In the Matter Of:

WHATFIX INC. V. WALKME LTD.

IPR-2023-01368

HOMAYOON BEIGI

November 11, 2024

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1 H. Beigi - 11.11.24
2 UNITED STATES PATENT AND TRADEMARK OFFICE
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD
4 ----------X
5 WHATFIX INC.,
6 Petitioner,
7 v. IPR2023-01368
Patent 10,819,664 B2
8 WALKME LTD.,
9 Patent Owner.
10 ----------X
11
12 DEPOSITION OF HOMAYOON BEIGI
13 November 11, 2024
14
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16
17 Reported by:
18 MARY F. BOWMAN, RPR, CRR
19 JOB NO. J11937107
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November 11, 2024
9:09 a.m.

Deposition of HOMAYOON BEIGI, held at Amster, Rothstein & Ebenstein, 405 Lexington Avenue, New York, New York, before Mary F. Bowman, a Registered Professional Reporter, Certified Realtime Reporter, and Notary Public of the States of New Jersey and New York.

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APPEARANCES:

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

ALSO PRESENT:
Ziv Glazberg, Esq.
Ivan Zatkovich

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HOMAYOON BEIGI, 09:07
called as a witness by the parties, 09:07
having been duly sworn, testified as 09:07
follows: 09:07
EXAMINATION BY 09:07
MR. MACEDO: 09:08
Q. Good morning. 09:08
A. Good morning. 09:08
Q. Dr. Beigi, can you please state your 09:08
name and residence on the record? 09:08
A. Homayoon Beigi. I live in South 09:08
Salem, New York, 49 Bouton Road. 09:08
MR. MACEDO: Okay. So I'm going to 09:09
mark as Beigi Exhibit 22 the patent 09:09
owner's second notice of deposition of 09:09
Dr. Homayoon Beigi from IPR2023-01368 for 09:09
Patent Number 10,819,664 B2. 09:09
(Exhibit 22, document entitled 13:13
"Notice of Deposition of Dr. Homayoon 13:13
Beigi," marked for identification, as of 13:13
this date.) 13:13
MR. MACEDO: And I'm going to mark 09:09
as Beigi Exhibit 23 the patent owner's 09:09
notice of second deposition of 09:10

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Dr. Homayoon Beigi from IPR2023-01379 09:10
associated with U.S. Patent 09:10
Number 11,258,732 B2. 09:10
(Exhibit 23, document entitled 09:10
"Notice of Deposition of Dr. Homayoon 09:10
Beigi," marked for identification, as of 09:10
this date.) 09:10
MR. MACEDO: And I'm going to mark 09:10
as Beigi Exhibit 24 patent owner's notice 09:10
of second deposition of Dr. Homayoon Beigi 09:10
from IPR2024-00065 for Patent 09:10
Number 11,558,317 B2. 09:10
(Exhibit 24, document entitled 09:11
"Notice of Deposition of Dr. Homayoon 09:11
Beigi," marked for identification, as of 09:11
this date.) 09:12
Q. And, Dr. Beigi, do you recognize 09:12
Exhibit 22? 09:12
A. Yes, I do. 09:12
Q. And how do you recognize it? 09:12
A. I was given a copy by the counsel. 09:12
Q. And do you recognize Exhibit 23? 09:12
A. Yes. 09:12
Q. And how do you recognize it? 09:12

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A. The same, I was given a copy. 09:12
Q. And do you recognize Exhibit 24? 09:12
A. I do. 09:12
Q. And how do you recognize it? 09:12
A. I was given a copy. 09:12
Q. Okay. And you understand that you 09:12
are appearing here today for all three of those 09:12
notices and the consolidated deposition for all 09:12
three IPRs, correct? 09:12
A. I do. 09:12
Q. Okay. 09:12
MR. MACEDO: And, Counsel, you agree 09:12
that we stipulate this can be used in all 09:12
three IPRs, today's transcript and 09:12
tomorrow's transcript? 09:12
MS. NGUYEN: Correct. 09:12
Q. And you were previously deposed in 09:13
the context of these three IPRs by me, correct? 09:13
A. Yes. 09:13
Q. And you were deposed for two days, 09:13
right? 09:13
A. Yes. 09:13
MR. MACEDO: Okay. So I'm going to 09:13
mark as Exhibit 25 -- I'm going to mark as 09:13

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Beigi Exhibit 25 the deposition transcript 09:13
of Homayoon Beigi from June 25, 2024. 09:14
(Exhibit 25, deposition transcript 09:14
of Homayoon Beigi, dated June 25, 2024, 09:14
marked for identification, as of this 09:14
date.) 09:14
Q. And ask if you recognize it. 09:14
MS. NGUYEN: Counsel, is there a 09:14
reason why Dr. Beigi is -- 09:14
MR. MACEDO: Single-sided because 09:14
it's the exhibit, and I gave you 09:14
double-sided so you didn't have to copy so 09:14
much. 09:14
MS. NGUYEN: Thank you. 09:14
MR. MACEDO: And, Counsel, we did 09:15
that with all the exhibits that were 09:15
marked. 09:15
A. Yes, it seems to be the transcript 09:15
of my last deposition. 09:15
Q. And have you reviewed that 09:15
transcript before today? 09:15
A. I have. 09:15
Q. And did you find any mistakes or 09:15
errors in the transcript? 09:15

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A. I did. 09:15
Q. You did? 09:15
A. Yes. 09:15
Q. And did you provide a correction 09:15
sheet to anyone of those mistakes and errors? 09:15
A. I did to the counsel. 09:15
Q. And were they typos or were there 09:15
any substantive errors? 09:15
A. Some typos, some -- it's been a 09:15
while now because I did it back then. 09:16
There may have been a few mistaken 09:16
negations or things like that. 09:16
MR. MACEDO: Counsel, do you have 09:16
those corrections? 09:16
MS. NGUYEN: We can discuss this 09:16
later. 09:16
MR. MACEDO: Well, since it impacts 09:16
his testimony here today, I think the 09:16
answer is "yes" or "no" or "I don't know." 09:16
MS. NGUYEN: I don't know. 09:16
Q. Okay. Dr. Beigi, do you have those 09:16
corrections somewhere that you can access it? 09:16
A. No. I didn't bring anything with 09:16
me. I just brought my phone. 09:16

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Q. Did you email it to counsel that you can find it in your email if we take a break? 09:16 09:16

A. No. I used a system for uploading. 09:16

Q. Okay. 09:16

MR. MACEDO: I'm going to mark as Beigi Exhibit 26 the -- your deposition transcript from June 26, 2024, Volume 2. 09:16 09:17 09:17

(Exhibit 26, deposition transcript of Homayoon Beigi, dated June 26, 2024, Volume 2, marked for identification, as of this date.) 09:17 09:17 09:17 09:17

Q. Do you recognize Beigi Exhibit 26? 09:17

A. Yes, I do. 09:17

Q. And how do you recognize Beigi Exhibit 26? 09:17 09:17

A. I was given a copy of it. 09:17

Q. And it reflects a transcript of your deposition on day two -- 09:17 09:17

A. Yes. 09:17

Q. -- from the prior deposition? 09:17

A. Same thing, yes. 09:17

Q. Okay. And did you find any errors in that transcript? 09:17 09:17

A. I did the whole thing as a whole. 09:17

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So I'm not sure whether there were errors in 09:17
this one. Definitely the other one, bigger 09:18
transcript, definitely had errors. This one may 09:18
have had just a few as well, but I don't 09:18
remember any at this point. 09:18
Q. And did you note any errors in the 09:18
transcript in any of your reply declarations 09:18
that were submitted in these cases? 09:18
A. No. 09:18
Q. Let's go ahead and mark your reply 09:18
declarations. 09:18
MR. MACEDO: So we are now going to 09:18
mark as Beigi Exhibit 27 the Reply 09:19
Declaration of Dr. Homayoon Beigi for 09:19
IPR2023-01368 relating to U.S. Patent 09:19
Number 10,819,664. 09:19
(Exhibit 27, document entitled 09:19
"Reply Declaration of Dr. Homayoon Beigi," 09:19
marked for identification, as of this 09:19
date.) 09:19
MR. MACEDO: I'm going to mark as 09:19
Beigi Exhibit 28 your Reply Declaration of 09:19
Dr. Homayoon Beigi from Inter Partes 09:20
Review Number IPR2023-01379 relating to 09:20

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U.S. Patent Number 11,258,732. 09:20

(Exhibit 28, document entitled 09:20

"Reply Declaration of Dr. Homayoon Beigi," 09:20

marked for identification, as of this 09:20

date.) 09:20

MR. MACEDO: And we are going to 09:20

mark as Beigi Exhibit 29 the Reply 09:20

Declaration of Dr. Homayoon Beigi Inter 09:20

Partes Review Number IPR2024-00065 Patent 09:20

Number 11558317. 09:20

(Exhibit 29, document entitled 09:20

"Reply Declaration of Dr. Homayoon Beigi," 09:20

marked for identification, as of this 09:20

date.) 09:20

Q. Dr. Beigi, I see you are reviewing 09:21

your transcript, which is -- I mean, reviewing 09:21

the documents, which is what I want you to do. 09:21

Please take your time because I'm going to ask 09:21

you for each one whether you recognize it. 09:21

Are you done reviewing? 09:22

A. Yes. 09:22

Q. Okay. Do you recognize Exhibit -- 09:22

Beigi Exhibit 27? 09:22

A. Yes, I do. 09:22

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Q. And what is it? 09:22
A. That's my reply declaration for 09:22
Patent Number '664. 09:22
Q. Okay. And you are using '664 as the 09:22
last three digits of U.S. Patent 09:22
Number 10,819,664 from IPR2023-01368, correct? 09:22
A. I am. 09:23
Q. And if we refer to that patent as 09:23
the '664 patent throughout this deposition, you 09:23
will understand what that is? 09:23
A. Yes. 09:23
Q. Okay. And, Dr. Beigi, I'm going to 09:23
give you the exhibits we have already previously 09:23
marked, the original versions that we marked, so 09:23
you can refer to them again, if you want to. 09:23
A. Thank you. 09:23
Q. Okay. Including the '664 patent, 09:23
which he is pulling for you now. 09:23
A. Yes. 09:23
Q. So I am handing you what was 09:23
previously marked as the original as Beigi 09:23
Exhibit 8 at your June 25, 2024 deposition and 09:23
it is U.S. Patent Number 10,819,664. 09:23
I'm going to leave the Post-it on 09:24

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it, which says, "Original Exhibit," so we know 09:24
this is the original, not a photocopy. 09:24
A. Yes. Thank you. 09:24
Q. Okay. And when we refer to the '664 09:24
patent, you are referring to Beigi Exhibit 8, 09:24
correct? 09:24
A. Yes. 09:24
Q. Okay. And during these proceedings, 09:24
that was marked as Exhibit 1001 at the bottom of 09:24
the page. 09:24
A. Yes. 09:24
Q. Okay. So you said you recognized 09:24
Beigi Exhibit 27 as relating to Beigi Exhibit 8 09:24
IPR reply declaration, correct? 09:24
A. Yes. 09:24
Q. Okay. And have you reviewed in 09:24
preparation for today's deposition Beigi 09:24
Exhibit 27? 09:24
A. Yes. 09:24
Q. And did you find any mistakes or 09:24
errors which need to be corrected? 09:25
A. No. 09:25
Q. And do you testify here now that, in 09:25
your opinion, everything in Beigi Exhibit 27 is 09:25

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truthful and correct to the best of your 09:25
ability? 09:25
A. To the best of my ability, yes. 09:25
Q. And that there are no errors in it? 09:25
A. As far as I know, no. 09:25
Q. And do you believe that you fully 09:25
complied with your obligations in preparing 09:25
Beigi Exhibit 27 to the PTAB in terms of the 09:25
information you provided? 09:25
A. I'm not sure if I understand the 09:25
question. Sorry. 09:25
Q. Well, do you understand that you had 09:25
any obligations to provide any specific 09:25
information when you submitted Beigi Exhibit 27 09:25
for use in IPR2023-01368? 09:25
A. What do you mean by "specific 09:25
information"? I'm sorry. 09:25
Q. Is there anything that you need to 09:25
do as an expert to submit, like providing if you 09:25
are being paid, for example? 09:26
A. Yes. In the introduction of the 09:26
declaration, I have provided information -- such 09:26
information. 09:26
Q. You -- talking about paragraph 2? 09:26

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A. Paragraphs 1 and 2, being retained 09:26
and I'm being paid. 09:26
Q. And in paragraph 2, you say, "I am 09:27
being paid at my standard consulting rate." 09:27
Correct? 09:27
A. Yes. 09:27
Q. But you didn't say what the standard 09:27
consulting rate was. 09:27
A. We spoke about this in the last 09:27
deposition. It's the same rate. 09:27
Q. And what is that rate? 09:27
A. Like I mentioned in the previous 09:27
deposition, because there is a third party 09:27
involved, which is -- which is IMS Experts, that 09:27
I'm retained through, there is a markup that 09:27
they do. 09:27
So my standard rate, I'm not sure 09:27
what excess payment I miss for that rate, but my 09:27
standard rate is standard to IMS, and I'm 09:27
obligated not to produce that because, of 09:27
course, because they mark it up. 09:27
However, I gave you a ballpark last 09:27
time, and it's the same ballpark. It's on 09:27
record. 09:28

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Q. So you are intentionally not 09:28
providing the amount of money that you are being 09:28
paid as you're standard rate because it would 09:28
violate your NDA with the service that retained 09:28
you, is that it? 09:28
A. That's correct. 09:28
Q. And so the board does not have what 09:28
your standard consulting rate that you're 09:28
charging is in the record because you consider 09:28
it a violation of an NDA, correct? 09:28
A. The exact amount cannot -- yeah, 09:28
because of the NDA, I cannot produce the exact 09:28
amount. 09:28
I did give you a ballpark figure in 09:28
our last deposition because I was forced to by 09:28
continuously asking to do so. 09:28
Q. And I'm going to continuously ask 09:28
you again if you don't say it now. 09:28
A. And may I just refer you to our 09:28
previous deposition? Because it's on record. 09:28
Q. Then you can say it. So you have 09:28
the deposition in front of you, look at anything 09:28
you want, but I'm asking you to identify for the 09:29
board what your standard consulting rate that 09:29

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you are charging in this deposition. 09:29
I don't care what your client is 09:29
paying but I'm just asking what you are being 09:29
paid. 09:29
A. That's the part that I'm under NDA 09:29
not to divulge. However, I can tell you, like I 09:29
did last time, that's in the ballpark of 450 to 09:29
500, in that range. 09:29
Q. Okay. 09:29
And do you know what the markup that 09:29
IMS is charging your ultimate client? 09:29
A. I'm not privy to that. I have no 09:29
idea. 09:29
Q. But in any event, whatever that 09:29
markup is, you're not receiving? 09:29
A. No, I'm not. 09:29
Q. Is there any other things that you 09:29
understand you are obligated to disclose in 09:29
order to qualify as an expert witness in this 09:29
case? 09:29
MS. NGUYEN: Objection, form. 09:29
A. I believe my background, which I had 09:30
previously disclosed in my previous declaration 09:30
in full, and since this declaration is a 09:30

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continuation, a lot of the information is 09:30
actually available in my previous declaration, 09:30
which was Exhibit 1003 listed in this as one of 09:30
the exhibits. 09:30
Q. And is there any information which 09:30
has changed since Exhibit 1003 that you are 09:30
referring to was prepared and submitted to the 09:30
PTAB? 09:31
A. No. 09:31
Q. So you have no credentials beyond 09:31
the credentials that were identified in your 09:31
original declaration marked as Exhibit 1003 in 09:31
IPR Number 2023-01368 -- 09:31
MS. NGUYEN: Objection, form. 09:31
Q. -- is that correct? 09:31
A. I have since published no papers but 09:31
incremental things basically. 09:31
Q. And do any of those papers have 09:31
information that relate to the subject matter of 09:31
any of the three IPRs? 09:31
A. No, they don't. 09:31
Q. So does it add to your 09:31
qualifications to be an expert with respect to 09:31
any of the three IPRs that you published those 09:31

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additional papers since you submitted 09:31
Exhibit 1003 in IPR2023-01368? 09:31
A. I don't believe so. It's just an 09:31
incremental maintenance of my capabilities. 09:31
I -- I am an active professional -- 09:31
Q. And did you -- 09:32
A. -- so I continue my profession. 09:32
Q. Did you publish anything dealing 09:32
with chatbots? 09:32
A. No. 09:32
Q. Did you publish anything dealing 09:32
with natural language processing? 09:32
MS. NGUYEN: Objection, form. 09:32
A. Natural language processing is one 09:32
of my fields. So because I'm in the field of 09:32
speech recognition, and natural language 09:32
processing being part of it, so I have some 09:32
publications that do relate to natural language 09:32
processing. 09:32
Q. Since you submitted Exhibit 1001? 09:32
A. Yes. 09:32
Q. Okay. So in addition to requesting 09:32
copies of the errata sheets that you have 09:32
submitted for your two prior deposition 09:32

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transcripts, we are requesting copies of each of 09:32
the papers that you have published since 09:33
Exhibit 1001 was submitted in IPR 10,819,664 09:33
that relate to your expertise in natural 09:33
language processing. 09:33
MS. NGUYEN: Objection, form. 09:33
Q. Can you identify what those papers 09:33
are on the record? 09:33
A. All of them are on archive.org, and 09:33
searching my name will show my recent papers. 09:33
Q. So when we take a break, if you can 09:33
do that on your phone so you can tell us, that 09:33
would be great. 09:33
A. Tell you what? 09:33
MS. NGUYEN: Objection to form. 09:33
A. I'm sorry, tell you what? I'm 09:33
asking. 09:33
Q. Tell you the papers that you have 09:33
published since you submitted Exhibit 1001 in 09:33
IPR 10 -- I'm sorry, IPR2023-01368 that relate 09:33
to natural language processing. 09:33
A. Yes. 09:33
Q. You understand that natural language 09:33
processing is a skill set that you've identified 09:34

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a person of ordinary skill in the art would need 09:34
for all three IPRs, correct? 09:34
A. Yes. 09:34
Q. Have you published any papers on 09:34
natural language interfaces since you submitted 09:34
Exhibit 1001 in IPR2023-01368? 09:34
MS. NGUYEN: Objection, form. 09:34
A. Natural language interfaces are 09:34
integral to some natural language processing 09:34
systems and not directly. 09:34
Q. Can you explain that? 09:34
I don't quite understand what you 09:34
mean by "integral." 09:34
A. Natural language processing, natural 09:34
language interface, they both have in common 09:34
something called "natural language." So they 09:34
are related. That is all. 09:34
And in that sense, when you talk 09:34
about one, you may use the other. 09:35
And in that sense, like I said, not 09:35
directly -- I did not directly publish something 09:35
on -- specific to natural language interfaces. 09:35
But it's hard to -- for me to tell you whether 09:35
there was anything about natural language 09:35

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interface in there. 09:35

Q. Do you understand that natural 09:35
language interfaces necessarily use natural 09:35
language processing? 09:35

MS. NGUYEN: Objection, form. 09:35

A. No. 09:35

Q. Well, how are they related then? 09:35

A. As I said, they could be used in 09:35
conjunction, but they don't have to be. 09:35

Q. What is the key features that 09:36
define, in your opinion, a natural language 09:36
interface as you would use it in your writings 09:36
on natural language processing? 09:36

MS. NGUYEN: Objection, form. 09:36

A. In my writing in natural language 09:36
processing? 09:36

You're asking for something else in 09:36
light of yet another subject. 09:36

Q. I'm asking -- you've identified that 09:36
you would have used or touched upon, as I 09:36
understand it, the concept of natural language 09:36
interfaces because you're writing on natural 09:36
language processing involving speech 09:36
recognition, right? 09:36

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A. I said not directly. 09:36
Q. Okay. But you said they're related. 09:36
A. They could be. They -- they can be 09:36
related. 09:36
Q. Have you ever in any paper on 09:36
natural language processing ever used the phrase 09:36
"natural language interface," to the best of 09:37
your recollection? 09:37
MS. NGUYEN: Objection, form. 09:37
A. I can't recall because I wasn't 09:37
focused on whether I used something like that. 09:37
Q. Well, you certainly opine on natural 09:37
language interfaces in the context of these 09:37
three IPRs, right? 09:37
A. I do. 09:37
Q. And in that context, did you go back 09:37
and say, Hey, what have I said before about 09:37
natural language interfaces in my writings or 09:37
teachings or correspondence or communications or 09:37
anywhere? 09:37
A. No, I had no reason to do that. I 09:37
have a clear understanding of what natural 09:37
language interface is. I did not need to 09:37
examine, reexamine what I've written in the past 09:37

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about them. My understanding hasn't changed. 09:37
Q. And what is that understanding? 09:37
I want all the elements that are 09:37
necessary to define what a natural language 09:37
interface is under your understanding. 09:37
MS. NGUYEN: Objection, form. 09:37
A. Can you be more specific, in what 09:38
context? 09:38
Q. When you're writing about natural 09:38
language processing as someone of expert -- as 09:38
an expert in the field, what is your 09:38
understanding of the critical elements to define 09:38
something as a natural language interface? 09:38
MS. NGUYEN: Objection, form. 09:38
A. But you are conflating the two 09:38
things. You are conflating natural language 09:38
processing and natural language interface, and 09:38
you're asking me to tell you what natural 09:38
language interface means with regards to natural 09:38
language processing. 09:38
You are conflating the two. 09:38
Q. Well, you've identified that a 09:38
person of ordinary skill in the art would be 09:38
someone who would have experience using natural 09:38

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language processing, correct? 09:38

A. That's correct. 09:38

Q. And so as someone not with -- just 09:38
experience, but a lot of experience, I want to 09:38
understand in the context of your writings on 09:38
natural language processing how you would be 09:39
using the term "natural language interface." 09:39

I'm not conflating them, I'm merely 09:39
applying the standard that you set forth. 09:39

MS. NGUYEN: Objection, form. 09:39

A. A natural language interface would 09:39
be an interface that allows you to pass natural 09:39
language. 09:39

Q. And does that require drawing 09:39
inference of intent or sentiment? 09:39

MS. NGUYEN: Objection, form. 09:39

A. Be more specific, please. What do 09:39
you mean does it -- I mean, why intent or 09:39
sentiment? Can you be more -- 09:39

Q. Well, you're an expert. Do you have 09:39
an understanding of whether a natural language 09:39
interface would require the drawing of an 09:39
inference of intent or sentiment of the other 09:39
person that is interacting with the interface? 09:39

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MS. NGUYEN: Objection, form. 09:39

A. Like I said, natural language 09:39
interface is the interface, which is the 09:40
barrier, the point of communication that allows 09:40
natural language to be passed from one entity to 09:40
another. 09:40

It's an interface for natural 09:40
language. That is all it is. 09:40

I'm not sure how I can answer the 09:40
question you're asking because you're bringing 09:40
in, you know, other subject into the matter. 09:40

It's -- like I said, it's just the 09:40
barrier between two entities or more that would 09:40
be the point of communication of natural 09:40
language. It's an interface where natural 09:40
language can be passed on. That is all it is. 09:40

Q. And does that mean that if I were to 09:40
input into that interface "I want to buy a 09:41
book," is there anything that interface needs to 09:41
do in response to me typing in "I want to buy a 09:41
book" to qualify as a natural language 09:41
interface? 09:41

MS. NGUYEN: Objection, form. 09:41

A. Do you want to give me a context for 09:41

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that? 09:41
Q. I just did. 09:41
I have a natural language interface 09:41
as you understand it as someone of extraordinary 09:41
skill in the art using NLP, and if I type into 09:41
that interface "I want to buy a book," is there 09:41
anything that interface needs to be able to do 09:41
in order to qualify to be a natural language 09:41
interface? 09:41
MS. NGUYEN: Objection, form. 09:41
A. But you are bringing in NLP again. 09:41
Like I said, it's just the point where you 09:41
pass -- so if I say I want to buy a book, the 09:41
interface has done its job if it passes that 09:41
information along to the receiving entity. That 09:41
is the interface. 09:41
It's an interface for passing 09:42
natural language. 09:42
Q. Well, in the '664 patent, it talks 09:42
about natural language input and natural 09:42
language feedback, right? 09:42
In the claims. 09:42
You can look at column 25 around 09:42
line 18 on. 09:43

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A. Now, if you don't mind, since you said the claims, I was looking at the claims. 09:43

Q. That's what I am telling you, column 25 is the claim 1, and I'm telling you that it's around line 18? 09:43

A. I saw the interface. I was looking for -- I'm sorry, I saw the interface and the input. 09:43

You also talked about -- 09:43

Q. So why don't you -- I'm sorry, I'll withdraw the question and rephrase it for you. 09:43

Why don't you read out loud starting at line 15 of column 25 of the '664 patent that we marked as Beigi Exhibit 8 the using element. 09:43

A. Yes. 09:43

"Using a natural language interface, receiving input from a user as part of a natural language conversation between the natural language interface and the user, wherein the natural language conversation comprises a first natural language input from the user, a natural language feedback on the first natural language input from the natural language interface, and a second natural language input from the user in 09:43 09:43 09:43 09:43 09:43 09:43 09:44 09:44

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response to the natural language feedback." 09:44

Q. Okay. Do you understand what that 09:44

using element means? 09:44

A. Yes. 09:44

Q. Okay. And in that using element, it 09:44

starts by saying, "Using a natural language 09:44

interface." 09:44

Correct? 09:44

A. Yes. 09:44

Q. Is that the same term that you 09:44

understand as someone with extraordinary skill 09:44

in the art of NLPs? 09:44

MS. NGUYEN: Objection, form. 09:44

A. Why NLPs again? 09:44

Q. Because that's how you defined the 09:44

person of ordinary skill in the art as having a 09:44

skill set in the area with NLPs, correct? 09:44

A. I understand. Okay. 09:44

Q. So I am trying to understand as 09:44

someone with the skill set of NLPs, how do you 09:44

understand the term "natural language 09:44

interface"? 09:44

A. I understand, yes. 09:44

Yes, natural language interface is 09:44

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in this way -- in this -- the way it's formed 09:45
here the same way as I have an understanding of 09:45
what it is. 09:45
Q. And the way that it is formed here, 09:45
it refers to receiving an input from a user as 09:45
part of a natural language conversation between 09:45
the natural language interface and the user. 09:45
Is that consistent with how you 09:45
understand as someone with skills in NLP of what 09:45
a natural language interface is? 09:45
MS. NGUYEN: Objection, form. 09:45
A. No, because it says, "Using a 09:45
natural language interface, receiving input." 09:45
So receiving input using a natural 09:45
language interface. Like I said, natural 09:45
language interface is the medium, it's the 09:45
barrier, it's the connection point that you're 09:45
using -- as it says, using a natural language 09:45
interface, receiving input from a user as part 09:45
of a natural language conversation between the 09:45
natural language interface and the user. 09:46
Q. So does a natural language interface 09:46
receive input from a user as you understand the 09:46
term "natural language interface" in the context 09:46

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of your expertise with respect to NLP? 09:46

MS. NGUYEN: Objection, form. 09:46

A. You're asking if a user -- I'm 09:46
sorry, ask it again. I've lost that because it 09:46
was pretty long. 09:46

Q. So does a natural language interface 09:46
receive input from the user as you understand 09:46
the term "natural language interface" in the 09:46
context of your expertise with respect to NLP? 09:46

MS. NGUYEN: Same objection. 09:46

A. The natural language interface is 09:46
used to obtain natural language from the user. 09:46
It is the mechanism. It's an interface. 09:47
It's -- it's plain English, interface. 09:47
That's -- no further than that, really. It's 09:47
interface. 09:47

Q. Well -- but an interface does, when 09:47
it on obtains that information, receive it, 09:47
correct? 09:47

MS. NGUYEN: Objection, form. 09:47

A. The natural language interface is 09:47
receiving information from the user by being the 09:47
medium for the receipt. 09:47

Q. And as such, the natural language 09:47

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interface receives input from the user as part 09:47
of a natural language conversation between the 09:47
natural language interface and the user, 09:47
correct? 09:47
A. In this context, yes. But natural 09:47
language interface is being used to receive the 09:47
input from a user as -- as is stated in this 09:47
claim. 09:48
In this context, natural language 09:48
interface is being used to be able to receive 09:48
input from a user as part of a natural language 09:48
conversation. 09:48
Q. And part of the way it's being used 09:48
is the interface itself receives that input, 09:48
correct? 09:48
A. Yes. 09:48
Q. And that input is part of a natural 09:48
language conversation, correct? 09:48
A. In this context, it is. 09:48
Q. And what is a natural language 09:48
conversation in this context with respect to a 09:48
natural language interface? 09:48
MS. NGUYEN: Objection, form. 09:48
A. A natural language conversation in 09:48

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this context is the conversation which utilizes 09:48
the natural language interface for transmitting 09:48
natural language. 09:48
Q. And it's not just any conversation, 09:49
it's a natural language conversation? 09:49
A. Yes. 09:49
Q. And how does a natural language 09:49
conversation differ from a conversation? 09:49
MS. NGUYEN: Objection, form. 09:49
Q. As someone that has the skill set of 09:49
NLP like you have identified a POSA would have. 09:49
A. A natural language conversation is a 09:49
conversation that utilizes natural language. 09:49
We have to be careful because 09:49
sometimes in normal conversation, you may use it 09:49
with just plain, say, conversation. 09:49
But in this context, natural 09:49
language conversation specifically says that 09:49
there is natural language involved in the 09:49
conversation. 09:49
Q. And how is natural language involved 09:49
in the conversation -- 09:50
MS. NGUYEN: Objection. 09:50
Q. -- in the context of the natural 09:50

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language interface and your understanding as 09:50
someone with experience in NLP? 09:50
MS. NGUYEN: Same objection. 09:50
A. In the context of this claim and 09:50
this patent, natural language conversation is 09:50
the passing back and forth conversation back and 09:50
forth of natural language through the interface. 09:50
It does involve a user based on this 09:50
claim, and I would surmise that based on this 09:50
claim, it involves a machine. 09:50
Q. Okay. 09:50
And how do you surmise that the 09:50
machine is being involved? 09:50
I'm not asking you how you draw the 09:50
surmising, I'm asking what's the role of the 09:50
machine under your assumptions or your 09:50
understanding? 09:51
MS. NGUYEN: Objection, form. 09:51
Q. Let me rephrase that. 09:51
You said you surmised that the 09:51
natural language conversation that is involved 09:51
in claim 1 involves both a user and a machine, 09:51
correct? 09:51
A. Yes. 09:51

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Q. Because you can't have a conversation with only one side, correct? 09:51

A. That's one of the reasons. 09:51

MS. NGUYEN: Objection, form. 09:51

A. That's one of the reasons. 09:51

Q. Right. And the other reason is it didn't identify who the other side was? 09:51

A. In the first part of claim doesn't. That's why I surmised because it continues and does talk about a computer program. 09:51

Q. Okay. 09:51

So you understand that this claim is requiring a natural language interface that has a natural language conversation that is between a user and some sort of computer or software, correct? 09:51

A. Yes. 09:51

Q. And that the natural language conversation is something more than merely a conversation. 09:51

MS. NGUYEN: Objection, form. 09:52

A. I wouldn't say it's more than a conversation. I would say it's a conversation involving natural language. 09:52

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Q. Well, if we struck out the words "natural language" from the claim before the word "conversation," would it change your understanding of the claim? 09:52

MS. NGUYEN: Objection, form. 09:52

A. It -- in this context, the specifications become important as well. So like I said, conversations sometime is used without qualifying natural language. 09:52

So based on the specifications in this context, again, there is other -- there are, you know, references to natural language. 09:52

Q. Okay. I'm going to go back and ask you the question again. 09:52

A. Yes. 09:52

Q. In the context of the '664 patent as you've been applying it in the IPR2023-01368, if claim 1 had not said, "a natural language conversation," on line 16 of column 25, but instead said, "a conversation," would it change at all in your opinion the scope of the claim? 09:52

MS. NGUYEN: Objection, form. 09:53

A. There are many places where natural language is used in this claim. And it probably 09:53

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wouldn't change it much. 09:53

Q. Again, I want to know, does it add 09:53
any meaning to the claim that it says, "a 09:53
natural language conversation," instead of "a 09:53
conversation" at line 16 of column 24 of the 09:53
'664 patent that we have marked as Beigi 09:53
Exhibit 8, in your opinion as a person who is 09:53
interpreting what a person of ordinary skill in 09:54
the art with experience in NLP understands? 09:54

