

AMERICAN ARBITRATION ASSOCIATION
BEFORE THE PATENT TRIAL AND APPEAL BOARD

Walt Disney Parks and Resorts U.S., Inc.,
Petitioner,
v.
Agile Journeys LLC,
Patent Owner.

Case No. IPR2024-00029
U.S. Patent No. 7,212,983

VIDEOTAPED DEPOSITION OF
GREGORY JOSEPH GONSALVES, PH.D.

Thursday, September 19, 2024; 10:08 a.m. EDT

Reported by: Cindy L. Sebo, RMR, CRR, CLR, RPR,
CCR, CSR, RSA, CA CSR 14409, NJ Certified CR
30XI0024460, NJ Certified RT 30XR00019500, NM CSR
589, NY Realtime Court Reporter, NY Association
Certified Reporter, OR CSR 230105, TN CSR 998, TX
CSR 12778, WA CSR 23005926, Remote Counsel Reporter,
LiveLitigation Authorized Reporter, Notary Public
Job No. 6883727

Videotaped Deposition of GREGORY JOSEPH GONSALVES, PH.D., held at the law offices of Wolf Greenfield, 601 Massachusetts Avenue, Northwest, Fifth Floor, Washington, D.C. 20001, before Cindy L. Sebo, Registered Merit Court Reporter, Certified Real-Time Reporter, Certified LiveNote Reporter, Registered Professional Reporter, Certified Court Reporter, Certified Shorthand Reporter, Real-Time Systems Administrator, California Shorthand Reporter 14409, New Jersey Certified Court Reporter 30XI00244600, New Jersey Certified Realtime Reporter 30XR00019500, New Mexico CSR 589, New York Realtime Certified Reporter, New York Association Certified Reporter, Oregon CSR 230105, Tennessee CSR 998, Texas CSR 12778, Washington CSR 23005926, Remote Counsel Reporter, LiveLitigation Authorized Reporter and Notary Public, beginning at approximately 10:08 a.m. EDT, when were present on behalf of the respective parties:

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

Attorneys for Petitioner:

HOGAN LOVELLS

SCOTT A. HUGHES, ESQUIRE

JOSEPH (JOE) J. RAFFETTO, ESQUIRE

Columbia Square

555 Thirteenth Street, Northwest

Washington, D.C. 20004

202.637.3659

scott.hughes@hoganlovells.com

joseph.raffetto@hoganlovells.com

Attorneys for Patent Owner:

KEY IP LAW GROUP, PLLC

JAY P. KESAN, PH.D., ESQUIRE

1934 Old Gallows Road, Suite 350

Vienna, Virginia 22182

703.752.6276

jay@keyiplaw.com

ALSO PRESENT:

FRED WALKER, Videographer

--o0o--

INDEX OF EXAMINATION

GREGORY JOSEPH GONSALVES, PH.D.

Walt Disney Parks vs. Agile Journeys LLC

Thursday, September 19, 2024

--o0o--

EXAMINATION BY	PAGE
Attorney Hughes	9, 131
Attorney Kesan	181

AFTERNOON SESSION	131
CERTIFICATE OF REPORTER	189
INSTRUCTIONS TO WITNESS	190
ERRATA	191
ACKNOWLEDGMENT OF WITNESS	193

--oOo--

INDEX TO EXHIBITS

GREGORY JOSEPH GONSALVES, PH.D.

Walt Disney Parks vs. Agile Journeys LLC

Thursday, September 19, 2024

--oOo--

(Exhibits Provided to Reporter.)

GONSALVES

DEPOSITION

EXHIBIT NUMBER	DESCRIPTION	PAGE
Exhibit 1	Memorandum and Order	62

REFERRED TO EXHIBITS	PAGE
Exhibit 1001	67
Exhibit 1005	148
Exhibit 1006	162
Exhibit 1007	131

--oOo--

P R O C E E D I N G S

--oOo--

--oOo--

Washington, D.C.

Thursday, September 19, 2024; 10:08 a.m. EDT

--oOo--

THE VIDEOGRAPHER: Good morning.

And we are on the video record at
10:08 a.m.

Please note that the microphones
are sensitive and may pick up whispering
and private conversations. Please mute
your phones at this time.

Audio and video recording will
continue to take place unless all parties
agree to go off the record.

This is Media Unit 1 of the
videorecorded deposition of
Dr. Gregory J. Gonsalves, in the matter
of Walt Disney Parks and Resorts U.S.,

1 Incorporated versus Agile Journeys LLC,
2 filed in the United States Patent and
3 Trademark Office, Case Number
4 IPR2024-00029.

5 We are at the location of
6 Wolf Greenfield in Washington, D.C.

7 My name is Fred Walker,
8 representing Veritext Legal Solutions,
9 and I am the videographer. And the court
10 reporter today is Cindy Sebo, from the
11 firm of Veritext Legal Solutions.

12 I am not authorized to administer
13 an oath and I am not related to any of
14 the party in this action, nor am I
15 financially interested in the outcome.

16 If there are any objections to the
17 proceeding, please state them at the time
18 of your appearance.

19 Counsels will be noticed
20 stenographic -- on the stenographic page,
21 and now state their appearances and
22 affiliations for the record, beginning

1 with the noticing attorney.

2 ATTORNEY HUGHES: My name is
3 Scott Hughes, from Hogan Lovells, counsel
4 for Petitioner.

5 ATTORNEY KESAN: I'm Jay Kesan for
6 -- from Key IP for Agile Journeys and for
7 the deponent, Dr. Gonsalves.

8 --oOo--

9 GREGORY JOSEPH GONSALVES, PH.D.,
10 after having been first duly sworn under penalty
11 of perjury by the certified stenographer to tell
12 the truth, the whole truth and nothing but the
13 truth, testified herein as follows:

14 --oOo--

15 CERTIFIED STENOGRAPHER: Thank
16 you.

17 The witness is sworn, Counsel.

18 --oOo--

19 THE VIDEOGRAPHER: You may begin.

20 ///

21 ///

22 ///

--000--

EXAMINATION BY COUNSEL FOR PETITIONER

--000--

BY ATTORNEY HUGHES:

Q. All right. Good morning,
Dr. Gonsalves.

A. Good morning.

Q. Could you please state your full
name for the record?

A. Yes. My name is Gregory Joseph
Gonsalves.

Q. And you understand that you are
being deposed today in connection with
declarations you submitted in an IPR proceeding,
right?

A. Yes.

Q. And for the record, that IPR
proceeding is IPR2024-00029, correct?

A. That's correct.

And I also brought a copy of my
declaration here with me --

Q. Okay.

1 A. -- there are no marks on it. You
2 can look at it if you wish, but I can assure you
3 there aren't any.

4 Q. And do you have any other materials
5 with you, other than that copy of your
6 declaration?

7 A. No.

8 Q. Okay.

9 Okay. IPR2024-00029 is related
10 to U.S. Patent 7,212,983, correct?

11 A. Yes.

12 Q. And you're familiar with the --
13 with that patent?

14 A. Yes.

15 Q. If I refer to it as the "'983
16 patent," will you understand that?

17 A. Sure.

18 Q. Okay. And you understand that you
19 are under oath, right?

20 A. Yes, I do.

21 Q. Is there anything that would
22 prevent you from testifying truthfully and

1 accurately today?

2 A. No.

3 Q. Okay. I'd just like to go over a
4 couple ground rules for this deposition.

5 I'm sure you understand how
6 this goes, but if you don't understand a
7 question, please ask me for clarification. Your
8 counsel may object, but you still need to answer
9 the question unless specifically instructed not
10 to.

11 We should avoid talking over
12 each other. And in answering questions, please
13 don't nod or use hand gestures. We will need an
14 audible answer so the court reporter can
15 transcribe.

16 Does that all sound fair to
17 you?

18 A. Sure.

19 Q. Okay. What did you do to prepare
20 for your deposition today?

21 A. I reviewed the documents in this
22 case on Monday and Tuesday and a portion of the

1 day yesterday.

2 Q. When you say "the documents in this
3 case," what documents are those?

4 A. Well, they were the documents of
5 record in the IPR that you mentioned.

6 Q. And did you review all of them?

7 A. No, I didn't review all of them.
8 Some of them are not really related. You know,
9 like a deposition notice, or something, was in
10 there. I didn't look at that. I didn't look at
11 a power of attorney, and things like that.

12 I looked at the documents that were
13 meaningful.

14 Q. Did you meet with anyone in
15 preparing for your deposition?

16 A. So when you say "meet," I assume
17 you're saying either on the phone or physically.

18 Q. In -- remote or in person, yes.

19 A. Okay. So yes, I did meet with
20 counsel for Agile Journeys.

21 Q. And which counsel did you meet
22 with?

1 A. Mr. Kesan, who's sitting across
2 from you --

3 Q. Anyone else?

4 A. -- and Mr. Andrew Wright.

5 Q. Okay. And when did you meet with
6 them?

7 A. I met with them on Tuesday.

8 Q. And for how long did you meet?

9 A. It was about a couple of hours,
10 maybe a little bit less.

11 Q. Okay. Now, you mentioned you
12 reviewed the materials that you thought were
13 meaningful in this.

14 How did you select which
15 materials were meaningful?

16 A. Well, any documents that were --
17 involved the substantive issues in the IPR, for
18 instance, my declarations; the declarations of
19 the expert of Walt Disney; the prior architect;
20 the patent; you know, the -- any document other
21 than administrative documents, like the power of
22 attorney forms, for example.

1 Q. Did you review any materials that
2 are not discussed in your declaration?

3 A. Okay. So I guess I would have to
4 look through my declaration to look at every
5 document that was discussed in order to answer
6 that question accurately.

7 What I can say is what I said
8 before, that I reviewed the pertinent documents
9 from the record of the IPR. And I didn't review
10 any documents other than what's of record in the
11 IPR.

12 Q. Okay. So to be clear, the only
13 materials you reviewed are what's of record in
14 this IPR proceeding?

15 A. That's right.

16 Q. Okay. Were there any materials you
17 asked to review but did not receive?

18 A. No.

19 Q. So as we discussed earlier, you're
20 aware you are being deposed with respect to the
21 declaration that you submitted in this
22 proceeding, right?

1 A. That's right.

2 Q. How many hours did you spend
3 preparing your declaration for -- for this IPR?

4 A. So when you say preparing my
5 declaration, I prepared two declarations. I'm
6 assuming that you're mentioning -- referring to
7 the latest declaration that I did.

