

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4
5
6 MOTOROLA SOLUTIONS, INC.,

7 Petitioner,

8 v.

9 STA GROUP, LLC,

10 Patent Owner.

11
12
13 CASE: IPR2023-01292

14 U.S. PATENT NO. 7,324,802

15
16
17 REMOTE DEPOSITION OF DAVID HILLIARD WILLIAMS

18 APPEARING REMOTELY FROM

19 EDWARDS, COLORADO

20 May 23, 2024

21
22
23
24 STA Group Exhibit 2005
25 Motorola Solutions Inc. v. STA Group LLC
IPR2023-01292
Page 1

1 REMOTE APPEARANCES:

2 ON BEHALF OF THE PETITIONER:

3 CLARKE STAVINOKHA, ESQ.
4 Baker Botts LLP
30 Rockefeller Plaza, 44th Floor
New York, New York 10112
5 Phone: 212-408-2500
Email: clarke.stavinoha@bakerbotts.com

6 and

7 ELIOT WILLIAMS, ESQ.
8 Baker Botts, LLP
1001 Page Mill Road, Suite 200
9 Palo Alto, California 94304
Phone: 650-739-7500
10 Email: eliot.williams@bakerbotts.com

11 and

12 KATHARINE BURKE, ESQ.
13 Baker Botts, LLP
700 K Street NW
Washington, DC 20001
14 Phone: 202-639-7700
Email: katharine.burke@bakerbotts.com

15
16 ON BEHALF OF THE PATENT OWNER:

17 KYLE KANTAREK, ESQ.
18 NOLAN HUBBARD, ESQ.
K&L Gates, LLP
70 West Madison Street, Suite 3300
19 Chicago, Illinois 60602
Phone: 312-807-4206
20 Email: kyle.kantarek@klgates.com
Email: nolan.hubbard@klgates.com

21
22 Also Present: Yuan Shi
Paul Bartusiak

1 PURSUANT TO WRITTEN NOTICE and the appropriate
2 rules of civil procedure, the remote deposition of
3 DAVID HILLIARD WILLIAMS, called for examination by the
4 Patent Owner, was taken remotely from Edwards, Colorado,
5 commencing at 9:03 a.m. MST, on May 23, 2024, before Deanna
6 Baysinger, appearing remotely from Jefferson County,
7 Colorado, a Notary Public and Registered Professional
8 Reporter in and for the State of Colorado.

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

I N D E X

EXAMINATION:	PAGE
By Mr. Kantarek	5

EXHIBITS:		PAGE
Exhibit 1	Declaration of David Hilliard Williams in Support of Petition For Inter Partes Review of U.S. Patent No. 9,445,251	31
Exhibit 2	Motorola Solutions' web page titled Dispatch Console Accessories	38
Exhibit 1001	United States Patent Jennings, Patent Number 7,324,802 B2, 1/29/08	13
Exhibit 1002	Declaration of David Hilliard Williams in Support of Petition For Inter Partes Review of Claims 1-21 of U.S. Patent No. 7,324,802 B2	8
Exhibit 1004	United States Patent Application Publication, Pub. No. 2004/0117859 A1, 6/17/04	42
Exhibit 1007	United States Patent, Nigawara, Patent Number 4,914,705, 4/3/90	112

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

P R O C E E D I N G S

DAVID HILLIARD WILLIAMS,
called as a witness, having been first duly sworn, was
examined and testified as follows:

EXAMINATION

BY MR. KANTAREK:

Q. Good morning, Mr. Williams.

A. Morning.

Q. My name is Kyle Kantarek. I will be asking
you questions today. You notice on the screen my
cocounsel Nolan Hubbard is on. I do like that the court
reporter mentioned the issues with virtual depositions
because I was going to cover that briefly as well.

I don't really feel the need to emphasize,
but we definitely don't want to be talking over each
other. So I will do my best to let you finish and you do
your best to let me finish, and maybe we can both insert a
little bit of a pause in there too just for an extra
buffer if that works for you?

A. It does. And I guess the good news is one
of the very few benefits of COVID is, you know,
experience with Zoom depositions. So hopefully, most of
those kinds of kinks have been, you know, minimized over
the last few years.

Q. All right. I totally agree with you.

1 Mr. Williams, you've been deposed a number
2 of times; correct?

3 A. Yes.

4 Q. So I will be brief, but I just want to give
5 a couple of ground rules. The first one we just talked
6 about. The next one is if you don't ask -- if you don't
7 follow up with me after I ask a question, I will assume
8 that you heard the question and understand the question.
9 Is that fair?

10 A. Fair.

11 Q. And is there any reason you can't give
12 truthful testimony today?

13 A. No.

14 Q. We will have breaks. I will try to prompt
15 for a break about every hour or so. Maybe then we can
16 discuss the timing. If you need one, of course, you can
17 always ask for one. I just ask that you don't ask for a
18 break while a question is pending.

19 Does that work for you?

20 A. Yes, it does.

21 Q. And as far as exhibits, I know I emailed
22 with counsel. Do you have paper versions of the premarked
23 exhibits or electronic?

24 A. I -- sorry, I did the talking over. I
25 have electronic versions of all the -- which I believe is

Page 6

1 all the exhibits, 1 through -- well, it's 29, then 2001
2 and then several others. And then I have paper copies of
3 my declaration and the patents and the prior art.

4 Q. Great. So you can feel free to use, you
5 know, like electronic or printed, however you want. Just
6 since it's remote and I can't really see what you are
7 looking at, just try to -- try to emphasize or let me
8 know, you know, what you are looking at or what spot or
9 what portion of it if it's important. Okay?

10 A. Okay.

11 Q. And also since this is remote, I just want
12 to ask: Is your computer screen -- you don't have any
13 chat messages open or anything like that?

14 A. No, I don't.

15 Q. Sorry. Aside from the chat message in the
16 Zoom meeting, of course.

17 A. No, I -- I do not. I don't use the chat
18 function.

19 Q. If you receive any sort of messages that
20 are relevant to the proceeding during it, you will let me
21 know about that; right?

22 A. Yes, I will.

23 Q. Okay. So I would like to talk a little bit
24 about your preparation for this deposition. Did you
25 prepare for this deposition?

1 A. Yes.

2 Q. How long did you spend preparing for this
3 deposition?

4 A. Several hours.

5 Q. When was that?

6 A. It's been scattered over the course of the
7 last several days.

8 Q. Who did you -- who did you work with in
9 preparing for this deposition?

10 A. Excuse me. Mr. Stavinocha as well as a
11 couple other attorneys at various points.

12 Q. Do you know the names of the other
13 attorneys?

14 A. Matt Thompson and Kate, and I forget
15 Kate's last name.

16 Q. So I would like to talk a little bit about
17 your work on your declaration. Your declaration is
18 Exhibit 1002 in this matter; is that right?

19 (Exhibit Number 1002 was marked.)

20 A. Correct.

21 Q. How -- how long would you say you spent
22 working on your declaration?

23 A. The original creation of it?

24 Q. Yes.

25 A. Is that what you're referring to?

1 I honestly don't remember because I think
2 it was last summer.

3 Q. You -- you recall working on your
4 declaration last summer, the summer of 2023?

5 A. Yeah. I think that the -- I signed it
6 like in -- towards the end of August, so... make sure I
7 got that right.

8 Q. So would you say that you spent more than
9 50 hours on it?

10 A. I would say something in that
11 neighborhood.

12 Q. Would you say more than 75?

13 A. I really don't remember.

14 Q. In the process, you were -- you wrote your
15 declaration in coordination with counsel; right?

16 A. Correct.

17 MR. STAVINOHA: Objection. Form.

18 And I will caution the witness not to
19 reveal the substance of any discussions with counsel.

20 Q. (By Mr. Kantarek) And when you -- strike
21 that.

22 When you worked on your declaration, you
23 were able to make any changes you want and updates as you
24 saw fit; correct?

25 MR. STAVINOHA: Objection. Form.

1 A. I -- yeah, I would say that's true.

2 Q. (By Mr. Kantarek) Are there any changes or
3 updates to the declaration you would like to make as we
4 sit here right now?

5 A. In rereviewing it, I noticed a number of
6 various typos. So probably if and as we get to that, I
7 will point them out if I recall them. I didn't take
8 notes for obvious reasons but...

9 Q. Typos aside, any substantive changes to the
10 opinions contained in your declaration?

11 A. No.

12 Q. Do you have any additional opinions
13 relevant to this proceeding that weren't -- that you
14 weren't able to include in your declaration?

15 A. I don't believe so.

16 Q. I just like to talk a little bit about your
17 work in, you know, the patent space and the IPR space.

18 How much work would you say you do for
19 Motorola?

20 A. I think this is the first set of matters.
21 There's another patent as you are aware of that has a
22 deposition next month. I think this is the first time
23 I've actually worked for them in a -- period.

24 Q. That was going to be my next question. So
25 you haven't worked -- this is the first time you worked

Page 10

1 with them at all, not simply as an expert witness in a
2 proceeding; right?

3 A. Yes. The -- the only caveat would be
4 in -- in -- from 1998 to 2000, I was at that point, an
5 associate partner in Accenture's communications and
6 high-tech strategy unit, and I led the development of
7 Nextel's location-based services strategy and IT and
8 network architecture to support that strategy.

9 Concurrent with that, Nextel was trying to
10 get GPS into their phones and Motorola was their core
11 vendor. So since GPS, as you would imagine, was an
12 integral part of the location-based services strategy,
13 there was a -- a mutual interest in each other's work.
14 But I didn't have any active work going on between myself
15 and my team and Motorola. I was just kind of tied in to
16 what they were doing or not doing.

17 So just in the interest of disclosure, I
18 thought I would point that out. But at no time have I
19 ever actually worked for or even, I would say, with
20 Motorola up to this project.

21 Q. So between 2001 and your retention in this
22 matter, you haven't done any work for Motorola -- work --
23 strike that.

24 So between 2001 and your retention in this
25 matter, you haven't worked with Motorola in any capacity;

1 right?

2 A. I think that's true. I -- I'm trying to
3 recall. I might have interviewed for a matter with them
4 a few years ago, but I didn't get it. But that's --
5 that's the only thing that is kind of nagging at my
6 brain.

7 Q. What about general IPR work? Do you tend
8 to work more for petitioners or patent owners in the IPR
9 space?

10 A. I would say more petitioners.

11 Q. How many ballpark IPRs have you been an
12 expert witness in?

13 A. A lot. I mean, it depends on how you kind
14 of quantify them. I think if you, like, search for me in
15 the patent database for the number of reports I've
16 submitted on IPRs, it's over a hundred. But, you know, a
17 lot of those are for kind of the same family-type stuff,
18 so...

19 Q. When you say "same family-type stuff," you
20 mean there will be a group of patents that may belong to
21 the same patent family and you might provide a declaration
22 for each of those patents; is that right?

23 A. Correct.

24 Q. I'd like for you to take out Exhibit 1001,
25 which is US Patent Number 7,324,802. And you can let me

1 know when you have that.

2 (Exhibit Number 1001 was marked.)

3 A. That one is not in the binder I got. I
4 printed it out elsewhere. Let's see. Can we go off the
5 record for a second while I find that?

6 Q. If you would like. I don't -- sure.

7 THE COURT REPORTER: We're off the record.

8 (Recess from 9:16 a.m. to 9:17 a.m.)

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

11 Q. (By Mr. Kantarek) So, Mr. Williams, you
12 have Exhibit 1001 in front of you; correct?

13 A. Yeah.

14 Q. And Exhibit 1001, as I mentioned, was
15 previously marked in this proceeding and it is US Patent
16 Number 7,324,802; right?

17 A. Correct.

18 Q. And you will understand if I call it the '
19 '802 patent, that this is what I'm referring to?

20 A. Yes.

21 Q. So the problem that the ' '802 patent seeks
22 to solve is -- sorry. Strike that.

23 Taking you to Column 1, starting at
24 Line 22, the paragraph starts with "This allocation."

25 A. Yes.

Page 13

1 Q. At Line 25, it talks about -- starting with
2 that, it says, "The receipt of multiple radio messages at
3 one time creates confusion for an operator who needs to
4 reply/act on each incoming radio message. To avoid this
5 confusion, the operator mutes all the channels except one
6 to securely follow one channel. This results in the
7 operator being able to follow the channel that is not a
8 muted channel while the message on the muted channel is
9 lost."

10 Do you see that?

11 A. Yes.

12 Q. That's the problem the '802 -- that's one
13 of the problems the ' '802 patent seeks to solve; is that
14 right?

15 MR. STAVINOH: Objection. Form.

16 A. I -- you kind of cut out there. Can you
17 repeat that question again?

18 Q. (By Mr. Kantarek) Sure. The --

19 A. I heard everything you said except for
20 like the last half of the sentence.

21 Q. The discussion at Column 1, Line 25 through
22 31, this describes a problem that the ' '802 patent seeks
23 to solve; is that right?

24 A. I think that's fair.

25 Q. And you see in Line 26, it talks about an

Page 14

1 operator?

2 A. Yes.

3 Q. In the context of the ' '802 patent, what
4 is an operator?

5 MR. STAVINOHA: Objection. Form.

6 A. I mean, the -- I'd have to go back through
7 the '802 to see all the uses of operator to -- to try and
8 accurately answer that question. In this particular
9 context, it's -- appears to be -- in the passage that you
10 just cited, it's talking about a -- well, an operator who
11 is receiving multiple messages and who needs to reply or
12 act on each one of those messages.

13 Q. (By Mr. Kantarek) So taking a little bit
14 of a step back. You are familiar with the ' '802 patent;
15 right?

16 A. Yeah.

17 Q. You've read the ' '802 patent front to
18 back?

19 A. Yeah, I would say that's fair.

20 Q. So I've directed you to that section
21 discussing a problem. I'm just asking if you can -- and I
22 appreciate you reading the section again. I'm just
23 wondering if you can tell me what an operator in the '
24 '802 patent is, in your own words?

25 MR. STAVINOHA: Objection. Form.

1 A. Well, again, in the -- it's the -- I would
2 want to see all the different uses of operator. I know
3 the operator is actually in at least one claim, for
4 example. And specifically how that term is being used in
5 this particular context, the passage that you just
6 described, it's -- it's a -- an operator receiving
7 multiple messages and with the underlying need to act or
8 rely or at least listen to each one of those.

9 Q. (By Mr. Kantarek) Well, in this passage,
10 an operator is receiving multiple radio messages at one
11 time at least; right?

12 A. In that -- in that first passage that you
13 read starting on Line 22, yeah.

14 Q. Let me take you to line -- Column 1,
15 Line 59. I'm sorry. Strike that.

16 Can I take you to Column 3, Line 59,
17 please, and you can let me know when you are there. It
18 should be on the next page.

19 A. Okay.

20 Q. At Line 59 starting with "dispatchers," it
21 says, "Dispatchers 104 are the operators who handle the
22 communication for the emergency teams and respond to
23 emergency messages received from a plurality of users
24 106."

25 Do you see that?

1 A. Yes.

2 Q. In your opinion, are dispatchers operators?

3 A. In this particular context, which is
4 discussing emergency communication systems, and the
5 context of the patent, it's saying straight out
6 dispatchers are the operators who handle the
7 communication for the emergency team.

8 Q. So in the context of emergency
9 communication systems, and the ' '802 patent, dispatchers
10 are operators who handle communications for an emergency
11 team?

12 MR. STAVINOHA: Objection. Form.

13 A. That's -- that's part of what this passage
14 of '802 describes.

15 Q. (By Mr. Kantarek) Do you agree with this
16 passage in '802?

17 A. It is what it is. I don't know that it's
18 a matter of agreeing or disagreeing. It certainly seems
19 straightforward.

20 Q. Sorry. I'm asking you if you agree with
21 the fact -- sorry, strike that.

22 So you just -- strike that.

23 You disagree that in the context of
24 emergency communication systems and the ' '802 patent,
25 dispatchers are operators who handle communications for an

Page 17

1 emergency team; right?

2 MR. STAVINOHA: Objection. Form.

3 A. Did you say disagree? I think you did.

4 It -- it states right here dispatchers are
5 the operators who handle the communication for the
6 emergency teams and respond to emergency messages.
7 There's nothing controversial about that statement, in my
8 opinion.

9 Q. (By Mr. Kantarek) So do you agree with
10 that statement?

11 MR. STAVINOHA: Objection. Form.

12 A. There's nothing about it that I disagree,
13 so I guess that means I agree. It's kind of an unusual
14 question. It's more of a statement versus an opinion.

15 Q. (By Mr. Kantarek) Sure. I mean, you're --
16 you're -- you have experience in the field of the ' '802
17 patent; correct?

18 A. Yes.

19 Q. I'm just trying to understand in your
20 experience if you -- if you agreed with that statement,
21 and it sounds like you did.

22 I'm just wondering if there are any
23 distinctions in your mind between an operator and a
24 dispatcher in the context of the ' '802 patent?

25 MR. STAVINOHA: Objection. Form.

Page 18

1 A. I -- I -- I didn't do a kind of a
2 cross-comparison across all the uses of operator
3 throughout the ' '802 patent versus all the uses of
4 dispatcher. So this particular passage where it's using
5 both terms, like I said, I -- there's nothing about it I
6 disagree with.

7 Q. (By Mr. Kantarek) So in your opinion, the
8 ' '802 patent equates dispatchers with operators?

9 MR. STAVINOHA: Objection. Form.

10 A. I couldn't answer that without doing the
11 analysis of what we've -- of the whole -- you know, use
12 of both terms throughout the entire patent to see if it's
13 exactly the same or one is the subset of the other or
14 there's certain conditions under which one is not part of
15 the other. I just -- I haven't done that analysis.

16 Q. (By Mr. Kantarek) So in rendering your
17 opinions on the ' '802 patent, you haven't analyzed
18 whether dispatchers are the same as operators?

19 A. I have done that as applicable to the
20 claims that use the term "operator," and to the extent
21 that I reference the dispatcher, a part of that within my
22 analysis, I just don't remember it off the top of my
23 head.

24 Q. So in rendering your opinions on the ' '802
25 patent, you have analyzed whether dispatchers are the same

1 as operators. You just can't remember it off the top of
2 your head?

3 MR. STAVINOHA: Objection. Form.

4 A. I believe that one of the claims or
5 possibly more uses the word "operator," and I believe as
6 part of my declaration, that in my analysis of that
7 dis -- the -- the concept and nature of a dispatcher was
8 utilized. I just don't remember the details.

9 Q. (By Mr. Kantarek) All right. Taking you
10 to Column 7, Line 18 of the ' '802 patent. You can let me
11 know when you are there.

12 A. I'm sorry. Column?

13 Q. Column 7, Line 18.

14 A. Okay.

15 Q. Starts with "The invention." It says, "The
16 invention can operate between any two processes or
17 entities including users, devices, functional systems, or
18 combinations of hardware and software."

19 Do you see that?

20 A. Yes.

21 Q. This passage says that entities include
22 users; right?

23 A. They -- to be precise it says, "processes
24 or entities can include users, devices," et cetera. I --
25 I don't -- but I would say your statement is essentially

Page 20

1 correct.

2 Q. Well, I guess to be precise, you added a
3 word "can" in there. So let me just ask it again.

4 This passage said that entities include
5 users; right?

6 A. I would say that's fair.

7 Q. So, all right. I'm sorry. Mr. Williams,
8 when I say "strike that," I'm just re-setting my question.
9 It doesn't really have anything to do with you, in this
10 context at least.

11 A. Yep.

12 Q. All right. I would like to -- you can keep
13 the ' '802 patent available. We're going to be using that
14 a good amount.

15 I would like you to take out your
16 declaration, which is Exhibit 1002. Let me know when you
17 have that. And let me direct you to Page 18 which is
18 Paragraph 31. And sorry, that's Page 18 at the bottom
19 middle, which is Page 32 on the footer.

20 A. You mean paragraph -- oh, I see. Yes.
21 Gotcha. There is also a Paragraph 32.

22 Q. Yeah. Yeah. Yes.

23 A. Yeah.

24 Q. I guess I did pick the most confusing page
25 to start with.

Page 21

1 So I would like to talk a little bit about
2 your obviousness opinion or your understanding of
3 obviousness. I don't know if I saw it in this section,
4 but you understand that in considering obviousness of a
5 patent prior art -- well, strike that.

6 What is your understanding of prior art in
7 an obviousness context?

8 MR. STAVINOH: Objection. Form.

9 A. Well, I -- I -- paragraphs -- well, the --
10 most of the section references prior art in some form.
11 So I -- I'm not an attorney so I am very reluctant to try
12 and paraphrase what is very explicitly here on the page.

13 Q. (By Mr. Kantarek) Sorry. I -- if -- let
14 me take you -- I will just take you to Paragraph 33 on the
15 next page. It says, "For example, I understand that two
16 or more prior art references, e.g., prior art articles,
17 patents, or publications," and then it goes on.

18 Do you see that?

19 A. Yes.

20 Q. I just want to make sure that when I say
21 prior art, you understand that I mean articles, patents,
22 or publications that petitioner -- that you and petitioner
23 have asserted render the claims of the ' '802 patent
24 obvious.

25 Is that your understanding as well?

Page 22

1 MR. STAVINOHA: Objection. Form.

2 A. That -- that -- that's fair.

3 Q. (By Mr. Kantarek) So turning -- so I
4 just -- strike that.

5 In the obviousness determination, you
6 understand that prior art as a whole must be considered
7 for all that it teaches; right?

8 A. Again, I'm not an attorney. I don't know
9 if the word -- how you phrased it including the term "as
10 a whole" is somehow -- has some legal ramifications. So
11 I'm not comfortable paraphrasing any part of this -- this
12 section.

13 Q. Sure. I'm not asking you to paraphrase.
14 I'm just trying to get your understanding of how you can
15 use prior art in an obviousness determination.

16 So in your declaration, you state that the
17 ' '802 patent claims are obvious for any number of
18 reasons; correct?

19 A. Yep.

20 Q. So in making that claim, do you understand
21 that prior art as a whole must be considered for all that
22 it teaches?

23 MR. STAVINOHA: Objection. Form.

24 A. I will make my same response. I -- "as a
25 whole," I don't know if that phrase is in this section of

Page 23

1 obviousness. And I don't know -- I'm not an attorney so
2 I don't know what the ramifications are specifically of
3 the -- the use of the term -- the phrase "as a whole."
4 So I -- I'm reluctant to paraphrase.

5 Q. (By Mr. Kantarek) So you are not sure
6 whether in an obvious determination prior art must be
7 considered as a whole?

8 MR. STAVINOHA: Objection. Form.

9 A. I -- my understanding of obvious is what
10 is in this section, which I'm happy to read. And I do
11 not think that "as a whole" was used in this section. It
12 has a lot of other detail in it, which add up to that,
13 but I'm just not -- I'm not an attorney.

14 Q. (By Mr. Kantarek) I just briefly want to
15 take a quick step back. We're getting stuck on this "as a
16 whole" term.

17 I mean -- let me just phrase my question a
18 little bit differently to make sure it's not an issue with
19 phrasing. One single -- so my question is: In the
20 obviousness determination when considering a single piece
21 of prior art as part of an obviousness opinion, is it your
22 understanding that you can pick and choose different
23 portions of it? Or is it your understanding that the
24 prior art as a whole must be -- the piece of prior art as
25 a whole must be considered?

1 MR. STAVINOHA: Objection. Form.

2 A. I -- I repeat the same statement. The
3 phrase "pick and choose," I mean, you are -- obviously
4 not every part of every piece of prior art is cited in an
5 obviousness discussion. So whether you characterize that
6 as pick and choose, I -- I don't know. But, you know,
7 I'm pretty sure it's not a legal term either.

8 And I know that, in general, there's all
9 sorts of different case law about, you know, prior art
10 and under the circumstances under which it can be
11 included and obviousness arguments and how. And that is
12 stated here and that's what I -- I -- what is stated here
13 is the extent to which I am comfortable stating any sort
14 of legal opinion because I am not a lawyer.

15 Q. (By Mr. Kantarek) So what is stated in
16 Section B, which -- of Exhibit 1002 which covers
17 Paragraphs 31 through 39 is the extent of your
18 understanding of obviousness.

19 Is that what you're saying?

20 MR. STAVINOHA: Objection. Form.

21 A. That -- that forms the basis of
22 obviousness that I utilize within this declaration.
23 There are -- I believe there's also various -- various
24 places, references to various case law that are intended
25 to essentially prompt -- reminder back to this section

Page 25

1 about different aspects of obviousness, but -- but this
2 Section 31 through 39 forms my basis for the obviousness
3 analysis from a legal perspective.

4 Q. (By Mr. Kantarek) So if Paragraphs 31
5 through 39 of Exhibit 1002 don't state that prior art as a
6 whole must be considered in an obviousness determination,
7 that doesn't form the basis for your obviousness analysis?

8 MR. STAVINOHA: Objection. Form.

9 A. I don't understand that question.

10 Q. (By Mr. Kantarek) I will just ask it
11 again. And so if Paragraphs 31 through 39 of Exhibit 1002
12 don't state that prior art as a whole must be considered
13 in an obviousness determination, that means it's not part
14 of the basis of your obviousness analysis; right?

15 MR. STAVINOHA: Objection. Form.

16 A. No, I wouldn't necessarily agree with
17 that. What -- you know, as a whole, again, I don't know
18 if it as a legal term. It certainly seems like a
19 subjective term, but it may have a legal -- a specific
20 legal meaning and the details that are contained within
21 Paragraphs 31 to 39 may very well add up to that in a
22 legal sense. I don't know. I just don't think that
23 particular term "as a whole" is utilized in this set of
24 paragraphs.

25 Q. (By Mr. Kantarek) Okay. So -- I'm not

1 trying to find out whether that -- those terms are used in
2 this paragraph. I'm trying to find out if when you
3 analyzed the prior art that -- or the alleged prior art
4 that you include in your declaration, I'm trying to
5 understand if you took that -- took the teachings of
6 that -- of each piece of prior art as a whole or not.

7 MR. STAVINOHAN: Objection. Form.

8 A. I don't know how to answer that any more
9 than I have already done. I mean, I guess that maybe
10 opened a sticking point.

11 I didn't -- in reviewing the prior art, I
12 reviewed the -- the entire piece of prior art and cited
13 as appropriate the sections that I thought were
14 appropriate. I didn't, like, do a word search and
15 exclude the first ten pages so I could focus on
16 Paragraph 52 on Column 10 and not read anything else. I
17 looked at the entire patent.

18 Q. (By Mr. Kantarek) So you said you've been
19 involved in a large number of IPRs where you've submitted
20 declarations; correct?

21 A. That's fair.

22 Q. And on these declarations -- strike that.
23 And all of these IPR declarations -- sorry.
24 Strike that.

25 How many of these IPR declarations would

Page 27

1 you say included an understanding of obviousness, if you
2 know?

3 MR. STAVINOHHA: Objection. Relevance.
4 Outside the scope.

5 MR. KANTAREK: Mr. Stavinotha, let's not do
6 speaking objections. It's not part of this proceeding.
7 So I -- I mean, you've been saying form and that's fine,
8 but let's keep it to form because you are not supposed to
9 do speaking objections, but --

10 MR. STAVINOHHA: Respectfully, Counsel, you
11 are not supposed to go outside the scope of his
12 declaration. I'm not sure that there's anything improper
13 about an outside the scope objection.

14 MR. KANTAREK: You objected to relevance.

15 MR. STAVINOHHA: Yeah. And if you check
16 the trial practice guide, objection to relevance is a
17 proper objection.

18 MR. KANTAREK: Is -- okay. It just seems
19 like you layered relevance and scope as a speaking
20 objection. So I think you just stick to objection in IPR
21 proceedings.

22 MR. STAVINOHHA: I respectfully disagree.

23 MR. KANTAREK: Okay. We can check that.

24 Q. (By Mr. Kantarek) So, Mr. Williams, did --
25 here. So when -- in doing an obviousness analysis -- in

1 doing the obviousness analysis here -- strike that.

2 Are you aware if the PTAB, which is the
3 patent trial and appeal board, has ever found your
4 opinions lacking in an institution decision?

5 MR. STAVINOHA: Objection. Relevance.
6 Outside the scope.

7 A. Not to my knowledge.

8 Q. (By Mr. Kantarek) So if -- if the PTAB has
9 ever found your opinions improperly pick and choose
10 teachings from a reference, you don't know about that?

11 A. Correct.

12 Q. If the PTAB has ever found your opinions
13 failed to represent accurately what a reference fairly
14 suggests to a skilled artisan, you wouldn't know anything
15 about that?

16 MR. STAVINOHA: Objection. Relevance
17 outside the scope.

18 A. I would not know. I don't know.

19 Q. (By Mr. Kantarek) When you submit expert
20 declarations in IPR proceedings, you -- strike that.

21 Are there any IPR proceedings you have done
22 that you recall involved any Motorola documents?

23 MR. STAVINOHA: Objection. Relevance.

24 A. Well, certainly none that I can recall
25 specifically. And I'm trying to even be able to answer

1 that generally, and I'm not sure I can say for certain
2 one way or another yes or no. I mean, the odds are in
3 favor of having done something, utilized something at
4 some point that had Motorola involved in it some way as,
5 you know, as an author or a signee or whatever, but I
6 don't recall any off the top of my head.

7 Q. (By Mr. Kantarek) So when you submit an
8 expert declaration in an IPR, do you follow up with
9 counsel to see what the PTAB says about your opinions?

10 MR. STAVINOHA: Objection. Form.
11 Relevance. Outside the scope.

12 A. Sometimes. Usually as a normal course of
13 the proceeding, I naturally get some feedback such as in
14 this case, where I --

15 MR. STAVINOHA: I will caution the witness
16 not to reveal the substance of any communications with
17 counsel.

18 A. Generally if -- if I've submitted
19 something and a ruling comes back and particularly if
20 there's some sort of follow-up or what have you, by that
21 process I naturally find out about what's going on. But
22 in other cases, not necessarily.

23 My -- my overall experience with attorneys
24 over the years is unless they have something very active
25 that they want you to do, they don't make it a habit to

1 just give you status updates for the sake of giving you
2 status updates.

3 Q. (By Mr. Kantarek) Okay. Let's --

4 A. Sorry, did you say something?

5 Q. Yeah, I did but I paused.

6 I'm going to mark an exhibit. So you
7 should -- if you refresh your marked exhibits folder, you
8 should see an Exhibit 1. And if you could open that up
9 for me, and let me know when you have it.

10 (Exhibit Number 1 was marked.)

11 A. The Draft Kings thing? Where am I looking
12 at something?

13 Q. It should be your declaration in support of
14 petition for inter partes review of US Patent Number
15 9,445,251. In the marked exhibits folder, it should say
16 Exhibit 0001.

17 MR. STAVINOHA: David, you will need to go
18 down to the Motorola solutions folder for this particular
19 case to find it.

20 A. Yeah, I'm not seeing it is the thing. I
21 see an old one. It's almost like I'm stuck in a past
22 deposition. I don't see anything.

23 Q. (By Mr. Kantarek) You might have to go up
24 a level or two to the overall folder structure. Mine says
25 shared and then exhibit share, and then under that is each

1 of the different depositions. So I think you want to go
2 to Motorola Solutions, Inc., versus STA Group IPR
3 2023-01 --

4 A. Yeah. Actually, I don't have that. Let
5 me -- literally, it's like I'm in a deposition I did a
6 year and a half ago. Let me log out of that.

7 MR. STAVINOHA: Counsel, do you want to go
8 off the record while he --

9 MR. KANTAREK: Yeah, let's go off the
10 record.

11 THE COURT REPORTER: We're off the record.
12 (Recess from 9:51 a.m. to 9:59 a.m.)

13 THE COURT REPORTER: We're back on the
14 record.

15 MR. KANTAREK: Why don't we just take a
16 ten-minute break, that's fine. So 10:08 Mountain?

17 THE DEPONENT: Yeah.

18 MR. KANTAREK: Okay. All right.

19 THE COURT REPORTER: We're off the record.
20 (Recess from 9:59 a.m. to 10:09 a.m.)

21 THE COURT REPORTER: We're back on the
22 record.

23 Q. (By Mr. Kantarek) All right.
24 Mr. Williams, you have in front of you what has been
25 marked as Exhibit 1 to your deposition. This is a

1 declaration of David Willard Williams in support of
2 petition for inter partes review of US Patent Number
3 9,445,251; is that right?

4 MR. STAVINOHA: I'm going to object to
5 this exhibit, Counsel, based on hearsay, relevance,
6 outside the scope.

7 A. Yes, I see it.

8 Q. (By Mr. Kantarek) Just turn, if you would,
9 for me to Paragraph 30, which is on Page 12 of the
10 declaration.

11 A. Changed the pages. It went to the next
12 exhibit.

13 Q. It's page -- I don't -- I'm not giving you
14 the PDF page. I'm just giving you the page of -- at the
15 bottom.

16 A. At the bottom? Did you say 12?

17 Q. Yes. Paragraph 30.

18 A. Oh, Paragraph 30.

19 Q. Are you there?

20 A. It starts with -- the type of -- section
21 is "Overview of the ' '251 patent"?

22 Q. That's right. So if you look at the first
23 sentence, it says, "The ' '251 patent describes methods
24 and systems for individuals to set up an ad hoc digital
25 and voice network allowing users to coordinate their

Page 33

1 activities."

2 Do you see that?

3 A. Yes.

4 Q. And the last sentence of that portion of
5 that paragraph that's on Page 12 that says, "The ' '251
6 patent explains that its system -- its system and method
7 are 'especially useful for police, firefighters, military,
8 first responders, or other emergency situations for
9 coordinating different organizations at the scene of a
10 disaster.'"

11 Do you see that?

12 A. Going over to the next page, yes.

13 Q. It also states in Paragraph 31 that "The '
14 '251 patent further alleges that, quote, Coordinating
15 different organizations at the scene of a disaster
16 presents several problems as our voice and digital data
17 (text messages, communications that need to be constantly
18 appearing up and down the chain of command.)"

19 Do you see that? Sorry, I don't know if
20 your answer was -- I didn't hear your answer. I saw your
21 mouth move.

22 A. Yes. I see it.

23 Q. Oh. All right. So the -- this is a
24 declaration you submitted regarding the invalidity of the
25 ' '251 patent; is that right?

Page 34

1 MR. STAVINOHA: Objection. Relevance.
2 Outside the scope.

3 A. Certainly appears to be. If I recall,
4 this was many, many years ago, but generally, yes.

5 Q. (By Mr. Kantarek) And considering the
6 excerpts we read from Paragraph 30 and 31, would you
7 consider the subject matter of the ' '251 patent to be
8 similar to the subject matter of the ' '802 patent?

