In the Matter Of:

WHATFIX INC. vs WALKME LTD.

DR. HOMAYOON BEIGI

June 26, 2024

Vol.2

IPR2023-01379
WHATFIX INC. v. WALKME LTD.
WALKME LTD. EXHIBIT 2004
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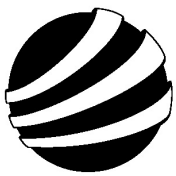

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UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
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WHATFIX INC.,

Petitioner,

v.

WALKME LTD.,

Patent Owner.
----------X

Volume 2

VIDEOTAPED DEPOSITION OF DR. HOMAYOON BEIGI

DATE: June 26, 2024

TIME: 10:06 a.m.

PLACE: 405 Lexington Avenue, New York, New York

BEFORE: Rebecca Schaumloffel, RPR, CCR-NJ

JOB NO: J11386749

A P P E A R A N C E S:

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BY: CHARLES MACEDO, ESQ.
THOMAS HART, ESQ.

ALSO PRESENT:

Ziv Glazberg, Esq.

Lilach Danzig, Esq.

Bryamz Villanueva, videographer

* * *

H. BEIGI

THE VIDEOGRAPHER: We are now on the record. The time is 10:07 a.m. This begins Media Number 1 to the videotaped deposition of Homayoon Beigi taken in the matter of Whatfix Inc. versus Walkme Ltd. My name is Bryamz Villanueva; I'm the videographer today. The court reporter is Rebecca Schaumloffel. All appearances are noted on the stenographic record. 10:06AM 10:06AM 10:06AM 10:06AM 10:07AM 10:07AM 10:07AM 10:07AM 10:07AM 10:07AM

HOMAYOON BEIGI, called as a witness, having been first duly sworn by a Notary Public of the State of New York, New Jersey, and Pennsylvania was examined and testified as follows:

EXAMINATION BY 10:07AM

MS. NGUYEN: 10:07AM

Q. Good morning, Dr. Beigi. 10:07AM

A. Good morning. 10:07AM

Q. Are you presently under the influence of alcohol or medication that would impair you to testify here today? 10:07AM 10:07AM

A. No. 10:07AM

H. BEIGI

Q. And you understand that you have taken an oath to tell the truth? 10:07AM

A. Yes. 10:07AM

Q. And is there any reason you cannot give complete and accurate testimony today? 10:07AM

A. No. 10:07AM

Q. Have you discussed the substance of this deposition with your counsel after we started the deposition yesterday morning? 10:07AM

A. No, not at all. 10:07AM

Q. Dr. Beigi, do you recall yesterday discussing with patent owner's counsel and patent owner's counsel asking why you made a second Declaration with respect to the '664 patent? 10:07AM

A. Yes. 10:08AM

Q. And with respect to the '664 patent, patent owner's counsel asked you yesterday, quote, "Why did you make a second Declaration? Why didn't you just include it in the first Declaration, whatever you put in there?" 10:08AM

Do you recall that? 10:08AM

A. Yes. 10:08AM

H. BEIGI

Q. And you testified, "It was just an afterthought to include some more information, yes, in the second Declaration." 10:08AM

And that was in quotes.

A. Yes.

Q. Do you recall that?

A. Yes.

Q. I wanted to ask you a few questions about the term "afterthought."

A. Yes.

Q. By afterthought, were you simply referring to the second '664 Declaration being filed after the first '664 Declaration?

A. Ask the question again. I want to make sure that I'm answering properly.

Q. Yeah. Okay.

So by using the term "afterthought," were you simply referring to the second '664 Declaration being filed after the first '664 Declaration?

MR. MACEDO: Objection to form.

A. It was -- it was a continuation. It was the second -- the second Declaration.

THE COURT REPORTER: Doctor,

H. BEIGI

I just need you to speak up. Okay? 10:09AM

THE WITNESS: Sorry, yes. It was -- 10:09AM

THE COURT REPORTER: I have the answer. Thank you. 10:09AM

BY MS. NGUYEN: 10:09AM

Q. And your reference to "afterthought," it was not a statement about the merits of the second '664 Declaration, right? 10:09AM

MR. MACEDO: Objection to form. 10:09AM

A. No, it wasn't a reconsideration, if that's what you are asking. It wasn't reconsidering the '664 in any way, like rethinking it. 10:10AM

MR. MACEDO: Doctor, do you mind speaking a little louder? It's kind of hard to hear you. Sorry. The microphone doesn't project. It only records. 10:10AM

