. So you're obviously aware of the rules
and conduct of a deposition, but I'll go over it just so
it's on the record.

This is a deposition, and you're under oath, so
everything you say here today has the same force and

1 effect as if it were stated, for example, in open court.

2 You understand that, correct?

3 A. It's understood.

4 Q. If you have any questions about what I'm asking,
5 feel free to ask for a clarification. I can provide
6 that.

7 Make sense?

8 A. Yes.

9 Q. And Mr. De La Iglesia, are you taking any
10 medication that could affect the testimony you're giving
11 here today?

12 A. No.

13 Q. And can you identify any reason you can't give
14 your best and most accurate testimony here today?

15 A. No reason.

16 Q. Okay. Thank you, sir.

17 During the deposition today we're going to be
18 referring primarily to the declaration you submitted in
19 this proceeding, which is Exhibit 2001, and I'm going to
20 be going through it mostly sequentially by paragraph
21 number. You have a copy of Exhibit 2001 available to
22 you, correct?

1 A. Yes. So just for -- for the record, I have in
2 front of me, printed and unmarked, my declaration and
3 Mr. Schmandt's declaration, and I have open on -- in an
4 Adobe pane Exhibit 1001, which is the '878 Patent, and
5 Exhibit 1003, Baig reference.

6 Q. Okay.

7 A. And when it -- when it's convenient, I have a --
8 I have a typo correction for my declaration.

9 Q. Okay. I think I know where it is, too, so we'll
10 cover that.

11 So during the deposition today, if at any point
12 in time I'm referring to a paragraph and you need to
13 look to other portions of your declaration to answer the
14 question, I'm just going to make that very clear, you're
15 free to do that. I know some expert -- some lawyers try
16 to confine you to the section that we're talking about,
17 but if you need to refer to other paragraphs of your
18 declaration to answer the question, I'm not going to
19 stop you from doing that.

20 Make sense?

21 A. Makes sense. I -- I will understand the
22 question in the context that you ask it, and I may refer

1 to my declaration and Mr. Schmandt's declaration in
2 answering those questions.

3 Q. Okay. Makes sense.

4 Okay. I'll start, first of all, with
5 Exhibit 2001. I'll go straight to something that I
6 think might be a typo. Want to just confirm that. If
7 you could turn, sir, to paragraph 59 of your
8 declaration, Exhibit 2001. And that's on page 22.

9 A. I'm there.

10 Q. In paragraph 59 it says -- I'll read the first
11 sentence in the record -- "Second, it's my opinion that
12 Baig's content server would have been able to determine
13 whether two devices accessed the internet via common
14 access point," and it goes on from there. Correct?

15 A. And that is the typo I wanted to identify.

16 Q. Okay. So -- so obviously there is the word
17 "not" missing from that paragraph, correct?

18 A. From the -- from the first "would." The -- the
19 beginning of that sentence should read, "Second, it is
20 my paragraph [sic] that Baig's content server would not
21 have been able to determine."

22 Q. That's -- that's why I'm asking, because I -- I

1 want to make sure I have your opinions clear rather than
2 take advantage of typos. So that's -- that's
3 appreciated.

4 Okay. So we can go back to the earlier part of
5 your declaration. A couple of administrative questions.
6 On -- on paragraph 4 of your declaration, Exhibit 2001,
7 you refer to the fact that you're billing your time at a
8 normal hourly consulting rate of 7- -- \$750. And as we
9 sit here today, that is still your rate; hasn't gone up,
10 right?

11 A. No, it has not gone up.

12 Q. Okay. How many hours do you estimate, if you
13 can, you have spent on this IPR matter? And by the IPR
14 matter, I'm excluding if you're doing any other work for
15 any of the other AlmondNet cases that may or may not be
16 pending.

17 A. Yeah. So that's a -- that's a little bit
18 difficult to answer simply because I -- I was, on -- on
19 other cases, also analyzing the '878 Patent, and so some
20 of that work, of course, is -- is relevant to my
21 background and understanding of the patent. If you're
22 referring to simply the work that was done on this

1 declaration after the -- the declaration of Mr.

2 Schmandt, I mean, somewhere between 20 and 40, I think,
3 would be a reasonable estimate.

4 Q. Okay. Okay.

5 A. And, of course, that -- that includes a
6 significant amount of sort of research and background on
7 -- on this patent and -- and, I think, these references,
8 as well, in -- in other cases also involving this
9 patent.

10 Q. Okay. Makes sense.

11 Okay. Sir, if we could turn to around paragraph
12 16. There is a section that begins "Legal Principles"
13 and it goes from paragraph 16 to paragraph 25.

14 A. Yes, I see that.

15 Q. Just basic question. You're a technical expert.
16 You don't have any legal training, correct?

17 A. I am -- I'm not offering any legal opinions. I
18 mean, certainly -- certainly I'm familiar with some of
19 these from having worked on cases before, but I'm not a
20 lawyer.

21 Q. Understood.

22 But your understanding of legal principles, that

1 was information provided to you by counsel, correct?

2 A. Well, it's -- I -- I generally ask counsel to
3 review and confirm my -- my understanding to an extent
4 it's not language explicitly provided by them that --
5 that I say that's consistent with my understanding. But
6 I'm -- when I say I understand here, I'm saying I
7 understand from counsel and, you know, as the nonlegal
8 person in the room.