9 MR. STAVINOHA: Objection. Relevance.
10 Outside the scope.

11 A. It depends on how you look at it.
12 Obviously both involve emergency services, but this is
13 about -- this particular patent, if I recall correctly,
14 was about the responding of a -- you know, a four-alarm
15 fire and you are getting people who were coming from all
16 sorts of different units, not just a single unit but
17 units across town or even visiting people from out of
18 state and police and EMTs and all sorts of other things.

19 And the idea was to be able to -- instead
20 of essentially managing -- trying to manage that herd of
21 cats manually, setting up an ad hoc network, that what's
22 that means, out of -- essentially out of nothing
23 unplanned for all of them to communicate such that there
24 can be some coordination.

25 So in that respect, it's a very distinct

Page 35

1 thing from what we're talking about today. Both having
2 to do with the emergency communications, but there's lots
3 of different aspects and dimensions and problems that
4 emergency and emergency communications have, and I would
5 say this is something very distinct from today's
6 discussion.

7 Q. (By Mr. Kantarek) So you consider the
8 subject matter of the ' '251 patent, which is Patent
9 Number 9.445,251 to be very distinct from today's
10 discussion?

11 MR. STAVINOHA: Objection. Relevance.
12 Outside the scope.

13 A. It's talking about ad hoc networks and so
14 on that basis, this is -- this is not about today's
15 discussion and I don't think it has the word "ad hoc"
16 anywhere in it. But I haven't done any sort of
17 cross-comparison.

18 THE DEPONENT: Excuse me, sorry. One of
19 my dogs wants to come in.

20 I haven't done any sort of cross-analysis
21 between this patent and today's patent to see
22 commonalities, similarities, distinctions, what have you.
23 Not to mention this was -- I don't know what the date on
24 this, I want to say it was like 2015 or something. But
25 it was definitely several years ago and I haven't thought

1 of it in quite a while. So, you know, that's about the
2 extent of which I can answer you.

3 Q. (By Mr. Kantarek) So considering the text
4 of Paragraphs 30 and 31 -- strike that.

5 Are you familiar with the concept of
6 analogous art?

7 A. Yes.

8 Q. So if this -- if the ' '251 patent were
9 prior art to the ' '802 patent, you would not consider it
10 to be analogous art?

11 MR. STAVINOHA: Objection. Form.
12 Relevance. Outside the scope.

13 A. I haven't looked at the ' '251 patent in
14 years. I don't remember all the dimensions of it. I
15 remember it was about ad hoc networks and what I just
16 described, but beyond that I haven't -- I don't remember
17 any of the details and I certainly haven't done an
18 analogous art analysis of that relative to this matter.
19 So I can't answer that hypothetical.

20 Q. (By Mr. Kantarek) I would like to give you
21 one -- or I'm going to mark another exhibit.

22 A. I need to back out of this one?

23 Q. All right. So I have added another exhibit
24 to the marked exhibits folder. It should be Exhibit 2.
25 If you can open it up, and let me know when you have it.

Page 37

1 (Exhibit Number 2 was marked.)

2 A. Okay. I do.

3 Q. This is Motorola Solutions web page titled
4 Dispatch Console Accessories; right?

5 MR. STAVINOH: Counsel, I'm going to
6 object to Exhibit 2 under foundation, authentication,
7 hearsay, relevance, outside the scope.

8 Q. (By Mr. Kantarek) Do you see that,
9 Mr. Williams?

10 A. Yes, I do.

11 Q. Is it your understanding that the ' '802
12 patent technology involves the use of dispatch consoles?

13 A. I don't remember this -- I mean, this
14 exhibit vaguely looks familiar, but I remember absolutely
15 zero about it. So I don't know what's contained within
16 this discussion of the concept of discussion -- dispatch
17 console and I certainly haven't done any comparison of it
18 to today's matter.

19 Q. Maybe you didn't understand my question.
20 So I'm talking about the ' '802 patent. I'm asking if
21 it's your understanding that the ' '802 patent technology
22 involves the use of dispatch consoles?

23 MR. STAVINOH: Objection. Form.

24 A. I would have to go back to the '802 to
25 look to see if it uses the word "console." I don't

Page 38

1 remember the word "console." I mean, there's --
2 there's -- I think there's display components to it, but
3 whether that's the console-type things discussed here
4 versus what might be considered console stuff in the
5 '802, I have no idea.

6 Q. (By Mr. Kantarek) So is it your
7 understanding that the ' '802 patent technology involves
8 dispatchers?

9 MR. STAVINOHA: Objection. Form.

10 A. The '802, I think we went over that at the
11 beginning of today, does reference dispatchers as -- in a
12 number of forms.

13 Q. (By Mr. Kantarek) So you would say that
14 the ' '802 patent technology involves dispatchers?

15 A. The ' '802 patent--

16 MR. STAVINOHA: Object --

17 A. The ' '802 patent uses the word -- term,
18 concept "dispatcher."

19 Q. (By Mr. Kantarek) But you are not prepared
20 to say whether the technology of the ' '802 patent
21 involves dispatchers, only that the word is used in the
22 patent?

23 MR. STAVINOHA: Objection. Form.

24 A. Well, we can go back to the '802 and see
25 how it uses the word "dispatcher." I think it was at

1 least in one embodiment, which presumably would have some
2 technical components described in that embodiment, but I
3 don't remember what those were off the top of my head. I
4 didn't memorize the passage.

5 Q. (By Mr. Kantarek) Sure. My question is
6 much broader than do you know words that are in the ' '802
7 patent.

8 So I'm just wondering if it's your
9 understanding that the technology of the ' '802 patent
10 seeks to solve problems dispatchers faced at the time of
11 invention?

12 A. Well, we started out today talking about
13 the problems that involve -- that the '802 was intending
14 on solving, particularly overlapping of messages. And
15 the '802 also utilizes the term "dispatch" or
16 "dispatcher" in various places within it.

17 So -- and then third, dispatchers would be
18 likely to be a -- very much a -- a -- an experimenter of
19 multiple people trying to talk at them simultaneously.
20 So all of those, I'm prepared to acknowledge.

21 But have -- you know, I haven't done a
22 specific analysis in -- about the question that you
23 phrased exactly. So I -- it's not a hypothetical I'm
24 prepared to answer specifically. But I acknowledge all
25 the different piece parts that I talked about earlier.

Page 40

1 Q. So you are not prepared to answer the
2 question of whether it's your understanding that the
3 technology of the ' '802 patent seeks to solve problems
4 dispatchers faced?

5 MR. STAVINOHHA: Objection. Form.

6 A. And I think I already answered it. That
7 dispatchers face the overlapping messages communications
8 problem like other types of emergency communications
9 users, and the '802 purports to address that problem. So
10 ergo, it would help, potentially, dispatchers.

11 Q. (By Mr. Kantarek) So the -- the solution
12 the '802 offers would potentially help dispatchers, is
13 what you said; right?

14 MR. STAVINOHHA: Objection. Form.

15 A. I -- the parts that I said was dispatchers
16 would experience over -- receiving overlapping messages
17 and that is a problem, and the '802 purports to solve or
18 at least address in some form that issue. So if you
19 combine the two together, then potentially, a dispatcher
20 could be a beneficiary of the '802 assuming it actually,
21 you know, does what it's supposed to do and et cetera,
22 et cetera.

23 So it's a -- it's a -- it's a logical
24 progression as opposed to a stated purpose of the ' '802
25 patent.

1 Q. (By Mr. Kantarek) Can you -- do you have
2 the ' '802 patent, Exhibit 1001 handy?

3 A. Yeah.

4 Q. I'm directing you to Column 1, Line 25. It
5 says, "The receipt of multiple radio messages at one time
6 creates confusion for an operator who needs to reply/act
7 on each incoming message -- radio message."

8 Do you see that?

9 A. Yes.

10 Q. And this is what you were referring to in
11 our discussion of the relevance of dispatchers to the '
12 '802 patent; right?

13 A. I was referring to our overall discussion
14 of that of which this passage was part of that.

15 Q. And again, taking you back to Column 3 --
16 scratch that -- or not scratch that. Strike that.

17 All right. I would like you to open up
18 Exhibit 1004, what's previously been marked as
19 Exhibit 1004 in this proceeding. That's the Ohel
20 reference. Let me know when you have that.

21 (Exhibit Number 1004 was marked.)

22 A. I have got it.

23 Q. All right. This is United States Patent
24 Application Publication 2004/0117859. The inventor is
25 Hagai Ohel, O-h-e-l. Do you see that?

Page 42

1 A. Yes.

2 Q. So if I refer to Exhibit 1004 as Ohel, you
3 will understand what I'm talking about?

4 A. Yes.

5 Q. I think earlier today, it may not have been
6 on the record, you mentioned that -- you mentioned
7 overtalk; right?

8 A. I don't remember.

9 Q. What's your understanding of the term
10 "overtalk"?

11 A. Well, I'm trying to remember if and how
12 the ' '802 patent used it. But colloquially and
13 generally it's essentially multiple people talking over
14 each other.

15 Q. So looking specifically at Ohel, if you go
16 to Paragraph 5. And let me know -- again, just overall,
17 let me know if when I'm referring you somewhere, you don't
18 understand my convention. But you have experience in
19 these proceedings, so I'm just going to make some
20 assumptions about paragraph numbers, but again, please let
21 me know if there's any issues.

22 A. I'm on Paragraph 5.

23 Q. If you go down, third sentence, it says,
24 "In an example where police are communicating with one
25 another, when a first officer is talking over the dispatch

1 channel, all other officers tuned into that channel can
2 hear the first officer and cannot talk until the first
3 officer completes the communication.

4 "However, if a police dispatcher begins
5 talking, the first officer's transmission is cut off and
6 the dispatcher's communication is transmitted over the
7 dispatch channel instead of the first officer's
8 transmission. This feature is referred to herein as
9 overtalk."

10 Do you see that?

11 A. Yes.

12 Q. Does that definition of overtalk -- strike
13 that.

14 Do you agree with that definition of
15 overtalk?

16 A. I don't know if that's the only definition
17 of overtalk. I think that is very consistent with what I
18 just described colloquially.

19 Q. So my question was just do you agree with
20 that definition. Do you agree with the definition?

21 A. I think based -- they explain what the
22 scope of the -- what they mean by the term. So I agree
23 with how they characterize it in this -- in this
24 particular -- in this particular context.

25 Q. What other -- what context would this

Page 44

1 definition of overtalk not be correct in?

2 MR. STAVINOHA: Objection. Form.

3 A. I -- I haven't done an analysis of that.

4 In the very next sentence it talks about different
5 instances of overtalk, for example, where there are kind
6 of different combinations of who was talking when and
7 when the button was released and when the -- the person
8 started talking or stopped talking or what have you.

9 I haven't done an analysis -- and this is
10 all done in a multiparty channel as opposed to other
11 types of channels, and so I haven't done a complete
12 analysis of -- all the different terms of -- there are
13 instances or embodiments, whatever you want to say, that
14 would potentially be within what they just described as
15 overtalk.

16 Q. (By Mr. Kantarek) Sorry, Mr. Williams, I'd
17 just appreciate it if you could try to listen to my
18 question.

19 I was just wondering -- you said -- I asked
20 you if you agreed with the definition in Ohel, and you
21 said you agree with how they characterize it in this
22 particular context. So I'm trying to understand in what
23 context you would not agree with that definition. So can
24 you answer that question?

25 A. I haven't done that analysis.

Page 45

1 Q. So no?

2 A. No what?

3 Q. You cannot tell me in what context you
4 would not agree with the definition?

5 A. Not off the top of my head.

6 Q. Is it your understanding that Ohel is
7 trying to solve the problem of officer overtalk?

8 A. I think that's a -- a part of what they're
9 trying to solve. It more broadly, what I think Ohel is
10 really trying to do is prevent lost communications as it
11 states in the bottom of Paragraph 5.

12 Q. And as we discuss, farther up in
13 Paragraph 5, it says, "If a police dispatcher begins
14 talking, the first officer's communication" -- or sorry --
15 "the first officer's transmission is cut off and the
16 dispatcher's communication is transmitted over the
17 dispatch channel instead of the first officer's
18 transmission."

19 That would be a lost communication; right?

20 MR. STAVINOHA: Objection. Form.

21 A. If somebody gets cut off and they're still
22 talking and thinking they kind of have the floor, so to
23 speak, and in reality they don't, yeah, I would call that
24 a lost communication. Excuse me.

25 Q. (By Mr. Kantarek) So if you could turn

Page 46

1 back to your declaration which is, again, Exhibit 1002.
2 And I -- just generally, I would just have that open
3 because we're going to use that in conjunction with some
4 of the other exhibits.

5 But if you could let me know when you have
6 that.

7 A. Yeah. What page or paragraph?

8 Q. Sorry. So directing you to Exhibit 1002,
9 Paragraph 125. That is on Page 83 of the footer.

10 A. Okay.

11 Q. So Paragraph 125, you state, "Ohel
12 discloses or at least renders obvious 'receiving a first
13 message on a first dedicated channel from amongst the
14 plurality of channels" -- you include a bracket -- "at the
15 communication system. The plurality of channels being
16 dedicated to different entities, bracket, e.g., individual
17 officers and the police dispatcher, the first dedicated
18 channel being dedicated to receiving messages from a first
19 entity [e.g., simplex unit 2 set to a dispatch channel].'"

20 Do you see that?

21 A. Yes.

22 Q. And just briefly, Header B on that same
23 page right above Paragraph 125 states claim language from
24 the '802 patent, Claim 1; right?

25 A. "When receiving a first message on a first

Page 47

1 dedicated channel" -- I won't read the whole thing.

2 Q. Well, so you might not have gotten your
3 answer on that, but in any event, Header B is Element 1A
4 as you define it -- strike that.

5 As -- 1A is your naming convention for the
6 element listed in Header B, and that's what we're talking
7 about right now; right?

8 A. Yeah. And I -- I guess I will read it
9 completely just so there's no ambiguity on the record.

10 Header -- Header B is "When a: Receiving
11 a first message on a first dedicated channel from amongst
12 the plurality of channels at the communication system,
13 the plurality of channels being dedicated to different
14 entities, the first dedicated channel being dedicated to
15 receiving messages from a first entity."

16 Q. So just briefly, my question -- this is
17 just an example. I'm just again wanting to ask if you
18 could just listen to my question. I -- I'm not trying to
19 be combative. This is just kind of an example, I just
20 asked if it was your naming convention and then you read
21 the whole thing. So I will just try to avoid -- I would
22 appreciate it if you could avoid that in the future.

23 In any event, so this element, it talks
24 about a first dedicated channel being dedicated to
25 receiving messages from a first entity; right?

1 A. Correct.

2 Q. So in Ohel, what -- what element or
3 disclosure do you map to the first entity claimed in
4 Claim 1?

5 MR. STAVINOHA: Objection. Form.

6 A. I know you don't want me to read it. That
7 mapping is disclosed in Paragraphs 126 through 131.
8 So...

9 Q. (By Mr. Kantarek) So I guess just to step
10 back. I have no problem with you reading things broadly
11 as long as it's responsive to my questions.

12 My specific question here, and -- and let
13 me just -- so strike that. We will start over.

14 Your answer is that the first entity
15 claimed in 1A is somewhere in Paragraphs 126 through 128?

16 MR. STAVINOHA: Objection. Form.

17 A. Well, the -- the overall -- your original
18 use of the word "mapping," but the overall description of
19 how this claim element is met is Paragraphs 125 to 131.

20 Q. (By Mr. Kantarek) I understand how you
21 structured your declaration. I'm trying to understand
22 from you what element or item or part of Ohel do you
23 contend is the claimed first entity.

24 MR. STAVINOHA: Objection. Form.

25 A. Well, the entities involved in Ohel

1 relative to this claim element are the different entities
2 or the individual officers and the police dispatcher.

3 Q. (By Mr. Kantarek) Okay. So Claim 1 talks
4 about a first entity and a second entity; right?

5 A. Yes.

6 Q. And in opining that Ohel renders Claim 1
7 obvious, Claim 1 of the '802 patent obvious, you say
8 Ohel's disclosure of a first entity is individual officers
9 and the police dispatcher?

10 A. The claim element talks about different
11 entities, and the entities involved are the individual
12 officers and the police dispatcher.

13 Q. And I think you've heard my question now
14 quite a few times. I'm asking if you can tell me what the
15 first entity is. So you've told me different entities.
16 So now what's next is the claim says, "The first dedicated
17 channel being dedicated to receiving messages from a first
18 entity."

19 So what is the first entity that Ohel
20 discloses in your opinion?

21 A. Well, it potentially is the -- is
22 different officers and/or the dispatcher.

23 Q. So your opinion that Ohel renders element
24 1A obvious is based on a first entity potentially being
25 different officers and/or the dispatcher?

1 MR. STAVINOHA: Objection. Form.

2 A. The overall nature of Ohel in this
3 particular context is you have a police officer's
4 communication unit with a variety of dedicated channels
5 that can be talking to a variety of other people
6 including other police officers or the police dispatcher.
7 And thus, the -- the entities involved are the police
8 officers and the dispatcher.

9 Q. (By Mr. Kantarek) Mr. Williams, do you
10 understand that the claim says -- it says "different
11 entities" in one portion, which you keep talking about,
12 but it also says "a first entity."

13 So I'm simply trying to understand what you
14 identify as the first entity -- as a first entity in Ohel.
15 Are you not able to answer that question?

16 MR. STAVINOHA: Objection. Form. Asked
17 and answered.

18 A. So part -- one of the embodiments -- and I
19 described this essentially in Paragraph 130 -- is you
20 have the police officer who is talking to another police
21 officer, and that would be the first entity. And then
22 you have a second entity, in this embodiment the
23 dispatcher transmitting on another channel to that
24 officer and that's the second entity.

25 Q. (By Mr. Kantarek) Okay. So the first

1 entity is an officer and the second entity is a
2 dispatcher; is that right?

3 A. But it can be mixed and matched, just
4 depending on the embodiment. That particular embodiment
5 is describing the police officer talking to another
6 police officer, the first entity, and then interrupted by
7 the second entity, the dispatcher.

8 Q. So your opinion allows for mixing and
9 matching first and second entities to render Claim 1
10 obvious?

11 MR. STAVINOHHA: Objection. Form.

12 A. It doesn't preclude other entities. To
13 that -- I mean, the idea around the system is to
14 provide -- one of the ideas, I should say, is not to
15 lock -- is to have predefined protocols and however you
16 wanted to do it. So it just so happens that particular
17 embodiment described is an officer talking to another
18 officer and interrupted by a dispatcher. That doesn't
19 preclude that there's other potential embodiments in
20 terms of how that plays out.

21 Q. (By Mr. Kantarek) Well, let me just ask my
22 question again because I don't -- it doesn't seem like you
23 answered it.

24 Your opinion allows for first and second
25 entities to be mixed and matched to render Claim 1

1 obvious; right?

2 MR. STAVINOHA: Objection. Form.

3 A. I would say my opinion allows the
4 specifics of individual -- first and second entities to
5 vary depending on the particular use case as long as that
6 particular use case meets the needs of the claim.

7 Q. (By Mr. Kantarek) So taking you to
8 Paragraph 127, at about the second to the last paragraph
9 on this page of -- sorry. Strike that.

10 The second to the last sentence on this
11 page of Paragraph 127 states, "It would have been
12 understood that Ohel's dispatch channel is a channel
13 dedicated to communications with a dispatcher."

14 Do you see that?

15 A. Yes.

16 Q. And so in this section, in your opinion, a
17 police dispatcher can be either a first or a second
18 entity; right?

19 MR. STAVINOHA: Objection. Form.

20 A. Excluding that, the particular example
21 further in the section is where the dispatcher would be
22 the second entity. But that doesn't mean it couldn't in
23 some use case be the first entity.

24 Q. (By Mr. Kantarek) I see. So your -- your
25 opinion is the claim -- your opinion is that Ohel renders

Page 53

1 Claim 1 of the '802 patent obvious in part because it
2 discloses a police dispatcher as the claimed second
3 entity?

4 MR. STAVINOHHA: Objection. Form.

5 A. I -- my rationale for how Ohel meets that
6 is described here. You are trying to paraphrase, and I'm
7 not going to paraphrase a multi paragraph discussion into
8 a yes-or-no answer to a single sentence.

9 Q. (By Mr. Kantarek) So you're -- sitting
10 here today, you are not prepared to tell me what you
11 identify as the second claim, second entity -- strike
12 that.

13 Sitting here today, you are not prepared to
14 tell me what you identify as the second entity claimed in
15 the '802 patent? Strike that.

16 Sitting here today, you are not prepared to
17 tell me what you identify in Ohel as rendering obvious the
18 claimed second entity in the '802 patent?

19 MR. STAVINOHHA: Objection. Form.

20 A. The particular example that I utilize in
21 this section has the dispatcher as the second entity.
22 There -- but I am not saying that only the dispatcher can
23 be the second entity.

24 Q. (By Mr. Kantarek) You are saying that a
25 police officer can also be the second entity?

1 A. It's possible -- it's possible. I'm
2 not -- I'm not precluding anything. I'm saying Ohel
3 meets the needs of the claim through its disclosure of
4 how its systems operates relative to these claim
5 limitations, and the particular embodiment is when
6 there's a police officer being on -- being the first
7 entity and the dispatcher being the second entity.

8 Q. But you are saying it's possible that the
9 second entity is also a police officer?

10 A. I would say that's possible, sure.

11 Q. So is -- in your opinion, two officers --
12 let's say two officers in the same -- strike that.

13 So two officers in the same unit talking
14 over the system disclosed in Ohel could be two different
15 entities, is that your opinion?

16 MR. STAVINOHA: Objection. Form.

17 A. I think that -- that the '802 describes
18 that possibility when it refers to an entity as including
19 the concept of a user. So those would be two different
20 users and two different entities, potentially.

21 Q. (By Mr. Kantarek) So let's go to
22 Paragraph 127, footnote 4, which might be what you were
23 referring to.

24 This is in Exhibit 1002. You talk about
25 examples of entities and you cite the '802 patent at,

Page 55

1 excuse me, 1, 15 through 21. Do you see that?

2 A. Yes.

3 Q. And that's Column 1, Lines 15 through 21?

4 A. Yes.

5 Q. Could you open up or take yourself to that
6 section of the '802 patent, please.

7 A. All right. I'm there. I don't --

8 Q. Yeah. Sorry. I'm just -- I'm shuffling
9 papers around. You can just wait one moment.

10 A. Okay. Sorry, I didn't know if I missed a
11 question.

12 Q. I understand. That's no problem.

13 So that portion of the '802 patent says,
14 "Each emergency communication system supports a plurality
15 of communication channels wherein each channel may be
16 dedicated to a group/locality/unit. For example, the fire
17 department can allocate one channel to every school or
18 other public places such as shopping malls so as to enable
19 effective communication during an emergency."

20 Do you see that?

21 A. Yes.

22 Q. So your opinion is that examples of
23 different entities are group/localities/units such as the
24 fire department; right?

25 MR. STAVINOHA: Objection. Form.

Page 56

1 A. That -- those are a part of the examples.

2 Q. (By Mr. Kantarek) So in your
3 understanding, if the fire department allocated a channel
4 to a school, that school would be an entity?

5 A. It could be a school. It could be
6 principal's office on one channel and a -- and a safety
7 officer or the nurse on another channel. I -- and
8 it's -- I mean, it's -- this isn't the broader overall
9 field of examples or inventions. So I'm just getting
10 kind of the next level of detail what it might mean to be
11 allocated to a school, what that would mean in
12 practicality.

13 Q. My question again, if in this example that
14 you cited and in the declaration you just read the fire
15 department allocated one channel to a school, that school
16 would be an entity?

17 MR. STAVINOHA: Objection. Form.

18 A. I think that's one way of -- of -- of
19 viewing it. And if you -- again, if you looked at it
20 practically, it may be that they -- it was -- you know,
21 the school is a thing, of course, and so to communicate
22 you need to communicate with something other than just,
23 you know, an inanimate building.

24 So the details of who the rep -- who would
25 actually be the user, if you will, which the -- the '802

1 describes as part of the entity would be a next-level
2 detail discussion.

3 Q. (By Mr. Kantarek) That was going to be my
4 next question. So we talked about a little bit earlier
5 that entities include users; right?

6 A. Right.

7 Q. So if the entity is a school, it could
8 include users, like as you mentioned, the principal or the
9 nurse's office?

10 MR. STAVINOHA: Objection. Form.

11 A. It just -- it just depends. If you -- if
12 you wanted, you would have multiple channels in that
13 regard. Potentially one to go to the principal's office
14 and one going to the nurse's office. Or if you were -- I
15 guess maybe if you were just a 911 dispatcher, you only
16 care about going into the nurse's office and forget all
17 the administrative people. It just depends on the
18 particular embodiment.

19 Q. (By Mr. Kantarek) So when Claim 1 talks --
20 Claim 1 of the '802 patent talks about a dedicated channel
21 dedicated to a first entity; right?

22 A. I'm sorry. Say that again.

23 Q. Oh, so Claim 1 of the '802 patent claims,
24 in part, we just talked about, a first dedicated channel
25 being dedicated to receiving messages from a first entity,

1 okay.

2 THE COURT REPORTER: I'm sorry, can you
3 repeat that question?

4 MR. KANTAREK: Sure.

5 Q. (By Mr. Kantarek) The '802 patent claims a
6 first dedicated channel being dedicated to receiving
7 messages from a first entity; right?

8 A. Correct.

9 Q. And in the example where the first entity
10 is, for instance, a school, the users included in that
11 entity could be a principal or nurse's office; right?

12 MR. STAVINOHA: Objection. Form.

13 A. I was using them to illustrate the concept
14 of users. The '802 patent as this footnote makes very
15 clear doesn't define entities but provides the examples
16 such as the group locale unit, like the school concept --
17 the school level of detail as well as elsewhere users and
18 devices. So it is broad in that respect in terms of what
19 an entity might be.

20 Q. (By Mr. Kantarek) Sorry. I'm going to
21 just ask my question again and I hope you can just listen
22 to it and try to answer it instead of just -- your answer
23 was about a concept of users.

24 So my question is: In an example where the
25 first entity -- sorry. Strike that.

Page 59

1 So we talked about the claim language. So
2 I don't want to ask that question again. But we -- you
3 understand that the '802 patent claims a first dedicated
4 channel being dedicated to receiving messages from a first
5 entity; right?

6 A. Correct:

7 MR. STAVINOHA: Objection. Form.
8 Argumentative.

9 Q. (By Mr. Kantarek) And so in that
10 example -- or sorry. Strike that.

11 So if a claimed first entity is a school,
12 users included in that entity could be a principal's
13 office or a nurse's office; right?

14 MR. STAVINOHA: Objection. Form.

15 A. I know I brought that up, I'm just
16 wondering if that was speaking ahead of myself. Because
17 I haven't done that analysis, frankly, in terms of a
18 school-level user analysis relative to the -- this claim.
19 So...

20 Q. So you would have to do a separate analysis
21 to determine whether in the example where a first entity
22 is a school, if a user could be a principal's office or a
23 nurse's office?

24 A. I would have to think about that more.
25 The '802 is clear that the -- an entity can be a school

Page 60

1 as well as an entity can be a user. What I didn't do and
2 get into the analysis if you were attempting to
3 incorporate both types of entities into one embodiment in
4 that -- how that would play out specifically, and I
5 certainly didn't do it with respect to a nurse school
6 context.

7 Q. So when you see in the '802 patent at
8 Line -- at Column 1, Line 18, that you cite in your
9 declaration, it says, "The fire department can allocate
10 one channel to every school." If that school is the
11 claimed first entity in Claim 1, you're not able to
12 analyze whether a principal's office or a nurse's office
13 could be a user included in that entity?

14 MR. STAVINOHAN: Objection. Form.

15 A. I have -- I haven't done that kind of
16 analysis yet.

17 Q. (By Mr. Kantarek) And that's not something
18 you can do sitting here. It's too complicated?

19 A. I -- I'm reluctant to do it because there
20 are -- in any sort of what-if-type hypothetical, there's
21 always -- there's always details and the devil is in the
22 details and sometimes that devil can -- is deeply varied
23 in the details and can take the answer in a much
24 different direction than just thinking about the details
25 at a high level.

1 Q. So I guess talking about details here, in
2 footnote 4 of Paragraph 127 of Exhibit 1002, which is your
3 declaration, you say the '802 patent does not define
4 entities but examples include group/locality/unit; right?

5 A. As well as users and devices, yes. And
6 that's right out of the '802 wording, so...

7 Q. Column 1, Lines 15 through 21, they don't
8 use the term "entity"; right?

9 A. The word "entity" is not in that specific
10 passage.

11 Q. And even broadening it to Column 1, Line 13
12 through 21, which is an entire paragraph, that doesn't
13 include the term "entity"; right?

14 A. That doesn't, but the very next sentence
15 says this allocation of dedicated channels to different
16 entities. So that is a -- in my person of ordinary skill
17 in the art seems like it is very directly talking about
18 the fire department or schools or what have you.

19 Q. But you didn't cite Line 22 of Column 1 in
20 footnote 4, did you?

21 A. No, I didn't.

22 Q. So looking at the other cite in that -- in
23 that footnote is 7, 18 through 20; right? Column 7, Line
24 18 through 20?

25 A. Right.

1 Q. So I would like to look at the entire
2 paragraph that includes Lines 18 through 20 of Column 7
3 that starts at Line 14 and ends at Line 24.

4 Do you see that?

5 A. Yes.

6 Q. The beginning of that paragraph says,
7 "Although specific protocols have been used to describe
8 embodiments, other embodiments can use the -- use other
9 transmission protocols or standards."

10 Do you see that?

11 A. Yes.

12 Q. Then the next sentence talks about "Use of
13 the term 'peer client' and 'server' can include any type
14 of device, operation, or other process"; right?

15 A. Right.

16 Q. Now, the sentence you cite is the next
17 sentence, which we already talked about, which says, "The
18 invention can operate between any two processes or
19 entities including users, devices, functional systems or
20 combinations of hardware and software"; right?

21 A. Right.

22 Q. So your position -- is your position that
23 entities include functional systems?

24 A. I didn't do that -- that specific analysis
25 for the -- this purpose.

Page 63

1 Q. So sorry. So on footnote 4 you say, "The
2 patent provides examples of entities such as 'users'
3 devices."

4 So there's a list here in your cite,
5 "users, devices, functional systems or combinations of
6 hardware and software."

7 Do you see that?

8 A. Yes.

9 Q. So you are saying that '802 patent defines
10 an entity as a user; right?

11 MR. STAVINOHA: Objection. Form.

12 A. I said the '802 patent includes as an
13 example a user.

14 Q. (By Mr. Kantarek) Sure. And so does the
15 '802 patent include as an example of an entity, functional
16 systems?

17 A. Well, as any two processes or entities,
18 between any two processes or entities. So it's -- it's
19 a -- not specifically defined functional system is a
20 process or entity, but in any event, it wasn't necessary
21 for my analysis because I -- to me it was clear that it
22 was using users and devices as examples of entities.

23 Q. But not the other two terms in that list.

24 A. I didn't -- I didn't look at those one way
25 or another.

1 Q. You stopped reading after the word
2 "devices"?

3 MR. STAVINOHA: Objection. Form.

4 A. I didn't stop reading. I didn't use those
5 additional words in this footnote because I didn't think
6 it was necessary.

7 Q. (By Mr. Kantarek) Your testimony was you
8 didn't look at those one way or another; right?

9 MR. STAVINOHA: Objection. Form.

10 A. Well, okay, that was then loose words on
11 my part. I looked at the entire patent. I did not cite
12 to functional systems or combinations of hardware and
13 software as part of this footnote because it wasn't
14 necessary.

15 Q. (By Mr. Kantarek) That's not true. Your
16 citation is to Column 7, Line 18 through 20. The entirety
17 of line 20 says "systems, or combination of hardware and
18 software. Peer"; right?

19 MR. STAVINOHA: Objection. Form.

20 A. Yeah. So that citation -- I -- we're
21 getting into mids here. I didn't cut it off mid
22 sentence.

23 Q. (By Mr. Kantarek) So you didn't cut your
24 cite off, but you cut off your consideration of the terms
25 at the end of the sentence?

1 MR. STAVINOHA: Objection. Form.

2 A. I didn't use the term -- sorry.

3 THE DEPONENT: Do you want to finish the
4 objection?

5 MR. STAVINOHA: Objection. Form.

6 A. I didn't include in the quotation part of
7 those citations, the functional systems or combinations
8 of hardware and software. But I include -- but those
9 words were a part of the entire numeric representation,
10 which was the entirety of that sentence.

11 Q. (By Mr. Kantarek) So your understanding of
12 the sentence is that it defines entities as users and
13 devices; right?

14 A. It includes examples of entities as users
15 and devices.

16 Q. All right. So your understanding of Column
17 7, Line 18 is that the ' '802 patent includes examples of
18 entities as users and devices; right?

19 A. That -- I think I agree with you. That
20 passage includes as examples of entities users and
21 devices, which I think is what you said.

22 Q. But the other terms "functional systems" or
23 "combinations of hardware and software" in that same list,
24 those are not examples of entities?

25 MR. STAVINOHA: Objection. Form.

1 A. They may be. I did not get to that -- did
2 not include that level of detail in the -- in the
3 citation you're -- with respect to Ohel because it was
4 focused on the users and devices portion.

5 Q. (By Mr. Kantarek) Well, I'm asking you for
6 your understanding. You looked at this -- this -- this
7 sentence and you said, hey, the ' '802 patent defines --
8 or defines -- sorry. Strike that.

9 You looked at this disclosure and you said
10 these are examples of entities, users and devices. Why do
11 you exclude functional systems and combinations of
12 hardware and software as examples of entities?

13 MR. STAVINOHA: Objection. Form.

14 A. I didn't exclude them. I didn't -- in the
15 context of this limitation in Ohel, I did not do that as
16 being specifically relevant to that part of the
17 discussion.

18 MR. STAVINOHA: Counsel, we've been going
19 for about an hour now --

20 MR. KANTAREK: I was actually ready --

21 MR. STAVINOHA: -- are you ready for a
22 break?

23 MR. KANTAREK: Yeah. So our lunch is
24 coming in about 10 or 15 minutes, so I was hoping we
25 could do another 15 and then break for lunch. Does that

Page 67

1 work for the witness?

2 MR. STAVINOHA: Dave, if you need a break,
3 we can go ahead and break now and just take a longer
4 break to accommodate their lunch or whatever works for
5 you.