MS. NGUYEN: Objection, form. 09:54

A. Just using "conversation" would need 09:54
more context in terms of defining what sort of 09:54
conversation, possibly in the specifications, 09:54
and so it could very well be, like I said, that 09:54
it wouldn't change it depending on the context. 09:54

Saying "natural language 09:54
conversation" just is more specific and, 09:54
therefore, it clarifies things, and I think 09:54
that's probably why it's there. 09:54

Q. Okay. So in your opinion, what 09:54
would a POSITA with experience in NLP understand 09:54
the difference that is being clarified by using 09:54
the words "natural language conversation" 09:54
instead of merely using the word "conversation" 09:54

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in claim 1 of the '664 patent? 09:54

MS. NGUYEN: Objection, form. 09:54

A. I would have to see the conversation 09:55
that they would refer to if they didn't say 09:55
"natural language conversation" because de 09:55
facto, when we speak about conversation, because 09:55
conversing is an English language word and it 09:55
means to converse, to send human speech back and 09:55
forth. 09:55

And in that sense, that's why I said 09:55
it probably wouldn't change the meaning much, 09:55
and I would have to see what they would have 09:55
defined their conversation as in that context. 09:55

That's a hypothetical. Here, they 09:55
have said natural language conversation. 09:55

So whatever conclusion I make would 09:55
be a very hypothetical conclusion because I 09:55
don't know what they would have defined the 09:55
conversation as in that scope. 09:55

Q. Okay. If I were having an interface 09:56
where I'm programming a computer using command 09:56
lines back in 1975, and I typed a command in 09:56
like input data field A, or -- let me rephrase 09:56
that. 09:56

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If I am back in 1975 and I am 09:56
programming a computer using command lines, and 09:56
I type a command in to the computer and then the 09:56
computer responds to that command, assuming we 09:56
are using BASIC programming language at the 09:56
time, would that be a natural language 09:56
conversation? 09:56
MS. NGUYEN: Objection, form. 09:56
A. You -- by "BASIC programming 09:57
language," are you talking about capital B 09:57
BASIC? 09:57
Q. Yes. 09:57
A. The language BASIC -- 09:57
Q. Yes. 09:57
A. -- or not a basic -- 09:57
Q. You can pick any programming 09:57
language you want. I know back then, they were 09:57
using BASIC because that's what I used to use. 09:57
A. No, I can't pick any programming 09:57
language because you could have a conversational 09:57
language, and in '75 -- did you say '75? 09:57
Q. Yes. 09:57
A. In 1975, we are already more than a 09:57
decade into the establishment of the touring 09:57

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test, and people were working on creating 09:57
systems that would be able to converse between a 09:57
user and a machine in natural language form. 09:57
So even then, just by saying any 09:57
language -- any programming language, I don't 09:57
think it would be fair because it wouldn't cover 09:57
ever possible case, scenario. 09:58
The capital B BASIC that you were 09:58
using in the 1970s as a programming language, 09:58
then that would have been -- it would be another 09:58
language, it wouldn't be natural language, it 09:58
would be a programming language which had its 09:58
own grammar. 09:58
Q. So in your opinion, programming in 09:58
BASIC language through an interface would be 09:58
using a natural language interface with a 09:58
natural language conversation or not? 09:58
MS. NGUYEN: Objection, form. 09:58
A. In capital B BASIC, the language 09:58
BASIC, not any basic program language, in the 09:58
programming language called "BASIC," you would 09:58
be communicating your instructions to the 09:58
machine using the grammar and the keywords, just 09:59
like our language has but its own grammar and 09:59

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its own keywords or words, and you would be 09:59
communicating your information to the computer. 09:59
Q. Okay. But not using natural 09:59
language? 09:59
A. So when you say, "natural language," 09:59
we mean human languages. 09:59
Q. That's your -- that's your 09:59
construction for purposes of the '664 patent 09:59
with experience in NLP -- 09:59
MS. NGUYEN: Objection, form. 09:59
Q. -- is that correct? 09:59
A. So natural language would be the 09:59
type of language that we are using in our 09:59
conversation. Any one of those languages, of 09:59
course. They're not limited to English but a 09:59
language that humans use for communication. 09:59
Q. In contrast to a language that is 09:59
being used for programming like BASIC with a 09:59
capital B? 09:59
MS. NGUYEN: Objection, form. 09:59
A. So BASIC with a capital B is a 10:00
programming language, which when we say, 10:00
"natural language," we mean languages that 10:00
develop naturally by humans. 10:00

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Q. In contrast to a programming 10:00
language like BASIC with a capital B, correct? 10:00
A. Which was created artificially, yes. 10:00
Q. Now, the interface in claim 1 10:00
requires not only that there be a natural 10:00
language conversation between the natural 10:00
language interface and the user but that there 10:00
be specific aspects of what's included in the 10:00
natural language conversation, correct? 10:00
MS. NGUYEN: Objection, form. 10:00
A. Can you give me examples of what you 10:01
mean by -- 10:01
Q. What is -- the next clause says, 10:01
"wherein the natural language conversation 10:01
comprises," and it lists element of the 10:01
conversation, correct? 10:01
A. It says it "comprises a first 10:01
natural language input" -- still a natural 10:01
language -- "from the user, a natural language 10:01
feedback on the first natural language input 10:01
from the natural language interface, and a 10:01
second natural language input from the user in 10:01
response to the natural feedback." 10:01
So there is natural language going 10:01

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in, natural language coming back and natural 10:01
language going in. 10:01
Q. And that would be your understanding 10:01
of what a natural language conversation is, 10:01
right? 10:01
MS. NGUYEN: Objection, form. 10:01
A. That's the type of conversation. 10:01
Q. I want to know is it your 10:01
understanding of what a natural language 10:01
conversation that is being used in the context 10:02
of a natural language interface based upon your 10:02
understanding as someone with experience in NLP? 10:02
MS. NGUYEN: Objection, form. 10:02
A. A natural language conversation uses 10:02
natural language interface to pass natural 10:02
language back and forth or, you know, in some 10:02
simple cases in one direction, depending on the 10:02
context, of course. 10:02
Q. In the context of the '664 patent, 10:02
can it only be one direction? 10:02
A. In the context -- 10:02
MS. NGUYEN: Objection, form. 10:02
A. In the context of a claim, it says, 10:02
"a first natural language input from the user 10:02

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and "a natural language feedback on the first 10:02
natural language input." 10:02
So right there, we have two, so 10:02
there is the two natural language excerpts back 10:03
and forth. 10:03
Q. So it isn't enough for the natural 10:03
language conversation to have merely an input 10:03
and feedback but it must have a natural language 10:03
input, the first natural language input, and a 10:03
natural language feedback, is that correct? 10:03
MS. NGUYEN: Objection, form. 10:03
A. The conversation in this context is 10:03
asking for this type of information in the form 10:03
of natural language being passed back and forth. 10:03
Q. Is there any natural language input 10:03
that receives input from the user as part of the 10:03
natural language conversation between a natural 10:03
language interface and a user that you are aware 10:03
of that would not have a natural language input 10:04
with a natural language feedback in response to 10:04
that input? 10:04
MS. NGUYEN: Objection, form. 10:04
A. Can you be more specific? Just a 10:04
little bit -- narrow it down a little bit so 10:04

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that I can understand the exact question? 10:04
So the -- you're -- you're saying 10:04
that there is -- I just want to understand the 10:04
directions, right? 10:04
Q. Explain to me what you're not 10:04
understanding because I can't be more specific 10:04
than what I was. 10:04
MS. NGUYEN: Same objection. 10:04
A. You're saying natural language goes 10:04
in from the user to the machine? 10:04
That's -- I didn't understand the 10:04
directions. Can you explain? 10:04
Q. You have a natural language 10:04
interface which receives input from a user as 10:04
part of a natural language conversation between 10:04
the natural language interface and the user, 10:04
right? 10:04
A. Yes. 10:04
Q. Can you ever have that met without 10:04
the conversation including a first natural 10:05
language input and, in response to that first 10:05
natural language input, a natural language 10:05
feedback? 10:05
MS. NGUYEN: Objection, form. 10:05

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A. And we are talking about the limitation of the conversation, not the interface, right? 10:05

Q. We are talking about a natural language interface receiving input from a user as part of a natural language conversation between the natural language interface and the user. 10:05

Can that exist where the conversation does not include a first natural language input from the user and, in response to that first natural language input from the user, a natural language feedback? 10:05

MS. NGUYEN: Objection, form. 10:05

A. The natural language interface, like I said, has only the limitation that it has to pass that special language. 10:06

The direction doesn't matter. It doesn't have to portable. So I just want to make sure that that is clear. 10:06

The conversation part, which is defined now using this interface, conversation, I can think of examples where you would have a simple conversation where you would have some 10:06

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input from the user and a natural language 10:06
coming back or vice versa. 10:06
Conversation in the sense that it 10:06
would -- by -- because depending on what the 10:06
context is and what the machine is supposed to 10:06
do, your conversation may basically be short of 10:06
the complete conversation because it may end up 10:07
doing something. 10:07
So there are cases where it could 10:07
start out as conversation -- think of a parent 10:07
scolding a child who had just run away and then 10:07
hide. That's to the conversation, not -- it 10:07
didn't completely form because something 10:07
happened after that, some request, which may be 10:07
natural language, which goes to the natural 10:07
language interface. 10:07
And what is produced, if it's the 10:07
outcome that is requested by that natural 10:07
language, that's one possibility that is sort of 10:07
a shorthand conversation. 10:07
And by conversation -- because now 10:07
there is feedback. And it still has natural 10:07
language conversation because one -- at least 10:08
one side was a natural language. 10:08

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So in that sense, I can think of 10:08
examples where you haven't -- you still have to 10:08
call that natural language conversation because 10:08
there was natural language involved and it was 10:08
conversation. 10:08
Q. Is it a conversation if there is no 10:08
response? 10:08
MS. NGUYEN: Objection, form. 10:08
A. I didn't say there was no response. 10:08
Q. That wasn't my question. 10:08
I asked you, is it a conversation if 10:08
there was no response? 10:08
MS. NGUYEN: Same objection. 10:08
A. Are you qualifying the response as 10:08
no response means there is no answer, talking to 10:08
the wall basically? Is that an example? 10:08
Q. Is a monologue a conversation? 10:08
A. I don't want to become 10:08
philosophical, but a monologue is -- could be a 10:09
conversation because you wouldn't waste your 10:09
words. You're actually saying it to yourself. 10:09
Like I said, I don't want to become 10:09
philosophical. We want to stick to this 10:09
context. 10:09

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But a monologue can philosophically be a conversation with self -- 10:09

Q. Okay. 10:09

A. -- because you're thinking back and you're talking to yourself. 10:09

So that thinking itself is answering in response. So that's -- that's very good example, by the way. Thank you. 10:09

Q. So is -- if you type in a monologue into an interface, is that a natural language conversation between the interface and the user if there is no response? 10:09

MS. NGUYEN: Objection, form. 10:09

A. You are familiar with the LAN technology, large language model technologies. If you asked one to create a conversation for you, it creates a conversation, and it can create a conversation in natural language between two parties, and it can produce it to you. 10:10

So there is a -- you can have a conversation through a natural language interface where only one party is really driving the conversation. 10:10

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That's why I don't want to be so 10:10
specific -- that's why I am asking for context. 10:10
When you're saying this is a very blanket -- 10:10
whether we can have a conversation when there is 10:10
only one party involved or one -- I, you know, 10:10
just want to be clear in my response. 10:10
Q. You said it can create a 10:10
conversation in natural language between two 10:10
parties. 10:10
But that conversation still has to 10:10
have each party represented with its statement 10:10
and response, right? 10:10
MS. NGUYEN: Objection, form. 10:11
A. But the conversation is being 10:11
produced by the same entity. So it's like the 10:11
monologue type of -- so it's answering itself. 10:11
So it can produce some language -- 10:11
natural language and it can then respond to its 10:11
natural language. 10:11
What is the meaning of life? And it 10:11
may ask a bunch of questions and respond to 10:11
them. In that sense, you can have a 10:11
conversation created by one entity. It is a 10:11
conversation. 10:11

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So that's why I said, let's stick to 10:11
this specific context. In this specific 10:11
context, we are talking about the user and 10:11
machine natural language conversation where, as 10:11
they specify, there is one natural language 10:11
statement being sent in from the user to the 10:11
machine, again, surmising based on the rest of 10:12
the claim, and then a response is made in 10:12
natural language and the feedback is the 10:12
response. 10:12

And the user responds to the natural 10:12
language feedback. It doesn't say how. But the 10:12
user responds to the natural language feedback, 10:12
and they use -- "they" meaning the machine and 10:12
the user use the natural language interface for 10:12
that give and take, for that back and forth. 10:12

Q. And in your example of a 10:12
conversation generated by LLM where the 10:12
conversation is between two fictional parties, 10:12
it is not a conversation between the user and 10:12
the natural language interface, correct? 10:12

MS. NGUYEN: Objection, form. 10:12

A. The -- so here is -- again, the 10:13
natural language interface is being used for 10:13

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passing the medium of natural language speaking 10:13
back and forth. 10:13
So the conversation is the part that 10:13
is taking place between the two parties, not the 10:13
interface. I just -- let's be clear about that. 10:13
Q. That's what I said. 10:13
A. Okay. 10:13
Q. And the conversation that you have 10:13
generated by the LLM in your example is between 10:13
two fictional parties, not between the user and 10:13
the natural language interface, correct? 10:13
A. Yes. That's another kind of 10:13
conversation. 10:13
You are asking about different 10:13
conversations -- 10:13
Q. No -- 10:13
A. Yes. 10:13
Q. -- I wasn't. I was asking about 10:13
whether the front part of the claim implies the 10:13
second part of the claim. 10:13
So the front part of the claim says 10:13
that you're using natural language interface, 10:13
receiving input from a user as part of a natural 10:13
language conversation between the natural 10:14

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language interface and the user. 10:14

And I want to know if that implies 10:14

that the natural language conversation will 10:14

include a first natural language input from the 10:14

user as well as a natural language feedback on 10:14

the first natural language input from the 10:14

natural language interface? 10:14

A. That is specifically what it is 10:14

saying, yes, it does. 10:14

Q. I know that's what the claim says. 10:14

I'm trying to understand from you 10:14

whether it would inherently be met that if you 10:14

have a natural language interface receiving 10:14

input from the user as part of a natural 10:14

language conversation between the first natural 10:14

language interface and the user, that such a 10:14

conversation would include the user inputting 10:14

something and the machine responding with 10:14

feedback. 10:14

MS. NGUYEN: Object to form. 10:14

A. Well, the conversation can be 10:14

started by the machine. That's another 10:15

scenario. Where, in this case, the user is 10:15

starting the conversation. 10:15

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The machine could be starting the 10:15
conversation. You're asking for another way. 10:15
And then the user can respond. 10:15
That's another possibility. 10:15
Q. And if the machine didn't respond 10:15
back to the user, would it still be a natural 10:15
language conversation? 10:15
MS. NGUYEN: Objection, form. 10:15
A. If the machine produced natural 10:15
language -- it requires that natural language be 10:15
used. As long as the conversation and as long 10:15
as natural language is being used, it is a 10:15
natural language conversation. 10:15
Because there is no other carved-out 10:15
version of this where we can say to have 10:15
conversation or -- it's a conversation, I could 10:15
use a natural language, then it's a natural 10:15
language conversation. 10:15
MS. NGUYEN: Counsel, can we take a 10:15
break? 10:16
MR. MACEDO: As soon as I am done 10:16
with this line shortly. 10:16
Q. And when you have a natural language 10:16
input and a natural language feedback, does that 10:16

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require that the feedback be in the form of natural language? 10:16

A. Yes, because it says natural language feedback. 10:16

Q. And you told me that using a form was not a form of natural language interface, correct? 10:16

A. Using the word "form" in two places. Can I ask you -- 10:16

Q. Using the form -- 10:16

A. The word "form," you're using it in two different meanings in the same sentence, and I would like to ask you to rephrase so that you would ask more -- 10:16

Q. I used "form" once -- I'm sorry. Okay. 10:16

You told me that to the extent that an interface presents a form that is not using natural -- that is not part of a natural language conversation, is that correct? 10:16 10:17

MS. NGUYEN: Objection, form. 10:17

A. By "form," we mean the standard form where you fill out? 10:17

Q. What is the title, and you input 10:17

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"What is the title" using the dialogue box. 10:17

MS. NGUYEN: Same objection. 10:17

A. If you enter "natural language" in 10:17
that field of the form, and it is a natural 10:17
language interface, then it could be a natural 10:17
language conversation. 10:17

Q. So in contrast to your prior 10:17
testimony where you were saying that entering 10:17
information into a form was not natural 10:17
language, you are now saying it is, is that 10:17
correct? 10:17

MS. NGUYEN: Objection, form. 10:17

A. That's not true. I believe, and 10:17
like I said, that testimony was 10:17
mischaracterized. 10:17

If you could please point me to 10:17
that, I will explain. 10:18

Q. You have your report. You can do 10:18
whatever you need to to answer my question. 10:18

A. I was talking about my testimony on 10:18
the last deposition. 10:18

Q. Yeah, you have the deposition. You 10:18
have your report. Feel free to look wherever 10:18
you want. 10:18

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I can give you your original report, if you want. 10:18

A. It was part of my deposition from last time, what you just -- 10:18

Q. Your statement that it was mischaracterized was, I believe, in your expert report. 10:18

A. Yes. 10:18

Q. So you have your expert report in front of you. 10:18

You wrote your expert report, right? 10:18

A. Yes. 10:18

Q. And it was you that identified that it was mischaracterized, not counsel, right? 10:18

MS. NGUYEN: Objection, form. 10:18

A. Yes. 10:18

MR. MACEDO: Counsel, I know you want to take a break. I'm happy to withdraw the question, let him look at it over the record -- over the break, if he wants, as long as he knows that he is not conferring with you, and then when we come back, I'll restate the question. 10:18 10:18 10:18 10:19 10:19

MS. NGUYEN: Well, he should spend 10:19

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the time during the break taking a break. 10:19

MR. MACEDO: He can do whatever he 10:19

wants but -- 10:19

MS. NGUYEN: He can continue looking 10:19

at it when the break -- when we resume. 10:19

Let's take a break. 10:19

MR. MACEDO: Well, I'm going to take 10:19

the break at your request. I mean, we 10:19

haven't -- we've barely been going an 10:19

hour, but -- 10:19

MS. NGUYEN: We have been going more 10:19

than an hour. 10:19

MR. MACEDO: It's 10:19 -- 10:19

MS. NGUYEN: Right. 10:19

MR. MACEDO: -- and we started -- 10:19

MS. NGUYEN: 9:08. 10:19

MR. MACEDO: Okay. I said barely 10:19

more than an hour. Let's -- 10:19

MS. NGUYEN: You said barely an 10:19

hour. That means less than an hour. 10:19

MR. MACEDO: Counsel, please -- 10:19

MS. NGUYEN: Take a break. 10:19

MR. MACEDO: -- you are wasting our 10:19

time. 10:19

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Q. Dr. Beigi, you are welcome to look 10:19
or not as your heart desires during the break. 10:19
We're going to reconvene at 10:30, which is 10:19
11 minutes from now. 10:19
And I would like everyone to be 10:19
ready to start then. I would like not to waste 10:19
time on the break more than that. 10:19
And I'm going to be asking you the 10:19
same question we just did right now, so feel 10:19
free to look at anything you want or not as your 10:19
heart desires. 10:20
Thank you. 10:20
A. Thank you. 10:20
Q. I also remind the witness not to 10:20
confer with counsel at all during any of the 10:20
breaks or between today and tomorrow, if we 10:20
continue beyond today. 10:20
A. I understand. 10:20
Q. Thank you. 10:20
(Recess.) 10:20
BY MR. MACEDO: 10:32
Q. Are you ready, Dr. Beigi? 10:32
A. Yes. 10:32
Q. Can you turn to page 36 of Beigi 10:32

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Exhibit 27. 10:33

A. What page again? Sorry. 10:33

Q. 36. 10:33

36. No -- 10:33

A. That's page 36 of exhibit -- 10:33

Q. No, page 45 of the exhibit, page 36 10:33
of your report. 10:33

Okay. Are you there? 10:33

A. Yes. 10:33

Q. Do you see at the top of page 36, 10:33
there is a label "Symons" and a black box around 10:33
a form. 10:33

Yes or no? 10:33

A. Yes -- 10:33

MS. NGUYEN: Objection, form. 10:33

A. -- Symons and a black box around an 10:33
input. 10:33

Q. Is that a dialogue box? Is that a 10:33
form? What is that? 10:34

Inside the black box. 10:34

MS. NGUYEN: Objection, form. 10:34

A. That's a dialogue box. 10:34

Q. A dialogue box. 10:34

A. Yes. 10:34

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Q. And in that dialogue box, there is 10:34
an English language question with two buttons, 10:34
correct? 10:34
A. Yes. 10:34
Q. And the two buttons give the choice 10:34
of "yes" or "no." 10:34
A. Yes. 10:34
Q. And "yes" is an English language 10:34
word? 10:34
A. Yes. 10:34
Q. And "no" is an English language 10:34
word? 10:34
A. It is. 10:34
Q. Is that a natural language 10:34
conversation, that content inside the dialogue 10:34
box that's within the black box on page 36 of 10:34
Beigi Exhibit 27? 10:34
MS. NGUYEN: Objection, form. 10:34
A. In this context, it is. Because it 10:34
is part of the Symons exhibit where -- the top 10:34
of the window is missing here, but on the top of 10:34
the window is talking about a chat box, which is 10:35
why in this context of the chatbot, it is a -- 10:35
it is an English -- it's a natural language 10:35

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interface. 10:35

Q. Even though it is posing a form with buttons? 10:35

A. That's a convenience form. It's still a natural language. Like you said, "yes" and "no" are words in the natural language. 10:35

Q. Is "print" a word in the natural language? 10:35

A. The word "print"? 10:35

Q. Yes. 10:35

MS. NGUYEN: Objection, form. 10:35

A. The word "print" is a word in the natural language of English, yes. 10:35

Q. Are "if" and "then" words in the natural language? 10:35

A. They happen to be common in a bunch of languages, including natural language and artificial languages, such as programming languages. 10:35

Q. And when "if," "then" and "yes" are used in a program -- I'm sorry, strike that. 10:35

When "if," "then" or "print" are used in a programming language, does it become a natural language? 10:36

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MS. NGUYEN: Objection, form. 10:36

A. Is it the natural programming 10:36
language or is it an artificial programming 10:36
language? 10:36

Q. Let's use BASIC with a capital B. 10:36
Those are commands that are used in BASIC with a 10:36
capital B, right, the words "if," "then" and 10:36
"print"? 10:36

A. "If" and "then" are keywords and 10:36
"print" is a command -- 10:36

Q. And -- 10:36

A. -- is a function. 10:36

Q. And they are part of the programming 10:36
language used with BASIC in capital B, like we 10:36
were discussing earlier? 10:36

MS. NGUYEN: Objection, form. 10:36

A. Those words are common to English 10:36
and BASIC. 10:36

Q. And when they are used in the 10:36
context of programming using BASIC language, 10:36
does BASIC become natural language interface? 10:36

A. No. 10:37

Q. Does it become a natural language 10:37
conversation? 10:37

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MS. NGUYEN: Objection, form. 10:37

A. It can be. 10:37

I can elaborate, if you would like 10:37
to, but it can be. It's possible. 10:37

Q. No, I'm asking very simple 10:37
questions. I'm happy for you to say, "yes," 10:37
"no," "I don't know," "I can't answer" in 10:37
response to my questions. 10:37

I'm just trying to understand what 10:37
your opinion is, and if I need you to elaborate, 10:37
I'm more than happy to ask you to elaborate. 10:37

A. So yes, it can be. We have created 10:37
with one of my students a method of writing C 10:37
code using speech by conversing to the machine 10:37
and having it generate the sequence. 10:37

That's still natural language in 10:37
conversation and it uses natural language 10:37
conversation and it also uses natural language 10:37
processing and it generates C code, which is a 10:38
programming language. 10:38

So you can still have natural 10:38
language conversation. 10:38

Q. You're saying because you use some 10:38
sort of generative form of AI and the output 10:38

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includes a conversation, that that's a 10:38
conversation? Is that what you are saying? 10:38
MS. NGUYEN: Objection, form. 10:38
A. I did not use the word "generative." 10:38
This is not generative. It's where you dictate 10:38
the language by using human conversation. 10:38
So I dictate instead of typing in 10:38
the C keywords. I dictate the program. 10:38
Q. Because the conversation you're 10:38
having is saying the programming language, it 10:38
doesn't make the programming language 10:38
conversational. 10:38
A. That's not true because the 10:38
programming language will be part of the 10:38
conversation and then it becomes natural 10:39
language. 10:39
Q. But it's not the -- it's not the 10:39
interface interacting in the programming 10:39
language that makes it part of the natural 10:39
language. It's because if I said, "gibberish," 10:39
gibberish becomes part of my natural language 10:39
because I said it. 10:39
That's the context of which you are 10:39
making those words part of the programming 10:39

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language or part of the natural language. 10:39

MS. NGUYEN: Objection, form. 10:39

A. I'm sorry? 10:39

Q. You're not saying that dictating 10:39

the -- you're saying because you dictate 10:39

something, whatever you're dictating is part of 10:39

the natural language. You're not saying that 10:39

programming in BASIC with the capital B is 10:39

communicating in natural language. 10:39

MS. NGUYEN: Objection, form. 10:39

A. That is not what I am saying. 10:39

What I am saying is that you can -- 10:39

not generatively, but you can program using a 10:39

combination of natural language and the keywords 10:40

of a language combined and that will still be 10:40

natural language. 10:40

I'll give you an example. The court 10:40

reporter is kindly typing whatever I say. If I 10:40

give specific instructions on go to the next 10:40

line and type "if," put a space, open 10:40

parentheses and then type the following 10:40

statement, close parentheses, this is natural 10:40

language interface being used and natural 10:40

language conversation and there is natural 10:40

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language processing in this example. 10:40
So just merely the fact that the 10:40
words are used were part of the programming 10:40
language doesn't make it not a natural language. 10:40
Q. So under your understanding of the 10:40
claimed language based upon your training in 10:41
NLP, you understand that I am using a natural 10:41
language interface being the court reporter 10:41
because she is receiving input from a user, 10:41
which would be me asking you questions, as part 10:41
of a natural language conversation because we 10:41
are speaking in English, which has grammar, 10:41
between the natural language interface, the 10:41
court reporter and the user. 10:41
Is that what you are saying? 10:41
MS. NGUYEN: Objection, form. 10:41
A. Using the natural language 10:41
interface, I, the user, am communicating with 10:41
the court reporter through natural language 10:41
because I am using a natural language interface 10:41
and I am producing natural language, and if she 10:41
doesn't hear something correctly, she is going 10:41
to ask me to speak louder or more clearly, and 10:41
that is conversation. 10:41

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But for the time that she is typing what I say, the conversation still is going on. 10:41 10:41

Q. So your understanding with all of your expertise in NLP experience is that the court reporter is the natural language interface in this room. 10:42 10:42 10:42 10:42

A. No. 10:42

MS. NGUYEN: Objection, form. 10:42

Q. She is a portal that is receiving the conversation, and she would respond to your statement that she could not hear you -- 10:42 10:42 10:42

A. No -- 10:42

Q. -- doesn't that make her the natural language interface as you have defined it in this context? 10:42 10:42 10:42

MS. NGUYEN: Objection, form. 10:42

A. No. Being a human, her interface is her ears and her brain, and that's how interface with the court reporter. 10:42 10:42 10:42

We were talking about the user and the machine. So if you replace the court reporter with a machine, then, of course, things change. So you can still have natural language interface being the interface between the two. 10:42 10:42 10:42 10:42 10:42

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In this case, we don't need any 10:43
artificial natural language interface because 10:43
the court reporter is equipped with the ear and 10:43
language processing. 10:43
Q. So in 2017, when the Symons 10:43
demonstration was created, and Word had the 10:43
email copied into it on Mr. Symons' copy of -- 10:43
or Mr. Symons -- on Symons -- Symons copy of 10:43
Word had pasted into it the email signature. 10:43
Did you understand that Word was a 10:43
natural language interface? 10:43
MS. NGUYEN: Objection, form. 10:43
A. By "Word," you mean -- 10:43
Q. Software program that was called 10:43
"Word" -- 10:43
A. Microsoft. 10:43
Q. -- Microsoft Word that you saw in 10:43
the demonstration. 10:44
A. Microsoft Office Word. Microsoft 10:44
Office Word, and you're asking? 10:44
Q. Well, in that demonstration, there 10:44
was a version of Word that belonged to 10:44
Mr. Symons which had the -- in the human 10:44
language of his email signature pasted into it. 10:44

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Was that a natural language interface according to your understanding of someone with training in NLP? 10:44

MS. NGUYEN: Objection, form. 10:44

A. The natural language interface is the interface that allows you to communicate using natural language. 10:44

So the chatbot that Mr. Symons and Baetens used is the natural language interface. The -- and the submission and all that happens and then basically, it is copied into a Microsoft Word document. 10:44 10:45

So I'm not sure by copying being an interface what you mean. 10:45

Q. I'm going to ask the question again, and I would like for you to answer "yes," "no," "I don't know" or "I can't answer." 10:45

Was the Word that was used -- the Word -- Microsoft Word program that was used in the demonstration to paste the signature that was generated a natural language interface as you understand it with your training in NLP in the context of the '664 patent? 10:45

MS. NGUYEN: Objection, form. 10:45

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Counsel, please let the witness 10:45
answer how he wishes. 10:45
A. I can't tell with the information 10:45
I'm given. 10:46
Q. Okay. 10:46
You talked about a natural language 10:46
conversation as having grammar. 10:46
MS. NGUYEN: Objection, form. 10:46
A. I talked about natural language 10:46
having grammar, not natural language 10:46
conversation having grammar. 10:46
Q. Well, does a natural language 10:46
conversation need to have an understanding 10:46
somehow of grammar in order to qualify as a 10:46
natural language conversation as someone of 10:46
skill in the art of NLP reading the '664 patent? 10:46
MS. NGUYEN: Objection, form. 10:46
A. The natural language, which is the 10:46
constituent part of the conversation, has the 10:46
grammar, the natural language, and it has the 10:46
grammar to facilitate the conversation. 10:46
I hope that answers your question to 10:47
be specific. 10:47
Q. So in order to facilitate the 10:47

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conversation, that would include generating the 10:47
natural language feedback on the first natural 10:47
language input as required in claim 1 of the 10:47
'664, correct? 10:47
MS. NGUYEN: Objection, form. 10:47
A. Ask that again. Sorry. 10:47
Q. So in order to facilitate the 10:47
conversation, that would include generating the 10:47
natural language feedback on the first natural 10:47
language input as required in claim 1 of the 10:47
'664, correct? 10:47
A. What's the question? 10:47
Q. That was the question. 10:47
A. You just gave me the last part. 10:47
MS. NGUYEN: Same objection. 10:47
A. Actually, the full question, If you 10:47
don't mind? 10:47
Q. That is literally the full question. 10:47
THE WITNESS: Would the court 10:47
reporter mind reading the whole question 10:47
to me, please. 10:47
(Record read.) 10:48
A. Yes. 10:48
MR. MACEDO: Can we go off for one 10:48

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second? 10:48

(Pause.) 10:48

MR. MACEDO: So we can go back on 10:49

the record. 10:49

Q. So in order to generate the natural 10:49

language feedback, does whatever is generating 10:49

the conversation need to have an understanding 10:49

of grammar? 10:49

MS. NGUYEN: Objection, form. 10:49

A. Understanding of grammar is a -- I 10:49

think a too wide a requirement. As long as it 10:49

can produce language or to be able to -- so 10:49

doing a processing of the language so that it 10:49

mimics natural language and is understandable to 10:49

the other side because of feedback, that's the 10:50

only requirement. 10:50

It doesn't necessarily have to 10:50

understand the grammar the way we do, but it has 10:50

to have a way of communicating back so that the 10:50

user understands and so that it also 10:50

understands. 10:50

So there is the input and then there 10:50

is the feedback. So the natural language 10:50

processing is utilized to make some such 10:50

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feedback for -- to understand the input. 10:50

Q. If all I had was a dialogue box 10:50
saying, "Do you allow Microsoft Office to copy 10:50
this data," with a button saying "Yes" or "no," 10:51
and there is nothing else but that dialogue box, 10:51
is that a natural language interface? 10:51