9 Q. Okay. If we go to paragraph 26, sir, there is a
10 paragraph describing a person of ordinary skill in the
11 art for purposes of this patent. And -- and I
12 understand that -- that you have -- you have basically
13 chosen to adopt the formulation of a POSITA that Mr.
14 Schmandt has provided. Correct?

15 A. Yes. Last sentence of 26, yes.

16 Q. Okay. And then the patent here, the earliest
17 application for the '878 Patent was filed in April 2007.
18 As of that date, would you personally have qualified as
19 a person of ordinary skill in the art under the
20 formulation set forth in paragraph 26 of your
21 declaration?

22 A. Absolutely.

1 Q. Okay. If we go to paragraph 31. I'm referring
2 specifically to the second paragraph -- sorry -- second
3 sentence in paragraph 31. It says, "This process is
4 described by the '878 Patent," and it goes on from
5 there.

6 Do you see that?

7 A. I see where you're reading that.

8 Q. Yeah. And then sub-element 2 of your sentence
9 there says "an online site so that the system can
10 determine if," quote, "'the STB was connected to a modem
11 that was assigned to an IP address at a time and date
12 when the online site was accessed from that IP
13 address.'"

14 Do you see that?

15 A. I see where you're reading that.

16 Q. Yeah. And that -- that's quoting from the '878
17 Patent around column 16, line 12 through 48, correct?

18 A. Well, I -- I hope the citation is correct. I
19 did check them, but it is a -- it is a citation to the
20 patent as -- as described.

21 Q. And I'll represent that that text is in the --
22 in the range of the citation you provided there, which

1 is a broader citation than what you quoted, but it's --
2 it's -- it's in there.

3 You go on and talk about the term "predetermined
4 period of time." Now, as I understand your declaration,
5 you have not provided a construction of the term
6 "predetermined period of time." Correct?

7 A. Well, I -- I -- I understand that the term --
8 the term has not been construed for the -- for the
9 purposes of this investigation. The term would be
10 understood in its plain and ordinary meaning, of course,
11 in the context of the claim language in which it is
12 used.

13 Q. Of course. And.

14 Do you have an understanding of what the plain
15 and ordinary meaning of the term "predetermined period
16 of time" would be in the context of the claims of the --
17 of the '878 Patent?

18 A. Well, I think -- I mean, a predetermined period
19 of time means exactly what it says. It doesn't mean
20 anything else. In the -- in the context of the patent,
21 there is perhaps a little bit more color to add, and I
22 discuss that in my declaration. So let me -- let me try

1 to find that specific passage.

2 So I will -- I'm going to refer you to part of
3 my -- my discussion here. And I think I discuss this in
4 a few different places. But the particular -- the
5 particular predetermined period of time that's being
6 discussed in at least Claim 1 here is -- is a reference
7 to whether the accesses of the two devices occur within
8 a predetermined period of time. I think a POSITA would
9 not consider it to -- to describe the -- when the
10 determination is made.

11 Q. Okay. But let me break this down a little bit.
12 So the term "predetermined period of time," let's start
13 with the part "period of time." Does the period of time
14 have a start and an end?

15 MR. MILKEY: Objection to form.

16 THE WITNESS: I mean, which -- maybe --
17 maybe you can clarify that question a little bit.

18 BY MR. WEINSTEIN:

19 Q. Sure. If -- as you use -- as you see the term
20 "predetermined period of time" in the claims, focusing
21 on the words "period of time," does a period of time
22 have a start point in time and an end point in time?

1 A. Okay. I mean, it -- it sounds like -- it sounds
2 like you're asking me to construe a term that is -- that
3 is a -- we're saying is a -- it's, you know -- is
4 generally understood. A -- if -- if -- if you describe
5 a -- if you describe a period of time, that definition
6 is the -- is the context of the period of time.

7 Q. I get that. But what's a period in the term
8 "period of time"? I mean, I -- I understand that --
9 that the term hasn't been construed in -- in various
10 litigations and whatnot. I'm just trying to understand
11 your understanding, as a person of skill in the art, of
12 what the word "period" refers to. If I just say a date
13 and time, is that a period of time if it's just a single
14 point in time?

15 MR. MILKEY: Objection to form. Outside
16 the scope.

17 THE WITNESS: Again, it sounds like, you
18 know, the -- the -- the patent use of the claim
19 language "period of time," it doesn't use -- I -- I
20 forgot what exactly -- what terminology you -- you
21 used. Was it -- was it -- was it instant of time
22 or exact -- what -- I --

1 BY MR. WEINSTEIN:

2 Q. My -- my bigger question is just is -- when it
3 uses the term "period of time," does a period of time
4 have to have a start point in time and an end point in
5 time?

6 MR. MILKEY: Same objections.

7 THE WITNESS: I mean, a -- a period of
8 time simply has to -- has to define or describe a
9 period of time. It does not have to -- I'm not
10 sure what -- it sounds -- it sounds like you're ask
11 -- you're -- you're asking whether it means
12 something else, and I'm not sure it does.

13 BY MR. WEINSTEIN:

14 Q. No, sir. I'm asking you what the word "period"
15 means, your understanding of it in the context of this
16 patent. I've asked you several times -- look, we can
17 move on from this, but I've asked you several times what
18 is a predetermined period of time. You seem to be
19 unable to answer that question without using the word
20 "period" in -- in your answer. And I understand going
21 back to the claim language, but I need to understand
22 what you understand a period to mean, if you have an

1 understanding at all of it.

