

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

3
4 MOTOROLA SOLUTIONS,)
INC.,)
5)
Petitioner,) Case No. IPR2023-01294
6) U.S. Patent No.
v.) 8,831,664
7)
STA GROUP LLC,)
8)
Patent Owner.)

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16 REALTIME DEPOSITION OF DAVID HILLIARD
17 WILLIAMS, a Witness, taken on behalf of the
18 Patent Owner before Peggy E. Corbett, CSR, CCR,
19 RDR, pursuant to Notice on the 12th day of June,
20 2024, at the offices of office of the witness at
21 E911-LBS Consulting in St. Louis, Missouri.

22
23
24 STA Group Exhibit 2006
Motorola Solutions Inc. v. STA Group LLC
IPR2023-01294

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A P P E A R A N C E S

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E X H I B I T S

NO.	DESCRIPTION	PAGE
EXHIBIT 1001	U.S. Patent Number 8,831,664, Shaffer	8
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Reporter's Note: The original exhibits were submitted to the court reporter for copying and distribution with retention by Mr. Kantarek thereafter.

1 (Deposition commenced at 9:00 a.m.)

2 DAVID HILLIARD WILLIAMS,
3 a Witness, being first duly sworn, testified
4 under oath as follows:

5 EXAMINATION

6 BY MR. KANTAREK:

7 Q. Good morning, Mr. Williams.

8 A. Good morning.

9 Q. I know we just did this not too long
10 ago, but I still want to go over a few rules
11 maybe not rules, maybe guidelines for the
12 deposition, if that's okay with you.

13 A. Absolutely.

14 Q. You have been deposed before a lot of
15 times, right?

16 A. Yes.

17 Q. All right, and since this is a video
18 Zoom -- or well, a Zoom deposition, I think we
19 both know that talking over each other, it can
20 get garbled and then the court reporter can't
21 hear what we're saying and write it down, so I'll
22 do my best to wait until you finish your answers,
23 and if you could do your best to wait until I
24 finish my questions. Does that sound fair?

25 A. Yes.

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1 Q. And for that, and I'll also assume
2 that -- I'm sorry, strike that. I'll also assume
3 that if you don't follow up and ask whether --
4 ask me to repeat a question or ask for more
5 information I'll assume you understood the
6 question; is that fair?

7 A. Yes.

8 Q. So is there any reason you can't give
9 truthful testimony today?

10 A. No.

11 Q. No medication or anything?

12 A. Correct.

13 Q. So breaks, you can ask for one whenever
14 you need it. We'll try to take one about every
15 hour, but no breaks while a question is pending.
16 Does that sound fair?

17 A. Yes.

18 Q. So for exhibits I'm planning on doing
19 the same thing. We have premarked exhibits from
20 the Petition that you cite in your Declaration.
21 For example, Exhibit 1001 is the '664 patent.
22 Does that naming convention work for you?

23 A. Yes, it does.

24 Q. And also, I'm going to be using when I
25 say page numbers it's going to be from the footer

1 of the documents, as opposed to the numbers in
2 the documents themselves because I know sometimes
3 that was a little bit of a source of confusion,
4 but you can always feel free to confirm, but I'll
5 try to stick to using page numbers and footers if
6 that makes sense to you, as well?

7 A. Okay.

8 Q. Also since it's a remote deposition I
9 just have to ask, do you have anything up on the
10 screen besides the Zoom app?

11 A. Let me get rid of these; no, I'm good.

12 Q. I'm sorry, and Exhibit Share, too,
13 obviously.

14 A. Yes.

15 Q. All right, I'd like to talk to you a bit
16 about just your preparation for this deposition.
17 When did you prepare for this deposition?

18 A. Some yesterday, some the last couple of
19 weeks.

20 Q. How much time would you say you spent
21 preparing for this deposition?

22 A. Several hours.

23 Q. More than ten?

24 A. Probably right around there, or less.

25 Q. And for your Declaration, you submitted

1 a Declaration in this case, right?

2 A. Yes.

3 (Exhibit 1002 was marked by the
4 reporter for identification.)

5 Q. (BY MR. KANTAREK) That's Exhibit 1002?

6 A. Yes, and by the way, I have clean paper
7 copies of the Declaration, and at least some of
8 the other exhibits.

9 Q. Okay, great. Yeah, I have uploaded all
10 of the exhibits onto Exhibit Share or some
11 exhibits. You can feel free to refer to the
12 paper copies or electronic copies, whatever you
13 prefer.

14 But oh, yeah, so sorry I just wanted to
15 ask briefly about the time you spent on the
16 Declaration in this case. So how much time would
17 you think you spent on that Declaration?

18 A. I do not know. When was this done?
19 August of last year? I'm trying to find the
20 signing date.

21 Q. Yeah, if you go to Page 179 of Exhibit
22 1002 it says, "Executed in St. Louis, Missouri on
23 August 21st, 2023."

24 A. Right. So it's been awhile. I mean I
25 spent a lot of time, you know, well into double

1 digits, but I couldn't quantify I don't think.

2 Q. Would you say more than 50 hours?

3 A. Possibly.

4 Q. And when you did this -- when you spent
5 this time on your Declaration, you were able to
6 make any edits to it and write whatever you
7 wanted in it, right?

8 A. Correct.

9 Q. The opinions in here are your opinions,
10 right?

11 A. Correct.

12 Q. And are there any opinions you want to
13 add or take out as we sit here today?

14 A. No opinions. There's typos, of course,
15 but no opinions.

16 Q. Substantively there's nothing, you don't
17 have any additional opinions on this subject
18 matter that weren't in your Declaration, right?

19 A. Correct.

20 (Exhibit 1001 was marked by the
21 reporter for identification.)

22 Q. (BY MR. KANTAREK) All right. I'd like
23 to take you to Exhibit 1001 which is U.S. Patent
24 Number 8,831,664 which is Shaffer. Do you have
25 that in front of you?

1 A. Yes. I'm going to call this the '664
2 patent for 1001. Does that work for you?

3 A. Yes.

4 Q. So taking you to Column 1 of the '664
5 patent, that's Page, if you look at Column 1,
6 Line 18 it says: "This invention relates in
7 general to the field of communications and, more
8 particularly, to a system and a method for
9 providing channel configurations in a
10 communications environment." Do you see that?

11 A. Yes.

12 Q. And then if you go down to Line 33 of
13 Column 1 it says: "Typically, a management
14 center supports a plurality of channels, where
15 less important channels are rendered to one ear,
16 and channels that are more important are rendered
17 to the other ear. Universally, channels are
18 statically configured, where the volume of each
19 channel can be manually adjusted by an end user."
20 Do you see that?

21 A. Yes.

22 Q. And that's the background of the
23 invention section, right?

24 A. That's where that is, yes.

25 Q. So that talks about how things were done

1 before the inventions claimed in the '664 patent?

2 MR. STAVINOHHA: Objection, form.

3 A. They are highlighting what they think
4 are relevant aspects, I guess, of the background.

5 Q. (BY MR. KANTAREK) Do you not think
6 these are relevant aspects of the background?

7 A. Well, I don't know about the word
8 "universally." That's an absolute term. I'm
9 sorry, it's hard to get less grandiose -- or more
10 grandiose than universally, but in general, I
11 think that's fair, but I wouldn't use that word.

12 Q. So you think generally channels are
13 statically configured -- or I'm sorry, strike
14 that.

15 So you think prior to the inventions
16 claimed in the '664 patent generally channels
17 were statically configured where the volume of
18 each channel could be manually adjusted by an end
19 user?

20 MR. STAVINOHHA: Objection, form.

21 A. I didn't do a study of it, so I'm not
22 even sure I can say generally. I think certainly
23 some of them, some of the systems were statically
24 configured, but I couldn't offer an analyzed
25 opinion as to how many, and thus what the right

1 adjective would be.

2 MR. STAVINOHA: Counsel, can we go
3 off the record for just a minute. I'm having
4 issues with the realtime transcript.

5 MR. KANTAREK: Sure, of course.

6 (Brief recess taken.)

7 Q. (BY MR. KANTAREK) Sorry, so before the
8 break you'd testified that it's fair that some
9 channels were statically configured, where the
10 volume of each channel can be manually adjusted
11 by an end user prior to the inventions of the
12 '664 patent; is that right?

13 A. I think it's pretty likely. It's likely
14 that there were some, at least some channels that
15 were statically configured.

16 Q. And do you have any issues -- so strike
17 that. And you agree that static configuration
18 describes the situation where a volume of a
19 channel can be manually adjusted by an end user,
20 right?

21 MR. STAVINOHA: Objection, form.

22 A. Well, the full statement in here,
23 channels are statically configured where the
24 volume of each channel can be manually adjusted
25 by an end user, I think it's likely that that was

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1 true to some degree anyway.

2 Q. (BY MR. KANTAREK) Right, I'm trying to
3 understand if you think, so taking the word
4 generally "universally" aside, I'm just wondering
5 if we can agree that when the '664 patent
6 describes a channel as statically configured,
7 that means that the volume of a channel can be
8 manually adjusted by an end user?

9 A. Oh, okay, yeah, okay, we agree on that.

10 Q. And do you agree with that definition of
11 a statically configured channel?

12 MR. STAVINOHA: Object to form.

13 A. That's -- I mean the channels has so
14 many different contexts, you know, in all sorts
15 of -- with all sorts of embodiments. I wouldn't
16 feel comfortable saying that in a very general
17 sense.

18 I'm fine with saying that for this
19 matter, at least some channels being statically
20 configured in reference to the volume of each
21 channel, can be manually adjusted by an end user.

22 Q. Okay. So you would understand by a
23 statically configured channel I would mean at
24 least the channel was manually adjusted by an end
25 user; is that fair?

1 A. Yeah, for the purposes of this
2 deposition I'm fine with utilizing that
3 articulation.

4 Q. And to be clear you said that you
5 weren't sure whether it was universally true or
6 generally true, right?

7 A. I do not think it was universally true
8 as evidenced by that we've got a variety of prior
9 art that is being advanced here that says that
10 that's not necessarily true, and whether the word
11 generally, like I said, I couldn't -- I didn't do
12 a study to see what the prevalence of static
13 versus non-static communications channels
14 relative to the speaker or headphone volume at
15 the time of 2008, I didn't do that particular
16 analysis so I can't -- and thus I can't say
17 whether generally or most or some or a few or
18 what have you is the right word.

19 Q. Got it. So your pushback against this
20 phrasing in the patent is based on the prior art
21 that you have collected and presented in your
22 Declaration, right?

23 MR. STAVINOKA: Objection, form.

24 A. That's -- I mean that's certainly part
25 of it.

1 Q. (BY MR. KANTAREK) Well, you didn't do
2 any studies, right?

3 A. That's correct.

4 Q. And you even said that you didn't really
5 have an opinion as to how many channels were
6 statically configured prior to the invention of
7 the '664 patent, right?

8 A. Yes, I didn't, I did not do a study.

9 Q. Okay. I'd like to take you to your
10 Declaration which is Exhibit 1002 if you'd go to
11 Page 30, and again that's the footer.
12 Specifically Paragraph 35 if you could let me
13 know when you're there.

14 A. Okay.

15 Q. The second sentence says: "I also
16 understand that when considering the obviousness
17 of a patent claim, one may consider whether a
18 teaching, suggestion, or motivation to
19 combine the references exists so as to avoid
20 impermissibly applying hindsight when considering
21 the prior art. I understand this test should not
22 be rigidly applied, but that the test can be
23 important to avoiding such hindsight." Do you
24 see that?

25 A. Yes.

1 Q. How did you avoid impermissibly applying
2 hindsight in this case?

3 A. I mean this was almost a year ago, so I
4 couldn't respond specifically on that.

5 Q. You don't know how you avoided
6 impermissibly applying hindsight in this case?

7 MR. STAVINOHHA: Objection to form.

8 A. I don't think I used hindsight. The
9 process by which I did that, I do not remember
10 specifically.

11 Q. (BY MR. KANTAREK) So all you know is
12 you didn't use hindsight. You don't know how
13 that's true?

14 MR. STAVINOHHA: Objection, form.

15 A. I don't remember the process, as it was
16 almost a year ago.

17 Q. (BY MR. KANTAREK) And sorry, so you do
18 a lot of IPR work, right?

19 A. Yes.

20 Q. In the years since you submitted this
21 Declaration have you submitted a Declaration on
22 obviousness?

23 A. I'm sure I have.

24 MR. STAVINOHHA: Object, relevance.

25 Q. (BY MR. KANTAREK) And during that time

1 you don't know how you avoided impermissibly
2 applying hindsight either?

3 MR. STAVINOHHA: Objection,
4 relevance.

5 A. I'd have to go back to those other
6 patents to see, you know, refresh my memory on
7 the individual process that I went through, to
8 the extent that I remembered it.

9 Q. (BY MR. KANTAREK) So your attempts to
10 avoid impermissibly applying hindsight happened
11 on a case-by-case basis?

12 MR. STAVINOHHA: Objection,
13 relevance.

14 A. Well, I certainly understand that you're
15 not supposed to use hindsight in doing this and
16 the specifics and the context and the art and all
17 of that kind of stuff, and the history, and my
18 experience and everything else's are different
19 from case to case.

20 Q. (BY MR. KANTAREK) So I understand that
21 you say the words, "I am not supposed to use
22 hindsight." I am trying to ask how you avoid
23 using hindsight, and how you avoided using
24 hindsight in this case, so --

25 MR. STAVINOHHA: Objection, form.

1 Q. (BY MR. KANTAREK) So --

2 A. Same answer.

3 Q. Hold on, let me finish, let me finish
4 the question.

5 A. Sure.

6 Q. So I understand you say the words, "I'm
7 not supposed to use hindsight." I'm asking you
8 how you go about avoiding using hindsight.

9 So in this case what steps did you take
10 to avoid impermissibly applying hindsight when
11 considering the prior art?

12 MR. STAVINOH: Objection, form.

13 A. Same answer. This was a year ago. I
14 don't remember the specific steps.

15 Q. (BY MR. KANTAREK) Sitting here right
16 now, do you know how you would -- what steps you
17 would take to avoid using hindsight in this case?

18 A. I'd have to think on that, probably at
19 great length, to be able to answer that. I can't
20 answer it right off the top of my head.

21 Q. So avoiding hindsight isn't -- strike
22 that. All right, I'd like to move to a slightly
23 different topic.

24 Do you remember at the deposition last
25 month we talked about a prior -- I'm sorry,

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1 strike that.

2 Do you remember in our deposition last
3 month we talked about whether you would remember
4 if the PTAB has ever found your opinions
5 improperly pick-and-choose teachings from a
6 reference; do you remember that?

7 MR. STAVINOHHA: Objection,
8 relevance.

9 A. On that, I mean I remember a general
10 conversation about whether any of my stuff has
11 been rejected, but not specifically the
12 underlying reasons. I can't remember any
13 projection, period.

14 Q. (BY MR. KANTAREK) Oh, so to this day
15 you don't remember any or have any information on
16 when the PTAB has found your opinions improperly
17 pick-and-choose teachings from a reference?

18 MR. STAVINOHHA: Objection,
19 relevance.

20 A. I have no knowledge of that.

21 Q. (BY MR. KANTAREK) So after I brought it
22 up at your last deposition, you didn't do any
23 investigation into whether that was true or not?

24 A. No.

25 MR. STAVINOHHA: Objection,

1 relevance.

2 Q. (BY MR. KANTAREK) So you don't think
3 it's important if the PTAB has ever found your
4 opinions improperly pick-and-choose teachings
5 from a reference?