8 Q. Yes. That would be Exhibit 2009 to
9 the IPR, correct?

10 A. Yes. That's the one that's in
11 front of me now.

12 So the answer is I'm not sure. I
13 would have to look at my time entry records.

14 Q. Do you have a ballpark?
15 Five hours? Ten hours?

16 A. Well, it was more than that. I
17 suspect I spent -- again, this is just a very
18 gross estimate. It probably took, you know,
19 somewhere around three or four days, or something
20 like that.

21 Q. And you mentioned an earlier
22 declaration that you had given.

1 That was your declaration in
2 support of the patent owner's preliminary
3 response, correct?

4 A. That's correct.

5 Q. And about how much time did you
6 spend preparing that declaration?

7 A. So I don't know exactly. I would
8 have to look at my time records, but it was
9 probably about the same. A gross estimate is
10 maybe four days.

11 Q. Okay. And talking about
12 Exhibit 2009, which was your declaration in
13 support of the patent owner's response to the
14 Petition, who drafted that declaration?

15 A. So everything that's in the
16 declaration is my opinion.

17 Now, did I write every single word
18 in here and correct every single typo? I would
19 have to say no, I didn't do that. This expert
20 declaration was written in accordance with the
21 standard way that all experts write declarations
22 in that the thoughts are mine, but sometimes it

1 was edited for format or typos, or things of that
2 nature, by counsel for Agile Journeys.

3 Q. Did -- did you do the first draft
4 of the declaration?

5 A. I remember that I -- that I
6 prepared the initial draft of the declaration.

7 Q. Now, you understand that this
8 declaration was in support of the owner's
9 response to the IPR Petition, correct?

10 A. Yes. That's what it says on the
11 cover.

12 Q. Were you involved in the drafting
13 of the patent owner's response?

14 A. No.

15 Q. And you mentioned that some of the
16 declaration would have been edited for formatting
17 or some others may have done it.

18 Who -- who else would have
19 done --

20 A. So in --

21 Q. -- in -- the initial drafting?

22 A. -- in relation to -- I'll answer

1 that question, but in relation to your previous
2 question, when you asked if I was involved in the
3 patent owner response, "involved" is kind of a
4 general term.

5 I didn't write the patent owner
6 response; however, I believe that counsel for
7 Agile Journeys considered my opinions from my
8 declaration, for example, in drafting the patent
9 owner response.

10 So I guess if you have a general
11 definition of "involved," then I was involved at
12 least to that extent.

13 And then you asked another
14 question, but when I went back to the previous
15 one, I forgot what the most recent question was.
16 So if you could repeat it.

17 Q. Yeah. I had -- I had asked -- you
18 had mentioned that others may have done some
19 drafting in this, including editing.

20 Who else would have done
21 drafting of your declaration?

22 A. Who else would have done drafting?

1 Again, I should say that all of the
2 substantive material in -- in this -- my
3 declaration are -- are my opinions. And -- but
4 others, for instance, counsel for Agile Journeys,
5 may have done some formatting and corrected some
6 typos, and things of that nature.

7 Q. So did you draft all of the
8 substantive material in your declaration?

9 A. Yes.

10 Q. And what did you rely on in
11 preparing your declaration?

12 A. So I relied upon the documents of
13 record in the IPR.

14 Q. And that would be the documents of
15 record at the time you submitted the declaration?

16 A. Sure. If they didn't exist at the
17 time that I submitted a declaration, I could not
18 have relied on them --

19 Q. Okay.

20 A. -- and I also obviously have been
21 at this quite a while. I have a doctorate in
22 computer engineering, a Master's and a bachelor's

1 degree in electrical engineering. And I also
2 worked for many years as an engineer and
3 many years as a patent attorney.

4 So I guess I also relied on the
5 knowledge that I've accumulated over the course
6 of these many years, since I was a young man,
7 which was a long, long time ago.

8 Q. So you just mentioned, you know,
9 you have experience as -- as a patent attorney as
10 well.

11 Do you consider yourself an
12 expert in patent law?

13 A. You know, different people have
14 definitions for what they consider to be an
15 expert. I don't know if I'm a patent law --
16 well, considered to be a patent law scholar, but
17 I have worked as a patent attorney for
18 many years, and I've accumulated knowledge during
19 those years.

20 I am an expert for the subject
21 matter of this -- of this IPR.

22 Q. Do you consider yourself an expert

1 in other subject matter?

2 A. When you say "other subject
3 matter" --

4 Q. For example, patent practice and
5 procedure before the Patent Office?

6 A. I am very familiar with patent
7 procedure before the Patent Office, as I've
8 prosecuted -- I've prepared and prosecuted
9 hundreds of patent applications over the last
10 couple of decades.

11 And I also worked as a judge at the
12 Patent Trial and Appeal Board. I was employed at
13 the Patent Trial and Appeal Board for three
14 years.

15 So based upon my experience in
16 private practice and my experience as a judge at
17 the PTAB, I accumulated knowledge of what you
18 call "patent practices and procedures."

19 Q. My question is, Do you consider
20 yourself an expert in -- in that subject matter?

21 A. Yeah, I think so, particularly as
22 it pertains to this -- to this IPR.

1 Q. And are you testifying as an expert
2 in patent law in this proceeding?

3 A. So I think I -- I was -- in fact, I
4 know I was retained to be the expert on the
5 invalidity issues of this IPR. So that's what
6 I've been paid to do and that's what I was asked
7 to do. So that's what I'm testifying about.

8 Q. Okay. Are you testifying as an
9 expert in patent practice and procedure in this
10 IPR?

11 A. So, again, my answer's the same. I
12 was asked to testify about validity of the '983
13 patent in this IPR.

14 To the extent that that assignment
15 involves patent law and patent practices and
16 procedure, then I'm also testifying with respect
17 to that.

18 Q. So for invalidity, you mention some
19 legal principles in your declaration, right?

20 A. So if you could refresh my memory
21 and point me to the pages that you're thinking
22 about.

1 Q. So I think, for -- for the record,
2 we can mark your declaration as Exhibit 1.

3 ATTORNEY HUGHES: Would you like a
4 copy, too?

5 ATTORNEY KESAN: No; I'm good.

6 THE WITNESS: So can we go off the
7 record for a second?

8 CERTIFIED STENOGRAPHER: Hold on.
9 Go ahead.

10 THE VIDEOGRAPHER: Off the record?
11 We are going off the record at
12 10:24 a.m.

13 --oOo--

14 (Whereupon, a discussion was held
15 off the record.)

16 --oOo--

17 THE VIDEOGRAPHER: We are back on
18 the record, and the time is 10:27 a.m.

19 You may begin.

20 BY ATTORNEY HUGHES:

21 Q. Okay. So, Dr. Gonsalves, we've all
22 agreed that we will refer to your declaration by

1 the exhibit number of record as Exhibit 2009.

2 And if you go in your
3 declaration, for example, to Page 11, you have a
4 section called Fundamental Concepts Regarding
5 Invalidity, correct?

6 A. Yes. I see that on Page 11 of
7 Exhibit 2009.

8 Q. And as part of that, you go through
9 and talk about some legal concepts, including,
10 for example, anticipation in Paragraph 35?

11 A. Yes. I see that Paragraph 35
12 mentions that a claim is invalid if it is
13 anticipated or obvious.

14 Q. And in the paragraphs that follow,
15 you talk about obviousness as well and what --
16 what your understanding of that is, correct?

17 A. Yeah. For instance, in
18 Paragraph 36, I state that I understand
19 the patent claim is invalid if the claimed
20 invention would have been obvious to a person of
21 ordinary skill in the art at the time of the
22 purported invention.

1 Q. And you understand what a person of
2 ordinary skill in the art is, correct?

3 A. Yes, I do.

4 Q. Have you ever been deposed before?

5 A. Yes.

6 Q. About how many times have you been
7 deposed?

8 A. Again, this is a rough estimate:
9 It's probably about a half a dozen times.

10 Q. And have you ever testified at
11 trial or a hearing?

12 A. Yes, I have.

13 Q. About how many times?

14 A. I think three times.

15 Q. And you said you have a full copy
16 of your declaration in front of you?

17 A. Yes, I do.

18 Q. And does that include the
19 Attachment A to your declaration, starting at
20 Page 168?

21 A. Yes, it does.

22 Q. And this is a copy of your CV,

1 right?

2 A. Yes, it is.

3 Q. Okay. And the information in your
4 CV accurately reflects your education and work
5 experience, among other things, right?

6 A. Yeah, I would say so. I mean --
7 you know, it is a CV, so -- and it is a finite
8 length, so I didn't mention every single thing
9 I've done in my life. But it's a -- it's a --
10 like, a standard CV or résumé for explaining my
11 career and education.

12 Q. Is there anything in that CV that
13 you would like to change?

14 A. So I noticed, for instance,
15 there -- there's some typos -- or at least one
16 typo, like, on the -- on the very first page,
17 where it talks about my experience with software
18 design and development.

19 It says, Wrote hundreds of
20 thousands of lines of code; that part is
21 accurate. And -- and then it says, Objection
22 Oriented and Procedural Programming Languages.

1 Obviously "objection-oriented
2 language" makes no sense whatsoever. It should
3 be "object-oriented languages."

4 Q. Anything else?

5 A. There could be other typos in here,
6 but that's the one that I remember seeing.

7 Q. If we go to the last page of your
8 CV, this, starting from the top, lists your
9 education, correct?

10 A. That's correct.

11 Q. And you got a bachelor's degree in
12 electrical engineering from Northeastern
13 University in 1982, correct?

14 A. Yes.

15 Q. And then you got a Master's degree
16 in electrical engineering from Syracuse
17 University, right?

18 A. Yes.

19 Q. And that was in 1987?

20 A. Yes.

21 Q. And then in 1991, you got a Ph.D.
22 in computer engineering from Syracuse University,

1 correct?

2 A. Yes.

3 Q. And your dissertation was on
4 sequential and massively parallel techniques for
5 equivalence verification of synchronous
6 sequential logic; is that right?

7 A. That's correct.

8 Q. Is that work for your thesis
9 relevant to the '983 patent?

10 A. It's relevant in some respects.
11 The work that I did for my doctoral dissertation
12 involved automated design of integration
13 circuits. And in that process, you could, for
14 instance, start off with an abstract description
15 of the computing machine that you want to design.
16 And then there are a set of automation tools
17 which ultimately create a set of manufacturing
18 specifications for integrated circuits.

19 And so when you're finished, you
20 want to ensure that what you've created is
21 functionally equivalent to the abstract
22 description of the circuit that you started with.