2 A. Okay. A period of time in this patent is a --
3 is an -- is an attribute or a -- a property of the
4 accesses of the devices that -- and which is a -- which
5 is a bas- -- which is a basis for an association.

6 Q. Okay. We'll go back to paragraph 31 of your
7 declaration. And on the bottom of page 11, there is a
8 sentence that says, "In this way, a POSITA would have
9 recognized that the CAS can determine that two different
10 internet-accessing electronic devices, such as an STB
11 and a laptop computer, separately access the internet
12 through a router of the LAN during a predetermined
13 period of time; i.e., the period of time that the STB
14 determines the IP address was assigned to STB, which is
15 determined by the CAS due to the STB's reporting of
16 information."

17 Do you see that?

18 A. I do.

19 Q. And that's referring to an embodiment that
20 you've quoted earlier on column 16, lines 12 through 48,
21 correct?

22 A. I -- I think the -- I think the -- the statement

1 is correct that that may be an exemplary citation, but I
2 think even in -- even understanding that -- that
3 specific citation in -- in the context here, 16, 12 to
4 48, I think it -- it is correct that a POSITA would have
5 recognized that the CAS, the content something, can
6 determine the two internet-accessing electronic devices,
7 separately access the internet through a router of the
8 LAN during a predetermined period of time. And just as
9 I described earlier, that predetermined period of time
10 is -- is a -- is sort of -- it's a -- it's an attribute
11 or aspect or -- or property of the -- of the determina-
12 -- that, you know, defines sort of how -- how that --
13 how that determination is done. But the -- but the
14 predeter- -- deter- -- determined period of time relates
15 to the -- relates to the accesses of those devices.

16 Q. No, I -- I -- I -- you said in that sentence
17 several times, and -- and I'll just ask one more time.
18 I understand what it pertains to in the claim. I'm not
19 going to ask you again. Does a predetermined period of
20 time have a start and end point?

21 MR. MILKEY: Objection to form. Outside
22 the scope.

1 THE WITNESS: Well, I mean, I'm -- I'm
2 considering -- I'm considering the term in the
3 context of the claim. And in -- in the claim, the
4 predetermined period of time is -- is an aspect
5 that the STB can -- can use to determine that the
6 IP address was assigned to -- to the STB and that
7 that was determined by the CAS due to the reporting
8 of the information. So --

9 BY MR. WEINSTEIN:

10 Q. All right.

11 A. -- it's -- it's a -- it's a -- it's -- it's
12 information that -- that -- that is used to make the
13 determination that these two devices accessed in -- in a
14 manner which allows the system to link their IPs.

15 Q. And to be clear, sir, I'm not asking you how
16 it's used. I'm asking you what it is.

17 Do you have an opinion one way or another as to
18 whether a predetermined period of time has a start and
19 end point?

20 MR. MILKEY: Same objections.

21 THE WITNESS: Sir, I -- I don't see start
22 and end point in the -- in the -- in the claim

1 language. So I -- you know, I'm -- I'm focusing on
2 what's in the claim language, not trying to, you
3 know, construe terms that have not been construed
4 by the Court. I'm not -- I understand that's
5 the -- you know, the Court does that.

6 BY MR. WEINSTEIN:

7 Q. If we go to -- but -- and so in applying the
8 term "predetermined period of time" to the claims of the
9 '878 Patent, you didn't assume that - either way that
10 the term "predetermined period of time" has a start and
11 end point, correct?

12 MR. MILKEY: Objection to form. Outside
13 the scope.

14 THE WITNESS: I'm not assuming that the
15 claim language of the '878 Patent is something
16 different than what it is.

17 BY MR. WEINSTEIN:

18 Q. That wasn't -- that wasn't my question.

19 So let's go to column 16 of the 1001 exhibit,
20 which is a copy of the '878 Patent. Maybe we can get it
21 that way. And I'm going to direct you to column 16,
22 line 12 through 48, which are the -- which is the

1 passage that's cited in paragraph 31 of your
2 declaration.

3 A. Okay. One -- one minute. You said column 6 --
4 column 16?

5 Q. Yes, sir.

6 A. Okay. One minute.

7 Okay. I'm at column 16. I -- I'll wait for
8 your question before I reread anything.

9 Q. No problem.

10 Okay. So -- so the first question is, you've
11 cited to column 16, line 12 through 48, in your
12 declaration. Are you contending that this passage of
13 the patent discloses an embodiment of the determining
14 step of Claim 1 of the '878 Patent?

15 MR. MILKEY: Objection to form.

16 THE WITNESS: I think whether -- whether
17 we're disclosing exactly what is happening in the
18 claims at stake is a separate question. Of course,
19 the specification is more general. I'm -- I can go
20 through 16, 12 to 48, and I think we can -- we can
21 pick apart some language here that's probably
22 relevant to that, if that's -- if that's your

1 question.

2 BY MR. WEINSTEIN:

3 Q. So -- so I'll go to the language that's cited in
4 paragraph 31. If you look at column 16, line 40,
5 there's a sentence that says, "The two lists, one from
6 the online site, one from the STB, of IP addresses are
7 compared, and delivery of a television advertisement is
8 requested if any matches are found; i.e., whether it's
9 found that the STB was connected to a modem that was
10 assigned an IP address at a time and date when the
11 online site was accessed from that IP address."