6 MR. STAVINOHHA: Objection,
7 relevance, outside the scope.

8 A. I have no knowledge of that, and
9 moreover, I don't have any reason to expect that
10 to have happened, so no, I didn't bother going
11 back.

12 Q. (BY MR. KANTAREK) Have you ever gone
13 back and looked at whether -- how the PTAB
14 treated your opinions?

15 MR. STAVINOHHA: Objection,
16 relevance, outside the scope.

17 A. I've -- like for example, if the -- in
18 the original -- in a case that goes to
19 instituting a decision to move forward, I have
20 gone back and reviewed the institutional
21 decisions and if they cited me in some portion of
22 that, I made it a point, I usually make it a
23 point to at least see what they were referring
24 to, so in a way, that is what you describe.

25 Q. But if they deny institutions, you don't

1 look at the institution decision?

2 MR. STAVINOHHA: Objection,
3 relevance, outside the scope.

4 A. Well, occasionally. I mean often -- I
5 shouldn't even say often -- the ones that I
6 remember that were denied were along the lines of
7 legal or procedural reasons, than an argument on
8 my part, deficiency.

9 Q. (BY MR. KANTAREK) Sorry, so you look
10 at -- so you remember the ones that were denied
11 on legal or procedural reasons, not the ones
12 denied based on your testimony?

13 MR. STAVINOHHA: Objection, form,
14 relevance, outside of the scope.

15 A. I don't remember -- no, not
16 specifically. I think the way I interpreted your
17 question was do I ever go back and I -- my answer
18 was I occasionally go back, but not always.

19 Q. (BY MR. KANTAREK) And you don't go
20 back, even if you are asked at a deposition
21 whether this had ever happened before and were
22 shown the specific Declaration in an IPR where it
23 happened, right?

24 MR. STAVINOHHA: Objection to
25 relevance, outside the scope.

1 A. I have never been shown where in a
2 Declaration that's happened. I am not aware of
3 it ever happening, so if you've got information
4 to the contrary, that's news to me.

5 (Exhibit 1004 was marked by the
6 reporter for identification.)

7 Q. (BY MR. KANTAREK) All right. Let's
8 move to Downs. This is. If you could keep your
9 Declaration which is Exhibit 1002, keep that up
10 or available because we're going to be referring
11 to that, but if you could open up Downs, which is
12 1004 and let me know when you have that. This is
13 U.S. Patent Number 5,754,960, right?

14 A. Say that again.

15 Q. I said this is Patent Number 5,754,960,
16 correct?

17 A. Yes.

18 Q. And this is Exhibit 1004 in this
19 proceeding?

20 A. Correct.

21 Q. You'll understand that I'm referring to
22 this, when I use the word Downs, right?

23 A. Correct.

24 Q. Taking you to -- actually strike that.
25 Downs discloses a dispatcher console, right?

1 A. The title is Display Console and User
2 Interface for Multisite RF Trunked System, and I
3 have trouble saying the word "console," so bear
4 with me, I don't know why, but I do, and the
5 abstract starts out with, "A dispatcher console,"
6 so yes, it involves a dispatcher console.

7 Q. And the dispatcher console of Downs you
8 consider it to be an end endpoint as described in
9 the '664 patent, right?

10 A. I'm not sure I'm prepared to answer that
11 kind of global question, you know. If you could
12 point me to the part of the patent that uses it,
13 I could answer that more precisely.

14 Q. Sure. If you could to go Page 90 of
15 your Declaration, look at Paragraph 141 at the
16 bottom, if you look it says, "The combined figure
17 below shows a hypothetical communication system
18 that is possible using the EDACS standard, which
19 includes a "Console interface" as "End Point B."
20 Figure 1 of Downs provides a dispatch console
21 interface that could be used in this EDACS
22 communication system." Do you see that?

23 A. Yes.

24 Q. So it's your opinion that the dispatch
25 console of Downs is an endpoint, right?

1 A. I would say in that context, it's being
2 used as an endpoint.

3 Q. If you go to -- strike that. "Downs
4 also discloses that any call received at its
5 dispatcher console, may be an emergency call,"
6 right?

7 A. I assume you're reading that somewhere,
8 but I don't know where you're reading from --

9 Q. Sure, I'm trying to understand, you
10 know, your familiarity with Downs, and I can take
11 you somewhere, if that's what you're asking, so
12 if you go to Page 65 of your Declaration --

13 A. -- 65, you said?

14 Q. I'm sorry, Page 66. Looking at
15 Paragraph 94. You say: "Downs incorporated
16 these features because the dispatchers must be
17 free to concentrate on the substance of the
18 calls, any one of which may be an emergency
19 call," do you see that?

20 A. Yes.

21 Q. So any call received at the Downs
22 console may be an emergency call, right?

23 A. That's what it says here in the quote.

24 Q. Do you agree with that?

25 A. It sounds reasonable.

1 Q. Do you agree with that?

2 A. I don't disagree with it. There's
3 nothing unusual about it that I could see.

4 Q. You're not, sitting here, you're not
5 prepared to agree with Downs' description of its
6 own disclosure that any call could be an
7 emergency call in its system, right?

8 MR. STAVINOHHA: Objection, form.

9 A. Yeah. Well, where my hesitancy is, is
10 when you use absolute terms like "any call." My
11 experience is that there's sometimes, and maybe
12 even usually exceptions to such things, so I
13 don't like using those particular absolute calls.

14 In general, though, I don't see how it
15 would be unreasonable to make the statement that
16 the calls coming into a dispatcher could be an
17 emergency call.

18 Q. (BY MR. KANTAREK) Well, I'm not making
19 the statement, right. You're quoting Downs here,
20 and Downs says, "The dispatchers must be free to
21 concentrate on the substance of the calls, any
22 one of which may be an emergency call," so I'm
23 trying to understand why you disagree with Downs.

24 A. I don't disagree with it.

25 Q. So any of one of the calls to Downs'

1 console may be an emergency call?

2 A. They are making that statement, and I
3 don't have any reason sitting here to dispute
4 that, other than my general qualifier of being
5 reluctant to use absolutes.

6 Q. All right. So Downs' disclosure, if I
7 take you to Column 8, Line 44 of Downs, which is
8 Exhibit 1004.

9 A. I heard Column 8. I didn't hear the
10 line.

11 Q. Column 8, Line 44, I guess I'll start at
12 41 for clarity, it says: "Through the use of the
13 customized keyboard, the dispatcher can choose a
14 particular communications module by depressing
15 the appropriate key 114, e.g. MDL 3 to pick
16 module 3. Once this module has been picked, then
17 the dispatcher can adjust its volume via volume
18 keys 118, mute the module, 116, highlight the
19 module for the select speaker (may be headset),
20 modify the module, 116, or establish (or clear)
21 an emergency condition for the module 124." Do
22 you see that?

23 A. Yes.

24 Q. So Downs discloses establishing
25 emergency condition is done by a dispatcher

1 pressing a key, right?

2 A. Well, this passage is a -- it doesn't
3 use the word "emergency" in it, but that said, of
4 course it's a lot of what this is about.

5 Q. So taking you --

6 A. I'm sorry, go ahead.

7 Q. So taking you to Column 8, Line 48, it
8 says "emergency" right there, right?

9 A. Oh, you're right, sorry.

10 Q. Let me just read it. I'm just going to
11 read Column 8, Line 44 through 48 again: "Once
12 this module has been picked, then the dispatcher
13 can adjust its volume via volume keys 118, mute
14 the module, 116, highlight the module for the
15 select speaker (may be headset), modify the
16 module, 116, or establish (or clear) an emergency
17 condition for the module 124" correct?

18 A. That's what it says.

19 Q. So my question is Downs discloses its
20 emergency condition is identified by a dispatcher
21 pressing a key, right?

22 MR. STAVINOH: Objection to form.

23 A. It says, "establish or clear," but in
24 this particular context it's saying that.

25 Q. (BY MR. KANTAREK) And then if you go to

1 Column 10, Line 55 of Downs it says: "Similarly,
2 when the emergency declare key 120 is depressed,
3 a delay timer, e.g. 1 second, starts in order to
4 delay the issuance of the key code to the
5 personal computer. This delay ensures that the
6 emergency key is held down for a full second and
7 not inadvertently depressed." Do you see that?

8 A. Yes.

9 Q. So this again is a disclosure of using
10 an emergency key stroke by the dispatcher to
11 declare an emergency, right?

12 A. The particular instances or embodiments
13 described here are using a manual key.

14 Q. You're not aware of any disclosure in
15 Downs of an emergency condition, aside from using
16 a manual key, are you?

17 A. I'd have to go back through that, or you
18 can point me. I don't recall this passage being
19 in my Declaration, so if you want to point me to
20 the appropriate place there.

21 Q. Well, I don't -- my question is Downs
22 discloses -- strike that.

23 So I'm telling you or I'm asking you
24 whether you have found a place in Downs that
25 includes a disclosure of an emergency condition,

1 besides the use of a key stroke. So I'm not sure
2 if I can point you to somewhere in your
3 Declaration that doesn't exist.

4 I'm asking you do you know of a
5 disclosure in Downs of an emergency condition,
6 aside from the key stroke by a dispatcher?

7 MR. STAVINOHHA: Objection, form.

8 A. Not off the top of my head. I'm sorry,
9 not off the top of my head.

10 Q. (BY MR. KANTAREK) And if it's not in
11 your Declaration, you don't have that opinion
12 either, right?

13 MR. STAVINOHHA: Objection, form.

14 A. That's a fair statement.

15 Q. (BY MR. KANTAREK) And going back
16 briefly to Column 8, Line 44, this talks about
17 the dispatcher adjusting its volume via volume
18 keys 118, right?

19 A. The dispatcher can just its volume via
20 volume keys 118.

21 Q. And so that's an example of a statically
22 configured channel, right?

23 A. I'm sorry, what's your question again?

24 Q. A statically configured channel that we
25 talked about earlier.

1 A. I'd have to think about that to give a
2 definitive answer. I can't answer it sitting
3 here.

4 Q. You previously agreed -- let me help you
5 out. In the '664 patent we agreed that a static
6 configuration is where the volume of each channel
7 can be manually adjusted by an end user, right?

8 A. That's a statement, yes.

9 Q. And this talks about the dispatcher
10 adjusting its volume via volume keys 118, right?

11 A. Correct.

12 Q. So maybe I'm missing something but
13 that's a statically configured channel, right?

14 MR. STAVINOH: Objection, form.

15 A. I'd have to go back to be certain. The
16 words "statically configured" is not used in this
17 passage, so I would want to read the full context
18 to see if that overall articulation at the front
19 end indeed applies to this.

20 Q. (BY MR. KANTAREK) I'm sorry, so you're
21 not able to decide whether this disclosure in
22 Downs is an instance where the volume of each
23 channel can be manually adjusted by an end user?

24 A. It is describing -- I'm sorry, was
25 there -- it is describing a manual adjustment by

1 the end user.

2 Q. A manual --

3 A. The passage doesn't say anything about
4 statically configured channels, so I would want
5 to go back and make sure that the overall context
6 leading up to this passage is consistent with
7 that or versus potentially describing something
8 else.

9 Q. So you agree that Column 8, Line 44
10 through 48 of -- I'm sorry, through 46 of Downs,
11 discloses manual adjustment of volume by the end
12 user, right?

13 A. Once the module has been picked, then
14 the dispatcher can adjust the volume via volume
15 keys. That seemed like a manual adjustment.

16 Q. It doesn't just seem like a manual
17 adjustment. It's a manual adjustment, right?

18 MR. STAVINOH: Objection, form.

19 A. You can dissect my words. I'm saying it
20 seems like a manual adjustment.

21 Q. (BY MR. KANTAREK) So maybe you could
22 listen to my question. It is a manual
23 adjustment, right? You can say "yes" or you can
24 say "no."

25 MR. STAVINOH: Objection, form.

1 Q. (BY MR. KANTAREK) But adjusting volume
2 via volume keys is a manual adjustment, right?

3 A. It certainly seems like it.

4 Q. So you're not ready to say with absolute
5 certainty that adjusting volume via volume keys
6 is a manual adjustment?

7 A. I am saying it seems like a manual
8 adjustment.

9 Q. Maybe you could listen to my question.

10 A. I listened to your question, and I'll
11 answer it the same way. It seems like a manual
12 adjustment.

13 Q. Okay. So listen to this, so you're not
14 ready to say with absolute certainty that
15 adjusting volume via volume keys is a manual
16 adjustment?

17 A. I think it seems like a manual
18 adjustment. You've picked out a sentence here
19 out of the full specification and with a lot of
20 text leading up to this that potentially could be
21 describing something other than what it seemingly
22 looks like on the surface, which is a manual
23 adjustment.

24 Q. Right. So again, it doesn't seem like
25 you're listening to my question. So my question

1 is about adjusting volume via volume keys, and
2 whether or not it's a manual adjustment, so and
3 whether you can confirm that or if you're just
4 wishy-washy about it, so I guess one last time
5 and you can not answer, if you want. You're not
6 ready to say here today with absolute certainty
7 that adjusting volume via volume keys by an end
8 user is a manual adjustment?

9 MR. STAVINOHHA: Objection, form,
10 argumentative.

11 A. A human pushing a key to adjust the
12 volume I would agree is a manual adjustment.

13 Q. (BY MR. KANTAREK) So if you go to back
14 to 1055 in Downs, this is talking about the
15 emergency declare key 120, right?

16 A. Yes.

17 Q. And if we look at the '664 patent, Claim
18 1, which is Exhibit 1001 in column 8 at Claim 1,
19 this is Column 8, Line 35 is Element 1B it says,
20 "Receiving an alert in one of the media streams."
21 Do you see that?

22 A. You're jumping back and forth between
23 patents here.

24 Q. Right.

25 A. One second, we were talking Downs and

1 now I think you're talking '664.

2 Q. That's right, yeah.

3 A. Okay.

4 Q. So Claim Element 1B is, "Receiving an
5 alert in one of the media streams." Do you see
6 that?

7 A. Yes.

8 Q. An emergency set off via emergency
9 declare key 120 in Downs, is not an alert in one
10 of the media streams that you identify in Downs,
11 right?

12 MR. STAVINOHA: Objection, form.

13 A. I'm sorry, repeat that question.

14 Q. (BY MR. KANTAREK) An emergency declared
15 key 120 in Downs is not an alert in one of the
16 media streams that you identify in Downs, right?

17 MR. STAVINOHA: Objection, form.

18 A. I'd have to think about that. To my
19 knowledge, I did not utilize this passage in my
20 reasoning around this particular limitation.

21 Q. (BY MR. KANTAREK) So why didn't you use
22 it as part of your reasoning around this
23 particular limitation?

24 A. It was a year ago. I don't remember the
25 rationale. I'm pretty sure I used other

1 passages.

2 Q. So you don't remember why you didn't use
3 Downs' emergency declare key as receiving an
4 alert in one of the media streams as claimed in
5 the '664 patent?

6 A. I don't remember a year later.

7 Q. And sitting here today at your
8 deposition for this IPR, you can't say why or why
9 not it would satisfy that claim language?

10 A. I haven't done that analysis, or at
11 least I don't remember that analysis, so I'm not
12 prepared to say one way or another.

13 Q. All right. If you go back to your
14 Declaration, which is Exhibit 1002, Page 66,
15 again, "added features of a complex RF could
16 become a hindrance to the dispatcher, unless the
17 dispatcher is able to quickly and easily operate
18 the dispatch console." Do you see that?