MS. NGUYEN: Objection, form. 10:51

A. So you are making a hypothetical 10:51
example because that's not any one of the cases 10:51
that we've seen. But you are making a single 10:51
hypothetical example where you only have this 10:51
one dialogue box and it has a form of natural 10:51
language as the question, and the answer is 10:51
"yes" or "no," did you say? 10:51

Q. Every question I ask stands and 10:51
rises on its own. 10:51

And the question I asked is, if all 10:51
you had was a dialogue box saying, "Do you allow 10:51
Microsoft Office to copy this data," with a 10:51
button saying "Yes" or "No," and there is 10:51
nothing else but that dialogue box, is that a 10:51
natural language interface? 10:52

MS. NGUYEN: Same objection. 10:52

A. It can be viewed as a natural 10:52

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language interface, yes, because it is 10:52
transmitting natural language. 10:52
Q. If you have a conversation where the 10:52
response is always the same irrespective of what 10:52
the first input is, is that feedback? 10:52
MS. NGUYEN: Objection, form. 10:52
Q. I'm sorry, is that natural language 10:52
feedback? 10:52
MS. NGUYEN: Same objection. 10:52
A. What is the response? Is the 10:52
response in natural language form? 10:52
Q. Okay. Let's say no matter what you 10:52
type in, it says, I am a chatbot, and all I can 10:52
do is generate an email signature. And no 10:52
matter what you type in, if you say, I would 10:52
like a sandwich or if you say, I would like an 10:52
email signature or if you say, It's blue, it 10:52
always gave that response, would that be a 10:52
natural language conversation? 10:52
MS. NGUYEN: Objection, form. 10:53
A. This is a hypothetical. And not in 10:53
the context of what I have been reviewing and 10:53
what I have presented. 10:53
So in that specific example, I still 10:53

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can't tell whether that is a natural -- by just 10:53
giving that information, I can't tell -- that's 10:53
not enough information for me to know. 10:53
Q. So if you had the hypothetical that 10:53
I just gave you, that would be insufficient for 10:53
you to determine whether or not it was a natural 10:53
language interface. 10:53
MS. NGUYEN: Objection, form. 10:53
A. I said it was an interface because 10:53
it was transporting natural language. 10:53
I'm sorry, what is -- how did I say 10:53
that's not an interface? 10:53
You just -- just a moment ago -- 10:53
Q. I'm sorry. 10:54
A. -- said it was an interface. 10:54
Q. When I asked you the question about 10:54
a chatbot that -- I'm sorry, let's strike that. 10:54
So the example I gave you before was 10:54
that you had an interface which no matter what 10:54
you typed always responded the same way, I am a 10:54
chatbot and all I can do is generate an email 10:54
signature. 10:54
So it does not matter what the input 10:54
is. The output or response is always the same, 10:54

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the feedback, okay? 10:54

Would that be a natural language 10:54

conversation under your understanding with your 10:54

training in NLP in the context of the '664 10:54

patent? 10:54

MS. NGUYEN: Objection, form. 10:54

A. I'm sorry, you are going all over 10:54

the place. You're conflating interface and 10:54

conversation. I mean, the second time, you 10:54

asked it with a conversation. The first time 10:54

was an interface. 10:54

It keeps changing. So be very 10:54

specific, please. Let's stay on just -- let's 10:54

not conflate these different meanings. I'm so 10:54

sorry, because I -- it's very hard for me to 10:55

answer something when you've come back and you 10:55

change it to something else. 10:55

Q. Dr. Beigi -- 10:55

A. Yes. 10:55

Q. -- every question stands and falls 10:55

on its own. I'm not building on them. I'm 10:55

asking you a question. I want you to answer not 10:55

the question I asked two times ago, I'm asking 10:55

you to answer the question I'm asking now. 10:55

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Do you understand that? 10:55
There is no conflation between 10:55
questions. Each question is its own question. 10:55
A. I thought you were rephrasing. 10:55
MS. NGUYEN: Objection, form. 10:55
Q. Even if I am rephrasing, it stands 10:55
and falls on my rephrasing. 10:55
A. Okay. 10:55
Q. You have to answer the question I'm 10:55
asking. Don't try and guess on some other 10:55
question. 10:55
If you don't understand what I am 10:55
asking, say I don't understand. Okay? 10:55
The question I'm asking was very 10:55
clear, and we will go back to it. Okay? 10:55
I gave you an example before where 10:55
you had an interface that no matter what the 10:55
first input was typed in always gave the same 10:55
response. 10:56
Okay? You understand that? 10:56
A. Yes. 10:56
Q. Okay. In that context, would there 10:56
be a natural language conversation based upon 10:56
always getting the same response no matter what 10:56

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the input is based upon your understanding of -- 10:56
with your training in NLP in the context of the 10:56
'664? 10:56
MS. NGUYEN: Objection, form. 10:56
A. As long as there is natural language 10:56
going in and natural language coming out, it is 10:56
still a conversation. Not a good one, but still 10:56
a conversation. 10:56
Q. And is it a natural language 10:56
conversation with the first natural language 10:56
input from the user and a natural language 10:56
feedback on the first natural language input 10:56
from the natural language interface where the 10:56
response is -- does not rely upon what the user 10:56
input? 10:56
MS. NGUYEN: Objection, form. 10:56
A. But you're making an assumption that 10:57
it doesn't rely upon. 10:57
Q. I am. 10:57
A. It receives it -- yes, but I am 10:57
saying it receives it and it responds. 10:57
Q. No matter what you put in. It 10:57
doesn't rely upon it. 10:57
A. And that's what I am trying to tell 10:57

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you. 10:57

If we know for a fact that it 10:57

randomly responds in some natural language form, 10:57

it's still a conversation. But it's a bad one. 10:57

Q. No. Is it a conversation that has 10:57

natural language feedback on the first natural 10:57

language input from the natural language 10:57

interface where the response is the same 10:57

irrespective of what the first natural language 10:57

input is? 10:57

MS. NGUYEN: Objection, form. 10:57

A. So here it says -- if we are going 10:57

now in this context, it says -- because we are 10:57

going in the context of '664. You are pointing 10:57

to claim 1, if I am correct. 10:57

Q. Correct. 10:57

A. And in here, it says, "a natural 10:57

language feedback on the first natural language 10:57

input." 10:58

It doesn't say, "based on." It 10:58

says, "on the first natural language input from 10:58

the natural language interface." 10:58

So upon receiving, it doesn't say, 10:58

"based upon." That doesn't -- it doesn't make 10:58

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any connotation here that the -- it has to make 10:58
a decision, it has to make something that's -- 10:58
you know, there is replying specifically to 10:58
that. 10:58
In this wording, it just says -- 10:58
I'll read it again, "a natural language feedback 10:58
on the first natural language input." 10:58
Q. So if the board were to determine 10:58
that a natural language feedback on the first 10:58
natural language input from the natural language 10:58
interface needed to use natural language 10:58
processing to determine what that feedback would 10:58
be based upon the information that it got from 10:58
the first natural language input, would that 10:58
impact any of your analysis of any of the prior 10:58
art in the '664 patent, IPR? 10:59
MS. NGUYEN: Objection, form. 10:59
A. No, I don't think so. 10:59
Q. And under that construction, do you 10:59
understand that the software that Mr. Zatkovich 10:59
prepared would include natural language 10:59
interface that complies with the '664 patent? 10:59
A. Under that -- 10:59
MS. NGUYEN: Objection, form. 10:59

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A. Under that construction, what 10:59
Mr. Zatkovich specifically produced, which he 10:59
called a chatbot, which it's not, because I 10:59
looked at the code and chatbot requires natural 10:59
language processing, and it did not do natural 10:59
language processing. So that's a 11:00
mischaracterization. 11:00
But that code did not do any natural 11:00
language processing. You are requiring natural 11:00
language processing based on your statement just 11:00
now. So because we know he did not, then it 11:00
does not comply with it. 11:00
Q. Okay. So you agree that the chatbot 11:00
conversation, which you don't agree is a chatbot 11:00
conversation, that Mr. Zatkovich identified in 11:00
his report as something he programmed is not 11:00
using natural language processing? 11:00
A. I agree, it's not using natural 11:00
language processing. 11:00
Q. And if the PTAB were to adopt your 11:00
claim construction, do you think that what 11:00
Mr. Zatkovich programmed in that exhibit meets 11:00
claim 1 of the '664 patent? 11:00
MS. NGUYEN: Objection, form. 11:00

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A. I don't believe it will. 11:00

Q. And why not? 11:01

A. Because Mr. Zatkovich, as we 11:01
required, did not use natural language 11:01
processing, and in this context, we are talking 11:01
about the context of this patent, we are talking 11:01
about a chatbot. 11:01

And we are requiring natural 11:01
language processing, which you just stated, and 11:01
since Mr. Zatkovich does not use natural 11:01
language processing, it does not qualify. 11:01

Q. Okay. But my question wasn't that 11:01
it required that. I said if we adopt your claim 11:01
construction. 11:01

So my question was, and if the PTAB 11:01
were to adopt your claim construction, do you 11:01
think what Mr. Zatkovich programmed in that 11:01
exhibit meets claim 1 of the '664 patent? 11:01

So I want to know under your claim 11:01
construction. 11:01

MS. NGUYEN: Objection, form. 11:01

A. In light of the specifications, no. 11:01
Because the claims come in light of the 11:01
specifications. The specifications multiple 11:01

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times speak about a chatbot, and in -- in a 11:02
chatbot, and they do talk about natural language 11:02
processing. 11:02
So even reading that portion of it, 11:02
the way I was just constructing it, that's just 11:02
one portion of the claim. You have to look at 11:02
the claims as a whole. You have to look at the 11:02
claims in light of the specifications. 11:02
And, again, under that construct, 11:02
with the -- in light of the specifications and 11:02
the rest of the claims, it does not qualify. 11:02
Q. Okay. Now if you go back to Beigi 11:02
Exhibit 27, and I want you to look at 11:02
paragraph 1. 11:02
A. Yes. 11:02
Q. And in the first paragraph in the 11:02
last sentence, you say, "I described my 11:02
qualifications in detail in my opening 11:02
declaration dated August 30, 2023, which I 11:02
understand is Exhibit 1003 to this proceeding." 11:03
A. That's correct. 11:03
Q. And there is no qualifications that 11:03
you are offering beyond what was included in 11:03
Exhibit 1003, correct? 11:03

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A. That's correct. 11:03

Q. Okay. And in paragraph 2, you say, 11:03
"I am being paid at my standard consulting 11:03
rate." 11:03

Correct? 11:03

A. Yes. 11:03

Q. And you will not identify 11:03
specifically what that rate is to the PTAB, 11:03
correct? 11:03

A. I provide a ballpark here. 11:03

Q. But you will not identify 11:03
specifically what the rate is beyond providing 11:03
the ballpark figure. 11:03

A. I'm legally obligated not to. 11:03

Q. It calls for a "yes" or "no." 11:03

A. I just did answer. 11:03

MS. NGUYEN: Object to form. 11:03

Q. So you will not provide what your 11:03
standard consulting rate is other than to say 11:03
the ballpark, is that correct? Yes or no? 11:03

A. At this point, I will not. 11:03

Q. Okay. It also says, "I am also 11:03
being reimbursed for expenses that I incur 11:03
during my work." 11:03

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A. Yes. 11:04
Q. How much expenses did you incur 11:04
during your work? 11:04
A. Not much. It's just the travel to 11:04
here. And that's it. 11:04
Q. Okay. And how much money have you 11:04
been paid to date in total for your work on 11:04
these three IPRs and the IPR that was not 11:04
instituted? 11:04
A. I'm not sure. I don't have the 11:04
invoices. 11:04
Q. A million dollars? 11:04
A. No. 11:04
Q. Half a million dollars? 11:04
A. No. 11:04
Q. 300,000? 11:04
A. No. No. 11:04
Q. 100,000? 11:04
A. It's less than that. 11:04
Q. 50,000? 11:04
A. I don't know. That -- at that 11:04
point, I don't know because I have to have the 11:04
invoices. 11:04
Q. Somewhere between 50,000 and 11:04

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100,000? 11:04
MS. NGUYEN: Objection to form. 11:04
A. I don't know. I really don't know. 11:04
Q. More than 100,000? 11:04
A. No. 11:04
Q. Okay. So that would make it 11:04
somewhere less than 100,000 -- 11:04
A. From zero to 100,000. It's not 11:05
zero, we know, and I cannot tell you anymore. 11:05
Q. Is it more than 10,000 dollars? 11:05
A. Yes. 11:05
Q. Is it more than 20,000 dollars? 11:05
You can give me a range or I'll keep 11:05
asking you. 11:05
A. I -- when it gets to around 50,000 I 11:05
cannot tell because I don't know the exact 11:05
amounts in that range. 11:05
Q. Okay. So somewhere north of 40,000 11:05
and less than 100. 11:05
A. Again, I'm not sure, but around, 11:05
yes, I would say. 11:05
Q. Would you say it's less than 75? 11:05
A. I'll -- yes. 11:05
Q. Would you say it's less than 60? 11:05

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A. I don't know at that point. 11:05
Q. How much money did you make this 11:05
year in general? 11:05
A. I haven't looked at my -- 11:05
MS. NGUYEN: Objection to form. 11:05
A. I haven't looked at my income this 11:05
year yet. 11:05
Q. Putting aside this case, did you 11:05
make a million dollars? 11:05
A. I don't think so. 11:05
Q. Did you make 500,000, putting aside 11:05
this case, this year? 11:05
A. I can't tell. 11:06
Q. You may have made 500,000 outside of 11:06
this case this year? 11:06
MS. NGUYEN: Objection, form. 11:06
A. It's possible. I don't know. 11:06
Q. You don't know. 11:06
A. I don't know. I haven't looked. 11:06
Q. Do you know what you made last year? 11:06
A. I know what I made last year. 11:06
Q. Did you make more or less than 11:06
500,000 last year? 11:06
MS. NGUYEN: Objection, relevance. 11:06

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A. I don't know. Because there are -- 11:06
there are parts of the income where you don't 11:06
execute, where you're not actually -- they are 11:06
not active. They are investments. 11:06
So I can't tell you that. I don't 11:06
know. 11:06
Q. Okay. So you don't know whether or 11:06
not you made more or less than 500,000 last 11:06
year? 11:06
A. I don't know. 11:06
Q. Okay. 11:06
How much have you been paid since 11:06
your last deposition with respect to preparing 11:07
these three declarations? 11:07
A. Have I already been paid? 11:07
MS. NGUYEN: Objection, form. 11:07
Q. Or billed to be paid. 11:07
A. I don't know. I haven't billed this 11:07
month yet. 11:07
And I don't remember what I 11:07
billed -- I have several cases, not just patent 11:07
cases, but I have several clients that I'm not 11:07
sure. 11:07
Q. You have several clients that you 11:07

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are working on this reply declaration for? 11:07

A. No. I said -- you're asking me, and 11:07
I don't know what the invoices are because I 11:07
don't remember what the invoices were for the 11:07
past -- from June to today. 11:07

Q. Okay. Have you been working on this 11:07
declaration since June? 11:07

A. No. 11:07

Q. When did you start working on 11:07
Exhibit 27? 11:07

A. Past couple of months. I can't be 11:08
more exact because I don't remember exactly. 11:08

Q. Did you work on it before or after 11:08
Mr. Zatkovich was deposed? 11:08

MS. NGUYEN: Objection, form. 11:08

Q. I'm sorry? 11:08

A. Partly after. For the most part, 11:08
after. 11:08

Q. How many hours did you work on Beigi 11:08
Exhibit 27? 11:08

A. I could give you a ballpark. 11:09
Probably about 10 to 20 hours. 11:09

Q. So if you worked 20 hours on it, it 11:09
is 76 pages, how many hours did you spend on 11:09

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each page? 11:09

A. I gave you a ballpark, and I worked 11:09
on all three of them at the same time because 11:09
they are related, the three declarations. 11:09

And that's why I don't know. There 11:09
is no break down. I don't know how much -- 11:09
you're asking me things that I cannot tell 11:09
without looking up my records. 11:09

So it's all conjecture because I'm 11:09
just giving you some ballpark figures and I -- I 11:09
don't know. It's just I don't know the details. 11:09

Q. So did you spend 20 hours working 11:09
only on Beigi Exhibit 27 or did you also spend 11:09
that 20 hours, give or take, also working on 11:09
Beigi Exhibit 28 and 29? 11:09

MS. NGUYEN: Objection, form. 11:10

A. The '664 declaration took longer 11:10
than the other two. 11:10

Q. In other words, did you spend 11:10
approximately 60 hours in total for all three or 11:10
did you spend 20 hours -- approximately 20 hours 11:10
in total for all three? 11:10

MS. NGUYEN: Objection, form. 11:10

A. More than 20 hours in total for all 11:10

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three probably. But, again, I cannot tell you 11:10
an exact number. 11:10
Q. I didn't ask for an exact number. 11:10
I'm trying to get a ballpark from you -- 11:10
A. Then I responded. 11:10
Q. -- which was, I'm trying to 11:10
understand, was your 20 hours with respect to 11:10
only Beigi Exhibit 27 or was it with respect to 11:10
all three? Because you seem to have said both 11:10
in our conversation just now. 11:10
A. No, I did not. 11:10
MS. NGUYEN: Objection, form. 11:10
Q. Well, that's what I am trying to 11:10
understand from you. 11:10
A. I told you, based on '664, that I 11:10
said 10 to 20. You picked 20. I did not. 11:10
Q. I'm just trying to give you the most 11:10
amount of time possible. 11:10
A. No, but then you can't tell me that 11:10
I picked 20 and then you told me -- you're 11:10
asking -- you're telling me -- please let me 11:11
finish -- you are telling me that I told that 11:11
you that I spent 20 hours -- 11:11
Q. Let's withdraw the question and 11:11

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start again. 11:11

A. Thank you. 11:11

Q. I want know how much time you spent 11:11
approximately working on each of the three 11:11
declarations that we have marked as 27, 28 and 11:11
29. 11:11

A. I would say maybe 30 to 35 hours, 30 11:11
to 35 or 40. I'm not sure. 11:11

I'm giving you a ballpark, and 11:11
please don't keep drilling the same thing again. 11:11
Because it's just -- I'm just giving you 11:11
ballparks, and you keep trying to push for an 11:11
exact number. I don't have it. 11:11

Q. Okay. Dr. Beigi, frankly, you 11:11
should have known that I was going to ask you 11:11
this question because I asked you last time the 11:11
same type of question, and you should have 11:11
looked, but you didn't. So I am dealing with 11:11
what I have to deal with. 11:12

MS. NGUYEN: Objection, form. 11:12

Q. I'm trying to get you to give me an 11:12
understanding of how much time you spent for all 11:12
three or each one individually, and your answer 11:12
is kind of vague. And so the reason why I'm 11:12

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drilling down with you is because I'm trying to 11:12
clarify what you are saying. 11:12
I don't mind that you're giving a 11:12
range, but I want to know what the range is 11:12
covering. 11:12
So when you're saying somewhere 11:12
between 30 and 40 hours, is that in total for 11:12
all three declarations or is that with respect 11:12
to each of the three declarations? 11:12
A. For all three of them. 11:12
Q. Okay. So there are 76 pages in 11:12
Exhibit 27, and 95 pages in Exhibit 28, and 63 11:12
pages in Exhibit 29. 11:12
A. Yes. 11:12
Q. So -- 11:12
A. I take your word for it. I didn't 11:12
check. But I take your word. 11:12
Q. You have them in front of you. You 11:12
are welcome to look. 11:12
A. It's fine. I trust you on this one. 11:13
Q. Okay. So roughly 250, is that what 11:13
you would say? 11:13
You can do the math better than me. 11:13
MS. NGUYEN: Objection, form. 11:13

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A. Roughly 250 pages, is that what you said? 11:13

Q. Yeah, 76 plus 95 plus 63? 11:13

A. Okay. 11:13

Q. Okay? And giving you the benefit that you spent 40 hours -- 11:13

A. Okay. 11:13

Q. -- okay? 11:13

So how much time did you spend on each page of those roughly 250 pages over the 40 hours? 11:13

You can do the math. 11:13

MS. NGUYEN: Objection, form. 11:13

A. How is that -- it's on record. It's 40 and 250. Why -- what's the point? 11:13

Q. The point is, how much analysis you put in to preparing these declarations. 11:13

A. I put the analysis that is required. 11:13

Q. To draft and verify these declarations? You drafted them? 11:14

A. Yes. 11:14

Q. By yourself? 11:14

A. No. With the help of the counsel. 11:14

Q. How much of the declaration is your 11:14

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original words versus counsel's? 11:14

A. It's very hard to tell because we went back and forth a lot. 11:14

Q. Well, only 40 hours. 11:14

A. 40 hours is not only. 40 hours is a lot of time. 11:14

Q. You wrote a book, right? You wrote a book? 11:14

MS. NGUYEN: Objection, form. 11:14

A. I don't -- 11:14

Q. You have written a book. 11:14

A. I've written a book, yes. 11:14

Q. Have you written any papers that are 50 pages? 11:14

A. Exactly? 11:14

Q. Or around the order of 50 pages. 11:14

A. Or more -- 11:14

Q. Okay. 11:14

A. -- yes. 11:14

Q. Did you only spend 40 hours to write 50 pages in your scientific pursuit? 11:14

A. My scientific pursuit has a lot of algorithms and equations and mathematical procedures, which require more time. 11:14 11:15

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So in terms of complexity, we cannot 11:15
compare the two. 11:15
Q. Okay. So when you're doing your 11:15
scientific pursuit, it is more complex than the 11:15
analysis that you have given in these reply 11:15
declarations, so it takes more time, is that 11:15
what your testimony is? 11:15
MS. NGUYEN: Objection, form. 11:15
A. My scientific pursuit or writing a 11:15
technical paper? 11:15
Q. Writing the technical paper with 11:15
respect to your scientific pursuit. 11:15
A. Writing the technical paper in my 11:15
field requires, because it has a lot of 11:15
mathematical algorithms, requires more time. 11:15
Q. So when you're -- what was the last 11:15
paper you wrote on NLP? 11:15
A. We just talked about it. We didn't 11:15
get a chance to actually look it up. Like I 11:15
said, it's on archived.org. 11:15
It would be between the time of our 11:16
last deposition to today, I -- not to today, 11:16
maybe to a couple of months ago, but I don't 11:16
remember the exact date. 11:16

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Q. Okay. But when you wrote that 11:16
paper, was it approximately 10 pages, 20 pages, 11:16
30 pages? 11:16
I'm not going to hold you to an 11:16
exact number. I just want to get the sense of 11:16
it. 11:16
MS. NGUYEN: Objection, form. 11:16
A. I don't remember. I work with my 11:16
students. My -- this was with a Ph.D. student. 11:16
And, you know, we go back and forth, and I don't 11:16
even remember the number of pages at this point. 11:16
The most recent paper we published 11:16
was not on natural language processing but about 11:16
79 pages with another student. 11:16
Q. And how long did you and the other 11:16
student spend writing that paper? 11:16
A. It's hard for me to tell what the 11:17
student spent because he is not even in this 11:17
country -- 11:17
Q. Okay. I'll rephrase it. 11:17
A. -- so I can't tell. 11:17
Q. I'll rephrase it. 11:17
How much time did you spend beyond 11:17
what the student spent in writing that paper of 11:17

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around 75 pages? 11:17

A. See, the writing is not the only 11:17

part, the actual writing. It's the running the 11:17

experiments, coming up with architectures, these 11:17

are all the time that it takes. 11:17

Are you including -- please let me 11:17

ask the question because you are shaking your 11:17

head. 11:17

Is all of that included in what 11:17

you're asking or the actual sitting behind the 11:17

computer and typing? 11:17

Q. No, I want everything that went into 11:17

figuring out what to say and how to say it and 11:17

saying it that involved you in the 75-or-so-page 11:17

paper that you did with your student. How much 11:17

time did you spend doing that? 11:17

A. It was spread over a year. So I 11:17

can't tell you how much time it actually took. 11:17

But it was spread out over a year. 11:18

Q. Was it less than 40 hours? 11:18

A. Again, I really cannot tell you 11:18

that. Because I have no idea how much time was 11:18

spent on it. I didn't -- there, I'm not getting 11:18

paid for the publication, and I'm not -- I 11:18

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definitely have no way of telling. 11:18

I spend a lot of time on a lot of 11:18

things, and I've no idea how much I spent on 11:18

that. 11:18

Q. And do you have a sense, sitting 11:18

here today, whether you spent more time working 11:18

on that 75-page paper with your student than you 11:18

did with respect to Beigi Exhibit 27, which is 11:18

76 pages? 11:18

A. Yes, I did spend more time. 11:18

Q. On the paper? 11:18

A. On the paper. 11:18

Q. Going back to Beigi Exhibit 27. 11:18

In paragraph 3, it says, "I have 11:18

personal knowledge of the facts and opinions set 11:18

forth in this declaration and believe them to be 11:19

true." 11:19

A. Yes. 11:19

Q. Does that mean that every sentence 11:19

that you have in this declaration is a 11:19

reflection of your personal knowledge? 11:19

A. Yes. 11:19

Q. So in paragraph 7, when you say (as 11:19

read), I understand that Mr. Zatkovich believes 11:19

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that the computer program has a special meaning, 11:19
and propose construing it as a target system 11:19
which is where the functionality is invoked 11:19
through a display user interface, is that based 11:19
upon your personal knowledge? 11:19
A. Yes. 11:19
MS. NGUYEN: Objection, form. 11:19
Q. Then why did you say, "I 11:19
understand"? 11:19
A. I'm sorry? I said, yes, I 11:19
understand. I -- yes, it is -- did I say 11:19
anything wrong? 11:19
You asked me -- 11:19
Q. I'm asking whether it's based on 11:19
your personal knowledge, that statement. 11:19
MS. NGUYEN: Objection, form. 11:19
A. I don't understand the question. 11:19
What do you mean based on my 11:19
personal knowledge? 11:19
Q. Usually, in declarations, when 11:19
people say, "I understand," it's because someone 11:19
informed them. 11:20
Here, you're saying that you have 11:20
personal knowledge of every sentence in this 11:20

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declaration, but yet, you're saying you 11:20
understanding something. 11:20
So I'm trying to understand from 11:20
you, when you say, "I understand," does that 11:20
still mean that it's your personal knowledge 11:20
which generated your understanding or did 11:20
someone else generate that understanding? 11:20
A. I understand because of 11:20
Exhibit 2001, which I referred to. That's how I 11:20
understand that this is what Mr. Zatkovich 11:20
believes. 11:20
Q. So when you prepared this reply, you 11:20
actually read Exhibit 2001. 11:20
A. Yes. This part, yes. 11:20
Q. And when you prepared the reply, you 11:20
also read the POR, which is cited later in 11:20
paragraph 7. 11:20
MS. NGUYEN: Objection, form. 11:20
Q. Page 3. See it says, "POR, 28"? 11:20
A. I did look it up, but I -- you know, 11:21
I read the document. So -- and, of course, like 11:21
I said, I was also informed by the counsel. We 11:21
went back and forth. 11:21
So when I say that this is my 11:21

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understanding, that I understand -- let me go 11:21
back to what you were referring to, that I have 11:21
personal knowledge of the facts and opinions set 11:21
forth, is that I understand every single thing 11:21
that is stated here. 11:21
I have personal knowledge of it. I 11:21
understand everything that is stated here, and I 11:21
agree to everything that is stated here. 11:21
Q. So did you read POR? 11:22
A. I was provided with a portion of the 11:22
exam -- of the parts that we used actually for 11:22
this statement. So I've seen it. 11:22
Q. You have seen the whole document or 11:22
you've seen a portion of the document? 11:22
A. I've seen parts of the document, and 11:22
I've seen the whole document. I've seen whole 11:22
document but I concentrate on parts of the 11:22
document, which I read. 11:22
Q. In that 40 hours, did you read the 11:22
whole document? 11:22
A. I did not read the whole document. 11:22
I looked at the whole document. 11:22
Q. Did you read all of Exhibit 2001? 11:22
A. I went through it quickly, yes. I 11:22

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did go through the whole thing. 11:22

Q. Mr. Zatkovich is sitting here today. 11:22

You see him, right? 11:22

A. I believe I know -- 11:22

MS. NGUYEN: Objection, form. 11:22

A. -- Mr. Zatkovich is the person at 11:22

the end of the table. 11:23

Q. Yeah. And he was at your prior 11:23

two days of deposition, right? 11:23

A. I believe -- if you say so. There 11:23

were a lot of people there. And it was an 11:23

extended room, so... 11:23

Q. It's the same room we are in, but 11:23

the door was opened. 11:23

A. I believe you. He was there. 11:23

Q. Okay. And so he has heard and saw 11:23

everything you said -- 11:23

A. Okay. 11:23

Q. -- or at least -- and then he also 11:23

read the transcript, as far as you understand, 11:23

right? 11:23

A. Yes. 11:23

Q. Because you read 2001, and he 11:23

identified the materials you relied on, right? 11:23

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A. Yes. 11:23
Q. Okay. Did you identify the 11:23
materials that you reviewed and relied on in 11:23
Exhibit 27? 11:23
A. Like I said, we went back and forth, 11:23
and identifying what part is -- 11:23
Q. That's not my question. 11:23
A. Yeah, so with the help of the 11:23
counsel, I did, yes. 11:24
Q. That is not my question. 11:24
A. I'm asking -- 11:24
Q. In that document, did you make a 11:24
list that these are the materials that I 11:24
reviewed and relied on? 11:24
A. I'm sorry -- 11:24
Q. Did you make a list -- 11:24
MS. NGUYEN: Object to form. 11:24
Q. -- in the exhibit, or if anywhere, 11:24
say, I reviewed Mr. Zatkovich's deposition 11:24
transcript, and I reviewed Mr. Zatkovich's 11:24
expert report. 11:24
Did you make a list of the documents 11:24
that you read and reviewed as part of your 11:24
analysis resulting in Beigi Exhibit 27? 11:24

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A. Yes. Page Roman numeral 5, 6, 7 and 8 -- 11:24

Q. Okay. Wait -- 11:24

A. -- I have every of these documents and I've looked at every one of the documents. I did not read every single line of every document, but I -- yes, I have reviewed all of these documents. 11:24

Q. And are there any documents that aren't listed on pages Roman numeral 5, 6, 7, 8 of Beigi Exhibit 27 that you read and reviewed as part of your preparation of Beigi Exhibit 27? 11:25

A. I'm not sure. I don't think so, but I'm not sure. I don't think so. 11:25

Q. If you notice, none of the patent owner exhibits are listed there. 11:25

A. The 2000 ones? 11:25

Q. Correct. 11:25

A. That's an oversight. But I did definitely review them. 11:25

So I didn't notice that just now. 11:25

Q. You reviewed every single one of the patent owner's exhibits? 11:25

A. As far as I know, the ones that I 11:25

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have in the list of exhibits. 11:25

Q. How many declarations of 11:26

Mr. Zatkovich with respect to IPR2023-01368 did 11:26

you review? 11:26

A. Which one is that? Is that '664? 11:26

Q. Yes, we are still in the same, '664. 11:26

A. The reply declaration that 11:26

Mr. Zatkovich wrote and his deposition -- the 11:26

transcript of his deposition. 11:26

Q. Again, I said how many declarations 11:26

of Mr. Zatkovich with respect to IPR2023-01368 11:26

relating to the '664 patent did you review, one, 11:26

two, three, four? 11:26

A. I believe one, the declaration, one. 11:26

Q. Are you sure you didn't review two? 11:26

A. I'm not sure. I don't think so. I 11:26

think it was one. Reply -- I remember a reply 11:27

declaration. 11:27

If you -- I'm going on memory at 11:27

this point. 11:27

Q. I would like to show you what was 11:27

submitted as Exhibit 2014 in IPR2023-001368, 11:27

Supplemental Declaration of Ivan Zatkovich 11:27

Pursuant to 37 CFR Section 42.64(b)(2) in 11:27

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Response to Petitioners Objection to Evidence in 11:27
Providing Supplemental Evidence for Inter Parte 11:27
Review of Claims 1 through 9, 12 through 16, 18 11:27
through 23, 25 through 26, 28 through 31 and 33 11:27
of U.S. Patent Number 10,819,664. 11:27
I believe we are marking it as Beigi 11:27
Exhibit 30. 11:27
(Exhibit 30, document entitled 11:28
"Supplemental Declaration of Ivan 11:28
Zatkovich Pursuant to 37 CFR Section 11:28
42.64(b)(2) in Response to Petitioners 11:28
Objection to Evidence and Providing 11:28
Supplemental Evidence for Inter Partes 11:28
Review of Claims 1-9, 12-16, 18-23, 25-26, 11:28
28-31, and 33 of U.S. Patent No. 11:28
10,819,664," marked for identification, as 11:28
of this date.) 11:28
Q. Let me know if you recognize Beigi 11:28
Exhibit 30. 11:28
MS. NGUYEN: Counsel, we just want 11:28
to object to Exhibit 2014 for having been 11:28
filed and made publicly available. We 11:28
discussed this before, but we can also 11:29
discuss this off the record. 11:29