6 MR. KANTAREK: And I'm happy -- oh, I'm
7 sorry.

8 THE DEPONENT: Yeah, I mean, do you want
9 to kind of finish up this line?

10 MR. KANTAREK: Yeah, that's all I'm
11 saying. I'm happy to let our -- wait on our lunch, but I
12 figured I might as well finish with as much -- as far as
13 I can get and then we can take a lunch break and then we
14 can go if that works for Mr. Williams.

15 THE DEPONENT: Okay.

16 Q. (By Mr. Kantarek) So turning to
17 Paragraph 132 of your declaration, which is Exhibit 1002.
18 It's just the next page.

19 Do you have that in front of you?

20 A. Yeah.

21 Q. This is regarding element -- what you label
22 as Element 1B, which says, "Receiving a second message on
23 a second dedicated channel being dedicated to receiving
24 messages from a second entity from amongst the plurality
25 of channels at the communication system, the second

Page 68

1 message overlapping with the first message in time."

2 I would like to talk specifically about the
3 second entity. Your opinion is that the second entity
4 could be a police officer or a dispatcher; right?

5 MR. STAVINOHA: Objection. Form.

6 A. It could be potentially any other -- any
7 other user. The embodiment that I cite in Ohel is a --
8 an officer talking to another individual, probably a
9 police officer but not even necessarily so, and then the
10 second entity is being interrupted by the dispatcher.
11 But there's no -- there's no limiting it to that kind of
12 embodiment. It's an embodiment. It's an example. It's
13 not a definitive you can only use these people.

14 Q. (By Mr. Kantarek) So your opinion -- your
15 opinion is that an embodiment of Ohel includes an example
16 of the claimed second entity; right?

17 A. Yes.

18 Q. And what is the example of the second
19 entity that you are saying renders Claim 1 obvious?

20 MR. STAVINOHA: Objection. Form.

21 A. In Paragraph 134, starts out how the
22 police officer is communicating to another individual or
23 receiving a transceiver and that there are a variety of
24 other transceivers. And then during the conversation,
25 the police dispatcher begins to transmit one or more

1 messages to the officer over the APCO Transceiver 7
2 (receiving a second, overlapping message from amongst a
3 plurality of channels dedicated to different entities).

4 Q. So again, I'm just going to ask you again
5 to try to listen to my question.

6 What is the example of the second entity in
7 Ohel that you are saying renders Claim 1 obvious?

8 A. In that example --

9 MR. STAVINOHA: Objection. Argumentative.

10 A. In that example, it is the dispatcher.

11 Q. (By Mr. Kantarek) So your position is that
12 one police officer is the first entity -- sorry. Strike
13 that.

14 Your position is an example of Ohel's
15 alleged invalidating disclosure is that one police officer
16 would be a first -- the claimed first entity and the
17 police dispatcher could be the claimed second entity; is
18 that right?

19 A. In this example, it's the -- another
20 individual that the -- that an officer is talking to is
21 the first entity which -- and it could be a police
22 officer or it could be a common person. It could be his
23 mother, I don't know. And then the -- then the -- in the
24 same example, the dispatcher is the second entity
25 breaking in.

Page 70

1 Q. So the claimed first entity could be an
2 officer's mother, is your opinion?

3 A. That was poor choice of words on my part,
4 so I will retract that.

5 There's no specificity -- there's no
6 mention of mother in any of the patents, so that was poor
7 wording on my part. I apologize.

8 Q. So sorry, so -- so I'm looking at your
9 testimony. So the claimed first entity, you said it could
10 be a common person; right?

11 A. All -- I state the officer is presently
12 talking to another individual by cell phone over the
13 trans -- CDMA transceiver, the CDMA first message.

14 Q. Right. And you understand I'm asking about
15 an entity, which I think -- I assume you understand --

16 A. And that -- and that entity is the
17 other -- is another individual in this -- over the --

18 Q. The claim first entity that you've
19 identified in Paragraph 134 is another individual that an
20 officer is talking to by cell phone; right?

21 A. Correct.

22 MR. STAVINOHA: Objection. Form.

23 Q. (By Mr. Kantarek) Moving to Paragraph
24 135 -- I'm sorry. Strike that.

25 If I could take you to Element 1C, which is

Page 71

1 on the next page, Page 76 -- or I'm sorry, Page 90 of the
2 footer. This element states --

3 A. I would -- if I could interrupt now that I
4 think --

5 Q. Oh, no. Sorry, sir.

6 (Cross talk.)

7 A. I think my --

8 Q. Mr. Williams, Mr. Williams, Mr. Williams,
9 Mr. Williams, there's no question pending. Your attorney
10 will be able to ask you whatever questions you would like
11 on redirect, but again, this is my deposition. So you can
12 wait for a question and you can answer that question.
13 Okay?

14 A. Okay.

15 MR. STAVINOHA: Counsel, you said you
16 wanted to finish your line of questioning. You are about
17 to switch topics. We've been going well over an hour
18 now. I think it would be a good time for a break.

19 THE DEPONENT: Yes.

20 MR. KANTAREK: If Mr. Williams wants to
21 take a break, I thought we were going until 12:30. I
22 thought we had that discussion.

23 THE DEPONENT: No. I thought we were
24 finishing this line of questioning, and you are going on
25 to a new limitation.

Page 72

1 MR. KANTAREK: I see. We had different --
2 okay. I -- I understood the line of questioning to be a
3 little bit longer, but that's fine. We can take a lunch
4 break. How about -- does a lunch break work for you, or
5 is your lunch coming at a different time? Is there an
6 issue? Sorry, let's go off the record.

7 THE COURT REPORTER: We're off the record.
8 (Recess from 11:19 a.m. to 12:04 p.m.)

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

11 Q. (By Mr. Kantarek) Welcome back,
12 Mr. Williams. Before we took a break, we were looking
13 at -- actually one second. Actually, strike that.

14 Did you talk to your counsel on the break?

15 A. No.

16 Q. I'm sorry?

17 A. No.

18 Q. So before we took a break, we were looking
19 at Paragraph 137 of your declaration. That's on Page 90
20 of the footer.

21 A. Okay.

22 Q. So looking at Header D, this is talking
23 about Limitation 1 with the -- labeled 1C, "Determining
24 one or more priorities for the first message received on
25 the first dedicated channel from the first entity and the

1 second message received" -- excuse me -- "on the second
2 dedicated channel from the second entity based on at least
3 one predefined parameter."

4 Do you see that?

5 A. Yes.

6 Q. So in Paragraph 137, where it says at the
7 end -- this is moving up -- turning to the next page, it
8 says "Based on at least one predefined parameter [e.g.,
9 superior user status.]"

10 Do you see that?

11 A. Yes.

12 Q. So in your opinion, the predefined
13 Parameter 1 -- sorry. Strike that.

14 So in your opinion, at least one predefined
15 parameter in Ohel is superior user status; is that right?

16 A. That's correct.

17 Q. And this is the dispatcher in Ohel; right?

18 MR. STAVINOH: Objection. Form.

19 A. A dispatcher can have superior user
20 status.

21 Q. And in fact, Ohel -- if you look at
22 Paragraph 139, you quote Ohel saying, "It is possible for
23 the user's transition to be interrupted, for example, by a
24 superior user such as a dispatcher who has the ability to
25 suppress any existing transmission between users and

Page 74

1 therefore to transmit over or instead of the currently
2 transmitting user"; right?

3 A. Right.

4 Q. So as you mentioned, a dispatcher is an
5 example of a superior user in Ohel?

6 A. Yes.

7 Q. Turning back quickly to Paragraph 138, you
8 talk about a disclosure in the ' '802 patent where it
9 states, "The predefined parameter can be, for example, the
10 type of radio messages, the size of the radio messages,
11 the bandwidth requirement, the channel from which radio
12 messages are received or any possible combination
13 thereof."

14 Do you see that?

15 A. Yes.

16 Q. So in your opinion, what makes a parameter
17 predefined?

18 A. In that the parameter has been selected as
19 a possible way in this context for doing prioritization
20 within the system.

21 Q. So predefined parameter just means it's
22 been selected as a possible option?

23 MR. STAVINOH: Objection. Form.

24 A. Well, in this -- in this case, in Ohel's
25 case, the Ohel is set up so that it is, if a person -- or

1 if there's a predefined parameter of a superior user,
2 that is what is used in the subsequent prioritization.
3 So that's predefined as in already determined and used by
4 the system for that purpose.

5 Q. (By Mr. Kantarek) Well, I think in there
6 you might have answered my question. Predefined means
7 already determined?

8 MR. STAVINOH: Objection. Form.

9 A. It can be. I would have to go back into
10 the '802 and see all the use for the '802 -- or excuse
11 me, all the use of predefined to look at the scope of
12 what it potentially means, but that's one way of looking
13 at it.

14 Q. (By Mr. Kantarek) One way of looking at
15 predetermined is that it's -- sorry. Strike that.

16 One way of looking at predefined is that
17 it's already determined; right?

18 A. I mean, it's plain in ordinary meaning, so
19 I don't want to get into a -- a kind of a thesaurus
20 exercise. Predefined is predefined.

21 Q. So --

22 A. Superior user status --

23 Q. Sorry. Sorry. Sorry.

24 A. -- meets that predefinition.

25 Q. I think just once I start talking, you

1 probably want to wait so that I can ask my question.

2 I'm not talking about in Ohel. I'm talking
3 about look -- if you are looking at Paragraph 138, it's
4 the '802 patent's disclosure. So I'm trying to understand
5 what your opinion is -- excuse me -- on the term
6 "predefined" as used in predefined parameter as claimed in
7 the ' '802 patent.

8 And it sounds like predefined means already
9 determined to you; is that correct?

10 MR. STAVINOH: Objection. Form.

11 A. Again, I don't want to get into any -- an
12 exercise -- a thesaurus exercise of, you know, is
13 predefined the same as predetermined.

14 Q. (By Mr. Kantarek) So you are not willing
15 or prepared to answer the question?

16 MR. STAVINOH: Objection. Form.

17 A. Predefined parameter is predefined
18 parameter.

19 Q. (By Mr. Kantarek) So in Element 1C, it
20 says that the -- that this determining of priorities is,
21 quote, Based on at least one predefined parameter.

22 Do you see that?

23 A. Yes.

24 Q. So what do you point to in this declaration
25 as showing that the priority is based on the superior user

Page 77

1 status?

2 A. I mean, I'm not sure I understand your
3 question. The -- the main body of the declaration for
4 this section between Paragraphs 137 and 142 get to that
5 question.

6 Q. Right. So what's your opinion as to how --
7 so strike that.

8 So we talked about how the predefined
9 parameter that you've pointed to from Ohel is the superior
10 user status; right?

11 MR. STAVINOHA: Objection. Form.

12 A. That's fair.

13 Q. (By Mr. Kantarek) And so the claim
14 language says that it determines one or more priorities
15 based on at least one predefined parameter. So I'm trying
16 to understand how your interpreting based on --

17 So what -- what disclosure of Ohel shows
18 you that a priority determination using a superior user
19 status is -- sorry. Strike that.

20 I'm just trying to understand what your
21 opinion is on the -- based on part of the claim language.
22 So we talked about the predefined parameter. So where in
23 Ohel does it show that a priority determination is based
24 on the fact that someone is a superior user or not?

25 MR. STAVINOHA: Objection. Form.

Page 78

1 A. Well, I describe this in Paragraphs 139
2 and 140 in particular if you want me to read those.

3 Q. (By Mr. Kantarek) I just want you to tell
4 me what you mean by "based on superior user status."
5 If -- if your answer is to read a paragraph, I guess
6 that's your answer, but I can ask the question again.

7 So what is your opinion -- sorry. Strike
8 that.

9 Where in Ohel does it show that a priority
10 determination is based on the fact that someone is a
11 superior user?

12 A. I guess I will have to read it then. Ohel
13 provides -- this is Paragraph 139 -- provides that it is
14 possible for the user's transmission to be interrupted,
15 for example, by a superior user such as a dispatcher who
16 has the ability to suppress any existing transmission
17 between users and therefore to transmit or instead --
18 over or instead of the currently transmitting user.

19 As illustrated in Figure 1 above, Ohel
20 determines if there's an ongoing transmission to be
21 interpreted by a second transmission through a series of
22 inquiries. Specifically inquiry would first be conducted
23 to determine if any intermediate transmission was
24 initiated after the transmission began. If the answer to
25 the inquiry is yes, then another determination would be

1 made to see if the interrupting user is a superior user
2 who would preempt the user's continued transmission
3 (predefined parameter.)

4 If the interrupting user is a superior
5 user, then a user's transmission will be recorded a set
6 above. However, if the interrupting user is not a
7 superior user, then the interrupting user's message would
8 be recorded for playback by the user or another.

9 In Paragraph 140, it says Ohel discloses
10 this priority status, termed "superior user status may be
11 predefined in various ways such as by the specific
12 transceiver type or channel dedicated to the dispatch
13 communication or by an emergency indication within the
14 transmission."

15 Q. Okay. So it -- listening to what you said,
16 it sounds like you quote Ohel as saying a determination
17 would be made to see if the interrupting user is a
18 superior user.

19 In your opinion, would that be determining
20 a priority based on -- at least based on whether one is a
21 superior user or not?

22 A. That is an example of being based on at
23 least one predefined parameter.

24 Q. Moving to Paragraph 141 of your
25 declaration. This is Page 93 of the footer in

1 Exhibit 1002. Here, fourth line down you quote Ohel as
2 talking about "The Unit 1 according to the invention
3 provides the user with the ability to record any number of
4 simultaneous transmissions to the user without loss of
5 information from any of the potential sources."

6 Do you see that?

7 A. Yes.

8 Q. So Unit 1 here is a police officer's unit;
9 is that right?

10 A. Yes.

11 Q. And it says it would record -- sorry. In
12 the next sentence it talks about, "For example, Ohel
13 teaches that when interrupted by a dispatcher transmitting
14 over the APCO transceiver, an officer's Unit 1 would
15 immediately start recording all information received by
16 the CDMA Transceiver 5 from the point in time the APCO
17 Transceiver 7 took over." Is that right?

18 A. That's what it says.

19 Q. This makes sense -- or sorry. CDMA is
20 where the officer would be talking to another individual
21 in Ohel's example; right?

22 A. Another officer.

23 Q. And this recording of information makes
24 sense because it's interrupting the officer's discussion
25 on the CDMA transceiver; right?

Page 81

1 MR. STAVINOHA: Objection. Form.

2 A. I mean, the word makes -- term makes sense
3 is kind of subjective. I mean, I'm not seeing any
4 illogic to it.

5 Q. (By Mr. Kantarek) Right. I mean, you are
6 the subject. I'm just wondering if it makes sense to you,
7 so it sounds like it does.

8 And at the end of that paragraph, you say,
9 "Therefore, it would be understood by a POSITA that the
10 disclosed method applies to all messages sent or received
11 by the unit and that each of the individual units are part
12 of an overall communication system."

13 Do you see that?

14 A. Yes.

15 Q. So this says, "A POSITA would understand
16 that the disclosed method records all messages sent or
17 received by the unit"?

18 MR. STAVINOHA: Objection. Form.

19 A. I'm sorry, repeat the question.

20 Q. (By Mr. Kantarek) So this says "A POSITA
21 would understand that the disclosed method records all
22 messages sent or received by the unit."

23 A. Right.

24 MR. KANTAREK: And I'm sorry, just an
25 aside to the court reporter, it's -- the word is POSITA,

Page 82

1 it's P-O-S-I-T-A. It's an acronym for person more
2 skilled in the art, if that helped.

3 Q. (By Mr. Kantarek) Mr. Williams, if you can
4 move to the next page. This is Page 94 on the footer of
5 Exhibit 1002. Pointing you -- I'm sorry. We're actually
6 going to go to 1E, which is Page 96 in the footer of
7 Exhibit 1002. And you can see Section F has Limitation
8 1E. Do you see that?

9 A. Yes.

10 Q. And Limitation 1E is "Playing the message
11 having a higher priority between the first and the second
12 message."

13 Do you see that?

14 A. Yes.

15 Q. In Paragraph 147, you identify this as a
16 superior user interruption; right?

17 MR. STAVINOHA: Objection. Form.

18 A. You are stating it as a noun. It phrases
19 it as a transmission will be interrupted, for example, by
20 a superior user such as a dispatcher.

21 Q. (By Mr. Kantarek) Sorry. I'm just
22 wondering if you are saying -- strike that.

23 So your opinion is that Ohel renders
24 obvious Element 1E by its disclosure of a superior user
25 interrupting a lower priority transmission; right?

Page 83

1 MR. STAVINOHA: Objection. Form.

2 A. It discloses playing a message having a
3 higher priority, and it describes two ways of doing
4 priority. One is the superior user status. The other is
5 essentially the chronological who-came-first priority.

6 Q. (By Mr. Kantarek) Well, what you actually
7 say at the bottom of Paragraph 147 is "If the overlapping
8 messages have the same priority, the messages are played
9 chronologically without interrupting the first message";
10 right?

11 A. Right.

12 Q. And the superior user interruption as we
13 talked about it, it's specifically disclosed by Ohel as a
14 priority; right?

15 MR. STAVINOHA: Objection. Form.

16 A. That's what I'm saying, disclosed is that
17 through its steps associated, in particular in its Figure
18 1 with Step 500 is the superior transmission involved.

19 Q. (By Mr. Kantarek) Sorry. Where in
20 paragraph --

21 A. 500.

22 Q. -- 146 through 148 do you talk about
23 Element 500?

24 A. Oh. I see. It refers to paragraph -- to
25 Paragraph 47 and 47 refers to Step 500.

1 Q. I see.

2 Got it.

3 This is -- this is overtalk, right, where a
4 superior user cuts out lower priority user's transmission?

5 MR. STAVINOHA: Objection. Form.

6 A. Well, we had the discussion about the
7 scope of overtalk before. I think it's fair to say that
8 if a dispatcher is interrupting another user's
9 transmission, that that would be a form or flavor of
10 overtalk.

11 Q. (By Mr. Kantarek) Moving to Claim 3. This
12 is going to be Paragraph 165 through 166, which is pages
13 106 through 107 of Exhibit 1002. If you can let me know
14 when you are there.

15 And for the record, I'm just going to start
16 using the numbers in the footer so I don't have to say in
17 the footer every time if that works for you, Mr. Williams.

18 A. That's fine. I'm sorry, which -- now
19 which page again?

20 Q. So Page 106 to 107. Starting at Claim 3
21 which is Header 3.

22 A. Okay.

23 Q. So Claim 3 says "The method of Claim 1
24 wherein the predefined parameter comprises a bandwidth
25 requirement of the received messages."

Page 85

1 Do you see that?

2 A. Yes.

3 Q. And in Paragraph 165, you talk about APCO
4 transmissions being prioritized over CDMA transmissions;
5 right?

6 A. Yes.

7 Q. And you cite Paragraph 70 of Ohel; correct?

8 A. Yes.

9 Q. So if you can open up Ohel, which is
10 Exhibit 1004, at Paragraph 70. Let me know when you are
11 there.

12 A. I'm there.

13 Q. Okay. So this says, in the first line, "In
14 the first of the scenarios if the predefined protocol has
15 been defined to force the officer to immediately listen to
16 the dispatcher, then all communications over the user's
17 CDMA Transceiver 5 would be preempted by the user's APCO
18 Transceiver 7."

19 Do you see that?

20 A. Yes.

21 Q. So this is the priority based on superior
22 user status we talked about before; right?

23 MR. STAVINOHA: Objection. Form.

24 A. Yes.

25 Q. (By Mr. Kantarek) And if you go down to

1 Paragraph 166, you say a post -- this is the third line of
2 Paragraph 166. It says, "A POSITA would have understood
3 different types of digital data all have different
4 bandwidth requirements that would be appropriate to use as
5 predefined parameters when defining the protocol -- the
6 priority protocol."

7 Do you see that?

8 A. Yes.

9 Q. So here you are saying that a POSITA would
10 understand that a type of radio message is the same as a
11 bandwidth requirement?

12 MR. STAVINOHA: Objection. Form.

13 A. Types of digital data.

14 Q. (By Mr. Kantarek) You are saying a POSITA
15 would understand that types of digital data are the same
16 as a bandwidth requirement?

17 MR. STAVINOHA: Objection. Form.

18 A. I say a POSITA would understand that
19 different types of digital data would have different
20 bandwidth requirements that would be appropriate to use
21 as predefined parameters.

22 Q. (By Mr. Kantarek) Right. So my question,
23 I guess, was a little bit different.

24 You are saying a POSITA would understand
25 that a different type of digital data is the -- is a

Page 87

1 bandwidth requirement?

2 MR. STAVINOHA: Objection. Form.

3 A. I mean, you are kind of rephrasing the
4 sentence to give it potentially a different meaning. I
5 mean, what I've got here is what I mean. Instead of
6 paraphrasing, a POSITA would have understand that these
7 different types of digital data have different bandwidth
8 requirements.

9 And before that, the sentence before that
10 says, "Wireless transmission can be digital data, but not
11 limited to code, audio signal, an image or video stream"
12 and thus connecting the two together, a POSITA would
13 recognize that the code versus audio signal versus an
14 image versus a video stream could have different
15 bandwidth requirements.

16 Q. (By Mr. Kantarek) And is a radio message a
17 type of digital data?

18 A. A radio -- the digital data as I describe
19 here is including but not limited to code, audio signal,
20 an image or video stream. Any and all those can take the
21 form of -- under the -- potentially take the form of a
22 radio message.

23 Q. So a radio message could be a type of
24 digital data.

25 A. A radio message could contain digital data

1 in the right conditions. And not -- and actually --
2 actually that's not even necessarily true. More that I
3 think about it, limited bandwidth of -- like APCO is for
4 audio signals and can't accommodate other higher
5 intensity bandwidth.

6 Q. So is an audio signal a type of radio
7 message?

8 A. Yes, and that is actually the point of
9 Claim 5.

10 Q. So let me take you to -- do you have -- if
11 you can look to the '802 patent, which is Exhibit 1001.
12 If you could go to Column 4, Line 58. Let me know when
13 you are there.

14 A. Yes.

15 Q. So here it says, "The predefined parameter
16 can be, for example, the type of radio messages, the size
17 of the radio messages, the bandwidth requirement, the
18 channel from which the radio message" -- strike that
19 thought. Sorry. I will just start over.

20 "The predefined parameter can be, for
21 example, the type of radio messages, the size of the radio
22 messages, the bandwidth requirement, the channel from
23 which radio messages are received, or any possible
24 combination thereof."

25 Do you see that?

1 A. Yes.

2 Q. So is it your opinion that bandwidth
3 requirement and type of radio messages are the same?

4 A. No.

5 MR. STAVINOHA: Objection. Form.

6 Q. (By Mr. Kantarek) You don't think that a
7 type of radio message and a bandwidth requirement are
8 identical?

9 A. No. If you -- if you get a message that
10 is -- just contains a lot of audio data and versus
11 another message that just says yes or no, that's going to
12 be a different amount of information.

13 Q. A different amount of bandwidth?

14 A. And different amount of bandwidth.

15 Q. Let's move to Claim 6, which is on Page 109
16 of Exhibit 1002 or it starts there.

17 A. Okay.

18 Q. So Claim 6 claims "The method of Claim 1
19 wherein determining the priority comprises assigning
20 priorities to the first message and the second message
21 based on inputs from a user."

22 Do you see that?

23 A. Yes.

24 Q. And here, if you go to Paragraph 176 and
25 177, your opinion is that the user claimed in Claim 6 is

Page 90

1 the dispatcher; is that right?

2 MR. STAVINOHA: Objection. Form.

3 A. The best way I can answer is to read
4 Paragraph 176.

5 Q. So -- so sorry. Who -- so in Claim 6 at
6 the end it says, "based on input from a user." You see
7 that; right?

8 A. Yes.

9 Q. So who is the user you've identified from
10 Ohel in this section of your opinion?

11 A. It says, "e.g., the dispatcher."

12 Q. And as we talked about with respect to
13 Claim 1, Ohel's dispatcher was a first entity or a second
14 entity too; right?

15 A. Correct. Could be.

16 Q. So in Paragraph 177, your position is that
17 the use of a "Predefined protocol is something based
18 on" -- it satisfies the claim language based on user
19 inputs; right?

20 MR. STAVINOHA: Objection. Form.

21 A. I'm sorry, I don't understand the
22 question.

23 Q. (By Mr. Kantarek) So we talked about the
24 claim itself. "Claims: The method of Claim 1 wherein
25 determining the priority comprises assigning priorities to

Page 91

1 the first message and the second message based on inputs
2 from the user"; right?

3 A. Right.

4 Q. And you are saying in Paragraph 177 that
5 the use of a predefined protocol to determine priorities
6 satisfies this based on user inputs claim language; right?

7 MR. STAVINOHA: Objection. Form.

8 A. As I state in 177, the POSITA would have
9 understood that in the context of Ohel's
10 computer-implemented system, the predefined protocol used
11 to assign priorities would be based on user inputs. So
12 that's the linkage.

13 Q. (By Mr. Kantarek) So it sounds like your
14 answer is yes.

15 And sorry, I don't --

16 MR. STAVINOHA: Objection. Form.

17 Q. (By Mr. Kantarek) -- mean to input that
18 in. I'm just -- I'm just saying you could -- you could
19 listen to my question and answer it instead of reading
20 sometimes.

21 But -- so if we go to -- and if we stay on
22 Paragraph 177, the user input -- based on user inputs
23 would be based on dispatcher inputs; right? In your
24 reading.

25 MR. STAVINOHA: Objection. Form.

1 A. That's one of the mechanisms that -- or
2 embodiments of a user input, e.g., by the dispatcher.

3 Q. (By Mr. Kantarek) We talked a little bit
4 about in Claim 1 a predefined -- sorry. Strike that.

5 We talked about in Claim 1 the term
6 "predefined parameter"; right? Do you remember that?

7 A. Yes.

8 Q. What's the difference between a predefined
9 parameter and a predefined protocol?

10 MR. STAVINOHA: Objection. Form.

11 A. I would have to go back and look at that.
12 I'm -- I don't recall off the top of my head whether it's
13 protocols of an example of the parameter or what. I just
14 don't recall at this point.

15 Q. (By Mr. Kantarek) Well, I guess -- I guess
16 taking a step back. Predefined parameter is a claim term,
17 and predefined protocol is a quote -- is a term used in
18 Ohel; correct?

19 A. Correct.

20 Q. So I'm trying to understand what the
21 difference is between predefined parameter as claimed in
22 the '802 patent and predefined protocol as disclosed in
23 Ohel?

24 A. I think particularly in Paragraph 177,
25 they are effectively the same.

1 Q. So in Ohel, Paragraph 70 that talks about
2 this predefined protocol, who in -- what does Ohel teach a
3 POSITA about who defines the predefined protocol?

4 A. I would have to go back to Ohel. I don't
5 recall anything off the top of my head about who does
6 that.

7 Q. In reviewing Paragraphs 175 through 178 of
8 your declaration, you don't include any disclosure about
9 who defines the predefined protocol in Ohel?

10 MR. STAVINOH: Objection. Form.

11 A. Actually, there is. In Paragraph 177, for
12 example, "User input would be involved in defining of the
13 protocol such as choosing between a predefined protocol
14 that forces the officer to immediately listen to the
15 dispatcher or a predefined protocol that has been defined
16 not to force the officer to immediately listen to the
17 dispatcher."

18 Q. (By Mr. Kantarek) So a user encompasses
19 people who set protocols for Ohel's system?

20 A. I would have to analyze that for all
21 different permutations and ramifications.

22 Q. Well, the claim language says, based on
23 inputs from a user. You are saying in your declaration
24 user input would be involved in defining the protocol.

25 So my question is: Your understanding of

1 user includes people who set protocols for Ohel's system;
2 right?

3 MR. STAVINOHA: Objection. Form.

4 A. Again, I would have to go back and look
5 at -- think about that question in more detail.

6 Q. (By Mr. Kantarek) So sitting here today,
7 you can't tell me one way or the other whether the use of
8 the term "user" in Claim 6 includes people setting
9 protocols for Ohel system?

10 A. I can't -- sitting here today, I can't
11 define the scope or metes and bounds of who those users
12 might be.

13 Q. So if he can turn to the next page. This
14 is Claim 7, Paragraph 180. Claim 7 states "The method of
15 Claim 1 further comprising in forming an operator of the
16 time of receipt of a message while playing the first
17 message and the second message."

18 Do you see that?

19 A. Yes.

20 Q. And in Paragraph 180, you discuss Ohel's
21 time stamp, right?

22 A. Yes.

23 Q. And you say that "The time stamp is a flag
24 when a superior user's transmission is detected and
25 started interrupting the user's transmission"; right?

Page 95

1 A. You paraphrased, but the time stamp is a
2 flag at the point in time when a superior user's
3 transmission is detected, which indicates the point in
4 time during the user's transmission at which the superior
5 user's transmission started interrupting the user's
6 transmission.

7 Q. And so the operator of Claim 7 is the
8 dispatcher of Ohel; is that right?

9 MR. STAVINOHA: Objection. Form.

10 A. It can be. It can also be the police
11 officer.

12 Q. (By Mr. Kantarek) So your opinion is that
13 Ohel renders Claim 7 obvious by informing a dispatcher the
14 time of receipt of a message while playing the first
15 message and the second message, or informing a police
16 officer of the time of receipt of a message while playing
17 the first message and the second message; is that right?

18 MR. STAVINOHA: Objection. Form.

19 A. Depending on the embodiment.

20 Q. (By Mr. Kantarek) Sorry. So that's a yes,
21 depending on the embodiment?

22 A. It depends on the embodiment.

23 Q. Got it.

24 In Paragraph 180, when you quote Ohel, it
25 talks about a superior user on one hand and a user on the

1 other; right?

2 A. Yes.

3 Q. And in Ohel, the superior user is a
4 dispatcher and the user is a police officer in this
5 example; right?

6 A. I think that's accurate.

7 Q. And so moving to Paragraph 181, you put in
8 Figure 2. Do you see that? That's on the next page, on
9 Page 112.

10 A. Yes.

11 Q. So Figure 2 includes Display 13. And
12 Figure 2 is a User Communication Unit 1; correct?

13 A. Correct.

14 Q. And the user is a police officer, I
15 believe; right?

16 A. In this context, the user is also a police
17 officer.

18 Q. Sorry. In this context, the user is a
19 police officer --

20 A. The user -- the user is a police officer.

21 Q. And if you look at Paragraph 68 of Ohel,
22 this says, "A user is a police officer. The officer can
23 communicate with other individuals or entities via cell
24 phone using any of the three cell phone transceivers, 4, 5
25 or 6, for example."

Page 97

1 Do you see that?

2 A. Yes.

3 Q. And this further talks about, the next
4 sentence, "Communication with the police dispatcher can
5 take place, for example, over one of the public safety
6 transceivers 7 of 8 or by radio through one of the simplex
7 transceiver units 2, 3"; right?

8 A. That's what it says.

9 Q. Now, the display of Figure 2, this is --
10 this is something in this example that would be in front
11 of a police officer; right?

12 A. Or accessible to them, yeah.

13 Q. So I guess I'm trying to understand your
14 evidence. If Figure 2 shows a display for a police
15 officer, where is -- where in these paragraphs is your
16 evidence that this display informs an operator of a time
17 of receipt of message?

18 A. Well, I state in Paragraph 182, it would
19 be obvious to a POSITA in view of Ohel to inform the
20 operator the time of receipt of a message, e.g., time
21 stamp while playing the first and second message.

22 Q. So it's not your position that Ohel
23 discloses this limitation. It's that it renders it
24 obvious; right?

25 MR. STAVINOH: Objection. Form.

Page 98

1 A. Well, in paragraph -- the last sentence
2 on Page 112, which is the end of 181, talks about the --
3 actually, the last two sentences describe, you know,
4 using the display for performing various functions with
5 the last sentence saying, "For example, if audio
6 information is being played with regards to the active
7 display in 14, then the following functions would be
8 useful, play, stop, rewind, fast-forward, pause, record
9 and go to a specified time stamp."

10 So it does -- it references specifically
11 time stamp.

12 Q. (By Mr. Kantarek) So I guess I will go
13 back to my other question, then, you are talking about it
14 referencing time stamp. We -- we talked about how this
15 display is in front of an officer or accessible to one;
16 right?

17 A. Yes.

18 Q. And so my question again is: Where in
19 these paragraphs is your evidence that this display
20 informs an operator of the time of receipt of a message?

21 A. It's -- it's -- it's -- it's an
22 obviousness argument as I state in page -- in
23 Paragraph 182. Time stamp being, from a POSITA
24 standpoint, a central piece of information or metadata
25 associated with reporting messages as well as playing

1 them back.

2 And so to me it would be obvious and will
3 help clearly disclose this, the capturing of time stamp
4 and the use of it in -- with respect to playing messages.
5 So to me there's no leap in logic.

6 Q. So if this display is in front of or
7 accessible to -- in front of or accessible to an officer,
8 and they give a time stamp when the officer's transmission
9 has been interrupted, I understand why an officer would
10 want to be informed of that.

11 Why would an operator or a dispatcher of
12 Ohel need to be told when it interrupted an officer's
13 other transmission?

14 MR. STAVINOH: Objection. Form.

15 A. I haven't done specifically that analysis,
16 but it would seem to be a reasonable thing to do in terms
17 of particularly a dispatcher having a lot of things going
18 on and wanting to know or be reminded when they did
19 something. It doesn't seem -- it doesn't seem
20 unreasonable.

21 Q. (By Mr. Kantarek) So let's go to Claim 11.

22 A. In?

23 Q. And that is page -- oh, sorry.

24 A. I need a break at some point.

25 Q. I was about to say. Yeah, I see where --

Page 100

1 you are absolutely right. Would you like to take a short
2 break?

3 A. Yeah.

4 Q. Good idea.

5 THE DEPONENT: Ten minutes.

6 MR. KANTAREK: Ten minutes? You got it.

7 See you at 2:05 Central.

8 MR. STAVINOHA: Sounds good.

9 THE COURT REPORTER: We're off the record.

10 (Recess 12:56 p.m. to 1:09 p.m.)

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

13 Q. (By Mr. Kantarek) Welcome back,
14 Mr. Williams. Can I get you to turn to Page 43 of your
15 declaration, please. I'm sorry, 42. It's Exhibit 1002.