19 A. Yes.

20 Q. So added features could become a
21 hindrance to the dispatcher of Downs, right?

22 A. I think it's -- I don't know where this
23 passage was in Downs specifically. Column 2,
24 which was the background of the invention, so
25 they are -- it's talking about the background and

1 the invention.

2 Q. Right, and in that background Downs says
3 that added features could become a hindrance to
4 the dispatcher, right?

5 A. That's what it says.

6 Q. Why don't we take a break before we go
7 to the next exhibit. So sound good? It's about
8 10:00 o'clock.

9 A. It is a good breaking, yeah.

10 (Brief recess taken.)

11 Q. (BY MR. KANTAREK) Mr. Williams, have
12 you talked to anyone during your break?

13 A. No.

14 (Exhibit 1005 was marked by the
15 reporter for identification.)

16 Q. (BY MR. KANTAREK) I'd like you to turn
17 to Exhibit 1005, please.

18 A. Okay.

19 Q. You call this EDACS, which I'm going to
20 called "EDACS." Does that work for you?

21 A. Yes.

22 Q. All right, so EDACS is a
23 telecommunications systems bulletin, right?

24 A. It's an actual standard, not necessarily
25 just a bulletin.

1 Q. If you look at Exhibit 1005, Page 1, it
2 says "Telecommunications Systems Bulletin,"
3 right?

4 A. I'm sorry, where are you?

5 Q. Page 1.

6 A. Right.

7 Q. At the top in big all caps?

8 A. Oh, yes, you're right. I apologize.
9 It's staring me right in the face, yes, you're
10 correct.

11 Q. So I'm sorry, just so we have a clean
12 question, EDACS is a telecommunications systems
13 bulletin, right?

14 A. Correct.

15 Q. And if you look at the next page, this
16 is Page 2, about four lines down in the Notice
17 section it says, "Existence of such Standards and
18 Publications shall not in any respect preclude
19 any member or nonmember of TIA/EIA from
20 manufacturing or selling products not conforming
21 to such Standards and Publications," right?

22 A. That's what it says, yes.

23 Q. So EDACS doesn't require its members to
24 conform to its disclosures, right?

25 A. I think that's a fair statement.

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1 Q. EDACS also -- I'm sorry, strike that.
2 If you go down to the fourth paragraph, it starts
3 with this bulletin, that's still on Page 2; do
4 you see that?

5 A. Yes.

6 Q. "This Bulletin is not intended to
7 preclude or discourage other approaches that
8 similarly represent good engineering practice, or
9 that may be acceptable to, or have been accepted
10 by, appropriate bodies." Do you see that?

11 A. Yes, sir.

12 Q. So EDACS doesn't preclude or discourage
13 other approaches to the methods contained inside,
14 right?

15 A. Well, I think it is not intended to
16 preclude or discourage is the key term.

17 Q. Sorry. So in your mind it does preclude
18 or discourage other approaches to the methods
19 contained inside?

20 MR. STAVINOH: Objection, form.

21 A. The standards, in general, including TIA
22 standards, Telecommunications Industry
23 Association are intended to essentially encourage
24 certain practices, and in particular, encourage
25 interoperability between a device and systems and

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1 between different manufacturers.

2 So while this statement here says it's
3 not intended to preclude or discourage other
4 approaches, I suspect, though I don't know for
5 certain, that's more of a legal disclaimer. In
6 practicality you disregard its standards at your
7 peril, because you potentially would not
8 interoperate with other people who do follow the
9 standards.

10 Q. So even though EDACS says it's not
11 intended to preclude or discourage other
12 approaches, do you think it does preclude or
13 discourage other approaches?

14 MR. STAVINOH: Objection, form.

15 A. What you're reading is under the Notice
16 which appears to be a legal disclaimer, so yeah.

17 Q. (BY MR. KANTAREK) You're not a lawyer,
18 right?

19 A. I am not a lawyer.

20 Q. So you're basing the fact that this is a
21 legal disclaimer on what experience?

22 A. It's the first thing that comes after
23 the header page and it is written in similar
24 format to my experience to other legal
25 disclaimers.

1 Q. What sort of --

2 A. But I am not a lawyer, so I cannot say
3 for certain this is a legal disclaimer.

4 Q. What sort of legal disclaimers do you
5 read?

6 MR. STAVINOHHA: Objection,
7 relevance.

8 A. I mean user manuals. The first thing
9 you see in many user manuals is some sort of
10 statement to the effect that, "We can't guarantee
11 what's in here is 100 percent." They are just
12 basically covering themselves.

13 Q. (BY MR. KANTAREK) So your -- let's take
14 one step back. You believe this bulletin is
15 intended to preclude or discourage other
16 approaches to this practice, right?

17 MR. STAVINOHHA: Objection, form.

18 A. The core point of having standards in
19 the first place, going through the exercise of
20 getting together all sorts of companies and going
21 through the extremely painful process of hashing
22 out these individual standards, is to get
23 essentially a variety of -- get specifications
24 that hopefully all the parties who are planning
25 on working in this area can agree to, such that

1 there is kind of a standard playbook or
2 blueprint, at least for some functionality, that
3 would facilitate the ability to buy different
4 pieces of equipment for a certain purpose from
5 certain manufacturers and have confidence that
6 they would be able to work together.

7 Q. Okay. So my question was you believe
8 this bulletin is intended to preclude or
9 discourage other approaches to this practice,
10 right?

11 MR. STAVINOHHA: Objection, form.

12 A. It states in its notice that it is not
13 intended to preclude or discourage other
14 approaches that similarly represent good
15 engineering practice or that may be acceptable to
16 or have been accepted by appropriate bodies.

17 Q. (BY MR. KANTAREK) Okay. And you think
18 that's not true?

19 MR. STAVINOHHA: Objection, form.

20 A. It's in here, so I think it's true. I
21 mean its qualifiers I think are fair qualifiers,
22 that represent good engineering practice or that
23 may be accepted or been accepted by appropriate
24 bodies, so meaning it has that qualifier, those
25 qualifiers associated with it.

1 Q. (BY MR. KANTAREK) So if you could go to
2 Page 25 of EDACS, Footnote Page 25, do you see
3 4.5.2.1.2 Emergency Group Call, right?

4 A. Right.

5 Q. So let's talk about how this works. It
6 says: "An emergency call is initiated by
7 pressing the emergency button on the radio." Do
8 you see that, and you identify this emergency
9 button press as the claimed alert in a media
10 stream; is that right?

11 MR. STAVINOHA: Objection, form.

12 A. If you want to -- I'm not sure exactly
13 how I phrased it. If you want to go to that
14 section in the Declaration and see if that
15 phrasing is consistent.

16 Q. (BY MR. KANTAREK) So if you go to Page
17 96 of your Declaration, Exhibit 1002, if you look
18 at Paragraph 155?

19 A. Right.

20 Q. You say, "Downs in view of the EDACS
21 Standard discloses receiving an alert [e.g.,
22 Group Emergency Call Type] in one of the media
23 streams." Do you see that?

24 A. Yes.

25 Q. So the emergency group call type is what

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1 you identify as the claimed alert in Element 1B
2 of the '664 patent, right?

3 A. Its ground.

4 Q. I'm sorry, the answer that the reporter
5 picked up was, "Its ground." So the emergency
6 group call type is what you identify as the
7 claimed alert in Element 1B of the '664 patent in
8 this ground, right?

9 A. Right.

10 Q. Now if you go to Paragraph 157 of your
11 Declaration, which is on the next page and spills
12 over to Page 98, as well, you say, "These
13 emergency calls are "initiated by pressing the
14 emergency button on the radio," and then it goes
15 on to quote more of EDACS, and then the next
16 sentence says, "Thus emergency call requests,
17 each of which would correspond to a claimed
18 alert, are received," do you see that?

19 A. Yes.

20 Q. So is the alert a emergency call request
21 or group emergency call light?

22 A. The pushing of the button on the radio
23 initiates an emergency call request, and that
24 manifests itself as an emergency call in the call
25 type.

1 Q. So my question is about the claim term
2 "alert." I didn't see the term "alert" word in
3 your answer at all. So is the alert the
4 emergency call that you're identifying in
5 Paragraph 155, or the emergency call request that
6 you identify in Paragraph 157?

7 A. Oh, I see what you're saying.

8 MR. STAVINOH: Objection, form.

9 A. I mean you can't disassociate them. The
10 pushing of the button creating a request that
11 manifests itself electronically as an emergency
12 call type, they are all bundled together.

13 Q. (BY MR. KANTAREK) So is pushing the
14 button creating the request, the alert?

15 A. In effect.

16 Q. But also the emergency call --

17 A. It's "initiating" is probably a better
18 term.

19 Q. So the emergency call request itself is
20 the alert?

21 A. The emergency call request is manifested
22 electronically as an emergency call type. They
23 are all inter -- they are all coupled together.

24 Q. So what specifically in the EDACS
25 standard are you identifying as the claimed

1 alert?

2 A. It would be the emergency, the group
3 emergency call type that is initiated by pressing
4 the button on the phone which is creating an
5 emergency call request, manifesting itself
6 electronically as an emergency, a group emergency
7 call type.

8 Q. So all of that is the claimed alert is
9 what you're saying?

10 A. Strictly speaking from an electronic
11 standpoint it would be the emergent, group
12 emergency call type.

13 Q. So what emergency -- strike that. So
14 the group emergency call type, that's section
15 4.5.2.1.2 of EDACS; is that right?

16 MR. STAVINOHHA: Objection, form.

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

18 Q. (BY MR. KANTAREK) Okay. The group
19 emergency call type is Section 4.5.2.1.2 of
20 EDACS, right?

21 A. Right.

22 Q. So that entire section is the claimed
23 alert?

24 MR. STAVINOHHA: Objection, form.

25 A. The first paragraph is describing the

1 process -- well, actually the whole thing is kind
2 of describing the process and the nature of the
3 emergency group call throughout that, including
4 the process I just described, the pushing the
5 button, translating to an emergency call request
6 in the form of an electronic emergency group
7 call.

8 Q. (BY MR. KANTAREK) So my section was so
9 that entire section is the claimed alert. Is
10 that true, or not?

11 MR. STAVINOHA: Objection, form.

12 A. I'm not sure that question can be
13 answered like you phrased it. This section is
14 about emergency group calls which is a call type
15 and it's describing various aspects of it,
16 including the process in which it is initiated
17 and used.

18 Q. (BY MR. KANTAREK) So maybe it will help
19 if we go through it. So the first sentence we
20 talked about says, "An emergency call is
21 initiated by pressing an emergency button on the
22 radio," right?

23 A. Right.

24 Q. Is that a claimed alert, pressing the
25 emergency button on the radio?

1 A. That's initiating the process that will
2 result in the alert.

3 Q. So it's not the alert?

4 A. It's initiating the process that will
5 result in the alert. Without pushing the button
6 there would not be an alert, so you can't
7 decouple them.

8 Q. Well, you're saying the result of that
9 process is the alert, so aren't you decoupling
10 them?

11 A. You're getting into semantics, I guess.

12 Q. Mr. Williams, this whole Declaration is
13 semantics. I'm trying to understand what you
14 identify as an alert, and we're having difficulty
15 for some reason.

16 So it sounds like the pressing of the
17 emergency button on the radio is not the claimed
18 alert, right?

19 MR. STAVINOHA: Objection, form.

20 A. It's what initiates the alert.

21 Q. (BY MR. KANTAREK) Okay. So the next
22 sentence says, "Once initiated, the radio
23 immediately transmits the emergency call request
24 on the inbound control channel." Do you see
25 that?

1 A. Right.

2 Q. So is the emergency call request on the
3 inbound control channel the alert?

4 A. The emergency call request in the form
5 of an emergency call -- the emergency group call
6 type is the alert.

7 Q. So then so what does this emergency call
8 request look like in EDACS?

9 A. It manifests itself as the group
10 emergency call type. You say how it manifests.

11 The specifics of it, there's the digital
12 voice version of it, there's an analog version of
13 it, so it's kind of a strange question
14 specifically.

15 Q. So where in the EDACS is the digital
16 voice version and the analog version of it?

17 MR. STAVINOH: Objection, form.

18 A. I'm not sure I understand your question.

19 Q. (BY MR. KANTAREK) These are your words,
20 right? You said specifics of it, the digital
21 voice version of it, there's an analog version of
22 it, so it's kind of a strange question
23 specifically, so I'm asking you where in EDACS
24 does it describe the digital voice version and
25 the analog version of the emergency call request

1 that you just said exists.

2 MR. STAVINOH: Objection, form.

3 A. There's a table on Page 24, the page
4 immediately prior to that that shows that. I'd
5 have to go back and re-read to get any -- get
6 more specific information about any differences
7 between the two.

8 Q. (BY MR. KANTAREK) So once -- so we
9 talked about the emergency call requests on the
10 inbound control channel. Next, it says, "The
11 system receives the request and assigns the
12 emergency call to a free channel." Do you see
13 that?

14 A. Yes.

15 Q. And that's a working channel, right, the
16 free channel?

17 A. Correct.

18 Q. And then it says, "If all channels are
19 busy, the request is placed at the top of the
20 queue, where it will be assigned the first
21 available channel," right?

22 A. Yes, that's what it says.

23 Q. And the first available channel has to
24 be a working channel, right?

25 A. I think that's correct.

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1 (Exhibit 1031 was marked by the
2 reporter for identification.)

3 Q. (BY MR. KANTAREK) Now we talked a
4 little bit about Downs, we talked a little bit
5 about EDACS. In your Declaration you suggest
6 that Downs and EDACS, itself, in combination, can
7 be combined with Childress, which is Exhibit
8 1031, right?

9 A. I don't have that paper copy. I assume
10 that's correct.

11 Q. Could you open you be Exhibit 1031; it
12 should be in the Marked Exhibits.

13 A. Yes, that's correct.

14 Q. Sorry so just so we have it clear, you
15 argue that a POSITA would be motivated to combine
16 the Downs/EDACS combination with Childress, as
17 well, right?

18 A. Yes. I don't remember exactly what page
19 that is on, but certainly it's a section.

20 Q. And just to be clear, Childress is U.S.
21 Patent Number 4,905,302, Exhibit 1031, right?

22 A. Correct.

23 Q. So if you go to Column 28 of Childress,
24 at the top it says: "Radio Call Sequence-Radio
25 Origination, Emergency Group Call," right?

1 A. Correct.

2 Q. Let's discuss EDACS, and here at 28:4 it
3 says: "Control channel transmits a continuous
4 stream of control messages which all inactive
5 mobiles receive." Do you see that?

6 A. Yes.

7 Q. That's not the same as the EDACS control
8 channel, is it?

9 MR. STAVINOH: Objection, form.

10 A. I'd have to go back and look at that
11 again. I can't answer off the top of my head.

12 Q. (BY MR. KANTAREK) You can't answer off
13 the top of your head if the control channel in
14 Childress described that Column 28, Line 4 is the
15 same as the control channel described in EDACS?

16 A. I can't answer. I don't think I used
17 this passage of Childress in the Declaration, so
18 I'd have to go back and look at it.

19 Q. So sorry, so you don't understand what
20 Childress is saying in Column 28, Lines 4 through
21 5?

22 MR. STAVINOH: Objection, form.

23 A. I'm saying I did not, I believe, use
24 this portion of Childress in my Declaration and I
25 haven't looked at this for awhile, so to answer

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1 your question is an analysis that has been a long
2 time since I've looked at it and I'd have to do.