12 Do you see that?

13 A. I do. That's through line 45.

14 Q. Yeah. And I think that's -- that's the
15 particular language -- is what's cited or quoted in
16 paragraph 31 of your declaration.

17 So when it refers to "at a time and date when
18 the online site was accessed from that IP address" in
19 that passage we just read, is that an example of the
20 claimed predetermined period of time?

21 MR. MILKEY: Objection to form.

22 THE WITNESS: So, sir, I'm -- I'm a

1 little hesitant to say that any one -- any one
2 particular passage is the -- you know, is the only
3 thing that discloses something. I think there is
4 instructive language throughout this paragraph.
5 I'll point, for example, to -- so starting at line
6 17, you have, "the common IP address can be
7 periodically sampled and sampling stored" or -- at
8 -- at some suitable interval, "specific times and
9 dates of IP reassignments can" -- "can be stored,"
10 "periodically or at some other time interval report
11 to the" -- "to the CAS" -- these are -- I mean,
12 these are all aspects of understanding that
13 accesses of -- of two devices were from -- were
14 from a -- were from a common IP.

15 BY MR. WEINSTEIN:

16 Q. So going down to the example in line 43 -- or
17 44, I should say, "a modem was assigned an IP address at
18 a time and date when the online site was accessed from
19 the IP address," that's the language that was cited in
20 paragraph 31. Is that an example of a predetermined
21 period of time -- not saying it's limiting to that. I'm
22 saying is that an example of a predetermined period of

1 time for purposes of the '878 Patent?

2 MR. MILKEY: Object to form.

3 THE WITNESS: So I'm going to hesitate
4 that a specific sentence is -- is -- is in and of
5 itself -- you know, I -- I like to consider sort of
6 the -- the larger scope of the sentence in the
7 paragraph and within the specification.

8 What's being -- the -- the specific
9 sentence that you're pointing to is that it is --
10 it is found that the STB was connected to a
11 modem -- so that's our -- that's sort of our --
12 our -- the -- the embodiment where the STB is going
13 north to the -- to the modem and the modem has an
14 -- has an IP address. And it was connected to a
15 modem that was assigned an IP address at a time and
16 date when the online site was accessed from that IP
17 address. And that -- that cross-matching is part
18 of the process that is -- that is sort of
19 consistent with what is described in -- in Claim 1,
20 right, that make -- making a determination that at
21 -- that the access has occurred, of -- of the two
22 devices.

1 BY MR. WEINSTEIN:

2 Q. So if you go to the end of paragraph 31 of your
3 declaration, Exhibit 2001, on the top of page 12, the
4 phrase appears "separately access the Internet through a
5 router of the LAN during a predetermined period of time;
6 i.e., the period of time that the STB determines the IP
7 address was assigned to STB, which is determined by the
8 CAS due to the STB's reporting of information."

9 Do you see that?

10 A. I -- I see that.

11 Q. Okay. So what precisely is that period of time
12 you're referring to from the disclosures in column 16
13 that you're citing?

14 A. Okay. If we start reading from "the period of
15 time that the STB determines the IP address was assigned
16 to the STB, which is determined by the CAS due to the
17 STB's reporting of that information," the beginning of
18 paragraph -- of -- sorry -- column 16, line 12, talks
19 about reporting of the -- that the -- the CAS can be
20 configured to store the common IP address and
21 corresponding time and dates of each of the addresses
22 that is assigned to the modem. It talks about

1 periodically sampling and storing that information,
2 specific times. It talks about periodically or at some
3 suitable time -- time interval reporting that, so make
4 -- making that information available to the entity that
5 is going to make a determination. There's -- and then
6 the frequency and time periods of the online set
7 reporting can be similar to those of the STB. They can
8 also differ, but there are two lists, and you can make a
9 cross-matching assurance based on that. Whenever it is
10 found that the STB was connected to a modem, that was
11 assigned an IP address at a time and date when the ons-
12 -- when the online site was accessed from that IP
13 address.

14 Q. So how is it that the date and time that an
15 address is assigned to a modem -- how is that a period
16 of time, if at all?

17 MR. MILKEY: Objection to form.

18 THE WITNESS: I'm -- I'm -- wait. I'm
19 sorry. A -- are you -- are you referring to the --
20 to the -- to the assignment of the -- of the IP, as
21 in the -- as in the -- the DHCP lease, or are you
22 talking about the -- the reporting? I'm going to

1 need you to clarify.

2 BY MR. WEINSTEIN:

3 Q. Well, the reporting is only -- is reporting the
4 date and time of the -- of the address assignment,
5 correct?

6 A. Well, the reporting is reporting information
7 sufficient for the CAS to make a cross-match. I think
8 this is -- this is one example in -- in the
9 specification of -- of -- of this reporting. And
10 there's, of course, language here that, you know,
11 describes, you know, different frequencies and -- and
12 time periods or -- that -- that -- that differ
13 substantially. But to make -- to make a determination,
14 you are -- you are looking that there is -- that there
15 is cross-match, that these two devices accessed within
16 a -- within that time period.

17 Q. And if you could turn to column 12, line 56, of
18 the Exhibit 1001, the '878 Patent.

19 A. Okay. I'm at column 12. Roughly where?

20 Q. Column -- line 56.

21 A. Fifty-six. Okay. I'll get your question before
22 I reread.

1 Q. No problem.

2 So line 56 says, "As IP addresses are
3 dynamically assigned and reassigned, ISP/TBP 20 reports
4 online access and STB IP addresses to CAS 40, as in
5 figure 2."