16 A. 42 of the declaration?

17 Q. That's correct. Yep.

18 A. Okay.

19 Q. You see about -- yes, that's right. You
20 see the 11H element?

21 A. Yes.

22 Q. So that says "Playing a stored message
23 having the highest priority."

24 Do you see that?

25 A. Versus plying.

Page 101

1 Q. Oh, is it -- no, sorry. Is it a typo? No.
2 Playing I think, right?

3 A. Yeah. I -- one of the typos is --

4 Q. Oh.

5 A. -- in --

6 Q. In another spot maybe? Well, I will see if
7 I can -- no, I'm not worried about that.

8 So you see 11H where it says "Playing the
9 stored message having the highest priority"?

10 A. Yes.

11 Q. And then if you turn back a page. If you
12 look at 1G, and it says "Playing the stored message
13 subsequent to completing playing of the message having
14 higher priority."

15 Do you see that?

16 A. Yes.

17 Q. Are those the same?

18 A. I haven't specifically analyzed that.
19 Those are both independent claims.

20 Q. Sorry. You haven't analyzed whether one --

21 A. I haven't cross-compared those because
22 they're both independent claims. So I can't answer off
23 the top of my head.

24 Q. Well, this isn't off the top of your head.
25 This is -- I'm showing you Element 1G and I'm showing you

1 Element 11H, and I'm asking you if those claim elements
2 are the same.

3 A. 1G versus 11H; right?

4 Q. Yeah. Are elements 11H and 1G the same?

5 A. No, not exactly the same.

6 Q. And taking you to the Page 117 of your
7 declaration, which is Exhibit 1002. The header here
8 recites text of Claim 11 and at the bottom of the bolded
9 message right above Paragraph 193, it lists Element 11H
10 which is "Playing the stored message having the highest
11 priority"; right?

12 A. You've lost me. Sorry.

13 Q. Sure. So we were just talking about
14 limitation 11H; correct?

15 A. Yes.

16 Q. And so then I directed you to Page 117 in
17 which you list all elements of Claim 11. And I'm saying
18 at the end of the bolded text, it lists Element 11H which
19 is "Playing the stored message having highest priority";
20 right?

21 A. Yes.

22 Q. And if you go down to Paragraph 193, you
23 say "Claim 11 is nearly identical to Claim 1 with only a
24 few minor differences." And then you list the
25 differences.

1 A. Yes.

2 Q. "First Claim 1 recites prioritizing the
3 first and second messages based on at least one predefined
4 parameter instead of" -- sorry, Court Reporter --
5 "determining one or more priorities for the first message
6 received on the first dedicated channel from the first
7 entity, and the second message received on the second
8 dedicated channel from the second entity based on at least
9 one predefined parameter."

10 Do you see that?

11 A. Yes.

12 Q. That's not Element 1H -- or 11H; right?

13 A. Correct.

14 Q. You say, "Second, Claim 11 recites storing
15 the message having lower priority in a queue."

16 Do you see that?

17 A. Yes.

18 Q. And that's not Element 11H?

19 A. Correct.

20 Q. And then the third, Claim 11, recites
21 "Checking periodically the status of the message being
22 played."

23 Do you see that?

24 A. Yes.

25 Q. That's not Claim 11 -- that's not Element

1 11H either, is it?

2 A. Correct.

3 Q. So in Paragraph 193, you talk about
4 differences between Claim 11 and Claim 1, but you don't
5 mention Element 11H; is that right?

6 A. That's correct.

7 Q. So taking you to Claim 13, which is on
8 Page 120, the end -- excuse me. The end of the header for
9 Number 13, which --

10 A. I'm sorry. I -- I missed the page.

11 Q. That's okay. It's Page 120.

12 A. Okay.

13 Q. The last -- the last phrase or claim
14 element after the last semicolon in the bolded text says
15 "Means for storing the messages other than the one sent
16 for playing in a queue based upon the associated
17 priority"; right?

18 A. That's what it says.

19 Q. And then Paragraph 291 of your declaration,
20 which is Page 176. You can let me know when you are
21 there.

22 A. 291 paragraph in Page 176. Okay.

23 Q. It says, "A queue can take various forms,
24 but any queue is essentially multiple data elements stored
25 in some sort of sequence for later use which is based in

Page 105

1 some form on that stored sequence."

2 Do you see that?

3 A. Yes.

4 Q. So you put items in queues to remember the
5 order; right?

6 A. To use for that -- potentially for that
7 purpose.

8 Q. Well, you say "stored in some sort of
9 sequence for a later use" which is based in some form on
10 that stored sequence; right?

11 A. Correct.

12 Q. So --

13 MR. STAVINOHA: Objection. Form.

14 Q. (By Mr. Kantarek) So that's -- that means
15 the order in which they are part of -- the elements are
16 part of the queue is part of the reason to use a queue;
17 right?

18 MR. STAVINOHA: Objection. Form.

19 Q. (By Mr. Kantarek) Strike that. That was a
20 terrible question.

21 In a queue --

22 A. Did you see my blank look?

23 Q. In a queue -- order matters in a queue;
24 right?

25 MR. STAVINOHA: Objection. Form.

1 A. It can.

2 Q. (By Mr. Kantarek) But you -- in your -- in
3 Paragraph 291, you say, "The sequence is based on the
4 stored sequence and it's stored in a sequence for later
5 use."

6 A. Based in some form on that stored
7 sequence.

8 Q. And so let me take you back to Claim 20,
9 and I will help -- and we should probably finish that out
10 before I go to Nigawara. This is Page 134 of your
11 declaration.

12 A. Okay.

13 Q. This is Claim 20. It says "The method of
14 Claim 1 wherein playing the message comprises playing the
15 message having a higher priority between the first and
16 second message without storing the message having the
17 higher priority if no other message is being played";
18 right?

19 A. Right.

20 Q. And in Ohel, which is Exhibit 1004,
21 Paragraph 42, this says "With the present invention, a
22 user has the ability to preserve all" -- I'm sorry.
23 Strike that.

24 It's the end of Paragraph 42. It says "The
25 invention also permits the user to play back any

Page 107

1 conversation including the user's current conversation."

2 Do you see that?

3 A. Yes.

4 Q. In order to permit playback of a message,
5 it stores the message; right?

6 MR. STAVINOHA: Objection. Form.

7 A. It can or it can just be playing the
8 current conversation real time.

9 Q. (By Mr. Kantarek) So playing the current
10 conversation real time is the same as playing back a
11 conversation, in your opinion?

12 MR. STAVINOHA: Objection. Form.

13 A. Well, playing the current conversation
14 means -- can mean real time. If you phrase it
15 differently, you know, play the current conversation at a
16 later time, then that's a different thing.

17 Q. (By Mr. Kantarek) So the phrasing I'm
18 talking about is the phrasing at the end of Paragraph 42
19 of Ohel, where it says "The invention also permits the
20 user to play back any conversation including the user's
21 current conversation."

22 So if -- if -- so your -- but your position
23 is playing the current conversation in real time is the
24 same as playing back the conversation?

25 MR. STAVINOHA: Objection. Form.

Page 108

1 A. No, I mean, it -- it's kind of a --
2 ambiguous -- a little ambiguous. But it's playing the
3 current conversation in real time would not require
4 storing. Playing the current conversation at a later
5 time would require storing.

6 Q. (By Mr. Kantarek) And playing back a
7 conversation, is that playing at a later time or playing
8 in real time?

9 A. If you are playing back a conversation and
10 the conversation has already taken place in the past,
11 then that didn't -- then that's not real time. That has
12 been stored.

13 Q. So if you look at Paragraph 222 of your
14 declaration, this discusses storing a lower priority
15 communication; right?

16 A. Right.

17 Q. And Paragraph 223 talks about -- in the
18 first sentence it says "If no higher priority transmission
19 interrupts the first message, the transmission is played
20 but not recorded."

21 Do you see that?

22 A. Right.

23 Q. You don't have a cite to Ohel for that
24 proposition; correct?

25 A. It cites to Paragraph 51, but

1 Paragraph 224 says it discloses or at least renders
2 obvious. In my mind, the disclosures in 221 to 223
3 certainly render that obvious with its discussion of if
4 no higher priority transmission interrupts the first
5 message, the transmission is played and not -- and is not
6 recorded. I mean, that just makes reasonable sense in
7 terms of not recording an unnecessary transmission if
8 nothing else is interrupting it.

9 Q. Would it make reasonable sense if Ohel
10 expressly discloses the opposite?

11 MR. STAVINOHHA: Objection. Form.

12 A. I would have to think about that one.
13 I --

14 Q. (By Mr. Kantarek) So if a POSITA reading
15 Ohel is told the opposite of a proposition, you are not
16 sure whether that proposition would make reasonable sense
17 to a POSITA?

18 MR. STAVINOHHA: Objection. Form.

19 A. Well, it -- it potentially changes the
20 whole philosophy and design of Ohel in terms of --
21 because there's -- you are looking at Figure 1, multiple
22 recorded transmission steps or decisions about recording
23 transmissions. So he suddenly changed the philosophy of
24 how the whole system works, then this design is going to
25 kind of -- is potentially completely upended, and I'm not

1 going to analyze that on the fly.

2 Q. (By Mr. Kantarek) So my question is a
3 little different. You are saying storing the message
4 having the higher priority -- or without -- you are saying
5 not storing the message having the higher priority if no
6 other message is being played is obvious based on Ohel;
7 right?

8 A. Ohel is a multichannel data recorder for
9 the purpose -- for core purpose in terms of -- of not --
10 not losing any transmission if multiple transmissions are
11 going on. If you have a single transmission coming in,
12 you -- there's -- it -- that's not necessarily recording
13 it. Regardless of whether there's something else,
14 doesn't necessarily fit with the overall purpose of Ohel.

15 So a POSITA would reasonably -- have a
16 reasonable expectation that in that kind of circumstance,
17 the transmission would not be recorded if nothing else is
18 competing with it.

19 Q. Even if Ohel says the invention permits the
20 user to play back any conversation including the user's
21 current conversation.

22 MR. STAVINOH: Objection. Form.

23 A. Again, that's -- the core purpose is
24 around the multichannel data recorder. And as I -- we
25 discussed at the front end of this, the phrasing is such

Page 111

1 that I'm -- to me it supports the embodiment that if
2 there's no other message coming in at the time of another
3 message, there's not necessarily any reason to record
4 that message.

5 Q. (By Mr. Kantarek) Okay. Let's move on to
6 Nigawara. That's Exhibit 1007 in this proceeding. You
7 can put away Ohel if...

8 So do you have Nigawara in front of you?
9 (Exhibit Number 1007 was marked.)

10 A. What exhibit is it?

11 Q. It's 1007.

12 A. Yes.

13 Q. At the beginning of Nigawara, at Column 1,
14 Line 6, it says "This invention relates to a method and
15 system for announcing by voice messages the operating
16 conditions of a plant, such as a thermal power plant or
17 announcing a change or changes in the operating conditions
18 of such a plant and more particularly to an announcing
19 method and system suitable for application to a plant
20 where a plurality of voice message announcing devices are
21 provided."

22 Do you see that?

23 A. That was the -- answer it?

24 Q. No. That was Column 1, Line 16 --

25 A. Oh, sorry. I was --

Page 112

1 Q. That's okay.

2 A. Yes.

3 Q. And if you go down to Line 17 of Column 1,
4 it says, "According to the disclosed device, various" --
5 sorry, let me start at the beginning of that paragraph
6 because it's a little misleading if I start in the middle.

7 So this is Line 14 of Column 1 of
8 Exhibit 1007. "A prior art device for announcing the
9 operating conditions of a plant, such as a thermal power
10 plant by voice messages is disclosed in, for example" --
11 Japanese patent numbers. "According to the disclosed
12 device, various process variables indicating the operating
13 conditions of the plant are detected and when occurrence
14 of an abnormal operating condition is detected, it is
15 automatically announced by a voice message or when a
16 change in the operating conditions is detected, it is also
17 announced by a voice message. So that operators working
18 in the plant can be immediately informed of the occurrence
19 of the abnormal operating conditions or the change in the
20 operating condition."

21 Do you see that?

22 A. Yep.

23 Q. So this prior -- prior art device in
24 Nigawara's use of the term "operators," what is your
25 understanding of an operator -- of what an operator is in

Page 113

1 the background of the invention?

2 A. Well, in this context, it -- I'm not a
3 thermal power plant expert by any stretch, but to me it
4 would refer to the people at their various stations
5 throughout the plant that are operating various parts of
6 the overall plant.

7 Q. So this -- these operators are different
8 than the operator of the '802 patent, for instance; right?

9 MR. STAVINOHA: Objection. Form.

10 A. Well, it's a -- it's a -- you know, a -- I
11 don't think the '802 patent has a thermal power plant
12 context, per se. So they are different in that respect.

13 Q. (By Mr. Kantarek) They are different than
14 the -- go ahead.

15 A. But it's -- they're still worried and
16 having to deal with emergency messages. And so in that
17 respect, they are similar.

18 Q. They don't perform the same function as the
19 dispatcher in the '802 patent; right?

20 A. I think it's safe to say that a police
21 communications department is a little different than a
22 thermal power plant operation but I also think they both
23 have to do or -- with emergency communications.

24 Q. So if you look down to the next paragraph,
25 this is still Column 1, now we're at Line 26. It says,

Page 114

1 "Practically it is required to provide an independent
2 voice message announcing device for each of the individual
3 suitably divided units of the plant. When these voice
4 message announcing devices operate independently of one
5 another, voice messages pertaining to different operating
6 conditions are announced simultaneously due to the absence
7 of operational harmony among these devices.

8 "Consequently a problem has arisen in which
9 the announced voice messages mix with one another to an
10 extent that individual voice messages cannot be
11 distinguished from one another by the operators."

12 Do you see that?

13 A. Yep.

14 Q. So this -- and Lines 27 through 37 is a
15 problem that Nigawara is trying to solve; right?

16 A. "This" being, what are you referring to?

17 Q. The disclosure at Column 1, Lines 27
18 through 37 describes a problem that Nigawara seeks to
19 solve; right?

20 A. Yes. Typically the potential for multiple
21 messages being announced simultaneously or over a -- on
22 top of each other.

23 Q. Right. Where it says a problem has arisen
24 in which the announced voice messages mix with one another
25 to the extent -- to an extent that the individual voice

Page 115

1 messages cannot be distinguished from one another by the
2 operators; right?

3 A. Right.

4 Q. And so if you look down to Line 40, which
5 is the next paragraph. Under Summary of the Invention it
6 says, "With a view to solving the prior art problem
7 described above, it is a primary object of the present
8 invention to provide an automatic voice message announcing
9 method and system for use in a plant such as a thermal
10 power plant for sequentially announcing voice messages
11 pertaining to different operating conditions without the
12 possibility of intermixing messages even when a plurality
13 of voice message announcing devices are provided in the
14 plant"; right?

15 A. Right.

16 Q. So that's how it proposes to solve this
17 problem?

18 A. Yeah. It's the setup to it, yeah.

19 Q. All right. So if we look at Claim 11 of
20 Nigawara -- Claim 11 of the '802 patent in Round 2, which
21 is based on Nigawara. That's paragraph -- starting at
22 Paragraph 290 of your declaration, which is Page 175.

23 A. Okay.

24 Q. And at the bottom of Claim 11 text it again
25 shows Element 11H that we talked about before, and that's

Page 116

1 playing the stored messages having the highest priority;
2 right?

3 A. That's the last part of Claim 11.

4 Q. And Paragraph 290 discusses differences
5 between Claim 11 and Claim 1, but does not mention Element
6 11H; right?

7 A. That's correct.

8 Q. So if we go to Claim 1 within the Nigawara
9 ground, which is -- starts at Paragraph 237. Sorry.
10 This -- or Claim 1 starts with -- I will direct you to
11 Paragraph 237 which is Page 141 of your declaration. This
12 shows Element 1A, which we talked about in the context of
13 Ohel; right?

14 A. Right.

15 Q. In Paragraph 237, you state that the
16 claimed first message is information signal 5; right?

17 A. On the first dedicated channel for
18 Plant A.

19 Q. Sorry. I -- I saw you nodding, but I can't
20 pick up a nod. Was your answer a yes? If you could just
21 verbalize it --

22 A. I was talking, so I don't -- Nigawara
23 discloses --

24 Q. I will just ask another question. We will
25 just get it clean.

Page 117

1 A. Okay.

2 Q. In Paragraph 237, your identification for
3 the claimed first message, you identify Nigawara's
4 information signal 5 as disclosing that element; right?

5 A. To be complete, it would be information
6 signal 5 on a first dedicated channel. Units 1 and 2
7 provided for Plant A.

8 Q. Right. So those are two terms. I was
9 asking about the first message term.

10 A. Yeah.

11 Q. So the first message you identify in
12 Nigawara is information signal 5; right?

13 A. One of them. Yes.

14 Q. What are the other first messages you
15 identify in Nigawara?

16 A. I'm not identifying other first messages.
17 I'm just -- if you look at Figure 1, there are multiple
18 number 5s. One from each plant.

19 Q. Got it. And the dedicated channel is Units
20 1 and 2 provided for Plant Site A as you just mentioned;
21 right?

22 A. Correct.

23 Q. So which of Units 1 and 2 are the dedicated
24 channel?

25 A. Collectively they form the dedicated

1 channel.

2 Q. So your position is Units 1 and 2 combine
3 to form a channel?

4 A. Yes.

5 Q. And the first -- and the claimed first
6 entity, you can see at the end of Paragraph 237, it says,
7 "The first dedicated channel being dedicated to receiving
8 messages from a first entity, e.g., Plant Site A."

9 Do you see that?

10 A. Yes.

11 Q. So you -- your position is Nigawara's
12 disclosure of Plant Site A is the claimed first entity in
13 Claim 1 of the '802 patent; right?

14 A. That's correct.

15 Q. And if we move to one -- to Element 1B,
16 which is Page 144 of your declaration.

17 A. I'm sorry, you're kind of muffling.

18 Q. I'm sorry. Maybe I'm looking away from my
19 computer where the microphone is.

20 If you can move to Element 1B, which is on
21 Page 144 of your declaration which is Exhibit 1002.

22 A. Okay.

23 Q. This -- this element -- sorry.

24 This element discusses receiving a second
25 message on a second dedicated channel being dedicated to

Page 119

1 receive messages from a second entity; right?

2 A. Yes.

3 Q. And in Paragraph 241 you identify the
4 second message as information signals 5 again; right?

5 A. Right.

6 Q. And you identify the second entity -- well,
7 you don't identify the second entity. So my question is:
8 What's the second entity in Nigawara? What's the --
9 strike that.

10 What's the second entity claimed in the
11 '802 patent Claim 1 -- strike that.

12 What element of Nigawara discloses the
13 claim -- the second entity claimed in Claim 1 of the '802
14 patent?

15 MR. STAVINOH: Objection. Form.

16 A. I believe the second entity is Plant
17 Site B.

18 Q. (By Mr. Kantarek) If we move on to 1C --
19 and I'm sorry, taking one step back to 1B. What is the
20 claimed second dedicated channel?

21 A. That would be the boxes 1 and 2 connected
22 to the information message 5 coming in from Plant Site B.

23 Q. So you are saying this -- Unit 1 and 2 are
24 the same ones you identified as the dedicated channel for
25 the first entity?

Page 120

1 A. Well, there's multiple -- there's multiple
2 channels -- if you go to Page 147, on that Figure 1, with
3 the red box, those are -- there's four sets of boxes 1
4 and 2, each one coming in from an individual plant site
5 and each one of those is the dedicated channel for that
6 plant site.

7 Q. If we go to Element 1C, which is on
8 Page 148, this element states, "Determining one or more
9 priorities for the first message received on the first
10 dedicated channel from the first entity and the second
11 message received on the second dedicated channel from the
12 second entity based on at least one predefined parameter."

13 Do you see that?

14 A. Yes.

15 Q. And in Paragraph 246, you say "Nigawara
16 determines priority 'based on the type of message output
17 signals and plant operation mode signals as shown in
18 Tables 1 and 2 shown below'"; right?

19 A. Right.

20 Q. So Table 1, it's a little cut off, but at
21 the top it says "Example of determination of priority
22 order according to contents of voice messages."

23 Do you see that?

24 A. Yes.

25 Q. And then under that it says in parenthesis

Page 121

1 "Type of message output signal 6."

2 A. Right.

3 Q. So the different priority orders in
4 Table 1, 1st through 7, those are the different types of
5 message output signal 6; is that right?

6 A. Examples of.

7 MR. STAVINOHA: Objection. Form.

8 A. Examples of.

9 Q. (By Mr. Kantarek) Those aren't -- there
10 aren't any other examples, are there?

11 A. That's the examples they listed, but they
12 specifically say they are examples.

13 Q. These are all voice messages? I'm sorry, I
14 think you answered, but I didn't hear it and I didn't see
15 it.

16 A. In Table 1, they're voice messages.

17 Q. In Table 1, all examples of contents of
18 voice messages are voice messages; right?

19 A. Yeah. Each -- each description or content
20 of message leads off with voice message announcing or
21 teaching or what have you.

22 Q. Right. So here it also calls these
23 contents of messages the type of message output signal 6;
24 right?

25 A. Yes.

1 Q. And at 136 -- sorry. At this page that
2 we're on, which is Page 150 of your declaration, Table 2
3 shows example of determination of priority order according
4 to plant operation modes provided by plant operation modes
5 signals 7; right?

6 A. Right.

7 Q. These are examples of the types of plant
8 operation mode signals that Nigawara discloses?

9 A. Right. Correct.

10 Q. There's no other discussion of priority in
11 Nigawara; right?

12 MR. STAVINOH: Objection. Form.

13 A. 248 says, "Nigawara disposes the term
14 priority of messages based on at least defined parameters
15 such as content, importance of information, and plant
16 operation conditions."

17 I would have to go back through to see if
18 there's any other indication of other priority elements,
19 but certainly Nigawara's focused on these guys.

20 Q. (By Mr. Kantarek) So sitting here today,
21 you -- sorry. Strike that.

22 You reviewed Nigawara in detail in
23 preparing your declaration; right?

24 A. Yes.

25 Q. And you reviewed it again in preparation

Page 123

1 for this deposition?

2 A. I didn't necessarily read and study every
3 single word, but I rereviewed it --

4 Q. And sitting here today, you can't recall
5 any other discussion of priority determinations in
6 Nigawara; right?

7 A. Not off the top of my head. I didn't
8 memorize it.

9 Q. If we can go to Claim 3. This is
10 Paragraph 275, which is -- sorry, it includes
11 Paragraph 275. So if you could turn to Page 166 of your
12 declaration. Near the bottom, it -- it lists the claim
13 language of Claim 3. It states, "The method of Claim 1
14 wherein the predefined parameter" --

15 THE COURT REPORTER: I'm sorry.

16 MR. KANTAREK: Oh, I apologize.

17 Q. (By Mr. Kantarek) Yeah. "The method of
18 Claim 1 wherein the predefined parameter comprises of
19 bandwidth requirement of the received messages."

20 Do you see that?

21 A. Yes.

22 Q. And in Paragraph 275, you say that
23 "Nigawara determines a priority order to eliminate
24 mishearing because of intermixture of messages"; right?

25 A. Yes.

1 Q. We talked about this a little bit earlier
2 as part of the problem and solution Nigawara discusses;
3 right?

4 A. Repeat that question.

5 Q. Oh. I was just referencing -- it's not
6 even -- it doesn't even really matter. I was just trying
7 to jog your memory. At the beginning we went through --
8 at the beginning of our Nigawara discussion, we went
9 through the problem and the proposed solution of Nigawara.

10 A. Oh. Yeah, yeah, yeah. Yes.

11 Q. I'm simply saying that -- we talked about
12 this before, that when voice message announcing systems
13 operate independently, voice messages are announced
14 simultaneously due to the absence of operational harmony
15 among the devices; right?

16 A. Right.

17 Q. And here you say in the next sentence, "The
18 issue of intermixture exists because there are a limited
19 number of speakers for announcing messages"; right?

20 A. Right.

21 Q. You don't get that from Nigawara, do you?

22 MR. STAVINOH: Objection. Form.

23 Q. (By Mr. Kantarek) And if it's helpful, you
24 can go to Column 3, Lines 33 through 39 which you --

25 A. That's what --

1 Q. Yeah. And I will just ask the question
2 again: There's no support in Column 3, Lines 33 through
3 39 that the issue of -- for the proposition that the issue
4 of intermixture exists because there are a limited number
5 of speakers for announcing messages; right?

6 MR. STAVINOHA: Objection. Form.

7 A. I don't see those words, but I think a
8 POSITA would reasonably view that as a reasonable
9 possibility. If you've got Plants A through N and you
10 only have, such as in Figure 2, only three speakers, that
11 you have a limited number of speakers.

12 Or even put differently, you -- for a
13 plant, you can't necessarily -- you don't want to
14 necessarily be blasting speakers every 4 feet kind of
15 thing. You would want to have a constraint in terms of
16 what that is. So I think it's a reasonableness from a
17 POSITA perspective.

18 Q. (By Mr. Kantarek) So you talked about
19 Figure 2. If you look at Figure 2, it actually discloses
20 any number of speakers; right?

21 A. There's a dot, dot, yeah.

22 Q. So it's not -- Figure 2 isn't limited to
23 three speakers; right?

24 A. I think that's fair. But it's -- it's
25 not -- it doesn't say, you know, Speaker 1, 2, 3N as kind

1 of a one-to-one correspondence with the plant number. So
2 I -- again, I think it would be reasonable from at least
3 a couple perspectives of -- of having a smaller number of
4 speakers with respect to the number of plants and/or
5 number of messages that potentially would come through as
6 well as the -- the logistics associated with, you know,
7 having speakers every few feet kind of thing.

8 Q. So in your opinion, a POSITA would
9 recognize the issue of intermixture exists because there
10 are a limited number of speakers.

11 How many speakers would a POSITA add to
12 avoid intermixture of messages?

13 MR. STAVINOHA: Objection. Form.

14 A. It -- I didn't do that analysis and I'm
15 not sure necessarily, but that is -- is applicable
16 typically if you are talking about the bandwidth
17 requirement. So for -- for -- if you're -- for example,
18 if you are in an airport and you have all these gates
19 packed together, you have a very limited number of
20 speakers because if you had multiple gates blasting going
21 on at the same time, it's going to be incredibly
22 distracting to everybody and potentially as well as
23 usefulness for some people because they don't care about
24 the gate three doors down. So there's a logistics
25 associated with that.

1 Similarly in a plant, you don't want to be
2 bombarding them with messages every five seconds,
3 particularly ones that -- ones that it wouldn't
4 necessarily care about. So there's a balance that would
5 need to be struck in my view as a POSITA in terms of
6 having a reasonable but limited number of speakers and
7 thus needing to have this requirement in order to -- to
8 address that reality.

9 Q. (By Mr. Kantarek) So at the beginning of
10 Nigawara, it talked about -- this is Column 1, Line 29,
11 when these voice message announcing devices operate
12 independently of one another, voice messages pertaining to
13 different operating conditions are announced
14 simultaneously due to the absence of operational harmony
15 among these devices. Consequently a problem has arisen in
16 which the announced voice messages mix with one another to
17 an extent that the individual voice messages cannot be
18 distinguished from one another by the operators; right?

19 A. Right.

20 Q. So I guess I don't understand. Wouldn't
21 more speakers increase the amount of intermixture?

22 MR. STAVINOH: Objection. Form.

23 A. Potentially. I'm not sure I was
24 advocating more speakers.

25 Q. (By Mr. Kantarek) Well, you said the issue

1 of intermixture exists because there are a limited number
2 of speakers. So if you had an unlimited number of
3 speakers, you would have more intermixture?

4 A. Yeah. You would have -- you would have --
5 yeah. I'm not sure -- well, I certainly didn't mean that
6 more speakers would reduce the need for intermixing. In
7 fact, it might be the opposite just depending on the
8 logistics of it. So I didn't mean to say that if that's
9 what you heard.

10 Q. (By Mr. Kantarek) We can go to Claim 4,
11 which is on Page 167 which we're already at.

12 THE DEPONENT: And I need a break here.

13 MR. KANTAREK: Oh, actually, yes. Sorry,
14 again, you are right. Let's take -- how about ten
15 minutes?

16 THE DEPONENT: Yep.

17 MR. KANTAREK: All right. 3:07 Central.

18 THE DEPONENT: Yep.

19 THE COURT REPORTER: We're off the record.
20 (Recess from 1:58 p.m. to 2:09 p.m.)

21 THE COURT REPORTER: We're back on the
22 record.

23 Q. (By Mr. Kantarek) Welcome back,
24 Mr. Williams. Did you talk to anyone on your break?

25 A. No.

1 Q. So taking you to Claim 7. This is Page 173
2 of your declaration, which is Exhibit 1002. Claim 7
3 recites the method of Claim 1, "Further comprising,
4 informing an operator the time of receipt of a message
5 while playing the first message and the second message."

6 Do you see that?

7 A. Yes.

8 Q. Who -- who -- sorry. Strike that.

9 What disclosure of Nigawara discloses the
10 operator of Claim 7?

11 MR. STAVINOHA: Objection. Form.

12 A. I think that goes back to our original
13 discussion about plant operators. So I think that's
14 generally what this is referring to.

15 Q. (By Mr. Kantarek) So your position is that
16 the operator claimed in Claim 7 is disclosed by the
17 operators described in the background of Nigawara?

18 A. I also cite paragraphs, Column 7 -- 7 to
19 -- 25 to 28 which those voice messages having a priority
20 lower than the others are announced with a suitable delay
21 according to the priority order to solve the problem with
22 intermixed of announced messages. The operators being
23 the recipient, the listeners of those announced messages.

24 Q. So -- okay. So your position is that the
25 operators -- well, strike that.

Page 130

1 So that disclosure of Nigawara doesn't
2 mention operators; right?

3 MR. STAVINOHA: Objection. Form.

4 A. That particular passage doesn't use the
5 word "operator," but as I state here, based on these
6 considerations, it would have been obvious to POSITA to
7 include time and receive information with each voice
8 announcement.

9 Q. (By Mr. Kantarek) And the voice
10 announcement as we discussed would inform the plant
11 operators of Nigawara of whatever the message is; right?

12 A. Right.

13 Q. And so -- so -- so -- sorry, I'm trying to
14 understand. Is your position that Nigawara discloses the
15 operator's claim in Claim 7 or renders the operator's
16 claim in Claim 7 obvious?

17 MR. STAVINOHA: Objection. Form.

18 A. Well, the concept of operators is
19 disclosed, and then the -- the hearing of this time of
20 received by messages playing would be POSITA viewing it
21 as obvious.

22 Q. (By Mr. Kantarek) So if you look at -- if
23 you look at the end of Paragraph 288 starting with "for
24 example." Do you see that?

25 A. Right.

Page 131

1 Q. It says, "For example, if a lower priority
2 alert such as a quote -- such as 'a voice message signal,"
3 such as an announcement 'water data is normal' announced
4 by the operator who is observing the operating conditions
5 of Plant Site A,' was delayed and announced with a time
6 stamp, other operators would be able to assess how
7 relevant that information is and decide if they need to
8 check the, quote, water data of Plant Site A again."

9 Do you see that?

10 A. Yes.

11 Q. So in Nigawara, the operator is both
12 receiving and creating the messages?

13 A. Well, not the same operator in this
14 particular example. There's an operator in Plant Site A
15 sending -- observing the operating conditions and sending
16 a message that would then be communicated to other
17 operators.

18 Q. So would you say that some -- in Nigawara
19 some operators are users and some operators are operators?

20 MR. STAVINOHA: Objection. Form.

21 A. You are mixing terms, and I'm not even
22 sure Nigawara --

23 Q. (By Mr. Kantarek) Sorry.

24 A. -- uses --

25 Q. That's fair. Let me be more precise.

1 So would you say that in Nigawara, some of
2 Nigawara's operators would be the users claimed in the
3 '802 patent and some Nigawara operators would be the
4 operator claimed in Claim 7 of the '802 patent?

5 MR. STAVINOHA: Objection. Form.

6 A. It's possible. I would have to think
7 about that because of all the multiple uses and multiple
8 context of both of those terms.

9 Q. (By Mr. Kantarek) Sitting here today, you
10 are not sure of the answer to that question?

11 A. Not at this point in the afternoon.

12 Q. Does Nigawara disclose a dispatcher?

13 A. No.

14 Q. There's no reason for a dispatcher in
15 Nigawara; right?

16 MR. STAVINOHA: Objection. Form.

17 A. Well, I mean, utilities have field crews,
18 but the word "dispatcher" is not used in Nigawara. So
19 that's really the bottom line.

20 Q. (By Mr. Kantarek) So if we go to Claim 11,
21 and I promise we're not going to talk about 1H again.
22 We're going to talk about, at the end -- so this is
23 Page 175, which I think is the next page. If you look at
24 Paragraph 290 of your declaration, Exhibit 1002, you talk
25 about storing a message having a lower priority in a queue

Page 133

1 and checking periodically the status of the message being
2 played; right?

3 A. Right.

4 Q. As a -- as a difference -- sorry. Strike
5 that.

6 Basically what you are saying in
7 Paragraph 290 is that Claim 1 doesn't include the element
8 checking periodically the status of the message being
9 played; right?

10 MR. STAVINOHA: Objection. Form.

11 A. I really hate paraphrasing and summarizing
12 like that.

13 Q. (By Mr. Kantarek) Sure. You can read 290
14 to yourself. It does appear to me that something is
15 missing, but I'm just trying to get to -- like it seems
16 like Paragraph 290, it says -- so let's just read it.
17 "Claim 11 is nearly identical to Claim 1. The only
18 differences are that Claim 1 recites," quote, instead of
19 quote, and then you take that quote all the way to the
20 semicolon. And then it says "storing the message having a
21 lower priority in the queue; and checking periodically the
22 status of the message being played."

23 So I'm trying to understand from you if
24 this is saying that the last element, "checking
25 periodically the status of the message being played," if

Page 134

1 it's saying that is a difference in Claim 11 -- if that is
2 a difference -- that Claim 11 recites that Claim 1 does
3 not?

4 MR. STAVINOHA: Objection. Form.

5 A. It's a difference from Claim 1.

6 Q. (By Mr. Kantarek) All right. So -- so
7 your support for this is found in Paragraphs 292 or 293;
8 right?

9 A. 293.

10 Q. I'm sorry?

11 A. 291 to 293; right.

12 Q. Well, 291 defines a queue. So I was --

13 A. Right.

14 Q. Let me just take one slight step back so we
15 can -- so I can stop saying this. So if you go to Page 42
16 of your declaration but keep Page 176 open, if you could.
17 So Element 11G is checking periodically the status of the
18 message being played; right?

19 A. Correct.

20 Q. So let's just call -- we can just call it
21 Element 11B. So in Paragraph 292, you talk about how
22 Nigawara discloses voice message signals having priority
23 lower than others are announced with a suitable delay
24 stored according to priority order in the queue so as to
25 solve --

Page 135

1 THE COURT REPORTER: I'm sorry. You're
2 going to have to -- you're looking away and away from
3 your computer so you do sound muffled.