3 Q. (BY MR. KANTAREK) Okay. Let me take
4 you to -- if you can open the EDACS and go to
5 Page 50.

6 A. I'm sorry, open what?

7 Q. Page 50 of the EDACS, which is Exhibit
8 1005, and if you could keep Childress up, as
9 well. If you look near the bottom of Page 50 of
10 EDACS, it is the glossary for the term "Control
11 Channel," do you see that?

12 A. Yes.

13 Q. So it says the control channel is: "The
14 repeater channel on which system control
15 information is continually transmitted and
16 channel request/status information is received
17 from the field radio units." Do you see that?

18 A. Yes.

19 Q. And it says in the last sentence it
20 says, "The field radios monitor the control
21 channel when not active on a working channel."
22 Right?

23 A. Right.

24 Q. And back to Childress, Column 28, Line 4
25 says, "Control channel transmits a continuous

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1 stream of control messages which all inactive
2 mobiles receive." Do you see that?

3 A. Yes.

4 Q. And so you're not, sitting here today
5 you're not able to analyze whether those are
6 different?

7 A. I mean the wording is the same and the
8 wording is consistent with control channels
9 generally, but I haven't done the analysis of the
10 specifics such as listed here in Childress, in
11 terms of all the different bit configurations for
12 each of the individual fields relative to EDACS.

13 I just haven't done that kind of next
14 level of detailed analysis to see the
15 commonalities and similarities or not.

16 Q. Well, the control channel of Childress
17 transmits a continuous stream of control
18 messages, right?

19 A. Yes.

20 Q. And the control channel of EDACS
21 continually transmits system control information,
22 right?

23 A. That's a fair statement.

24 Q. So what's the difference between those
25 two?

1 A. It doesn't mean they do it in exactly
2 the same way. Control channel is a term that
3 covers, as described for example in EDACS, in
4 which system control channels continually
5 transmitted and channel request status
6 information is received.

7 There is from -- there are many types of
8 control channels that fit that description that
9 don't necessarily have the same fields and
10 format.

11 Q. So we talked about how Childress'
12 control channel -- the control channel described
13 in Childress, and the control channel described
14 in EDACS transmit a continuous stream of control
15 messages, right?

16 A. That's a fair statement.

17 Q. And they both also are monitored by all
18 inactive mobiles, right?

19 A. Correct.

20 Q. And so I guess what -- strike that. If
21 you go down to Column 28, Line 16 --

22 A. I'm sorry, which are we in, Childress?

23 Q. Childress, Column 28, Line 16, slightly
24 down that column.

25 A. Oh, I see, okay.

1 Q. It says B: "Mobile that wishes to
2 originate an emergency group call transmits an
3 assignment request on the control channel in
4 synchronism with the received control channel
5 messages." Right?

6 A. That's what it says.

7 Q. And in EDACS if you turn back to Page
8 25, do you see that?

9 A. I see Page 25.

10 Q. And under Emergency Group Call, we
11 talked about this says: "An emergency call is
12 initiated by pressing the emergency button on the
13 radio. Once initiated, the radio immediately
14 transmits the emergency call request on the
15 inbound control channel." Do you see that?

16 A. Yes.

17 Q. I mean what's the difference between
18 that and the disclosure in Childress that a
19 mobile that wishes to originate an emergency
20 group call transmits an assignment request on the
21 control channel?

22 A. I was just a little bit behind your
23 question. Can you repeat it?

24 Q. Sure. What's the difference between the
25 disclosure in EDACS of: "An emergency call is

1 initiated by pressing the emergency button on the
2 radio. Once initiated, the radio immediately
3 transmits the emergency call request on the
4 inbound control channel," what's the difference
5 between that and the disclosure at Childress at
6 Column 8, Line 16: "Mobile that wishes to
7 originate an emergency group call transmits an
8 assignment request on the control channel"?

9 MR. STAVINOHHA: Objection, form.

10 A. They seem similar. This is an
11 assignment request, and I don't believe I used
12 this passage in Childress in my Declaration, so I
13 would need to go back to be able to do an apples
14 to apples comparison, and I'm not prepared to
15 doing that as we sit here.

16 Q. (BY MR. KANTAREK) So your issue is the
17 phrasing of assignment request; is that what you
18 said?

19 A. The issue is the Devil is in the
20 details. The control channels do very similar
21 things. They do what control channels in
22 wireless communications generally do, and when
23 you get to a certain level of detail in terms of
24 individual fields of the control channel, and
25 what the bit size is, and what's containing all

1 of that, then the details can be different, but
2 that doesn't change the purpose of the control
3 channels, for this purpose.

4 Q. Would you need to know those details to
5 determine whether Downs could be combined with
6 EDACS or Childress?

7 A. No.

8 Q. Okay. So why do you need those details
9 to tell me whether Childress is similar to EDACS?

10 A. I would say it is likely similar, but
11 that would be a qualitative question. Your
12 questions up until now have been much more
13 specific, and I would need to do an analysis to
14 be able to answer.

15 Q. So the fact that Childress says, "Mobile
16 that wishes to originate an emergency group call
17 transmits an assignment request on the control
18 channel," under the section called Emergency
19 Group Call, isn't enough for you to compare that
20 to EDACS's disclosure of an emergency group call
21 where, "An emergency call is initiated by
22 pressing the emergency button on the radio; once
23 initiated, the radio immediately transmits the
24 emergency call request on the inbound control
25 channel. The system receives the request and as

1 signs the emergency call to a free channel"?

2 MR. STAVINOH: Objection, form.

3 Q. (BY MR. KANTAREK) That's not enough
4 for you to compare the two?

5 A. They use the same terms, they have the
6 control channel, they use them for the same
7 purpose. Indeed, I would view that similarity as
8 helpful to the motivation to combine, but your
9 questions up to now have been asking for what I
10 interpreted as a definitive analysis of comparing
11 the two at every level of detail, which would
12 include the different fields and size and format
13 of the individual control channel elements for
14 each one, and I haven't done that kind of, that
15 level of detailed comparison that I think I heard
16 your question requiring.

17 Q. I see. So let me change it a little
18 bit. Would a POSITA at the time of the invention
19 of the '664 patent consider this disclosure in
20 Childress to teach the same thing as this
21 disclosure in EDACS?

22 A. It's talking about control channels, and
23 it's talking about use for emergency purposes.
24 Like I said, I don't believe I used any of this
25 Column 28 in my Declaration, so typically the

1 level of detail that's asserted here or described
2 here, excuse me, and so like I said, I answered,
3 in trying to answer your questions, it was
4 phrased such that you wanted, that I interpreted
5 as being requiring an exact, you know, field by
6 field, bit by bit comparison, and I haven't done
7 that.

8 Q. Remember, I just told you that I changed
9 my question. Please answer my question without
10 injecting that thought into it.

11 I said would a POSITA at the time of the
12 invention of the '664 patent consider this
13 disclosure in Childress to teach the same thing
14 as the disclosure in EDACS that we're talking
15 about?

16 MR. STAVINOKA: Objection, form,
17 argumentative.

18 A. And by "same thing," what do you mean by
19 "same thing"? How do you define "same thing"?

20 Q. (BY MR. KANTAREK) Would a POSITA --
21 okay. So you opine that the emergency call,
22 group call type section of EDACS discloses the
23 alert, the claimed alert in the '664 patent,
24 Claim 1, right?

25 A. Right.

1 MR. STAVINOHHA: Objection, form.

2 Q. (BY MR. KANTAREK) So the disclosure in
3 EDACS here is enough for you to make that claim,
4 right?

5 A. In my Declaration, I describe fully, not
6 just in a summary, partial sentence, how I think
7 a POSITA would have combined Downs, and modified
8 by EDACS, with Childress.

9 Q. Okay. My question was the disclosure in
10 EDACS of 4.5.2.1.2 is enough for you to opine
11 that it discloses the alert claimed in the '664
12 patent, Claim 1, right?

13 MR. STAVINOHHA: Objection, form.

14 A. As we've talked about.

15 Q. (BY MR. KANTAREK) Is that a "yes"?

16 A. I'm not sure I fully understand your
17 question. We talked about EDACS.

18 Q. Let me ask the question again.

19 A. Yes.

20 Q. The disclosure in EDACS of 4.5.2.1.2 is
21 enough for you to opine that it discloses the
22 alert claimed in the '664 patent, Claim 1, right?

23 A. You're summarizing in a sentence a more
24 complete argument about that, so unless you want
25 me to go back and re-read that whole section, I'm

1 reluctant to paraphrase in a summary fashion a
2 whole argument in one sentence.

3 Q. So the citations to EDACS that you use
4 in Paragraphs 154 to 159 of Exhibit 1002 of your
5 Declaration, is enough for you to opine that it
6 discloses the alert claimed in the '664 patent,
7 right?

8 A. To be complete, I'd say it's Paragraphs
9 147 to 159.

10 Q. So Paragraphs 147 through 153, are
11 regarding Element 1A, monitoring media streams
12 associated with channels in a communications
13 environment, right?

14 A. Right.

15 Q. And that doesn't talk about an alert,
16 right?

17 A. It talks about media streams which is
18 also in Paragraph 1B, so I would view that they
19 would need to be.

20 Q. Okay. So maybe again you could listen
21 to my question, and I will ask it again. The
22 citations to EDACS that you use in Paragraphs 154
23 to 159 of Exhibit 1002 is enough to opine that it
24 discloses the alert claimed in the '664 patent,
25 right?

1 MR. STAVINOHHA: Objection, form.

2 A. I would have the starting paragraph as
3 147, not 154.

4 Q. (BY MR. KANTAREK) So even though
5 Paragraphs 147 through 153 are included in
6 Section B regarding Claim Element 1A, which
7 doesn't mention an alert, you would say those are
8 part of your opinion as to what in EDACS
9 discloses the alert?

10 A. For completeness, I would include those
11 paragraphs. I would have to go back and re-read
12 all of those paragraphs to try and get at the
13 very specific thing that I don't think I'm
14 getting at in your question.

15 Q. Sorry, so I guess now we have to ask the
16 question about your Declaration generally. You
17 use headers, for example, Page 93 of your
18 Declaration. Header 2B says, "1A, monitoring
19 media streams associated with channels in a
20 communications environment;" do you see that?

21 A. Yes.

22 Q. So the disclosure in that section is
23 also part of the Section that starts on Page 96
24 which reads 1B, receiving an alert in one of the
25 media streams?

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1 A. 1B is focused on receiving an alert in
2 one of the media streams. The reason I am saying
3 for completeness that it would be better to start
4 at 147 is it discusses what meets the needs of
5 the term media streams, which is used in 1B.

6 Q. Right. And you understand that my
7 question is about the term alert, right, and has
8 been for the past five times I've asked it?

9 MR. STAVINOH: Objection, form,
10 argumentative.

11 A. I'm not trying to be difficult. I don't
12 think the word alert is in Paragraphs 147 to 153,
13 if that helps your question.

14 Q. (BY MR. KANTAREK) Well, alert is not
15 part of the claim limitation that you discuss in
16 Paragraphs 147 through 153, right?

17 A. That's correct.

18 Q. So why would those paragraphs need to be
19 included in your opinion on what the claimed
20 alert is for completeness?

21 A. Because it describes -- that's the first
22 place media streams comes up in the claim, and
23 the term media streams also appears in 1B,
24 receiving alert in one of the media streams, so
25 it seems relevant to me.

1 Q. I see. So you think -- all right. So
2 1A and 1B are -- your opinion -- strike that.
3 Your opinions on Claim Element 1 A and 1B in
4 Ground 1 -- strike that. Let's go back to Column
5 28 of Childress.

6 A. Okay.

7 Q. If you look at 2842 through 43 it says,
8 in Childress it says, "All mobiles of the call
9 groups switch to assigned working channel and
10 receive a confirmation message;" do you see that?

11 A. Yes.

12 Q. In EDACS if we're back at Page 25 --
13 sorry, strike that. Let's not move to EDACS if
14 you go to Page 98 of your Declaration, which is
15 Exhibit 1002, it talks about emergency, it says
16 in the middle of that Paragraph 157, it says,
17 "Thus, emergency call requests, each of which
18 would correspond to a claimed alert, are received
19 on the inbound control channel monitored by the
20 dispatch console and assigned the highest
21 priority. 'All members of the talk group are
22 notified of the emergency condition' and begin
23 communicating on the working channel as shown in
24 Figure 12." Do you see that?

25 A. I'm sorry I was looking at Paragraph 98,

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1 not Page 98. I was listening to what you said.
2 Yes, I see that.

3 Q. And so if you look at EDACS, Page 51,
4 this is what you float here. You cite EDACS,
5 Page 43, but Page 43 is also Page 51 of the
6 footer, right?

7 A. All right. Sorry, which page of the
8 footer?

9 Q. That's okay. Page 51 of EDACS in your
10 Declaration you quote, this at the end of
11 Paragraph 157 as Page 43, but it's the same page,
12 right?

13 A. So I'm on Page 51 of the footer of the
14 Declaration.

15 Q. I'm sorry, Page 51 of the footer of
16 EDACS?

17 A. Of EDACS.

18 Q. Yes.

19 A. Okay.

20 Q. And Page 98 of the footer of your
21 Declaration.

22 A. All right, I'm on Page 51 of the footer
23 of EDACS and also on Page 98 of the footer of my
24 Declaration.

25 Q. Okay. And at the end of the paragraph

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1 on Page 98 of your Declaration it says: "All
2 members of the talk group are notified of the
3 emergency condition and begin communicating on
4 the working channel as shown in Figure 12."

5 Right?

6 A. Yes, that's what it says.

7 Q. And that's a quote from the definition
8 of "emergency" in EDACS, right?

9 MR. STAVINOHHA: Objection, form.

10 A. That's correct.

11 Q. (BY MR. KANTAREK) And the emergency
12 definition says: "An 'Emergency' message is
13 initiated by the caller and automatically
14 transmitted by the radio on the control channel.
15 The system automatically assigns the highest
16 priority to the talk group. All members of the
17 talk group are notified of the emergency
18 condition." Do you see that?

19 A. Yes.

20 Q. And looking back at Childress, Column
21 28, Line 42 it says, "All mobiles of the call
22 group switch to assigned working channel and
23 receive a confirmation message;" do you see that?

24 A. Yes.

25 Q. What's the difference between receiving

1 a confirmation message and being notified of the
2 emergency conditions?

3 A. I'd have to go back to both of those to
4 answer your question definitively. They could be
5 the same thing. They might be something
6 different.

7 Q. In your understanding of EDACS, when
8 mobiles of a call group are switched to an
9 assigned working channel would they receive a
10 confirmation message?

11 A. All members of the talk group are
12 notified of the emergency condition, so they
13 would receive some sort of indication or message.
14 Whether that was exactly in the form of a
15 confirmation message as Childress describes it,
16 or not, I don't know off the top of my head.

17 Q. All right, let's go to the beginning of
18 Childress. We've talked a little bit about
19 Column 28. I just want to ask you generally,
20 Childress discloses a trunked radio repeater that
21 transmits a continuous stream of messages, right?

22 A. Where are you reading? It's a trunk
23 radio repeater system.

24 Q. We read in Column 28, Line 4 through 5
25 it says, "A. Control channel transmits a

1 continuous stream of control messages," and if
2 you also look at Column 15, Line 14, it says,
3 "The control channel transmits an outbound
4 continuous transmission repeating the format 800
5 depicted in FIG. 10." So it sounds like you
6 agree that Childress discloses a trunked radio
7 repeater, right?

8 A. Right.

9 Q. And then Childress also discloses that
10 this trunk radio repeater transmits a continuous
11 stream of messages, right?

12 A. It certainly can transmit a continuous
13 stream. I don't know if that's -- I don't
14 remember off the top of my head about
15 non-continuous streams, but it certainly says
16 continuous.