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A. I'm not sure if I've seen this in 11:30
context of the original declaration or not. I 11:30
don't remember right now. 11:30
It may have been -- because I had 11:30
been shown copies of the documents, so I'm not 11:30
sure if I have seen this specifically as part of 11:30
the original declaration or not. So I'm not 11:30
quite sure. 11:30
Q. It is not the original 11:30
declaration -- 11:30
A. I know. 11:30
Q. -- I'll represent to you, and it's 11:30
dated July 29 if you look at page 17 of 17. 11:30
A. Right. 11:31
Q. So it would be something that you 11:31
would not have seen before July 29. 11:31
A. Right. No, I'm saying, in the 11:31
reply -- the reply -- the reply declaration -- 11:31
the patent owner's reply declaration of 11:31
Mr. Zatkovich. 11:31
Q. This is after the patent owner's 11:31
reply declaration of Mr. Zatkovich because it is 11:31
dated later. 11:31
A. That's what I am saying. I'm saying 11:31

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I'm not sure if I have seen it in conjunction 11:31
with that as one document or not. That's what I 11:31
am trying to tell you. 11:31
Q. Okay. 11:31
A. I can't -- I mean, the content seems 11:31
to be talking about the same thing, so without 11:31
sort of reading the whole thing and -- so I'm 11:31
not quite sure right now whether this was in the 11:31
document -- for the full document that I had for 11:31
declaration -- for the reply declaration or not. 11:31
That's what I am trying to say. 11:31
Q. So your testimony is, you're not 11:31
sure whether you've actually reviewed Beigi 11:32
Exhibit 30 before? 11:32
MS. NGUYEN: Objection, form. 11:32
A. Yeah, I'm not quite sure. I can't 11:32
tell you. 11:32
I do see that the arguments -- I see 11:32
the arguments, and I remember the arguments, but 11:32
I'm not sure whether I've seen this in 11:32
conjunction with the original reply declaration 11:32
that Mr. Zatkovich gave or not. That's the 11:32
answer. 11:32
Q. Did you find -- okay. You see on 11:32

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pages 2 and 3 of Exhibit 30, there is a list of 11:32
the patent owner exhibits. 11:32
A. Yes. 11:32
Q. I want you to go down that list and 11:32
identify whether you have seen each of the 11:33
exhibits that are listed there before you 11:33
finalized and prepared Beigi Exhibit 27. 11:33
A. Okay. I've seen. 11:33
2001. I've seen 2002, 2003 and 11:33
2004, of course. 2005, 2006, 2007, 2008, 2009, 11:33
2010. 11:34
I'm not sure what the patent numbers 11:34
refer to. Can you -- oh, this is '732 and '317, 11:34
yes, of course. '732 and '317, I've seen those. 11:34
Q. So you are referring to 11:34
Exhibits 2012 and 13? 11:34
A. 12 and 13, yes. 11:34
Q. Right. 2011 is reserved because of 11:34
the other patents, we use that for the '664 11:34
patent. 11:34
A. Okay. I have seen that, too. 11:34
This is the supplemental we are 11:34
looking at right now. 11:34
Q. Right. 11:34

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A. So that, I'm not -- like I said, I'm 11:34
not quite sure that -- whether I've seen this 11:34
together with 2001 or not. That's what I am 11:34
trying to say. 11:34
Q. But the substance of it, you 11:34
recognize. 11:34
A. Substance I recognize just glancing 11:34
it at it, not reading it through right here. 11:34
Q. And what about 2015? 11:34
I can give you copies of 2015 to 11:35
2018, if you want. 11:35
A. Would you? If you don't mind. 11:35
Q. Absolutely. 11:35
A. Yeah, that is just a link, so I'm 11:35
not sure -- and the number is not there, so I'm 11:35
not quite sure. 11:35
MR. MACEDO: Okay. So we will mark 11:35
as Exhibit 2015 -- okay. This is a copy 11:35
that was taken from IPR2024-00165 IPR. 11:35
It's the same exhibit, but it's taken from 11:35
that one. 11:35
Q. And it's marked as Exhibit 2015, and 11:35
it is URL page from medium.com that was 11:35
reflecting comments that were submitted with 11:35

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respect to what you referred to as the Symons 11:35
article? 11:36
A. I have seen that. Now that you have 11:36
described it, I see it. 11:36
MS. NGUYEN: Objection to form. 11:36
Q. We will go ahead and mark it just so 11:36
that way, you can look at it before you say 11:36
that. 11:36
MR. MACEDO: And we are marking it 11:36
as Exhibit 31. 11:36
MS. NGUYEN: Counsel, you meant 11:36
IPR2024-00065. 11:36
(Exhibit 31, screenshot from 11:36
medium.org, marked for identification, as 11:36
of this date.) 11:36
MR. MACEDO: And, Counsel, that is 11:36
the correct IPR number. 11:36
I will now mark as Exhibit 32 what 11:36
was submitted in IPR2024-00065 as 11:36
Exhibit 2016, which is also from the same 11:36
Medium article that we were talking about 11:36
with the comments that were submitted by 11:37
Sachin Prakash. 11:37
A. Yeah, I'm not sure -- actually, I 11:37

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was referring to a different comments. I 11:37
thought you were talking about the comments on 11:37
the Symons. I -- 11:37
Q. These are comments on Symons. 11:37
When chatbot meets RPA, Senne 11:37
Symons, at the top. 11:37
A. Oh, so this is just the comment part 11:37
that's been copied? 11:37
(Exhibit 32, screenshot from 11:37
medium.org, marked for identification, as 11:37
of this date.) 11:37
MS. NGUYEN: And, Counsel, after 11:37
this, can we take a break? 11:37
MR. MACEDO: When I'm done with the 11:37
line. 11:37
And we are going to mark as 11:37
Exhibit 33 what was submitted in 11:37
IPR2024-00065 as Exhibit 2017, which are 11:37
comments by Esteban on the same Symons 11:37
Medium submission. 11:37
(Exhibit 33, screenshot from 11:38
Medium.org, marked for identification, as 11:38
of this date.) 11:38
Q. You have now looked at what we 11:38

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marked as 31, 32 and 33. 11:38

Can you tell me whether you have 11:38

reviewed any of those exhibits before? 11:38

A. Yes. I was confused because it has 11:38

a lot of advertisements afterwards, and I don't 11:38

remember the advertisements. 11:38

But it is the first line -- 11:38

basically, the first page is what the comment 11:38

is, and I have seen them, yes. 11:38

Q. Okay. So when you are looking at 11:38

Exhibit 31, which was Exhibit 2015 as submitted 11:38

in the IPRs, it says that it is with respect to 11:38

when chatbots meet RPA bots by Senne Symons, 11:39

right? 11:39

A. Yes. 11:39

Q. That's the same Symons article/blog 11:39

that we have been talking about? 11:39

A. Yes. 11:39

Q. And these are comments that were 11:39

submitted by Neha Negi on September 10, 2018. 11:39

That is your understanding, correct? 11:39

A. Yes. 11:39

Q. And it says (as read), Hi, I saw the 11:39

video but want to know how does the chatbot 11:39

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trigger the RPA bot? Thanks. 11:39

A. Yes, I see that. 11:39

Q. And you understand that that is what 11:39
you as a person of skill in the art would rely 11:39
upon as reflecting that that comment was 11:39
submitted by someone on December 18 in response 11:39
to the Symons article, right? 11:39

MS. NGUYEN: Objection, form. 11:39

Q. The date is up top under his name. 11:39

A. Yeah, but it says September 10. 11:39

Q. I'm sorry, September 10, 2018? 11:39

A. 2018, yes. 11:40

Q. Right. 11:40

A. You said, "December." 11:40

Q. I didn't mean to. 11:40

A. I apologize -- 11:40

Q. That's all right. Let me rephrase 11:40
it. 11:40

You understand that Exhibit 31 is 11:40
reflecting comments that were submitted by 11:40
someone that identified themselves as Neha Negi 11:40
on September 10, 2018 to Medium in response to 11:40
the Symons article, right? 11:40

A. Yes. 11:40

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Q. And do you know how the chatbot 11:40
triggered the RPA bot in the Symons article? 11:40
MS. NGUYEN: Objection, form. 11:40
A. Yes, I do. I speak about it in my 11:40
declaration. 11:40
Q. Feel free. 11:40
And, again, you are looking at 11:41
Exhibit 27? 11:41
A. Yes. 11:41
Q. You are welcome to look anywhere you 11:42
want, but on paragraph 46, you do refer to this 11:42
exhibit. 11:42
A. Okay. Thank you. 11:42
Q. Dr. Beigi, I want you to take your 11:45
time, but can you tell us where you're reading? 11:45
A. Yeah. I'm reading paragraphs 49 and 11:45
50. That's where I talk about this. 11:45
And just give me some time to read 11:45
to go back. 11:45
I'm going back a little bit to 48 11:46
and 49 -- 11:46
Q. Okay. 11:46
A. -- just for your information. 11:46
So going back to the paragraph that 11:48

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you were looking at, 46 -- that you pointed out, 11:48
46, I was looking where I was actually 11:48
discussing the fact that when we see that the 11:48
conversation information, the information that 11:48
is collected in the conversation at the chatbot 11:48
level, is passed to the RPA, which is what is 11:49
described by the combination of Symons and 11:49
Baetens, is passed to the RPA. The RPA 11:49
generates the signature. 11:49
So the act of passing the 11:49
information along to the RPA at the time when 11:49
everything had been approved by the person who 11:49
is providing the information, by the user, that 11:49
act is a triggering. You're triggering the RPA 11:49
by passing the information to the RPA so that it 11:49
can generate the signature. 11:49
We do see that the signature is 11:49
generated, and that is provided in the video 11:49
and, of course, in the snapshots. And, hence, 11:49
the triggering is done by the conversational 11:49
part -- there's usually a chatbot -- the way it 11:49
triggers the RPA because we see the effect of 11:50
it. 11:50
In -- with respect to the detail of 11:50

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how that triggering is happening, that is not a 11:50
very hard thing because the two are working 11:50
together. The chatbot is associated with the 11:50
RPA. 11:50
Because they are associated 11:50
together, they know how to communicate with each 11:50
other, and we see that the triggering happens. 11:50
We see that the RPA received the information it 11:50
needs in order to create the signature and, 11:50
hence, that is the mechanism for trigger. 11:50
So in response to I want to know how 11:50
does the chat bot trigger the RPA bot, I think 11:50
that's a very superficial question because it's 11:50
a call. Apparently, it is a call. There is a 11:50
call to the chat -- to the RPA from the chatbot 11:50
because they're associated with each other and 11:50
they know how to communicate. 11:50
And as they say, as both Mr. Symons 11:51
and Baetens say, they work together to put the 11:51
chatbot and the RPA together and to have them 11:51
communicate with each other. 11:51
So that, I really don't think the 11:51
details of what specific mechanism you use to 11:51
that do that triggering is important because 11:51

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it's immaterial. 11:51
The fact is, we know it gets 11:51
triggered, we know information is being passed 11:51
because we see it on the other side as been 11:51
generated by the signature -- in the signature. 11:51
So that whole mechanism really, as 11:51
far as a -- anybody interested in the process 11:51
is -- the rest of it is very -- really detailed 11:51
information, which is immaterial because you can 11:51
implement it many different ways. 11:51
Q. Right. And you don't know which of 11:51
those many different ways it was actually 11:51
implemented? 11:51
A. It's immaterial because the passing 11:51
of the information -- let me continue, please. 11:51
Q. No, no, no. I asked you, you don't 11:52
know which of the many ways it was actually 11:52
implemented. 11:52
That calls for "yes," "no," "I don't 11:52
know," "I don't recall." 11:52
MS. NGUYEN: Counsel, objection to 11:52
form. 11:52
Please let him finish answering the 11:52
question. 11:52

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MR. MACEDO: He is not answering my question. 11:52

MS. NGUYEN: He can answer -- 11:52

MR. MACEDO: I'm moving to strike. 11:52

MS. NGUYEN: Feel free to move to strike, but, please, let him finish answering the question. 11:52

A. We know that the conversational part, which is the chatbot, is passing the information to the RPA. 11:52

Short of showing the actual code, which is that -- I understand this is a commercial product. Short of showing the actual code, the details are immaterial. That's what I am saying. 11:52

Q. Okay. But that's not my question of whether it's material or not. 11:52

My question is, do you know the answer to his question of how the chatbot triggers the RPA bot other than that it passes information? 11:52

A. It calls the RPA and it passes the information. That is all you need. 11:52

Q. How do you know it calls the RPA? 11:52

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A. Because we see the RPA getting the 11:53
information from the chatbot and producing the 11:53
signature. 11:53
Q. Well, how do you know it's a call? 11:53
A. Because it has to trigger the RPA. 11:53
Otherwise, the RPA doesn't have that 11:53
information. 11:53
Q. But you could trigger it by a send 11:53
or you could trigger it because the RPA asked 11:53
you for it, right? 11:53
A. The RPA can't ask you for it because 11:53
you're the -- the chatbot is in charge of the 11:53
conversation. The RPA can't ask -- 11:53
Q. How do you know that? 11:53
A. -- for things that are -- that 11:53
have -- how can you have an RPA ask for 11:53
something where it doesn't exist yet? 11:53
Q. You can't have an RPA do a call 11:53
function in a batch-like manner at 3 o'clock 11:53
every day and say, Give me all the data from the 11:53
chatbots that we had today. 11:53
MS. NGUYEN: Objection, form. 11:53
Q. Is that physically impossible and 11:53
outside the scope of what could have possibly 11:53

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been done by the RPA that you saw in that video? 11:53
A. That -- that is I think a 11:54
hypothetical that is not related to what we see 11:54
because what we see is a video, a realtime 11:54
video. 11:54
We don't -- the snapshots are just 11:54
provided -- 11:54
Q. Excuse me, a realtime video? 11:54
A. It's a video. 11:54
Q. It's not realtime video. 11:54
MS. NGUYEN: Objection. 11:54
A. "Realtime" means like an observatory 11:54
of realtime in realtime. It's a video. 11:54
Q. No, realtime does not mean you can 11:54
observe it in realtime. 11:54
Realtime -- you don't think that 11:54
video was edited? 11:54
MS. NGUYEN: Objection, form. 11:54
A. I don't know if it was edited or 11:54
not. 11:54
Q. Of course you don't. 11:54
MS. NGUYEN: Objection, form. 11:54
A. By "realtime," I mean it is a video 11:54
that I can watch. And I can see that it's 11:54

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produced that way. 11:54

When the -- the two parties are 11:54

saying that -- if I may go back to the Symons 11:54

exhibit, may I -- or I can even -- yeah, I would 11:55

like to go back to the Symons exhibit directly. 11:55

Q. Okay. I'm going to rephrase my 11:55

question. 11:55

Sitting here today, you do not know 11:55

how the particulars were done to trigger the 11:55

RPA. Anything that you are saying is your 11:55

supposition, not based upon your knowledge of 11:55

what was actually done in watching that video. 11:55

MS. NGUYEN: Objection, form. 11:55

A. To what extent do I not know? 11:55

What you're telling me, based on the 11:55

patent of '664, I don't know how the triggering 11:55

is happening in detail because they don't 11:55

provide code. 11:55

Based on Symons, I know that it says 11:55

that it automatically generates the signature 11:55

based on the -- it says, the chatbot collects 11:56

all information and passes it to the RPA and the 11:56

RPA generates -- automatically generates 11:56

signature. 11:56

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So that process is a continuous 11:56
process. It is described as that. Short of 11:56
seeing the actual code, which is immaterial, 11:56
again, because we don't care what function call 11:56
they use or whether they used any other 11:56
mechanism that's available in a computer program 11:56
to be able to communicate the information and to 11:56
trigger the chatbot. 11:56
We see that it triggers the chatbot 11:56
because it automatically collects all the 11:56
information and passes it to the RPA to 11:56
automatically generate the signature. That is 11:56
what's important. 11:56
This is two processes, and they're 11:57
communicating here. So... 11:57
MS. NGUYEN: Can we take a break? 11:57
Q. I want you to focus -- 11:57
MR. MACEDO: He hasn't answered my 11:57
question yet. He has done a lot of words 11:57
but none of them direct to mine. 11:57
Q. I don't care whether you think it is 11:57
material. I want to know, do you know how the 11:57
information is being passed to trigger the RPA 11:57
bot in the Symons video? Yes or no? 11:57

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MS. NGUYEN: Objection, form. 11:57

A. I don't know the details, but as I said, the details are immaterial because the information is nevertheless passed. 11:57

Q. Okay. 11:57

I just want to also confirm that in paragraph 49 of your dec, you say, "Without knowing the 'internals,' Mr. Zatkovich does not know that his computer code gathers the same information in the same manner as Symons' computer program." 11:57

Correct? 11:57

Look at paragraph 49. 11:57

A. Yes. 11:57

Q. Okay. Do you know something beyond what Mr. Zatkovich knows about the internals to know whether Symons does not gather the same information in the same manner as Mr. Zatkovich? 11:57 11:58

MS. NGUYEN: Objection, form. 11:58

A. I don't know what Mr. Zatkovich knows. Of course, I'm not in his brain. 11:58

I do know that Mr. Symons and Baetens call this the "chatbot." And they speak about a combination of a chatbot and a RPA, and 11:58

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they are both in the field and they understand 11:58
what the chatbot -- I assume that they 11:58
understand what a chatbot and an RPA is. 11:58
I am taking it based on the fact 11:58
that they are basically describing a chatbot RPA 11:58
combination in that light. 11:58
In that context, I know all I need 11:58
to know in order to see how the interprocess 11:58
coming, basically that they are sending 11:58
information -- we know that they are sending 11:58
information. I don't know the details of how 11:58
they are sending the information. 11:58
But we know that they work together. 11:59
That means that if they working together right 11:59
there, it tells you that they have come together 11:59
with some unique way of sending this information 11:59
from the chatbot to the RPA. 11:59
What that is is whatever technique 11:59
they used. That technique is how they 11:59
associated the two together basically. 11:59
Q. And do you know for a fact, sitting 11:59
here today, based upon reading the Symons 11:59
evidence of record, that the computer code in 11:59
Symons gathers the same information in the same 11:59

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manner as -- I'm sorry. 11:59

Do you know, sitting here today, 11:59

whether the computer code that Mr. Zatkovich 11:59

prepared gathers the different information in a 11:59

different manner than the Symons computer 11:59

program? 11:59

MS. NGUYEN: Objection, form. 11:59

A. I have been privy to Mr. Zatkovich's 11:59

code, and I've seen examples which he has 12:00

produced which are not in Symons which are 12:00

hypotheticals. 12:00

So seeing his code, I have more 12:00

information about his implementation, but 12:00

Symons -- and I repeat -- Symons and Baetens say 12:00

that they have -- they are producing a chatbot 12:00

with an RPA, and based on one of your own 12:00

references, Mr. Zatkovich's references from IBM 12:00

as -- in a definition of a chatbot, it requires 12:00

natural language processing. 12:00

It says specifically on top of the 12:00

page of -- I don't remember the right exhibit 12:00

number, but that's the IBM exhibit, which 12:00

defines a chatbot which is used for other 12:00

purposes, but it does include a definition of a 12:00

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chatbot. 12:01

And there, it requires two items. 12:01

Both of them have to be present. One is AI, and 12:01

the other one is natural language processing. 12:01

I see that Mr. Zatkovich's code does 12:01

not include natural language processing. 12:01

Therefore, it is not a chatbot. 12:01

But Mr. Symons and Baetens say we 12:01

have a chatbot. And I don't see any other -- 12:01

anything that says the contrary. I don't see 12:01

anything that negates the fact that they have a 12:01

chatbot because there is a conversation, and 12:01

they're doing what a chatbot is supposed to do. 12:01

Q. So you do not have any firsthand 12:01

knowledge of what was actually done by Symons 12:01

and Baetens, correct? 12:01

MS. NGUYEN: Objection, form. 12:01

Q. You haven't seen the internals. You 12:01

haven't seen the code. 12:01

A. I have not seen the code. 12:01

Q. Okay. And you don't know whether 12:01

the information was gathered in the same way or 12:01

a different way than Mr. Zatkovich's example. 12:01

A. Based on the definition -- 12:02

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MS. NGUYEN: Objection, form. 12:02

A. Based on the way they reported it as 12:02
a chatbot, I expect that it is using natural 12:02
language processing. 12:02

Q. Have you heard of a simple chatbot? 12:02

MS. NGUYEN: Objection, form. 12:02

A. A simple chatbot? 12:02

Q. Yeah. 12:02

A. You can call a chatbot simple if 12:02
it's simple. 12:02

Q. Have you heard of a simple chatbot? 12:02

A. Can you describe -- 12:02

MS. NGUYEN: Objection, form. 12:02

A. -- what you mean by "simple 12:02
chatbot"? 12:02

Q. I just want to know whether you with 12:02
your expertise have ever heard of a simple 12:02
chatbot? 12:02

A. It's not a fixed terminology. This 12:02
is not something you can look for as a simple 12:02
chatbot and you will get exactly the right 12:02
answer. 12:02

So what you're asking me to do is to 12:02
tell you what a simple -- simple is in the eye 12:02

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of the beholder. So simple is what -- in what 12:02
sense? 12:02
Be more -- 12:02
Q. So you have not heard the term 12:02
"simple chatbot" that is used by a person with 12:03
experience in NLP? 12:03
A. I have heard the two words coming 12:03
together, "simple chatbot." 12:03
But I'm saying that -- let me 12:03
finish. 12:03
But I'm saying that that is a -- 12:03
sort of a subjective reference. So like saying 12:03
somebody is a simple person, simple chatbot, it 12:03
doesn't necessarily specify a definition -- a 12:03
scientific definition. That's what I am trying 12:03
to say. 12:03
Q. So if you were told that there was a 12:03
simple chatbot which relied on keywords, would 12:03
you understand that chatbot to be using NLP? 12:03
A. Yes. Because it is a chatbot and 12:03
then it must be using NLP. Using -- because 12:03
natural language -- "NLP" stands for natural 12:03
language processing. 12:03
Looking for keywords is the form of 12:03

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natural language processing. Therefore, yes, I 12:03
would say that you can have a chatbot that has 12:04
natural language processing that uses -- looks 12:04
for a specific keywords. 12:04
MS. NGUYEN: And, Counsel, can we 12:04
take a break? You are on to the next 12:04
question -- actually, you are on two 12:04
questions later. 12:04
MR. MACEDO: No, I'm -- actually, 12:04
I'm still at the same line. 12:04
Q. If you look at Exhibit 2008, which 12:04
is the one that you invoked about IBM, What is a 12:04
Chatbot -- you don't have a copy in front of 12:04
you -- you agree that IBM is an appropriate 12:04
authoritative source to understand what NLP and 12:04
a chatbot is, correct? 12:04
MS. NGUYEN: Objection, form. 12:04
A. Certain publications -- I will still 12:04
take any publication, even from IBM, on its face 12:04
value and, of course, IBM is a reputable 12:04
company. 12:04
Q. And did you have a problem with the 12:04
one that you invoked, which is Exhibit 2008, 12:04
IBM, What is a Chatbot? 12:04

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MS. NGUYEN: Objection, form. 12:04

Q. Did you have a problem with the 12:04
authority of that? 12:04

A. Would you point me to any part of it 12:04
that you are asking about? 12:05

Q. Well, you invoked it as authority. 12:05

Is that because you believed that 12:05
IBM is an appropriate authority to say what a 12:05
chatbot is? Or do you not think that IBM is an 12:05
appropriate authority to say what a chatbot is? 12:05

MS. NGUYEN: Objection, form. 12:05

A. I like the definition that IBM gives 12:05
for a chatbot in that -- on top of the second 12:05
page, I believe, of that document. 12:05

MR. MACEDO: Okay. Let's take a 12:05
break. 12:05

(Recess.) 12:05

(Exhibit 34, document entitled 13:13
"Supplemental Declaration of Ivan 13:13
Zatkovich Pursuant to 37 CFR Section 13:13
42.64(b)(2) in Response to Petitioner's 13:13
Objection to Evidence and Providing 13:13
Supplemental Evidence for Inter Partes 13:13
Review of Claims 1-6, 9-16, and 18-21 of 13:13

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U.S. Patent No. 11,258,732," marked for 13:13
identification, as of this date.) 13:14
BY MR. MACEDO: 13:15
Q. Welcome back, Dr. Beigi. 13:15
A. Thank you. 13:15
Q. I didn't ask you this earlier, but 13:15
there is no reason today why you're not capable 13:15
of testifying honestly and truthfully, right? 13:15
A. No. 13:15
Q. And nothing has changed since this 13:15
morning that would make you not capable of 13:15
continuing to testify? 13:15
A. No. 13:15
Q. Okay. During the break, we marked 13:15
as Exhibit 34 the Supplemental Declaration of 13:15
Ivan Zatkovich Pursuant to 37 CFR 42.64(b)(2) in 13:15
Response to Petitioner's Objection to Evidence 13:15
and to Providing Supplemental Evidence for Inter 13:15
Parte Review of Claims 1 through 6, 9 through 16 13:15
and 18 through 21 of U.S. Patent 13:15
Number 11,258,732 taken from IPR2023-01379 and 13:15
marked as Exhibit 2014 in that IPR. 13:16
Do you recognize that document? 13:16
MS. NGUYEN: Counsel, can I have a 13:16

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copy as well? 13:16

MR. MACEDO: Sorry. You have it 13:16

now? 13:16

34 is from 1379 and 35 is from 13:16

00065. 13:16

MS. NGUYEN: And, also, before we 13:16

begin, I just want to make part of the 13:16

record that Walkme's counsel had ex parte 13:16

communications with the witness. 13:16

A. Yes, the same as what I said before, 13:16

I believe it was part of the whole declaration 13:16

that I looked at together with the reply 13:16

declaration as a continuation. 13:16

But -- I mean, I looked at the 13:16

content and I believe the content looks 13:16

familiar, but specifically, you know, this 13:16

supplemental as a separate item, I'm sort of -- 13:17

I'm not sure. But I do recognize the content. 13:17

Q. There are three separate IPRs, and 13:17

for each IPR, you got a package of 13:17

Mr. Zatkovich's declaration testimony, is that 13:17

correct? 13:17

A. Yes. But I also had a sort of list 13:17

of -- because there are a lot of exhibits that 13:17

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are combined, I did also get a directory, which 13:17
had all the exhibits in one directory. 13:17
Q. And that included the original 13:17
declaration and the supplemental declaration 13:17
from each IPR? 13:17
A. I believe so, yes. 13:17
Q. Okay. And if you look, we also 13:17
marked as Exhibit 35 the Supplemental 13:17
Declaration of Ivan Zatkovich Pursuant to 37 CFR 13:17
42.64(b)(2) in Response to Petitioner's 13:18
Objection to Evidence and Providing Supplemental 13:18
Evidence for Inter Partes Review of Claims 1 13:18
through 20 of U.S. Patent Number 11,558,317 from 13:18
IPR2024-00065. 13:18
(Exhibit 35, document entitled 13:13
"Supplemental Declaration of Ivan 13:13
Zatkovich Pursuant to 37 CFR Section 13:13
42.64(b)(2) in Response to Petitioner's 13:13
Objection to Evidence and Providing 13:13
Supplemental Evidence for Inter Partes 13:13
Review of Claims 1-20 of U.S. Patent 13:13
No. 11,558,317," marked for 13:13
identification, as of this date.) 13:13
Q. And do you recognize Exhibit 35? 13:18

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A. Yes, in the same manner. 13:18
Q. Okay. 13:18
So if we go back -- you want to keep 13:18
these near you but not -- I'm going to go to 13:18
Exhibit 28 again, which is your reply 13:18
declaration from the '732 patent and the 13:18
IPR2023-1379. 13:18
And I want you to look at page 42, 13:18
which is page 52 on the bottom, and in 13:18
particular, paragraph 72. 13:18
And I want to focus your attention 13:19
on the cite before the last sentence where it 13:19
says, Exhibit 2014, paragraphs 392 through 402; 13:19
Exhibit 2005; Exhibit 2015, Exhibit 2016 and 13:19
Exhibit 2017. 13:19
Do you see that? 13:19
A. Yes, I do. 13:19
Let me read the paragraph for the 13:19
context. 13:19
Q. You are welcome to. 13:19
A. Yes. 13:20
Q. Is it clear to you that as part of 13:20
your work in preparing your reply declarations, 13:20
you looked at each version of Exhibit 2014, the 13:20

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supplemental declarations of Mr. Zatkovich that 13:20
we have marked as, I believe, 33, 34 and 35? 13:20
Sorry, 30, 34 and 35. 13:21
A. Okay. 13:21
(Exhibit 36, document entitled "When 13:22
Chatbots meet RPA bots," screenshot at 13:22
3:58, June 18,2024, marked for 13:22
identification, as of this date.) 13:22
A. So right now, we were looking at 13:23
specifically '732, right? 13:23
Q. Right. We previously looked at the 13:23
'634. 13:23
A. And they reuse the same numbers, so 13:23
it's 2014 in this specific case, which is 2014 13:23
of the supplemental declaration -- 13:23
Q. Right. 13:23
A. -- for this specific patent, '732. 13:23
Q. Correct. They are unique 13:23
supplemental -- supplemental declarations marked 13:23
as Exhibit 2014, each IPR. 13:23
A. That's correct, yes. That's what I 13:23
was saying. 13:23
Q. Yes. 13:23
A. There seems to be a wrong paragraph 13:23

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number there. It says '392, so I missed it. 13:24
Yeah, it seems to be a typo here in 13:24
the paragraph -- 13:24
Q. In your declaration? 13:24
A. In my declaration, yes. 13:24
Q. But you believe that you looked at 13:24
Exhibit 2014, which we have marked as 13:24
Exhibit 34. 13:25
A. Yes. So I'm just saying that I 13:25
think there is a typo in the way the declaration 13:25
is listing the paragraphs that it's pointing to. 13:25
Q. Right. The mistake is your 13:25
mistake -- 13:25
A. Yes. 13:25
Q. -- not mine, right? 13:25
A. No, I didn't say it's yours. I'm 13:25
saying, there is an error in this, right, 13:25
document here. 13:25
Q. There is an error in your 13:25
declaration, which you swore was true, complete 13:25
and correct and accurate -- 13:25
A. To the best of my knowledge. 13:25
Q. -- to the best of your knowledge. 13:25
A. And I see there is an -- I just said 13:25

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that there is an error, yes. 13:25

Q. And now your knowledge tells you 13:25

that that -- it has at least one mistake? 13:25

A. At least one mistake because that's 13:25

what I see right now, yes. 13:25

Q. Right. Okay. 13:25

But going back to my question, we 13:25

have looked at the '664 patent IPR declaration, 13:25

and you cited to the Exhibit 2014 from that one, 13:25

right? 13:25

A. Yes. 13:25

Q. Exhibit 30. 13:25

And that was something you reviewed 13:25

in context of preparing the '664, right? 13:25

A. Yes. 13:25

Q. And now we are looking from the 1379 13:25

IPR with respect to the '732 patent, and you 13:25

again identify Exhibit 2014, albeit with the 13:26

wrong paragraph ranges. 13:26

Is that a document that we have 13:26

marked as Exhibit 34, is that a document you 13:26

think you reviewed in preparing your -- 13:26

A. Yes. 13:26

Q. Okay. And then if you want to look 13:26

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at Beigi Exhibit 29, which is your reply 13:26
declaration from IPR2024-00065 relating to the 13:26
'317 patent, and on page 25, which is page 33 of 13:26
the exhibit, at the top of the page, at the 13:26
carryover paragraph 43, you will see that you 13:26
again cited Exhibit 2014 presumably from that 13:26
IPR. 13:26
And I want to know if you can -- 13:26
A. Would you mind saying the page 13:26
number again? 13:27
Q. Sure. It's page 25, which is 13:27
page 33 of the exhibit. And it's referring to 13:27
paragraph 43 in the carryover. 13:27
A. Yes, it seems that there is a 13:27
mistake there as well referring to paragraphs 13:27
which are nonexistent in this -- yeah, the 13:27
paragraph numbers are incorrect. 13:27
Q. So, again, the declaration which you 13:27
thought was true and correct to the best of your 13:28
knowledge that we've marked as Exhibit 29 has at 13:28
least one error on page 25 with respect to 13:28
paragraph 43, citing your own paragraph numbers? 13:28
A. Yes. 13:28
Q. Okay. And same here, you're not 13:28