1 So my dissertation involved the comparison of the
2 two to confirm that they were, in fact,
3 equivalent.

4 So this '983 patent does not --
5 does not have anything to do about automating the
6 design of integrated circuits; it's a different
7 subject matter.

8 However, you know, whenever you
9 have any project in computer engineering, you
10 have certain resources that are used -- certain
11 computing resources that are used, and you -- so
12 as a result, you have to schedule those
13 resources, because they're resources that are
14 shared among multiple processes that are running
15 on a computer.

16 So in some sense, it is somewhat
17 related because there was scheduling of resources
18 associated with my dissertation, and the '983
19 patent is also about scheduling of resources.
20 The resources are different. With the '983
21 patent, the resources are about, for instance,
22 the attractions at an amusement park. The

1 resources for my dissertation were different than
2 that, but at a high level, they both involve
3 scheduling of resources.

4 Q. What -- what were -- excuse me --
5 what were the resources in your dissertation?

6 A. So when you automate the design of
7 integrated circuits, integrated circuits have
8 different components. For instance, there are
9 certain -- there's control logic; there's a data
10 path and a device that you're computing -- that
11 you are designing; and there are interconnections
12 between the various components in an integrated
13 circuit.

14 So those are some of the resources
15 that are in an integrated circuit.

16 There are also resources in the
17 computing environment on which I developed my
18 software algorithm. Those resources include
19 processing power; they include memory; they
20 include interconnection devices, and things of
21 that nature.

22 Q. When you say "scheduling of

1 resources," what do you mean by "scheduling"?

2 A. So scheduling involves, you know,
3 what particular -- particular times, for -- for
4 example, time slices in a computing environment
5 that particular resources used. For instance --
6 and my dissertation was implemented on the
7 connection machine, which is a
8 single-instruction, multiple-data machine. And
9 it has many, many processors, thousands of them.

10 And so part of the implementation
11 was scheduling the processors to do -- to perform
12 certain functions.

13 With respect to the '983 patent,
14 the resources, for example, are the attractions
15 that a patron is interested in visiting at an
16 amusement park.

17 Q. So after your Ph.D., you also got a
18 juris doctorate degree from Georgetown
19 University, correct?

20 A. That's correct.

21 Q. And that was in 1997?

22 A. Yes. During most of the time -- or

1 nearly all the time that I was a law school
2 student, I was working as an engineer for IBM and
3 other companies.

4 I went to school at night.

5 Q. And if we can -- I guess we're
6 working backwards, but if you could turn the page
7 over.

8 There's not page numbers on
9 this Attachment A, but do you see the -- the page
10 right before your education? This is a listing
11 of your work experience, correct?

12 A. Yes, it is.

13 Q. And at the bottom, it lists
14 IBM/Loral.

15 Am I pronouncing that correct?

16 A. Sure. Loral acquired the federal
17 system division of IBM at some point while I was
18 working there. So I remember that I went to work
19 at the same place, parked in the same spot; it's
20 just that the sign at the entrance of the parking
21 lot was changed.

22 Q. And you list your title there as

1 staff scientist; is that right?

2 A. Sure. That was what my title was
3 when I left Loral.

4 Q. And did you have a different title
5 when you started at Loral?

6 A. Sure.

7 Well, I didn't start at Loral. I
8 started at IBM. It was only later that Loral
9 acquired a particular division from IBM that I
10 was working for.

11 Q. And the time frame you list for
12 working at those companies was 1983 to 1997; is
13 that right?

14 A. Correct.

15 Q. So what was your responsibilities
16 when you first started at IBM?

17 A. So I worked on the design and
18 development of software.

19 Q. What types of software?

20 A. You mean, what programming
21 languages?

22 Q. What was -- programming languages,

1 yes.

2 A. Okay. So I programmed because, you
3 know, I worked as a software designer and
4 developer for many, many years. I've programmed
5 in many different programming languages while I
6 was there. Some of the programming languages
7 that I developed code in includes PL/1, PL8,
8 Fortran, IBM 370 Assembler, C, C++, Java. The
9 list goes on, because I was there for quite some
10 time.

11 Q. And what was the technology that
12 that software was related to?

13 A. So part of the time that I was
14 there, it was associated with the automated
15 design of integrated circuits, which I tried to
16 explain a little bit to you earlier.

17 I also worked on scheduling
18 algorithms for air traffic control and for
19 satellites. So, for example, you know, at a very
20 high level -- I can't talk in detail about it
21 because I did have a security clearance for this
22 particular satellite project, but there are

1 constraints on satellites. They can't be at the
2 same position at the same -- two different
3 positions at the same point in time. There are
4 constraints on what images you need to take. So
5 I wrote algorithms and designed and developed
6 software to take images from satellites and
7 schedule the taking of images.

8 Q. And do you consider that work of
9 scheduling algorithms for air traffic control in
10 satellites to be relevant to the '983 patent?

11 A. Yeah, it is relevant because both
12 involve scheduling.

13 Q. Okay.

14 A. And also, I -- I -- I also worked
15 on air traffic control project, which is -- one
16 of the purposes is to make sure that two planes
17 are not occupying the same point in space at the
18 same time, because if that were to happen, that
19 would be bad for the pilot, for the passenger and
20 the plane. So that also involved scheduling
21 coordination.

22 Q. Now, is that all of the companies

1 you worked for between 1983 and 1997? Was it
2 just IBM and Loral?

3 A. So I seem to remember that about
4 the time that I left that Loral was acquired by
5 another defense contractor, called
6 Lockheed Martin. And that may have been done
7 just before I left or just after I left. I'm not
8 quite sure. But, again, I worked at the same
9 place, just that the sign on the -- at the
10 entrance of the parking lot and on the building
11 may have changed.

12 Q. So from 1983 to 1997, is it fair to
13 say you worked in one facility and just the name
14 over the door may have changed, depending on --

15 A. Not the -- not the whole time.
16 While I was going to law school, I worked at the
17 facility in Gaithersburg, Maryland. Prior to
18 that, I worked in Poughkeepsie, New York.

19 Q. And in your time as a -- well, I
20 guess, can we go back -- what other
21 responsibilities did you have as a staff
22 scientist?

1 A. So as I became more experienced, my
2 level of responsibility increased. So when I
3 first got there, I had responsibility for
4 designing and developing my own software. And as
5 time went on, I had the responsibility not only
6 to design and develop my own software, but also
7 to coordinate the -- the work of the people that
8 were in my group.

9 Q. When you designed the software,
10 were you designing the software from the
11 beginning or were you working on software that
12 others had already developed?

13 A. I designed and developed my own
14 software. It could have been tool that had
15 already existed, but the tool didn't have the
16 functionality that our clients wanted. So
17 although the tool may have existed, the
18 functionality that our clients desired did not
19 exist, and so I was involved in designing and
20 developing new functionality for it -- for -- to
21 satisfy our clients' needs and requirements.

22 Q. And I believe you mentioned that

1 you worked there while going to law school; is
2 that right?

3 A. Most of the time that I was going
4 to law school, I was working as an
5 engineer/software developer.

6 Q. And were you also working as an
7 engineer/software developer while going to
8 graduate school?

9 A. Yes, I went to graduate school
10 part-time also.

11 Q. When developing software --

12 A. Well, I should correct that.

13 Most of the time that I was in
14 graduate school, I was there part-time, so I
15 would work all day and then go to classes in the
16 evenings or late afternoons after work. But I
17 did receive two fellowships from IBM so that I
18 can complete the research for my Master's thesis
19 and for my doctoral dissertation.

20 So when I did my Master's thesis, I
21 remember that with this fellowship that I went to
22 Syracuse University and stayed there. I didn't

1 have to go to work at my office at Poughkeepsie.
2 Instead, I worked on my Master's thesis, the
3 research and the software development and the
4 writing of the thesis itself.

5 And, similarly, when I was working
6 on my dissertation, I received a fellowship to do
7 the dissertation at Syracuse University, so I
8 didn't have to work at my normal job while I was
9 working on my dissertation. So all of the
10 research and the software design and development
11 and the writing of the dissertation itself -- I
12 did that while I was at Syracuse University, and
13 I wasn't working at my regular job during that
14 point in time.

15 Q. When developing software, how did
16 you go about doing this?

17 A. So whenever you develop software,
18 you have to look at the requirements that the
19 client wants, and then you design a solution in
20 order to meet those requirements. And then after
21 you've designed the solution and then created a
22 structure of how the solution should exist -- and

1 there are various documents that need to be
2 repaired -- prepared in designing software. For
3 instance, one such document is referred to as a
4 "functional specification." It describes what
5 functions the software will have.

6 And then there are other documents,
7 design documents, that discuss how the software
8 is going to be structured in order to perform the
9 functions that are in the functional
10 specification. And -- and then you would
11 actually -- the final step is actually writing
12 the software itself. And after you've written
13 the software, you have to make sure that there's
14 configuration management procedure that's
15 involved, so you have to make sure that it
16 integrates with existing software.

17 And there's also extensive testing,
18 so there's test documents, test specifications
19 that need to be done on the software.

20 And so software design and
21 development involves a lot of different steps and
22 a lot of different documents.

1 Q. Do you ever look at the software of
2 others?

3 A. So the answer to that would be,
4 obviously, yes, because when you work on these
5 large software projects, you're not the only one
6 writing the software, so you have to interact
7 with a team of other software designers and
8 developers in order to develop the products.
9 So -- and the software that I wrote personally, I
10 had to interact with the software that was
11 written by others.

12 In addition, as I told you before,
13 as I gained experience working as a software
14 designer and developer, I was given the
15 responsibility to coordinate the activities of
16 other developers in my team, so I had to look at
17 what they had done also.

18 Q. When writing or developing your own
19 software, did you ever search for software that's
20 relevant to specific features to help you do
21 that?

22 A. So when you design software, there

1 are certain utilities or objects that are in a
2 library that you can make use of so that you
3 don't have to program very detailed requirements,
4 such as allocating memory, and things of that
5 nature. There are utilities that are called that
6 then interact with the operating system to give
7 you the resources that are needed by the program
8 that you're writing.

9 So if you have any application
10 software, the application software always
11 interacts with utilities to perform functions --

12 Q. Did you ever --

13 A. -- and it's -- it's associated with
14 software reuse so that others are also writing
15 software applications and they could use the same
16 utilities.