6 Do you see that?

7 A. I do.

8 Q. Okay. Is -- is one way in which the
9 reassignment can occur in the '878 Patent using DHCP?

10 A. Okay. So I'm going to ask for some
11 clarification here because you're -- if memory serves,
12 the embodiment that we're discussing in this patent is
13 sort of what -- what's -- what's being described as -- I
14 believe it's column 13, line 4. Let me check -- let me
15 check my declaration.

16 Yes. As I note in my declaration, what we're
17 discussing -- the -- the -- the embodiment that is at
18 stake in this continuation, it starts at 13/4 and
19 involves figures 7 to 12. So -- and I -- and you are
20 pointing me to text in column 12. So I'm -- I'm not --
21 I want to make sure that we're -- we're -- you know,
22 that we're discussing the -- the portions that are

1 relevant to the claims at hand.

2 Q. Well, if we go back to column 16, the passage
3 that -- that you quoted in your declaration, it refers
4 to IP address reassignments.

5 My question was simple: In that embodiment of
6 the patent, can IP address reassignments occur using
7 DHCP?

8 A. I'm -- I'm sorry, what -- can you -- can you
9 point me to the reassignment in column 16?

10 Q. Yes, sir. Right around line 20.

11 A. Line 20, thank you.

12 Q. It says "or the specific times and dates of IP
13 address reassignments can be stored with the
14 corresponding IP addresses."

15 A. Yes. I see that.

16 And so this -- this is talking about the -- let
17 me -- let me make sure we're -- we're talking about --
18 that we're talking about the STB's IP address.

19 So in a -- in a system such as the embodiment
20 that we're -- that we're -- that's at stake here, so
21 13/4 onwards, the -- the -- the modem is going to obtain
22 an IP address. It could be -- it depends on

1 implementation how that IP address is assigned, and I
2 think options would include things like you could -- you
3 can hard coat it, you can -- let's see. In this time
4 frame, probably you would -- you could also BOOTP it.
5 And, of course, DHCP is -- is a protocol that could --
6 that can be used to -- to obtain an IP address.

7 Q. Okay. And then if you could turn, sir, to
8 column 4, line 7, of the patent. There is a description
9 of DHCP in there. And you would agree that DHCP is a
10 technology that predates the '878 Patent, correct?

11 A. I would say that the -- the use of DH at the --
12 at the time of the patent -- the use of DHCP made --
13 would make tracking or -- or making associations of
14 devices more -- more difficult and would therefore
15 necessitate the kind of inventions described in the '878
16 Patent.

17 Q. I understand that, but my question was a simpler
18 one.

19 You agree that THC- -- DHCP was a technology
20 that predated that patent, which, for the record, has an
21 earliest filing date of April 2007?

22 You are an expert on internet technologies in --

1 in April 2007, correct?

2 A. Yes.

3 Q. And you would agree that DHCP was a technology
4 that predated April 2007, correct?

5 A. I would -- I would certainly agree that the '878
6 Patent solutions are -- are -- are very well applied to
7 the -- to problems caused in an existing DHCP solution
8 and with the existing DHCP technology and common
9 configurations at the time.

10 Q. Now, let's go to line 37 of -- of column 4.
11 It's that same passage. It says "internet service
12 providers, ISPs, generally use DHCP to assign individual
13 IP addresses to subscribers."

14 And was that -- that was -- in your experience,
15 was that a well-known fact prior to the '878 Patent?

16 A. Yeah. The -- the -- the issue of tracking
17 devices that's described in the '878 Patent, which --
18 which solves this problem in DHCP, was -- the problem
19 was -- the problem was certainly manifest in -- in
20 people trying to -- to understand common devices at the
21 time. Of course, because DHCP will -- will mask the --
22 if it's applied to an -- to an access point, it will --

1 it will mask the inside network to the outside network.

2 Q. All right. Let's go to paragraph 60 of your
3 declaration, Exhibit 2001.

4 A. (Complying.)

5 Q. The paragraph 60 says, "A POSITA would
6 understand that DHCP lease periods for an access point
7 would have been determined by an internet service
8 provider." Let's stop there.

9 You agree with that statement, correct?

10 A. Well, yeah. To the extent that the internet
11 service provider is providing the DHCP service, they
12 would be -- they would be responsible for -- well, they
13 would be responsible for setting the lease times and
14 deciding whether to honor those lease times.

15 Q. Okay. And let's go back to column 1 of the '878
16 Patent. Let's start with line 35. In the background
17 section, there's a paragraph from column 1, line 35
18 through 44, that at least describes the term "internet
19 service provider."

20 Do you see that?

21 A. I do.

22 Q. Okay. And it says "internet service provider;

1 ISP, equivalently, an online access provider."

2 Do you see that?

3 A. I do.

4 Q. Online access provider was kind of a synonym of
5 internet service provider?

6 A. It could be. I would say that an -- an ISP --
7 an ISP was -- would have been understood as someone who
8 is providing access to the internet. An online access
9 provider could even be slightly more than that. So like
10 if I -- if I were offering, say, business DSL or a spe-
11 -- or like a point-to-point DSL link for like a
12 satellite office, that might -- in some cases I think an
13 online access provider could be slightly larger in terms
14 of, you know, the -- the locus of services that would be
15 provided.