17 Q. And it can transmit a continuous stream
18 on a control channel, right?

19 A. I think that's what that passage said in
20 Column 28.

21 Q. So it can transmit a continuous stream
22 on a control channel, right?

23 A. Well, to be precise, the control channel
24 transmits a continuous stream of control
25 messages. I think you said "on" not "of."

1 Q. Okay. Let me see, I think we're at a
2 good breaking point. Could we take maybe a
3 5-minute break so it's short and then we can come
4 back. Sorry, let's go off the record.

5 (Recess)

6 Q. (BY MR. KANTAREK) All right, let's
7 move to your Declaration which is Exhibit 1002 at
8 Page 93, please, Paragraph 147.

9 You can put Childress away. We're going
10 to be talking about Downs and EDACS, if you can
11 get those handy.

12 A. Okay.

13 Q. So in your Declaration, Page 93,
14 Paragraph 147 you say, "Downs in view of EDACS
15 discloses 'monitoring [e.g., by dispatch console
16 10] media streams [e.g., continuous voice and
17 associated data signals from talk group sent to
18 multisite switch 28], associated with channels
19 [e.g., control channel and working channels] in a
20 communication environment.'" Do you see that?

21 A. Yes.

22 Q. In this paragraph and in this
23 combination you talk about the monitoring being
24 done by Downs dispatch console 10, right?

25 A. Yes.

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1 Q. And then you identify the media streams
2 as continuous voice and associated data signals
3 from top groups sent to multi-site switch 28,
4 right?

5 A. I'm sorry, repeat that.

6 Q. You identify the media streams as
7 continuous voice and associated data signals from
8 top groups sent to multi-site switch 28, right?

9 A. Yes, yes.

10 Q. And so those are what you identify as
11 media streams of Downs, yes?

12 MR. STAVINOHHA: Objection, form.

13 A. The whole disclosure is Downs in view of
14 EDACS and then what you just described is the
15 summary paragraph with the details in the
16 subsequent paragraph.

17 Q. (BY MR. KANTAREK) Well, multi-site
18 switch 28 is part of Downs, right?

19 A. Yes.

20 Q. So are the continuous voice and
21 associated data signals from the top group from
22 EDACS or from Downs?

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

24 Q. Are the continuous voice and associated
25 data signals from the top group from EDACS or

1 from Downs?

2 Do you need me to ask the question again
3 Mr. Williams?

4 A. Yeah, ask the question again, please.

5 Q. Are the continuous voice and associated
6 data signals from the top group that you describe
7 here in Paragraph 147, are those from EDACS or
8 from Downs?

9 A. I think they are both Downs and EDACS
10 describes that. I would say particularly with
11 respect to the sent to multi-site switch 28, that
12 that's D for Downs. Excuse me.

13 Q. So in Paragraph 148, the third line you
14 say, "Downs discloses that 'the dispatcher
15 console must now be informed of the individual
16 transmitters and channels that are being used,
17 and of the status of other transmitters and
18 receivers in the system' (monitoring media
19 streams associated with channels in a
20 communication environment)." Do you see that?

21 A. Yes.

22 Q. So the media streams of Downs are the
23 monitored -- are on the monitored channels; is
24 that right?

25 MR. STAVINOH: Objection, form.

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1 A. I think that's a fair statement.

2 Q. (BY MR. KANTAREK) And in Paragraph 151
3 you talk about, this is on the next page, Page
4 95, Paragraph 151 of Exhibit 1002, it says,
5 "Downs takes this information about 'the
6 individual transmitters and channels that are
7 being used, and of the status of other
8 transmitters and receivers in the system,' and
9 'presents information on ongoing communications
10 throughout the RF system and historical
11 information on recently terminated calls... in an
12 array of communication module windows.'" Do you
13 see that?

14 A. Yes.

15 Q. So if you go to Figure 2 of Downs, which
16 is Exhibit 1004 --

17 A. Okay.

18 Q. -- A1 through A14, these are the
19 communication module windows of Downs' dispatch
20 console that you describe in Paragraph 151,
21 right?

22 If you're not sure, you can go to Downs
23 at Column 6, Line 19 through 25 where it says:
24 "Communications module windows 44 are arranged
25 conveniently in columns and rows. These modules

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1 provide call access to individual groups,
2 entities, consoles and telephone lines in the
3 system. Each communication module is programmed
4 by the dispatcher to represent a particular
5 group, unit, console, channel, line, etc. that is
6 available to the console."

7 A. Right. The answer to your question is
8 yes.

9 Q. So each communication module window
10 denotes a channel, right, in Downs?

11 MR. STAVINOHHA: Objection, form.

12 A. Well, to be precise, it says, "Each
13 communication module is programmed by the
14 dispatcher to represent a particular group, unit,
15 console, channel, line, etc. that is available to
16 the console."

17 Q. (BY MR. KANTAREK) Sorry that word
18 again.

19 A. I don't -- it's usually words with the
20 letter "r" in it but for some reason I cannot say
21 that word.

22 Q. At least we don't have to "Negalarra"
23 any more. If you look at Figure 2, so let me
24 correct my question, each communication module
25 window can denote a channel in Downs, correct?

1 A. Yes.

2 Q. Do you if -- strike that. When a
3 communication module window of Downs denotes a
4 channel, you don't believe that that channel is
5 the claim -- is one of the claimed channels in
6 the '664 patent, right?

7 MR. STAVINOH: Objection, form.

8 A. No, I am not necessarily saying that.
9 Downs only gets to a certain level of detail
10 about channels and how they work, and that's one
11 of the key motivations to combine to bring in
12 EDACS, because it does get to that next level of
13 detail about how to do it.

14 Q. (BY MR. KANTAREK) Gets to the next level
15 of detail about how to do what?

16 A. How to do the various communications
17 functions in the context of a channel discussion,
18 EDACS brings in their control channel and working
19 channel elements, and more specifics about how
20 that could be implemented.

21 Downs only goes to a certain -- to a
22 higher level of detail, so in my view a POSITA
23 would be motivated to bring in EDACS to get to
24 next level of details about how to implement.

25 Q. So you brought up that EDACS brings in

1 the control and working channel elements. In
2 your combination at the console of Downs, would
3 each of the working channel and the control
4 channel have a different communication module
5 window?

6 A. Not necessarily.

7 Q. All right. We'll come back to that in
8 just one minute. I want to confirm a few more
9 things about Downs. If you go to Figure 3 of
10 Downs, it's the next page, this is an example of
11 a communication module window, right?

12 A. Where are you at?

13 Q. Figure 3 of Downs, it's the next page
14 after Figure 2?

15 A. Figure 3 in Downs, okay.

16 Q. So Figure 3 of Downs is an example of
17 one of the communication module windows of Downs'
18 console, right?

19 A. The description in the drawings is that
20 Figures 3 to 5 illustrate portions of the display
21 screen shown in Figure 2.

22 Q. Right. My question is we talked about
23 how Figure 2A through 14 are communication module
24 windows, right?

25 A. Yes.

1 Q. And if you look at Figure 3 it says A2
2 at the top.

3 A. That's correct.

4 Q. So Figure 3 is an example of one of
5 these communication module windows, right?

6 A. I think that's fair.

7 Q. And Item 68 is an emergency call
8 indicator, right?

9 A. I believe that is true.

10 Q. And Item 81 is a background caller that
11 is red if it gets an emergency call, right?

12 A. Umm --

13 Q. If you look at Column 6, Line 39 through
14 41. It says: "The background color 81 of the
15 module is changed to red to signify an emergency
16 call and to green to signify the select call."
17 Do you see that?

18 A. Yes.

19 Q. So Item 81 is a background caller, which
20 is red if it's an emergency call, right?

21 A. Correct.

22 Q. And as we discussed before an emergency
23 call notation exists when the dispatcher at the
24 console holds an emergency button, right?

25 A. We discussed how the person on the

1 transmitting end pressed the emergency button on
2 their radio.

3 Q. You might be confusing that with EDACS.
4 If you go back to Downs, Column 10, Line 55, it's
5 just cutting through the chaff here it says:
6 "Similarly, when the emergency declare key 120 is
7 depressed, a delay timer, e.g. 1 sec., starts in
8 order to delay the issuance of the key code to
9 the personal computer. This delay ensures that
10 the emergency key is held down for a full second
11 and not inadvertently depressed." Do you see
12 that?

13 A. Yes.

14 Q. So the emergency indication exists when
15 a dispatcher at the console presses the emergency
16 call button, right?

17 A. I'm not sure this is limiting itself or
18 specifying itself to the dispatcher pushing that
19 button. I mean this whole section looks like
20 it's a highly technical description of how all
21 the various pieces, parts operate. But wait,
22 you're right, you're right, the dispatcher will
23 hold down a key.

24 That's what this says, but that's not
25 necessarily at all how the whole process begins

1 with, which would in my view either would be
2 viewed as the original transmitter pressing an
3 emergency key on their radio and sending it
4 through the control channels to the dispatcher,
5 and then the dispatcher certainly in its
6 transmission to other parties could do something
7 similar on its console if it so chooses.

8 Q. So just to be clear, we're talking about
9 just Downs. Downs, as you mentioned, is the
10 dispatcher pressing an emergency key. That's the
11 only disclosure of an emergency condition in
12 Downs that we have talked about before, right?

13 A. I'd have to go back to see if that's the
14 only place where the key being held down is
15 mentioned.

16 Q. Sitting here today, you don't know of
17 any other disclosure in Downs about how an
18 emergency alert is identified, right?

19 A. I'd have to go back and review my
20 Declaration, too, but I don't remember it off the
21 top of my head, right this instance.

22 Q. So if it's not in your Declaration and
23 you can't remember it right now, it's not one of
24 your opinions, right?

25 MR. STAVINOH: Objection, form.

1 A. I mean my Declaration is my opinions.

2 Q. (BY MR. KANTAREK) And you don't have
3 any opinions on the emergency key strokes in
4 Downs that are not contained in your Declaration,
5 right?

6 A. Unless, like I said, I don't remember if
7 there is another depressing a key related
8 embodiment elsewhere in Downs that is outside of
9 the dispatcher. I just don't recall.

10 Q. If you could just listen to my question
11 and answer it. I said you don't have any
12 opinions on the emergency keystrokes in Downs
13 that are not contained in your Declaration,
14 right?

15 MR. STAVINOHHA: Objection,
16 argumentative.

17 A. I think that's fair.

18 Q. (BY MR. KANTAREK) So as we were talking
19 about Figure 3, Item 81 is the background color
20 which is red if it's an emergency call, and so
21 this emergency alert appears in a communication
22 module window in Downs, right?

23 A. Right.

24 Q. And each module window in Downs -- I'm
25 sorry, strike that. Is this emergency alert in a

1 channel in Downs?

2 A. It has come through a channel.

3 Q. So we were talking about briefly how you
4 claim the monitoring of Claim 1 of the '664
5 patent is done by dispatch console 10 of Downs in
6 your combination, right?

7 A. Right.

8 Q. So, and we talked about how Figure 2 is
9 an image of the dispatch console screen, right?

10 A. Yes.

11 Q. I promise we would get back to talking
12 about this. In your proposed combination, where
13 would a control channel show up in Dispatch
14 Console 10? And you can feel free to use Figure
15 2, if it's helpful.

16 A. Yeah. I'm using Figure 2 and Figure 3.
17 The group emergency call type would come through
18 on the control channel, and it, in my opinion,
19 would manifest itself as being an emergency call
20 indicator for item 68 as well as triggering what
21 would be the red background.

22 Q. And that would come in on a
23 communication module window set to the control
24 channel; is that right?

25 A. In the combination it would come through

1 the control channel.

2 Q. Okay, and then when it is moved to a
3 working channel, where would the working channel
4 show up in the module of Downs?

5 A. I'd have to go back to all of those
6 other little mini windows within Figure 3. Do
7 you want me to do that?

8 Q. Yeah, I'm asking when the call is moved
9 to a working channel, where would the working
10 channel communication module window show up in
11 Downs' console?

12 MR. STAVINOHA: Objection, form.

13 A. It would likely show up in one of those
14 other windows, or at least some portion of those
15 other windows. Like I said, sitting here I don't
16 remember exactly what all of those other windows
17 within Figure 3 represent.

18 Q. (BY MR. KANTAREK) So the working
19 channel would be one communication module window,
20 and the control channel would be a different
21 communication module window, right?

22 MR. STAVINOHA: Objection, form.

23 A. Not necessarily.

24 Q. (BY MR. KANTAREK) Okay, well, it's
25 your combination, so in your opinion when you

1 combine EDACS and Downs as you propose, you've
2 said that the control channel would have one
3 communication module window, and then you said it
4 would likely -- you said the working channel
5 would likely show up in one of those other
6 windows.

7 So I'm just wondering if that's true, or
8 not necessarily true, because you've said both
9 now?

10 A. Well, I did not do that level of
11 detailed mapping of EDACS to Figure 3 of Downs.
12 The overall motivation was around, or part of the
13 overall motivation for combining them was that
14 EDACS provided an additional level of detail of
15 information, particularly around how the
16 controlling working channel aspects of EDACS,
17 because the Downs was, as we discussed, only got
18 to a certain level of detail.

19 That does not mean that I then went and
20 did an individual mapping to every figure and
21 self-figure element within Downs about how EDACS
22 would fill that function, so sitting here today I
23 can't answer any more specifically.

24 Q. So despite the fact that you say EDACS's
25 control channel and working channel would be

1 monitored by Downs' dispatch console, you have
2 not done the level of mapping to determine how
3 the control channel and working channel would
4 show up in that console?

5 MR. STAVINOHHA: Objection, form.

6 A. As I mentioned, in my view it's about
7 teaching the next level of detail associated with
8 how the various channels work, that Downs doesn't
9 get into that level of detail about.

10 At a minimum, just sitting here right
11 now the -- in my view the emergency call type
12 that comes in on the control channel would
13 manifest itself in the emergency call element 68
14 of Figure 3, as well as the red background of the
15 monitor, but I didn't do a complete mapping of
16 all of that.

17 The working channel would then have the
18 additional information that a POSITA would
19 presume to -- would view as further populating
20 that monitor window. I just didn't do that
21 mapping.

22 Q. You didn't do a mapping of how EDACS's
23 working channel, control channel would show up in
24 Downs dispatch console 10, right?

25 MR. STAVINOHHA: Objection, form.

1 A. I did not do it, to how it would show up
2 in the Figure 3 that I thought we were
3 discussing. I'd have to go back to my
4 Declaration to see -- to fully articulate it,
5 specifically in terms of the various channels
6 with respect to the dispatcher 10 console as a
7 whole.

8 Q. (BY MR. KANTAREK) The Declaration is
9 right in front of you, Mr. Williams, and in
10 Paragraph 147 you say: "Downs in view of EDACS
11 discloses "monitoring [e.g., by dispatch console
12 10] media streams [e.g., continuous voice and
13 associated data signals from talk group sent to
14 multisite switch 28] associated with channels
15 [e.g., control channel and working channels."

16 So feel free to read those paragraphs,
17 but it sounds like that despite the fact that you
18 say EDACS's control channel and the working
19 channel would be monitored by Downs' dispatch
20 console, you have not done the level of mapping
21 to determine how the control channel and working
22 channel would show up on that console, right?

23 MR. STAVINOKA: Objection, form,
24 argumentative.

25 A. I haven't done that specific level of

1 mapping to, for example, Figure 3 of Downs.