BY MS. NGUYEN: 10:10AM

A. Sorry. 10:10AM

Yes, it wasn't a reconsideration. It was -- it was just that somethings to add 10:10AM

H. BEIGI

to -- you know, to the first -- to the first Declaration, basically. I would call it maybe supplemental. 10:10AM

Q. Okay. 10:10AM

A. I don't know the lingo, but to me it is like a supplemental Declaration, like continuation of the Declaration. 10:10AM

Q. Okay. And you spent time on the second '664 Declaration and you stand by it? 10:10AM

A. Yes, I do. 10:10AM

Q. Okay. So you would never refer to the Declaration, the second '664 Declaration, as an afterthought Declaration or -- yeah, as counsel did yesterday, right? 10:10AM

MR. MACEDO: Objection to the form. 10:11AM

A. So maybe we have a different definition of what an afterthought -- an afterthought is. So I -- I basically -- it is a supplement -- I would classify it as a supplemental, as a continuation, as a -- something that was missing and I have to put in. 10:11AM

Q. Okay. Dr. Beigi, do you recall 10:11AM

H. BEIGI

yesterday Patent Owner's counsel asking you what does human natural language mean? 10:11AM 10:11AM

A. Yes. 10:11AM

Q. And when asked, you said, quote, "It is what we are using right now to communicate, you and I"? 10:12AM 10:12AM 10:12AM

A. Yes. 10:12AM

Q. Patent Owner's counsel then asked you, quote, "So would you" -- sorry, quote, "So would a form where you fill in name, address, telephone number, would that be human natural language?" 10:12AM 10:12AM 10:12AM 10:12AM 10:12AM

And you testified, quote, "No." 10:12AM

Do you recall that testimony? 10:12AM

A. Yes. 10:12AM

Q. I want to ask you some more questions about that testimony. 10:12AM 10:12AM

There is a difference between communication between a person and a chatbot compared to a form that is subsequently filled out by an RPA based on that communication. 10:12AM 10:12AM 10:12AM 10:12AM

MR. MACEDO: Objection to form. 10:12AM

Q. Correct? 10:12AM

H. BEIGI

MR. MACEDO: That's leading, Counsel. 10:12AM

A. Yes. 10:12AM

Q. And is that what you meant, that a form where you fill in -- 10:12AM 10:13AM

MR. MACEDO: Objection. 10:13AM

Q. -- name, address, telephone number is not a human natural language? 10:13AM 10:13AM

MR. MACEDO: Objection to form. Counsel, you are leading the witness. It's your witness. You are not supposed to be leading them. 10:13AM 10:13AM 10:13AM 10:13AM

If you are going to continue to ask leading questions, we really do have to take a break and call the board. It's not appropriate. This is redirect. You are supposed to be asking your client, your witness, non-leading questions. And you are putting the definitions into it instead of having him put in it. 10:13AM 10:13AM 10:13AM 10:13AM 10:13AM 10:13AM 10:13AM 10:13AM

If you want to ask him what he meant, ask him what he meant, but don't give him a leading question. 10:13AM 10:13AM

H. BEIGI

That's really inappropriate. 10:13AM

MS. NGUYEN: Counsel -- 10:13AM

BY MS. NGUYEN: 10:13AM

Q. Can we go back to the question? 10:13AM

Okay. 10:14AM

So before I was interrupted, 10:14AM

Dr. Beigi, is that what you meant, that a 10:14AM

form where you fill in name, address, 10:14AM

telephone number is not a human natural 10:14AM

language? 10:14AM

MR. MACEDO: Objection to form. 10:14AM

A. Like I said, filling a form is not 10:14AM

human natural language unless the form is 10:14AM

asking you to type in something that it would 10:14AM

understand, which would be free form. 10:15AM

So by the word "form," I don't 10:15AM

mean free form. So free form meaning you can 10:15AM

just type in anything you want and it will 10:15AM

understand. That would be natural language. 10:15AM

If it's a form where you would just have the 10:15AM

choice of just that one thing that you would 10:15AM

either click or select or something like 10:15AM

that, that's what I call a form. 10:15AM

As long as there is natural 10:15AM

H. BEIGI

language that has to be understood, that's natural language communication. 10:15AM 10:15AM

Q. So if a form that is subsequently filled out by an RPA is based on a communication, would that form be considered natural language processing? 10:15AM 10:15AM 10:15AM 10:15AM

A. The communication part of it is natural language processing, and then the RPA fills the form using the natural language processing, and that form, again, because the RPA could be communicating with another system that understands natural language, it could also be typing in some natural language. 10:16AM 10:16AM 10:16AM 10:16AM 10:16AM 10:16AM 10:16AM