16 Q. And --

17 A. In general -- in general, the expectation is
18 you're providing the ability to "www" something at a
19 browse and/or go to a website.

20 Q. Okay. Got it.

21 And then have you ever heard the term "online
22 service provider"? Is that also a synonym for ISP?

1 A. I don't know whether it's -- whether it's a
2 synonym, but it would -- it would be understood in the
3 same context.

4 Q. Okay. Now, internet service providers -- I
5 think you gave one example in your declaration of
6 Comcast. Is that an example of an ISP?

7 A. Well, Comcast would be an example of someone who
8 provides many services, some of which are ISP services,
9 some of which might be business connectivity, which
10 might be -- which might fall into the second group.

11 Q. Right.

12 A. Comcast now provides that. Of course, at the
13 time of the patent, of course, there's -- there's sort
14 of the fight between the DSL and the cable guys.

15 Q. Do internet service providers, based on your
16 expertise -- prior to 2007, they provided communication
17 services beyond just a raw connection to the internet,
18 correct?

19 MR. MILKEY: Objection to form.

20 THE WITNESS: Okay. You're -- you're
21 going to have to help me out here. What kind of
22 services are you talking about? And when you say

1 "raw connection," you know, I come from somewhat of
2 a security background, so let's be very specific
3 about what you mean there.

4 BY MR. WEINSTEIN:

5 Q. Well, let's -- let me use your example of
6 Comcast. In addition to providing a physical connection
7 to the Internet, Comcast also provided e-mail services,
8 correct?

9 A. Okay. I'm not sure whether they provided e-mail
10 services in that -- in that time frame. AT&T may have
11 on the DSL side. But there's a difference between a
12 connectivity service and a -- an application service.
13 You know, that -- if you have a Comcast account, that
14 account is not -- you know, if -- if you have an e-mail
15 at Comcast.net or Comcast.com, that's -- that's not
16 something that is tied to the specific modem or -- or --
17 or cable modem that's in your house, right. That's a --
18 that's a -- sort of a cloud-based element.

19 Q. Right. So it's an additional service provided
20 by Comcast, correct, in addition to the physical
21 connection that they may provide to their subscribers?

22 MR. MILKEY: Objection to form.

1 BY MR. WEINSTEIN:

2 Q. Isn't that right?

3 MR. MILKEY: Outside the scope of the
4 declaration.

5 THE WITNESS: I mean, again, it depends
6 where you are -- where you are scoping the term
7 "service," right? When we talk about, you know, an
8 -- an ISP or a connectivity service, we're talking
9 about connectivity or providing a gateway to the
10 internet, some -- some way to route packets onto
11 either -- you know, if -- if we're -- if we're
12 where I live, it's the MAE West -- it's the MAE
13 West backbone, so the L3 network. What does -- you
14 know, I -- I -- I don't think -- you know, e-mail
15 is not in that group of services. I think
16 that's -- that's -- that's a different thing.

17 BY MR. WEINSTEIN:

18 Q. Okay. Let me move to -- let me move to around
19 paragraph 38 of your declaration, Exhibit 2001.

20 A. Okay, I'm -- I'm at 38. I'll -- I'll wait for
21 your question.

22 Q. Okay. So paragraph 42, the second sentence

1 says, "But Baig does not place devices into
2 vicinity-based communication; rather, Baig places users
3 into vicinity-based communities, as shown by
4 Mr. Schmandt's citations to Baig, as well as my more
5 detailed review of Baig."

6 Do you see that?

7 A. I do.

8 Q. Now, the vicinity-based community in Baig is an
9 online service that you access through, for example, a
10 browser, correct?

11 A. Well, Baig is a -- Baig is an application,
12 right, that is -- that is accessed over the internet.
13 You know, you -- you may be mixing your services now
14 between what we originally talked about, which was, you
15 know, a connectivity service and, you know, whether or
16 not someone would call a -- it's on one of the -- it's
17 on one of the doc- -- the diagrams of Baig, what they
18 call their -- they called their website. But that's --
19 that's -- it's an application that's accessible over the
20 internet.

21 Q. Okay. So my question is about your distinction
22 between the users and the devices that you're making

1 around paragraph 42. My question, sir, is, when a user
2 accesses a vicinity-based community in Baig, they're
3 doing so using a device, correct?

4 A. I'm -- I'm not sure -- I'm not sure I get the
5 question. I mean, they're not -- they're not yelling
6 "www" out into the air, if that's -- if that's what you
7 mean.

8 Q. Thank you.

9 You would agree that in order to access the
10 vicinity-based communities in Baig, they have to be
11 using some kind of device in order to connect to the
12 community, correct?

13 A. Well, I mean, Baig -- Baig figure 1 shows some
14 of the -- some of the elements 102 that Baig uses for
15 the -- for the user to connect into Baig and for Baig to
16 understand the -- the -- the user's use of the system.
17 You know, that -- there's no -- there's no -- there's no
18 concept of the mechanism or the way in which the user is
19 accessing the internet within -- within the Baig system
20 itself. And I think that's -- you know, that's not just
21 a distinction I'm making. That's a distinction that --
22 that Baig is making.

1 Q. So if you look at paragraph -- paragraph 42 of
2 your declaration, one of the paragraphs you cite in Baig
3 is paragraph 56. And you're quoting paragraph 56 as
4 saying, "At step 306, the server 224 identifies all the
5 users who have logged in from a common hotspot as having
6 the same access point IP address."