17 Q. What about software from others not
18 within your company?

19 A. So, clearly, when I was working for
20 projects on the Department of Defense that
21 required a top secret security clearance, I
22 wasn't looking at software written by people from

1 other companies, because all of the work I did
2 was confidential. And I believe in the -- but,
3 obviously, what I mentioned before, that all
4 application software uses utilities that come
5 with the software development package, so, for
6 instance, depending upon the operating system
7 that you're using, there's a software development
8 tool kit associated with that that performs some
9 of the mundane functions that need to be done in
10 order to get software to work properly so that
11 each application software developer doesn't have
12 to repeat all of that work.

13 Q. And would that be publicly
14 available software?

15 A. It's usually distributed with the
16 operating system.

17 Q. Did you ever look at publicly
18 available software when developing your own?

19 A. So when you say "look at," you
20 don't really look at the code of publicly
21 available software; you just look at what
22 functions it performs. And there are interface

1 documents associated with how you would use these
2 procedures or these objects, and then you would
3 use them in your own software.

4 Q. So when developing your own
5 software, you would look at other, at least,
6 descriptions of the functions in -- in similar
7 software?

8 A. Yeah, like every single software
9 developer does.

10 Q. Okay. And when you were choosing
11 which software you would look at or when you were
12 -- strike that question.

13 When developing your software,
14 did you restrict yourself to the exact problem
15 you were trying to solve?

16 A. So what software designers and
17 developers do is, they receive requirements from
18 the client and then they develop solutions, and
19 then they write code in order to implement those
20 solutions. So in a sense, you are restricted to
21 the requirements that the client gives; but the
22 client doesn't tell you how to implement

1 something, so it's up to your own skills and
2 experience in order to do that.

3 Q. So if we go back to the
4 second-to-last page of your CV, in 1997, then,
5 you became an associate at
6 Pennie & Edmonds/Jones Day, correct?

7 A. Okay. I became an associate at
8 Pennie & Edmonds. Many years later, Penny &
9 Edmonds merged with Jones Day, so it was one of
10 these deals where I went to work at the same
11 place but just the sign on the building changed.

12 Q. And you were working as an attorney
13 there, correct?

14 A. At Pennie & Edmonds initially.

15 Q. And were you focused on patent law?

16 A. Pennie & Edmonds was an
17 intellectual property law firm.

18 Q. Did you do -- was your focus there,
19 though, on patent law?

20 A. I think my primary focus while I
21 was working at Pennie & Edmonds was patent law.
22 They had other people doing trademarks. I,

1 typically, didn't get involved in those things.

2 Q. But you were not an engineer there,
3 correct?

4 A. You know, I see that patent
5 attorneys -- the way I look at it, patent
6 attorneys, at least the ones that get involved in
7 the substantive issues, are both attorneys and
8 engineers. I mean, you couldn't really do the
9 job if, for example, you didn't have technical
10 background.

11 So many of the cases that I worked
12 on and the patent applications that I wrote --
13 all of them involve technology. So in that
14 sense, I was working with technology, doing
15 engineering type of work while I worked as a
16 prosecutor.

17 Q. Okay. But your -- your title was
18 not engineer, correct?

19 A. Yeah. When people work at law
20 firms, they're not given the title of engineers.

21 Q. And were you doing any development
22 or writing of software in your work for

1 Pennie & Edmonds and Jones Day?

2 A. So during -- during the time I
3 worked at Jones Day and Pennie & Edmonds, I did
4 work on software projects, but that wasn't part
5 of -- that was on my own time. That wasn't part
6 of -- of my responsibilities at the law firm.

7 Q. What software projects were you
8 working on?

9 A. You know, I -- I don't think I can
10 remember all of the software projects that I
11 worked on over the years. I can recall some.

12 I can recall, for example, working
13 on scheduling of alarm system for a implantable
14 cardioverter device, which is called an ICD. And
15 these devices are implanted into the hearts of
16 people who are suffering from heart failure so
17 that if their heart stops beating, it will send
18 an electric shock to the heart in order to get it
19 to beeping again so they can live.

20 And I remember working on software
21 design and develop associated with alarms before
22 the shock was actually sent to the patient,

1 because when a patient gets shocked by an ICD,
2 it's the equivalent of getting kicked in the
3 chest by a mule. So it would be nice if an alarm
4 let the patient know what was coming before it
5 actually came. And so that's one of the projects
6 that I worked on.

7 I also remember working on a
8 project associated with a device -- I mean, an
9 application that would help patients to schedule
10 the taking of medicine. Because sometimes people
11 are really, really, sick and -- or they're old,
12 or a combination of the two, and so they may not
13 take their medication when they're supposed to.
14 And they may visit the doctor, and the doctor may
15 say, Oh, whatever medication we're prescribing
16 isn't working.

17 And so they may prescribe different
18 medication, for example. But really, the problem
19 isn't that the -- that the medications that the
20 doctor was prescribing were wrong; it just --
21 it's just the person was too old or too sick to
22 remember to take the medications that were

1 prescribed according to the scheduled time. And
2 so it would be nice if -- we thought it would be
3 nice if the patient and the doctor had a record
4 of when the patient took -- was scheduled to take
5 various medications and the medications that the
6 actual -- that the patients actually took.

7 So these are just examples of
8 various engineering/software design and
9 development projects that I've been involved in
10 over the years.

11 Q. After you left Jones Day, you went
12 to Jenner & Block, correct?

13 A. Yes, that's correct.

14 Q. And, again, you were working as a
15 patent attorney there?

16 A. My responsibilities while I was at
17 Jenner & Block involved patent law, patent
18 attorney.

19 Q. And then you went to the
20 Law Offices of Dr. Gregory J. Gonsalves; is that
21 right?

22 A. Yes. That was my own -- I was a

1 solo practitioner.

2 Q. And, again, were you focused on
3 patent law?

4 A. So for -- again, my answer is the
5 same as what I gave you earlier, is that during
6 that time, I also worked on engineering software
7 design projects, but my primary responsibility
8 for my clients while I was working as a solo
9 practitioner was for patent law.

10 Q. And then you went to the Patent
11 Trial and Appeal Board from -- it looks like
12 June 2010 until June of 2013; is that right?

13 A. Yes, that's correct.

14 Q. And you were an Administrative
15 Patent Judge there?

16 A. Correct.

17 Q. And you currently work for Wolf,
18 Greenfield & Sacks; is that right?

19 A. That's correct.

20 Q. And also as a patent attorney
21 still?

22 A. Yes.

1 Q. Are you being paid as an attorney
2 in this matter?

3 A. So I was asked to serve as the
4 expert on validity of the '983 patent for
5 IPR2024-00029, so that's what I'm doing in this
6 case, and that's what I'm being compensated for.

7 Q. Is your compensation the same
8 hourly rate as your firm charges for your legal
9 work?

10 A. I would have to go back and check
11 the documents to make sure I'm giving you an
12 accurate answer, but my -- from my memory, I
13 believe that the rate that the firm is charging
14 Agile Journeys for my work on this IPR is less
15 than my normal rate for contested matters.

16 Q. When you say "contested matters,"
17 do you mean when you are acting as counsel?

18 A. "Contested matters" is litigation,
19 IPRs, Federal Circuit appeals, those types of
20 things, as opposed to patent prosecution.

21 Q. And in those matters, you would
22 typically be counsel of record?

1 A. So I remember working on some
2 litigations where I may not have been listed as
3 counsel of record with the Court; I was just
4 assisting.

5 So -- and other -- other
6 litigations and Federal Circuit appeals that I've
7 worked on, I was listed as the -- as counsel of
8 record with the Court or -- so the answer is --
9 to your question is, Sometimes I'm listed with
10 the Court, and sometimes I'm not.

11 Q. Can we turn to Page 9 of
12 Exhibit 2009, your declaration in this
13 proceeding?

14 A. Sure.

15 Q. Do you see the heading that says
16 Level of Ordinary Skill in the Art?

17 A. Yes.

18 Q. Okay. And you list some factors
19 here that are used to determine what the level of
20 skill in the art can be; is that right?

21 A. So one thing I just noticed, that
22 the paragraph immediately below this -- above the

1 section that you're talking about, it says that
2 I'm being compensated for my time for expert
3 witness work at 755 an hour. And I know that's
4 less than what my norm -- what the firm charges
5 for my work on contested matters.

6 So getting back to your question
7 about the question of level of ordinary skill in
8 the art, I did list factors, citing case law,
9 that are typically considered in determining the
10 level of ordinary skill in the art.

11 I also should note that on
12 Paragraph 28, that in this case, the parties have
13 agreed to a definition of "a person having
14 ordinary skill in the art."

15 Q. Right. And in Paragraph 28, you
16 list that definition, correct?

17 A. Yes --

18 Q. And --

19 A. -- so this isn't a -- a definition
20 that I created. It was a definition that,
21 according to my understanding, the parties have
22 agreed to.

1 Q. Do you agree with this definition
2 of a "POSITA"?

3 A. No, I don't remember being asked to
4 determine whether I would agree with this or
5 whether I would come up with an alternate
6 definition. I just remember saying -- being told
7 that, hey, this is the definition of "a person
8 having ordinary skill in the art," so this is the
9 definition you should use in your work.

10 Q. And in -- in Paragraph 29, you
11 indicate that you believe you meet or exceed this
12 definition of a "POSITA"; is that correct?

13 A. Yes.

14 Q. If we look at the definition of
15 "POSITA," part of it indicates relevant practical
16 experience, right?

17 A. I notice at the bottom, one of the
18 factors is at least six years of practical
19 experience with analyzing, designing and
20 developing software for scheduling applications.

21 Q. And that same statement is included
22 in II, where it's at least two years of practical

1 experience in analyzing, designing and developing
2 software for scheduling applications, right?

3 A. I notice that under Item II, Roman
4 numeral II, it also says, in part, At least two
5 years of practical experience in analyzing,
6 designing and developing software for scheduling
7 applications.

8 Q. And we've just talked, you know, at
9 some length about your engineering experience.

10 Do you consider any of that
11 related to analyzing, designing and developing
12 software for scheduling applications?

13 A. Yeah, I think I explained to you
14 that I've worked on scheduling applications of --
15 throughout my career.

16 I think I mentioned, for example,
17 the work that I did on the air traffic control
18 system to schedule the flights of planes, and I
19 also mentioned my work on the satellite system to
20 schedule the operations of satellites.

21 Q. And your work on developing
22 integrated circuits in those scheduling

1 functions?

2 A. Yeah, I think I also mentioned that
3 also. In fact, I do remember that I mentioned
4 that -- that involves scheduling resources that
5 were needed to perform the function of
6 equivalence verification.