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aware of any other errors, although there could be errors? 13:28

A. Yes, I am not aware of. 13:28

Q. Did you fact check yourself the citation on page 25 of Exhibit 29? 13:28

MS. NGUYEN: Objection, form. 13:28

A. Did I fact check it myself? I looked -- yes, I looked at the content and I made sure that it was correct. 13:28

The typo must be in the editing in the way, you know, it is edited. It is just the content of what it's referring to is what I looked at, and I looked at the exhibit number and I made sure that it's correct, but there is a typo in the paragraphs referenced in the declaration. 13:29

Q. So if you turn to the last page of Exhibit 29, page 63? 13:29

A. Yes. 13:29

Q. Is that your signature? 13:29

A. It is. 13:29

Q. Can you read into the record what you're stating right above your signature? 13:29

A. "I declare that all statements made 13:29

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herein of my own knowledge are true and that all 13:29
statements made on information and belief are 13:29
believed to be true, and that these statements 13:29
were made with knowledge that willful false 13:29
statements and the like so made are punishable 13:30
by fine or imprisonment, or both, under 13:30
section 1001 of Title 18 of the United States 13:30
Code." 13:30

Q. Okay. And what do you understand 13:30
you're saying when you signed your name to this 13:30
document with respect to the passage you just 13:30
read? 13:30

MS. NGUYEN: Objection, form. 13:30

A. I understand that, to the best of my 13:30
knowledge, all the statements that are made here 13:30
are my own -- are based on my own knowledge and 13:30
are true, and that all the statements made on 13:30
information and belief are believed to be true. 13:30

I did not say that I did not make 13:30
mistakes. I can make mistakes. 13:30

To the best of my knowledge, I 13:30
didn't think there was any mistake when I signed 13:30
the document. 13:30

Q. Okay. And in order to be in the 13:30

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best of your knowledge, does that include an 13:31
obligation on you to actually read every 13:31
sentence and every cite to make sure that the 13:31
cites are correct? 13:31
A. Yes. So checking the reference -- 13:31
these are -- you know, just checking and 13:31
checking the reference, making sure that the 13:31
content is there, but mistakes in actual 13:31
references can be made. It's a -- you know, 13:31
it's a typographical error. 13:31
The document is still that document. 13:31
Q. But nothing precluded you from being 13:31
able to tell that it was not paragraphs 392 13:31
through 402 that should have been cited? 13:31
MS. NGUYEN: Objection, form. 13:31
A. Nothing precluded me to -- 13:31
Q. Yeah. You had access to the 13:31
document, right? 13:31
A. Yes. 13:31
Q. And counsel didn't tell you, Don't 13:31
spend time checking that the cites are right, 13:31
right? 13:31
A. No. 13:32
MS. NGUYEN: Objection, form. 13:32

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Q. Okay. 13:32
A. Did not, and I like -- 13:32
Q. And there was no physical reason why 13:32
you couldn't check to see whether or not the 13:32
paragraphs that you're citing are, in fact, the 13:32
correct paragraphs, right? 13:32
A. There is no physical reason, but 13:32
it's an oversight. It's a mistake. 13:32
Q. I accept that it's a mistake. I'm 13:32
just trying to make sure that you weren't 13:32
precluded from avoiding the mistake by doing a 13:32
more diligent job than you did. 13:32
MS. NGUYEN: Objection, form. 13:32
A. I believe that I did a diligent job 13:32
to the extent of my knowledge. 13:32
And mistakes happen. There were 13:32
mistakes, and there have been mistakes in many 13:32
documents, and including other documents we 13:32
reviewed before from both sides, including -- 13:32
you know, so mistakes can happen. And I take 13:32
that as part of handling large volumes of 13:32
information. 13:32
Q. And 40 hours was more than enough 13:33
time for you to draft, review, make sure that 13:33

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all the information was correct for this 250 13:33
pages of declarations that were your three reply 13:33
declarations, right? 13:33
MS. NGUYEN: Objection, form. 13:33
A. In coming up with the 40 hours, we 13:33
sort of tried to do a ballpark. 13:33
But I did my due diligence, as far 13:33
as I'm concerned, to make sure that thing are 13:33
correct. If they weren't, it's just a mistake. 13:33
It wasn't intentional. Let's put it 13:33
this way. 13:33
Q. I'm not suggesting anything is 13:33
intentional or not intentional, I'm just trying 13:33
to understand whether you had done the work that 13:33
was necessary for you to put a sworn statement 13:33
to the PTAB averring things that are true when 13:33
you have already identified at least two 13:33
mistakes in two of the declarations that you've 13:33
identified. 13:34
A. I believe in the form of the content 13:34
that I have provided to the PTAB and in the 13:34
truthfulness of it. 13:34
References can be mistaken. There 13:34
are a lot of references. There are a lot of 13:34

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places where mistakes can happen, and it doesn't 13:34
change the content of what I was trying to 13:34
convey. 13:34
And that I did not make any 13:34
falsification regarding the content. The 13:34
content -- it was just a mistake. It was just 13:34
an oversight. 13:34
Q. Well, I'm going to show you what 13:34
we've marked as Exhibit 36, which was what was 13:34
marked as Exhibit 2005. It's is IPR2023-01379, 13:34
and I'll represent that it is the same exhibit 13:34
that is in all three IPRs. 13:34
I'm giving it to you. 13:35
Do you recognize Exhibit 2005? 13:35
A. Yes, I do. 13:35
Q. What is Exhibit 2005? 13:35
A. This is from the Symons article -- 13:35
what we called "Symons article" in our first -- 13:35
in our first meeting. 13:35
Q. Right. And what is it reflecting? 13:35
A. It is -- the title of the article, 13:35
"When Chatbots meet RPA bots," written by Senne 13:35
Symons, I think, maybe Senne Symons, and it was 13:35
published in RoboRana, and it is talking about 13:35

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the technology. 13:35
The text is, of course, there. If 13:35
you want, I can read it. 13:35
Q. You see that there is three 13:35
responses? 13:36
A. I see those, yes. 13:36
Q. Do those responses from Exhibit -- 13:36
Beigi Exhibit 36 correspond with what we have 13:36
marked as 31, 32 and 33? 13:36
A. The first comment -- you say, 13:36
"response," but it is a comment, right? 13:36
The first comment is the Exhibit 31, 13:36
written exhibit. 13:36
The second comment is reflected on 13:36
page 1 of Exhibit 32. 13:36
And the third comment is reflected 13:36
in Exhibit 33. 13:36
Q. And do you have any reason to 13:37
believe that Exhibit 2005 does not accurately 13:37
reflect the information that was posted at 13:37
Medium? 13:37
A. No, I don't have a reason. 13:37
MS. NGUYEN: Objection, form. 13:37
Q. Okay. And do you have any reason to 13:37

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believe that Exhibits 31, 32 and 33 do not 13:37
accurately reflect the information that was 13:37
posted in Medium? 13:37
A. I believe that -- 13:37
MS. NGUYEN: Objection, form. 13:37
A. I believe that the -- the way they 13:37
were, if I remember correctly, because I have to 13:37
go by my memory from the website, there was the 13:37
article, and at the end of the article, the 13:37
response to comments were made. 13:37
The way they are reflected here are 13:37
side-by-side. 13:37
And by "here," I mean the responses. 13:37
Q. But the content is accurate? 13:37
A. The content seems to be accurate. I 13:37
am not in front of the website at this time to 13:37
check it, but yes, I think it is. 13:38
Q. And when you saw the responses or 13:38
comments on the website below the article, was 13:38
that before or after you submitted the original 13:38
declarations in this lawsuit? 13:38
A. It was after the original 13:38
declaration. 13:38
Q. So it was after your deposition dec, 13:38

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right? 13:38
A. After my deposition. 13:38
Q. Right. So after your deposition, 13:38
you went and looked, and you saw that the 13:38
comments that are reflected in Beigi Exhibit 36, 13:38
which was submitted to the PTAB as Exhibit 2005 13:38
in each of the three IPRs, is actually a fair 13:38
and accurate representation of what was posted 13:38
at Medium, right? 13:38
MS. NGUYEN: Objection, form. 13:38
A. I saw those comments on the Medium 13:38
article at the bottom of the article. Not in 13:38
this fashion, of course, but at the bottom. 13:38
Q. And putting aside whether you agree 13:38
or disagree with the comments, the comments do 13:38
reflect how three individuals responded to the 13:38
Symons Medium post about when chatbots meet RPA 13:39
bots, right? 13:39
A. After -- 13:39
MS. NGUYEN: Objection, form. 13:39
A. Quite a bit after the fact, but yes. 13:39
Q. And we talked about one before by 13:39
Neha Negi which wanted to know how the chatbot 13:39
triggered the RPA bot, and while you didn't 13:39

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think it was material, you recognize that no one 13:39
really knows how the chatbot triggered the RPA 13:39
bot in detail, right? 13:39
MS. NGUYEN: Objection, form. 13:39
A. I know the exact code. Detail, I 13:39
guess, may describe that exact code. But -- but 13:39
I have an idea of how it generally is done. 13:39
Q. But you don't know for sure that it 13:39
was actually done the way that your idea thinks 13:39
that it was generally done, right? 13:39
MS. NGUYEN: Objection, form. 13:39
A. I have an idea of what is needed to 13:39
know about the process from what they have 13:40
reflected, and I don't think that any more 13:40
detail is necessary. 13:40
Q. Did you speak to Mr. Symons since 13:40
your last deposition? 13:40
A. I did not. 13:40
Q. Did you speak to Mr. Baetens since 13:40
your last deposition? 13:40
A. I did not. 13:40
Q. Did you speak to anyone that is an 13:40
author of any of the references that had been 13:40
submitted to the PTAB since your last 13:40

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deposition? 13:40

A. I did not. 13:40

Q. Did you speak to anyone who was an 13:40
author of any of the references that had been 13:40
submitted to the PTAB in these three IPRs at any 13:40
time since you've been engaged? 13:40

A. I have not. 13:40

Q. Did you ever speak to any of those 13:40
people at any time? 13:40

MS. NGUYEN: Objection, form. 13:40

A. I have not spoken to those people. 13:40

Q. In the second comment by Sachin 13:40
Prakash that is reflected on Beigi Exhibit 32, 13:41
he says, "Which RPA tool and chatbot tool are 13:41
you used and give descriptions to do this 13:41
automation." 13:41

Do you see that? 13:41

A. Yes. 13:41

Q. Can you tell me today what RPA tool 13:41
was used? 13:41

MS. NGUYEN: Objection, form. 13:41

A. I can't tell what RPA tool -- 13:41
well -- well, the RPA tool was their RPA tool, 13:41
which they wrote, and the chatbot tool is the 13:41

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chatbot that they wrote, from what I understand 13:41
from the article and from the -- what they have 13:41
said. 13:41
So -- 13:41
Q. I'm sorry, what was the chatbot 13:41
tool? 13:41
A. The chatbot tool is the chatbot that 13:41
Mr. Baetens' team had created. 13:41
Q. The Arinti chatbot? 13:41
A. Yeah. 13:41
Q. And the Arinti is related to 13:41
RoboRana, who wrote the RPA, right? 13:41
A. RoboRana published the IPA, and 13:42
they're related because they are associated with 13:42
each other in terms of working together as a 13:42
team, as Mr. Baetens put it, because he managed 13:42
the team. 13:42
So they were together -- working 13:42
together. 13:42
Q. They were also commonly owned. 13:42
A. I didn't know that. 13:42
Q. Well, he said in his dep. 13:42
A. Yeah, but I didn't pay attention to 13:42
the ownership because that's not -- for me, 13:42

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that's not important. 13:42

MS. NGUYEN: Objection, form. 13:42

Q. So when you talk about a third-party 13:42
service -- messenger service -- a third-party 13:42
messenger service, does ownership matter? 13:42

A. No. 13:42

Q. Okay. Is there a unique definition 13:42
of "third-party" to the people that work with 13:42
NLPs than with respect to the rest of the world? 13:42

MS. NGUYEN: Objection, form. 13:42

A. Who is the rest of the world? What 13:42
do you mean by that? 13:42

Q. People that speak the English 13:42
language. 13:42

A. The English language? My 13:42
understanding is that "third-party" means not 13:43
you, not the individual -- 13:43

Q. Or someone affiliated with you? 13:43

A. No, no. Because especially in 13:43
computer science, a third party doesn't -- 13:43
definitely does not mean that. 13:43

In computer science, which is the 13:43
scope of what we are looking at, a third-party 13:43
module, a third-party library, a third-party 13:43

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ownership is immaterial. It's the management of 13:43
that library and how do you -- you know, whether 13:43
it's a separate library or not, just that that 13:43
separation makes it third-party. It's in the 13:43
way they communicate. 13:43
Q. And that is based upon ordinary 13:43
English or because of some special skill you 13:43
have because of your NLP training? 13:43
MS. NGUYEN: Objection, form. 13:43
A. It's in context of computer science, 13:43
not just NLP, in computer science. 13:43
Q. So that is a unique definition that 13:44
you know as someone of skill in the art in 13:44
computer science, is that what you are saying? 13:44
A. I'm not sure if it's unique to 13:44
computer science, but I know of it in computer 13:44
science because, of course, I don't know many 13:44
other sciences. 13:44
Q. Have you heard of Instagram? 13:44
MS. NGUYEN: Objection, form. 13:44
A. I have heard of Instagram. 13:44
Q. Do you know who owns Instagram? 13:44
A. I think I have forgotten. But most 13:44
people do, but I don't have an Instagram 13:44

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account. 13:44
Q. Okay. I believe the answer is Meta. 13:44
Have you heard of Meta? 13:44
A. I have -- 13:44
MS. NGUYEN: Objection, form. 13:44
A. I have -- I have heard of Meta. 13:44
Q. Okay. Assume that Instagram is, in 13:44
fact, owned by Meta for purposes of this 13:44
question. 13:44
Have you heard of Facebook? 13:44
A. I have. 13:44
Q. Is it fair to assume that Facebook 13:44
is also owned by Meta? 13:44
A. Yes. That I know. 13:44
Q. So assuming that both Instagram and 13:44
Facebook are owned by Meta, if you put the 13:44
Facebook Messenger as a chatbot on Instagram, 13:45
would that be a third-party service for 13:45
Instagram -- 13:45
MS. NGUYEN: Objection -- 13:45
Q. -- under your understanding? 13:45
MS. NGUYEN: -- form. 13:45
A. It depends on the -- on the way it 13:45
was established, but it can be a third-party -- 13:45

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yes, it can be third party, and it depends on -- 13:45
if the same -- you know, if the entity treated 13:45
as one or not -- treated the two as one unit or 13:45
as, you know, individuals that communicate with 13:45
each other, then one can be a third party to the 13:45
other. 13:45
Q. So if there was two teams from 13:45
Instagram and from Facebook who worked together 13:45
because they're both owned by Meta, would the 13:46
integration of a Facebook Messenger as a chatbot 13:46
on Instagram be a third-party messaging service 13:46
in the context of these patents as you 13:46
understand it? 13:46
MS. NGUYEN: Objection, form. 13:46
A. That's a hypothetical, but if the 13:46
way you said it, which is two teams, right there 13:46
you made a separation. You said, "two teams." 13:46
Once you say two teams work 13:46
together, and if each of them worked on a 13:46
different aspect, then any one party can be 13:46
third party to the other's module, yes. 13:46
Q. And if the board were to disagree 13:46
with you and say because the two teams are 13:46
working together, as you describe Arinti and 13:46

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RoboRana, then the fact that they're commonly 13:47
owned means that they're not -- that the chatbot 13:47
used is not a third-party messaging service, how 13:47
would that impact your analysis of the '317 13:47
patent? 13:47
MS. NGUYEN: Objection, form. 13:47
A. I think if -- as long as we talk 13:47
about chatbot and RPA, they will be -- they can 13:47
be and, in most cases, will be a third party. 13:47
But you have to then create a new 13:47
entity, call it something else, Char-PA, 13:47
whatever, and you have to then say that this 13:47
whole thing was one module which was working 13:47
together. 13:47
But if you have a chatbot and you 13:47
have an RPA, then generally, these are two 13:47
things that are working together as third 13:47
parties or they can work together in one 13:48
association. 13:48
Q. So, again, I'm saying that if the 13:48
board rejects your analysis, what you said, and 13:48
instead agrees that a third-party messaging 13:48
service has to be a messaging service not 13:48
commonly owned by the two entities that are 13:48

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involved with the common team working on it, how 13:48
would it impact your analysis with respect to 13:48
the '317 patent and the Symons and Williams 13:48
references? 13:48
MS. NGUYEN: Objection, form. 13:48
A. With all due respect to the board, 13:48
if they feel that ownership -- physical of 13:48
owning -- owning something is going to make a 13:48
difference in the -- the way these modules 13:48
communicate with each other, I think that's two 13:48
different things we are looking at. 13:48
Ownership is a business thing, to 13:49
own something. These, the chatbot and the RPA, 13:49
are a chatbot and an RPA, as we have talked 13:49
about, and you could pick another RPA or you 13:49
could pick another chatbot. So you can combine 13:49
any which way you want. 13:49
And regardless of whether you look 13:49
at these two as one, there is always the -- 13:49
there is always reason to want to replace one of 13:49
them with another like thing. 13:49
So just owning it doesn't change 13:49
things like this. 13:49
Q. For purposes of the '317 patent and 13:49

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your analysis of the Symons and Williams 13:49
references in your opening petition, did you 13:49
take the view that the Arinti chatbot was a 13:49
third-party messaging service or not? 13:50
MS. NGUYEN: Objection, form. 13:50
A. Can you point me to what you're -- 13:50
what you're speaking about? 13:50
Q. I don't think we have your original 13:50
declarations in front of you, but they have been 13:50
previously marked, and I'll be happy to give 13:50
them to you. 13:50
A. Yes, kind of important. 13:50
Q. I'll withdraw that question and come 13:50
back to it. 13:50
In the meantime, I just want to 13:50
confirm that you looked at each of the Zatkovich 13:50
declarations that were marked as Exhibit -- I'm 13:50
sorry, strike that. 13:50
You looked at each of the Zatkovich 13:50
declarations that were marked as Exhibit 2014, 13:50
each of the IPRs that we marked as 30, 34 and 35 13:50
as part of your process of preparing and 13:50
submitting the IPR and reply declarations, 13:51
right? 13:51

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MS. NGUYEN: Objection, form. 13:51

A. I believe I did. 13:51

Q. And you also looked at Exhibit 2005, 13:51
which we have marked as Beigi Exhibit 36? 13:51

A. Yes. 13:51

Q. And you have no reason to doubt the 13:51
authenticity of the comments that are included 13:51
in Exhibit 36? 13:51

A. I do have problems with the way 13:51
they're presented next to each other, not in the 13:51
original form. 13:51

Q. The way that it was printed out is 13:51
the way the printer gave it to us, but you agree 13:51
with the substance is an accurate reflection of 13:51
the substance that you saw on the website? 13:51

A. I agree that those comments were 13:51
there. 13:51

Q. Okay. And you agree that 13:51
Exhibits 32, 33 and 31 are also available and on 13:52
the Medium website as comments to the When 13:52
Chatbots meet RPA article, correct? 13:52

A. I agree that they seem to be printed 13:52
out from the proper website. 13:52

Q. And their consistent with your 13:52

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understanding of what the comments were and when 13:52
they were posted? 13:52
A. Not when they were posted but when I 13:52
looked at them. 13:52
Q. No, I meant that it indicates, for 13:52
example, on 31 that it was posted on 13:52
September 10, 2018. 13:52
Exhibit 31. 13:52
A. Yes, I'm going on based on the 13:52
deposition exhibits, of course, because I don't 13:52
have the website in front of me, but I believe, 13:52
yes. 13:52
Q. Well, you double-checked the website 13:52
when you reviewed the exhibits, right? 13:53
A. Yes, I did. I looked for the dates 13:53
and I looked at it for the -- but what I am 13:53
seeing here is now the numbers, and I'm saying 13:53
that I believe they are. 13:53
But I'm saying I don't have the 13:53
website in front of me right now, but I believe 13:53
they are the same. 13:53
Q. Okay. You have no reason to believe 13:53
they are not? 13:53
A. I have no reason to believe they are 13:53

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not. 13:53
Q. Okay. 13:53
Okay. So now, we were going back to 13:53
your original declarations, which were 13:53
previously marked. 13:53
Okay. So I'm going to show you 13:53
Beigi Exhibit 7, which was previously marked 13:53
that way, which is the declaration of 13:53
Dr. Homayoon Beigi from IPR2024-00065 with 13:53
respect to U.S. Patent Number 11,558,317, and 13:53
this is what we called your original 13:53
declaration. 13:53
A. Thank you. 13:53
Q. So the question I had asked you 13:54
earlier that I withdrew and will restate is for 13:54
purposes of the '317 patent and your analysis of 13:54
the Symons and Williams references in your 13:54
opening position, did you take the view that the 13:54
Arinti chatbot was a third-party messenger 13:54
service, yes or no? 13:54
MS. NGUYEN: Objection, form. 13:54
Q. Do you understand the question? 13:54
A. I understand the question. I'm 13:54
looking at my declaration. 13:54

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Q. So I will let you know that it is 13:57
third-party target system that is in this 13:57
patent. It is the '732 patent that uses the 13:57
third-party messaging system. 13:57
So let's reformulate the question 13:57
and make it easier for you. 13:57
A. Okay. 13:57
Q. Do you -- are you saying that with 13:57
respect to Arinti as the chatbot and RoboRana as 13:57
the automated process, what are you saying is 13:58
the third-party web-based target system? 13:58
MS. NGUYEN: Objection, form. 13:58
Q. With respect to Symons. 13:58
In the patent you're looking at, the 13:58
'317 patent. 13:58
A. Well, the third party is a web-based 13:58
target. 13:58
Q. Correct. 13:58
A. Did you say -- right. 13:58
MS. NGUYEN: Counsel, since we are 13:58
talking about the '317 patent, do you have 13:58
the '317 patent to provide Dr. Beigi? 13:58
MR. MACEDO: Certainly can. 13:58
Absolutely. 13:58

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Thomas, you want to pull that? 13:58

Q. We previously marked as Exhibit 10 13:59
U.S. Patent 11,558,317 B2, and here is your 13:59
original exhibit. 13:59

If you look at claim 16 at the top 14:00
of column 27 of Exhibit 10, it says, "with 14:00
respect to third-party web-based target system," 14:00
around line 3. 14:00

It's on the next column, Dr. Beigi. 14:00

A. I'm going to have to read that. 14:00

Q. Do you see where I am referring? 14:00

A. Yes, I see it. I'm going to read 14:00
it. 14:00

Q. What are you relying on for purposes 14:00
of your combination between Symons and Williams 14:00
as being the third-party web-based target system 14:01
in the context of claim 16 of the '317 patent? 14:01

A. Do I have Williams? Do I have 14:02
Williams? 14:02

Q. We can give you Williams, certainly. 14:02

A. Would you kindly? 14:02

Q. Absolutely. 14:02

And your discussion is with respect 14:02
to element 1[e] on page 45 and 46, which is 14:02

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page 46 and 47 of the exhibit, marked as Beigi Exhibit 7. 14:02 14:02

So I'll reformulate the question from claim 1. 14:03 14:03

In claim 1, in element 1[e], it says, "wherein the automation process is performed with respect to a third-party web-based target system." 14:04 14:04 14:04 14:04

And you have that at the bottom of page 45 of your Exhibit 7. 14:04 14:04

And is there any aspect of the Symons references that you read as being the web-based third-party -- I'm sorry, the third-party web-based target system? 14:04 14:04 14:04 14:04

Look at paragraph 91 and 92 to help you. 14:04 14:04

MS. NGUYEN: Objection, form. 14:04

A. Well, I can -- paragraph 88 of my declaration (as read), The RPA bot automatically opens the browser and enters the details. Which is basically the title of the figure that's thereto and enters the details -- opens the browser and enters the details, basically, that would be an example of a web-based target 14:04 14:04 14:04 14:04 14:04 14:04 14:04 14:04 14:05

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system. That's an example. 14:05

And, also, the reason I was asking 14:05

for Williams is that Williams also talks about, 14:05

you know, communicating with web-based. 14:05

Q. Right. But I'm not asking you about 14:05

a web-based target system, I'm asking you about 14:05

a third-party web-based target system which 14:05

appears in 1[e]. 14:05

And there is no element of Symons 14:05

that you identify as being the third-party 14:05

web-based target system with respect to element 14:05

1[e], correct? 14:05

MS. NGUYEN: Objection. 14:05

Q. In -- with respect to the '317 14:05

patent in your Beigi Exhibit 7. 14:05

A. I believe that it would have been 14:05

obvious. And, again, it would have been obvious 14:05

the fact that you can open a browser, that you 14:05

can go to a pay -- a third party, just like you 14:05

would, let's say, to RPA itself. You can open a 14:06

browser and you can go to a third-party link, 14:06

and POSITA would have known that that is 14:06

something that they would be able to do easily. 14:06

And in terms of the third party and, 14:06

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also -- so together, also with Williams, that 14:06
talks about third-party systems that are used. 14:06
It just makes sense that you would be able to do 14:06
that. 14:06
Q. And your total analysis that 14:06
reflects what you just summarized is merely set 14:06
forth in paragraph 91 and 92 of your declaration 14:06
that we have marked as Beigi Exhibit 7, correct? 14:06
MS. NGUYEN: Objection, form. 14:06
A. This is partly saying what I'm 14:07
saying. 14:07
But I'm saying that, in addition to 14:07
what is here, which is actually disclosed by 14:07
Williams, and the same as we just talked about, 14:07
because the mechanism is there, and because 14:07
Williams already talks about it, and because 14:07
Symons already has the capability of opening a 14:07
browser, and because a POSITA would have wanted 14:07
to offload an automation process to a 14:07
third-party system, because of all of these 14:07
things that we just talked about, it makes it 14:07
natural for a POSITA to be able to want to do 14:07
that in order to trigger a third-party web-based 14:07
target system so that they will be able to do an 14:08

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observation that they wouldn't be able to do 14:08
that's in-house. 14:08
Q. And none of the analysis of the 14:08
"becauses" that you just said were presented 14:08
with respect to element 1[e] in your 14:08
declaration, correct? 14:08
MS. NGUYEN: Objection, form. 14:08
Q. With respect to the Symons and 14:08
Williams combination. 14:08
A. Why do you say that? 14:08
Q. There is two paragraphs listed -- 14:08
A. Two paragraphs that you just said. 14:08
Q. Right. None of those talk about -- 14:08
neither paragraph 91 or 92 talks about 14:08
motivation to combine, does it? 14:08
A. It says that Williams discloses that 14:08
robots can be configured to interface directly 14:08
with applications through pre-existing 14:08
application programming interfaces, and the 14:08
platforms are equally able to work through 14:08
systems' graphical interfaces, including web 14:08
browsers. 14:08
So it does say that, right, 14:08
including web browsers. 14:09

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And Citrix terminal sessions. 14:09
Working through a web browser means interfacing 14:09
with a third-party web-based target system. 14:09
So the fact is that Williams talks 14:09
about interplay, talks about working with other 14:09
libraries, for example. 14:09
Did I get Williams from you? 14:09
Q. We are getting it. 14:09
But my question is, where you say 14:09
the other things that you were saying -- I want 14:09
you to focus on your deck -- 14:09
A. Yes. 14:09
Q. -- and point to a paragraph in the 14:09
deck that explains the obviousness combination 14:09
beyond paragraphs 91 and 92. 14:09
I don't want your new obviousness 14:09
combination today or your new motivation today. 14:09
I want to know the basis of this IPR, which was 14:09
relying upon your declaration to conclude that 14:09
it would be obvious performing the automation 14:09
process on a web-based target system in 14:10
paragraph 92, what's the support that you have 14:10
in the declaration besides paragraph 91 and 92? 14:10
MS. NGUYEN: Objection, form. 14:10

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A. So if we are back to 1[b], 14:10
basically, the discussion on 1[b] in here, in 14:10
paragraph 92, I say (as read), As discussed for 14:10
elements 1[b], Symons and Williams render 14:10
obvious performing the automation process on a 14:10
web target system. 14:10
And if you go back to 1[b], which is 14:10
page 37 of -- 38 of the exhibit and PDF 37, or 14:10
print 37, I discuss -- I discuss that basically 14:10
here. 14:11
So we can go through this. But 14:11
that's what I am referring to. And, basically, 14:11
like this is an example that we gave. This is 14:11
the Symons -- that we talked about. Symons 14:11
automates the process of creating an email 14:11
signature for the user. And in response to the 14:11
user instructions, Symons determines the 14:11
implementation of the automation process. 14:11
Then I talk about how -- 79, 14:11
paragraph 79. 14:11
Q. Dr. Beigi -- 14:11
A. -- I talk about that -- 14:11
MS. NGUYEN: Counsel, please let him 14:11
finish his response. 14:11

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Q. Dr. Beigi, I'm happy to let you 14:11
continue, but I just want you to focus on the 14:11
question I asked, which relates to the 14:11
combination resulting in a web-based target 14:12
system, in particular, a third-party web-based 14:12
target system. 14:12
I believe that the only place where 14:12
you discuss that in 1[b] is paragraph 83, in 14:12
contrast, ends in multiple requests, which is 14:12
the paragraphs you were pointing to. 14:12
So if you just confirm that before 14:12
you continue, that you're talking about my 14:12
question, not a different question. 14:12
A. I'm not talking about a different 14:12
question. 14:12
MS. NGUYEN: Objection, form. 14:12
A. I'm not talking about a different 14:12
question. I think the rest of it is relevant. 14:12
I think 79 is relevant. 14:12
I think what I talked about in -- 14:12
and with respect to 1[e], that we just read, 14:12
that Williams tells us that you can use a 14:12
web-based target system is relevant. 14:12
And I think that it is relevant 14:12

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2 that, in context, that the automation RPA 14:12
3 basically can offer a return on investment, and 14:12
4 the fact that you would want to, based on what 14:13
5 Williams says, for example, do third-party 14:13
6 processes. 14:13
7 And then to your -- and then if you 14:13
8 continue, that basically sets the stage on why 14:13
9 you want to combine the two, and that's the 14:13
10 combination you're asking, and why you would 14:13
11 like to have the third-party web target system 14:13
12 used by the combination of Symons and Williams. 14:13
13 Q. So in [b], the only place where you 14:13
14 talk about the third-party -- I'm sorry, the 14:13
15 only place where you talk about the web-based 14:13
16 target system is paragraph 83, correct? 14:13
17 Where it starts "Additionally"? So 14:13
18 that's in contrast to what was above, right? 14:13
19 A. Yes. Specifically what I'm saying 14:14
20 is I'm actually talking about the web-based 14:14
21 target system here, but if you go to where we 14:14
22 were sort of referring back to here, we are 14:14
23 referring to the whole element, and I'm talking 14:14
24 about why you would be -- a POSITA would have 14:14
25 wanted to combine the two and then come to the 14:14

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conclusion that a web-based target system would 14:14
be something that -- so all of that is important 14:14
in, for example, the conversation about whether 14:14
it would save time and effort, all of these 14:14
things become important. 14:14
Because if that's your objective and 14:14
you would like to reduce the amount of work that 14:14
you have to do and have better return, these 14:14
things become a preamble to why the motivation 14:14
that you would want to combine and you would 14:14
like to have a third-party target. 14:14
So that's what I am trying to get 14:14
at. 14:14
Q. Okay. In paragraph 83, where it 14:14
says, "Additionally," do you identify any 14:15
motivation to add a web-based target system as 14:15
disclosed in Williams to Symons, focusing on 14:15
paragraph 83? 14:15
MS. NGUYEN: Objection, form. 14:15
A. Now that I've read it, would you 14:15
please ask the question again? Sorry. 14:15
Q. In paragraph 83 of what we have 14:15
marked as Beigi Exhibit 7, your declaration from 14:15
the 00065 IPR with respect to the '317 patent, 14:15