As long as the RPA is filling the form the way I just explained it, which is just picking choices, then the part where the communication was done to the RPA within natural language is natural language processing, and the part that the RPA fills, again, if it fills human natural language, because it can generate human natural language, then that is natural language. 10:16AM 10:16AM 10:16AM 10:16AM 10:16AM 10:16AM 10:16AM 10:16AM

If it picks something from 10:16AM

H. BEIGI

selections or things like that, like the forms that we are all used to, then it is filling a form. 10:16AM 10:16AM 10:17AM

So I think we need to distinguish between the input and the output and also whether the output is actually natural language itself. 10:17AM 10:17AM 10:17AM 10:17AM

I think that -- I hope that clarifies. 10:17AM 10:17AM

Q. Dr. Beigi, do you recall yesterday that counsel for Patent Owner provided you with a copy of an article marked Exhibit 19? 10:17AM 10:17AM 10:17AM

A. Yes, I saw it this morning besides. I think this is what you are referring to, different types of chatbots. That's it. 10:17AM 10:18AM 10:18AM 10:18AM

Q. What year is indicated on Exhibit 19? 10:18AM 10:18AM

A. It's August 29, 2019. 10:18AM

Q. And the year indicated on Exhibit 19 is after the earliest filing date of the patents in dispute, correct? 10:18AM 10:18AM 10:18AM

A. Yes. 10:18AM

Q. Who is the author of the article? 10:18AM

H. BEIGI

A. It says Khoros or Khoros Staff. I'm not sure if there is a person that's associated with it. Unless I'm missing it somewhere. I mean, it is customary under the title to put the author, and it says -- I'm not sure if it is Khoros or Khoros Staff. 10:18AM 10:18AM 10:18AM 10:18AM 10:19AM 10:19AM

Q. Is the individual author defined in Exhibit 19? 10:19AM 10:19AM

A. Unless the person's last name is Staff and his first name is -- or her first name is Khoros, then not. It seems like it may be a staff writing it. I can't tell based on that. 10:19AM 10:19AM 10:20AM 10:20AM 10:20AM

Q. So you don't know who is making the statements in Exhibit 19, correct? 10:20AM 10:20AM

A. Yes, I'm not sure if it is a group of people, staff of people, or the person's last name is Staff. 10:20AM 10:20AM 10:20AM

Q. Dr. Beigi, do you recall yesterday counsel for Patent Owner asking you about the purpose or the point of Allen? 10:20AM 10:20AM 10:20AM

A. Yes. 10:20AM

Q. And counsel asked you whether the point of Allen is a simple way to teach an 10:20AM

H. BEIGI

automation process.

Do you recall that? 10:20AM

A. Somewhat. Yes. 10:20AM

Q. And when asked, you testified, quote, "Yes, but I have to first teach it." 10:20AM 10:21AM

Do you recall that testimony? 10:21AM

A. Yes. 10:21AM

Q. Then counsel asked whether the conversation of how a user can implement Allen to automate buying a book is pertinent? 10:21AM 10:21AM 10:21AM

A. Yes. 10:21AM

Q. And then you testified that, quote, "Part of the point of Allen is that it is flexible and it will find the places where it actually has to put the book title." 10:21AM 10:21AM 10:21AM 10:21AM

A. Yes. 10:21AM

Q. Do you recall that? 10:21AM

A. Yes. 10:21AM

Q. Would you agree that Allen is not directed to only teaching an automation process? 10:21AM 10:21AM 10:21AM

MR. MACEDO: Objection to form. 10:21AM

Leading. 10:21AM

A. Yes. 10:21AM

H. BEIGI

Q. Dr. Beigi, do you recall yesterday counsel for Patent Owner asking you about the technical problems being addressed in the WalkMe patents? 10:21AM 10:22AM 10:22AM 10:22AM

A. Yes. 10:22AM

Q. And counsel for Patent Owner -- 10:22AM

MR. MACEDO: I'm sorry. 10:22AM

Q. -- yesterday referred you to the '732 patent? 10:22AM 10:22AM

A. Yes. 10:22AM

Q. Do you have the exhibit for the '732 patent available? 10:22AM 10:22AM

MS. NGUYEN: Do you have the exhibit number? 10:22AM 10:22AM

MR. MACEDO: Exhibit 9. 10:22AM

Q. Exhibit 9. 10:22AM

A. Yes, I do. 10:22AM

Q. And yesterday counsel for Patent Owner asked you to read a sentence starting at column 4. Please let me know when you are there. 10:23AM 10:23AM 10:23AM