7 Q. And how is that experience relevant
8 to the '983 patent?

9 A. So the '983 patent is about
10 scheduling, and the -- the experience that I just
11 recited to you was also about scheduling.

12 Q. So if we can go back in your CV, I
13 think on the -- the third-to-last page, you list
14 some representative litigations, correct?

15 A. Okay. So -- sure.

16 So I -- on one page, yes, I see it,
17 some representative litigations that I've worked
18 on over the years.

19 Q. And on the page before that, you
20 have representative post-grant proceedings in
21 Federal Circuit appeals, correct?

22 A. That's correct.

1 Q. And that would include IPRs and, it
2 looks like, some covered business methods?

3 A. Yes, that's correct. I worked on
4 many, many IPRs and many, many appeals, so not
5 all of them are listed here. But some of them
6 are listed.

7 Q. Were you counsel for one of the
8 parties in all of these?

9 A. Yes.

10 Q. Were you an expert witness in any
11 of these?

12 A. So if you're a counsel in a
13 litigation or in IPR post-grant proceedings, you
14 can't also serve as -- as an expert witness. So
15 on these, I worked as counsel and not an expert
16 witness; on other cases, I worked as an expert
17 witness.

18 Q. And what cases were those?

19 A. So -- so on the preceding page, I
20 list some of the cases on which I worked as an
21 expert, those cases where I, in fact, testified
22 either at a deposition or at trial.

1 There were other cases where I
2 worked on as an expert witness, for instance, for
3 infringement and for validity, that are not
4 listed here because the case was settled before I
5 was deposed, before I needed to go to trial.

6 Q. So for these cases where you
7 testified, you didn't offer an expert opinion on
8 invalidity in any of them?

9 A. So on the cases where I testified,
10 your statement is correct.

11 On other cases where I worked as an
12 expert, it's not correct, because I was retained
13 for the technical issues of infringement and --
14 and validity on those cases.

15 Q. And did you submit any expert
16 declarations regarding infringement or invalidity
17 in those proceedings?

18 A. Yes.

19 Q. Were you deposed on those opinions
20 regarding invalidity or infringement?

21 A. So as I explained to you before, on
22 those cases, they were settled before we got to

1 my deposition or before I testified at trial. So
2 the answer is no, I wasn't deposed on those -- if
3 I -- if I had been deposed on them, I would have
4 listed them here, because I wanted to make sure
5 that I listed the cases on which I testified
6 either at deposition or trial, because that's
7 what you're supposed to do.

8 Q. So is this proceeding the first
9 time you've been deposed or offered testimony
10 from the perspective of a POSITA on the issue of
11 invalidity?

12 A. So I would say no when you're
13 saying -- because you said "deposed or offered
14 testimony." I actually offered testimony in
15 these other cases on infringement and validity,
16 but I wasn't deposed on it.

17 The testimony that I offered was in
18 the form of a declaration.

19 Q. So have you ever had your testimony
20 excluded for any reason, that you're aware of?

21 A. So -- so whenever you submit a -- a
22 declaration in a case involving inequitable

1 conduct, the court will sometimes constrain what
2 the expert is permitted to talk about. And so --
3 at trial.

4 So I remember receiving some
5 constraints on what I was permitted to talk about
6 at trial. And I can give you some examples for
7 -- so experts in -- for inequitable conduct, as
8 you know, one of the prongs is intent to deceive.
9 And an expert is not supposed to opine on
10 the patent applicant's state of mind.

11 And so I remember receiving
12 constraints, as the expert on the other side did,
13 about what I could talk about and what I couldn't
14 talk about at the trial.

15 Q. And would one example of that be in
16 one -- I think the first case you list here,
17 Applied Capital versus The ADT Corporation?

18 A. So I notice here that the Applied
19 Capital case was in 2020. So I remember
20 receiving constraints, as the expert witness on
21 the other side did, about what I could and could
22 not talk about at trial with respect to

1 inequitable conduct, but I'm not quite sure if it
2 was that case or not because it was a while ago.

3 ATTORNEY HUGHES: I'd like to mark
4 as Exhibit 1. This is an order and
5 opinion from the Applied Capital versus
6 ADT Corporation case.

7 THE WITNESS: Okay. Well, I think
8 -- you want to mark this -- so we talked
9 about this --

10 CERTIFIED STENOGRAPHER: Hold on a
11 second.

12 THE WITNESS: -- it's probably
13 easier to mark it with the next
14 sequential number in the 1000 sequence --

15 BY ATTORNEY HUGHES:

16 Q. We'll mark this as Exhibit 1 --
17 (Simultaneous unreportable
18 crosstalking.)

19 A. -- you can remark it later.

20 Q. -- and then we'll decide what we
21 want to do with it later.

22 CERTIFIED STENOGRAPHER: All

1 right. Gentlemen, hold on.

2 --oOo--

3 (Gonsalves Deposition Exhibit
4 Number 1, Memorandum and Order,
5 marked for identification, as of
6 this date.)

7 --oOo--

8 THE WITNESS: Okay. I have -- I
9 have the document in front of me.

10 BY ATTORNEY HUGHES:

11 Q. And do you recognize this as the
12 case where you offered expert testimony that's
13 listed in your CV?

14 A. Yes, this is one of the cases where
15 I offered expert testimony on -- I believe it was
16 inequitable conduct.

17 Q. And if you go to Page 8 of this
18 memorandum and order, do you see in the left-hand
19 column, there's a heading for 2,
20 Dr. Gregory Gonsalves?

21 And Page 8 of the document, not
22 the -- not the pincites within it.

1 A. Okay. I see a section on Page 8 of
2 the document you just handed to me.

3 Q. And do you see in this document, it
4 says that there was an argument that you were not
5 qualified in the testimony with respect to
6 materiality as duplicative of the opinions of
7 Applied Capital's validity expert, Dr. Zheng?

8 A. So that's -- that was the
9 contention from ADT, which was the opposing party
10 in this case.

11 Q. And in the next paragraph, you see
12 the court agreed with ADT that testimony that
13 invades the private -- province of the
14 fact-finder is not appropriate?

15 A. And then the next sentence says,
16 However, because that issue will be tried to the
17 Court, ADT's arguments have less force.

18 I do see that.

19 Q. And in the next paragraph, this is
20 an example of where a court has limited or
21 precluded what your testimony could be; is that
22 right?

1 A. You're saying the paragraph
2 subsequent to the one we were just discussing?

3 Q. Yes.

4 A. So just give me a moment so I can
5 read it, please.

6 (Whereupon, the witness reviews the
7 material provided.)

8 THE WITNESS: So I see here in
9 this paragraph, it -- it mentions, among
10 other things, that Some of Dr. Gonsalves'
11 testimony may be -- may appropriately
12 present -- be presented to the jury, an
13 explanation of patent rules, procedure
14 and terminology, testimony about
15 the patents and evidence related to
16 prosecution history may be relevant,
17 reliable and helpful to the jury.

18 And then it goes on from there.

19 BY ATTORNEY HUGHES:

20 Q. And it goes on to say that while
21 that evidence may be tangentially relevant to the
22 issues of materiality and/or intent,

1 Dr. Gonsalves will not be permitted to testify as
2 to his purported conclusions with -- with respect
3 to those topics.

4 Right?

5 A. The paragraph does -- does include
6 the statement that you just read. It also
7 indicates later on that A cautionary instruction
8 may be in order with respect to any evidence
9 presented to the jury, but the Court cannot
10 determine the parameters of any such instruction
11 at this time.

12 And then it says, The parties
13 should approach the bench in advance of any
14 evidence that touches on the inequitable conduct
15 issue.

16 So what I believe the judge is
17 doing here is saying, Yeah, I'm going to defer my
18 ruling on this issue until it actually -- any
19 issue arises at trial.

20 Q. And the sentence right before the
21 one you just read states that Dr. Gonsalves was
22 not designated to offer opinions on invalidity or

1 infringement, nor does he appear qualified to do
2 so.

3 Right?

4 A. So that sentence is accurate. I
5 wasn't -- there was another expert that offered
6 opinions on invalidity or infringement. So on
7 this particular case, that wasn't my job.

8 On other cases that I mentioned, it
9 was my job on expert -- as an expert witness to
10 testify about validity and infringement.

11 ATTORNEY HUGHES: I see we've been
12 going for about an hour, 20 minutes.

13 Would now be a good time for a
14 break?

15 ATTORNEY KESAN: Sure.

16 ATTORNEY HUGHES: Can we go off
17 the record?

18 THE VIDEOGRAPHER: We're going off
19 the record. And the time is 11:20 a.m.

20 --oOo--

21 (Whereupon, a recess was taken from
22 11:20 a.m. EDT to 11:36 a.m. EDT.)

THE VIDEOGRAPHER: We're back on the record. And the time is 11:36 a.m.

You may begin.

BY ATTORNEY HUGHES:

Q. Now, you recall we mentioned that this IPR -- IPR is about the '983 patent, right?

A. Yes.

Q. Are you familiar with the '983 patent?

A. Yes.

Q. Have you read it in its entirety?

A. Yes.

Q. When's the last time you read the '983 patent?

A. Over the last three days, I've reviewed the documents in this case, which include the '983 patent itself.

Q. So I'm going to hand you a copy of what is Exhibit 1001 in this proceeding. This is a copy of the '983 patent.

(Deposition Exhibit Number 1001

1 referred to herein.)

2 ATTORNEY HUGHES: Counsel, would
3 you like a copy?

4 ATTORNEY KESAN: I've got it
5 online here, so I'm good.

6 ATTORNEY HUGHES: Okay.

7 ATTORNEY KESAN: As long as you
8 refer to column, lines, and all that good
9 stuff.

10 ATTORNEY HUGHES: Yes. And if you
11 have a question, just let me know.

12 BY ATTORNEY HUGHES:

13 Q. Okay. So the '983 patent describes
14 a system and method for creating and presenting
15 itineraries to a user.

16 Is that fair?

17 A. Yeah. I noticed on the Abstract
18 the very first sentence says, A method is
19 disclosed for creating itineraries for a party of
20 visitors to a facility, the facility having
21 multiple attractions.

22 Q. And what is an itinerary, as

1 described in the '983 patent?

2 A. So, for instance -- for instance,
3 if you look at Claim 1 of the '983 patent, at the
4 very beginning, it mentions a system for
5 providing an itinerary to a party, said itinerary
6 comprising a second set of attractions selected
7 from a first set of attractions.