7 Do you see that?

8 A. I see where you're reading them.

9 Q. So it's identifying the users based on the
10 access point IP address of their -- of the hotspot to
11 which their device is connected, correct?

12 A. I -- I think you're -- you're misreading my
13 citation a little bit. Baig identifies each user based
14 on that user's login, and exclusively based on that
15 user's login. Baig can then identify the users that
16 have logged -- that have logged in from a common hotspot
17 based on having the same -- having the same access point
18 IP. But Baig is identifying the user based on that
19 user's login information as -- as described throughout
20 the Baig reference.

21 Q. How is the log [sic] information conveyed from
22 the device to the server?

1 MR. MILKEY: Objection to form.

2 THE WITNESS: Well, I don't think the --
3 the device is -- is doing anything specific. It is
4 the user that is, through interaction with the -- a
5 web page, that is entering the information.
6 There's a -- one of the figures -- I think it's --
7 I'm sorry. I'm -- I'm on a Mac, so I'm going to
8 have to sort of look at this sideways, but figure
9 4, I think, shows how the user conveys their
10 username and password, if they have logged in
11 previously, or enters information as a new user.

12 BY MR. WEINSTEIN:

13 Q. Okay. So -- and since you went to Baig, if you
14 could turn to paragraph 0038 of Baig. And for the
15 record, that's Exhibit 1003.

16 A. Okay, one minute. And, sir, if you have the PDF
17 page number in Baig, that might help me get there
18 sooner.

19 Q. Yes, sir. It's 0022.

20 A. Okay. And we were on 38 or 39?

21 Q. Thirty-eight.

22 A. Thirty-eight. Got you. Okay. I'll wait for

1 your question.

2 Q. Thank you, sir. And, unfortunately, this
3 doesn't have line numbers, so -- so I'm going to be
4 referring to the second-to-last sentence in paragraph
5 38, which I'll read in the record. Says, "The VSCP
6 identifies a group of users at a wireless hotspot based
7 on their common public IP address and interconnects
8 them, thereby creating a vicinity-based user group."

9 Do you see that?

10 A. I -- I see that.

11 Q. The common IP address is something that is
12 transmitted when the user connects to the server,
13 correct? To the device.

14 A. The -- the user does not know the common IP
15 address.

16 Q. Exactly.

17 The device and the hotspot know the IP address,
18 correct?

19 MR. MILKEY: Objection to form.

20 THE WITNESS: The device does not know
21 the IP address either. A device is behind the net
22 boundary.

1 BY MR. WEINSTEIN:

2 Q. Right.

3 So the device -- the device has -- the device
4 doesn't have -- doesn't know the public IP address, it
5 knows the address within the local area network,
6 correct?

7 A. Okay. Sir, I think you're -- you're mixing up
8 what the -- what's being described in this para- --
9 paragraph with information that is not present on a
10 device and which the user does not have access to.

11 Q. Okay.

12 A. Okay. What this paragraph is saying is that the
13 -- the VSCP identifies a group of users at a wireless
14 hotspot based upon their common public IP address,
15 right, and that's the -- that is the IP address of the
16 public side of the -- of the NAT boundary at -- at the
17 -- at the site. And so when the users are -- when the
18 users are opening up their browser, the -- the IP
19 address that they have is -- is inside, right, and
20 that's -- they don't -- they don't know the outside.
21 That's -- that's specifically also described in the
22 figures of Baig. I think figure 1 makes that very

1 clear.

2 Q. Right.

3 And if you turn to figure 1 -- we might as well
4 just do that. Figure 1 has a line, like a dashed line
5 in the middle, and there's a wifi access point 106, and
6 it says "public IP 128.22.99.144." This is the common
7 IP address you're referring to, correct?

8 A. Well, that is the -- that will be the address
9 the IP -- the source IP address for all packets from
10 users within the -- you know, within the NAT boundary as
11 seen when they -- when they reach Baig's server, barring
12 additional NAT'ing further -- further along the -- the
13 route.

14 And that's -- the comment I was referring to
15 earlier is that the private network only sees this IP
16 address, meaning that the user only knows about the
17 internal address which -- which they have been provided.

18 Q. Okay.

19 A. And, generally, there -- there are spaces within
20 -- within IP that are considered not publicly routable.
21 So that's why, for instance, a 10 address or 172.16 or
22 192.168 would be addresses that you would use on the

1 inside of networks, and they won't -- they won't be
2 routed if they ever get to the internet.

3 Q. Okay. Sir, if you could turn to paragraph 50 of
4 your declaration, Exhibit 1001?

5 A. Okay, I'm -- I'm at 50.

6 Q. Thank you, sir.

7 You provide an analogy of a -- students with
8 college and being assigned to -- to dorm rooms.

9 Do you see that?

10 A. It is an analogy, I think, and this is the -- if
11 this is the one with the Social Security numbers. So
12 let -- let me get your question, but I'll probably have
13 to reread this one.

14 Q. No problem.

15 So my question was, what is -- in your analogy,
16 what is the Social Security number analogous to in the
17 Baig-Laidlaw combination?

18 MR. MILKEY: Objection to form.

19 THE WITNESS: So let me reread this real
20 quick. But I think you're -- what you're going to
21 find is that this analogy relates more to the
22 argument than to -- than to -- than Baig. One

1 minute.