4 MR. KANTAREK: Sorry. Let me just start
5 that over.

6 Q. (By MR. KANTAREK) In Paragraph 292, you
7 state, "Nigawara discloses 'those voice message signals
8 having priority lower than the others are announced with a
9 suitable delay stored according to the priority order in a
10 queue so as to solve the problem of intermixture of
11 announced messages'"; right?

12 A. Yes, that's a correct reading.

13 Q. Right. And that's not applicable to
14 Element 11G; right?

15 A. That's just about the queue.

16 MR. STAVINOHA: Objection. Form.

17 Q. (By Mr. Kantarek) So then you say -- you
18 say then, "After the highest priority message is
19 announced, the priority order is determined again
20 according to the flow shown in Figure 3. Because of the
21 message announcing order determination, Unit 11 may have
22 received one or more voice message signal 6 during the
23 announcement"; right?

24 A. Right.

25 Q. So I guess where in that disclosure --

1 where in Paragraph 292 do you discuss Nigawara's
2 disclosure of checking the status of a message being
3 played?

4 A. Well, the citation on 655 into the
5 announcement of the first message signal, the message
6 announcing order determination unit may have received one
7 or more voice message signal 6 and the priority order is
8 determined again according to the flow in Figure 3.

9 So it's really a POSITA argument that you
10 don't -- you're not having an intermixture of signals and
11 you are tracking to see if the previous message has been
12 played so you can play the next one.

13 Q. So you are saying it renders this claim
14 obvious? It doesn't disclose it?

15 MR. STAVINOH: Objection. Form.

16 A. Well, the -- all of it is an obviousness
17 argument, so...

18 Q. (By Mr. Kantarek) But some of the elements
19 of these claims you say are disclosed versus rendered
20 obvious; right?

21 A. Yes. I --

22 Q. Or is everything in here just an
23 obviousness argument?

24 A. There's -- I would say given the -- I
25 would say given that citation, it's primarily an obvious

1 argument.

2 Q. So where in Paragraphs 290 to 293 do you
3 say "obvious"?

4 A. The word "obvious" is not in this set of
5 paragraphs.

6 Q. So these paragraphs don't include an
7 obviousness opinion; correct?

8 MR. STAVINOHA: Objection. Form.

9 A. Well, in effect, it does with
10 Paragraph 293, "Therefore, Nigawara" -- I can't
11 pronounce -- "disclosed storing lower priority messages
12 in a queue based on priority order as well as
13 periodically checking the status of the priority queue to
14 ensure the highest priority message is always being
15 played, thus, for all these reasons as well as the same
16 reasons described for Claim 1 incorporated here, Nigawara
17 also invalidates Claim 11."

18 So that is effectively the obviousness
19 articulation.

20 Q. (By Mr. Kantarek) Except you use the term
21 "discloses"; right?

22 A. Yes, that's true.

23 Q. And so in your declaration, you use obvious
24 when you want to say obvious; right?

25 MR. STAVINOHA: Objection. Form.

Page 138

1 A. I don't know that I say that a hundred
2 percent of the time.

3 Q. (By Mr. Kantarek) So reading -- if I'm
4 reading your declaration, I won't know when you are using
5 an obviousness ground or if you are saying it's disclosed?
6 It's just based on how you remember using the term?

7 MR. STAVINOHA: Objection. Form.

8 A. No, I wouldn't say that.

9 Q. (By Mr. Kantarek) Okay. So when you use
10 the term "obviousness" or "obvious," that means it's an
11 obviousness ground; right?

12 A. I think that's fair.

13 Q. And when you don't use the term "obvious,"
14 it's not an obviousness ground; right?

15 MR. STAVINOHA: Objection. Form.

16 A. The -- everything in here is an
17 obviousness argument. There's no anticipation argument.

18 Q. (By Mr. Kantarek) So what does "discloses"
19 mean as compared to "renders obvious" in your declaration?

20 A. At this point in the afternoon, I'm not
21 sure I can 100 percent state definitively that
22 distinction.

23 Q. So how am I supposed to understand what
24 your declaration means if -- if obvious -- if discloses
25 means obvious sometimes and -- I'm just trying to

Page 139

1 understand what you are saying.

2 MR. STAVINOHA: Objection. Form.

3 Q. (By Mr. Kantarek) It seems like this
4 ground is -- you say it discloses these elements, and you
5 do not say it renders them obvious. So my understanding
6 is that this is not an obviousness ground.

7 Is it your position today that this is?

8 A. All of this is --

9 MR. STAVINOHA: Objection. Form.

10 A. -- obviousness. And in terms of
11 disclosing, now that I relook at this, particularly with
12 respect to its dependency or similarity, I should say, to
13 Claim 1 and its reference back to those that --
14 there's -- that it does disclose.

15 Q. (By Mr. Kantarek) Not render obvious?

16 A. Again --

17 MR. STAVINOHA: Objection. Form.

18 A. -- everything about the arguments is based
19 in an obviousness, not an anticipation argument.

20 Q. (By Mr. Kantarek) Oh. So in your
21 declaration, when you list a claim element, no matter
22 whether or not you use the word "obvious," you are
23 contending that that claim element is obvious based on the
24 asserted art?

25 MR. STAVINOHA: Objection. Form. Asked

Page 140

1 and answered.

2 A. Yeah. I'm not sure I can explain it any
3 better than I have.

4 MR. KANTAREK: I don't think --
5 Mr. Stavinocha, asked and answered is a speaking
6 objection, and especially here where I'm trying to
7 understand what the declaration is saying and you are
8 providing an answer. That is certainly improper.

9 Q. (By Mr. Kantarek) Mr. Williams, so your
10 position is -- let me ask this question one more time
11 because this is pretty important. This is about your
12 entire declaration. We're supposed to respond to your
13 positions, and we need to know whether you are saying
14 something is obvious or not.

15 So I'm going to ask it again and if your
16 answer is you can't explain it, that's fine. But I'm
17 going to give you one more chance to tell me what this
18 means.

19 So in your declaration --

20 MR. STAVINOCHA: Objection.

21 Q. (By Mr. Kantarek) -- when you list a claim
22 element, no matter whether or not you use the word
23 "obvious," you are saying that -- strike that.

24 So in your declaration, when you list the
25 claim element -- strike that.

1 Why does this real time keep moving? Hold
2 on.

3 So in your declaration, when you list a
4 claim element, no matter whether or not you use the term
5 "obvious" -- I'm just going to copy and paste this because
6 this keeps moving. Give me one second.

7 All right. Mr. Williams, in your
8 declaration, when you list a claim element, no matter
9 whether or not you use the word "obvious," you are
10 contending today that the claim element is obvious based
11 on the asserted art; right?

12 MR. STAVINOHAN: Objection. Form.

13 A. I'm saying the overall -- overarching
14 argument is -- throughout is one of obviousness, not
15 anticipation. Now, I -- if I recall in various places, I
16 used discloses or discloses or renders obvious or just
17 discloses. And those -- by renders obvious, that's
18 generally in the -- in the view of a POSITA, looking back
19 at this particular claim, I think it does disclose the
20 elements of Claim 11. You are playing a message, your
21 priority message. You have to know when you're -- can
22 play the next message so you have to periodically check
23 and you check and when it's over, you play the next
24 message. In my view, that discloses it.

25 Q. (By Mr. Kantarek) So this is not -- you

1 are not contending that element -- that Claim 11, that the
2 elements you identify in Paragraph 290 is different from
3 Claim 1. You are not contending that those elements are
4 obvious in view of Nigawara? You are contending Nigawara
5 discloses that?

6 MR. STAVINOHA: Objection. Form.

7 A. As I -- as I state in 293, Nigawara
8 discloses that. So discloses.

9 Q. (By Mr. Kantarek) We can move on to -- oh,
10 actually, so you are saying Nigawara discloses it, and the
11 element you are talking about is 11G, which again, is
12 playing -- or I'm sorry -- checking periodically the
13 status of the message being played; right?

14 A. Right.

15 Q. So Nigawara's messages, they are a known
16 quantity when the system announces them; right?

17 MR. STAVINOHA: Objection. Form.

18 A. Their priority is known.

19 Q. (By Mr. Kantarek) I'm saying the content
20 is known before the system announces them; right?

21 A. The priority of -- based on the content is
22 known and the content has been recorded. So --

23 Q. So it's a recording. It's not people
24 communicating back and forth; right?

25 A. Right. But no one has heard the message

Page 143

1 at that point.

2 Q. I understand what you are saying. So these
3 aren't live messages; right, back and forth between
4 different operators?

5 MR. STAVINOHA: Objection. Form.

6 A. I -- I forget whether there's kind of a
7 live capability announcement in here, but the whole point
8 is to not lose messages and to not intermix them.

9 Q. (By Mr. Kantarek) If you go to Claim 13,
10 which is Page 178.

11 A. Okay.

12 Q. If you look at Header 11. If you go down
13 to where it says "Central conferencing system comprising."
14 Do you see that? It's about a little over half --
15 slightly over halfway down --

16 A. Yes.

17 Q. -- in the little section.

18 So Claim 13 claims a central conferencing
19 system; correct?

20 A. Yes.

21 Q. What does a conference mean to you in the
22 context of the '802 patent?

23 A. Well, let's go to '802. There's a couple
24 places at least that it talks about conferencing system.
25 Figure 5 discusses various modules that a conferencing

Page 144

1 system has including an input from a receiver and player
2 module.

3 Q. So again, my question was: What does a
4 conference mean to you in the context of an '802 patent --
5 the '802 patent?

6 A. The word "conference" is not used in the
7 '802 patent. It's conferencing that is used.

8 Q. Okay. What does the word "conferencing"
9 mean to you in the context of the '802 patent?

10 A. It says, for example, the invention
11 provides a central conferencing system for managing a
12 plurality of radio messages received by an emergency
13 communication system. And then it goes on to discuss the
14 various components and what that does.

15 Q. What does the word "conferencing" mean to
16 you in the context of the '802 patent?

17 A. I just answered that.

18 MR. STAVINOHA: Objection. Asked and
19 answered.

20 Q. (By Mr. Kantarek) You said the invention
21 provides a central conferencing system for managing radio
22 messages received by an emergency communication system.

23 I'm asking you for your understanding of
24 the term "conferencing."

25 A. I did not have to extract the word

1 "conferencing" and define it in that respect. The term
2 used in the patent is "central conferencing system,"
3 which has all the different components that I described.
4 I did not pick out each individual word.

5 Q. So sitting here today, you are not prepared
6 to tell me what the word "conferencing" as used in the
7 '802 patent means?

8 A. I'm prepared to discuss how the term
9 "central conferencing system" is used.

10 Q. So maybe you could just answer my question
11 so I have it on the record.

12 Sitting here today, you are not prepared to
13 tell me what the word "conferencing" as used in the '802
14 patent means?

15 A. The word "conferencing" without being in
16 the term "central conferencing system" does not exist in
17 the '802. So I'm not prepared to pick out conferencing
18 and just describe that word by itself.

19 Q. Okay. What is a central conferencing
20 system -- strike that.

21 All right. Let's move on to Claim 20.
22 Claim 20 is on Page 194 of Exhibit 1002. We talk about
23 this with respect to Ohel as well. "Claim 20 recites the
24 method of Claim 1 wherein playing the message, comprises
25 playing the message having a higher priority between the

1 first and second message without storing the message
2 having the higher priority if no other message is being
3 played."

4 Do you see that?

5 A. Yes.

6 Q. Well, in Paragraph 318, you state,
7 "Nigawara discloses that 'when plural, for example, two,
8 voice message signals 6 are simultaneously applied, the
9 priority order and the type of voice message signals 6'
10 are determined and sent on to Step S3 to classify them
11 into a first message signal and a second message signal
12 according to the predetermined priority order"; right?

13 A. Correct.

14 Q. So you are talking about voice message
15 signal 6; is that right?

16 A. Yes.

17 Q. And as we talked about with respect to
18 Claim 1, the first and second message are information
19 signals 5; right?

20 MR. STAVINOHA: Objection. Form.

21 A. That's -- that's how it was described in
22 Claim 1, I think.

23 Q. (By Mr. Kantarek) Described by you; right?

24 A. Yeah, in my declaration.

25 Q. But now the claim message is voice message

1 signal 6; right?

2 A. 5 and 6 in my POSITA opinion is
3 effectively the same data. It's just formatted
4 differently, so there's no incongruity there.

5 Q. At the end of Paragraph 318, you say,
6 "Therefore when the two overlapping messages do not have
7 the same priority, the higher priority message is
8 announced first without delay"; right?

9 A. Right.

10 Q. So that doesn't say anything about storing
11 or not storing the message played first; right?

12 MR. STAVINOH: Objection. Form.

13 A. Sorry, repeat the question.

14 Q. (By Mr. Kantarek) Paragraph 318 doesn't
15 say anything about storing the message having the higher
16 priority; right?

17 A. It doesn't use those words in this
18 paragraph.

19 Q. Where in the paragraph does it talk about
20 storing the message having the higher priority?

21 A. Well, in Nigawara all messages incoming
22 of -- before they are prioritized are essentially
23 buffered or stored, and then they go through a priority
24 determination process.

25 Q. All right. Let's move on to Claim 21,

Page 148

1 that's Paragraph 321. It's on the next page, hopefully.
2 In Paragraph 321 -- sorry. Let's -- let's go back to
3 Heading 18. Claim 21, it says, "The method of Claim 1
4 wherein determining the priority comprises determining the
5 priority based on the dedicated channel the first message
6 and/or the second message is received on."

7 Do you see that?

8 A. Yes.

9 Q. Now, the channel you identified is Units 1
10 and 2 from Plant Site A or Plant Site B; right?

11 MR. STAVINOHAN: Objection. Form.

12 A. Correct.

13 Q. (By Mr. Kantarek) And here at the bottom
14 of Paragraph 321, you say, "Because each channel is
15 dedicated to a plant site, it would have been obvious to a
16 POSITA that determining priority based on the operation
17 mode of the plant would include determining priority based
18 on the plant (dedicated channel itself)." Correct?

19 A. Correct.

20 Q. There's only one plant in Nigawara's
21 disclosure; right?

22 A. No. It talks about plants -- Plant Site
23 A, B, C through N.

24 Q. Right. That says plant site and -- sorry.
25 Your understanding is that Plant Sites A, B, C through N

Page 149

1 are different plants in Nigawara?

2 A. They are distinctions. I suppose they
3 could be component -- depends on how you defined plant.
4 I mean, a plant particularly -- I would imagine a power
5 plant is a -- has a variety of components. So it could
6 be individual plants or components of plants and viewed
7 as a plant site. I don't think it specified it.

8 Q. Well, if we look at, again, the beginning
9 of Nigawara, Column 1, Line 40, "With a view to solving
10 the prior art problem -- sorry. Strike that. Let's go to
11 Column 1, Line 27.

12 It says, "Practically it is required to
13 provide an independent voice message announcing device for
14 each of the individual suitably divided units of the
15 plant."

16 Would those be plant sites?

17 A. Yeah, that's it.

18 Q. So one plant; right?

19 A. It -- just if you -- if you -- a plant
20 isn't a room. A plant is a huge sprawling complex full
21 of different operations. So, you know, plant site could
22 be part of all one macro plant, if you will. I --
23 potentially it could be multiple plants just depending on
24 how you define plant. This passage seems to refer
25 primarily to a breaking up of the plant into individual

Page 150

1 major components.

2 Q. Sure. And again, I can show you another
3 part of Nigawara at 140 where it says, "With a view to
4 solving the prior art problem described above is a primary
5 object of the present invention to provide an automatic
6 voice message announcing method and system for use in a
7 plant, such as a thermal power plant for sequentially
8 announcing voice messages pertaining to different
9 operating conditions without the possibility of
10 intermixing messages even when the plurality of voice
11 message announcing devices are provided in the plant."

12 So I just -- I -- may be you can tell me
13 where in Nigawara it discloses determining priority based
14 on the plant if there's only one plant? Or maybe you
15 meant plant site, which is fine too.

16 MR. STAVINOHA: Objection. Form.

17 A. Well, it does refer -- it does use both
18 plant sites and plants. Plants is used in Column 4,
19 message signal generating units 2 of the individual
20 plants. And then also in table -- or excuse me, Column
21 5, Line 53, also in the case of parallel operation of the
22 plant with other plants for power generation, a voice
23 message signal is generated. So I think it covers both
24 categories of embodiments.

25 Q. (By Mr. Kantarek) If it's determining

Page 151

1 priority based on the plant and different plant sites have
2 their own dedicated -- their own dedicated channel, how is
3 that determining a priority based on the plant site?

4 MR. STAVINOHA: Objection. Form.

5 A. I'm sorry. Repeat the question.

6 Q. (By Mr. Kantarek) So if Nigawara is
7 determining priority -- or sorry.

8 If the claim is determining -- strike that.

9 If Nigawara is determining priority based
10 on the plant and different plant sites have their own
11 dedicated channel, how does Nigawara determine a priority
12 based on the plant site?

13 MR. STAVINOHA: Objection. Form.

14 A. I would have to go back and think about
15 that. I can't answer right now.

16 MR. STAVINOHA: Dave, you about ready for
17 another break?

18 MR. KANTAREK: I just have one more
19 question, and I can pass it to you if you want to just
20 wait. Sorry, maybe two or three more. One more small
21 thing on this claim. So I would appreciate if we could
22 finish up this claim. I don't know about you,
23 Mr. Williams.

24 THE DEPONENT: Okay.

25 MR. KANTAREK: I just want to look at one

1 paragraph.

2 Q. (By Mr. Kantarek) So in Paragraph 251 of
3 your declaration, this is exhibit -- this is Page 153.
4 You say, "When Nigawara's system encounters plural demands
5 for voice message announcement, voice message output
6 signal 6 from the individual plants are stored in a voice
7 message signal memory 10 and sent to the message
8 announcing order determination unit 11, which determines
9 the priorities of each message."

10 So if Nigawara's system encounters more
11 than one demand for voice message announcement, the voice
12 messages are stored; right?

13 MR. STAVINOHA: Objection. Form.

14 A. I think that's a fair statement.

15 MR. KANTAREK: I don't have any further
16 questions. We can take a break for redirect.

17 MR. STAVINOHA: Why don't we take
18 20 minutes, and I will circle back at 4:15 Central. Does
19 that work?

20 MR. KANTAREK: Sounds good.

21 THE COURT REPORTER: We're off the record.

22 (Recess from 2:55 p.m. to 3:15 p.m.)

23 THE COURT REPORTER: We're back on the
24 record.

25 MR. STAVINOHA: I have no further

Page 153

1 questions. Thank you for your time, Mr. Williams.

2 Just to be clear, we would like to read
3 and sign the transcript. Otherwise, I think that wraps
4 us up. We can go off the record.

5 MR. KANTAREK: Thanks, everyone.

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

8 THE DEPONENT: Thank you.

9 * * * * *

10 WHEREUPON, the foregoing deposition was
11 concluded at the hour of 3:16 p.m. Total time on the
12 record was 4 hours and 27 minutes.

13

14

15

16

17

18

19

20

21

22

23

24

25

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

I, DAVID HILLIARD WILLIAMS, the deponent in the above deposition, do acknowledge that I have read the foregoing transcript of my testimony, and state under oath that it, together with any attached Statement of Changes pages, constitutes my sworn testimony.

_____ I have made changes to my deposition

_____ I have NOT made any changes to my deposition

DAVID HILLIARD WILLIAMS

Subscribed and sworn to before me this _____ day of _____, 2024.

My commission expires:_____.

Notary Public

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

CERTIFICATE OF COURT REPORTER

I, DEANNA BAYSINGER, a Registered Professional Reporter and Notary Public within and for the State of Colorado, commissioned to administer oaths, do hereby certify that previous to the commencement of the examination, the witness was duly sworn by me to testify the truth in relation to matters in controversy between the said parties; that the said deposition was taken remotely in stenotype by me at the time and place aforesaid and was thereafter reduced to typewritten form by me; and that the foregoing is a true and correct transcript of my stenotype notes thereof.

That I am not an attorney nor counsel nor in any way connected with any attorney or counsel for any of the parties to said action nor otherwise interested in the outcome of this action.

My commission expires: November 8, 2026.



DEANNA BAYSINGER

Registered Professional Reporter

Notary Public, State of Colorado

1 Clarke Stavinoha

2 clarke.stavinoha@bakerbotts.com

3 May 31st, 2024

4 RE: Motorola Solutions, Inc. v. Sta Group

5 5/23/2024, MSI David Hillard Williams (#6699382)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 (Calendar-pnw@veritext.com).

16 Return completed errata within 30 days from
17 receipt of testimony.

18 If the witness fails to do so within the time
19 allotted, the transcript may be used as if signed.

20

21

22 Yours,

23 Veritext Legal Solutions

24

25

Page 157

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA SOLUTIONS, INC.,

Petitioner,

v.

STA GROUP LLC,

Patent Owner.

IPR2023-01292

Patent 7,324,802 B2

**ERRATA SHEET FOR THE MAY 23, 2024 DEPOSITION OF DAVID
HILLIARD WILLIAMS**

I, David Hilliard Williams, do hereby make the following corrections to my
May 23, 2024 deposition transcript:

PAGE	LINE	CHANGE/CORRECTION	REASON
35	22	“nothing” to “nothing, it was”	Transcription Error
48	10	“When a:” to “1[a]:”	Transcription Error
65	21	“mids” to “nits”	Transcription Error
80	5	“then a user’s transmission will be recorded a set” to “then the user’s transmission will be recorded as set forth above”	Transcription Error
123	13	“Nigawara disposes the term” to “Nigawara discloses determining”	Transcription Error
126	25	“3N” to “3, N”	Transcription Error
137	4	“655” to “6:55”	Transcription Error

I declare under penalty of perjury that, except for any corrections noted
above, the transcript is an accurate record of the statements made by me.

Date: June 19, 2024



David Hilliard Williams

0	134:18 135:2,5	106 16:24	127 53:8,11
0001 31:16	138:16 140:13	85:13,20	55:22 62:2
1	143:3 146:24	107 85:13,20	128 49:15
1 4:7 7:1 13:23	147:18,22	109 90:15	12:04 73:8
14:21 16:14	149:3,9 150:9	10:08 32:16	12:30 72:21
31:8,10 32:25	150:11	10:09 32:20	12:56 101:10
42:4 47:24	1-21 4:13	11 100:21	13 4:11 62:11
49:4 50:3,6,7	1/29/08 4:11	103:8,17,23	97:11 105:7,9
52:9,25 54:1	10 27:16 67:24	104:14,20,25	144:9,18
56:1,3 58:19	153:7	105:4 116:19	130 51:19
58:20,23 61:8	100 139:21	116:20,24	131 49:7,19
61:11 62:7,11	1001 2:8 4:11	117:3,5 133:20	132 68:17
62:19 69:19	12:24 13:2,12	134:17 135:1,2	134 69:21
70:7 73:23	13:14 42:2	136:21 138:17	71:19 107:10
74:13 79:19	89:11	142:20 143:1	135 71:24
81:2,8,14	1002 4:12 8:18	144:12 153:8	136 123:1
84:18 85:23	8:19 21:16	112 4:17 97:9	137 73:19 74:6
90:18 91:13,24	25:16 26:5,11	99:2	78:4
93:4,5 95:15	47:1,8 55:24	117 103:6,16	138 75:7 77:3
97:12 103:23	62:2 68:17	11:19 73:8	139 74:22 79:1
104:2 105:4	81:1 83:5,7	11b 135:21	79:13
107:14 110:21	85:13 90:16	11g 135:17	14 63:3 99:7
112:13,24	101:15 103:7	136:14 143:11	113:7
113:3,7 114:25	119:21 130:2	11h 101:20	140 79:2 80:9
115:17 117:5,8	133:24 146:22	102:8 103:1,3	151:3
117:10 118:6	1004 4:15	103:4,9,14,18	141 80:24
118:17,20,23	42:18,19,21	104:12,18	117:11
119:2,13	43:2 86:10	105:1,5 116:25	142 78:4
120:11,13,21	107:20	117:6	144 119:16,21
120:23 121:2,3	1007 4:17	12 33:9,16 34:5	146 84:22
121:18,20	112:6,9,11	120 105:8,11	147 83:15 84:7
122:4,16,17	113:8	125 47:9,11,23	121:2
124:13,18	10112 2:4	49:19	148 84:22
126:25 128:10	104 16:21	126 49:7,15	121:8
130:3 134:7,17			

15 56:1,3 62:7 67:24,25 150 123:2 153 153:3 16 112:24 165 85:12 86:3 166 85:12 87:1 87:2 124:11 167 129:11 17 113:3 173 130:1 175 94:7 116:22 133:23 176 90:24 91:4 105:20,22 135:16 177 90:25 91:16 92:4,8 92:22 93:24 94:11 178 94:7 144:10 18 20:10,13 21:17,18 61:8 62:23,24 63:2 65:16 66:17 149:3 180 95:14,20 96:24 181 97:7 99:2 182 98:18 99:23 193 103:9,22 105:3	194 146:22 1998 11:4 1:09 101:10 1:58 129:20 1a 48:3,5 49:15 50:24 117:12 1b 68:22 119:15,20 120:19 1c 71:25 73:23 77:19 120:18 121:7 1e 83:6,8,10,24 1g 102:12,25 103:3,4 1h 104:12 133:21 1st 122:4	153:18 159:15 200 2:8 2000 11:4 20001 2:13 2001 7:1 11:21 11:24 2004/0117859 4:15 42:24 2015 36:24 202-639-7700 2:14 2023 9:4 2023-01 32:3 2024 1:19 3:5 155:16 157:3 2026 156:17 21 56:1,3 62:7 62:12 148:25 149:3 212-408-2500 2:5 22 13:24 16:13 62:19 221 110:2 222 109:13 223 109:17 110:2 22389 156:20 224 110:1 23 1:19 3:5 237 117:9,11,15 118:2 119:6 24 63:3 241 120:3	246 121:15 248 123:13 25 14:1,21 42:4 130:19 251 33:21,23 34:5,14,25 35:7 36:8 37:8 37:13 153:2 26 14:25 114:25 27 115:14,17 150:11 154:12 275 124:10,11 124:22 28 130:19 288 131:23 29 7:1 128:10 290 116:22 117:4 133:24 134:7,13,16 138:2 143:2 291 105:19,22 107:3 135:11 135:12 292 135:7,21 136:6 137:1 293 135:7,9,11 138:2,10 143:7 2:05 101:7 2:09 129:20 2:55 153:22
	2		3
	2 4:9 37:24 38:1,6 47:19 97:8,11,12 98:7,9,14 116:20 118:6 118:20,23 119:2 120:21 120:23 121:4 121:18 123:2 126:10,19,19 126:22,25 149:10 151:19 20 62:23,24 63:2 65:16,17 107:8,13 146:21,22,23		3 16:16 42:15 85:11,20,21,23 98:7 124:9,13

125:24 126:2 136:20 137:8 30 2:4 33:9,17 33:18 35:6 37:4 157:16 31 4:7 14:22 21:18 25:17 26:2,4,11,21 34:13 35:6 37:4 312-807-4206 2:19 318 147:6 148:5,14 31st 157:3 32 21:19,21 321 149:1,2,14 33 22:14 125:24 126:2 3300 2:18 37 115:14,18 38 4:9 39 25:17 26:2,5 26:11,21 125:24 126:3 3:07 129:17 3:15 153:22 3:16 154:11 3n 126:25	4,914,705 4:17 4/3/90 4:17 40 116:4 150:9 42 4:15 101:15 101:16 107:21 107:24 108:18 135:15 43 101:14 44th 2:4 47 84:25,25 4:15 153:18	97:25 112:14 122:1,5,23 136:22 137:7 147:8,9,15 148:1,2 153:6 6/17/04 4:16 60602 2:19 650-739-7500 2:9 655 137:4 6699382 157:5 158:2 159:2 68 97:21	8 8 4:12 98:6 156:17 802 13:19,21 14:12,13,22 15:3,7,14,17,24 17:9,14,16,24 18:16,24 19:3 19:8,17,24 20:10 21:13 22:23 23:17 35:8 37:9 38:11,20,21,24 39:5,7,10,14,15 39:17,20,24 40:6,9,13,15 41:3,9,12,17,20 41:24 42:2,12 43:12 47:24 50:7 54:1,15 54:18 55:17,25 56:6,13 57:25 58:20,23 59:5 59:14 60:3,25 61:7 62:3,6 64:9,12,15 66:17 67:7 75:8 76:10,10 77:4,7 89:11 93:22 114:8,11 114:19 116:20 119:13 120:11 120:13 133:3,4 144:22,23 145:4,5,7,9,16
	5		
	5 4:3 43:16,22 46:11,13 81:16 86:17 89:9 97:24 117:16 118:4,6,12 120:4,22 144:25 147:19 148:2 151:21 5/23/2024 157:5 50 9:9 500 84:18,21,23 84:25 51 109:25 52 27:16 53 151:21 58 89:12 59 16:15,16,20 5s 118:18	7 7 20:10,13 62:23,23 63:2 65:16 66:17 70:1 81:17 86:18 95:14,14 96:7,13 98:6 122:4 123:5 130:1,2,10,16 130:18,18 131:15,16 133:4 7,324,802 1:14 4:11,14 12:25 13:16 70 2:18 86:7,10 94:1 700 2:13 75 9:12 76 72:1	
	6		
4 55:22 62:2,20 64:1 89:12 97:24 126:14 129:10 151:18 154:12	6 90:15,18,25 91:5 95:8		
4			

[802 - analysis]

146:7,13,17 83 47:9	103:9 116:7 151:4 155:2 157:6 159:7	actually 10:23 11:19 16:3 32:4 41:20 57:25 67:20 73:13,13 83:5 84:6 89:1,2,8 94:11 99:3 126:19 129:13 143:10	44:14,19,20,22 45:21,23 46:4 66:19
9	absence 115:6 125:14 128:14	ad 33:24 35:21 36:13,15 37:15	agreed 18:20 45:20
9,445,251 4:8 31:15 33:3 9.445,251 36:9 90 72:1 73:19 911 58:15 93 80:25 94 83:4 94304 2:9 96 83:6 9:03 3:5 9:16 13:8 9:17 13:8 9:51 32:12 9:59 32:12,20	absolutely 38:14 101:1 accenture's 11:5 accessible 98:12 99:15 100:7,7 accessories 4:10 38:4 accommodate 68:4 89:4 accuracy 157:9 accurate 97:6 accurately 15:8 29:13 acknowledge 40:20,24 155:2 acknowledge... 159:3 acknowledg... 157:12 acronym 83:1 act 14:4 15:12 16:7 42:6 action 156:15 156:16 active 11:14 30:24 99:6 activities 34:1	add 24:12 26:21 127:11 added 21:2 37:23 additional 10:12 65:5 additions 159:6 address 41:9,18 128:8 administer 156:4 administrative 58:17 advocating 128:24 aforesaid 156:10 afternoon 133:11 139:20 ago 12:4 32:6 35:4 36:25 agree 5:25 17:15,20 18:9 18:13 26:16	agreeing 17:18 ahead 60:16 68:3 114:14 airport 127:18 alarm 35:14 alert 132:2 alleged 27:3 70:15 alleges 34:14 allocate 56:17 61:9 allocated 57:3 57:11,15 allocation 13:24 62:15 allotted 157:19 allowing 33:25 allows 52:8,24 53:3 alto 2:9 ambiguity 48:9 ambiguous 109:2,2 amount 21:14 90:12,13,14 128:21 analogous 37:6 37:10,18 analysis 19:11 19:15,22 20:6
a			
a.m. 3:5 13:8,8 32:12,12,20,20 73:8 a1 4:16 ability 74:24 79:16 81:3 107:22 able 9:23 10:14 14:7 29:25 35:19 51:15 61:11 72:10 132:6 abnormal 113:14,19 above 47:23 79:19 80:6			

[analysis - asserted]

26:3,7,14 28:25 29:1 36:20 37:18 40:22 45:3,9 45:12,25 60:17 60:18,20 61:2 61:16 63:24 64:21 100:15 127:14 analyze 61:12 94:20 111:1 analyzed 19:17 19:25 27:3 102:18,20 announced 113:15,17 115:6,9,21,24 125:13 128:13 128:16 130:20 130:22,23 132:3,5 135:23 136:8,11,19 148:8 announcement 131:8,10 132:3 136:23 137:5 144:7 153:5,11 announces 143:16,20 announcing 112:15,17,18 112:20 113:8 115:2,4 116:8 116:10,13 122:20 125:12	125:19 126:5 128:11 136:21 137:6 150:13 151:6,8,11 153:8 answer 15:8 19:10 27:8 29:25 34:20,20 37:2,19 40:24 41:1 45:24 48:3 49:14 51:15 54:8 59:22,22 61:23 72:12 77:15 79:5,6,24 91:3 92:14,19 102:22 112:23 117:20 133:10 141:8,16 146:10 152:15 answered 41:6 51:17 52:23 76:6 122:14 141:1,5 145:17 145:19 anticipation 139:17 140:19 142:15 apco 70:1 81:14,16 86:3 86:17 89:3 apologize 71:7 124:16 appeal 1:3 29:3	appear 134:14 appearances 2:1 appearing 1:17 3:6 34:18 appears 15:9 35:3 appended 159:7 applicable 19:19 127:15 136:13 157:8 application 4:15 42:24 112:19 applied 147:8 applies 82:10 appreciate 15:22 45:17 48:22 152:21 appropriate 3:1 27:13,14 87:4,20 architecture 11:8 argument 99:22 137:9,17 137:23 138:1 139:17,17 140:19 142:14 argumentative 60:8 70:9 arguments 25:11 140:18	arisen 115:8,23 128:15 art 7:3 22:5,6 22:10,16,16,21 23:6,15,21 24:6,21,24,24 25:4,9 26:5,12 27:3,3,6,11,12 37:6,9,10,18 62:17 83:2 113:8,23 116:6 140:24 142:11 150:10 151:4 articles 22:16 22:21 articulation 138:19 artisan 29:14 aside 7:15 10:9 82:25 asked 45:19 48:20 51:16 140:25 141:5 145:18 asking 5:9 15:21 17:20 23:13 38:20 50:14 67:5 71:14 103:1 118:9 145:23 aspects 26:1 36:3 asserted 22:23 140:24 142:11
--	---	---	---

assess 132:6 assign 92:11 assigning 90:19 91:25 associate 11:5 associated 84:17 99:25 105:16 127:6 127:25 assume 6:7 71:15 assuming 41:20 assumptions 43:20 attached 155:4 157:11 attempting 61:2 attorney 22:11 23:8 24:1,13 72:9 156:13,14 157:13 attorneys 8:11 8:13 30:23 audio 88:11,13 88:19 89:4,6 90:10 99:5 august 9:6 authentication 38:6 author 30:5 automatic 116:8 151:5 automatically 113:15	available 21:13 157:6 avoid 14:4 48:21,22 127:12 aware 10:21 29:2 b b 25:16 47:22 48:3,6,10 120:17,22 149:10,23,25 b2 4:11,14 back 13:9 15:6 15:14,18 24:15 25:25 30:19 32:13,21 37:22 38:24 39:24 42:15 47:1 49:10 73:9,11 75:7 76:9 93:11,16 94:4 95:4 99:13 100:1 101:11 101:13 102:11 107:8,25 108:10,20,24 109:6,9 111:20 120:19 123:17 129:21,23 130:12 135:14 140:13 142:18 143:24 144:3 149:2 152:14 153:18,23	background 114:1 130:17 baker 2:3,8,12 bakerbotts.com 2:5,10,14 157:2 balance 128:4 ballpark 12:11 bandwidth 75:11 85:24 87:4,11,16,20 88:1,7,15 89:3 89:5,17,22 90:2,7,13,14 124:19 127:16 bartusiak 2:22 based 11:7,12 33:5 44:21 50:24 74:2,8 77:21,25 78:15 78:16,21,23 79:4,10 80:20 80:20,22 86:21 90:21 91:6,17 91:18 92:1,6 92:11,22,23 94:22 104:3,8 105:16,25 106:9 107:3,6 111:6 116:21 121:12,16 123:14 131:5 138:12 139:6 140:18,23 142:10 143:21	149:5,16,17 151:13 152:1,3 152:9,12 basically 134:6 basis 25:21 26:2,7,14 36:14 baysinger 3:6 156:2,21 began 79:24 beginning 39:11 63:6 112:13 113:5 125:7,8 128:9 150:8 begins 44:4 46:13 69:25 behalf 2:2,16 believe 6:25 10:15 20:4,5 25:23 97:15 120:16 belong 12:20 beneficiary 41:20 benefits 5:21 best 5:16,17 91:3 better 141:3 beyond 37:16 binder 13:3 bit 5:18 7:23 8:16 10:16 15:13 22:1 24:18 58:4
--	---	--	---