8 And later on, it mentions that the
9 itinerary is customized for said party.

10 So according to this claim, the
11 itinerary comprises a second set of -- of
12 attractions, and the second set of attractions
13 that's in the itinerary is selected from the
14 first set of attractions.

15 Q. And can you turn to Column 7,
16 around Line 31 of the '983 patent, please?

17 A. Yes. I'm there.

18 Q. And do you see where the '983
19 patent states that An itinerary is comprised of
20 events?

21 A. I see that sentence.

22 Q. And it indicates that an event is

1 typically a visit to an attraction at a scheduled
2 time?

3 A. That's the sentence -- that's also
4 a sentence in the -- in this paragraph, starting
5 at Line 31 of Column 7.

6 Q. And the '983 patent also states
7 that This is not necessarily a reservation,
8 though it can be. It is a time at which the
9 party is recommended to visit an attraction.

10 Is that right?

11 A. Yeah. You read both of those
12 statements correctly.

13 Q. So according to the '983 patent, an
14 event for an itinerary is not equivalent to a
15 reservation, right?

16 A. So the sentence says that An
17 itinerary is -- that an event is typically a
18 visit to an attraction at a scheduled time.

19 And then it says, This is not
20 necessarily a reservation, though it can be.

21 Q. So it doesn't have to be a
22 reservation; is that right?

1 A. It says, This is not necessarily a
2 reservation, though it can be.

3 Q. So is that a yes? It doesn't have
4 to be a reservation?

5 A. I think so, because it says -- the
6 statement is This is not necessarily a
7 reservation, though it can be.

8 So it could be a reservation, or
9 the implication from this sentence is that it's
10 not necessarily a reservation.

11 Q. And from the last sentence in that
12 section we were looking at, it just has to be a
13 recommendation to visit an attraction; is that
14 right?

15 A. The last sentence states, It is a
16 time at which the party is recommended to visit
17 an attraction.

18 Q. So an event for an itinerary can be
19 a recommendation of an attraction and a time; is
20 that right?

21 A. An event, according to this
22 paragraph, is a time at which the party is

1 recommended to visit an attraction.

2 Q. So if something presented a
3 recommended attraction and a time for a user,
4 that would be an event for an itinerary, right?

5 (Whereupon, the witness reviews the
6 material provided.)

7 ATTORNEY KESAN: Counsel, you're
8 still referring to that same Column 7,
9 Lines 31 to 34, right?

10 ATTORNEY HUGHES: That's correct.

11 ATTORNEY KESAN: Okay.

12 THE WITNESS: Well, the sentence
13 in the specification says, An event is
14 typically a visit to an attraction at a
15 scheduled time.

16 This particular paragraph doesn't
17 mention anything about a user, which I
18 think was in your question.

19 BY ATTORNEY HUGHES:

20 Q. So if I rephrase, if a recommended
21 attraction and time is presented to a party, that
22 would be an event for an itinerary, correct?

1 A. The last sentence of this paragraph
2 that we were reading says, It is a time at which
3 the party is recommended to visit an attraction.

4 Q. So that would be an event even if
5 no reservation is made?

6 A. So the same paragraph in the
7 preceding sentence says, This is not necessarily
8 a reservation, though it can be.

9 Q. So the patent indicates that you
10 can have an itinerary without a reservation,
11 correct?

12 A. This portion of the patent that
13 we've been discussing indicates that An itinerary
14 is comprised of events. An event is typically a
15 visit to an attraction at a scheduled time.

16 And it says, This is not
17 necessarily a reservation, though it can be. It
18 is a time at which the party is recommended to
19 visit an attraction.

20 Q. So, again, if a party is presented
21 with an attraction and a recommended time, that
22 would be an itinerary event, correct?

1 A. So I don't see the phrase "a party
2 is presented," but it does say that an event --
3 it seems like this paragraph is talking about
4 itineraries and events. It says, An itinerary is
5 comprised of events, and an event is typically a
6 visit to an attraction at a scheduled time, not
7 necessarily a reservation, though it can be. It
8 is a time at which the party is recommended to
9 visit an attraction.

10 Q. And so with the itinerary being
11 events where -- that are times a party is
12 recommended to visit an attraction, a user could
13 accept or -- or decline that, correct?

14 A. So this particular paragraph that
15 we've been discussing indicates that An itinerary
16 is comprised of events. It is a time at which
17 the party is recommended to visit an attraction,
18 but it doesn't talk about accepting or declining
19 events in an itinerary.

20 Q. So in the '983 patent, is it your
21 opinion that when a user is given an itinerary,
22 they can accept or decline it?

1 A. So I know the paragraph that we've
2 just been discussing doesn't mention that. I
3 don't recall reading another paragraph in the
4 patent that indicates exactly what you just said.

5 Q. If the party is presented with
6 recommended attractions and times but declines to
7 make a reservation for them that would still have
8 been an itinerary, correct?

9 A. So according to the -- to the
10 claim, an itinerary comprises a second set of
11 attractions selected from a first set of
12 attractions. And it also said the itinerary is
13 customized for said party.

14 And according to the paragraph that
15 we were just looking at, it indicates that
16 itinerary is comprised of events and that an
17 event is typically a visit to an attraction at a
18 scheduled time; and this is not necessarily a
19 reservation, though it can be.

20 Q. So my -- my question was: If a
21 party is given recommended attractions and times
22 but declines to make a reservation, that would

1 still have been an itinerary, correct?

2 A. Well, I don't think what you just
3 said is the definition of an "itinerary" that's
4 given in the claims, or the specification of the
5 '983 patent, at least the portions that we were
6 just talking about.

7 Q. So if we look at Claim 1, for
8 example.

9 A. Sure.

10 Q. Claim 1 has a limitation of a
11 "presentation" means in communication with said
12 computer; said presentation means able to receive
13 said itinerary from said computer and present
14 said itinerary to said party.

15 Do you see that?

16 A. Yeah, I do see that.

17 Q. Now, Claim 1 does not mention any
18 reservation, does it?

19 A. So I just looked at Claim 1 and I
20 did not see the term "reservation" in Claim 1.

21 Q. So in Claim 1, when the user is
22 presented with an itinerary, we saw earlier that

1 the patent described that as being recommended
2 attractions and times, correct?

3 A. So according to the claim itself,
4 an itinerary comprises a second set of
5 attractions selected from a first set of
6 attractions, and the itinerary is customized for
7 said party.

8 And according to the paragraph that
9 we were discussing in the specification, it says,
10 An itinerary is comprised of events. An event is
11 typically a visit to an attraction at a scheduled
12 time. This is not necessarily a reservation,
13 though it -- it can be.

14 Q. So if we can stay in Claim 1, do
15 you see where the claim recites, a computer
16 having access to said data and said information?

17 A. I see that phrase in the claim.

18 Q. And the claim goes on to say that
19 The computer having software that selects said
20 second set of attractions from said first set of
21 attractions.

22 Correct?

1 A. I also see that, too.

2 Q. The claim states that The software
3 selects the attractions.

4 Right?

5 A. The claim states that The software
6 selects said second set of attractions from said
7 first set of attractions.

8 Q. The claim doesn't have anything
9 about the computer or software selecting times
10 for the attractions, does it?

11 A. So to answer your question, as I'm
12 looking at Claim 1, I don't see the term "time."
13 I do, however, note that it mentions an itinerary
14 comprising a second set of attractions, and that
15 the paragraph that we were just discussing at
16 Column 7 indicates, An itinerary is comprised of
17 events, an event is typically a visit to an
18 attraction at a scheduled time.

19 So the claim does use the term
20 "itinerary," and Column 7 mentions the itinerary
21 as comprised of events and that an event is
22 typically a visit to an attraction at a scheduled

1 time.

2 Q. With respect to the selecting in
3 the claim, though, the claim only specifies the
4 software selects said second set of attractions,
5 right?

6 A. So the claim says that the software
7 selects said second set of attractions from said
8 first set of attractions. The claim also says
9 that An itinerary comprises a second set of
10 attractions.

11 And then Column 7, which we were
12 just discussing, mentions that An itinerary is
13 comprised of events; an event is typically a
14 visit to an attraction at a scheduled time.

15 Q. And so when we look at the claim
16 with respect to selecting, considering that --
17 you know, that -- what you just read from the
18 specification, it mentions selecting the
19 attractions in that piece, correct?

20 A. So it mentions -- the claim --
21 Claim 1 mentions software that selects a second
22 set of attractions. It also mentions that the

1 itinerary comprises this same second set of
2 attractions.

3 Q. The claim doesn't say that the
4 software selects the entire itinerary, does it?

5 A. So what the claim does say is that
6 The software selects said set of attractions; the
7 claim also says that the itinerary comprises this
8 very same second set of attractions.

9 And the specification, when talking
10 about the itinerary, indicates that it's
11 comprised of event, and an event is typically a
12 visit to an attraction at a scheduled time.

13 Q. And if we can just stay in the
14 claim language on this, though, my -- my question
15 is, On the selection, the claim says only that
16 the software selects said second set of
17 attractions, right?

18 A. So one thing I should point out is
19 that it's a fundamental concept of patent law
20 that claims should be construed in accordance
21 with the specification. And so it does mention
22 that software selects a second set of

1 attractions. The second set of attractions is
2 part of the itinerary.

3 And the specification at Column 7
4 indicates the itinerary is comprised of events,
5 and an event is typically a visit to an
6 attraction at a scheduled time.

7 Q. The claim doesn't say the software
8 selects events, does it?

9 A. The claim says that the software
10 selects second set of attractions. The claim
11 also says that itinerary comprises a second set
12 of attractions. And the specification indicates
13 an itinerary is comprised of events and that an
14 event is typically a visit to an attraction at a
15 scheduled time.

16 Q. So that's a no, the claim does not
17 say the software selects events?

18 A. So I guess I can answer that
19 question in two parts. I can also just remind
20 you that claims are supposed to be construed in
21 accordance with the specification.

22 The claim -- I don't believe -- I

1 don't see the term "event" in Claim 1 itself. I
2 do see that it says that the software selects the
3 second set of attractions and that the itinerary
4 comprises a second set of attractions, and that
5 the specification indicates the itinerary is
6 comprised of events and that an event is
7 typically a visit to an attraction at a scheduled
8 time.

9 So it's talking about a relation
10 between attractions and events and itineraries.

11 Q. So in that answer, you were mixing
12 language from the claims and the specification;
13 is that right?

14 A. So I don't know if I was, what you
15 say, mixing language. I think I mentioned that
16 claims should be construed in accordance with the
17 specification. And I was referring to terms that
18 were in the claims.