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do you identify any motivation to combine 14:15
Williams with Symons to utilize a web-based 14:15
target system? 14:15
A. In paragraph 83? 14:15
Q. Yes. 14:16
A. Yes, it discloses implementing the 14:16
automation process on a web-based target system. 14:16
Williams talks about that. 14:16
And you haven't given me Williams, 14:16
by the way. 14:16
Q. But I said motivation, focus on 14:16
motivation, why -- would you explain why someone 14:16
of ordinary skill in the art at the time of the 14:16
invention would have been motivated to combine 14:16
Williams with Symons to obtain a web-based 14:16
target system in paragraph 83? 14:16
I'm not asking you where else, I'm 14:16
asking you about 83. 14:16
A. But paragraph 83 is in -- is in 14:16
context. You're asking me to carve out one 14:16
thing out of my declaration and say just look at 14:16
this one paragraph. 14:16
Q. That is exactly what I am asking to 14:16
you do. 14:16

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A. Then Williams discloses it, and 14:16
Symons -- so all of the robots can be configured 14:16
to interface directly with the application to 14:16
pre-existing application program interfaces. 14:16
These platforms are equally able to 14:17
work through systems' graphical interface and 14:17
including web browser, as Williams says, and 14:17
Symons wants to -- 14:17
Q. In paragraph 83, do you see any 14:17
reason that would be a motivation to combine in 14:17
contrast to recognizing the disclosure of 14:17
Williams? 14:17
MS. NGUYEN: Objection to form. 14:17
Please let the witness finish 14:17
responding. 14:17
A. I am because at the end, I'm saying, 14:17
"Thus, Symons and Williams render obvious 14:17
element 1[b]." 14:17
So it brings in Symons. It's not 14:17
just by Williams, right? 14:17
And in that paragraph, although I 14:17
started with saying what Williams and -- allows 14:17
us to do, the whole -- many paragraphs before 14:17
that are motivating it, motivating the fact that 14:17

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you do want something which is efficient, you do 14:17
want the -- you want something that would be 14:17
done in less amount of time with less amount of 14:17
investment, and that is motivation enough for a 14:18
POSITA. 14:18
When they know they can do it using 14:18
a web-based target system, which Williams 14:18
teaches, and they know that Symons already knows 14:18
how to implement a web-based target system as it 14:18
teaches, the motivation is plenty to combine 14:18
because of this -- because of all of the things 14:18
that they will gain. 14:18
Q. So are you -- so are you saying that 14:18
Symons teaches the web-based target system or 14:18
are you saying that Symons needs to be modified 14:18
by Williams to teach the web-based target system 14:18
in your original declaration? 14:18
MS. NGUYEN: Objection, form. 14:18
A. I say that Symons has the 14:18
capability, as it says, to use a web-based 14:18
target system because it does open a browser and 14:18
Williams says that you can open that web browser 14:18
and do something on a web-based target system. 14:18
Therefore, the combination will 14:19

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definitely do it. However, Symons itself also 14:19
shows that you can open a web-based system -- 14:19
Q. Okay. 14:19
A. -- by opening a web browser. 14:19
Q. So what I want to know is, just 14:19
going to your declaration -- it's a very simple 14:19
question -- are you saying that Symons discloses 14:19
a web-based target system? 14:19
A. I say that Symons discloses opening 14:19
a web browser and doing activity in it, which 14:19
could include going to a web-based -- basically, 14:19
it is a web-based target, so what is a web-based 14:19
target system? 14:19
It is something that runs in a 14:19
browser, and Symons already shows that. And 14:19
Williams says more about other types of complex 14:19
things that you can do. 14:20
But I think Symons shows it, 14:20
Williams completes it. 14:20
Q. Okay. So I want you to focus on my 14:20
question and just answer "yes" or "no." 14:20
Do you identify in the '317 patent 14:20
with respect to claim 1 some aspect of the 14:20
Symons disclosure which you think is the 14:20

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web-based target system? 14:20

MS. NGUYEN: Objection to form. 14:20

For the fourth time, please let the 14:20

witness answer completely. 14:20

A. Which is the web-based? 14:20

Q. According to your read. 14:20

A. So which can be is different from 14:20

which is. 14:20

Q. No, is. 14:20

A. Because Symons can access a web 14:20

browser and can trigger a web browser, hence, it 14:20

can trigger a third-party web-based system. 14:20

And because it knows how to 14:21

communicate -- let's say, with an RPA -- let's 14:21

say the third-party RPA that it uses, then it 14:21

should be able to do exactly the same thing 14:21

within a web browser on a link that is sitting 14:21

somewhere else and running some other automation 14:21

on a web-based target system. 14:21

Q. Do you understand the difference 14:21

between "disclosing" versus "rendering obvious"? 14:21

MS. NGUYEN: Objection, form. 14:21

A. The disclosing and -- 14:21

Q. Versus rendering obvious. 14:21

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A. Legally or just in English? 14:21
Q. Yes, legally. For purposes of the 14:21
analysis that you have done in these entire IPR 14:21
proceedings, all three of them, do you 14:21
understand the difference between a reference 14:21
disclosing the element versus something 14:22
rendering obvious? 14:22
A. Yes, I do. 14:22
Q. So if you understand that, I want 14:22
you to explain to me does Symons without 14:22
Williams, without anything else, disclose the 14:22
claimed web-based target system? 14:22
Not something that can, not 14:22
something that's modified, but the specific 14:22
claim element of a web-based target system. 14:22
MS. NGUYEN: Objection, form. 14:22
A. I don't understand because I'm 14:22
actually relying on both. Why am I here -- 14:22
Q. Because I'm asking you -- 14:22
A. -- trying to tell you whether one of 14:22
them -- because that's why I didn't rely on 14:22
that. I didn't rely just on Symons, but I'm 14:22
telling you that because Symons has the 14:22
capability to run something -- I'm going as far 14:22

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as that. But I can't go any further than that, 14:22
because I'm not relying on it. 14:22
What I am saying is, it can do it 14:22
because it is capable of running something on a 14:22
browser and opening it. That is all I can say. 14:23
Q. I'm not asking about can, I'm asking 14:23
do. Okay? 14:23
So I want you to focus with me. All 14:23
I'm trying to distinguish is between whether 14:23
you're saying this element reads on Symons or 14:23
you have to modify Symons in view of Williams or 14:23
something else to find the element. 14:23
So I want to know if you're saying 14:23
that Symons discloses a web-based target system, 14:23
and if you are saying it does, what is the 14:23
web-based target system which you are saying 14:23
Symons discloses as reflected in the declaration 14:23
that we have marked as Beigi Exhibit 7. 14:23
MS. NGUYEN: Objection, form. 14:23
A. I'll use the terminology you used. 14:23
It doesn't specifically disclose that direct by 14:23
itself, but it makes obvious that it can be done 14:23
because it is disclosing all the elements, and 14:23
Williams definitely discloses the web -- the 14:23

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web-based target system and the use of it as a third-party system. 14:24

And, in fact, then the combination, which I relied on, is something that is obvious to a POSITA. 14:24

MS. NGUYEN: Counsel, can we take a break? 14:24

Q. I need to finish this line and then I'll be happy to take it, but I'm not done. 14:24

I want to make sure it's crystal clear, we all agree that you are not asserting in Beigi Exhibit 7 that Symons itself discloses a web-based target system for the purposes of the claims, correct? 14:24

MS. NGUYEN: Objection, form. 14:24

A. Symons discloses interfacing with a web-based target system which makes it obvious -- by itself makes it obvious that you would be able to run a third-party automation on a web-based target system. 14:25

Williams adds to that, and if in case you don't agree with this, Williams adds to that and specifically discloses the use of third-party target systems that can, together 14:25

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with Symons, which is what I rely on, describe 14:25
the third-party web-based target system. 14:25
Q. So with respect to Symons without 14:25
Williams, the only paragraphs I see are 75, 76 14:25
and 77. 14:25
Is there any other paragraphs where 14:25
you're discussing what Symons discloses without 14:25
being modified by Williams with respect to 14:25
web-based target system? 14:25
MS. NGUYEN: Objection, form. 14:26
A. Paragraph 88. 14:27
Q. 88 is not with respect to element 14:27
1[b], but let's look at it. 14:27
88 is with respect to element 1[d], 14:27
and what in 88 is identifying Symons disclosing 14:27
a web-based target system? 14:27
A. Symons discloses the fact that the 14:27
RPA can automatically open a browser and enter 14:27
the details, and the RPA bot enters the user's 14:27
name and the rest. 14:27
So -- and additionally, the RPA bot 14:27
automatically clicks on certain GUI elements and 14:27
so on. 14:27
But that is -- you know, 88 shows 14:27

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that Symons is aware of opening a browser and 14:27
doing things in the browser. 14:28
Q. And in 88, you are referring to the 14:28
Cronos email generator, correct? 14:28
A. Yes. 14:28
Q. So are you asserting that the Cronos 14:28
email generator is the web-based target system? 14:28
Because I don't see that anywhere 14:28
in -- under 87, 88, 89 or 90. 14:28
MS. NGUYEN: Objection, form. 14:28
A. No. What I'm saying is that Symons 14:28
as a whole is aware of automatically opening a 14:28
browser, triggering it and running something in 14:28
the browser because Symons is disclosing how to 14:28
interact with the browser, and, like I said, the 14:28
motivation is all the motivation that I gave in 14:28
the previous paragraphs that a POSITA would have 14:28
been motivated to use this capability to run 14:28
something which is a third party that didn't 14:29
have to implement themselves, and Williams adds 14:29
to that and says, Well, I know how to do that. 14:29
Williams says that you can actually use it, 14:29
target -- web-based target system. 14:29
Q. I don't want to talk about 14:29

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obviousness with Williams. I'm trying to 14:29
understand what is the disclosure that you are 14:29
relying upon in Symons as being a web-based 14:29
target system. 14:29
Because as I understand what you 14:29
wrote in paragraphs 87, 88, 89 and 90, you're 14:29
requiring a combination with Williams in 14:29
paragraph 90 as discussed in element 1[b] for 14:29
Symons and William to render obvious 14:29
implementing the automation process on a 14:29
web-based target system. 14:29
And I don't see you calling out any 14:29
specific structure in Symons as the web-based 14:29
target system. 14:29
And, further, when you go on to the 14:29
third-party web-based target system, you don't 14:30
call out anything in Symons. 14:30
So I am trying to understand -- and 14:30
it's very simple -- are you saying in your 14:30
original declaration that there is some 14:30
disclosure in Symons which meets a web-based 14:30
third-party target system or are you saying 14:30
Symons needs to be modified as disclosed for 14:30
whatever reason to teach a web-based third-party 14:30

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target -- I'm sorry, a web-based target system? 14:30

MS. NGUYEN: Objection, form. 14:30

A. I'm saying that Symons has all the 14:30
elements that it discloses, including opening a 14:30
browser and operating in it, as a -- and Symons 14:30
makes -- basically, because it includes all the 14:30
elements and because of all the -- all the 14:30
reasoning that I gave that it would want to be 14:30
successful and would be -- would want to use the 14:30
least amount of work, it makes it obvious. 14:31

But Williams completes that, so this 14:31
is what I'm saying. I don't know how else to 14:31
say it. 14:31

Q. Okay. The easy way to say is, no, I 14:31
do not disclose anything in Symons, which is the 14:31
web-based target system, or yes, I disclosed 14:31
this particular part of Symons as being the 14:31
web-based target system. 14:31

That is all I'm trying to get from 14:31
you. I'm not trying to get your obviousness 14:31
argument. You said it ten times. I get it. 14:31

I want to understand is there a 14:31
direct read in Symons on a web-based target 14:31
system. Not whether you can use Symons to go to 14:31

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a web-based target system, but is there anything 14:31
that you've identified? 14:31
And I believe in your prior answer, 14:31
you said that the email generator is not the 14:31
web-based target system. 14:31
So I want to know what, if anything, 14:31
in Symons -- not how you're modifying it, but 14:31
just if there is any specific software or 14:32
something shown in Symons and nothing else which 14:32
you think meets web-based target system for 14:32
purposes of the '317 patent? 14:32
MS. NGUYEN: Objection, form. 14:32
A. Again, because it has the capability 14:32
of accessing your browser and triggering it and 14:32
running things on it, it is showing that 14:32
capability. 14:32
I'm not -- it is disclosing 14:32
something, and that disclosure is the thing I'm 14:32
talking about. That disclosure of dealing with 14:32
a web browser -- which is a web-based target 14:32
system, by the way, the web browser -- 14:32
Q. Are you reading on the web browser 14:32
as the web-based target system? Are you saying 14:32
that Symons discloses a web browser and, 14:32

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therefore, it has a web-based target system? Is 14:32
that your read? 14:32
MS. NGUYEN: Objection, form. 14:32
Please let him finish responding. 14:33
MR. MACEDO: Well, he isn't 14:33
responding is the problem, Counsel. 14:33
MS. NGUYEN: You are interrupting 14:33
him, so you are not allowing him to get to 14:33
the response. 14:33
MR. MACEDO: No, no, no. Just a 14:33
simple -- 14:33
MS. NGUYEN: Yes, you are, you're 14:33
interrupting. No, it is a simple -- stop 14:33
interrupting him. 14:33
MR. MACEDO: Listen, counsel, I 14:33
really think that we are going to take a 14:33
break now. 14:33
MS. NGUYEN: I agree. I have been 14:33
asking for a break for 30 minutes. 14:33
MR. MACEDO: Okay. And when we go 14:33
off the record -- 14:33
MS. NGUYEN: What would you like to 14:33
do? 14:33
MR. MACEDO: -- I'm going to ask 14:33

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that you speak to your witness to get him 14:33
to actually answer the questions I am 14:33
asking. 14:33
MS. NGUYEN: I am not allowed -- 14:33
MR. MACEDO: Instead of giving me a 14:33
half an hour -- 14:33
MS. NGUYEN: -- unlike the last 14:33
deposition, I am not allowed -- 14:33
MR. MACEDO: So, Counsel -- 14:33
MS. NGUYEN: -- to speak with him 14:33
about the substance of this proceeding. 14:33
If you're suggesting that's 14:33
something I do -- 14:33
MR. MACEDO: Counsel, I -- 14:33
MS. NGUYEN: Let's take a break. 14:33
MR. MACEDO: -- am saying that you 14:33
should not discuss the substance but you 14:33
should -- 14:33
MS. NGUYEN: You just told me to 14:33
talk to him -- 14:33
MR. MACEDO: Yes. 14:33
MS. NGUYEN: -- about the substance 14:33
of his identity. 14:33
MR. MACEDO: And if you don't 14:33

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want -- if you don't know -- 14:33

MS. NGUYEN: If I don't want to 14:33

break the rules? 14:33

MR. MACEDO: Okay. Counsel, can I 14:33

finish, please? 14:33

I am telling you that it is 14:33

appropriate, and I'm giving you 14:33

permission, to talk to him for the 14:33

purposes of getting him to properly answer 14:33

the question. Not give him the answer. 14:33

He can answer the question whatever 14:34

he thinks, like you don't need to coach 14:34

him on that, but he should answer the 14:34

question that I'm asking. 14:34

Because the question that I've been 14:34

asking for the last half an hour while you 14:34

have been waiting to take the break is to 14:34

figure out whether or not there is 14:34

something in Symons that he is reading on 14:34

as the web-based target system -- 14:34

MS. NGUYEN: He's been answering 14:34

your questions -- 14:34

(Reporter seeks clarification.) 14:34

MR. MACEDO: -- target system, and 14:34

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he can't answer that to me. 14:34

And that is a problem. And if it's 14:34

too hard to do it with us, then, if 14:34

necessary, we can call the board and see 14:34

if maybe the board can help us get the 14:34

correct answer to this question. 14:34

Because right now, I don't have a 14:34

definitive answer as to whether he is 14:34

reading on any particular part of Symons 14:34

as being the web-based target system. 14:34

And it's a very simple question. He 14:34

should be able -- it's not obvious to me 14:34

from his declaration if he is reading on 14:34

anything. I haven't seen anything that he 14:34

pointed to in his declaration as being the 14:34

web-based target system. 14:34

So I'm finding it very problematic 14:34

that he has been giving these wishy-washy 14:35

answers where before in his prior 14:35

deposition he was able to give more direct 14:35

answers. And he is not doing that now. 14:35

So -- 14:35

THE WITNESS: I apologize, you're 14:35

talking about me, so I should be able to 14:35

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interject. 14:35

I'm not being wishy-washy. I 14:35

apologize, I'm not. And I told you I read 14:35

off exactly what I read off, which is the 14:35

RPA bot automatically opens browser and 14:35

enters details. 14:35

That is the way that Symons tells 14:35

you how you can communicate with something 14:35

learning inside the browser. 14:35

What else do you need from me other 14:35

than telling you -- you're asking me on 14:35

what are you talking about, and I'm 14:35

talking exactly showing you the location, 14:35

telling you about it, and I'm saying it is 14:35

that Symons discloses that you can open a 14:35

browser and enter details, which means 14:35

you're running something on a browser. 14:35

Now -- let me continue, pleas. 14:35

Now, whether that browser is running 14:36

something locally, running remotely, 14:36

running -- it is a web-based target system 14:36

because it is a browser, web-based, and 14:36

it's a target system. That's where you're 14:36

entering the details. 14:36

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I don't know how else to answer this. 14:36

BY MR. MACEDO: 14:36

Q. Is Word on Mr. Symons computer a web-based target system in your claimed read of the '317 patent? Yes or no, or I can't -- I don't know, I can't recall -- 14:36

MS. NGUYEN: Objection, form. 14:36

Q. -- or I can't answer. 14:36

It's a simple, short answer. 14:36

A. Are we talking about Microsoft Office Word? 14:36

Q. I'm talking about the Microsoft Word where they paste the email signature. 14:36

In your view, are you offering that up as a web-based browser system -- a web-based target system for purposes of your read of the '317 patent on the Symons and Williams combination? 14:36

A. Prior to that, the entering of the details in the -- 14:36

Q. I'm just asking about Word. I'm not asking -- 14:37

A. Your not allowing me to. You're not 14:37

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allowing me to. 14:37

Q. No, because you are not answering my 14:37

question. 14:37

MS. NGUYEN: Objection, form. 14:37

A. It's in context. 14:37

MS. NGUYEN: He is answering the 14:37

question. 14:37

Can we take a break? 14:37

BY MR. MACEDO: 14:37

Q. Dr. Beigi, I want you to understand 14:37

very simply and clearly, I'm not asking you 14:37

about context, I'm not asking you about some 14:37

other part. I'm asking you about one discrete 14:37

element, if you are reading on that element or 14:37

not reading on that element. 14:37

I think you're not reading on that 14:37

element. I tried to choose an obvious one to 14:37

make is very easy for you to say, No, that isn't 14:37

the web-based target system because it isn't the 14:37

web-based target system, and isn't what you read 14:37

on as the web-based target system. 14:37

I was trying to make the question 14:37

very simple for you so you could actually answer 14:37

the question that I'm asking. 14:37

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You are going out of your way not to 14:37
answer those questions. I'm not going to ask a 14:37
question right now. I am going to go on break. 14:37
When we come back, we can see how to handle 14:37
this. 14:37

MR. MACEDO: Off the record. 14:37

(Recess.) 14:37

(Exhibit 37, article entitled "Using 14:37
artificial intelligence to optimize the 14:53
value of robotic process automation," 14:53
marked for identification, as of this 14:53
date.) 14:53

BY MR. MACEDO: 14:54

Q. Dr. Beigi, during the break, we 14:56
marked as Exhibit 37, WhatFix Exhibit 1011, the 14:56
Williams article, just so you have a copy. 14:56

I would like for you to turn in 14:56
Beigi Exhibit 7 to page 27. 14:56

Do you see the title A says, 14:56
Claims 1 through 20 are obvious over Symons and 14:56
Williams. 14:56

A. Yes. 14:56

Q. What is your understanding of what 14:56
that means? 14:56

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MS. NGUYEN: Objection, form. 14:56

A. What do you mean, "what that means" 14:56
there? 14:56

Q. It's your report. 14:56

A. Right. 14:56

Q. I want to know what you think you're 14:56
saying when you say claims 1 through 20 are 14:56
obvious over Symons and Williams? 14:56

A. That means given the content of 14:56
Symons and Williams, these claims are obvious to 14:57
a POSITA. 14:57

Q. Okay. And are you saying that 14:57
Symons by itself does not disclose the claims? 14:57

MS. NGUYEN: Objection, form. 14:57

A. Like I said previously, I have made 14:57
arguments where Symons does disclose most of the 14:57
content, and I am relying on Williams to 14:57
complete it to -- so I'm relying on the 14:57
combination, as you can see here. 14:57

Q. Okay. What aspects of Symons are 14:57
you saying are missing in Symons that you have 14:57
to rely upon Williams with respect to claim 1 of 14:57
the '317 patent based upon your report that we 14:57
marked as Beigi Exhibit 7? 14:57

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MS. NGUYEN: Objection, form. 14:58

Q. So let me rephrase the question. 14:58

Are there any aspects of claim 1 14:58

which you recognize are not disclosed in Symons 14:58

such that you have to rely upon Williams to find 14:58

the missing aspects from claim 1 of the '317 14:58

patent according to your report that we have 14:59

marked as Beigi Exhibit 7? 14:59

MS. NGUYEN: Objection, form. 14:59

A. I think Symons has all of these 14:59

capabilities that are in -- I believe that 14:59

Symons includes all these capabilities that are 14:59

listed in claim 1. 14:59

Q. And to the extent that you believe 14:59

that it has it, you disclosed it in your deck, 14:59

correct? 14:59

A. I believe I did, yes. 14:59

Q. And so why is this raised as an 15:00

obviousness combination instead of an 15:00

anticipation? 15:00

A. Because I am unsure of certain ways 15:00

that a third-party may interpret my arguments, 15:00

and that's why I am -- I want to make sure 15:00

that -- that the arguments I was -- is 15:00

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complemented, and in that sense, I'm using an 15:00
obviousness instead of anticipation. 15:00
Q. And to the extent that you're 15:00
relying on an obviousness argument, what aspects 15:00
of Symons are you proposing a POSITA would be 15:00
motivated to change in view of Williams in your 15:00
declaration to make it no longer -- or to make 15:01
it obvious for claim 1 of the '317 patent. 15:01
MS. NGUYEN: Objection, form. 15:01
A. To make it obvious, you said? 15:01
Q. Yes. In other words, you're saying, 15:01
as I understand it, that Symons discloses all of 15:01
the elements of claim 1 of the '317 patent, but 15:01
in the alternative, it would be obvious to a 15:01
POSITA to modify Symons in view of William to 15:01
capture some missing elements. 15:01
Is that a correct summary of your 15:01
opinion? 15:01
MS. NGUYEN: Same objection. 15:01
A. In a way, yes, where what -- what 15:01
I'm trying to say is that William describes in 15:01
more detail certain things, which then 15:01
compliment Symons, and together, then they can 15:01
render these claims obvious. 15:01

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So it is a compliment. In some 15:02
cases, it describes it in more detail and, you 15:02
know, that's really the reason that I combine 15:02
with Williams. 15:02
The components exist in Symons, but 15:02
there are places where Williams expands on 15:02
things where it makes it more clear in their 15:02
usage. 15:02
Q. So in your opinion, nothing needs to 15:02
be changed in Symons, you just need the 15:02
additional detail about what Symons actually 15:02
teaches using Williams, is that your view? 15:02
MS. NGUYEN: Objection, form. 15:02
A. Williams is presenting some 15:02
supplemental information where I think together, 15:02
they are stronger -- together, they are a 15:03
stronger conveyance of what can be done. 15:03
But Symons by itself contains all of 15:03
that information. 15:03
What I'm trying to say is that 15:03
Williams basically strengthens. Williams 15:03
describes certain things that are present in 15:03
Symons but not possibly well described or a 15:03
completely described. So that, you know, 15:03

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Williams does that and helps in covering those 15:03
in more detail. 15:03
Q. Okay. So if you look at 15:03
paragraph 38 of your declaration. 15:03
A. The original declaration? 15:03
Q. Yes, we are looking at Beigi 15:03
Exhibit 7. 15:03
You see where it says, "To assess 15:04
obviousness, I understand that I am to consider 15:04
the scope and content of the prior art, the 15:04
differences between the priority art and the 15:04
claim, and the level of ordinary skill in the 15:04
art and any secondary considerations to the 15:04
extent they exist." 15:04
A. Yes. 15:04
Q. So what I'm trying to have you 15:04
explain to me is how you just considered the 15:04
differences between the prior art and the claim 15:04
with respect to Symons? 15:04
A. The differences between the prior 15:04
art and Symons. 15:04
Q. The prior art is Symons, and the 15:04
claim -- 15:04
A. Right. 15:04

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Q. -- which is claim 1 of the '317 patent. 15:04 15:04

A. And now what are you asking? 15:04

Q. I'm asking what you've identified as the differences which you think a POSITA would understand would be obvious to overcome. 15:04 15:04 15:04

MS. NGUYEN: Objection, form. 15:04

A. I mean, I have a whole declaration with going over every item of claim 1. So you're asking me to -- 15:04 15:04 15:05

Q. To identify what in claim 1 -- and you are welcome to look. We are just looking at the elements of claim 1. 15:05 15:05 15:05

To the extent that you say Symons does it, then there is no difference. To the extent you say that there is something different, then you should identify what the difference is and what it is that you are proposing to do to Symons to overcome that difference. 15:05 15:05 15:05 15:05 15:05 15:05 15:05 15:05

A. So as I say in paragraph 70, the preamble of claim 1 is obvious due to Symons. Symons discloses this preamble, as I say in paragraph 70. 15:06 15:06 15:06 15:06

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Q. I don't want to stop you, but you 15:06
don't say, "obvious." You say Symons discloses 15:06
the preamble, which would suggest that you are 15:06
saying Symons by itself meets the preamble and 15:06
you don't need Williams for it. 15:06
That's the type of analysis that I 15:06
am looking for. 15:06
A. I understand. Okay. Yes. 15:06
Q. Okay. Do you agree with how I 15:06
characterized that? 15:06
A. I understand. 15:06
So you're -- 15:06
MS. NGUYEN: Objection, form. 15:06
A. You are asking what Symons 15:06
discloses? 15:06
Q. I'm asking what Symons doesn't 15:06
disclose. 15:06
A. Doesn't. 15:06
Q. Right. So with the preamble, since 15:06
Symons discloses it, you can say that Symons 15:06
discloses the preamble, nothing needs to be 15:06
changed, next element. 15:06
A. That's what I -- 15:06
Q. That's what I am looking for. 15:06

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A. That's what I was trying to say, it discloses it. So -- and I was moving on to the next one. I was looking for the one that it doesn't disclose, right? 15:06

I thought that was the question. 15:07

Q. That's the question. 15:07

A. Then I'm doing that, yes. 15:07

Q. Okay. Thank you. 15:07

A. And I went through -- I'm going one by one, and I said that preamble discloses. 15:07

Q. Right. 15:07

A. Okay. 15:07

So Symons discloses element 1[a], receives instructions from a user using natural language interface. 15:07 15:08 15:08

Q. And you're relying upon the chat bot collects all the information picture where the user instruction is, I want a new signature? 15:08 15:08 15:08

A. Yes. 15:08

Q. Okay. 15:08

A. So in terms of determining aspect of 1[b], I believe that it is determining because of what I've discussed here. 15:09 15:10 15:10

But if -- and that's why I said I 15:10

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use other means just in case there is a disagreement. 15:10 15:10

And I'm saying in paragraph 78 that if for some reason Symons does not determine -- which I think it does -- to implement an automation process, it would have been obvious to a POSITA at the time of the priority date. 15:10 15:10 15:10 15:10 15:10

Also, Williams here -- we are using Williams -- discloses a system that uses both chatbots and RPA bots. Chatbots are used to interface with a human where it is common for humans to have more than one intent. Chatbots or digital assistants -- this is a quote from -- 15:10 15:10 15:10 15:10 15:10 15:10 15:10

Q. Again, I -- I don't mean to interrupt you -- 15:11 15:11

A. I'm not going to read it. I just wanted to say that part of the -- 15:11 15:11

Q. Right. My point is, what about Symons do you have to modify for Williams, not what Williams teaches. 15:11 15:11 15:11

In other words, to the extent Symons doesn't teach determining how, do you change Symons so that way, in view of Williams, you now have determination? 15:11 15:11 15:11 15:11

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A. Well -- 15:11
Q. That's what -- that is the type of 15:11
answer I'm looking for. 15:11
MS. NGUYEN: Objection, form. 15:11
A. So Williams talks about a bunch of 15:11
different things that it does with automation 15:11
and determining which one to do. That's the 15:11
point that you can utilize from the Williams in 15:11
order to -- I'm sorry, in order to make sure 15:11
that the determining limitation is understood 15:11
and is there. 15:11
Q. And the issue is that in Symons, it 15:11
just does one thing, and so if that isn't good 15:12
enough for the determination, then you're 15:12
relying on Williams to teach that you can choose 15:12
among multiple things. 15:12
Is that a correct summary of what 15:12
your position is? 15:12
MS. NGUYEN: Objection, form. 15:12
A. I believe the one thing, because of 15:12
the way it's phrased, is also, and, also, 15:12
because determining is deciding. 15:12
So because "determining" means 15:12
deciding, regardless, even if it's one thing, 15:12

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it's still deciding, still determining. 15:12
But -- so that is not the only 15:12
reason, it's just that the fact of determining, 15:12
you're determining the -- to use the RPA. And 15:12
it is -- it does have that in it. 15:12
So even by itself, the determining 15:12
act, even if it's a single RPA that it 15:12
supports -- which I'm not saying it does, right? 15:12
It can support more because it says 15:12
in its preamble where it says, at this point 15:12
like -- and we don't need to go into that right 15:13
now. 15:13
But -- but -- 15:13
Q. So -- 15:13
A. Let me finish, please. 15:13
Q. Sure. 15:13
A. But the "determining" means 15:13
deciding. So, basically, it -- Symons is also 15:13
determining the RPA to use. 15:13
Q. And if you look at 79, the first 15:13
sentence, you say (as read): A POSITA would 15:13
have been motivated to have a chatbot that 15:13
discerns the user's intent (nature of the call) 15:13
so that the RPA can handle multiple requests. 15:13

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Do you see that? 15:13

A. Yes. 15:13

Q. So the modification that you are 15:13
proposing in the alternative is based upon 15:13
Williams' teaching that you would modify Symons 15:13
so it's clear that the chatbot discerns the 15:13
user's intent, the nature of the call, so the 15:13
RPA can handle multiple requests, is that 15:13
correct? 15:13

A. In case -- 15:13

Q. In case your view on the front -- 15:13

A. -- the objective party is not 15:13
accepting the fact that Symons is indeed 15:14
determining and that, also, in addition to 15:14
determining -- so determining has two sides, is 15:14
the deciding. But in addition, that it can 15:14
handle more than one, then Williams also can be 15:14
used to clarify that. 15:14

Q. And that was a backup position you 15:14
had before you ever saw Mr. Zatkovich's 15:14
declaration, right? 15:14

A. Williams was a backup position, yes. 15:14

MS. NGUYEN: Objection, form. 15:14

Q. And whose idea was it to include a 15:14

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backup position for this element at the time you 15:14
prepared your original declaration? 15:14
MS. NGUYEN: Objection, form. 15:14
A. I think that Williams was actually 15:14
one of the things that -- one of the references 15:14
that I found. 15:14
So I can't go back to -- it's over a 15:14
year ago -- to tell you exactly, but definitely, 15:14
I am -- you know, this is -- I feel strongly 15:14
about using it. 15:15
Q. And did you feel that you needed the 15:15
backup position because it wasn't crystal clear 15:15
that Symons actually makes the determination? 15:15
A. To me, it is clear. But I 15:15
understand that you need to be -- in this 15:15
evaluation, you need to make sure that the other 15:15
party who is actually listening, you know, 15:15
receiving this information also agrees with you. 15:15
So in flexibility, I think it makes 15:15
sense to have Williams as the supporting 15:15
document -- 15:15
Q. So to -- 15:15
A. -- to combine. 15:15
Q. Is it fair to say that your position 15:15