[bit - channel]

73:3 87:23 93:3 125:1 blank 106:22 blasting 126:14 127:20 board 1:3 29:3 body 78:3 bolded 103:8 103:18 105:14 bombarding 128:2 bottom 21:18 33:15,16 46:11 84:7 103:8 116:24 124:12 133:19 149:13 botts 2:3,8,12 bounds 95:11 box 121:3 boxes 120:21 121:3 bracket 47:14 47:16 brain 12:6 break 6:15,18 32:16 67:22,25 68:2,3,4,13 72:18,21 73:4 73:4,12,14,18 100:24 101:2 129:12,24 152:17 153:16 breaking 70:25 150:25	breaks 6:14 brief 6:4 briefly 5:13 24:14 47:22 48:16 broad 59:18 broadening 62:11 broader 40:6 57:8 broadly 46:9 49:10 brought 60:15 buffer 5:19 buffered 148:23 building 57:23 burke 2:12 button 45:7	care 58:16 127:23 128:4 case 1:13 25:9 25:24 30:14 31:19 53:5,6 53:23 75:24,25 151:21 cases 30:22 categories 151:24 cats 35:21 caution 9:18 30:15 caveat 11:3 cdma 71:13,13 81:16,19,25 86:4,17 cell 71:12,20 97:23,24 central 99:24 101:7 129:17 144:13,18 145:11,21 146:2,9,16,19 153:18 certain 19:14 30:1 certainly 17:18 26:18 29:24 35:3 37:17 38:17 61:5 110:3 123:19 129:5 141:8 certificate 156:1	certify 156:5 cetera 20:24 41:21,22 chain 34:18 chance 141:17 change 112:17 113:16,19 158:4,7,10,13 158:16,19 changed 33:11 110:23 changes 9:23 10:2,9 110:19 112:17 155:4,8 155:10 157:10 159:6 channel 14:6,7 14:8,8 44:1,1,7 45:10 46:17 47:13,18,19 48:1,11,14,24 50:17 51:23 53:12,12 56:15 56:17 57:3,6,7 57:15 58:20,24 59:6 60:4 61:10 68:23 73:25 74:2 75:11 80:12 89:18,22 104:6 104:8 117:17 118:6,19,24 119:1,3,7,25 120:20,24 121:5,10,11
	c		
	c 5:1 149:23,25 calendar 157:15 california 2:9 call 13:18 46:23 135:20 135:20 called 3:3 5:3 calls 122:22 capability 144:7 capacity 11:25 capturing 100:3		

[channel - column]

149:5,9,14,18 152:2,11 channels 14:5 45:11 47:14,15 48:12,13 51:4 56:15 58:12 62:15 68:25 70:3 121:2 characterize 25:5 44:23 45:21 chat 7:13,15,17 check 28:15,23 132:8 142:22 142:23 checking 104:21 134:1,8 134:21,24 135:17 137:2 138:13 143:12 chicago 2:19 choice 71:3 choose 24:22 25:3,6 29:9 choosing 94:13 chronological 84:5 chronologica... 84:9 circle 153:18 circumstance 111:16 circumstances 25:10	citation 65:16 65:20 67:3 137:4,25 citations 66:7 cite 55:25 61:8 62:19,22 63:16 64:4 65:11,24 69:7 86:7 109:23 130:18 cited 15:10 25:4 27:12 57:14 cites 109:25 civil 3:2 claim 16:3 23:20 47:23,24 49:4,19 50:1,3 50:6,7,10,16 51:10 52:9,25 53:6,25 54:1 54:11 55:3,4 58:19,20,23 60:1,18 61:11 69:19 70:7 71:18 78:13,21 85:11,20,23,23 89:9 90:15,18 90:18,25 91:5 91:13,18,24,24 92:6 93:4,5,16 94:22 95:8,14 95:14,15 96:7 96:13 100:21 103:1,8,17,23 103:23 104:2	104:14,20,25 105:4,4,7,13 107:8,13,14 116:19,20,24 117:3,5,5,8,10 119:13 120:11 120:13,13 124:9,12,13,13 124:18 129:10 130:1,2,3,10,16 131:15,15,16 131:16 133:4 133:20 134:7 134:17,17,18 135:1,2,2,5 137:13 138:16 138:17 140:13 140:21,23 141:21,25 142:4,8,10,19 142:20 143:1,3 144:9,18 146:21,22,23 146:24 147:18 147:22,25 148:25 149:3,3 152:8,21,22 claimed 49:3 49:15,23 54:2 54:14,18 60:11 61:11 69:16 70:16,17 71:1 71:9 77:6 90:25 93:21 117:16 118:3	119:5,12 120:10,13,20 130:16 133:2,4 claims 4:13 19:20 20:4 22:23 23:17 58:23 59:5 60:3 90:18 91:24 102:19 102:22 137:19 144:18 clarke 2:3 157:1 clarke.stavin... 2:5 157:2 classify 147:10 clean 117:25 clear 59:15 60:25 64:21 154:2 clearly 100:3 client 63:13 cocounsel 5:11 code 88:11,13 88:19 collectively 118:25 colloquially 43:12 44:18 colorado 1:18 3:4,7,8 156:4 156:22 column 13:23 14:21 16:14,16 20:10,12,13
--	--	--	--

[column - conferencing]

27:16 42:4,15 56:3 61:8 62:7 62:11,19,23 63:2 65:16 66:16 89:12 112:13,24 113:3,7 114:25 115:17 125:24 126:2 128:10 130:18 150:9 150:11 151:18 151:20 combative 48:19 combination 65:17 75:12 89:24 combinations 20:18 45:6 63:20 64:5 65:12 66:7,23 67:11 combine 41:19 119:2 come 36:19 127:5 comes 30:19 comfortable 23:11 25:13 coming 35:15 67:24 73:5 111:11 112:2 120:22 121:4 command 34:18	commencem... 156:5 commencing 3:5 commission 155:17 156:17 commissioned 156:4 common 70:22 71:10 commonalities 36:22 communicate 35:23 57:21,22 97:23 communicated 132:16 communicating 43:24 69:22 143:24 communication 16:22 17:4,7,9 17:24 18:5 44:3,6 46:14 46:16,19,24 47:15 48:12 51:4 56:14,15 56:19 68:25 80:13 82:12 97:12 98:4 109:15 145:13 145:22 communicati... 11:5 17:10,25 30:16 34:17	36:2,4 41:7,8 46:10 53:13 86:16 114:21 114:23 compared 102:21 139:19 comparison 19:2 36:17 38:17 competing 111:18 complete 45:11 118:5 159:8 completed 157:16 completely 48:9 110:25 completes 44:3 completing 102:13 complex 150:20 complicated 61:18 component 150:3 components 39:2 40:2 145:14 146:3 150:5,6 151:1 comprises 85:24 90:19 91:25 107:14 124:18 146:24 149:4	comprising 95:15 130:3 144:13 computer 7:12 92:10 119:19 136:3 concept 20:7 37:5 38:16 39:18 55:19 59:13,16,23 131:18 concluded 154:11 concurrent 11:9 condition 113:14,20 conditions 19:14 89:1 112:16,17 113:9,13,16,19 115:6 116:11 123:16 128:13 132:4,15 151:9 conducted 79:22 conference 144:21 145:4,6 conferencing 144:13,18,24 144:25 145:7,8 145:11,15,21 145:24 146:1,2 146:6,9,13,15 146:16,17,19
--	---	--	---

[confusing - court]

confusing 21:24 confusion 14:3 14:5 42:6 conjunction 47:3 connected 120:21 156:14 connecting 88:12 consequently 115:8 128:15 consider 35:7 36:7 37:9 consideration 65:24 considerations 131:6 considered 23:6,21 24:7 24:25 26:6,12 39:4 considering 22:4 24:20 35:5 37:3 consistent 44:17 console 4:10 38:4,17,25 39:1,3,4 consoles 38:12 38:22 constantly 34:17	constitutes 155:5 constraint 126:15 contain 88:25 contained 10:10 26:20 38:15 contains 90:10 contend 49:23 contending 140:23 142:10 143:1,3,4 content 122:19 123:15 143:19 143:21,22 contents 121:22 122:17 122:23 context 15:3,9 16:5 17:3,5,8 17:23 18:24 21:10 22:7 44:24,25 45:22 45:23 46:3 51:3 61:6 67:15 75:19 92:9 97:16,18 114:2,12 117:12 133:8 144:22 145:4,9 145:16 continued 80:2 controversial 18:7	controversy 156:7 convention 43:18 48:5,20 conversation 69:24 108:1,1 108:8,10,11,13 108:15,20,21 108:23,24 109:3,4,7,9,10 111:20,21 coordinate 33:25 coordinating 34:9,14 coordination 9:15 35:24 copies 7:2 157:14 copy 142:5 core 11:10 111:9,23 correct 6:2 8:20 9:16,24 12:23 13:12,17 18:17 21:1 23:18 27:20 29:11 45:1 49:1 59:8 60:6 71:21 74:16 77:9 86:7 91:15 93:18,19 97:12,13 101:17 103:14 104:13,19	105:2,6 106:11 109:24 117:7 118:22 119:14 123:9 135:19 136:12 138:7 144:19 147:13 149:12,18,19 156:11 159:8 corrections 159:6 correctly 35:13 corresponden... 127:1 counsel 6:22 9:15,19 28:10 30:9,17 32:7 33:5 38:5 67:18 72:15 73:14 156:13 156:14 157:14 county 3:6 couple 6:5 8:11 127:3 144:23 course 6:16 7:16 8:6 30:12 57:21 court 5:11 13:7 13:9 32:11,13 32:19,21 59:2 73:7,9 82:25 101:9,11 104:4 124:15 129:19 129:21 136:1 153:21,23 154:6 156:1
---	--	--	--

[cover - dependency]

cover 5:13 covers 25:16 151:23 covid 5:21 creates 14:3 42:6 creating 132:12 creation 8:23 crews 133:17 cross 19:2 36:17,20 72:6 102:21 current 108:1,8 108:9,13,15,21 108:23 109:3,4 111:21 currently 75:1 79:18 cut 14:16 44:5 46:15,21 65:21 65:23,24 121:20 cuts 85:4	dave 68:2 152:16 david 1:16 3:3 4:7,12 5:2 31:17 33:1 155:1,13 157:5 158:2,24 159:2 159:4,12 day 155:15 159:15 days 8:7 157:16 dc 2:13 deal 114:16 deanna 3:5 156:2,21 decide 132:7 decision 29:4 decisions 110:22 declaration 4:7 4:12 7:3 8:17 8:17,22 9:4,15 9:22 10:3,10 10:14 12:21 20:6 21:16 23:16 25:22 27:4 28:12 30:8 31:13 33:1,10 34:24 47:1 49:21 57:14 61:9 62:3 68:17 73:19 77:24 78:3 80:25 94:8,23 101:15	101:16 103:7 105:19 107:11 109:14 116:22 117:11 119:16 119:21 123:2 123:23 124:12 130:2 133:24 135:16 138:23 139:4,19,24 140:21 141:7 141:12,19,24 142:3,8 147:24 153:3 declarations 27:20,22,23,25 29:20 declare 159:4 dedicated 47:13,16,17,18 48:1,11,13,14 48:14,24,24 50:16,17 51:4 53:13 56:16 58:20,21,24,25 59:6,6 60:3,4 62:15 68:23,23 70:3 73:25 74:2 80:12 104:6,8 117:17 118:6,19,23,25 119:7,7,25,25 120:20,24 121:5,10,11 149:5,15,18 152:2,2,11	deemed 159:6 deeply 61:22 define 48:4 59:15 62:3 95:11 146:1 150:24 defined 64:19 86:15 94:15 123:14 150:3 defines 64:9 66:12 67:7,8 94:3,9 135:12 defining 87:5 94:12,24 definitely 5:15 36:25 definition 44:12,14,16,20 44:20 45:1,20 45:23 46:4 definitive 69:13 definitively 139:21 delay 130:20 135:23 136:9 148:8 delayed 132:5 demand 153:11 demands 153:4 department 56:17,24 57:3 57:15 61:9 62:18 114:21 dependency 140:12
d			
d 4:1 5:1 73:22 data 34:16 87:3 87:13,15,19,25 88:7,10,17,18 88:24,25 90:10 105:24 111:8 111:24 132:3,8 148:3 database 12:15 date 36:23 158:24 159:12			

[depending - digital]

depending 52:4 53:5 96:19,21 129:7 150:23 depends 12:13 35:11 58:11,17 96:22 150:3 deponent 32:17 36:18 66:3 68:8,15 72:19 72:23 101:5 129:12,16,18 152:24 154:8 155:1 157:13 159:3 deposed 6:1 deposing 157:13 deposition 1:16 3:2 7:24,25 8:3 8:9 10:22 31:22 32:5,25 72:11 124:1 154:10 155:2,8 155:10 156:8 depositions 5:12,22 32:1 describe 63:7 79:1 88:18 99:3 146:18 described 16:6 37:16 40:2 44:18 45:14 51:19 52:17 54:6 116:7 130:17 138:16	146:3 147:21 147:23 151:4 describes 14:22 17:14 33:23 55:17 58:1 84:3 115:18 describing 52:5 description 49:18 122:19 design 110:20 110:24 detail 24:12 57:10 58:2 59:17 67:2 95:5 123:22 details 20:8 26:20 37:17 57:24 61:21,22 61:23,24 62:1 detected 95:24 96:3 113:13,14 113:16 determination 23:5,15 24:6 24:20 26:6,13 78:18,23 79:10 79:25 80:16 121:21 123:3 136:21 137:6 148:24 153:8 determinations 124:5 determine 60:21 79:23 92:5 152:11	determined 76:3,7,17 77:9 136:19 137:8 147:10 determines 78:14 79:20 121:16 124:23 153:8 determining 73:23 77:20 80:19 90:19 91:25 104:5 121:8 149:4,4 149:16,17 151:13,25 152:3,7,8,9 development 11:6 device 63:14 113:4,8,12,23 115:2 150:13 devices 20:17 20:24 59:18 62:5 63:19 64:3,5,22 65:2 66:13,15,18,21 67:4,10 112:20 115:4,7 116:13 125:15 128:11 128:15 151:11 devil 61:21,22 difference 93:8 93:21 134:4 135:1,2,5	differences 103:24,25 105:4 117:4 134:18 different 16:2 24:22 25:9 26:1 32:1 34:9 34:15 35:16 36:3 40:25 45:4,6,12 47:16 48:13 50:1,10,15,22 50:25 51:10 55:14,19,20 56:23 61:24 62:15 70:3 73:1,5 87:3,3 87:19,19,23,25 88:4,7,7,14 90:12,13,14 94:21 108:16 111:3 114:7,12 114:13,21 115:5 116:11 122:3,4 128:13 143:2 144:4 146:3 150:1,21 151:8 152:1,10 differently 24:18 108:15 126:12 148:4 digital 33:24 34:16 87:3,13 87:15,19,25 88:7,10,17,18
--	---	--	---

[digital - distracting]

88:24,25 dimensions 36:3 37:14 direct 21:17 117:10 directed 15:20 103:16 directing 42:4 47:8 direction 61:24 directly 62:17 dis 20:7 disagree 17:23 18:3,12 19:6 28:22 disagreeing 17:18 disaster 34:10 34:15 disclose 100:3 133:12 137:14 140:14 142:19 disclosed 49:7 55:14 82:10,16 82:21 84:13,16 93:22 113:4,10 113:11 130:16 131:19 137:19 138:11 139:5 discloses 47:12 50:20 54:2 80:9 84:2 98:23 110:1,10 117:23 120:12 123:8 126:19	130:9 131:14 135:22 136:7 138:21 139:18 139:24 140:4 142:16,16,17 142:24 143:5,8 143:8,10 147:7 151:13 disclosing 118:4 140:11 disclosure 11:17 49:3 50:8 55:3 67:9 70:15 75:8 77:4 78:17 83:24 94:8 115:17 119:12 130:9 131:1 136:25 137:2 149:21 disclosures 110:2 discuss 6:16 46:12 95:20 137:1 145:13 146:8 discussed 39:3 111:25 131:10 discusses 109:14 117:4 119:24 125:2 144:25 discussing 15:21 17:4	discussion 14:21 25:5 36:6,10,15 38:16,16 42:11 42:13 54:7 58:2 67:17 72:22 81:24 85:6 110:3 123:10 124:5 125:8 130:13 discussions 9:19 dispatch 4:10 38:4,12,16,22 40:15 43:25 44:7 46:17 47:19 53:12 80:12 dispatcher 18:24 19:4,21 20:7 39:18,25 40:16 41:19 44:4 46:13 47:17 50:2,9 50:12,22,25 51:6,8,23 52:2 52:7,18 53:13 53:17,21 54:2 54:21,22 55:7 58:15 69:4,10 69:25 70:10,17 70:24 74:17,19 74:24 75:4 79:15 81:13 83:20 85:8	86:16 91:1,11 91:13 92:23 93:2 94:15,17 96:8,13 97:4 98:4 100:11,17 114:19 133:12 133:14,18 dispatcher's 44:6 46:16 dispatchers 16:20,21 17:2 17:6,9,25 18:4 19:8,18,25 39:8,11,14,21 40:10,17 41:4 41:7,10,12,15 42:11 display 39:2 97:11 98:9,14 98:16 99:4,7 99:15,19 100:6 disposes 123:13 distinct 35:25 36:5,9 distinction 139:22 distinctions 18:23 36:22 150:2 distinguished 115:11 116:1 128:18 distracting 127:22
--	---	---	--

[divided - entity]

divided 115:3 150:14 documents 29:22 dogs 36:19 doing 11:16,16 19:10 28:25 29:1 75:19 84:3 doors 127:24 dot 126:21,21 draft 31:11 due 115:6 125:14 128:14 duly 5:3 156:6	electronic 6:23 6:25 7:5 element 48:3,6 48:23 49:2,19 49:22 50:1,10 50:23 68:21,22 71:25 72:2 77:19 83:24 84:23 101:20 102:25 103:1,9 103:18 104:12 104:18,25 105:5,14 116:25 117:5 117:12 118:4 119:15,20,23 119:24 120:12 121:7,8 134:7 134:24 135:17 135:21 136:14 140:21,23 141:22,25 142:4,8,10 143:1,11 elements 103:1 103:4,17 105:24 106:15 123:18 137:18 140:4 142:20 143:2,3 eliminate 124:23 eliot 2:7 eliot.williams 2:10	email 2:5,10,14 2:20,20 emailed 6:21 embodiment 40:1,2 51:22 52:4,4,17 55:5 58:18 61:3 69:7,12,12,15 96:19,21,22 112:1 embodiments 45:13 51:18 52:19 63:8,8 93:2 151:24 emergency 16:22,23 17:4 17:7,8,10,24 18:1,6,6 34:8 35:12 36:2,4,4 41:8 56:14,19 80:13 114:16 114:23 145:12 145:22 emphasize 5:14 7:7 emts 35:18 enable 56:18 encompasses 94:18 encounters 153:4,10 ends 63:3 ensure 138:14 entire 19:12 27:12,17 62:12	63:1 65:11 66:9 141:12 entirety 65:16 66:10 entities 20:17 20:21,24 21:4 47:16 48:14 49:25 50:1,11 50:11,15 51:7 51:11 52:9,12 52:25 53:4 55:15,20,25 56:23 58:5 59:15 61:3 62:4,16 63:19 63:23 64:2,17 64:18,22 66:12 66:14,18,20,24 67:10,12 70:3 97:23 entity 47:19 48:15,25 49:3 49:14,23 50:4 50:4,8,15,18,19 50:24 51:12,14 51:14,21,22,24 52:1,1,6,7 53:18,22,23 54:3,11,14,18 54:21,23,25 55:7,7,9,18 57:4,16 58:1,7 58:21,25 59:7 59:9,11,19,25 60:5,11,12,21
e			
e 4:1 5:1,1 42:25 158:3,3 158:3 e.g. 22:16 47:16 47:19 74:8 91:11 93:2 98:20 119:8 earlier 40:25 43:5 58:4 125:1 edwards 1:18 3:4 effect 138:9 effective 56:19 effectively 93:25 138:18 148:3 either 25:7 53:17 105:1			

[entity - extent]

60:25 61:1,11 61:13 62:8,9 62:13 64:10,15 64:20 68:24 69:3,3,10,16,19 70:6,12,16,17 70:21,24 71:1 71:9,15,16,18 73:25 74:2 91:13,14 104:7 104:8 119:6,8 119:12 120:1,6 120:7,8,10,13 120:16,25 121:10,12 equates 19:8 ergo 41:10 errata 157:11 157:13,16 especially 34:7 141:6 esq 2:3,7,12,17 2:17 essentially 20:25 25:25 35:20,22 43:13 51:19 84:5 105:24 148:22 et 20:24 41:21 41:22 event 48:3,23 64:20 everybody 127:22	evidence 98:14 98:16 99:19 exactly 19:13 40:23 103:5 examination 3:3 4:2 5:5 156:6 examined 5:4 example 16:4 22:15 43:24 45:5 48:17,19 53:20 54:20 56:16 57:13 59:9,24 60:10 60:21 64:13,15 69:12,15,18 70:6,8,10,14,19 70:24 74:23 75:5,9 79:15 80:22 81:12,21 83:19 89:16,21 93:13 94:12 97:5,25 98:5 98:10 99:5 113:10 121:21 123:3 127:17 131:24 132:1 132:14 145:10 147:7 examples 55:25 56:22 57:1,9 59:15 62:4 64:2,22 66:14 66:17,20,24 67:10,12 122:6	122:8,10,11,12 122:17 123:7 except 14:5,19 138:20 excerpts 35:6 exclude 27:15 67:11,14 excluding 53:20 excuse 8:10 36:18 46:24 56:1 74:1 76:10 77:5 105:8 151:20 exercise 76:20 77:12,12 exhibit 4:7,9,11 4:12,15,17 8:18,19 12:24 13:2,12,14 21:16 25:16 26:5,11 31:6,8 31:10,16,25 32:25 33:5,12 37:21,23,24 38:1,6,14 42:2 42:18,19,21 43:2 47:1,8 55:24 62:2 68:17 81:1 83:5,7 85:13 86:10 89:11 90:16 101:15 103:7 107:20 112:6,9,10	113:8 119:21 130:2 133:24 146:22 153:3 exhibits 4:5 6:21,23 7:1 31:7,15 37:24 47:4 exist 146:16 existing 74:25 79:16 exists 125:18 126:4 127:9 129:1 expectation 111:16 experience 5:22 18:16,20 30:23 41:16 43:18 experiencer 40:18 expert 11:1 12:12 29:19 30:8 114:3 expires 155:17 156:17 explain 44:21 141:2,16 explains 34:6 explicitly 22:12 expressly 110:10 extent 19:20 25:13,17 37:2 115:10,25,25 128:17
---	--	--	---

[extra - form]

extra 5:18	figure 79:19	50:8,15,16,17	floor 2:4 46:22
extract 145:25	84:17 97:8,11	50:19,24 51:12	flow 136:20
f	97:12 98:9,14	51:14,14,21,25	137:8
f 83:7	110:21 118:17	52:6,9,24 53:4	fly 111:1
face 41:7	121:2 126:10	53:17,23 55:6	focus 27:15
faced 40:10	126:19,19,22	58:21,24,25	focused 67:4
41:4	136:20 137:8	59:6,7,9,25	123:19
fact 17:21	144:25	60:3,4,11,21	folder 31:7,15
74:21 78:24	figured 68:12	61:11 69:1	31:18,24 37:24
79:10 129:7	find 13:5 27:1,2	70:12,16,16,21	follow 6:7 14:6
failed 29:13	30:21 31:19	71:1,9,13,18	14:7 30:8,20
fails 157:18	fine 28:7 32:16	73:24,25,25	following 99:7
fair 6:9,10	73:3 85:18	79:22 83:11	follows 5:4
14:24 15:19	141:16 151:15	84:5,9 86:13	footer 21:19
21:6 23:2	finish 5:16,17	86:14 90:20	47:9 72:2
27:21 78:12	66:3 68:9,12	91:13 92:1	73:20 80:25
85:7 126:24	72:16 107:9	95:16 96:14,17	83:4,6 85:16
132:25 139:12	152:22	98:21 104:2,3	85:17
153:14	finishing 72:24	104:5,6,6	footnote 55:22
fairly 29:13	fire 35:15 56:16	107:15 109:18	59:14 62:2,20
familiar 15:14	56:24 57:3,14	109:19 110:4	62:23 64:1
37:5 38:14	61:9 62:18	117:16,17	65:5,13
family 12:17,19	firefighters	118:3,6,9,11,14	force 86:15
12:21	34:7	118:16 119:5,5	94:16
far 6:21 68:12	first 5:3 6:5	119:7,8,12	forces 94:14
farther 46:12	10:20,22,25	120:25 121:9,9	foregoing
fast 99:8	16:12 27:15	121:10 130:5	154:10 155:3
favor 30:3	33:22 34:8	137:5 147:1,11	156:11 159:5
feature 44:8	43:25 44:2,2,5	147:18 148:8	forget 8:14
feedback 30:13	44:7 46:14,15	148:11 149:5	58:16 144:6
feel 5:14 7:4	46:17 47:12,13	fit 9:24 111:14	form 9:17,25
feet 126:14	47:17,18,25,25	five 128:2	14:15 15:5,25
127:7	48:11,11,14,15	flag 95:23 96:2	17:12 18:2,11
field 18:16 57:9	48:24,25 49:3	flavor 85:9	18:25 19:9
133:17	49:14,23 50:4		20:3 22:8,10

[form - go]

23:1,23 24:8 25:1,20 26:7,8 26:15 27:7 28:7,8 30:10 37:11 38:23 39:9,23 41:5 41:14,18 45:2 46:20 49:5,16 49:24 51:1,16 52:11 53:2,19 54:4,19 55:16 56:25 57:17 58:10 59:12 60:7,14 61:14 64:11 65:3,9 65:19 66:1,5 66:25 67:13 69:5,20 71:22 74:18 75:23 76:8 77:10,16 78:11,25 82:1 82:18 83:17 84:1,15 85:5,9 86:23 87:12,17 88:2,21,21 90:5 91:2,20 92:7,16,25 93:10 94:10 95:3 96:9,18 98:25 100:14 106:1,9,13,18 106:25 107:6 108:6,12,25 110:11,18 111:22 114:9	118:25 119:3 120:15 122:7 123:12 125:22 126:6 127:13 128:22 130:11 131:3,17 132:20 133:5 133:16 134:10 135:4 136:16 137:15 138:8 138:25 139:7 139:15 140:2,9 140:17,25 142:12 143:6 143:17 144:5 147:20 148:12 149:11 151:16 152:4,13 153:13 156:10 formatted 148:3 forming 95:15 forms 25:21 26:2 39:12 105:23 forth 143:24 144:3 forward 99:8 found 29:3,9,12 135:7 foundation 38:6 four 35:14 121:3	fourth 81:1 frankly 60:17 free 7:4 front 13:12 15:17 32:24 68:19 98:10 99:15 100:6,7 111:25 112:8 full 150:20 function 7:18 114:18 functional 20:17 63:19,23 64:5,15,19 65:12 66:7,22 67:11 functions 99:4 99:7 further 34:14 53:21 95:15 98:3 130:3 153:15,25 future 48:22	generated 151:23 generating 151:19 generation 151:22 getting 24:15 35:15 57:9 65:21 give 6:4,11 31:1 37:20 88:4 100:8 141:17 142:6 given 137:24 137:25 159:9 giving 31:1 33:13,14 go 13:4 15:6 28:11 31:17,23 32:1,7,9 38:24 39:24 43:15,23 55:21 58:13 68:3,14 73:6 76:9 83:6 86:25 89:12 90:24 92:21 93:11 94:4 95:4 99:9,12 100:21 103:22 107:10 113:3 114:14 117:8 121:2,7 123:17 124:9 125:24 129:10 133:20 135:15 144:9
		g	
		g 5:1 gate 127:24 gates 2:18 127:18,20 general 12:7 25:8 generally 30:1 30:18 35:4 43:13 47:2 130:14 142:18	

[go - hypothetical]

144:12,23 148:23 149:2 150:10 152:14 154:4 goes 22:17 130:12 145:13 going 5:13 10:24 11:14 21:13 30:21 31:6 33:4 34:12 37:21 38:5 43:19 47:3 54:7 58:3 58:14,16 59:20 67:18 70:4 72:17,21,24 83:6 85:12,15 90:11 100:17 110:24 111:1 111:11 127:20 127:21 133:21 133:22 136:2 141:15,17 142:5 good 5:7,20 21:14 72:18 101:4,8 153:20 gotcha 21:21 gotten 48:2 gps 11:10,11 great 7:4 ground 6:5 117:9 139:5,11 139:14 140:4,6	group 1:9 12:20 32:2 56:16,23 59:16 62:4 157:4 158:1 159:1 guess 5:20 18:13 21:2,24 27:9 48:8 49:9 58:15 62:1 79:5,12 87:23 93:15,15 98:13 99:12 128:20 136:25 guide 28:16 guys 123:19 h h 42:25 158:3 habit 30:25 hagai 42:25 half 14:20 32:6 144:14 halfway 144:15 hand 96:25 handle 16:21 17:6,10,25 18:5 handy 42:2 happens 52:16 happy 24:10 68:6,11 hardware 20:18 63:20 64:6 65:12,17 66:8,23 67:12	harmony 115:7 125:14 128:14 hate 134:11 head 19:23 20:2 30:6 40:3 46:5 93:12 94:5 102:23,24 124:7 header 47:22 48:3,6,10,10 73:22 85:21 103:7 105:8 144:12 heading 149:3 hear 34:20 44:2 122:14 heard 6:8 14:19 50:13 129:9 143:25 hearing 131:19 hearsay 33:5 38:7 help 41:10,12 100:3 107:9 helped 83:2 helpful 125:23 herd 35:20 hereto 159:7 hey 67:7 high 11:6 61:25 higher 83:11 84:3 89:4 102:14 107:15 107:17 109:18 110:4 111:4,5	146:25 147:2 148:7,15,20 highest 101:23 102:9 103:10 103:19 117:1 136:18 138:14 hillard 157:5 158:2,24 159:2 159:4,12 hilliard 1:16 3:3 4:7,12 5:2 155:1,13 hoc 33:24 35:21 36:13,15 37:15 hold 142:1 honestly 9:1 hope 59:21 hopefully 5:22 149:1 hoping 67:24 hour 6:15 67:19 72:17 154:11 hours 8:4 9:9 154:12 hubbard 2:17 5:11 huge 150:20 hundred 12:16 139:1 hypothetical 37:19 40:23 61:20
--	---	--	--

[idea - intensity]

i	important 7:9 141:11	incorporate 61:3	90:12 99:6,24 117:16 118:4,5
idea 35:19 39:5 52:13 101:4	improper 28:12 141:8	incorporated 138:16	118:12 120:4 120:22 123:15
ideas 52:14	improperly 29:9	increase 128:21	131:7 132:7 147:18
identical 90:8 103:23 134:17	inanimate 57:23	incredibly 127:21	informed 100:10 113:18
identification 118:2	include 10:14 20:21,24 21:4 27:4 47:14 58:5,8 62:4,13 63:13,23 64:15 66:6,8 67:2 94:8 131:7 134:7 138:6 149:17	independent 102:19,22 115:1 150:13	informing 96:13,15 130:4
identified 71:19 91:9 120:24 149:9	includes 63:2 64:12 66:14,17 66:20 69:15 95:1,8 97:11 124:10	independently 115:4 125:13 128:12	informs 98:16 99:20
identify 51:14 54:11,14,17 83:15 118:3,11 118:15 120:3,6 120:7 143:2	included 25:11 28:1 59:10 60:12 61:13	indicates 96:3	initiated 79:24
identifying 118:16	including 20:17 23:9 51:6 55:18 63:19 88:19 108:1,20 111:20 145:1	indicating 113:12	input 91:6 92:17,22 93:2 94:12,24 145:1
illinois 2:19	incoming 14:4 42:7 148:21	indication 80:13 123:18	inputs 90:21 91:19 92:1,6 92:11,22,23 94:23
illogic 82:4	incongruity 148:4	individual 47:16 50:2,8 50:11 53:4 69:8,22 70:20 71:12,17,19 81:20 82:11 115:2,10,25 121:4 128:17 146:4 150:6,14 150:25 151:19 153:6	inquiries 79:22
illustrate 59:13		inform 98:19 131:10	inquiry 79:22 79:25
illustrated 79:19		information 81:5,15,23	insert 5:17
image 88:11,14 88:20			instance 59:10 114:8
imagine 11:11 150:4			instances 45:5 45:13
immediately 81:15 86:15 94:14,16 113:18			institution 29:4
implemented 92:10			integral 11:12
importance 123:15			intended 25:24
			intending 40:13
			intensity 89:5