2 Okay. The -- the purpose of this analogy
3 is to illustrate that for information to be used in
4 an association, it has to be used in the
5 association. It is not sufficient that the
6 information simply exist in a vacuum. And in
7 this -- in this example, you know, students can be
8 referenced in a -- in a number of ways, and I use
9 the example that certainly at some point a student
10 probably entered their Social Security number as
11 part of applying to the college and the -- and the
12 -- or university, and that college or university
13 probably has a record of their Social Security
14 number. But two students who are taking the same
15 class or who are in the same dorm are not
16 associated based on their Social Security number
17 simply because a Social Security number exists.
18 That's -- that -- that -- that is sort of a clear
19 problem in terms of the association.

20 BY MR. WEINSTEIN:

21 Q. Right.

22 But I guess my question was, in your analogy,

1 were you trying to analogize the Social Security number
2 to some piece of information in the Laid- --
3 Laidlaw-Baig combination that you contend isn't
4 associated with each other?

5 A. Okay. So when you -- when you speak about the
6 Baig-Laidlaw combination, let's make sure that we're --
7 that I'm addressing the -- Mr. Schmandt's specific
8 description of that combination. Can -- can you direct
9 me to the -- to the section of his -- of his
10 declaration?

11 Q. I can, but I'm referring specifically to the use
12 of an IP address as well as a session identifier cookie
13 in order to identify logged-in users.

14 But my -- my question really isn't about Mr.
15 Schmandt's opinions. It's more like, when you built
16 this analogy, were you just trying to, you know, make a
17 broader point or are you arguing that the Social
18 Security number, which is the key piece of information,
19 is equivalent or analogous to or serves the same purpose
20 of something in the prior art that you're saying isn't
21 being associated?

22 MR. MILKEY: Objection to form.

1 THE WITNESS: Again, we may have to go
2 back to Mr. Schmandt's specific -- specific mapping
3 and combination description. What I'm saying in
4 this paragraph is that if you are making an
5 association or you're determining an association
6 between something, it is not sufficient that the --
7 that something simply exist in the ether. You
8 actually have to show that there is a determination
9 of an association. And so to the extent that
10 Mr. Schmandt ma- -- attempts to -- attempts to show
11 determinations of associations where none exist, I
12 think this a -- this is an appropriate analogy to
13 show that, you know, determining an association has
14 meaning.

15 MR. WEINSTEIN: Could we take a
16 five-minute break? We've been going about an hour
17 plus.

18 MR. MILKEY: That works for us.

19 (Recess.)

20 MR. WEINSTEIN: Mr. De La Iglesia, I
21 actually don't have any more questions for you at
22 this time. And I wanted to thank you very much for

1 appearing for cross-examination deposition here
2 today.

3 THE WITNESS: Thank you. And thank you
4 to the Court Reporter and video team.

5 MR. MILKEY: I -- I do have just a very
6 quick line of questioning before we go off, and I'm
7 ready to do that now.

8 MR. WEINSTEIN: Okay. Go for it.

9 EXAMINATION

10 BY MR. MILKEY:

11 Q. So, Mr. De La Iglesia, do you recall being asked
12 about internet service providers like Comcast and AT&T
13 earlier today?

14 A. Yes, I do.

15 Q. Okay. As of the priority date of the '878
16 Patent, early 2007, approximately how many internet
17 service providers would you estimate existed in the
18 United States?

19 MR. WEINSTEIN: Object to form. Outside
20 the scope.

21 You can answer.

22 THE WITNESS: I would -- I would say

1 it's -- it's a large number, but it's -- it's
2 basically two numbers. You have -- you know, there
3 are obviously a great number that existed in the
4 United States. I'm not even sure -- you know,
5 probably well -- well into the thousands. But at a
6 specific -- within, say, a specific geographic
7 location, there -- you know, you could -- you could
8 be looking at dozens.

9 MR. MILKEY: Okay. I have no further
10 questions.

11 MR. WEINSTEIN: No -- no follow-up.
12 Thank you very much, doctor -- I'm sorry -- Mr. De
13 La Iglesia.

14 (The deposition was concluded at 1:30
15 p.m.)

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1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2 I, Susan DiFilippantonio, Reporter and
3 Notary Public within and for the State of Georgia,
4 do hereby certify;

5 That Erik de la Iglesia, in witness whose
6 deposition is hereinbefore set forth, was duly
7 sworn by me before the commencement of such
8 deposition and that such deposition was taken
9 before me and is a true record of the testimony
10 given by such witness.

11 I further certify that the adverse party,
12 Petitioner, was represented by counsel at the
13 deposition.

14 I further certify that the deposition of
15 Erik de la Iglesia occurred remotely via
16 videoconference, commencing at 12:14 p.m. to 1:30
17 p.m.

18 I further certify that I am not related
19 to any of the parties to this action by blood or
20 marriage, I am not employed by or an attorney to
21 any of the parties to this action, and that I am in
22 no way interested, financially or otherwise, in the

1 outcome of this matter.

2 IN WITNESS WHEREOF, I have hereunto set
3 my hand this 9th day of August 2024.

4 My commission expires:

5 November 22, 2025

6

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9

Susan DiFilippantonio

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11 NOTARY PUBLIC IN AND FOR THE

12 STATE OF GEORGIA

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Transcript of Erik de la Iglesia
Conducted on August 6, 2024

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