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number 1 is that Symons as is teaches the 15:15
determining step of 1[b] but your backup 15:15
position was that it would have been obvious to 15:15
modify Symons so that the chatbot can discern 15:15
the user's intent, the nature of the call, so 15:16
the RPA bot can handle multiple requests. 15:16
Is that a fair summary of what you 15:16
are saying would be the difference that would be 15:16
obvious? 15:16
MS. NGUYEN: Objection, form. 15:16
A. Yes, I think that would be, yes. 15:16
Q. And in paragraph 79 is where you say 15:16
that? For the alternative position? 15:16
A. Well, it continues, 79 is where it 15:16
starts. 15:16
Q. 79 is where you say what the 15:16
position is and then the paragraphs that follow 15:16
support that position? 15:16
A. Yes. 15:16
Q. Okay. And do you identify what 15:16
modifications you would do to Symons in view of 15:17
your assertion in paragraph 79 as to handling 15:17
multiple requests? 15:17
A. Well, again, together with the rest, 15:17

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but in 79, I'm setting the stage with how 15:17
Williams talks about the importance RPAs and 15:17
having multiple things being done by the RPAs 15:17
and its importance to the organization. 15:17
And then I am talking about the fact 15:18
that given that you want to handle multiple 15:18
things in the organization using the different 15:18
RPAs, then I give examples of, for example, the 15:18
examples that Williams give as some types of 15:18
automation processes that it looks at. 15:18
Q. So have you identified what 15:18
modifications you're proposing it would be 15:18
obvious for a POSITA to do to Symons in view of 15:18
the assertion of paragraph 79 that would be 15:18
obvious to modify Symons to handle multiple 15:18
requests? 15:18
MS. NGUYEN: Objection, form. 15:18
A. In its original form, Symons 15:18
anticipates being able to do more than one RPA 15:18
the way it asks the question. 15:19
So in that manner, like I said, I 15:19
believe that it already knows that that would be 15:19
something of interest and that's what you would 15:19
want to do and that is actually anticipating 15:19

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that they will do other RPAs. And -- 15:19

Q. So before you continue, just to 15:19
complete that thought, your view is because 15:19
Symons says that it can't do more than one 15:19
thing, it anticipates doing many things? That's 15:19
what you are saying? 15:19

MS. NGUYEN: Objection, form. 15:19

Please let him finish answering the 15:19
question. 15:19

A. I'm focusing on "at this moment" 15:19
part of that. 15:19

Q. Right. 15:19

A. So what you said was missing that at 15:19
this moment. At this moment, to the English 15:19
speaker, would mean that if at this moment I can 15:19
do this, I'm anticipating I will do other things 15:19
later. Because otherwise, there is no point in 15:19
saying "at this moment," I can only do. 15:20

Q. That's the language you are relying 15:20
on? 15:20

A. That's the language I'm relying on. 15:20

Q. I'm sorry, please continue. 15:20

A. So based on that language, I believe 15:20
that Symons already anticipates and knows that 15:20

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it is a good thing to have multiple automation 15:20
processes and then what I'm relying on Symons -- 15:20
I'm sorry, Williams on is that it specifically 15:20
does declare other types of motivations, 15:20
processes and does talk about how it is 15:20
important to be able to do these different types 15:20
of processes for the business of interest which 15:20
is, you know, for them to be successful and for 15:20
the fact that you need to be able to handle 15:20
multiple automation processes for a business. 15:20
Q. And did Arinti or RoboRana ever 15:20
implement an automation process to generate 15:21
electronic letterhead? 15:21
MS. NGUYEN: Objection, form. 15:21
A. Electronic letterhead? With that 15:21
phrase? 15:21
Q. You identify in paragraph 81 -- 15:21
that's the example of one of the other 15:21
processes -- that it would be obvious base upon 15:21
the combination? 15:21
A. That's an example. 15:21
Q. Right. 15:21
A. You are saying did they? 15:21
Q. Yeah. 15:21

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A. So about specifically -- 15:21

Q. Did Symons and Baetens ever modify the chatbot or the Cronos system to generate an electronic letterhead? Because you're saying it would be obvious to a person of ordinary skill in the art to do that and they said at this time. 15:21

So I want to know, did they at some point later modify the system to do what you're saying it would be obvious to do? 15:22

A. I am unaware if they did that or not. 15:22

Q. Did you they modify the system for an automatic generation of an electronic invoice? 15:22

MS. NGUYEN: Objection, form. 15:22

A. I'm unaware of if they have done it. 15:22

Q. Or automated generation of an electronic flyer? 15:22

A. I'm -- let me just cut it short. I'm only aware of this thing that they did but with the anticipation that they will do more and I am unaware of whether they did another one. 15:22

Q. So when they said at this time, that 15:22

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seems to be the only thing that they ever did 15:22
that you are aware of, is that correct? 15:22
MS. NGUYEN: Objection. Form. 15:22
A. That I am aware of. That doesn't 15:22
mean that that may be it because I did not -- 15:22
this is what I was relying on and I'm not sure 15:22
where they went afterwards and whether they 15:22
created another automation. 15:22
Q. But right now, the record is 15:23
everything that you have seen, and based upon 15:23
everything that you have seen that has been 15:23
submitted to the patent office, are you aware of 15:23
any evidence that Symons and Baetens eventually 15:23
modified the chatbot or the RPA to do anything 15:23
other than generate an electronic email address? 15:23
MS. NGUYEN: Objection, form. 15:23
A. Outside of the anticipation that 15:23
they conveyed, I do not know of it. 15:23
Q. And you were going -- is there 15:23
anything else that you are saying was a gap that 15:23
you were trying to fill Williams with with 15:23
respect to element 1[b]? 15:23
I think there is a paragraph 83 that 15:23
suggests that you needed Williams to implement 15:23

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the process on web-based target system? 15:23

MS. NGUYEN: Objection, form. 15:24

A. This is what we discussed in detail 15:24
before the break and I'm still saying the same 15:24
thing which I'm saying that Symons knew how to 15:24
do it and disclosed that you can perform 15:24
something on a web-based target system and 15:24
Williams began, did the complementary thing 15:24
where it supplements that by talking about it. 15:24

Q. And what in Symons is the web-based 15:24
target system that it was disclosing could do 15:24
it? Is it the browser? Or is it the email 15:24
generator that was accessed through the browser? 15:24

MS. NGUYEN: Objection, form. 15:24

Q. Or something else? 15:24

MS. NGUYEN: Same objection. 15:24

A. It was the capability of triggering 15:24
a browser to interface with it, to interface 15:25
with the browser filling in, for example, the 15:25
form, filling in the elements of the automation 15:25
process for example. 15:25

Q. And from what you saw in the Symons 15:25
article and video, is it clear to you whether 15:25
the Cronos email generator software that was 15:25

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accessed through the browser was through the 15:25
internet or whether it resided locally or it 15:25
could have been either? 15:25
MS. NGUYEN: Objection, form. 15:25
A. I believe it could have been either. 15:25
It could have been local and it could have been 15:26
remote. 15:26
Q. You don't know which one it really 15:26
was? 15:26
MS. NGUYEN: Objection, form. 15:26
A. I don't think it matters because 15:26
both are possible. Both -- they -- both are 15:26
possible. 15:26
MS. NGUYEN: Counsel, if we are 15:26
talking about Symons, can you please 15:26
provide the Symons exhibit. 15:26
MR. MACEDO: He has Symons -- I'm 15:26
happy to give ... 15:26
Q. We are going to give you Exhibits 13 15:26
and 14 as previously marked. 15:26
So just to make sure that I 15:26
understand you correctly. You were saying that, 15:26
while it doesn't matter to you, you recognize 15:27
that the Symons disclosure doesn't tell you 15:27

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whether it's residing locally or through the 15:27
internet, it could be either. Is that a fair 15:27
summary? 15:27
MS. NGUYEN: Objection. 15:27
Q. This is Beigi Exhibit 13 as 15:27
originally marked. 15:27
MR. MACEDO: I'll rephrase that 15:27
question, Counsel. 15:27
MS. NGUYEN: Thank you. 15:27
Q. This is the original Exhibit 14. 15:27
So when I asked you from what you 15:28
saw in the Symons article and the video is it 15:28
clear to you whether the Cronos email generator 15:28
software that was accessed through the browser 15:28
was through the internet or whether it resided 15:28
locally or it could have been either, you said 15:28
I -- I think you meant I believe it could have 15:28
been either, it could have been local and it 15:28
could have been remote. 15:28
A. Because it is a web browser and a 15:28
web browser can run things locally and can run 15:28
thing remotely. Because it is a web-based 15:28
target system, it can run a local program and 15:28
can run external programs, remote programs. 15:29

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But the web browser is the -- the 15:29
web interface is what's important. 15:29
Q. So putting aside what's important 15:29
and what's not important, what I want to know is 15:29
your position is that it is not clear whether 15:29
the web browser is acting -- is accessing the 15:29
email generator software through the internet or 15:29
by accessing it locally. It could have been 15:29
either based upon the disclosure that you see, 15:29
is that correct? 15:29
MS. NGUYEN: Objection, form. 15:29
A. Based on what we have from Symons, 15:30
it is filling information on a web-based 15:30
browser, filling the information that it has 15:30
collected. And because it is a web-based 15:30
interface, that could -- the location of where 15:30
it's running is, of course, the browser itself 15:30
is running locally, but the location where the 15:30
automation, the back-end automation possibly or 15:30
the front end automation, all of that happens 15:30
is, like I said, unclear. 15:31
But the browser itself is a browser. 15:31
That's running locally. So the web-based 15:31
interface is local. But the target that it is 15:31

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targeting could be a remote target. 15:31
Is that clear enough? 15:31
Q. I believe you're basically saying 15:31
that it is unclear whether the email generator 15:31
software is running locally or remotely, but the 15:31
browser was on the computer? 15:31
A. That's what I am saying. 15:31
Q. Okay. So is there anything else in 15:31
1[b] which you are looking for as a gap in 15:31
Symons either directly or in the alternative? 15:31
I think you finished 1[b] but I 15:31
don't want to stop you? 15:31
A. I think we did. 15:31
Q. What about in 1[c]? 15:31
A. Symons definitely collects the 15:32
information to be used as part of the automation 15:32
process. It discloses that. 15:32
Q. Okay. 1[d]? 15:32
A. There is a typo here, "must" should 15:33
be "much" on 87 that I just saw actually. 15:33
Q. You want to read the sentence and 15:33
say it correctly? 15:33
A. Correctly it would be, "As Symons 15:33
explains, robotic process automation allows 15:33

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organizations to execute manual processes much 15:33
faster, more accurate and reliable." Rather 15:33
than "must" faster. 15:33
Q. Okay. You have the original exhibit 15:33
there. If you want to mark it and correct it in 15:33
pen so we have your -- with your initials. 15:33
And if you can put your initials to 15:34
show it was you and today's date. 15:34
Q. Thank you. 15:34
So are you saying that element [d] 15:34
is done solely by Symons or do you need to fill 15:34
a gap either in the alternative or expressly? 15:34
MS. NGUYEN: Objection, form. 15:34
A. Let me read it. I sort of got 15:34
caught up by that typo. 15:34
Q. Sure, please, take your time. 15:34
A. So again, depending on whether you 15:36
agree with my assessment that the fact that it 15:36
can open up a browser and can implement that 15:36
process through a web-based interface or not, 15:36
Symons by itself provides the elements of -- at 15:36
least the first part of -- let me continue, 15:36
sorry... 15:36
And using Williams, you know, one of 15:37

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the things that we can use as a supplement is 15:37
the fact that Williams also talks about using -- 15:37
being able to perform with respect to third 15:37
para -- third-party -- to have web-based target 15:37
system without relying on API. So that also 15:37
comes in from Williams, also -- 15:37
Q. Okay, I'm still on -- you're jumping 15:37
past [d], right? 15:37
A. We did [d] already. 15:37
Q. I'm sorry, I had questions for you 15:37
for [d]. I want to ask you questions on each 15:37
element. 15:38
A. Sure. 15:38
Q. Going back to [d], you say in 15:38
paragraph 87, "For generating an email 15:38
signature, a graphical user interface, GUI, is 15:38
displayed to the user. The user interacts with 15:38
the GUI." 15:38
Well, The user doesn't actually 15:38
interact with the GUI; the RPA does, right? 15:38
A. No, that's not true. The user also 15:38
does. 15:38
Q. So to generate an email signature, 15:38
which GUI are you referring to? It looks like 15:38

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the pictures that you are showing are pictures 15:38
of the Cronos system, not the chatbot. 15:38
MS. NGUYEN: Objection, form. 15:38
A. There is the whole GUI which 15:38
includes, for example, the example you gave 15:38
before which was the Microsoft Office in copying 15:38
the information, right? 15:38
Q. That's a different piece of software 15:38
with a different GUI, right? 15:39
A. No, the GUI is the same GUI. 15:39
It's -- your graphical user interface is your 15:39
graphical user interface. This is what -- if 15:39
you rely on a graphical user interface, it's the 15:39
collection. It is what is accessible to you and 15:39
what you can use your mouse and keyboard or 15:39
whatever other means you have. That is your 15:39
GUI. 15:39
Q. Just so I understand, when we are 15:39
talking about the graphical user interface of 15:39
the web-based target system, you're talking 15:39
about everything that's on Mr. Symons' screen? 15:39
Because Mr. Symons' screen has a 15:39
picture of a rock climber, it has a browser 15:39
using the Cronos software, it has a Windows 15:39

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dialogue box, it has the Word document and it has an email has been sent. Are you saying all of that is the GUI? 15:39

MS. NGUYEN: Objection. Form. 15:39

A. I'm referring to -- I'm referring to the figure above paragraph 90. Is that what you are looking at? 15:40

And this whole thing is a GUI. Because what you are doing is you're copying from the -- in this GUI, you're copying from the results of the RPA into your document. This whole thing is your GUI, that has -- that Symons has access to, has triggered, basically. 15:40

Q. And would the Word document that the email signature gets paste into also be part of what you're identifying as the GUI? 15:40

MS. NGUYEN: Objection. 15:40

Q. Under your read? 15:40

MS. NGUYEN: Objection to form. 15:40

A. Under my read, because this is a interface right now, this is an interface where it's copying -- it's requesting to copy this information on to the Microsoft Office document. 15:40

So as far as that goes, that's 15:41

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definitely part of the GUI. Because this is 15:41
what he is relying on in order to be able to 15:41
pass on the information. Of course this will be 15:41
emailed to the person as well, but this is one 15:41
thing that is triggering as well. 15:41
So -- I'm sorry, can I continue? 15:41
And the rest of whether you go into 15:41
Microsoft Office and that would be considered a 15:41
GUI at that point, you have to see whether 15:41
Symons has any specific interactions with the 15:41
Microsoft Office which relates to what they're 15:41
doing in the process. 15:41
I'm not really considering that 15:41
because we don't go that far. We are just 15:41
talking about up to this moment. But there is 15:41
definitely interaction of the user with the -- 15:41
with the system, with the GUI. 15:41
Q. So is it your understanding that 15:41
Mr. Symons clicked the button that said yes, you 15:41
can copy? Or is it your understanding that the 15:42
RPA automatically clicked that button? 15:42
MS. NGUYEN: Objection, form. 15:42
A. I believe that Symons leaves this to 15:42
what possibility to be open. So you should be 15:42

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able to do that, and because the RPA basically 15:42
is an RPA, the RPA should be able to do that as 15:42
well. 15:42
But you know, if the user does it, 15:42
which seems like in the example that they're 15:42
showing the user is doing it, then that's an 15:42
interaction with the GUI. 15:42
Q. I'm not trying to put words in your 15:42
mouth. I just want to make sure I understand 15:42
what you are saying. 15:42
You're saying that it is possible 15:42
that the RPA clicks a button and it is also 15:42
possible that Mr. Symons clicked the button. 15:42
You just don't know which one happened. Putting 15:42
aside whether it's material or not, that's what 15:43
you're saying was the actual scenario, am I 15:43
right? 15:43
MS. NGUYEN: Objection, form. 15:43
A. What I'm saying is that based on the 15:43
fact that we see the action happening, the 15:43
action of the mouse moving and clicking, it 15:43
could be formed either way. 15:43
It could be formed by the RPA or it 15:43
could be formed by the user and I believe that I 15:43

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think most likely by the user because it is an 15:43
interface to send information off to another -- 15:43
another software let's say. 15:43
So -- yeah. 15:43
Q. And the box which is the Windows 15:43
modal box that the red arrow is pointing to, is 15:43
that generated by the Cronos software or is it 15:43
generated by the local operating system on the 15:44
computer that is running the RPA? 15:44
A. I believe that was by the operating 15:44
system. 15:44
Q. So it's a different software program 15:44
that's generating that box than the Cronos 15:44
software? 15:44
MS. NGUYEN: Objection, form. 15:44
A. In that regard, the operating system 15:44
is generating everything. The operating system 15:44
is the operating system. Everything is you see 15:44
is by the operating system. Nothing else. 15:44
Q. So the Cronos email generator is 15:44
being generated by the operating system is your 15:44
testimony? 15:44
A. The Cronos -- 15:44
Q. Cronos email generator, that's the 15:44

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software that the user is running, right? 15:44

A. It's being displayed by the 15:44

operating system, it's being presented by the 15:44

operating system. The operating system has a 15:44

role in every single thing you do with the 15:44

computer. 15:44

You're asking -- what you are asking 15:44

me is whether another software generated this 15:44

and I said -- and if it's the operating system, 15:45

everything we see here and anywhere else you see 15:45

on any computer is generated by the operating 15:45

system. 15:45

Q. Is the operating system the 15:45

web-based target system in your read? 15:45

MS. NGUYEN: Objection, form. 15:45

A. The operating system can run either 15:45

locally, where your web-based target system is 15:45

on or it can be virtually on some other system. 15:45

So what you see is definitely your 15:45

GUI. What is available to you to interact with 15:45

is a GUI. That is the graphical user interface 15:45

because the commonality in it is that user 15:45

interface and the graphics. 15:45

Q. But the claim says -- if you look at 15:45

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your quote from 1[d], "implementing the 15:46
automation process by interacting with the 15:46
graphical user interface, GUI, of the web-based 15:46
target system." 15:46
So if the GUI is being generated by 15:46
the operating system instead of by the Cronos 15:46
email generator, I'm trying to understand if 15:46
you're asserting that it's the operating system, 15:46
the Cronos email generator or something else 15:46
that is the web-based target system? 15:46
A. What I am saying is that based on 15:46
the request of any entity including the 15:46
web-based target system which is running on a 15:46
browser, an operating system can display 15:46
something. 15:46
So if you go to your browser and in 15:46
your browser, there is something that runs that 15:46
requires something to be copied outside to the 15:46
outside world in the browser, the operating 15:46
system is used as an interface, as an 15:47
intermediary to trigger a mechanism like such as 15:47
a clipboard, which as you see here. 15:47
The clipboard is across all 15:47
software. It's by the operating system that 15:47

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connects all softwares to each other. So I 15:47
believe this is a clipboard, if I am not 15:47
mistaken, and basically it is copying it to the 15:47
clipboard to be then used by some other 15:47
software. 15:47
Q. And can you identify whether you are 15:47
asserting any software running on Symons 15:47
computer is the web-based target system? 15:47
A. The web browser. 15:47
Q. The web browser? 15:47
MS. NGUYEN: Objection, form. 15:47
A. The web browser is the -- is the 15:47
web-based target system. 15:47
Q. And you're not asserting that the 15:47
Cronos email generator is the web-based target 15:47
system? 15:48
MS. NGUYEN: Objection, form. 15:48
A. The Cronos email generator has two 15:48
parts, two main parts. There is an actual 15:48
action that it does. Of course yet another part 15:48
is the communication with the chatbot that we 15:48
talked about, right, the association between the 15:48
two. And then there is the actual action 15:48
that it does. 15:48

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But then there is the interface with the user which is through the browser in this case. And that is -- so that's why it can't just tell you one thing because it has three important parts. So I can't tell you that it's this or that. But it has different parts. 15:48

Q. So you're not able to answer yes or no as to whether the Cronos email generator is the web-based target system under your read, is that correct? 15:48

MS. NGUYEN: Objection, form. 15:49

A. The Cronos email generator has several parts to it, like I said. Because it is running in a browser as an interface. Then that is one possible web-based target system because you are interacting, it's interacting with you through a web-based interface. 15:49

Any more clarity on that? 15:49

Q. No. I don't understand what you're saying, but if that's going to be the same thing that you're going to keep saying, I will move on. 15:49

A. Okay. 15:49

Q. The next element is 1[e]. And in 15:49

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1[e], in paragraphs 91 and 92, you do not 15:50
identify any disclosure from Symons and instead 15:50
in 92 say Symons and Williams renders obvious. 15:50
So I want to know, are you saying 15:50
that Symons -- same question we have been 15:50
discussing for a while. Are you saying that 15:50
Symons discloses 1[e] or are you saying that you 15:50
need to fill the gap with Williams? 15:50
MS. NGUYEN: Objection, form. 15:50
A. So we have been talking about 15:50
specifically the same thing, quite a bit. It's 15:50
not new, and we have been talking about this 15:50
quite a bit. 15:50
And like I said, the web-based 15:50
target system may be a third-party web-based 15:50
target as Symons discloses, but Williams 15:50
discloses in more clarity these different 15:51
examples and completes Symons. 15:51
Q. And the paragraphs you rely on from 15:51
Williams is quoting paragraph 91? 15:51
A. That's one of the places that 15:51
Williams talks about. 15:51
Q. And where does the paragraph in 91 15:51
identify the web-based target system as being a 15:51

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third-party web-based target system? 15:51

MS. NGUYEN: Objection, form. 15:51

A. For example, the Citrix terminal 15:51

session, Citrix is a method for you to run 15:51

remotely and, therefore, a third-party target 15:51

system. And web browser. I'm sorry and web 15:51

browser basically. But that's one of the 15:51

example. 15:52

Q. So your understanding is that the 15:52

'317 patent would be met by using a Citrix 15:52

terminal to access a remote station and that 15:52

would be the Citrix terminal is the third-party 15:52

web-based target system for the purposes of the 15:52

'317 patent? 15:52

MS. NGUYEN: Objection, form. 15:52

A. The Citrix terminal session would be 15:52

an example of a third-party system that can be 15:52

run based on what Williams provides, right. So 15:52

that's an example of third-party. 15:52

There are other examples that 15:52

Williams gives. But here, in this example, the 15:52

Citrix terminal session is actually opening 15:52

really an interface with something that's 15:53

running somewhere else. And that indeed makes 15:53

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it a third-party system. 15:53

Q. So assume for a second that the 15:53
Arinti chatbot and the RoboRana RPA and all the 15:53
software that is being run in the Cronos email 15:53
generator are not considered third-parties for 15:53
the purposes of this IPR. 15:53

If instead of emailing the data from 15:53
Mr. Vin Bie's computer to Mr. Symons' computer, 15:53
they opened a Citrix window, are you saying that 15:53
would make it the RoboRana email generator 15:53
software into a third-party target system? 15:53

MS. NGUYEN: Objection, form. 15:54

A. Open and run some automation there. 15:54
Not just opening it. Because we are talking 15:54
about in context -- 15:54

Q. Yeah, run the exact same software? 15:54

A. In context. 15:54

Q. Right. 15:54

A. You open the Citrix terminal and run 15:54
the automation there. That's like a web browser 15:54
which is web-based target system running 15:54
something remotely. That's another example. 15:54

These are all examples of where you 15:54
can run something that would be remote. 15:54

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Q. But it isn't merely that it's 15:54
remote. It says a third-party web-based target 15:54
system, right? It's not enough that you are 15:54
running a server which isn't a target system. 15:54
It has to be a target system. Right? 15:54
A. A target system is a system that is 15:54
in a target. 15:54
MS. NGUYEN: Objection to form. 15:54
Q. And the target system in the context 15:54
of the '317 patent claim is the target which the 15:55
RPA -- which the chatbot gathers information to 15:55
fill in on the target system which is a 15:55
web-based third-party target system remote 15:55
somewhere so that way, it executes functionality 15:55
of that target system, right? 15:55
A. Say that again, I don't think I -- 15:55
MS. NGUYEN: Objection to form. 15:55
A. Say that again, I need the order of 15:55
things. 15:55
Q. There is a chatbot and an RPA. 15:55
A. Yes. 15:55
Q. And the invention involves gathering 15:55
information from the chatbot, right? 15:55
A. Yes. 15:55

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Q. And then using that information 15:55
through a displayed user interface or GUI of a 15:55
computer program or third-party target system -- 15:55
A. Or a web browser. 15:55
Q. It doesn't say web browser. You say 15:55
web browser. The claims say computer program or 15:55
a third-party web system -- 15:55
A. A target system. Any target system. 15:55
Doesn't it say target system? You just said 15:55
computer program, but it's a target system. 15:56
Q. Computer program in the first two 15:56
patents, target system in the third. 15:56
A. We are talking about this now. 15:56
Target system is a target system. Any system 15:56
that you target. 15:56
Q. Okay. But you are supposed to be 15:56
executing functionality of the target system as 15:56
a result of filling in the data, correct, that 15:56
you have created from the chatbot. Is that 15:56
consistent with your understanding of the 15:56
invention? 15:56
MS. NGUYEN: Objection, form. 15:56
Q. For the '317 patent? 15:56
A. You collect information using a 15:56

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chatbot and then you execute on the target system. 15:56 15:56

Q. A third-party web-based target system? 15:56 15:56

A. A third-party web-based target system. 15:56 15:56

Q. And the whole reason why you are collecting the information is so you can use the information to get the target system's functionality like buying a book or generating an email signature, right? 15:56 15:56 15:56 15:56 15:56 15:56

MS. NGUYEN: Objection, form. 15:56

A. Not the only reason, but that's one of the reasons, yes. 15:56 15:56

Q. And you understand that if you are buying a book on Amazon.com or Widgetco, that would be the target system, right? 15:56 15:57 15:57

A. What would be the target system? 15:57

Q. Amazon.com or Widgetco, if that's where you are buying a book as an example. 15:57 15:57

A. If you are buying a book on Amazon, then the target system may be Amazon or may be an intermediate layer. I can't say specifically that will be a -- 15:57 15:57 15:57 15:57

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Q. In Allen, you called out Widgetco as 15:57
the target system, right? 15:57
A. That's one example. 15:57
Q. And that's in contrast to the 15:57
computer program that you rely on in the other 15:57
patents which you say is the Plow (ph) system, 15:57
right? 15:57
A. Plow system. Yes. 15:57
Q. So is the use of a Citrix terminal 15:57
to do the exact same thing which was being done 15:57
locally without access to any web-browser or any 15:57
remote server enough to make the claim infringe? 15:57
MS. NGUYEN: Objection, form. 15:58
A. To make the claim infringe on... 15:58
Q. On a system that you're accessing 15:58
through Citrix? 15:58
A. I'm not sure if I understand the 15:58
question. If I did, I would answer. I'm just 15:58
not sure if I understand the question. 15:58
Q. Which part do you not understand? 15:58
A. State it and I'll tell you because I 15:58
just don't understand. I don't get it. 15:58
Q. Assume you have a system which did 15:58
not use Citrix, and as such, there was no 15:58

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third-party web-based target system, you are 15:58
doing everything else. But there is no 15:58
third-party -- 15:58
A. You are using Citrix as an example 15:58
of a third-party target system? 15:58
Q. I'm using Citrix as a modification 15:58
to fill the gap. 15:58
A. As an example of a target system. 15:59
Third-party target system. 15:59
Q. Under your read. 15:59
A. Okay, go ahead. 15:59
Q. So -- 15:59
A. So the system does not have that 15:59
third-party target system. 15:59
Q. Right. The system is just doing, 15:59
you know, assume you have Symons and the email 15:59
generator and the email generator used its own 15:59
GUI instead of the browser and did it directly 15:59
on the computer as an application. So there is 15:59
no issue that it is not web-based. Okay? 15:59
If that application was accessed, 15:59
using the Citrix terminal sessions, would the 15:59
Citrix software be a third-party web-based 15:59
target system under your read of the '317 15:59

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patent? 15:59

MS. NGUYEN: Objection, form. 15:59

A. I think you're misunderstanding the 15:59
use of the Citrix in this context. Citrix is 16:00
not used to access the system. I'm not sure -- 16:00
either you are misunderstanding or you are 16:00
trying to look for something else that I'm not 16:00
understanding. Either -- there is a 16:00
miscommunication here. 16:00

You started saying that there is a 16:00
system, all self sufficient, running on its own, 16:00
everything is local on the same device, this is 16:00
your hypothetical example? 16:00

Q. My hypothetical is instead of using 16:00
the web browser and running the software 16:00
locally, that they use their own GUI of the 16:00
third-party generator. They just open up the 16:00
app without using the browser, they just use 16:00
their own interface. 16:00

So there is no issue that you were 16:00
relying upon about whether or not the use of the 16:00
browser makes it a web-based target system. 16:00

A. Where does the Citrix coming now, 16:01
with this scenario? That's where I get lost. 16:01

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Q. Right. Vin Bie accesses now it 16:01
through Citrix on the Symons computer. 16:01
A. I'm not relying on that. I'm 16:01
relying on -- the part that you are saying is 16:01
local moving out to be run on Citrix. 16:01
Q. It will be out from Vin Bie, right? 16:01
MS. NGUYEN: Objection, form. 16:01
Q. Vin Bie is not seeing this computer, 16:01
right? 16:01
A. But what you're saying, by using 16:01
Citrix, what you are saying is that it's just 16:01
running this application on a terminal remotely 16:01
whereas that's not what I'm relying on. 16:01
What I am relying on is using 16:01
something like the web browser or the Citrix 16:01
terminal which are remote access capabilities to 16:01
be able to do -- to basically perform the 16:01
operation. 16:02
So you have -- you still have to 16:02
have your chatbot. You still have to, you know, 16:02
get your information and then you execute the 16:02
stuff on that target system or vice versa also, 16:02
these two conditions. 16:02
Q. So if Symons was disclosing the 16:02

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application running legally through the browser, 16:02
so it wasn't a third-party web-based target 16:02
system under the board's ultimate 16:02
construction -- 16:02
A. On the browser? That bothers me. 16:02
Because on the browser -- 16:02
Q. I'm assuming they don't accept your 16:02
browser argument for the purposes of this 16:02
question. 16:02
A. But the browser is a separate 16:02
software. The browser is a browser and that 16:02
browser is part of the GUI that you are using, 16:02
but you cannot say that -- if they -- they have 16:02
to basically implement all the capabilities of a 16:03
browser within their software. Is that what you 16:03
are asking? 16:03
Q. Or that they use Citrix instead of 16:03
the browser to access the application? 16:03
MS. NGUYEN: Objection, form. 16:03
A. I don't -- I'm sorry, I really don't 16:03
get it. That's -- 16:03
Q. That's fine, we can move on. Do 16:03
1[f]. 16:03
MS. NGUYEN: Can we take a break, 16:03

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Counsel. 16:03

Q. I think -- I don't want to wear you 16:03
out, but I don't think there is going to be much 16:03
with 1[f] and 1[g] and 1[h] but it's up to you, 16:03
Dr. Beigi, if you can handle just -- 16:03

A. If you don't mind, just a quick one. 16:03

Q. Can we limit it to five minutes? 16:03

A. Yes. 16:03

(Recess) 16:19

Q. So with respect to element AF of the 16:19
claim 1 of the '317 patent in Beigi Exhibit 7, 16:20
you start off with, "As Symons confirms in his 16:20
declaration..." 16:20

Do you see that? 16:20

A. Yes. 16:20

Q. Did you need Mr. Symons to confirm 16:20
in his declaration in order to show this element 16:20
was present? 16:20

A. Well, the user does not use an API. 16:20
So -- but the thing is that Symons clarifies 16:20
that between the automation process and the 16:20
chatbot system, there isn't a specific API. So 16:20
without relying on an application exposed by the 16:21
web-based target system to the chatbot part. 16:21

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Q. But the only thing that you cite is 16:21
Symons' declaration as support for Symons 16:21
disclosing this, right? Because otherwise, you 16:21
move on to "if for some reason..." 16:21
A. Yes. 16:21
Q. And then [g], you say in paragraph 16:21
98, "Symons discloses...," and then in 99, you 16:21
say, "As discussed for element 1[b], the GUI is 16:21
a web-based target system." Right? 16:21
A. Yes. 16:22
Q. And that's when you say that it 16:22
would be obvious to combine Symons and Williams 16:22
with respect to element 1[g], right? 16:22
A. That's where I say it, yes, in 16:22
paragraph 99. 16:22
Q. Right, and except for 16:22
cross-referencing element 1[b], you identify no 16:22
disclosure from Williams in addition to whatever 16:22
you said with respect to 1[b], right? 16:22
A. Well, I'm making reference to the 16:22
image as well. Which is part of -- sorry? 16:22
Q. That's part of Symons, not Williams? 16:22
A. Symons. No. Symons. 16:22
Q. Right. 16:22