2 Q. (BY MR. KANTAREK) Well, what about for
3 Figure 2 of Downs?

4 A. I don't think I mentioned Figure 2 in
5 that section.

6 Q. And so you didn't do it in your
7 Declaration, and you are not willing to do it
8 sitting here today; is that right?

9 MR. STAVINOHA: Objection, form.

10 A. I didn't do it in the Declaration
11 because I felt what was provided in the
12 Declaration was sufficient to show the motivation
13 to combine of those two, particularly with
14 respect to EDACS providing that next level of
15 detail about how the various channels worked
16 together.

17 Q. (BY MR. KANTAREK) So your
18 Declaration --

19 A. Sitting here today if you want me to go
20 and do the mapping for the additional Figure 3
21 elements, I can do that.

22 Q. Again, Mr. Williams, we're talking about
23 Figure 2, and we had talked about, I asked you if
24 you could tell me where in Figure 2 the control
25 channel and working channel of EDACS would appear

1 in your combination. It sounds like you are not
2 willing to do that today. Are you willing to do
3 that today?

4 MR. STAVINOHHA: Objection, form.

5 Q. (BY MR. KANTAREK) So Mr. Williams, are
6 you willing to do that today or are you trying to
7 determine what it is right now?

8 MR. STAVINOHHA: So using Figure 3,
9 which is a window of Figure 2, reading Figure 3,
10 I haven't done the mapping. I didn't feel it was
11 necessary within the Declaration.

12 However, sitting here today reading the
13 individual elements of that Figure 3, it
14 describes the individual fields of the module
15 are, and this starts in Column 6, Line 34: The
16 module page and position indicator, the module
17 name, caller name, receiving/emergency call
18 indicator, console transmit indicator, busy
19 indicator, encrypted call indicator, patch call
20 designator, simulselect designator and volume
21 indicator," like I said, I haven't done those
22 mapping, but I would, as a POSITA, I would say at
23 a minimum the caller name would come through on
24 the working channel, and possibly some of the
25 other ones, just depending on the design choices

1 made in the implementation of the combination.

2 Q. So maybe you weren't understanding my
3 question. So Figure 3, so in the combination of
4 EDACS and Downs that you propose, the control
5 channel with the alert from EDACS would come in
6 on one of communication module windows A1 through
7 A14; is that right?

8 MR. STAVINOHHA: Objection, form.

9 A. The windows in Figure 2 is A2, right?

10 Q. (BY MR. KANTAREK) That's correct.

11 A. And so Figure 3 is about that example A2
12 window.

13 Q. Right.

14 A. And what I just described is about how I
15 viewed different elements around the working and
16 control channels would manifest themselves on
17 that A2 display.

18 Q. So your position is that -- I'm just
19 trying to understand your position. Is your
20 position that a control channel would be its own
21 communication module window and the working
22 channel would be a separate communication module
23 window?

24 A. They are working together to disclose
25 the emergency and the details of the emergency.

1 Q. So again my question, if you look at
2 Figure 2, you have module windows A1 through A14,
3 right?

4 A. There's --

5 Q. It's a simple question.

6 A. There's those windows.

7 Q. You can just say yes when I asked you if
8 A1 through A14 are communication module windows.

9 A. Yes.

10 Q. Thank you. If you're looking at that,
11 one of the communication module windows would
12 show control -- the control channel, right, in
13 your combination.

14 A. One of the fields within that window
15 would show information that is gleaned from,
16 taken from the control channel.

17 Other fields within that window would
18 take information from the working channel, but
19 they are both coupled together, just having
20 knowledge about an emergency -- without the name,
21 for example, is pointless, and having just
22 information about the name and not -- no
23 indication of an emergency is probably defeating
24 the purpose to begin with, so they have to --

25 Q. Sure.

1 A. They work together.

2 Q. So your -- in your combination, one
3 communication module window would show both the
4 control channel and the subsequently assigned
5 working channel once an emergency alert was
6 received on that channel?

7 A. It could.

8 Q. It could or it would?

9 A. It could. I think Figure 3 is an
10 example, so there might be other windows that --

11 Q. Mr. Williams, I'm asking about your
12 combination. You are opining that the console of
13 Downs would take the working channel and the
14 control channel of EDACS and monitor it at this
15 console.

16 So it sounds like your testimony is one
17 individual communication module window would show
18 information from the B control channel and a
19 subsequently assigned working channel. Is that
20 your idea of the combination?

21 A. It could be, yes.

22 Q. Would you say it would be?

23 A. I would say it could be. As an example,
24 I would have to go back and look at every
25 permutation, but in my opinion it certainly

1 supports that capability.

2 Q. Got it, and that's despite the fact that
3 in Paragraph 151, you wrote down, it says, this
4 is the last sentence: "These communication
5 modules thus 'provide call access to entities'
6 such as "an individual trunked radio unit, a
7 radio talk group, or a conventional radio' via
8 voice and associated data signals (media streams)
9 and are 'programmed by the dispatcher to
10 represent a particular group, unit, console,
11 channel, line, etc., that is available to the
12 console.'"

13 So despite that disclosure of
14 communication module windows representing a
15 particular channel, it's your testimony that in
16 your combination, one communication module window
17 would represent the overall control channel and a
18 subsequently assigned working channel?

19 MR. STAVINOKA: Objection, form.

20 A. It could, because that sentence
21 programmed by the dispatcher to represent a
22 particular group, unit, console, channel, line,
23 etc., that is a broad statement indicating
24 flexibility for all sorts of configurations.

25 Q. (BY MR. KANTAREK) Got it. Okay, so

1 let's move on to 1B which starts on Page 96,
2 Paragraph 154 you said, and do you see, this is
3 in your Declaration, are you with me, it says in
4 Paragraph 154, "To the extent 'receiving an alert
5 in one of the media streams' is construed to
6 require the alert and media stream be received on
7 the same channel, it is rendered obvious by
8 Ground 2." Do you see that?

9 A. Yes.

10 Q. So Ground 1 does not render this
11 obvious, if construed to require the alert and
12 media stream be received on the same channel,
13 right?

14 A. I'm sorry, repeat that question again.

15 Q. So Ground 1 does not render this
16 obvious, if construed to require the alert and
17 media stream be received on the same channel,
18 right?

19 A. I think that's a fair statement.

20 Q. All right, and so we just talked
21 about -- so in EDACS, the alert and the media
22 stream are not received on the same channel,
23 right?

24 A. The alert is on the control channel,
25 which is part of the media stream.

1 Q. Maybe if you could just listen to my
2 question and answer it. In EDACS the alert and
3 media stream are not received on the same
4 channel, right?

5 MR. STAVINOHHA: Objection, form.

6 Q. (BY MR. KANTAREK) In Paragraph 154 you
7 say, "To the extent 'receiving an alert in one of
8 the media streams' is construed to require the
9 alert and media stream be received on the same
10 channel, it is rendered obvious by Ground 2," not
11 Ground 1, which we just discussed.

12 So my concern is the alert and the media
13 stream you identified on EDACS, so it would
14 follow to me that the alert and media stream in
15 EDACS are not received on the same channel. Is
16 that what you're saying?

17 A. This phrasing, I don't -- I would phrase
18 this differently because the construction of
19 media stream is voice, excuse me, audio and/or
20 video and/or both that may include associated
21 data streams. Under that construction, the
22 control channel and working channel would be the
23 media stream.

24 So this phrasing is, I would phrase it
25 differently because I don't think this is the

1 right way to phrase it.

2 Q. So are you changing your opinion in
3 Paragraph 134?

4 A. No. I'm just saying that I would -- the
5 phrasing would be different. To the extent that
6 all of the information including the audio as
7 well as the alert needs to be on the same
8 channel, it would be rendered obvious by Ground
9 2.

10 Q. Not Ground 1, right?

11 A. I think that's right.

12 Q. So that's because in EDACS, the
13 disclosure you identified as the claimed alert is
14 not received on the same channel as what you
15 describe as a media stream, right?

16 MR. STAVINOHHA: Objection, form.

17 A. I would have rephrased this if I had
18 caught it to say it construed to require the
19 alert and audio and/or video or both be received
20 on the same channel.

21 Q. (BY MR. KANTAREK) Well, if you go to
22 Page --

23 A. I think when I wrote this, I was
24 thinking media for the final claim construction.

25 Q. Mr. Williams, I was in the middle of a

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1 question. I assume we'll tease that out.

2 I'm taking you to Page 45 of your
3 Declaration. I would suggest holding the page
4 that you were on open.

5 Here you say on the bottom of Page 45
6 you have termed media streams as, "A continuous
7 sequence of audio or audio-and-video, continuous
8 which may include associated data through a
9 network," do you see that?

10 A. Correct.

11 Q. And here up in Paragraph 58 you've said:
12 "I have considered both party's constructions,
13 and my conclusions would not change under either
14 party's proposal." Right?

15 A. Correct.

16 Q. So this says a sequence of audio or
17 audio and video, right?

18 A. Right.

19 Q. So it seems like you already considered
20 what you're suggesting made you change your
21 opinion in 154; is that right?

22 MR. STAVINOH: Object to form.

23 A. I didn't change my opinion. I clarified
24 my opinion, because that phrasing was -- I would
25 have done it differently.

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1 Q. (BY MR. KANTAREK) Well, you did write
2 this Declaration, right?

3 A. I know, but sometimes typos happen.

4 Q. (BY MR. KANTAREK) So this is a typo on
5 154?

6 A. Yeah, I think so.

7 Q. Okay. So what should 154 say?

8 A. The extent -- let's see. It is
9 construed to require the alert and audio or video
10 and/or both be received on the same channel.

11 Q. Okay. So you're not changing it at all,
12 except you're substituting the construction of
13 media stream into 154, right?

14 A. I'm clarifying it, yes.

15 Q. Okay, I understand. So if you go to
16 Page -- oh, we're already on Page 96 -- if you go
17 to Paragraph 155 which is the next paragraph, you
18 say: "Downs in view of the EDACS Standard
19 discloses receiving an alert [e.g., Group
20 Emergency Call Type] in one of the media streams
21 [e.g., talk group, voice and associated data
22 signals sent via the control channel and working
23 channels]." Right?

24 A. Right.

25 Q. And so you identify here the alert as a

1 group emergency call type, right?

2 A. Right.

3 Q. And the media stream as talk group,
4 voice and associated data signals sent via the
5 control channel and working channels, right?

6 A. Right.

7 Q. So your opinion is the media stream is
8 talk group, voice and associated data signals
9 sent via at least three channels?

10 MR. STAVINOHHA: Objection, form.

11 A. What was that last part?

12 Q. (BY MR. KANTAREK) Your opinion is the
13 media stream is talk group, voice and associated
14 data signals sent via at least three channels?

15 MR. STAVINOHHA: Objection, form.

16 A. I say sent via the control channel and
17 working channels.

18 Q. (BY MR. KANTAREK) So control channel is
19 one channel, right?

20 A. Yeah.

21 Q. And working channels is at least two
22 more channels, right?

23 A. Oh, I see what you're saying. No,
24 that's -- I think that was meant to be plural of
25 a single control channel and a single working

1 channel, as opposed to one and two -- two working
2 channels. I see what you're saying.

3 Q. Okay, so your opinion is just that media
4 stream is talk group, voice and associated data
5 signals sent via two different channels?

6 A. In the Downs and EDACS combination, yes.

7 Q. So the control channel I think we've
8 talked about this a little bit, the control
9 channel EDACS, could you pull up EDACS at Page
10 50, please.

11 A. Page 50 or 58?

12 Q. Of 50.

13 A. Okay.

14 Q. Here is the definition of control
15 channel, right?

16 A. Right.

17 Q. And so this says: "The repeater channel
18 on which system control information is
19 continually transmitted and channel
20 request/status information is received from the
21 field radio units," right?

22 A. Right.

23 Q. So system control information, that's
24 not audio, right?

25 A. It can include audio.

1 Q. What audio?

2 A. To put it differently, it doesn't
3 necessarily have to exclude audio.

4 Q. So what audio is transmitted on the
5 control channel of EDACS, the control?

6 A. I'd have to go back through this to see
7 if it even mentions it, but more broadly there's
8 no limitation in my POSITA viewpoint or
9 restriction about what can or cannot be included
10 on a control channel.

11 So you asked could audio be on a control
12 channel. The answer is yes.

13 Q. So if audio can be transmitted on a
14 control channel, why does EDACS switch emergency
15 alerts to working channels?

16 A. Well, the control channel is about
17 providing information about the coming
18 information, audio or video or what have you, on
19 the working channel.

20 It's -- so working channel will have,
21 you know, the entire conversation, transmission,
22 depending. That could be of any number --
23 length.

24 The control channel is to provide
25 information about what that is coming, what is

1 coming, the number of bits, or what have you.
2 The audio can be part of that. I'm not saying
3 necessarily it has to be, but it can be part of
4 that. There's -- as long as it helped -- in
5 general, if it helps provide the system with some
6 operating parameters about what is to come on the
7 operating channel, it can be included on the
8 control channel, and thus, audio can be part of
9 that.

10 Q. That's the system control information
11 you're talking about?

12 A. Yes.

13 Q. And so in your view EDACS discloses a
14 media stream on a control channel that switches
15 to a working channel, right?

16 MR. STAVINOHHA: Objection, form.

17 A. No, they both are used together. Your
18 original question was can a control, at least I
19 interpreted it this way, can a control channel
20 include audio. We're not including audio.

21 And I said, "Yes, it can in general."
22 In terms of how EDACS works in the -- typically
23 in the Downs combination, is that both the
24 information on the control channel and the
25 working channel together form the media stream

1 for the claim.

2 Q. So in your opinion the media stream in
3 EDACS bridges two channels, right?

4 MR. STAVINOH: Objection, form.

5 A. It utilizes a control channel and a
6 working channel.

7 Q. (BY MR. KANTAREK) If you -- so if you
8 go to Exhibit EDACS Page 57 of Exhibit 1005, it
9 defines working channel there, right?

10 A. Right.

11 Q. It says: "All repeater channels except
12 the single control channel operate as working
13 channels. Radios intercommunicate, either
14 encryption, mutual aid, analog voice, digital
15 voice or digital data, through a working
16 channel." Right?

17 A. Right.

18 Q. And that's sort of -- sorry, strike
19 that. The definition of control channel that we
20 just looked at on Page 50 talks about system
21 control information being transmitted, right?

22 A. Right.

23 Q. And on the other hand the working
24 channel talks about radios intercommunicate,
25 either encryption, mutual aid, analog voice,

1 digital voice or digital data, through a working
2 channel, right?

3 A. Right.

4 Q. It doesn't say in control channel that
5 radios -- it doesn't say digital voice, digital
6 data, or anything like that as communicated
7 through a control channel, right?

8 MR. STAVINOH: Objection, form.

9 A. Right, there's no restriction, so that's
10 consistent with my view that really all sorts of
11 different information, including audio, could be
12 a part of the control channel information.

13 Q. (BY MR. KANTAREK) If you'll look at,
14 yeah, if you'll look at your -- I'm sorry. Give
15 me one moment. If you go to Page 98 of your
16 Declaration, it says at the top of Figure 9 it
17 says: "All active radios monitor the control
18 channels," right?

19 A. Correct.

20 Q. And that control channel continuously
21 transmits 9600 baud data, right?

22 A. Yes, that's per second.

23 Q. Baud?

24 A. Baud, b-a-u-d. You are not old enough
25 to remember that.

1 Q. So the radio transmits a request for an
2 emergency group call on the inbound control
3 channel is what you say here, right?