[inter - kantarek]

inter 4:8,13 31:14 33:2 interest 11:13 11:17 interested 156:15 intermediate 79:23 intermix 144:8 intermixed 130:22 intermixing 116:12 129:6 151:10 intermixture 124:24 125:18 126:4 127:9,12 128:21 129:1,3 136:10 137:10 interpreted 79:21 interpreting 78:16 interrupt 72:3 interrupted 52:6,18 69:10 74:23 79:14 81:13 83:19 100:9,12 interrupting 80:1,4,6,7,17 81:24 83:25 84:9 85:8 95:25 96:5 110:8	interruption 83:16 84:12 interrupts 109:19 110:4 interviewed 12:3 invalidates 138:17 invalidating 70:15 invalidity 34:24 invention 20:15 20:16 40:11 63:18 81:2 107:21,25 108:19 111:19 112:14 114:1 116:5,8 145:10 145:20 151:5 inventions 57:9 inventor 42:24 involve 35:12 40:13 involved 27:19 29:22 30:4 49:25 50:11 51:7 84:18 94:12,24 involves 38:12 38:22 39:7,14 39:21 ipr 10:17 12:7 12:8 27:23,25 28:20 29:20,21	30:8 32:2 ipr2023-01292 1:13 iprs 12:11,16 27:19 issue 24:18 41:18 73:6 125:18 126:3,3 127:9 128:25 issues 5:12 43:21 item 49:22 items 106:4	29:8,19 30:7 31:3,23 32:9 32:15,18,23 33:8 35:5 36:7 37:3,20 38:8 39:6,13,19 40:5 41:11 42:1 45:16 46:25 49:9,20 50:3 51:9,25 52:21 53:7,24 54:9,24 55:21 57:2 58:3,19 59:4,5,20 60:9 61:17 64:14 65:7,15,23 66:11 67:5,20 67:23 68:6,10 68:16 69:14 70:11 71:23 72:20 73:1,11 76:5,14 77:14 77:19 78:13 79:3 82:5,20 82:24 83:3,21 84:6,19 85:11 86:25 87:14,22 88:16 90:6 91:23 92:13,17 93:3,15 94:18 95:6 96:12,20 99:12 100:21 101:6,13 106:14,19 107:2 108:9,17
		j	
		japanese 113:11 jefferson 3:6 jennings 4:11 jog 125:7	
		k	
		k 2:13 k&l 2:18 kantarek 2:17 4:3 5:6,9 9:20 10:2 13:11 14:18 15:13 16:9 17:15 18:9,15 19:7 19:16 20:9 22:13 23:3 24:5,14 25:15 26:4,10,25 27:18 28:5,14 28:18,23,24	

[kantarek - line]

109:6 110:14 111:2 112:5 114:13 120:18 122:9 123:20 124:16,17 125:23 126:18 128:9,25 129:10,13,17 129:23 130:15 131:9,22 132:23 133:9 133:20 134:13 135:6 136:4,6 136:17 137:18 138:20 139:3,9 139:18 140:3 140:15,20 141:4,9,21 142:25 143:9 143:19 144:9 145:20 147:23 148:14 149:13 151:25 152:6 152:18,25 153:2,15,20 154:5 kate 8:14 kate's 8:15 katharine 2:12 katharine.bur... 2:14 keep 21:12 28:8 51:11 135:16 142:1	keeps 142:6 kind 11:15 12:5 12:13,17 14:16 18:13 19:1 45:5 46:22 48:19 57:10 61:15 68:9 69:11 76:19 82:3 88:3 109:1 110:25 111:16 119:17 126:14,25 127:7 144:6 kinds 5:23 kings 31:11 kinks 5:23 klgates.com 2:20,20 know 5:21,23 6:21 7:5,8,8,21 8:12 10:17 12:16 13:1 16:2,17 17:17 19:11 20:11 21:16 22:3 23:8,25 24:1,2 25:6,6,8,9 26:17,17,22 27:8 28:2 29:10,14,18,18 30:5 31:9 34:19 35:14 36:23 37:1,25 38:15 40:6,21 41:21 42:20	43:16,17,21 44:16 47:5 49:6 56:10 57:20,23 60:15 70:23 77:12 85:13 86:10 89:12 99:3 100:18 105:20 108:15 114:10 126:25 127:6 139:1,4 141:13 142:21 150:21 152:22 knowledge 29:7 known 143:15 143:18,20,22 kyle 2:17 5:9 kyle.kantarek 2:20 I I 42:25 label 68:21 labeled 73:23 lacking 29:4 language 47:23 60:1 78:14,21 91:18 92:6 94:22 124:13 large 27:19 law 25:9,24 lawyer 25:14 layered 28:19 leads 122:20	leap 100:5 led 11:6 legal 23:10 25:7,14 26:3 26:18,19,20,22 157:23 level 31:24 57:10 58:1 59:17 60:18 61:25 67:2 likely 40:18 limitation 67:15 72:25 73:23 83:7,10 98:23 103:14 limitations 55:5 limited 88:11 88:19 89:3 125:18 126:4 126:11,22 127:10,19 128:6 129:1 limiting 69:11 line 13:24 14:1 14:21,25 16:13 16:14,15,16,20 20:10,13 42:4 61:8,8 62:11 62:19,23 63:3 63:3 65:16,17 66:17 68:9 72:16,24 73:2 81:1 86:13 87:1 89:12
---	--	--	---

[line - matched]

112:14,24 113:3,7 114:25 116:4 128:10 133:19 150:9 150:11 151:21 158:4,7,10,13 158:16,19 lines 56:3 62:7 63:2 115:14,17 125:24 126:2 linkage 92:12 list 64:4,23 66:23 103:17 103:24 140:21 141:21,24 142:3,8 listed 48:6 122:11 listen 16:8 45:17 48:18 59:21 70:5 86:15 92:19 94:14,16 listeners 130:23 listening 80:15 lists 103:9,18 124:12 literally 32:5 little 5:18 7:23 8:16 10:16 15:13 22:1 24:18 58:4 73:3 87:23 93:3 109:2	111:3 113:6 114:21 121:20 125:1 144:14 144:17 live 144:3,7 llc 1:9 llp 2:3,8,12,18 locale 59:16 localities 56:23 locality 56:16 62:4 location 11:7 11:12 lock 52:15 log 32:6 logic 100:5 logical 41:23 logistics 127:6 127:24 129:8 long 8:2,21 49:11 53:5 longer 68:3 73:3 look 33:22 35:11 38:25 63:1 64:24 65:8 74:21 76:11 77:3 89:11 93:11 95:4 97:21 102:12 106:22 109:13 114:24 116:4,19 118:17 126:19 131:22,23	133:23 144:12 150:8 152:25 looked 27:17 37:13 57:19 65:11 67:6,9 looking 7:7,8 31:11 43:15 62:22 71:8 73:12,18,22 76:12,14,16 77:3 110:21 119:18 136:2 142:18 looks 38:14 loose 65:10 lose 144:8 losing 111:10 loss 81:4 lost 14:9 46:10 46:19,24 103:12 lot 12:13,17 24:12 90:10 100:17 lots 36:2 lower 83:25 85:4 104:15 109:14 130:20 132:1 133:25 134:21 135:23 136:8 138:11 lunch 67:23,25 68:4,11,13 73:3,4,5	m macro 150:22 made 80:1,17 155:8,10 159:5 madison 2:18 main 78:3 major 151:1 make 9:6,23 10:3 22:20 23:24 24:18 30:25 43:19 110:9,16 makes 59:14 75:16 81:19,23 82:2,2,6 110:6 making 23:20 malls 56:18 manage 35:20 managing 35:20 145:11 145:21 manually 35:21 map 49:3 mapping 49:7 49:18 mark 31:6 37:21 marked 8:19 13:2,15 31:7 31:10,15 32:25 37:24 38:1 42:18,21 112:9 matched 52:3 52:25
---	--	--	---

[matching - messages]

matching 52:9	139:10,24,25	98:21 99:20	148:7,11,15,20
matt 8:14	141:18 146:7	101:22 102:9	149:5,6 150:13
matter 8:18	146:14	102:12,13	151:6,11,19,23
11:22,25 12:3	meant 151:15	103:9,10,19	153:5,5,7,7,9
17:18 35:7,8	mechanisms	104:5,7,15,21	153:11
36:8 37:18	93:1	107:14,15,16	messages 7:13
38:18 125:6	meeting 7:16	107:16,17	7:19 14:2
140:21 141:22	meets 53:6 54:5	108:4,5 109:19	15:11,12 16:7
142:4,8	55:3 76:24	110:5 111:3,5	16:10,23 18:6
matters 10:20	memorize 40:4	111:6 112:2,3	34:17 40:14
106:23 156:7	124:8	112:4,20	41:7,16 42:5
mean 12:13,20	memory 125:7	113:15,17	47:18 48:15,25
15:6 18:15	153:7	115:2,4 116:8	50:17 58:25
21:20 22:21	mention 36:23	116:13 117:16	59:7 60:4
24:17 25:3	71:6 105:5	118:3,9,11	68:24 70:1
27:9 28:7 30:2	117:5 131:2	119:25 120:4	75:10,10,12
38:13 39:1	mentioned 5:12	120:22 121:9	82:10,16,22
44:22 52:13	13:14 43:6,6	121:11,16	84:8,8 85:25
53:22 57:8,10	58:8 75:4	122:1,5,20,20	89:16,17,21,22
57:11 68:8	118:20	122:23 125:12	89:23 90:3
76:18 78:2	message 7:15	128:11 130:4,5	99:25 100:4
79:4 82:2,3,5	14:4,8 42:7,7	130:5 131:11	104:3 105:15
88:3,5,5 92:17	47:13,25 48:11	132:2,16	112:15 113:10
108:14 109:1	68:22 69:1,1	133:25 134:1,8	114:16 115:5,9
110:6 129:5,8	70:2 71:13	134:20,22,25	115:10,21,24
133:17 139:19	73:24 74:1	135:18,22	116:1,10,12
144:21 145:4,9	80:7 83:10,12	136:7,18,21,22	117:1 118:14
145:15 150:4	84:2,9 87:10	137:2,5,5,7,11	118:16 119:8
meaning 26:20	88:16,22,23,25	138:14 142:20	120:1 121:22
76:18 88:4	89:7,18 90:7,9	142:21,22,24	122:13,16,18
means 18:13	90:11,20,20	143:13,25	122:18,23
26:13 35:22	92:1,1 95:16	146:24,25	123:14 124:19
75:21 76:6,12	95:17,17 96:14	147:1,1,2,8,9	124:24 125:13
77:8 105:15	96:15,15,16,17	147:11,11,14	125:19 126:5
106:14 108:14	96:17 98:17,20	147:18,25,25	127:5,12 128:2

[messages - need]

128:12,16,17 130:19,22,23 131:20 132:12 136:11 138:11 143:15 144:3,8 145:12,22 148:6,21 151:8 151:10 153:12 met 49:19 metadata 99:24 metes 95:11 method 34:6 82:10,16,21 85:23 90:18 91:24 95:14 107:13 112:14 112:19 116:9 124:13,17 130:3 146:24 149:3 151:6 methods 33:23 microphone 119:19 mid 65:21 middle 21:19 113:6 mids 65:21 military 34:7 mill 2:8 mind 18:23 110:2 mine 31:24 minimized 5:23 minor 103:24	minute 32:16 minutes 67:24 101:5,6 129:15 153:18 154:12 mishearing 124:24 misleading 113:6 missed 56:10 105:10 missing 134:15 mix 115:9,24 128:16 mixed 52:3,25 mixing 52:8 132:21 mode 121:17 123:8 149:17 modes 123:4,4 module 145:2 modules 144:25 moment 56:9 month 10:22 morning 5:7,8 mother 70:23 71:2,6 motorola 1:6 4:9 10:19 11:10,15,20,22 11:25 29:22 30:4 31:18 32:2 38:3 157:4 158:1 159:1	mountain 32:16 mouth 34:21 move 34:21 83:4 90:15 112:5 119:15 119:20 120:18 143:9 146:21 148:25 moving 71:23 74:7 80:24 85:11 97:7 142:1,6 msi 157:5 158:2 158:24 159:2,4 159:12 mst 3:5 muffled 136:3 muffling 119:17 multi 54:7 multichannel 111:8,24 multiparty 45:10 multiple 14:2 15:11 16:7,10 40:19 42:5 43:13 58:12 105:24 110:21 111:10 115:20 118:17 121:1,1 127:20 133:7,7 150:23	muted 14:8,8 muters 14:5 mutual 11:13 n n 4:1 5:1 126:9 149:23,25 nagging 12:5 name 5:9 8:15 names 8:12 naming 48:5,20 naturally 30:13 30:21 nature 20:7 51:2 near 124:12 nearly 103:23 134:17 necessarily 26:16 30:22 69:9 89:2 111:12,14 112:3 124:2 126:13,14 127:15 128:4 necessary 64:20 65:6,14 159:6 need 5:14 6:16 16:7 31:17 34:17 37:22 57:22 68:2 100:12,24 128:5 129:6,12 132:7 141:13
---	--	---	---

[needing - objection]

needing 128:7 needs 14:3 15:11 42:6 53:6 55:3 neighborhood 9:11 network 11:8 33:25 35:21 networks 36:13 37:15 new 2:4,4 72:25 news 5:20 nextel 11:9 nextel's 11:7 nigawara 4:17 107:10 112:6,8 112:13 115:15 115:18 116:20 116:21 117:8 117:22 118:12 118:15 120:8 120:12 121:15 123:8,11,13,22 124:6,23 125:2 125:8,9,21 128:10 130:9 130:17 131:1 131:11,14 132:11,18,22 133:1,3,12,15 133:18 135:22 136:7 138:10 138:16 143:4,4 143:7,10 147:7 148:21 150:1,9	151:3,13 152:6 152:9,11 nigawara's 113:24 118:3 119:11 123:19 133:2 137:1 143:15 149:20 153:4,10 nod 117:20 nodding 117:19 nolan 2:17 5:11 nolan.hubbard 2:20 normal 30:12 132:3 notary 3:7 155:20 156:3 156:22 159:13 159:19 note 157:10 noted 159:7 notes 10:8 156:12 notice 3:1 5:10 noticed 10:5 noun 83:18 november 156:17 number 4:11 4:17 6:1 8:19 10:5 12:15,25 13:2,16 23:17 27:19 31:10,14 33:2 36:9 38:1 39:12 42:21	81:3 105:9 112:9 118:18 125:19 126:4 126:11,20 127:1,3,4,5,10 127:19 128:6 129:1,2 numbers 43:20 85:16 113:11 numeric 66:9 nurse 57:7 61:5 nurse's 58:9,14 58:16 59:11 60:13,23 61:12 nw 2:13	35:1,9 36:11 37:11 38:23 39:9,23 41:5 41:14 45:2 46:20 49:5,16 49:24 51:1,16 52:11 53:2,19 54:4,19 55:16 56:25 57:17 58:10 59:12 60:7,14 61:14 64:11 65:3,9 65:19 66:1,4,5 66:25 67:13 69:5,20 70:9 71:22 74:18 75:23 76:8 77:10,16 78:11 78:25 82:1,18 83:17 84:1,15 85:5 86:23 87:12,17 88:2 90:5 91:2,20 92:7,16,25 93:10 94:10 95:3 96:9,18 98:25 100:14 106:13,18,25 108:6,12,25 110:11,18 111:22 114:9 120:15 122:7 123:12 125:22 126:6 127:13 128:22 130:11
		o	
		o 5:1 42:25 83:1 oath 155:3 oaths 156:4 object 33:4 38:6 39:16 116:7 151:5 objected 28:14 objection 9:17 9:25 14:15 15:5,25 17:12 18:2,11,25 19:9 20:3 22:8 23:1,23 24:8 25:1,20 26:8 26:15 27:7 28:3,13,16,17 28:20,20 29:5 29:16,23 30:10	

[objection - okay]

131:3,17	141:14,23	69:22 70:1,12	69:7,15 70:7
132:20 133:5	142:5,9,10,16	70:15,20,22	74:15,17,21,22
133:16 134:10	142:17 143:4	71:11,20 81:20	75:5,25 77:2
135:4 136:16	149:15	81:22 86:15	78:9,17,23
137:15 138:8	obviously 25:3	94:14,16 96:11	79:9,12,19
138:25 139:7	35:12	96:16 97:4,14	80:9,16 81:1
139:15 140:2,9	obviousness	97:17,19,20,22	81:12 83:23
140:17,25	22:2,3,4,7 23:5	97:22 98:11,15	84:13 86:7,9
141:6,20	23:15 24:1,20	99:15 100:7,9	91:10 93:18,23
142:12 143:6	24:21 25:5,11	officer's 44:5,7	94:1,2,4,9 95:9
143:17 144:5	25:18,22 26:1	46:14,15,17	96:8,13,24
145:18 147:20	26:2,6,7,13,14	51:3 71:2 81:8	97:3,21 98:19
148:12 149:11	28:1,25 29:1	81:14,24 100:8	98:22 100:12
151:16 152:4	99:22 137:16	100:12	107:20 108:19
152:13 153:13	137:23 138:7	officers 44:1	109:23 110:9
objections 28:6	138:18 139:5	47:17 50:2,8	110:15,20
28:9	139:10,11,14	50:12,22,25	111:6,8,14,19
observing	139:17 140:6	51:6,8 55:11	112:7 117:13
132:4,15	140:10,19	55:12,13	146:23
obvious 10:8	142:14	oh 21:20 33:18	ohel's 50:8
22:24 23:17	occurrence	34:23 58:23	53:12 70:14
24:6,9 47:12	113:13,18	68:6 72:5	75:24 81:21
50:7,7,24	odds 30:2	84:24 100:23	91:13 92:9
52:10 53:1	offers 41:12	102:1,4 112:25	94:19 95:1,20
54:1,17 69:19	office 1:1 57:6	124:16 125:5	okay 7:9,10,23
70:7 83:24	58:9,13,14,16	125:10 129:13	16:19 20:14
96:13 98:19,24	59:11 60:13,13	140:20 143:9	26:25 28:18,23
100:2 110:2,3	60:22,23 61:12	ohel 42:19,25	31:3 32:18
111:6 131:6,16	61:12	43:2,15 45:20	38:2 47:10
131:21 137:14	officer 43:25	46:6,9 47:11	50:3 51:25
137:20,25	44:2,3 46:7	49:2,22,25	56:10 59:1
138:3,4,23,24	51:20,21,24	50:6,19,23	65:10 68:15
139:10,13,19	52:1,5,6,17,18	51:2,14 53:25	72:13,14 73:2
139:24,25	54:25 55:6,9	54:5,17 55:2	73:21 80:15
140:5,15,22,23	57:7 69:4,8,9	55:14 67:3,15	85:22 86:13

[okay - overtalk]

90:17 101:18 105:11,12,22 107:12 112:5 113:1 116:23 118:1 119:22 130:24 139:9 144:11 145:8 146:19 152:24 154:6 old 31:21 once 76:25 ones 120:24 128:3,3 ongoing 79:20 open 7:13 31:8 37:25 42:17 47:2 56:5 86:9 135:16 opened 27:10 operate 20:16 63:18 115:4 125:13 128:11 operates 55:4 operating 112:15,17 113:9,12,14,16 113:19,20 114:5 115:5 116:11 128:13 132:4,15 151:9 operation 63:14 114:22 121:17 123:4,4 123:8,16 149:16 151:21	operational 115:7 125:14 128:14 operations 150:21 operator 14:3,5 14:7 15:1,4,7 15:10,23 16:2 16:3,6,10 18:23 19:2,20 20:5 42:6 95:15 96:7 98:16,20 99:20 100:11 113:25 113:25 114:8 130:4,10,16 131:5 132:4,11 132:13,14 133:4 operator's 131:15,15 operators 16:21 17:2,6 17:10,25 18:5 19:8,18 20:1 113:17,24 114:7 115:11 116:2 128:18 130:13,17,22 130:25 131:2 131:11,18 132:6,17,19,19 132:19 133:2,3 144:4	opining 50:6 opinion 17:2 18:8,14 19:7 22:2 24:21 25:14 50:20,23 52:8,24 53:3 53:16,25,25 55:11,15 56:22 69:3,14,15 71:2 74:12,14 75:16 77:5 78:6,21 79:7 80:19 83:23 90:2,25 91:10 96:12 108:11 127:8 138:7 148:2 opinions 10:10 10:12 19:17,24 29:4,9,12 30:9 opposed 41:24 45:10 opposite 110:10,15 129:7 option 75:22 order 106:5,15 106:23 108:4 121:22 123:3 124:23 128:7 130:21 135:24 136:9,19,21 137:6,7 138:12 147:9,12 153:8	orders 122:3 ordinary 62:16 76:18 organizations 34:9,15 original 8:23 49:17 130:12 outcome 156:16 output 121:16 122:1,5,23 153:5 outside 28:4,11 28:13 29:6,17 30:11 33:6 35:2,10 36:12 37:12 38:7 overall 30:23 31:24 42:13 43:16 49:17,18 51:2 57:8 82:12 111:14 114:6 142:13 overarching 142:13 overlapping 40:14 41:7,16 69:1 70:2 84:7 148:6 overtalk 43:7 43:10 44:9,12 44:15,17 45:1 45:5,15 46:7 85:3,7,10
---	--	---	--

[overview - part]

overview 33:21 own 15:24 152:2,2,10 owner 1:10 2:16 3:4 owners 12:8	123:2 124:11 129:11 130:1 133:23,23 135:15,16 144:10 146:22 149:1 153:3 158:4,7,10,13 158:16,19 pages 27:15 33:11 85:12 155:5 palo 2:9 paper 6:22 7:2 papers 56:9 paragraph 13:24 21:18,20 21:21 22:14 27:2,16 33:9 33:17,18 34:5 34:13 35:6 43:16,20,22 46:11,13 47:7 47:9,11,23 51:19 53:8,8 53:11 54:7 55:22 62:2,12 63:2,6 68:17 69:21 71:19,23 73:19 74:6,22 75:7 77:3 79:5 79:13 80:9,24 82:8 83:15 84:7,20,24,25 85:12 86:3,7 86:10 87:1,2	90:24 91:4,16 92:4,22 93:24 94:1,11 95:14 95:20 96:24 97:7,21 98:18 99:1,23 103:9 103:22 105:3 105:19,22 107:3,21,24 108:18 109:13 109:17,25 110:1 113:5 114:24 116:5 116:21,22 117:4,9,11,15 118:2 119:6 120:3 121:15 124:10,11,22 131:23 133:24 134:7,16 135:21 136:6 137:1 138:10 143:2 147:6 148:5,14,18,19 149:1,2,14 153:1,2 paragraphs 22:9 25:17 26:4,11,21,24 37:4 49:7,15 49:19 78:4 79:1 94:7 98:15 99:19 130:18 135:7 138:2,5,6	parallel 151:21 parameter 74:3 74:8,13,15 75:9,16,18,21 76:1 77:6,17 77:18,21 78:9 78:15,22 80:3 80:23 85:24 89:15,20 93:6 93:9,13,16,21 104:4,9 121:12 124:14,18 parameters 87:5,21 123:14 paraphrase 22:12 23:13 24:4 54:6,7 paraphrased 96:1 paraphrasing 23:11 88:6 134:11 parenthesis 121:25 part 11:12 17:13 19:14,21 20:6 23:11 24:21 25:4 26:13 28:6 42:14 46:8 49:22 51:18 54:1 57:1 58:1 58:24 65:11,13 66:6,9 67:16 71:3,7 78:21
--	--	--	---

[part - phones]

82:11 106:15 106:16,16 117:3 125:2 150:22 151:3 partes 4:8,13 31:14 33:2 particular 15:8 16:5 17:3 19:4 26:23 31:18 35:13 44:24,24 45:22 51:3 52:4,16 53:5,6 53:20 54:20 55:5 58:18 79:2 84:17 131:4 132:14 142:19 particularly 30:19 40:14 93:24 100:17 112:18 128:3 140:11 150:4 parties 156:8 156:15 partner 11:5 parts 40:25 41:15 114:5 pass 152:19 passage 15:9 16:5,9,12 17:13,16 19:4 20:21 21:4 40:4 42:14 62:10 66:20 131:4 150:24	past 31:21 109:10 paste 142:5 patent 1:1,3,10 1:14 2:16 3:4 4:8,11,11,14,15 4:17,17 10:17 10:21 12:8,15 12:21,25 13:15 13:19,21 14:13 14:22 15:3,14 15:17,24 17:5 17:9,24 18:17 18:24 19:3,8 19:12,17,25 20:10 21:13 22:5,23 23:17 27:17 29:3 31:14 33:2,21 33:23 34:6,14 34:25 35:7,8 35:13 36:8,8 36:21,21 37:8 37:9,13 38:12 38:20,21 39:7 39:14,15,17,20 39:22 40:7,9 41:3,25 42:2 42:12,23 43:12 47:24 50:7 54:1,15,18 55:25 56:6 58:20,23 59:5 59:14 60:3 61:7 62:3 64:2	64:9,12,15 65:11 66:17 67:7 75:8 77:7 89:11 93:22 113:11 114:8 114:11,19 116:20 119:13 120:11,14 133:3,4 144:22 145:4,5,7,9,16 146:2,7,14 patent's 77:4 patents 7:3 12:20,22 22:17 22:21 71:6 patient 56:13 paul 2:22 pause 5:18 99:8 paused 31:5 pdf 33:14 peer 63:13 65:18 pending 6:18 72:9 people 35:15,17 40:19 43:13 51:5 58:17 69:13 94:19 95:1,8 114:4 127:23 143:23 percent 139:2 139:21 perform 114:18 performing 99:4	period 10:23 periodically 104:21 134:1,8 134:21,25 135:17 138:13 142:22 143:12 permit 108:4 permits 107:25 108:19 111:19 permutations 94:21 person 45:7 62:16 70:22 71:10 75:25 83:1 perspective 26:3 126:17 perspectives 127:3 pertaining 115:5 116:11 128:12 151:8 petition 4:7,13 31:14 33:2 petitioner 1:7 2:2 22:22,22 petitioners 12:8,10 philosophy 110:20,23 phone 2:5,9,14 2:19 71:12,20 97:24,24 phones 11:10
--	---	---	---

[phrase - posita]

phrase 23:25 24:3,17 25:3 105:13 108:14 phrased 23:9 40:23 phrases 83:18 phrasing 24:19 108:17,18 111:25 pick 21:24 24:22 25:3,6 29:9 117:20 146:4,17 piece 24:20,24 25:4 27:6,12 40:25 99:24 place 98:5 109:10 156:9 places 25:24 40:16 56:18 142:15 144:24 plain 76:18 plant 112:16,16 112:18,19 113:9,10,13,18 114:3,5,6,11,22 115:3 116:9,10 116:14 117:18 118:7,18,20 119:8,12 120:16,22 121:4,6,17 123:4,4,7,15 126:13 127:1 128:1 130:13	131:10 132:5,8 132:14 149:10 149:10,15,17 149:18,20,22 149:24,25 150:3,4,5,7,15 150:16,18,19 150:20,21,22 150:24,25 151:7,7,11,14 151:14,15,18 151:22 152:1,1 152:3,10,10,12 plants 126:9 127:4 149:22 150:1,6,6,23 151:18,18,20 151:22 153:6 play 61:4 99:8 107:25 108:15 108:20 111:20 137:12 142:22 142:23 playback 80:8 108:4 played 84:8 99:6 104:22 107:17 109:19 110:5 111:6 134:2,9,22,25 135:18 137:3 137:12 138:15 143:13 147:3 148:11	player 145:1 playing 83:10 84:2 95:16 96:14,16 98:21 99:25 100:4 101:22 102:2,8 102:12,13 103:10,19 105:16 107:14 107:14 108:7,9 108:10,13,23 108:24 109:2,4 109:6,7,7,9 117:1 130:5 131:20 142:20 143:12 146:24 146:25 plays 52:20 plaza 2:4 please 16:17 43:20 56:6 101:15 plural 147:7 153:4 plurality 16:23 47:14,15 48:12 48:13 56:14 68:24 70:3 112:20 116:12 145:12 151:10 plying 101:25 pnw 157:15 point 10:7 11:4 11:18 27:10 30:4 77:24	81:16 89:8 93:14 96:2,3 100:24 133:11 139:20 144:1,7 pointed 78:9 pointing 83:5 points 8:11 police 34:7 35:18 43:24 44:4 46:13 47:17 50:2,9 50:12 51:3,6,6 51:7,20,20 52:5,6 53:17 54:2,25 55:6,9 69:4,9,22,25 70:12,15,17,21 81:8 96:10,15 97:4,14,16,19 97:20,22 98:4 98:11,14 114:20 poor 71:3,6 portion 7:9 34:4 51:11 56:13 67:4 portions 24:23 posita 82:9,15 82:20,25 87:2 87:9,14,18,24 88:6,12 92:8 94:3 98:19 99:23 110:14 110:17 111:15 126:8,17 127:8
--	---	--	--

[posita - priority]

127:11 128:5 131:6,20 137:9 142:18 148:2 149:16 position 63:22 63:22 70:11,14 91:16 98:22 108:22 119:2 119:11 130:15 130:24 131:14 140:7 141:10 positions 141:13 possibility 55:18 116:12 126:9 151:9 possible 55:1,1 55:8,10 74:22 75:12,19,22 79:14 89:23 133:6 possibly 20:5 post 87:1 potential 52:19 81:5 115:20 potentially 41:10,12,19 45:14 50:21,24 55:20 58:13 69:6 76:12 88:4,21 106:6 110:19,25 127:5,22 128:23 150:23	power 112:16 113:9 114:3,11 114:22 116:10 150:4 151:7,22 practicality 57:12 practically 57:20 115:1 150:12 practice 28:16 precise 20:23 21:2 132:25 preclude 52:12 52:19 precluding 55:2 predefined 52:15 74:3,8 74:12,14 75:9 75:17,21 76:1 76:3,6,11,16,20 76:20 77:6,6,8 77:13,17,17,21 78:8,15,22 80:3,11,23 85:24 86:14 87:5,21 89:15 89:20 91:17 92:5,10 93:4,6 93:8,9,16,17,21 93:22 94:2,3,9 94:13,15 104:3 104:9 121:12 124:14,18	predefinition 76:24 predetermined 76:15 77:13 147:12 preempt 80:2 preempted 86:17 premarked 6:22 preparation 7:24 123:25 prepare 7:25 prepared 39:19 40:20,24 41:1 54:10,13,16 77:15 146:5,8 146:12,17 preparing 8:2,9 123:23 present 2:22 107:21 116:7 151:5 presently 71:11 presents 34:16 preserve 107:22 presumably 40:1 pretty 25:7 141:11 prevent 46:10 previous 137:11 156:5	previously 13:15 42:18 primarily 137:25 150:25 primary 116:7 151:4 principal 58:8 59:11 principal's 57:6 58:13 60:12,22 61:12 printed 7:5 13:4 prior 7:3 22:5,6 22:10,16,16,21 23:6,15,21 24:6,21,24,24 25:4,9 26:5,12 27:3,3,6,11,12 37:9 113:8,23 113:23 116:6 150:10 151:4 priorities 73:24 77:20 78:14 90:20 91:25 92:5,11 104:5 121:9 153:9 prioritization 75:19 76:2 prioritized 86:4 148:22 prioritizing 104:2 priority 77:25 78:18,23 79:9
---	---	---	---

[priority - question]

80:10,20 83:11 83:25 84:3,4,5 84:8,14 85:4 86:21 87:6 90:19 91:25 101:23 102:9 102:14 103:11 103:19 104:15 105:17 107:15 107:17 109:14 109:18 110:4 111:4,5 117:1 121:16,21 122:3 123:3,10 123:14,18 124:5,23 130:19,21 132:1 133:25 134:21 135:22 135:24 136:8,9 136:18,19 137:7 138:11 138:12,13,14 142:21 143:18 143:21 146:25 147:2,9,12 148:7,7,16,20 148:23 149:4,5 149:16,17 151:13 152:1,3 152:7,9,11 probably 10:6 69:8 77:1 107:9	problem 13:21 14:12,22 15:21 41:8,9,17 46:7 49:10 56:12 115:8,15,18,23 116:6,17 125:2 125:9 128:15 130:21 136:10 150:10 151:4 problems 14:13 34:16 36:3 40:10,13 41:3 procedure 3:2 proceeding 7:20 10:13 11:2 13:15 28:6 30:13 42:19 112:6 proceedings 28:21 29:20,21 43:19 process 9:14 30:21 63:14 64:20 113:12 148:24 processes 20:16 20:23 63:18 64:17,18 professional 3:7 156:2,21 progression 41:24 project 11:20 promise 133:21	prompt 6:14 25:25 pronounce 138:11 proper 28:17 proposed 125:9 proposes 116:16 proposition 109:24 110:15 110:16 126:3 protocol 86:14 87:5,6 91:17 92:5,10 93:9 93:17,22 94:2 94:3,9,13,13,15 94:24 protocols 52:15 63:7,9 93:13 94:19 95:1,9 provide 12:21 52:14 115:1 116:8 150:13 151:5 provided 112:21 116:13 118:7,20 123:4 151:11 provides 59:15 64:2 79:13,13 81:3 145:11,21 providing 141:8 ptab 29:2,8,12 30:9	pub 4:15 public 3:7 56:18 98:5 155:20 156:3 156:22 159:19 publication 4:15 42:24 publications 22:17,22 purports 41:9 41:17 purpose 41:24 63:25 76:4 106:7 111:9,9 111:14,23 pursuant 3:1 put 97:7 106:4 112:7 126:12
q			
quantify 12:14 quantity 143:16 question 6:7,8 6:8,18 10:24 14:17 15:8 18:14 21:8 24:17,19 26:9 38:19 40:5,22 41:2 44:19 45:18,24 48:16 48:18 49:12 50:13 51:15 52:22 56:11 57:13 58:4 59:3,21,24			

[question - recites]