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A. I thought you were asking what part 16:22
of Symons I was referring to? 16:22
Q. No, I said except for 16:22
cross-referencing element 1[b], you identify no 16:23
disclosure from Williams in addition to whatever 16:23
you said with respect to 1[b], with respect to 16:23
this element, correct? 16:23
A. So yeah, Williams comes into the 16:23
picture in the paragraph 99 if that's what you 16:23
are asking. 16:23
Q. Right. Based upon whatever you said 16:23
in element 1[b]? 16:23
A. Yeah. 16:23
Q. And then for 1[h], 100, you say, 16:23
"Symons discloses," and then you rely upon the 16:23
copying in 101, right? 16:23
A. The GUI element, yes. 16:23
Q. But you then again cross-reference 16:23
element 1[b] for the GUI is of a web-based 16:23
target system and the combination of Symons and 16:23
Williams? 16:23
A. Yes. 16:23
Q. Thank you. 16:23
So now I'm going to show you the 16:23

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three institution decisions that went forward 16:23
that we marked previously. 16:23
A. Yes. 16:23
Q. So we marked as Beigi Exhibit 15 the 16:23
paper number 12, dated March 20, 2024, which is 16:24
the granting of institutional of the 16:24
interparties review for IPR 2023-01368, Patent 16:24
Number 10,819,664. 16:24
And then we are going to also give 16:24
you as Beigi Exhibit 17 which was previously 16:24
marked paper number 10, entered March 20, 2024, 16:24
for IPR 2023-01379 relating to Patent Number 16:24
11,258,732. 16:24
And then we will show you what we 16:24
previously marked as Beigi Exhibit 18 which is 16:24
the decision granting interparty review for IPR 16:24
2024-00065 with respect to U.S. Patent Number 16:25
11,558,317. 16:25
Okay? 16:25
A. Yeah. 16:25
Q. Now, you've read all three of these 16:25
institution decisions that we have marked as 16:25
Beigi 15, 17 and 18? 16:25
A. Previously. I've read it 16:25

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previously, yes. 16:25
Q. Before today. 16:25
A. Yes. At the first, before the first 16:25
deposition. 16:25
Q. Right. 16:25
A. Yes. 16:25
Q. Okay. And when you read them, did 16:25
you see any mistakes or errors in what the board 16:25
said with respect to any part of any of these 16:25
decisions? 16:25
MS. NGUYEN: Objection to form. 16:25
Q. To the best of your knowledge? 16:25
A. I don't remember seeing any errors. 16:25
Q. Did you understand that the board 16:25
properly understood what the patents-in-suit 16:25
meant? 16:26
MS. NGUYEN: Objection, form. 16:26
A. I'm not sure if I understand what 16:26
you mean. What do you mean? 16:26
Q. Well, so, you are looking at Exhibit 16:26
15 for a second. 16:26
A. Yes. 16:26
Q. You see that on page 3, there is a 16:26
description of the of '664 patent, Exhibit 1001. 16:26

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It's the C element, not the B element. 16:26

A. Okay. 16:26

Q. Okay? 16:26

And I'm going to walk through it sentence by sentence with you so you understand. 16:26

A. Okay. 16:26

Q. And if you look at the Beigi Exhibit 17, you will see there is a comparable section that is not quite verbatim, but pretty close in its descriptions and the same thing in Beigi 18, you will see a similar one. 16:26

A. Okay. 16:27

Q. So now that you've done your original declaration, you've seen the institution decision, you've seen Mr. Zatkovich's declaration, you've been deposed by me for two days before today, you were -- you saw Mr. Zatkovich deposed, and you've done your reply declaration. 16:27

What I want to do is understand whether you think the board properly summarized the three patents-in-suit in the institution decision and I'm going to go line by line asking 16:27

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you specific questions. 16:27

A. Okay. 16:27

Q. Okay. So when you start off, and 16:27
what I would suggest is that you have all three 16:27
open next to each other. 16:27

So I'm going to be reading from 16:28
Beigi Exhibit 15 discussing the '664 patent, but 16:28
feel free to follow along on all three of them. 16:28

A. Can we do one at a time? 16:28

Q. They all are virtually identical and 16:28
I'll point out any differences as we go. 16:28

I would like to avoid having to 16:28
spend two hours doing the same thing three 16:28
times. 16:28

A. Sure. 16:28

Q. So looking at the institution 16:28
decision for the '664 patent, Beigi Exhibit 15, 16:28
the first sentence says the '664 patent is 16:29
titled "Chat-based Application Interface For 16:29
Automation," and generally relates to "user 16:29
interfaces for automation processes that utilize 16:29
chatbot," and then cites to portions of the 16:29
patent. Right? 16:29

A. Yes. 16:29

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Q. Do you think that is a proper 16:29
summary of what the '664 patent claims generally 16:29
relate to? 16:29
MS. NGUYEN: Objection, form. 16:29
A. You know, the five words that they 16:29
use, it is a summary -- I think the five words 16:29
that they use to summarize, that is a -- it 16:29
summarizes the patent. But it's a short -- it's 16:30
a really a -- not even a description, right? 16:30
It's a -- I mean, it's -- they only 16:30
go for a few words. Which part do you want me 16:30
to look at? The fact that it's a user -- that 16:30
relates to user interface for automation 16:30
processes that utilize chatbots, right? That's 16:30
basically -- is there that's the -- 16:30
That's basically like a rewording of 16:30
the title -- 16:30
Q. Well, in that -- 16:30
A. -- in that sentence. 16:30
I mean, if you look at it, it's got 16:30
"interface" which is "user interface." You've 16:30
got automation, which is automation. You've got 16:30
utilizing chatbot, which is a chat-based. So 16:30
basically just a restatement of the title. In 16:30

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that capacity. I think since it is a 16:30
restatement of the title, it should be a good -- 16:30
Q. Well, is it a restatement of the 16:31
title or is it a summary of the gist of the 16:31
claim? 16:31
MS. NGUYEN: Objection, form. 16:31
A. It's a very, very short summary. 16:31
That's what I am trying to say. So it could be 16:31
an alternate title. It's a very short summary. 16:31
Does that -- do I make myself clear 16:31
what I mean by that? 16:31
Q. So let me rephrase it. 16:31
Do you think the board misunderstood 16:31
the patent by saying that it generally relates 16:31
to user interfaces for automation processes that 16:31
utilize chatbots with respect to the '664 patent 16:31
of claims? 16:31
A. No. 16:31
Q. Do you notice with respect to the 16:31
'732 patent, it doesn't offer that same summary? 16:31
I'm looking at page 3 of Exhibit 17. 16:31
A. Where is the actual description? 16:31
The first paragraph is just saying it's a 16:31
continuation. Or we did the second paragraph? 16:32

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Q. The second paragraph goes -- matches 16:32
the technical solution which we will continue on 16:32
to. 16:32
A. What part do you want me to look at? 16:32
Q. What I am saying is that you don't 16:32
see that it says that the '732 patent generally 16:32
relates to user interfaces for automation 16:32
processes that utilize chatbots? You don't have 16:32
comparable language? 16:32
A. I see it says, it says -- the 16:32
automation process -- I don't see the actual -- 16:32
I don't see any description here. Or maybe I'm 16:32
missing it. 16:32
Q. No, my point is there is no 16:32
description. 16:32
A. There is no description, just a 16:32
bunch of continuation. 16:32
Q. It's just giving you the family 16:32
history. 16:32
A. Yeah. 16:32
Q. And the same thing with the '317 16:32
patent when you look at it. 16:32
A. Yes, continuation, yeah. 16:33
Q. Okay. So now all three of them go 16:33

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on and you can substitute the Patent Number but 16:33
I'll read the '664 one and it says, "The '664 16:33
patent discloses" -- quote -- I'm sorry, 16:33
discloses a "technical solution ... to use a 16:33
natural language interface" -- 16:33
A. I'm sorry, where are you reading 16:33
this? 16:33
Q. I'm continuing after the cite on the 16:33
same page. The '664. 16:33
A. Oh, okay. I'm sorry. I was looking 16:33
at the next paragraph. 16:33
Q. Yeah. So let's do it again. 16:33
So I'm looking at Exhibit 15, page 3 16:33
and the second sentence under the heading says. 16:33
"The '664 patent discloses a 'technical solution 16:33
... to use a natural language interface to 16:33
receive input from the user and base thereon 16:34
select an automation process to be executed,' 16:34
where 'the automation process may be executed in 16:34
a manner that manipulates the graphical user 16:34
interface, GUI, of the target system," in a 16:34
manner similar in which the user operates, and 16:34
then it cites to column 8 line 65 to column 9 16:34
line 4. 16:34

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Do you see that? 16:34

A. Yes, I see that. 16:34

MS. NGUYEN: Objection form. 16:34

Q. Do you think that the board properly understood the technical solution that the '664 patent was offering at column 8, line 65 through column 9, line 4? 16:34

A. Sorry, I was commenting -- I do have the '664? Oh, yeah. 16:35

Q. I gave you the '664. 16:35

I am going to give you the original Exhibit 9 which is the '732 patent because I know you'll ask for that next. 16:35

A. Yes, it's basically repeating what is in those elements by just removing some -- removing some words, but basically providing the information that is in that paragraph. 16:36

Q. Is the information from column 8 a proper explanation of the technical solution being offered in the '664 patent? 16:36

A. Being one of the specifications, then it is in the '664 patent and it is properly providing because we are actually verbatim talking about it. 16:37

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Q. Do you think that the language that we are looking at from the '664 patent is related to the technical solution claim in claim 1 of the '664 patent? 16:37

MS. NGUYEN: Objection, form. 16:37

A. Yeah, these two relate to each other. 16:38

Q. Does claim 1 of the '664 patent talk about using the natural language input to -- I'm sorry. Let me rephrase that. 16:38

Does claim 1 of the '664 patent relate to use a natural language interface to receive input from the user? 16:38

A. Yes, it does. 16:38

MS. NGUYEN: Objection, form. 16:39

Q. And what language in claim 1 relates to that concept? 16:39

A. Using -- at the beginning of claim 1, "using a natural language interface receiving input from a user as part of a natural language conversation between the natural language interface and the user, wherein the natural language conversation comprises a first natural language input from the user," and this is what 16:39

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we were referring to, right? 16:39

Q. And then it continues and says, "and based thereon, select an automated" -- I'm sorry -- yeah, "and based thereon select an automated process to be executed." 16:39

Does that relate to claim 1 of the '664 patent? 16:39

A. So this is where it is -- it says based on and this is actually a quotation from the specifications. And the claim says on the first. 16:40

So the claim is likely -- right -- 16:40

Q. Look at line 24 of the claim. 16:40

A. I'm on -- sorry? 16:40

Q. Look at line 24 of the claim. 16:40

A. Determine -- yes, it does, yeah. 16:40

Q. Yeah, what? 16:41

A. So it relates to the paragraph, the part of the paragraph where -- so here, where it says -- we are on "based on," right? And based on -- that's where we are starting, right? 16:41

Q. So we are asking whether "Based thereon, select an automation process to be executed" relates to claim 1 of the '664. 16:41

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A. Yes, so if we look at the second 16:41
part of 1, it says that automation -- hang on 16:42
one second. I found it before. When -- 16:42
Q. Are you referring to "determining 16:42
based on the first and second natural language 16:42
inputs from the user in automation process as 16:42
configured"? 16:42
A. No. A combination of the beginning 16:42
of that and then the executing part at the end. 16:42
Because this is requiring the automation process 16:42
to be executed, not just con -- I'm looking at 16:42
the beginning and end of that paragraph sort of 16:42
it. 16:42
Q. Where it says "executing a 16:42
functionality of the displayed user interface," 16:42
that's the execution? Is that what you were 16:42
referring to? 16:42
A. That's what I was referring to. 16:42
Because it says, "Wherein the user 16:42
interface of the computer program is configured 16:42
to display on a screen, wherein the -- wherein 16:42
each interaction of the sequence of interactions 16:43
comprises an action selected from a group of -- 16:43
group consisting of inputting data to the 16:43

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displayed user interface and executing the 16:43
functionality of the displayed user interface 16:43
executing the automation process." 16:43
So I'm sort of -- "and" -- but 16:43
that's also important. You need to go to the 16:43
next -- so it's a combination of B and C. 16:43
Q. So you understand that "Based 16:43
thereon, select an automation process to be 16:43
executed," relates to the portion of claim 1 16:43
starting on line 24 that begins "determining 16:43
based on the first and second natural language 16:43
inputs from the user," and continuing all the 16:43
way down to the end of the claim with the 16:43
"executing new automation process." 16:43
Is that correct? 16:43
A. It encompasses -- so all of that, of 16:43
course, is a lot more. But it encompasses what 16:43
is in the description that they quoted -- that 16:43
the patent board quoted on that page. 16:44
Q. And then it continues, "Where the 16:44
automation process may be executed in a manner 16:44
that manipulates the graphical user interface of 16:44
the target system in a manner similar to the 16:44
manner in which the user operates." 16:44

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A. This goes back in the middle of the 16:44
determining part. 16:44
Q. Can you read the portion that you 16:44
think it relates to? 16:44
A. "An automation process configured to 16:44
perform an automation of the sequence of 16:44
interactions with a displayed user interface of 16:44
a computer program and to simulate user 16:44
interaction with the displayed user interface of 16:44
the computer program." 16:44
Q. Okay. 16:44
A. And so on. 16:44
Q. Now, with respect to the '732 16:44
patent, I want you to look at claim 1 and go 16:44
through the same paragraph which is also quoted 16:44
on page 3 except they give the column line 16:45
numbers from the '732 patent and say '732. 16:45
Do you see that? 16:45
A. Yes, starting from the '732 patent. 16:45
Q. Right, starting with "to use a 16:45
natural language interface." 16:45
A. So we have that already. 16:45
Q. In the claim 1 of the '732 patent? 16:45
A. But we also have it in -- 16:45

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Q. I'm moving on. 16:45
A. -- '664. 16:45
Q. I told you we are going to go 16:45
through all three of them. 16:45
A. Okay -- I thought we got-- 16:45
Q. Don't put it away because you are 16:45
going to need it later. 16:45
So I want to know whether the '732 16:45
patent, which is right here, Beigi Exhibit 9, I 16:45
want you to look at claim 1, and I want to 16:45
understand whether the technical solution that 16:45
is talking about using a natural language 16:45
interface to receive input from the user, et 16:46
cetera, that we just talked about relates to 16:46
claim 1 of the '732 patent. 16:46
A. Well, there is the defining, this is 16:47
the second -- after the preamble of 1, it says, 16:47
"defining a conversation to be implemented by a 16:47
natural language interface," where we have to 16:47
use a natural language interface, that's that. 16:47
"Wherein the conversation is 16:47
configured to obtain from the user input from 16:47
the user, one or more values to one or more 16:47
parameters associated with the automation 16:47

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process," and then we have, "Based thereon, 16:47
select the automation process" -- do you want me 16:47
to go that far yet? Or just- 16:47
Q. You can do the whole paragraph, that 16:47
will save us time. Please. 16:48
A. So we need really the last part to 16:48
take care of -- like 1[c] to take care of the 16:48
execution part of it because it says that, 16:48
"Publish conversation to be accessible to a user 16:48
via natural language interface, wherein the user 16:48
is enabled to interact with the natural language 16:48
interface in accordance with the conversation 16:48
whereby the parameterized automation process is 16:49
invoked automatically by the natural language 16:49
interface and using one or more values provided 16:49
by the user to the natural language interface 16:49
for the one or more parameters," which I'm 16:49
assuming goes back to the parameters in the 16:49
automation. 16:49
And so that would be allowing to 16:49
execute, because you are now -- basically that's 16:49
the action. 16:49
Q. And the invoking is the executing 16:49
that you are talking about? The claim language 16:49

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where it says "invoking," et cetera, is where you are talking about as being executing? 16:49 16:49

MS. NGUYEN: Objection, form. 16:49

A. So we have to also go back to 1[b] because this just says how you actually get the parameters. 16:50 16:50 16:50

Q. Right. 16:50

A. And then 1[b], the middle of 1[b] which says -- 16:50 16:50

Q. "Utilize a displayed user interface," is that where you are looking? 16:50 16:50

A. To utilize a displayed user interface of a computer program to simulate sequence of interactions with the displayed user interface of the computer program and execute," this is the part I meant, "execute the functionality of the computer program." 16:50 16:50 16:50 16:50 16:50 16:50 16:50

Q. Okay. And so the graphical user interface of the target system is referring to the user interface in a computer program in the claim, is that right? 16:51 16:51 16:51 16:51

A. Yes. 16:51

Q. So now let's go to the next paragraph -- 16:51 16:51

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A. Of which one? 16:51

Q. The '664. So the first sentence says -- 16:51

A. Go ahead. 16:51

Q. So the first sentence says, "The '664 patent discloses exemplary embodiments for a nonprogrammer user to define a flow of conversation for a chatbot," and then the cites figures 1 through 3 as examples. 16:51

Do you see that? 16:51

A. I see it. But let me go through 1 through 3. So I can be confident. 16:51

Q. Absolutely. And to spare you, you will see that the identical sentence is in with respect to '732, except for it says "'732 patent" instead of '664. 16:52

A. Yes, I see that. 16:52

Q. And it is saying that figures 1 through 3 are examples of a nonprogram user to define a flow of conversation for a chatbot. Right? That's what the board said? 16:52

MS. NGUYEN: Objection, form. 16:52

A. If -- the board says that these are exemplary embodiments basically. 16:53

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Q. For a nonprogrammer user to define the flow of conversation for a chatbot. Right? 16:53 16:53

A. Yes. 16:53

Q. Do you agree with the board that figures 1 through 3 are showing exemplary embodiments for a nonprogrammer user to define a flow of conversation for a chatbot? 16:53 16:53 16:53 16:53

MS. NGUYEN: Objection, form. 16:54

A. Well, in 23, figure -- I'm sorry, figure 2 has two parts, and then 3 -- figure 2 has a lot of parts. See it's three parts. 16:54 16:54 16:54

And so let me look at 3, I hadn't looked at three. I just looked at 2B. 16:55 16:55

Q. No problem. 16:55

A. Well, figure 2 simply selects conversations in the actual -- because what we are talking about here may define -- I'm sorry, let me go back. 16:55 16:56 16:56 16:56

Q. We are talking about -- 16:56

A. "Define a flow of conversation for a chatbot." 16:56 16:56

Q. We are talking about a nonprogrammer user to define a flow of conversation for the -- a chatbot? 16:56 16:56 16:56

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A. Yes. 16:56

So what I'm saying is that figure 2, 16:56
which has three parts, in every part of it, it 16:56
is selecting a conversation. Not defining the 16:56
conversation. Right? 16:56

And then figure 1 gets the 16:56
conversation definitions from somewhere and has 16:56
a chatbot editor. So I'm assuming that -- and 16:56
this is an assumption that -- based on this 16:57
figures only -- that the chatbot editor allows 16:57
to you do what is requested here. And then 3, 16:57
create a conversation and define a conversation 16:57
flow. 16:57

So this is specifically saying 16:57
define a conversation flow. 16:57

So that figure 3 is probably more 16:57
relevant to what is stated here, but they are 16:57
stating that 1, 2 and 3 are related. 16:57

Q. Do you think the board didn't 16:57
understand the difference between figure 3 and 16:57
figure 2? 16:57

MS. NGUYEN: Objection, form. 16:57

A. I'm not saying didn't understand. 16:57
What I am saying is that they gave figures 1 16:57

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through 3 this context as well. I'm sure they 16:57
meant to provide context and these are related. 16:57
Figure 3 I think is specific to, very relevant 16:57
to what is done here. 16:57
Q. In the '732 patent also? 16:58
A. We are talking about '664 right now. 16:58
Q. It's the same disclosure, right? 16:58
A. Okay, what do you want me to look 16:58
at? 16:58
MS. NGUYEN: Objection, form. 16:58
Q. So you think that figure 3 is the 16:58
most relevant figure for talking about 16:58
embodiments of a nonprogrammer user to define 16:58
the flow of conversation for a chatbot and 16:58
figure 1 is next most relevant because it has a 16:58
chatbot editor which would do the defining but 16:58
figures 2 are less relevant for that purpose, is 16:58
that correct? 16:58
MS. NGUYEN: Objection. 16:58
Q. Did I summarize correctly what you 16:58
said? 16:58
MS. NGUYEN: Objection, form. 16:58
A. What I am saying figures 2A, B and C 16:58
are selecting. When you select, you are 16:58

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selecting from available set. Agreed? 16:58

So it's selecting. Whereas what I 16:58

read here is define the flow of conversation, as 16:58

opposed to select a conversation, the 16:59

conversation, the flow. 16:59

Q. So when you were looking at claim 1 16:59

of the '732 patent that includes a corresponding 16:59

defining a conversation element, right? 16:59

A. It has a three-part, '732. 16:59

Q. One of which is defining a 16:59

conversation -- 16:59

A. Defining -- defining, associating 16:59

and publishing. 16:59

Q. Right. Which corresponds to figure 16:59

3 which you said was more relevant for a 16:59

nonprogrammer user to define a flow of 16:59

conversation for a chatbot, right? 16:59

A. I was saying that figure 3 16:59

specifically states that. 16:59

Q. Right. 16:59

A. That statement, yes. 16:59

Q. That makes it more relevant in your 16:59

mind? 16:59

MS. NGUYEN: Objection, form. 16:59

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A. No, it's just more direct. Not 16:59
necessarily more relevant, but I'm saying it's 16:59
more direct. I'm saying figure 3 is a more 16:59
direct specification that is here. 17:00

Q. And do you think the board is 17:00
correct to cite figure 1, all of the figure 2s 17:00
and figure 3 for the proposition that each of 17:00
these patents discloses exemplary embodiments 17:00
for a nonprogrammer user to define a flow of 17:00
conversation for a chatbot? 17:00

MS. NGUYEN: Objection, form. 17:00

A. Let me look at 64. 17:00

Well, I can tell you that neither 17:01
one of these figures on their own are talking 17:01
about the nonprogrammer user to define. 17:01
Nonprogrammer user to define. Because they 17:01
don't specifically say that this is not -- the 17:01
figures. I'm not talking about the 17:01
specification. 17:01

You are asking me to look at the 17:01
figures and -- look at the figures and the 17:01
relevance to what is stated here, and I'm saying 17:01
that the figures by themselves don't necessarily 17:01
tell you that each of these are nonprogrammer or 17:01

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programmer based. 17:01

Q. So in your opinion, the figures 1, 17:01
each of the figures 2 and figure 3 from each of 17:01
the patents do not support the board's 17:01
proposition that the patents disclose exemplary 17:01
embodiments for a nonprogrammer user to define a 17:01
conversation flow for a chatbot, is that 17:01
correct? 17:02

MS. NGUYEN: Objection form. 17:02

A. That is not what I said. 17:02

What I said is just looking at the 17:02
figures -- because the board I am sure was 17:02
looking at the figures in context of the 17:02
specification of the patent and claims and the 17:02
rest of the specification. And a description of 17:02
the figure. 17:02

What I am saying is just looking 17:02
at -- which is what you asked -- just looking at 17:02
the figures, the three figures, sets of figures, 17:02
the three figures, the figures don't 17:02
specifically tell you, the figures, don't 17:02
specifically tell you that any part of this -- 17:02
not any part, but some parts of this are not 17:02
necessarily -- so when it says "select a 17:02

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conversation of the chatbot," it doesn't 17:02
specifically tell you that this is for a 17:02
nonprogrammer, and it doesn't say that creating 17:02
a conversation is for a nonprogrammer. The 17:02
figure doesn't state that. That's -- I think 17:02
that's what you are asking. 17:03
Q. I didn't say the figure alone, 17:03
because it says, "see e.g. figures 1 through 3," 17:03
which means that you can include additional 17:03
information. 17:03
But I want to know whether you agree 17:03
or disagree with the board's characterization 17:03
where it cites to Exhibits -- to each of the 17:03
patents, figures 1 through 3, as supporting the 17:03
proposition that each of the patents disclose 17:03
exemplary embodiments for a nonprogrammer user 17:03
to define flow of conversation for that chatbot. 17:03
MS. NGUYEN: Objection. 17:03
Q. For a chatbot? I'm sorry. 17:03
A. Let me read to myself. Let me read 17:03
the -- just for my refreshment -- the 17:03
description that the patent gives for these 17:03
figures. Because that has to be coming with the 17:03
figures, right, not just the figures themselves. 17:03

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Q. I'm just trying to understand 17:03
whether you agree or disagree with what the 17:03
board wrote. 17:03
A. Well, I'm -- let me read -- 17:03
Q. If you need to read the description 17:03
to know whether the figures support that, then 17:03
you can do that. Counsel wants to end in ten 17:03
minutes. And I do have other questions I would 17:04
like to get to, but you do what you need to do. 17:04
A. Let me read this. 17:04
Q. Dr. Beigi, if you are not sure, we 17:06
can withdraw the question and move on. 17:06
A. I'm doing one by one, so I can tell 17:06
you about one I saw referenced in the body of 17:06
the -- in the specification of the patent which 17:06
does specify that it is for -- let me -- 17:06
Q. A nonprogrammer user? 17:07
A. For a nonprogrammer user. And then 17:07
I was looking at 2 when you asked me. 17:07
Q. If you don't mind, I would like to 17:07
move on to another question. 17:07
A. Okay. 17:07
Q. The opinions in all three cases go 17:07
on to say, "For example, a user may define which 17:07

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questions the bot would ask, which remarks it 17:07
will make and flow control operations that would 17:07
be based on the value conditions," with a cite 17:07
to the quotes, and then it goes further, "The 17:07
user may define for a conversation flow which 17:07
automation process is invoked or that a 17:07
conversation flow is associated with multiple 17:07
automation processes, one of which may be 17:07
selected based on interaction with the user," 17:07
again cite to the quote, and then "the 17:07
automation process may also be defined by a 17:07
user." 17:07
In each of those examples that the 17:07
board calls out, they point out the role of the 17:08
user in the definition process. 17:08
Do you see that? 17:08
A. Yes. 17:08
Q. Do you believe that the board 17:08
properly understood the disclosure of the three 17:08
patents as involving a user in the definition 17:08
process? 17:08
MS. NGUYEN: Objection, form. 17:08
Q. With respect to the conversation 17:08
flow? 17:08

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A. With respect to the conversation 17:08
flow, a user may define a conversation, yes. 17:08
MR. MACEDO: Okay, Counsel, I know 17:08
you wanted a break. 17:08
I would like to do one more question 17:08
and maybe go five minutes over, but I 17:08
promise I will make it quick. 17:08
MS. NGUYEN: Sure. 17:08
Q. So on the next page, you see all the 17:08
patents are referring to figure 2A, in the 17:08
sheet? 17:08
A. I will just compare. 17:09
Yes. 17:09
Q. Okay. Now, your understanding is 17:09
that figure 3 is more relevant to the definition 17:09
process is which is being covered in the '732 17:09
patent than figure 2A, is that correct? 17:09
MS. NGUYEN: Objection, form. 17:09
A. That was where I was actually -- I 17:09
was looking at 2A. 17:09
So when you said you wanted to 17:09
change the line of questioning -- 17:09
Q. Okay, I'll withdraw that question 17:09
until tomorrow and ask you a different one. 17:09

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Do you see where it says, "After the chatbot is launched, step 210, the user may interact with the chatbot using natural language processing techniques and the appropriate conversation may be selected, step 220." 17:09

A. Yes. 17:09

Q. Do you understand that that is relevant for the '664 patent? 17:09

MS. NGUYEN: Objection, form. 17:10

Q. And when I said '664 patent, I meant claim 1. 17:10

A. Claim 1. Yes. 17:10

Q. And how is it relevant? 17:10

A. Sorry, ask the question how it is relevant -- 17:10

Q. The statement that after the chatbot is launched, step 210, the user may interact with the chatbot using natural language processing techniques? 17:11

A. That's the part I've lost. I'm sorry, where is that? 17:11

Q. This is on page 4, it's one, two, three, four, five -- six lines from the bottom. 17:11

A. Okay. After the chap is launched. 17:11

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Q. Right. So we were looking at, 17:11
"After the chatbot is launched, step 210, the 17:11
user may interact with the chatbot using natural 17:11
language processing techniques and the 17:11
appropriate conversation may be selected, step 17:11
220," with a cite to the specification. 17:11
A. Yes, yes, I see that. 17:11
Q. And what I want to know how does 17:11
that relate to claim 1 of the '664 patent? 17:11
MS. NGUYEN: Objection, form. 17:13
A. So you're asking me to relate this 17:13
statement to claim 1? 17:13
Q. Of the '664. 17:13
MS. NGUYEN: Same objection. 17:14
A. The only thing that I can see that 17:16
may possibly be relevant is the second part of 17:16
the claim. 17:16
But -- 17:16
Q. Which language are you -- which 17:16
language are you referring to? 17:16
A. I'm not quite sure with that because 17:16
it says, "Based on the first and second natural 17:16
language inputs from the user and automation 17:16
process interaction." I'm sorry -- "an 17:16

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automation process configured to perform an 17:16
automation of a sequence of interactions with a 17:16
displayed user interface," and so on and so 17:16
forth. Because what this statement is asking 17:16
for, so it says, "user interacts with the 17:16
chatbot using natural language techniques -- 17:16
process techniques and the appropriate 17:16
conversation may be selected." 17:16
So the appropriate conversation, not 17:16
the appropriate automation. The appropriate 17:16
conversation is selected. 17:16
Q. And that's -- 17:16
A. So I am not seeing that and I'm -- 17:17
maybe it's just because I'm really tired at the 17:17
end of the day, but I cannot -- I don't see 17:17
where you're selecting a conversation in claim 17:17
1. 17:17
Q. And do you think that, putting aside 17:17
the selection, that it talks about the user may 17:17
interact with the chatbot using natural language 17:17
techniques, do you think that that's referring 17:17
to the natural language interface that's being 17:17
used in the first element of claim 1? 17:17
MS. NGUYEN: Objection, form. 17:17

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A. Well, I think it's a combination, 17:17
not just that part, but I think it's a 17:17
combination of the -- 1[a] and 1[b] which says 17:17
that you are using natural language processing 17:18
techniques, or NLP, because receiving an input 17:18
from a -- this is now I'm going to the first 17:18
part. 17:18
Receiving an input is just receiving 17:18
an input. Right. So it hasn't used natural 17:18
language processing yet. 17:18
As part of the natural language 17:18
conversation between the natural language 17:18
interface and the user, wherein the natural 17:18
language conversation comprises a first natural 17:18
language input from the user, a natural language 17:18
feedback on the first natural language input and 17:18
the natural language -- from the natural 17:18
language interface, I'm sorry, and the second 17:18
natural language input from a user in response 17:18
to the natural language feedback. 17:18
But yet, we haven't talked about 17:18
natural language processing part of it. 17:18
Then we say determining based on the 17:18
first and second natural language input from the 17:19

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user and automation process configured. 17:19

So here is I think where natural 17:19

language processing is being used because 17:19

determining based on the first and second 17:19

natural language input from the user, an 17:19

automation process is configured to perform an 17:19

automation of the sequence of interactions. 17:19

So here, it establishes that natural 17:19

language processing is used. 17:19

Q. Perfect, thank you. 17:19

MR. MACEDO: We will stop for today 17:19

and we will see you tomorrow morning at 9 17:19

o'clock and hope you get a good night's 17:19

rest. Thank you very much for were your 17:19

time. I appreciate it. 17:19

(Time noted: 5:19 p.m.) 17:19

_____
HOMAYOON BEIGI

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

_____

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CERTIFICATE

STATE OF NEW JERSEY)
)ss:
COUNTY OF UNION)

I, MARY F. BOWMAN, a Registered Professional Reporter, Certified Realtime Reporter, and Notary Public within and for the State of New Jersey, do hereby certify:

That HOMAYOON BEIGI, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or 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 14th day of November, 2024.

MARY F. BOWMAN, RPR, CRR

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* * *ERRATA SHEET* * *

NAME OF CASE: Whatfix v. Walkme

DATE OF DEPOSITION: 11.11.24

NAME OF WITNESS: HOMAYOON BEIGI

Reason codes:

1. To clarify the record.
2. To conform to the facts.
3. To correct transcription errors.

Page ____ Line ____ Reason____
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