4 A. I think that's fair.

5 Q. And in EDACS at Page 20 -- sorry, on
6 EDACS Page 28, it says: "The control channel
7 continually transmits assignment information
8 allowing a user to join calls in progress after
9 the group has been assigned a working channel."
10 Right?

11 A. Right.

12 Q. So the alert's received on a control
13 channel, right?

14 A. The group emergency call type is on the
15 control channel.

16 Q. And once members are notified of that
17 they begin communicating on the working channel,
18 right?

19 A. I think that's fair.

20 Q. Not the control channel, right?

21 A. I think that's true.

22 Q. Because they can't communicate on the
23 control channel, right?

24 A. They can join on the working channel.

25 Q. I'm sorry, my question is they can't

1 communicate on the control channel, right?

2 A. That's kind of an absolute global
3 statement that I am not comfortable in agreeing
4 to, because I haven't thought through all the
5 different possibilities, including fringe stuff.

6 Q. So they don't communicate on the control
7 channel, is all you're willing to admit, right?

8 A. The idea is that they communicate on the
9 working channel.

10 Q. All right. I think we can take a lunch
11 break if that works for you.

12 (Noon recess taken.)

13 Q. (BY MR. KANTAREK) Mr. Williams, did you
14 talk to anyone on your break?

15 A. Yep.

16 Q. Oh, all right. Before we took a break
17 we were talking about EDACS emergency group call
18 requests.

19 A. Right.

20 Q. Do you still have that open, Page 25?

21 A. Okay.

22 Q. So looking at 4.5.2.1.2, there is an
23 emergency call request and an emergency call,
24 right?

25 A. Both of those terms are used there, yes.

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1 Q. So the request is different than the
2 call itself, right?

3 A. The request comes from the call.
4 Without the call, there's no request.

5 Q. So let's look at the text. It says:
6 "An emergency call is initiated by pressing the
7 emergency button on the radio."

8 A. Right.

9 Q. "Once initiated, the radio immediately
10 transmits the emergency call request on the
11 inbound control channel." Do you see that?

12 A. Yes.

13 Q. So pressing the button just itself is
14 not an emergency call, right? It just initiates
15 an emergency call?

16 MR. STAVINOHHA: Objection, form.

17 A. It's a process, and it has to be
18 initiated by pressing the emergency button, and
19 then it goes to the next step in the process,
20 which is transmitting the emergency call request
21 in the form of a group emergency call type.

22 Q. (BY MR. KANTAREK) And then the next
23 step after that is, "The system receives the
24 request and assigns the emergency call to a free
25 channel," right? That's a working channel?

1 A. Correct.

2 Q. So before it's assigned to a free
3 channel, the radio transmits a request on the
4 control channel, right?

5 A. That's fair.

6 Q. And if you look back on Page 23 of the
7 EDACS, at the bottom, 4.4, it says, "Call
8 definition." Do you see that?

9 A. Yes.

10 Q. "When a call is placed on the system, it
11 consist of two parts, the communication mode and
12 the call type. The system supports three
13 communication modes and four call types." And
14 then Table 1 is shown here with communication
15 modes and the four call types, right?

16 A. Right.

17 Q. And this is a call definition, right?

18 A. This is showing the relationship between
19 call type and mode.

20 Q. It is within the call a definition
21 inspection, right?

22 A. Correct.

23 Q. It doesn't say request definition, does
24 it?

25 A. It doesn't use that word, no.

1 Q. Okay. And then on Page 25 it says
2 emergency call request, on the one hand, and
3 emergency call on the other, right?

4 A. Yes.

5 Q. If we could go to your Declaration at
6 Page 99, please.

7 A. Are we coming back here?

8 Q. I think Downs and EDACS, if you can keep
9 them handy. We're going to be using your
10 Declaration, Downs and EDACS for the most part in
11 this part?

12 A. Okay.

13 Q. So looking at Paragraph 160 this is
14 regarding the claim element 1C, "elevating a
15 priority associated with the media stream
16 receiving the alert, such that an adjustment is
17 made to how the media stream is provisioned to an
18 endpoint in the communication environment." Do
19 you see that?

20 A. Yes.

21 Q. So the media stream receiving the alert,
22 you understand that's the same media stream that
23 we just discussed in Element 1B, right?

24 A. Yes.

25 Q. And again for this media stream you

1 identified the control channel and working
2 channel -- I'm sorry, strike that. For this
3 media stream you identified the top group, voice
4 and associated data signals sent via the control
5 channel and working channels, right?

6 A. Correct. I think it said audio instead
7 of voice, but yes.

8 Q. If you look at Page -- if you go back to
9 Page 96 of your Declaration, Paragraph 155, it
10 says: "in one of the media streams [e.g., talk
11 group voice and associated data signals sent via
12 the control channel and working channels],"
13 right?

14 A. Yes.

15 Q. So in Paragraph 161 that's on Page 100
16 it says: "Upon receiving an emergency call
17 request (alert), the EDACS Standard specifies
18 that 'the system automatically assigns the
19 highest priority to the talk group['s]' signals
20 (media stream receiving the alert)." Do you see
21 that?

22 A. Yes.

23 Q. And the talk group only sends signals on
24 the working channel, right?

25 MR. STAVINOH: Objection, form.

1 A. Which is part of the media stream, yes.

2 Q. (BY MR. KANTAREK) I'm sorry, my
3 question was the talk group only sends signals on
4 the working channel, right?

5 A. Right.

6 MR. STAVINOHA: Objection, form.

7 Q. (BY MR. KANTAREK) Now if you will look
8 at EDACS Page 52, this is Exhibit 1005, which is
9 the talk group you're talking about, right? I'm
10 sorry on Page 52, this is part of the glossary.

11 A. Right.

12 Q. Down along the left side is the talk
13 group you're referencing in the EDACS book in
14 Paragraph 161 of your Declaration, right?

15 A. Yes.

16 Q. So in your Declaration -- so this
17 Element 1C, we kind of -- there's a comma in
18 there, so I'm going to specifically talk about
19 the part after the comma which is, "such that an
20 adjustment is made to how the media stream is
21 provisioned to an endpoint in the communication."

22 A. Right, if you want to call that C prime,
23 if you are going to use that a lot.

24 Q. Perfect that sounds like a great naming
25 convention. If you look at Page 99 in Paragraph

1 160 you say, starting with C prime, you say,
2 "such that an adjustment is made to how the media
3 stream is provisioned," you say, "e.g., in
4 response to the emergency call request in the
5 combined Downs-EDACS system, broadcasting at a
6 louder volume, or changing speaker location." Do
7 you see that?

8 A. Yes.

9 Q. So what you contend are the claimed
10 adjustments made are broadcasting at a louder
11 volume or changing speaker location, right?

12 A. Correct.

13 Q. And if you go to Paragraph 163 which is
14 on Page 101 you expound on this a little bit.
15 You say: "Downs discloses that adjustments be
16 made to the volume at which the audio from
17 communication modules assigned to the talk
18 group's signals (media streams) receiving
19 emergency call requests (alerts) is provisioned,
20 such that 'emergency calls are broadcast louder
21 from the dispatcher speakers than other calls'
22 based on a pre-set emergency volume level." Do
23 you see that?

24 A. Yes.

25 Q. Volume adjustment is done at the

1 dispatcher console, right?

2 A. For the dispatcher speakers, yes.

3 Q. And this console as we talked about
4 before is, you consider it the claimed endpoint
5 in the communications environment, right?

6 A. It can be an endpoint.

7 Q. Well, yeah, and at the end of Paragraph
8 163, you say: "used at the dispatcher console
9 (endpoint in the communication environment)." Do
10 you see that?

11 A. Yes.

12 Q. So that's what you identify as an
13 endpoint in your Declaration, right?

14 A. For that passage, yes.

15 Q. And then if you look at Page 164 of your
16 Declaration, which is on the next page, it says:
17 "These 'volume settings 86,' are 'set such that
18 emergency calls are broadcast louder from the
19 dispatcher speakers than other calls,' and are
20 one example of options set by the dispatcher and
21 saved in a 'dispatcher profile,' shown in Figure
22 4." Do you see that?

23 A. Yes.

24 Q. The volume settings and the dispatcher
25 profile are preset levels, correct?

1 A. Yes.

2 Q. These are preset in+ the dispatcher
3 control level at the console?

4 A. They can be preset.

5 Q. Well, it says in 163 you say that it
6 says volume adjustment is based on a preset
7 emergency volume level in the 5th line down,
8 right?

9 A. Right.

10 Q. You don't identify another way to set
11 the volume for emergency calls in Downs, right?

12 A. I don't identify specifically. A POSITA
13 would realize that when you have a system like
14 this, you know, you can have -- you can come with
15 a default setting or it could come with a null
16 setting or it could come at a preset setting like
17 a 5 out of 10 kind of thing.

18 Q. And so where is that in your
19 Declaration?

20 A. That's not in my Declaration, but it was
21 responding to your question.

22 Q. Okay. And these default settings or
23 null settings these would all be at the
24 dispatcher console, right?

25 A. In this context, yes.

1 MR. STAVINOHHA: Object to form.

2 Q. (BY MR. KANTAREK) So these preset
3 levels, so if you go to -- I'm sorry, strike
4 that.

5 If you go to Page 103, Paragraph 165, it
6 says, "In addition to presetting emergency volume
7 levels, Downs also enables dispatchers to
8 manually adjust how a communication module
9 assigned to the talk group signals media stream
10 is provisioned." Do you see that?

11 A. Yes.

12 Q. Manual adjustment by dispatchers happens
13 at the console, right?

14 A. I believe so.

15 Q. Manual adjustment of the dispatcher's
16 own speakers doesn't affect how the talk group
17 signals are received by other parties on a
18 channel, right?

19 MR. STAVINOHHA: Objection, form.

20 A. I don't recall if Downs provides for
21 that capability. In general, I'd say it's
22 possible, but frankly, I don't know for certain
23 if it's only -- if what you said is absolutely
24 true or not.

25 Q. (BY MR. KANTAREK) Well, I'm saying a

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1 dispatcher at its console in Downs, manually
2 adjusting the volume of a channel, that doesn't
3 affect how other people on that channel receive
4 talk group signals, right?

5 A. Like, same answer, maybe I can do it
6 better, it may. I just don't recall for certain
7 as to -- I mean it certainly would -- the
8 dispatcher certainly would control its own
9 volume. What I'm not certain of without going
10 back through it is if there is also an embodiment
11 where the dispatcher could essentially turn up
12 the base volume going to everybody in the talk
13 group. I just don't remember.

14 Q. All right. So absent such an
15 embodiment -- well, strike that. You don't
16 reference any embodiment like that in this
17 portion of your Declaration, right?

18 A. Let me look at the part --

19 Q. Sure, it starts at Paragraph 160, and
20 goes to 166, as far as I can tell. And so I'll
21 just ask the question again so we have it while
22 you're looking, you don't reference any
23 embodiment where a dispatcher could turn up the
24 base volume going out to the talk group in
25 Paragraphs 160 through 166 of your Declaration,

1 right?

2 A. Yeah. I'm looking at the reference on
3 the bottom one, 165, Column 8, 40 through 48 and
4 it says the dispatcher, starting on Line 44, "the
5 dispatcher can adjust its volume via volume keys
6 118, mute the module, highlight the module for
7 the select speaker (may be headset), modify the
8 module, or establish (or clear) an emergency
9 condition for the module." That doesn't in my
10 view preclude the possibility of the dispatcher
11 modifying the volume heard by the talk group.
12 It's not specific.

13 Q. So it's your opinion that that disposes
14 the dispatcher, or it could dispose the
15 dispatcher controlling other endpoints on the
16 channel?

17 MR. STAVINOKA: Objection, form.

18 A. It doesn't exclude it, and the way it's
19 phrased it -- you know, it could include it.
20 It's just not specific.

21 Q. (BY MR. KANTAREK) So these presets in
22 Figure 4 of Downs about emergency volume, these
23 presets go into effect once the emergency button
24 of Downs is pushed, right?

25 A. I think that's right.

1 Q. So adjustments made based on the --
2 adjustments made -- I'm sorry, strike that.

3 The adjustments to volume discussed here
4 in your Declaration happen after a dispatcher
5 presses an emergency button on its console?

6 MR. STAVINOH: Objection, form.

7 A. I think that's fair.

8 Q. (BY MR. KANTAREK) And if you go to --
9 so let's move on to Claim 3 which is on Page 106
10 of your Declaration. Actually, I'm not going to
11 take you there.

12 I'm going to introduce an exhibit if I
13 can find Exhibit Share. I'm actually not going
14 to introduce an exhibit. I'm just going to take
15 you to Page 45 of your Declaration.

16 A. Going backwards.

17 Q. Much easier. We talked about this a
18 little bit. This is your Claim Construction of
19 Terms in the Challenged Claims section.

20 A. Yes.

21 Q. And if you look at the next page and you
22 look at, "Order of steps," second from the bottom
23 in the table.

24 A. Yes.

25 Q. In the column entitled, "Petitioner

1 Proposal," which is you/Motorola it says, "The
2 steps must be performed in the recited order."
3 Do you see that?

4 A. Yes.

5 Q. And I'm sorry, just for completeness you
6 state in Paragraph 58 that you have considered
7 both party's instructions and your conclusions
8 would not change under either party's proposal,
9 right?

10 A. Correct.

11 Q. So looking at Claim 1, which we can find
12 on Page 40 of your Declaration --

13 A. Page 40, yeah.

14 Q. -- it says Claim Element, Claim
15 Language, so Claim Element A, which is monitoring
16 media streams associated with channels in a
17 communication environment, that has to happen
18 before 1B, right?

19 A. I'm sorry? Repeat that.

20 Q. Sure. So Element 1A which states,
21 "Monitoring media streams associated with
22 channels in a communication environment, based on
23 your order of steps, being that this has to
24 happen in a recited order, Element 1A has to
25 happen before Element 1B, right?

1 A. Right, or generically, monitoring
2 happens before receiving.

3 Q. Sure, and that was going to be my next
4 question, and the same thing is true with Element
5 1B, "receiving an alert in one of the media
6 streams has to happen before the 1C step, which
7 is the elevating step," right?

8 A. Correct.

9 (Exhibit 1008 was marked by the
10 reporter for identification.)

11 Q. (BY MR. KANTAREK) Why don't we turn to
12 Kim, which is 1008. All right, Kim is Exhibit
13 1008, right?

14 A. Yes.

15 Q. It's at the bottom.

16 A. Yes.

17 Q. This is PCT W02004/034350, right?

18 A. Correct.

19 Q. And the inventor is Kim, so you'll
20 understand what I'm referring to if I say Kim,
21 right?

22 A. Yes.

23 Q. So if you go to your Declaration at Page
24 148, please let me know when you're there?

25 A. I'm there.

1 Q. So on Page 148 this discusses Element
2 1B, receiving an alert in one of the media
3 streams?

4 A. Yes.

5 Q. So in Paragraph 265 it says, "Kim
6 discloses 'receiving an alert [e.g.,
7 emergency-warning broadcast start code] in one of
8 the media streams [e.g., the television broadcast
9 signal associated with channel 'r' or 's'].'"
10 Right?

11 A. Yes.

12 Q. So the claimed alert that you have
13 identified in Kim is the emergency warning
14 broadcast start code, right?

15 A. Correct.

16 Q. And then the media stream that you have
17 identified is the television broadcast signal
18 associated with Channel r or s, right?

19 A. Right.

20 Q. And if you go to Paragraph 266, the
21 second sentence you say: "This emergency-warning
22 broadcast signal (alert) is one component of the
23 'digital broadcast signal, which is composed of
24 data streams.'" Do you see that?