19 And the same terms, like
20 "itinerary" and "attraction," are in the
21 paragraph in Column 7 at Line 31 that we were
22 just talking about.

1 Q. So in Claim 1 -- to confirm,
2 though, the term "event" is not found in Claim 1;
3 is that right?

4 A. So I don't see the term "event" in
5 Claim 1. I do see that The software selects a
6 second set of attractions, and I do see The
7 itinerary comprises a second set of attractions.
8 That's all in the claim.

9 And I also see in the specification
10 that an itinerary is comprised of events.

11 So it's describing relation between
12 attractions, itineraries and events.

13 Q. And if we look at Claim 3, which
14 also has -- if you look at Claim 3.c) -- this is
15 in Column 32 of the '983 patent -- there's a
16 computer there as well, correct?

17 ATTORNEY KESAN: Could you give me
18 that cite again?

19 ATTORNEY HUGHES: Claim 3 of the
20 '983 patent.

21 ATTORNEY KESAN: Oh, Claim 3.
22 Okay. Got it.

1 BY ATTORNEY HUGHES:

2 Q. And this is Element C in Claim 3 --

3 ATTORNEY KESAN: Got it.

4 BY ATTORNEY HUGHES:

5 Q. -- do you see that?

6 A. I see Element C in Claim 3, yes.

7 Q. And this, similarly, says that the
8 computer having software that selects said second
9 set of attractions from said first set of
10 attractions, right?

11 A. So in 3.c), it does say what you
12 just -- the phrase you just read is accurate. In
13 the preamble, it says that the itinerary
14 comprises a second set of attractions.

15 Q. And, again, can you take a look at
16 Claim 3 and let me know if you see the term
17 "event" in the claim?

18 A. So, you know, my answer is similar
19 to what I gave you before, that claims are always
20 interpreted in accordance with the specification
21 and that Claim 3 recites that the software
22 selects its second set of attractions from said

1 first set of attractions; it also uses the term
2 "itinerary" and indicates itinerary comprises a
3 second set of attractions; and that the
4 specification, at Column 7, indicates that
5 itinerary is comprised of events. An event is
6 typically a visit to an attraction at a scheduled
7 time.

8 So there's a similar relationship
9 in Claim 3 to attractions, itinerary and event as
10 there are -- as there is in Claim 1.

11 Q. So should the claims be read to
12 require everything that's in the specification?

13 A. That, I didn't say. What I did say
14 is that claims should be construed in light of
15 the specification.

16 Q. So my question, though, simply yes
17 or no, is, Do you see the term "event" in
18 Claim 3?

19 A. So the term "event" is not in
20 Claim 3. The term "itinerary" is. So is term
21 "attractions" and "itinerary". And "itinerary"
22 and "attractions" are explained in Column 7, Line

1 31.

2 Q. And Claim 3, like Claim 1, says
3 only that the software selects the second set of
4 attractions, right?

5 A. So Claims 3 and Claim 1 say a lot
6 of things other than what you just read. One of
7 the things it says is that the software selects
8 its set of attractions.

9 Q. Does it recite specifically that
10 the software selects anything else?

11 A. You're referring to Claim 3 or
12 Claim 1?

13 Q. We'll start with Claim 3.

14 A. Okay. So I see here that it says
15 that the software selects said second set of
16 attractions from said first set of attractions.

17 I also see on Element 3 d),
18 selecting said second set of attractions with
19 said software, so that -- such that said second
20 set of attractions comprises at least one of said
21 first set of attractions for which said data
22 substantially matches with said information.

1 Q. And there's no other selecting
2 steps in the claim, correct?

3 A. So there's at least one other use
4 of the root term "select" in Claim 3, at the
5 beginning of Claim 3, reading as follows: A
6 method of providing an itinerary to a party, said
7 itinerary comprising a second set of attractions
8 selected from a first set of attractions.

9 So I think there are three
10 instances of the term "select" or some variant of
11 the term "select" in Claim 3.

12 Q. And those are the only three in the
13 preamble 3.c) and 3d.)?

14 A. Okay.

15 So I want to make sure I give an
16 accurate answer, so -- so I'm just reviewing the
17 Claim 3 again.

18 So I see in the second line of
19 Claim 3, there's an instance of -- of a variant
20 that the term "select." I see in Element 3.c)
21 there's a variant of the term "select," in
22 particular, says "selects" with an "S" at the

1 end.

2 And, also, in 3d), I see a variant
3 of the term "select." In this case, it's
4 "selecting" at the very beginning of 3d).

5 Q. And can you turn to Claim 8 of the
6 '983 patent?

7 This is in Column 33.

8 A. I'm on Claim 8.

9 Q. And Claim 8 is -- or states the
10 method of Claim 3, correct?

11 A. It does say that at the beginning
12 of Claim 8.

13 Q. And you understand that that means
14 Claim 8 depends from Claim 3?

15 A. Yes.

16 Q. And Claim 8 indicates that the data
17 about the attractions can comprise a scheduled
18 time corresponding to a first attraction of said
19 second set of attractions; is that right?

20 A. So I see here that Claim 8 recites,
21 wherein said data further comprises a scheduled
22 time corresponding to a first attraction of said

1 second set of attractions.

2 So it appears to be referring to a
3 scheduled time of a particular attraction that's
4 in the second set of attractions.

5 Q. And following that, it says --
6 Claim 8 says that Wherein in Step d), said
7 software adds said scheduled time in association
8 with said first attraction to said itinerary?

9 Do you see that?

10 A. Right.

11 And you -- you read that portion of
12 Claim 8 correctly. And I also note that Step d)
13 is in Claim 3 from which Claim 8 depends.

14 Q. And this indicates that the
15 software adds a time, correct?

16 A. Well, it indicates, more
17 specifically, that the software adds said
18 scheduled time in association with said first
19 attraction to said itinerary.

20 Q. This claim doesn't say where that
21 scheduled time comes from, does it?

22 A. Well, I think the phrase that we

1 just read indicates that the software adds the
2 scheduled time.

3 Q. So, again, it says, "adds" the
4 time; it does not say "selects" the time,
5 correct?

6 A. So I'm looking at Claim 8, and the
7 particular phrase that we were looking at
8 says -- indicates as follows: Said software adds
9 said scheduled time in association with said
10 first attraction to said itinerary.

11 So it's talking about adding a
12 scheduled time of a particular attraction, which
13 -- what it -- what it refers to is the first
14 attraction. And earlier in the claim, it
15 indicates that the first attraction is of said
16 second set of attractions. So that, to me, means
17 that the first attraction is in the second set of
18 attractions.

19 Q. Okay. Do you still have a copy of
20 your declaration in front of you?

21 A. Yes, I do.

22 Q. If you can go to Page 67 of your

1 declaration.

2 A. There's not a lot of real estate on
3 the table available, so I'm juggling my exhibits
4 here.

5 So you had said Page 67, correct?

6 Yes.

7 (Whereupon, the witness reviews the
8 material provided.)

9 BY ATTORNEY HUGHES:

10 Q. Let me know when you're there.

11 A. Yeah, I see that's -- Page 67
12 begins with Paragraph 88 and Paragraph 88 -- and
13 this section, Substantially Matches, includes
14 Paragraph 88; and then it continues with
15 Paragraph 89, Paragraph 90. It goes on for a few
16 pages, this particular section. And then it ends
17 at Page 72.

18 Q. So in this -- in this section,
19 you're discussing the term "substantially
20 matches" from the claims; is that correct?

21 A. Yes, I believe that's correct,
22 because in Claim 1, for example, it indicates the

1 phrase "for which said data substantially matches
2 with said information."

3 Q. And if you look at Claim 3d), we
4 see that same limitation, "for which said data
5 substantially matches with said information."

6 Right?

7 A. So Claim 3, Element D recites "said
8 data substantially matches with said
9 information."

10 Earlier in the claim, it mentions
11 "gathering information about said party." So
12 that's the information that it refers to in the
13 phrase "substantially matches with said
14 information."

15 Q. And you would agree this limitation
16 is the same in Claims 1 and 3, correct?

17 A. So Claim 1 and Claim 3 both have
18 the phrase "for which said data substantially
19 matches with said information," so that -- those
20 portions of Claim 3 are the same -- there are --
21 as Claim 1. There are other portions of Claim 1
22 and 3 that differ. For instance, Claim 1 is a

1 system claim -- you can see the first two words
2 -- while Claim 3 is a method claim.

3 Q. In Paragraph 88 of your
4 declaration, you're quoting from the Board's
5 institution decision in this matter; is that
6 right?

7 A. So Paragraph 88 starts off as
8 saying, The Board, in its institution decision,
9 states. And then after the colon, after that
10 phrase, it includes a couple of paragraphs. So
11 based upon what I read here, these paragraphs
12 appeared in the -- in the Board's institution
13 decision. So I'm restating what the Board said
14 in its institution decision in Paragraph 88.

15 In fact, there's a cite at the end,
16 Paper 7, which I believe is the institution
17 decision, Page 21.

18 Q. And do you see the first paragraph
19 on Page 68, which is the last part of the Board's
20 decision that you're quoting here?

21 This says, Claims 1 and 3 do
22 not recite that the data must only substantially

1 match such that an exact match is excluded.

2 There is no specific definition of what would be
3 considered substantial, nor is there an exclusion
4 of an exact match that, by its nature, is also a
5 substantial match.

6 A. Well, I can confirm that you did
7 read that paragraph correctly. And I can also
8 say that I'm referring to an institution
9 decision, which is different than a final written
10 decision by the Board, so the Board hasn't reach
11 a final conclusion on how to interpret this
12 particular claim limitation.

13 Q. All right. Now, in Paragraph 89,
14 though, you state it's your opinion that the
15 Board erred and it states that there is no
16 specific definition of what would be considered
17 substantial, nor is there an exclusion of an
18 exact match that, by its nature, is also
19 substantial.

20 Do you see that?

21 A. Yes, I do see that.

22 Q. So you disagree that an exact match

1 can be a substantial match?