A. Yes. I think it was at the bottom, right, detailed description? 10:23AM 10:23AM

Q. Line 59. 10:23AM

H. BEIGI

A. Yes. 10:23AM

Q. Of the '732. 10:23AM

A. Yes. 10:23AM

Q. And column 4, line 59 of the '732 reads, "One technical problem dealt with by the disclosed subject matter is to provide for a user-friendly manner of defining functionality of chat bots" -- 10:23AM

A. Yes. 10:23AM

Q. -- right? 10:23AM

And you recall reading that yesterday to counsel? 10:23AM

A. I do. 10:24AM

Q. And then counsel for Patent Owner asked and directed you to column 5, line 49, of the '732 patent. 10:24AM

A. Yes. 10:24AM

Q. And column 5, line 49, of the '732 reads, "Another technical problem may be to enable defining automation processes in a manner that enables them to be implemented even if changes are performed to the underlying platform." 10:24AM

A. Yes. 10:24AM

H. BEIGI

Q. Do you recall reading that out to counsel yesterday? 10:24AM

A. Yes. 10:24AM

Q. Okay. And those are the two technical problems that you read to counsel for Patent Owner yesterday? 10:24AM

A. I believe so, yes. 10:24AM

Q. If I can have you turn to column 8, line 38, and read the sentence starting at column 8, line 38 out loud, please. 10:24AM

A. "Additional technical problem, solution, and effects may be a pattern to a person of ordinary skill in the art in view of the present disclosure." 10:25AM

Shall I continue? 10:25AM

Q. No, Dr. Beigi. 10:25AM

Would you agree that the '732 patent discloses that there are additional technical problems? 10:25AM

A. Yes. 10:25AM

MS. NGUYEN: Okay. We would like to take a break. 10:25AM

THE VIDEOGRAPHER: We are going 10:25AM

H. BEIGI

off the record. The time is 10:26 a.m. 10:25AM

(Whereupon, a recess was held.) 10:25AM

THE VIDEOGRAPHER: We are going back on the record. The time is 10:49 a.m. 10:48AM 10:49AM 10:49AM

MS. NGUYEN: We have no further questions, and we pass the witness to Patent Owner. 10:49AM 10:49AM 10:49AM

MR. MACEDO: Great. 10:49AM

EXAMINATION BY 10:49AM

MR. MACEDO: 10:49AM

Q. One question, are you satisfied that your testimony yesterday and today is truthful, accurate, and complete? 10:49AM 10:49AM 10:49AM

A. Yes. 10:49AM

MR. MACEDO: We are done. 10:49AM

THE VIDEOGRAPHER: This concludes the deposition of Homayoon Beigi. We are going off the record at 10:50 a.m. 10:49AM 10:49AM 10:49AM

(Whereupon, at 10:50 a.m., the Examination of this Witness was concluded.)

H. BEIGI

MR. MACEDO: The parties agreed that the Patent Owner will retain the original deposition exhibits.

MS. NGUYEN: Agreed.

_____
HOMAYOON BEIGI

Subscribed and sworn to before me this _____ day of _____, 2024.

_____
NOTARY PUBLIC

H. BEIGI

I N D E X

EXAMINATION BY PAGE
MS. NGUYEN 329

INFORMATION AND/OR DOCUMENTS REQUESTED

INFORMATION AND/OR DOCUMENTS PAGE

(none)

H. BEIGI

C E R T I F I C A T E

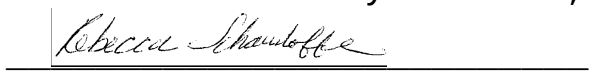
STATE OF FLORIDA

I, REBECCA SCHAUMLOFFEL, a Notary Public for and within the State of Florida, do hereby certify:

That the witness whose examination is hereinbefore set forth was duly sworn and that such examination is a true record of the testimony given by that witness.

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

IN WITNESS WHEREOF, I have hereunto set my hand this 27th day of June, 2024.



REBECCA SCHAUMLOFFEL

ERRATA SHEET FOR THE TRANSCRIPT OF:

Case Name: Whatfix v. WalkMe

Dep. Date: June 26, 2024

Deponent: HOMAYOON BEIGI

CORRECTIONS:

Pg.	Ln.	Now Reads	Should Read	Reason
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Signature of Deponent

SUBSCRIBED AND SWORN BEFORE ME

THIS____DAY OF_____,2024.

_____

(Notary Public) MY COMMISSION EXPIRES:_____

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