25 A. Yes.

1 Q. I'm sorry, so is the emergency warning
2 broadcast signal the alert, or is it the
3 emergency warning broadcast start code?

4 A. I'm sorry, repeat that.

5 Q. Is the emergency warning broadcast
6 signal the claimed alert, or is the emergency
7 warning broadcast start code the claimed alert?

8 MR. STAVINOHHA: Objection, form.

9 A. The emergency warning broadcast start
10 code, which is the alert, and that's part of the
11 emergency warning broadcast signal.

12 Q. (BY MR. KANTAREK) Got it. So the alert
13 is the emergency warning broadcast start code?

14 A. Which is part of the signal.

15 Q. Got it. This emergency warning
16 broadcast signal, this is pre-determined code
17 sent to Kim's television, right?

18 MR. STAVINOHHA: Objection, form.

19 A. It's a signal sent to the television
20 consisting of various codes.

21 Q. Well, if you look at Paragraph 266, the
22 fourth line down you say, "This 'digital
23 broadcast data [media stream] is composed of
24 video data, audio data, and auxiliary data (i.e.,
25 emergency-warning broadcast data)' to which a

1 'predetermined code,' is added in predetermined
2 units." Do you see that?

3 A. Yes.

4 Q. So the emergency warning broadcast start
5 code is a pre-determined code, right?

6 A. It's a pre-determined code.

7 Q. So if you go to -- now we're going to
8 move to 1C, so taking you to Page 149 of your
9 Declaration, this is Paragraph 268, you talk
10 about Element 1C and 1C Prime, right?

11 A. Correct.

12 Q. So in here you say, starting the second
13 line down just so we're talking about C Prime,
14 "such that an adjustment is made to how the media
15 stream is provisioned [e.g., adjusting volume of
16 the media stream relative to other broadcast data
17 via audio signal processor 40 or controlling
18 power supply unit 75] to an endpoint in the
19 communication environment [e.g., the viewer's
20 television]." Right?

21 A. Correct.

22 Q. Okay. So in Kim the claimed endpoint is
23 the viewer's television, right?

24 A. Correct.

25 Q. And the viewer's television, if you go

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1 to paragraph -- or it's the same paragraph, it
2 just includes the figure on the next page, on
3 Page 150. This is Figure 5; do you see that?

4 A. Yes.

5 Q. Figure 5 includes controller 70 in the
6 middle there; do you see that?

7 A. Yes.

8 Q. Controller 70 is at the T.V. of Kim,
9 right?

10 A. Yes.

11 Q. And in Paragraph 269 you state that,
12 "Kim teaches that controller 70 makes an
13 adjustment to how the media stream is provisioned
14 to an endpoint in the communication environment."
15 Do you see that?

16 A. Yes.

17 Q. So I'm a little confused because in 268
18 you said the adjustment was adjusting volume of
19 the media stream relative to the broadcast data
20 via audio signal processor 40 or controlling
21 power supply unit 75, but in 269 you say
22 controller 70 is what makes an adjustment to how
23 the media stream is provisioned to an endpoint.
24 So which one are you identifying as making
25 adjustments to how the media stream is

1 provisioned to an endpoint?

2 MR. STAVINOHHA: Object to form.

3 A. It's a process. The controller makes
4 the decision, and then it uses either the volume
5 control, or excuse me, the audio signal processor
6 or the power supply unit to actually make that
7 action happen, whether that is change the volume
8 or turn on the T.V.

9 Q. (BY MR. KANTAREK) I see. So controller
10 70 controls the action, but it uses the audio
11 signal processor 40 or power supply unit 75 to do
12 that, right?

13 A. Right.

14 Q. And audio signal processor 40 in
15 controlling -- or strike that.

16 Audio signal processor 40 and power
17 supply unit 75 are both part of the T.V. of Kim,
18 right?

19 MR. STAVINOHHA: Objection, form.

20 A. Part of the what of Kim? I didn't hear
21 that.

22 Q. (BY MR. KANTAREK) The T.V.

23 A. Oh, the T.V. I believe that's right.

24 Q. So adjustments made by controller 70 are
25 made at the claimed endpoint; is that right?

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1 A. As part of the process after receiving
2 the emergency broadcast signal code.

3 Q. So adjustments are made by controller 70
4 at what you identify as the claimed endpoint,
5 right?

6 A. I think that's fair. It implements the
7 emergency broadcast code that has been sent.

8 Q. So does controller 70 affect the
9 television broadcast signal associated with
10 Channel r or s?

11 MR. STAVINOHA: Objection, form.

12 A. The signal comes in over the air, and
13 then into what's called broadcast signal
14 receivers. It's then sent to the controller to
15 do a variety of things. Part of that includes
16 feedback to the receivers, who are then sending
17 on, for example, to the audio signal processor so
18 I guess it depends on how you --

19 Q. (BY MR. KANTAREK) I understand.

20 A. -- view that question, so to speak.

21 Q. Sorry, so let me change it a little bit.
22 When -- after the first and second broadcast
23 signal receivers of the television of Kim
24 received television broadcast signals, the
25 controller doesn't change those signals, right?

1 MR. STAVINOHHA: Objection, form.

2 A. I guess to be precise, the controller
3 doesn't change the fields that are on the --
4 described in Figure 1. It just uses them or
5 implements what needs to be implemented
6 associated with the particular setting.

7 Q. (BY MR. KANTAREK) So if you look at
8 Figure 5 in your Declaration, the originating
9 broadcast signal comes from the antenna into the
10 first and second broadcast signal receivers, 10
11 and 15, right?

12 A. Correct.

13 Q. And the signal that comes into each of
14 the first and second broadcast signal receivers
15 are the same, right?

16 MR. STAVINOHHA: Objection, form.

17 A. The signals are the same. They are
18 being tuned to two different channels in the
19 receiver, r and s.

20 Q. (BY MR. KANTAREK) Right. So I just
21 mean the signal that comes through the antenna
22 that goes to first broadcast signal receiver is
23 the same signal that goes to the second broadcast
24 signal receiver, right? It's just split?

25 A. I think that's fair.

1 Q. If you look at Kim -- and I'm sorry, the
2 broadcast signal -- so the broadcast signal
3 received through the antenna and sent through the
4 signal receivers is a pre-determined signal,
5 right?

6 A. I'm not sure about pre-determined in
7 this context. Maybe an analogy is you have your
8 radio, you're essentially receiving all of these
9 FM stations but depending on what particular
10 channel your receiver is tuned on, you only hear
11 a portion of that signal, the one for that
12 channel.

13 Q. Got it. So this broadcast signal goes
14 into the first and second broadcast signal
15 receivers, regardless of whether it includes an
16 emergency warning broadcast start code, right?

17 A. It goes in. That doesn't mean the
18 receiver will be tuned to be able to process it.

19 Q. And so but Kim itself doesn't add
20 emergency warning broadcast start code to the
21 broadcast signal, right?

22 A. Right.

23 Q. I'm sorry, Kim's television doesn't add
24 an emergency warning start code to the broadcast
25 signal, right?

1 A. Correct.

2 Q. And if you look at -- strike that. So
3 when Kim's television receives broadcast signals
4 of emergency warning broadcast start codes, the
5 television compares that information to
6 information stored in its memory, right?

7 A. Where are you reading from?

8 Q. It's Page 26, end of Page 26 of Kim to
9 the end of Page 27 of Kim, so it's a little bit
10 broad. I just mean broadly speaking.

11 A. The broad questions are kind of
12 tricky --

13 Q. Sure.

14 A. -- when you get -- the Devil is in the
15 details.

16 Q. Right.

17 A. I'm at the end of Page 26 on Kim.

18 Q. Yeah, so the end of Page 26 at Line 24
19 says, "The controller 280 determines whether a
20 difference between emergency-warning broadcast 26
21 transmission time information and TV system's RTC
22 information is in the range of a predetermined
23 allowable error at step 3. If it is determined
24 that the difference between the emergency-warning
25 broadcast transmission time information and the

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1 TV system's information is in the range of the
2 predetermined allowable error at step 3, the
3 controller 280 determines whether the received
4 emergency-warning broadcast reception area
5 information contains specific information equal
6 to area information registered in the memory at
7 step 4." Do you see that?

8 A. Yes.

9 Q. So what I'm asking is Kim's T.V.
10 receives a broadcast signal, and if it has an
11 emergency warning broadcast start code, it
12 compares that to information stored in its memory
13 to determine what to do, right?

14 A. I think generally that's fair, but to
15 be -- again, the Devil is in the details, the
16 controller determines whether they received
17 emergency warning broadcast reception area and
18 that information contains specific information
19 equal to the error information registered in the
20 memory at Step 4.

21 Q. So if you go to Paragraph 268, well, we
22 can stick at Paragraph 268 of your Declaration it
23 says -- strike that. Let's go to Paragraph 270
24 of your Declaration. This is on Page 150. You
25 talk about adjustments made by Kim's controller

1 70, right?

2 A. Specifically controller 70 determines
3 which of these adjustments are needed to be made
4 based on the flowchart shown in Figure 3 below.

5 Q. Right so the next sentence says, "For
6 example, controller 70 could adjust and elevate
7 the priority of the media stream receiving the
8 alert by 'power[ing] the TV system on,
9 convert[ing] a system operation mode into a TV
10 viewing mode, and control[ing] the TV system to
11 output broadcast data of the prescribed
12 emergency-warning broadcast channel in the form
13 of AV data.' Additionally, the controller could
14 'outputs a volume control signal to increase a
15 volume level of the TV system.'" Do you see
16 that?

17 A. Yes.

18 Q. So you discuss four different
19 adjustments in there, right, one, powering a T.V.
20 system on, two, converting a system operation
21 mode into a T.V. viewing mode, three, controlling
22 the T.V. system's output broadcast data of the
23 prescribed emergency warning broadcast channel in
24 the form of AV data, and 4, outputting a volume
25 control signal to increase the volume level

1 control of the T.V. system, right?

2 A. Correct.

3 Q. Now controller 70 controls each of these
4 adjustments, right?

5 A. It's part of the control. As we
6 discussed before there are other components that
7 actually would implement that, like a power
8 supply unit or a volume control signal.

9 Q. But all of the other components that
10 would implement this are included in Kim's
11 television, right?

12 A. I think that's fair.

13 Q. If you go to Figure 2 of Kim, which is
14 way at the back --

15 A. Yeah.

16 Q. -- Page 44, I guess I can't say which
17 one is better or worse, it's just a complete
18 difference.

19 A. You get trained, and then you've got to
20 flip your training.

21 Q. It's something else. So do you have
22 Figure 2 on Page 44 of Kim opened?

23 A. I have it in front of me, yeah.

24 Q. Real quick you can keep this page open,
25 but if you go to Page 6 of Kim it just says at

1 Lines 9 through 11 that: "Figure 2 is a block
2 diagram illustrating a TV system for the purpose
3 of an emergency-warning broadcast in accordance
4 with a preferred embodiment of the present
5 invention," right?

6 A. Yes.

7 Q. So in Figure 2, Kim's T.V. has a
8 broadcast signal receiver that receives a signals
9 from an antenna, right?

10 A. Yes.

11 Q. So what Kim's system does, it receives
12 messages and detects if they include emergency
13 warning broadcast start signals, right?

14 A. That's fair.

15 Q. And so Kim responds -- Kim adjusts the
16 television in response to these received messages
17 without control of the messages themselves,
18 right?

19 MR. STAVINOHHA: Objection, form.

20 A. Repeat that.

21 Q. (BY MR. KANTAREK) Let me maybe adjust
22 it a little bit. Kim adjusts its television
23 based on broadcast signals received without
24 control of what's inside the broadcast signals
25 themselves, right?

1 MR. STAVINOHA: Objection, form.

2 A. The broadcast signal is, in effect, a
3 one-way broadcast.

4 Q. (BY MR. KANTAREK) Right, so the signal
5 is what it is when Kim receives it?

6 A. Yes.

7 Q. Kim can't change the broadcast signal?

8 A. Right. It's whatever is broadcast over
9 the air.

10 Q. All right. I don't have any further
11 questions.

12 If you want to take a break and we can
13 go off the record, if you want.

14 MR. STAVINOHA: Kyle, why don't you
15 give me 15 minutes then we can circle back up.

16 MR. KANTAREK: Sounds good. I'll
17 see everyone at 2:00.

18 (Brief recess taken.)

19 MR. STAVINOHA: I have no questions
20 for Mr. Williams, and we can go off the record.
21 Thank you.

22 THE REPORTER: And what do you all
23 want, a rough, a rush?

24 MR. KANTAREK: I think we wanted
25 the same as the last time, I think the rough in

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1 two days. I would just like the final in a week,
2 and I'm guessing the rough in two days, but I'm
3 not positive.

4 MR. STAVINOHHA: Since we got
5 realtime, are we obligated to get anything, or
6 otherwise? We'll just do the regular turnaround.

7 THE REPORTER: Sure, if you don't
8 want a rough, that's fine; otherwise, the
9 realtime just disappears.

10 (Deposition ended at 2:02 p.m.)
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C E R T I F I C A T E

I, Peggy E. Corbett, a Certified Court Reporter of the State of Missouri, do hereby certify:

That prior to being examined the witness was by me duly sworn;

That said deposition was taken down by me in shorthand at the time and place hereinbefore stated and was thereafter reduced to writing under my direction;

That I am not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel, or financially interested in the action.

WITNESS my hand and seal this 13th day of June, 2024.



PEGGY E. CORBETT,
CCR No. 143, RDR, CRR

1 Clarke Stavinoha

2 clarke.stavinoha@bakerbotts.com

3 June 13th, 2024

4 RE: Motorola Solutions, Inc. v. Sta Group, LLC

5 6/12/2024, David Hilliard Williams (#6721661)

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 133

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA SOLUTIONS, INC.,

Petitioner,

v.

STA GROUP LLC,

Patent Owner.

IPR2023-01294

Patent 8,831,664 B2

**ERRATA SHEET FOR THE JUNE 12, 2024 DEPOSITION OF DAVID
HILLIARD WILLIAMS**

I, David Hilliard Williams, do hereby make the following corrections to my
June 12, 2024 deposition transcript:

PAGE	LINE	CHANGE/CORRECTION	REASON
9	1	“A. Yes. I’m going to call this the ‘664” to “A. Yes. Q. I’m going to call this the ‘664”	Transcription Error
18	13	“projection,” to “rejection,”	Transcription Error
28	19	“just” to “adjust”	Transcription Error
39	8	“I mean” to “I mean - -”	Transcription Error
42	3	“Its ground.” to “This ground.”	Transcription Error
44	11	“emergent” to “emergency”	Transcription Error
55	15	“doing” to “do”	Transcription Error
69	3	“top” to “talk”	Transcription Error
69	8	“top” to “talk”	Transcription Error
69	21	“top” to “talk”	Transcription Error
69	25	“top” to “talk”	Transcription Error
70	6	“top” to “talk”	Transcription Error
70	9	“are” to “are - -”	Transcription Error
75	19	“caller” to “color”	Transcription Error
81	16	“controlling working” to “control and working”	Transcription Error
81	21	“self-figure” to “sub-figure”	Transcription Error

85	8	"MR. STAVINOHA" to "MR. WILLIAMS"	Transcription Error
85	14	"describes the" to "describes what the"	Transcription Error
102	15	"Yep." to "Nope."	Transcription Error
104	20-21	"call a definition inspection" to "call definition section"	Transcription Error
106	3	"top" to "talk"	Transcription Error
110	2	"in+" to "in"	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 26, 2024



David Hilliard Williams

1			
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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.

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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.

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