60:2 70:5 72:9 72:12,12 76:6 77:1,15 78:3,5 79:6 82:19 87:22 91:22 92:19 94:25 95:5 99:13,18 106:20 111:2 117:24 120:7 125:4 126:1 133:10 141:10 145:3 146:10 148:13 152:5 152:19 questioning 72:16,24 73:2 questions 5:10 49:11 72:10 153:16 154:1 queue 104:15 105:16,23,24 106:16,16,21 106:23,23 133:25 134:21 135:12,24 136:10,15 138:12,13 queues 106:4 quick 24:15 quickly 75:7 quite 37:1 50:14 quotation 66:6 quote 34:14 74:22 77:21	80:16 81:1 93:17 96:24 132:2,8 134:18 134:19,19 r r 5:1 158:3,3 radio 14:2,4 16:10 42:5,7 75:10,10,11 87:10 88:16,18 88:22,23,25 89:6,16,17,18 89:21,21,23 90:3,7 98:6 145:12,21 ramifications 23:10 24:2 94:21 rationale 54:5 read 15:17 16:13 24:10 27:16 35:6 48:1,8,20 49:6 57:14 79:2,5 79:12 91:3 124:2 134:13 134:16 154:2 155:2 157:9 159:5 reading 15:22 49:10 65:1,4 92:19,24 110:14 136:12 139:3,4	ready 67:20,21 152:16 real 108:8,10 108:14,23 109:3,8,11 142:1 reality 46:23 128:8 really 5:14 7:6 9:13 21:9 46:10 125:6 133:19 134:11 137:9 reason 6:11 106:16 112:3 133:14 157:11 158:6,9,12,15 158:18,21 reasonable 100:16 110:6,9 110:16 111:16 126:8 127:2 128:6 reasonableness 126:16 reasonably 111:15 126:8 reasons 10:8 23:18 138:15 138:16 recall 9:3 10:7 12:3 29:22,24 30:6 35:3,13 93:12,14 94:5 124:4 142:15	receipt 14:2 42:5 95:16 96:14,16 98:17 98:20 99:20 130:4 157:17 receive 7:19 120:1 131:7 received 16:23 73:24 74:1 75:12 81:15 82:10,17,22 85:25 89:23 104:6,7 121:9 121:11 124:19 131:20 136:22 137:6 145:12 145:22 149:6 receiver 145:1 receiving 15:11 16:6,10 41:16 47:12,18,25 48:10,15,25 50:17 58:25 59:6 60:4 68:22,23 69:23 70:2 119:7,24 132:12 recess 13:8 32:12,20 73:8 101:10 129:20 153:22 recipient 130:23 recites 103:8 104:2,14,20
---	---	--	---

[recites - required]

130:3 134:18 135:2 146:23 recognize 88:13 127:9 record 13:5,7 13:10 32:8,10 32:11,14,19,22 43:6 48:9 73:6 73:7,10 81:3 81:11 85:15 99:8 101:9,12 112:3 129:19 129:22 146:11 153:21,24 154:4,7,12 recorded 80:5 80:8 109:20 110:6,22 111:17 143:22 recorder 111:8 111:24 recording 81:15,23 110:7 110:22 111:12 143:23 records 82:16 82:21 red 121:3 redirect 72:11 153:16 reduce 129:6 reduced 156:10 refer 43:2 114:4 150:24 151:17	reference 19:21 29:10,13 39:11 42:20 140:13 referenced 157:6 references 22:10,16 25:24 99:10 referencing 99:14 125:5 referred 44:8 referring 8:25 13:19 42:10,13 43:17 55:23 115:16 130:14 refers 55:18 84:24,25 refresh 31:7 regard 58:13 regarding 34:24 68:21 regardless 111:13 regards 99:6 registered 3:7 156:2,21 relates 112:14 relation 156:7 relative 37:18 50:1 55:4 60:18 released 45:7 relevance 28:3 28:14,16,19 29:5,16,23	30:11 33:5 35:1,9 36:11 37:12 38:7 42:11 relevant 7:20 10:13 67:16 132:7 relook 140:11 reluctant 22:11 24:4 61:19 rely 16:8 remember 9:1 9:13 19:22 20:1,8 37:14 37:15,16 38:13 38:14 39:1 40:3 43:8,11 93:6 106:4 139:6 reminded 100:18 reminder 25:25 remote 1:16 2:1 3:2 7:6,11 remotely 1:17 3:4,6 156:9 render 22:23 52:9,25 110:3 140:15 rendered 137:19 rendering 19:16,24 54:17 renders 47:12 50:6,23 53:25	69:19 70:7 83:23 96:13 98:23 110:1 131:15 137:13 139:19 140:5 142:16,17 rep 57:24 repeat 14:17 25:2 59:3 82:19 125:4 148:13 152:5 rephrasing 88:3 reply 14:4 15:11 42:6 reporter 3:8 5:12 13:7,9 32:11,13,19,21 59:2 73:7,9 82:25 101:9,11 104:4 124:15 129:19,21 136:1 153:21 153:23 154:6 156:1,3,21 reporting 99:25 reports 12:15 represent 29:13 representation 66:9 require 109:3,5 required 115:1 150:12 159:13
---	--	--	--

[requirement - ruling]

requirement 75:11 85:25 87:11,16 88:1 89:17,22 90:3 90:7 124:19 127:17 128:7	retract 71:4 return 157:13 157:16 reveal 9:19 30:16 review 4:8,13 31:14 33:2 157:7 reviewed 27:12 123:22,25 reviewing 27:11 94:7 rewind 99:8 right 5:25 7:21 8:18 9:7,15 10:4 11:2 12:1 12:22 13:16 14:14,23 15:15 16:11 18:1,4 20:9,22 21:5,7 21:12 23:7 26:14 32:18,23 33:3,22 34:23 34:25 37:23 38:4 41:13 42:12,17,23 43:7 46:19 47:23,24 48:7 48:7,25 50:4 52:2 53:1,18 56:7,24 58:5,6 58:21 59:7,11 60:5,13 62:4,6 62:8,13,23,25 63:14,15,20,21	64:10 65:8,18 66:13,16,18 69:4,16 70:18 71:10,14,20 74:15,17 75:2 75:3 76:17 78:6,10 81:9 81:17,21,25 82:5,23 83:16 83:25 84:10,11 84:14 85:3 86:5,22 87:22 89:1 91:1,7,14 91:19 92:2,3,6 92:23 93:6 95:2,21,25 96:8,17 97:1,5 97:15 98:7,11 98:24 99:16 101:1,19 102:2 103:3,9,11,20 104:12 105:5 105:17 106:5 106:10,17,24 107:18,19 108:5 109:15 109:16,22 111:7 114:8,19 115:15,19,23 116:2,3,14,15 116:19 117:2,6 117:13,14,16 118:4,8,12,21 119:13 120:1,4 120:5 121:18	121:19 122:2,5 122:18,22,24 123:5,6,9,11,23 124:6,24 125:3 125:15,16,19 125:20 126:5 126:20,23 128:18,19 129:14,17 131:2,11,12,25 133:15 134:2,3 134:9 135:6,8 135:11,13,18 136:11,13,14 136:23,24 137:20 138:21 138:24 139:11 139:14 142:7 142:11 143:13 143:14,16,20 143:24,25 144:3 146:21 147:12,15,19 147:23 148:1,8 148:9,11,16,25 149:10,21,24 150:18 152:15 153:12 road 2:8 rockefeller 2:4 room 150:20 round 116:20 rules 3:2 6:5 ruling 30:19
--	---	---	--

[s - see]

s	50:16 51:10,10	61:5,10,10	120:6,7,8,10,13
s 5:1 83:1 158:3	51:12 56:13	schools 62:18	120:16,20
s3 147:10	61:9 62:15	scope 28:4,11	121:10,11,12
safe 114:20	63:6,17 65:17	28:13,19 29:6	130:5 142:6
safety 57:6	68:22 74:6,8	29:17 30:11	147:1,11,18
98:5	77:20 78:14	33:6 35:2,10	149:6
sake 31:1	80:9 81:11,18	36:12 37:12	seconds 128:2
satisfies 91:18	82:15,20 85:23	38:7 44:22	section 15:20
92:6	86:13 87:2	76:11 85:7	15:22 22:3,10
saw 9:24 22:3	88:10 89:15	95:11	23:12,25 24:10
34:20 117:19	90:11 91:6,11	scratch 42:16	24:11 25:16,25
saying 17:5	94:22 97:22	42:16	26:2 33:20
25:19 28:7	98:8 101:22	screen 5:10	53:16,21 54:21
54:22,24 55:2	102:8,12	7:12	56:6 78:4 83:7
55:8 64:9	105:14,18,23	se 114:12	91:10 144:17
68:11 69:19	107:13,21,24	search 12:14	sections 27:13
70:7 74:22	108:19 109:18	27:14	securely 14:6
80:16 83:22	110:1 111:19	second 13:5	see 7:6 13:4
84:16 87:9,14	112:14 113:4	50:4 51:22,24	14:10,25 15:7
87:24 92:4,18	114:25 115:23	52:1,7,9,24	16:2,25 19:12
94:23 99:5	116:6 119:6	53:4,8,10,17,22	20:19 21:20
103:17 111:3,4	121:21,25	54:2,11,11,14	22:18 30:9
120:23 125:11	123:13 132:1	54:18,21,23,25	31:8,21,22
134:6,24 135:1	134:16,20	55:7,9 68:22	33:7 34:2,11
135:15 137:13	144:13 145:10	68:23,24,25	34:19,22 36:21
139:5 140:1	149:3,24	69:3,3,10,16,18	38:8,25 39:24
141:7,13,23	150:12 151:3	70:2,6,17,24	42:8,25 44:10
142:13 143:10	scattered 8:6	73:13 74:1,1,2	47:20 53:14,24
143:19 144:2	scenarios 86:14	79:21 83:11	56:1,20 61:7
says 14:2 16:21	scene 34:9,15	90:20 91:13	63:4,10 64:7
20:15,21,23	school 56:17	92:1 95:17	73:1 74:4,10
22:15 30:9	57:4,4,5,11,15	96:15,17 98:21	75:14 76:10
31:24 33:23	57:15,21 58:7	104:3,7,7,8,14	77:22 80:1,17
34:5 42:5	59:10,16,17	107:16 119:24	81:6 82:13
43:23 46:13	60:11,18,22,25	119:25 120:1,4	83:7,8,13

[see - sit]

84:24 85:1 86:1,19 87:7 89:25 90:22 91:6 95:18 97:8 98:1 100:25 101:7 101:19,20,24 102:6,8,15 104:10,16,23 106:2,22 108:2 109:21 112:22 113:21 115:12 119:6,9 121:13 121:23 122:14 123:17 124:20 126:7 130:6 131:24 132:9 137:11 144:14 147:4 149:7 seeing 31:20 82:3 seeks 13:21 14:13,22 40:10 41:3 115:18 seem 52:22 100:16,19,19 seems 17:18 26:18 28:18 62:17 134:15 140:3 150:24 selected 75:18 75:22 semicolon 105:14 134:20	sending 132:15 132:15 sense 26:22 81:19,24 82:2 82:6 110:6,9 110:16 sent 82:10,16 82:22 105:15 147:10 153:7 157:14 sentence 14:20 33:23 34:4 43:23 45:4 53:10 54:8 62:14 63:12,16 63:17 65:22,25 66:10,12 67:7 81:12 88:4,9 98:4 99:1,5 109:18 125:17 sentences 99:3 separate 60:20 sequence 105:25 106:1,9 106:10 107:3,4 107:4,7 sequentially 116:10 151:7 series 79:21 server 63:13 services 11:7 11:12 35:12 set 10:20 26:23 33:24 47:19 75:25 80:5	94:19 95:1 138:4 sets 121:3 setting 21:8 35:21 95:8 setup 116:18 several 7:2 8:4 8:7 34:16 36:25 share 31:25 shared 31:25 sheet 157:11 shi 2:22 shopping 56:18 short 101:1 show 78:23 79:9 151:2 showing 77:25 102:25,25 shown 121:17 121:18 136:20 shows 78:17 98:14 116:25 117:12 123:3 shuffling 56:8 sign 154:3 157:12 signal 88:11,13 88:19 89:6 117:16 118:4,6 118:12 122:1,5 122:23 132:2 136:22 137:5,7 147:11,11,15 148:1 151:19	151:23 153:6,7 signals 89:4 120:4 121:17 121:17 123:5,8 135:22 136:7 137:10 147:8,9 147:19 signature 156:20 signed 9:5 157:19 signee 30:5 similar 35:8 114:17 similarities 36:22 similarity 140:12 similarly 128:1 simplex 47:19 98:6 simply 11:1 51:13 125:11 simultaneous 81:4 simultaneously 40:19 115:6,21 125:14 128:14 147:8 single 24:19,20 35:16 54:8 111:11 124:3 sir 72:5 sit 10:4
--	---	--	--

[site - sprawling]

site 118:20 119:8,12 120:17,22 121:4,6 132:5 132:8,14 149:10,10,15 149:22,24 150:7,21 151:15 152:3 152:12 sites 149:25 150:16 151:18 152:1,10 sitting 54:9,13 54:16 61:18 95:6,10 123:20 124:4 133:9 146:5,12 situations 34:8 size 75:10 89:16,21 skill 62:16 skilled 29:14 83:2 slight 135:14 slightly 144:15 small 152:20 smaller 127:3 software 20:18 63:20 64:6 65:13,18 66:8 66:23 67:12 solution 41:11 125:2,9	solutions 1:6 4:9 31:18 32:2 38:3 157:4,23 158:1 159:1 solve 13:22 14:13,23 40:10 41:3,17 46:7,9 115:15,19 116:16 130:21 135:25 136:10 solving 40:14 116:6 150:9 151:4 somebody 46:21 sorry 6:24 7:15 13:22 16:15 17:20,21 20:12 21:7,18 22:13 27:23 31:4 34:19 36:18 45:16 46:14 47:8 53:9 56:8 56:10 58:22 59:2,20,25 60:10 64:1 66:2 67:8 68:7 70:12 71:8,24 72:1,5 73:6,16 74:13 76:15,23 76:23,23 78:19 79:7 81:11,19 82:19,24 83:5 83:21 84:19 85:18 89:19	91:5,21 92:15 93:4 96:20 97:18 100:23 101:15 102:1 102:20 103:12 104:4 105:10 107:22 112:25 113:5 117:9,19 119:17,18,23 120:19 122:13 123:1,21 124:10,15 129:13 130:8 131:13 132:23 134:4 135:10 136:1,4 143:12 148:13 149:2 149:24 150:10 152:5,7,20 sort 7:19 25:13 30:20 36:16,20 61:20 105:25 106:8 sorts 25:9 35:16,18 sound 136:3 sounds 18:21 77:8 80:16 82:7 92:13 101:8 153:20 sources 81:5 space 10:17,17 12:9 speak 46:23	speaker 126:25 speakers 125:19 126:5 126:10,11,14 126:20,23 127:4,7,10,11 127:20 128:6 128:21,24 129:2,3,6 speaking 28:6,9 28:19 60:16 141:5 specific 26:19 40:22 49:12 62:9 63:7,24 80:11 specifically 16:4 24:2 29:25 40:24 43:15 61:4 64:19 67:16 69:2 79:22 84:13 99:10 100:15 102:18 122:12 specificity 71:5 specifics 53:4 specified 99:9 150:7 spend 8:2 spent 8:21 9:8 spot 7:8 102:6 sprawling 150:20
--	---	--	---

[sta - sticking]

sta 1:9 32:2 157:4 158:1 159:1 stamp 95:21,23 96:1 98:21 99:9,11,14,23 100:3,8 132:6 standards 63:9 standpoint 99:24 start 21:25 49:13 76:25 81:15 85:15 89:19 113:5,6 136:4 started 40:12 45:8 95:25 96:5 starting 13:23 14:1 16:13,20 85:20 116:21 131:23 starts 13:24 20:15 33:20 63:3 69:21 90:16 117:9,10 state 3:8 23:16 26:5,12 35:18 47:11 71:11 92:8 98:18 99:22 117:15 131:5 136:7 139:21 143:7 147:6 155:3 156:3,22	stated 25:12,12 25:15 41:24 statement 18:7 18:10,14,20 20:25 25:2 153:14 155:4 states 1:1 4:11 4:15,17 18:4 34:13 42:23 46:11 47:23 53:11 72:2 75:9 95:14 121:8 124:13 stating 25:13 83:18 stations 114:4 status 31:1,2 74:9,15,20 76:22 78:1,10 78:19 79:4 80:10,10 84:4 86:22 104:21 134:1,8,22,25 135:17 137:2 138:13 143:13 stavinoha 2:3 8:10 9:17,25 14:15 15:5,25 17:12 18:2,11 18:25 19:9 20:3 22:8 23:1 23:23 24:8 25:1,20 26:8 26:15 27:7 28:3,5,10,15,22	29:5,16,23 30:10,15 31:17 32:7 33:4 35:1 35:9 36:11 37:11 38:5,23 39:9,16,23 41:5,14 45:2 46:20 49:5,16 49:24 51:1,16 52:11 53:2,19 54:4,19 55:16 56:25 57:17 58:10 59:12 60:7,14 61:14 64:11 65:3,9 65:19 66:1,5 66:25 67:13,18 67:21 68:2 69:5,20 70:9 71:22 72:15 74:18 75:23 76:8 77:10,16 78:11,25 82:1 82:18 83:17 84:1,15 85:5 86:23 87:12,17 88:2 90:5 91:2 91:20 92:7,16 92:25 93:10 94:10 95:3 96:9,18 98:25 100:14 101:8 106:13,18,25 108:6,12,25 110:11,18	111:22 114:9 120:15 122:7 123:12 125:22 126:6 127:13 128:22 130:11 131:3,17 132:20 133:5 133:16 134:10 135:4 136:16 137:15 138:8 138:25 139:7 139:15 140:2,9 140:17,25 141:5,20 142:12 143:6 143:17 144:5 145:18 147:20 148:12 149:11 151:16 152:4 152:13,16 153:13,17,25 157:1 stay 92:21 stenotype 156:9,12 step 15:14 24:15 49:9 84:18,25 93:16 120:19 135:14 147:10 steps 84:17 110:22 stick 28:20 sticking 27:10
--	---	---	--

[stop - system]

stop 65:4 99:8 135:15 stopped 45:8 65:1 stored 101:22 102:9,12 103:10,19 105:24 106:1,8 106:10 107:4,4 107:6 109:12 117:1 135:24 136:9 148:23 153:6,12 stores 108:5 storing 104:14 105:15 107:16 109:4,5,14 111:3,5 133:25 134:20 138:11 147:1 148:10 148:11,15,20 straight 17:5 straightforward 17:19 strategy 11:6,7 11:8,12 stream 88:11 88:14,20 street 2:13,18 stretch 114:3 strike 9:20 11:23 13:22 16:15 17:21,22 21:8 22:5 23:4 27:22,24 29:1	29:20 37:4 42:16 44:12 48:4 49:13 53:9 54:11,15 55:12 59:25 60:10 67:8 70:12 71:24 73:13 74:13 76:15 78:7,19 79:7 83:22 89:18 93:4 106:19 107:23 120:9,11 123:21 130:8 130:25 134:4 141:23,25 146:20 150:10 152:8 struck 128:5 structure 31:24 structured 49:21 stuck 24:15 31:21 study 124:2 stuff 12:17,19 39:4 subject 35:7,8 36:8 82:6 subjective 26:19 82:3 submit 29:19 30:7 submitted 12:16 27:19	30:18 34:24 subscribed 155:15 159:14 subsequent 76:2 102:13 subset 19:13 substance 9:19 30:16 substantive 10:9 suddenly 110:23 suggests 29:14 suitable 112:19 130:20 135:23 136:9 suitably 115:3 150:14 suite 2:8,18 summarizing 134:11 summary 116:5 summer 9:2,4,4 superior 74:9 74:15,19,24 75:5 76:1,22 77:25 78:9,18 78:24 79:4,11 79:15 80:1,4,7 80:10,18,21 83:16,20,24 84:4,12,18 85:4 86:21 95:24 96:2,4 96:25 97:3	support 4:7,13 11:8 31:13 33:1 126:2 135:7 supports 56:14 112:1 suppose 150:2 supposed 28:8 28:11 41:21 139:23 141:12 suppress 74:25 79:16 sure 9:6 13:6 14:18 18:15 22:20 23:13 24:5,18 25:7 28:12 30:1 40:5 55:10 59:4 64:14 78:2 103:13 110:16 127:15 128:23 129:5 132:22 133:10 134:13 139:21 141:2 151:2 switch 72:17 sworn 5:3 155:5,15 156:6 159:14 system 34:6,6 47:15 48:12 52:13 55:14 56:14 64:19 68:25 75:20 76:4 82:12
---	--	--	--

[system - testimony]

92:10 94:19 95:1,9 110:24 112:15,19 116:9 143:16 143:20 144:13 144:19,24 145:1,11,13,21 145:22 146:2,9 146:16,20 151:6 153:4,10 systems 17:4,9 17:24 20:17 33:24 55:4 63:19,23 64:5 64:16 65:12,17 66:7,22 67:11 125:12	taken 3:4 109:10 156:8 talk 7:23 8:16 10:16 22:1 40:19 44:2 55:24 69:2 72:6 73:14 75:8 84:22 86:3 105:3 129:24 133:21 133:22,24 135:21 146:22 148:19 talked 6:5 40:25 58:4,24 60:1 63:17 78:8,22 84:13 86:22 91:12,23 93:3,5 99:14 116:25 117:12 125:1,11 126:18 128:10 147:17 talking 5:15 6:24 15:10 36:1,13 38:20 40:12 43:3,13 43:25 44:5 45:6,8,8 46:14 46:22 48:6 51:5,11,20 52:5,17 55:13 62:1,17 69:8 70:20 71:12,20 73:22 76:25	77:2,2 81:2,20 99:13 103:13 108:18 117:22 127:16 143:11 147:14 talks 14:1,25 45:4 48:23 50:3,10 58:19 58:20 63:12 81:12 94:1 96:25 98:3 99:2 109:17 144:24 149:22 teach 94:2 teaches 23:7,22 81:13 teaching 122:21 teachings 27:5 29:10 team 11:15 17:7,11 18:1 teams 16:22 18:6 tech 11:6 technical 40:2 technology 38:12,21 39:7 39:14,20 40:9 41:3 tell 15:23 46:3 50:14 54:10,14 54:17 79:3 95:7 141:17 146:6,13	151:12 ten 27:15 32:16 101:5,6 129:14 tend 12:7 term 16:4 19:20 23:9 24:3,16 25:7 26:18,19,23 39:17 40:15 43:9 44:22 62:8,13 63:13 66:2 77:5 82:2 93:5,16,17 95:8 113:24 118:9 123:13 138:20 139:6 139:10,13 142:4 145:24 146:1,8,16 termed 80:10 terms 19:5,12 27:1 45:12 52:20 59:18 60:17 64:23 65:24 66:22 100:16 110:7 110:20 111:9 118:8 126:15 128:5 132:21 133:8 140:10 terrible 106:20 testified 5:4 testify 156:6 testimony 6:12 65:7 71:9
t			
t 83:1 158:3,3 table 121:20 122:4,16,17 123:2 151:20 tables 121:18 take 10:7 12:24 16:14,16 21:15 22:14,14 24:15 32:15 56:5 61:23 68:3,13 71:25 72:21 73:3 88:20,21 89:10 98:5 101:1 105:23 107:8 129:14 134:19 135:14 153:16,17			

[testimony - transmission]

155:3,5 157:9 157:17 159:8 text 34:17 37:3 103:8,18 105:14 116:24 thank 154:1,8 thanks 154:5 thereof 75:13 89:24 156:12 thermal 112:16 113:9 114:3,11 114:22 116:9 151:7 thesaurus 76:19 77:12 thing 12:5 31:11,20 36:1 48:1,21 57:21 100:16 108:16 126:15 127:7 152:21 things 35:18 39:3 49:10 100:17 think 9:1,5 10:20,22 12:2 12:14 14:24 18:3 24:11 26:22 28:20 32:1 36:15 39:2,10,25 41:6 43:5 44:17,21 46:8 46:9 50:13 55:17 57:18	60:24 65:5 66:19,21 71:15 72:4,7,18 76:5 76:25 85:7 89:3 90:6 93:24 95:5 97:6 102:2 110:12 114:11 114:20,22 122:14 126:7 126:16,24 127:2 130:12 130:13 133:6 133:23 139:12 141:4 142:19 147:22 150:7 151:23 152:14 153:14 154:3 thinking 46:22 61:24 third 40:17 43:23 87:1 104:20 thompson 8:14 thought 11:18 27:13 36:25 72:21,22,23 89:19 three 97:24 126:10,23 127:24 152:20 tied 11:15 time 10:22,25 11:18 14:3 16:11 40:10	42:5 69:1 72:18 73:5 81:16 85:17 95:16,21,23 96:1,2,4,14,16 98:16,20,20 99:9,11,14,20 99:23 100:3,8 108:8,10,14,16 108:23 109:3,5 109:7,8,11 112:2 127:21 130:4 131:7,19 132:5 139:2 141:10 142:1 154:1,11 156:9 157:18 timeframe 157:8 times 6:2 50:14 timing 6:16 titled 4:9 38:3 today 5:10 6:12 36:1 39:11 40:12 43:5 54:10,13,16 95:6,10 123:20 124:4 133:9 140:7 142:10 146:5,12 today's 36:5,9 36:14,21 38:18 together 41:19 88:12 127:19 155:4	told 50:15 100:12 110:15 took 27:5,5 73:12,18 81:17 top 19:22 20:1 30:6 40:3 46:5 93:12 94:5 102:23,24 115:22 121:21 124:7 topics 72:17 total 154:11 totally 5:25 towards 9:6 town 35:17 tracking 137:11 trademark 1:1 trans 71:13 transceiver 69:23 70:1 71:13 80:12 81:14,16,17,25 86:17,18 98:7 transceivers 69:24 97:24 98:6 transcript 154:3 155:3 156:12 157:6 157:19 159:5,8 transition 74:23 transmission 44:5,8 46:15
---	---	---	--

[transmission - united]

46:18 63:9 74:25 79:14,16 79:20,21,23,24 80:2,5,14 83:19,25 84:18 85:4,9 88:10 95:24,25 96:3 96:4,5,6 100:8 100:13 109:18 109:19 110:4,5 110:7,22 111:10,11,17 transmissions 81:4 86:4,4 110:23 111:10 transmit 69:25 75:1 79:17 transmitted 44:6 46:16 transmitting 51:23 75:2 79:18 81:13 trial 1:3 28:16 29:3 true 10:1 12:2 65:15 89:2 138:22 156:11 159:8 truth 156:7 truthful 6:12 try 6:14 7:7,7 15:7 22:11 45:17 48:21 59:22 70:5	trying 11:9 12:2 18:19 23:14 27:1,2,4 29:25 35:20 40:19 43:11 45:22 46:7,9 46:10 48:18 49:21 51:13 54:6 77:4 78:15,20 93:20 98:13 115:15 125:6 131:13 134:15,23 139:25 141:6 tuned 44:1 turn 33:8 46:25 95:13 101:14 102:11 124:11 turning 23:3 68:16 74:7 75:7 two 20:16 22:15 31:24 41:19 55:11,12 55:13,14,19,20 63:18 64:17,18 64:23 84:3 88:12 99:3 118:8 147:7 148:6 152:20 type 12:17,19 33:20 39:3 61:20 63:13 75:10 80:12 87:10,25 88:17	88:23 89:6,16 89:21 90:3,7 121:16 122:1 122:23 147:9 types 41:8 45:11 61:3 87:3,13,15,19 88:7 122:4 123:7 typewritten 156:10 typically 115:20 127:16 typo 102:1 typos 10:6,9 102:3	78:20 82:15,21 87:10,15,24 88:6 91:21 93:20 98:13 100:9 128:20 131:14 134:23 139:23 140:1 141:7 144:2 understanding 22:2,6,25 23:14 24:9,22 24:23 25:18 28:1 38:11,21 39:7 40:9 41:2 43:9 46:6 57:3 66:11,16 67:6 94:25 113:25 140:5 145:23 149:25 understood 53:12 73:2 82:9 87:2,18 92:9 unit 11:6 35:16 47:19 51:4 55:13 56:16 59:16 62:4 81:2,8,8,14 82:11,17,22 97:12 120:23 136:21 137:6 153:8 united 1:1 4:11 4:15,17 42:23
		u	
		u.s. 1:14 4:8,14 under 19:14 25:10,10 31:25 38:6 88:21 116:5 121:25 155:3 underlying 16:7 understand 6:8 13:18 18:19 22:4,15,21 23:6,20 26:9 27:5 38:19 43:3,18 45:22 49:20,21 51:10 51:13 56:12 60:3 71:14,15 77:4 78:2,16	

[units - versions]

units 35:16,17 56:23 82:11 98:7 115:3 118:6,19,23 119:2 149:9 150:14 151:19 unlimited 129:2 unnecessary 110:7 unplanned 35:23 unreasonable 100:20 unusual 18:13 updates 9:23 10:3 31:1,2 upended 110:25 use 7:4,17 19:11,20 23:15 24:3 38:12,22 47:3 49:18 53:5,6,23 62:8 63:8,8,12 65:4 66:2 69:13 76:10,11 87:4 87:20 91:17 92:5 95:7 100:4 105:25 106:6,9,16 107:5 113:24 116:9 131:4 138:20,23 139:9,13	140:22 141:22 142:4,9 148:17 151:6,17 used 16:4 24:11 27:1 39:21 43:12 63:7 76:2,3 77:6 92:10 93:17 133:18 142:16 145:6,7 146:2 146:6,9,13 151:18 157:19 useful 34:7 99:8 usefulness 127:23 user 55:19 57:25 60:18,22 61:1,13 64:10 64:13 69:7 74:9,15,19,24 75:2,5 76:1,22 77:25 78:10,18 78:24 79:4,11 79:15,18 80:1 80:1,4,5,6,7,8 80:10,17,18,21 81:3,4 83:16 83:20,24 84:4 84:12 85:4 86:22 90:21,25 91:6,9,18 92:2 92:6,11,22,22 93:2 94:12,18 94:23,24 95:1	95:8 96:25,25 97:3,4,12,14,16 97:18,20,20,22 107:22,25 108:20 111:20 user's 74:23 79:14 80:2,5,7 85:4,8 86:16 86:17 95:24,25 96:2,4,5,5 108:1,20 111:20 users 16:23 20:17,22,24 21:5 33:25 41:9 55:20 58:5,8 59:10 59:14,17,23 60:12 62:5 63:19 64:2,5 64:22 66:12,14 66:18,20 67:4 67:10 74:25 79:17 95:11 132:19 133:2 uses 15:7 16:2 19:2,3 20:5 38:25 39:17,25 132:24 133:7 using 19:4 21:13 59:13 64:22 78:18 85:16 97:24 99:4 139:4,6	usually 30:12 utilities 133:17 utilize 25:22 54:20 utilized 20:8 26:23 30:3 utilizes 40:15
v			
v 1:8 157:4 158:1 159:1 vaguely 38:14 variables 113:12 varied 61:22 variety 51:4,5 69:23 150:5 various 8:11 10:6 25:23,23 25:24 40:16 80:11 99:4 105:23 113:4 113:12 114:4,5 142:15 144:25 145:14 vary 53:5 vendor 11:11 verbalize 117:21 verify 157:9 veritext 157:14 157:23 veritext.com 157:15 versions 6:22 6:25			

[versus - worried]

versus 18:14 19:3 32:2 39:4 88:13,13,14 90:10 101:25 103:3 137:19 video 88:11,14 88:20 view 98:19 116:6 126:8 128:5 142:18 142:24 143:4 150:9 151:3 viewed 150:6 viewing 57:19 131:20 virtual 5:12 visiting 35:17 voice 33:25 34:16 112:15 112:20 113:10 113:15,17 115:2,3,5,9,10 115:24,25 116:8,10,13 121:22 122:13 122:16,18,18 122:20 125:12 125:13 128:11 128:12,16,17 130:19 131:7,9 132:2 135:22 136:7,22 137:7 147:8,9,14,25 150:13 151:6,8 151:10,22	153:5,5,6,11,11	we've 19:11 67:18 72:17 web 4:9 38:3 welcome 73:11 101:13 129:23 went 33:11 39:10 125:7,8 west 2:18 willard 33:1 williams 1:16 2:7 3:3 4:7,13 5:2,7 6:1 13:11 21:7 28:24 32:24 33:1 38:9 45:16 51:9 68:14 72:8,8,8,9,20 73:12 83:3 85:17 101:14 129:24 141:9 142:7 152:23 154:1 155:1,13 157:5 158:2,24 159:2,4,12 willing 77:14 wireless 88:10 witness 5:3 9:18 11:1 12:12 30:15 68:1 156:6 157:8,10,12,18 wondering 15:23 18:22 40:8 45:19 60:16 82:6	83:22 word 20:5 21:3 23:9 27:14 36:15 38:25 39:1,17,21,25 49:18 62:9 65:1 82:2,25 124:3 131:5 133:18 138:4 140:22 141:22 142:9 145:6,8 145:15,25 146:4,6,13,15 146:18 wording 62:6 71:7 words 15:24 40:6 65:5,10 66:9 71:3 126:7 148:17 work 6:19 8:8 8:17 10:17,18 11:13,14,22,22 12:7,8 68:1 73:4 153:19 worked 9:22 10:23,25,25 11:19,25 working 8:22 9:3 113:17 works 5:19 68:4,14 85:17 110:24 worried 102:7 114:15
	w		
	wait 56:9 68:11 72:12 77:1 152:20 want 5:15 6:4 7:5,11 9:23 16:2 22:20 24:14 30:25 32:1,7 36:24 45:13 49:6 60:2 66:3 68:8 76:19 77:1,11 79:2,3 100:10 126:13,15 128:1 138:24 152:19,25 wanted 52:16 58:12 72:16 wanting 48:17 100:18 wants 36:19 72:20 washington 2:13 water 132:3,8 way 30:2,4 57:18 64:24 65:8 75:19 76:12,14,16 91:3 95:7 134:19 156:14 ways 80:11 84:3		

[wraps - zoom]

wraps 154:3	york 2:4,4
written 3:1	yuan 2:22
wrote 9:14	z
x	zero 38:15
x 4:1	zoom 5:22 7:16
y	
yeah 9:5 10:1 13:13 15:16,19 16:13 21:22,22 21:23 28:15 31:5,20 32:4,9 32:17 42:3 46:23 47:7 48:8 56:8 65:20 67:23 68:8,10,20 98:12 100:25 101:3 102:3 103:4 116:18 116:18 118:10 122:19 124:17 125:10,10,10 126:1,21 129:4 129:5 141:2 147:24 150:17	
year 32:6	
years 5:24 12:4 30:24 35:4 36:25 37:14	
yep 21:11 23:19 101:17 113:22 115:13 129:16,18	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.