2 A. I disagree with the Board's
3 statements in its institution decision.

4 Q. Do you disagree that an exact match
5 can be a substantial match?

6 A. Yes.

7 Q. So if something is an exact match,
8 you don't consider that to be substantial?

9 A. So, you know, your question is very
10 general, referring to "substantial match" and
11 "exact match" without any context. And so what I
12 was asked to do in this proceeding, as an expert
13 witness on invalidity, is to -- portion of what I
14 was asked to do was to interpret the claims of
15 the -- of the patents. And so within the context
16 of this particular patent, in light of -- and
17 claims should be construed in accordance with the
18 specification -- in light of the specification,
19 so in accordance with this particular patent, the
20 intrinsic evidence of this particular patent,
21 "substantially matches" would be different than
22 "exact match."

1 Q. Can an exact match be a substantial
2 match?

3 A. So, again, your question is very
4 general. I wasn't asked to give definitions of
5 -- I was only asked to give definitions of what
6 an exact match is and what a substantial match is
7 in the context of -- of the '983 patent.

8 So in accordance with the '983
9 patent, I disagree with the Board's, at least,
10 intermediate decision -- it's not a final
11 decision -- where it says, There is no specific
12 definition of what would be considered
13 substantial, nor is there an exclusion of an
14 exact match that, by its nature, is also a
15 substantial match.

16 So I disagree with the intermediate
17 decision, which is not a final decision, that's
18 in the institution decision that was created by
19 the Board.

20 Q. And in -- in Paragraph 89, where
21 you are discussing the specification, there's
22 some kind of subbullets in your -- in your

1 declaration following -- or within that
2 paragraph.

3 Do you see that?

4 A. Yeah, I see some bulleted points in
5 Paragraph 89.

6 Q. And the first bulleted point says,
7 Substantially matches excludes a poor/low match,
8 which violates some clearly identified party
9 preferences.

10 Do you see that?

11 A. Yes. That's in there.

12 Q. That's not discussing an exact
13 match, is it?

14 A. Well, it's -- it's discussing how
15 the term "substantially matches" should be
16 construed in light of the specification, so it's
17 talking about what the proper substantial
18 -- it's -- it's providing evidence as to what the
19 proper construction of "substantially matches"
20 should be.

21 Q. Would you consider an exact match
22 to be a poor match?

1 A. No.

2 Q. Would you consider an exact match
3 to be a low match?

4 A. Let me just check something here.

5 So I noticed that this paragraph in
6 my declaration refers to Column 6, Lines 50 to 53
7 of the '983 patent. And so that sentence at that
8 particular location says that A historic
9 recreation of the gunfight at the O.K. Corral
10 might be rated low, that is, as a poor match, for
11 parties with an aversion to violence.

12 So a poor match, or a match that's
13 rated low, for the particular party that has an
14 aversion to violence would not be an exact match,
15 far from it.

16 Q. And the next bullet point in
17 Paragraph 68 [sic] of your declaration, you
18 mention that "substantially matches" excludes an
19 alluring -- sorry -- excludes an unalluring
20 (i.e., neutral) match.

21 Do you see that?

22 A. I see that phrase in Paragraph 89

1 of my declaration.

2 Q. Would you consider an exact match
3 to be unalluring?

4 A. No, an exact match would not be an
5 unalluring match.

6 Q. And then the third bullet point --
7 this is on Page 69 now. So the third
8 bullet point of Paragraph 88 of your declaration
9 indicates that substantially matches are matches
10 more alluring than an unalluring match and have
11 nothing strictly objectionable.

12 Do you see that?

13 A. Yeah.

14 And I should just mention, when
15 we're talking about the term "unalluring" in the
16 preceding bullet, it says, An unalluring match
17 represents everything that is neither a
18 substantial match nor a poor match (i.e., no dash
19 marks that are not nullified (by a zero) and have
20 nothing in its favor (no positive, no plus sign
21 which represents a positive response mark), or as
22 a policy not enough in its favor, not enough plus

1 markers, which refers to the '983 patent at
2 Column 28, Lines 35 to 37.

3 So that describes what an
4 unalluring match is. And the bullet point that
5 you just mentioned immediately following that
6 indicates that substantial matches are matches
7 more alluring than an unalluring match and have
8 nothing strictly objectionable (i.e., is not a
9 poor/low match).

10 Q. And that goes on to say that
11 Attraction data substantially matches party
12 information when the party profile matches at
13 least one, but potentially more, attraction
14 acceptance factors having a positive response.

15 Do you see that?

16 A. Yeah, you read that correctly.

17 Q. So for attraction data to
18 substantially match, there could be a matching of
19 one attraction acceptance factor?

20 A. So according to this portion of
21 the patent, at Line 57 -- and I should point out
22 that there are multiple locations in the patent

1 which discuss "substantially match" or which
2 relate to "substantially match," but this
3 particular portion reads as follows: For
4 instance, if visitors to a movie studio indicate
5 an affinity to the theme "How Movies are Made,"
6 attractions which emphasize that theme, other
7 things being equal, are rated more highly than
8 attractions which do not.

9 Q. So in that sub-bullet where you
10 say, Attraction data substantially matches party
11 information when the party profile matches at
12 least one acceptance factor -- that indicates
13 that you can have a substantial match based on
14 one factor; is that right?

15 A. I don't think that's exactly what
16 it says.

17 The entire paragraph says that
18 Substantial -- substantially matches are matches
19 more alluring than an alluring match and have
20 nothing strictly objectionable (i.e., is not a
21 poor/low match). Attraction data substantially
22 matches party information when the party profile

1 matches at least one but potentially more
2 attraction acceptance factors having a positive
3 response.

4 So in this particular bullet point
5 -- I mean, there are many bullet points which
6 talk about the meaning of the claim term
7 "substantially matches," but in this particular
8 one, that's what it mentions.

9 Q. And you reference Figure 12 here.
10 And if we can look at Figure 12.

11 Let me know when you see that.
12 On the left-hand side, we have
13 Profile Elements.

14 Do you see that?

15 A. I see on Figure 12 the column on
16 the left is titled Profile Elements.

17 Q. And one of those elements is Large
18 Group?

19 A. Yeah, it says Large Group and, in
20 parentheses, greater than 5.

21 Q. Then, for example, the next two
22 are, Have small children or have infant.

1 Right?

2 A. Yes, I see that.

3 Q. And under the Acceptance Factor,
4 for example, some of them can be Height Limit or
5 Kid Entertainment.

6 Correct?

7 A. So on the column that says
8 Acceptance Factors, I see that there's an
9 entry -- well, in that group of columns that's
10 identified as Acceptance Factors, I see
11 particular column -- one particular column being
12 Height Limit identified by Reference Number 1245,
13 and I see another column identified by Reference
14 Number 1244 that says Kid Entertainment.

15 Q. If there was an exact match between
16 an acceptance factor and a profile element, would
17 that be more alluring than an unalluring match?

18 A. So I see here, what I have in my
19 declaration, it's talking been An unalluring
20 match represents everything that is neither a
21 substantial match, nor a pure -- poor match. It
22 means there's no dash marks that are nullified

1 (by zero) and has nothing in its favor (no
2 positive -- no plus sign positive response marks
3 -- marks) or, as a matter of policy, not enough
4 in its favor (e.g., not enough plus markers).

5 So that's -- and it refers to
6 Column 28, Lines 35 to 36 of the patents.

7 Q. So I understand that now, if
8 there's an exact match between an acceptance
9 factor and a profile element, would that be a
10 substantial match?

11 A. So I think what I've described here
12 in this entire section about how the term
13 "substantially match" should be construed and I
14 -- I give reasons why it should not be construed
15 to be the same as an exact match, that an exact
16 match is different than a substantial match.

17 If the patent owner wanted to draft
18 a claim that required an exact match, the patent
19 owner would have used the term "exact" instead of
20 the term "substantially matches." And in
21 addition, what I have in this section is, as I
22 said before, claims should be construed in light

1 of the specification, and there are several
2 portions in the specification that indicate what
3 "substantially matches" means.

4 Q. So in your opinion, a substantial
5 match does not need to be an exact match, which
6 is what you've stated, correct?

7 A. Right.

8 I -- in my opinion, a substantial
9 match, which is recited in the claim, is
10 different than an exact match.

11 Q. But can an exact match be a
12 substantial match?

13 A. Well, I just answered that
14 question. I see -- based upon the language of
15 the claim itself, as well as the explanation in
16 the specification that's related to substantial
17 match, that an exact match is not a substantial
18 match. They're two different things.

19 Q. So in your view, where you have
20 attraction data and the party information exactly
21 matches an acceptance factor of the attraction,
22 you're saying that would not be a substantial

1 match?

2 A. You know, I don't know if I said
3 exactly what you just stated in my declaration.

4 What I did state in my declaration
5 is that the claim language itself and -- and the
6 specification, because claims should be construed
7 in light of the specification, indicate that an
8 exact match is not a substantial match.

9 Q. So I wasn't asking what you stated
10 in your declaration. I was asking for your
11 opinion, having reviewed the patent.

12 In your view, where an
13 attraction -- where attraction data exactly
14 matches an acceptance factor -- I'm sorry --
15 where information about a party exactly matches
16 an acceptance factor of -- of an attraction, is
17 that a substantial match?

18 A. So by your question, you mean that
19 there's a -- a profile -- that there's a match
20 between one profile element and one acceptance
21 factor and you -- we would consider -- would I
22 consider that to be an exact match?

1 Is that your question?

2 Q. No.

3 My question is, Where there's
4 an exact match between one profile element and
5 one acceptance factor, would that be a
6 substantial match?

7 A. So if there's one match between one
8 profile factor -- I want to make sure I use the
9 terms right from Figure 12 -- and one acceptance
10 factor, only that, and nothing else, would that
11 be considered a substantial match?

12 And, you know, I think that that
13 statement would be inconsistent with the opinion
14 that I put in my declaration, which is my
15 opinion -- otherwise, I wouldn't have put it
16 there -- about what a substantially matched --
17 "substantially matches" means. And that's
18 because one of the things I note is that a
19 substantial match excludes an unalluring or a
20 neutral match, which occurs between information
21 about a party and data about an attraction.
22 Because that same bullet point goes on and says

1 that an unalluring match represents everything
2 that is neither a substantial match nor a poor
3 match, which is no minus marks that are not
4 nullified and having nothing in its favor, no
5 positive response mark -- marks or, as a matter
6 of policy, not enough in its favor.

7 Q. So in the bullet point below that,
8 you do say, Attraction data substantially matches
9 party information when the party profile matches
10 at least one acceptance factors having a positive
11 response.

12 Do you see that?

13 A. I see that sentence. And I also
14 see the sentence preceding it which says that
15 substantially matches are matches more alluring
16 than an unalluring match.

17 Q. So do you disagree with that
18 statement now?

19 A. No, I don't think I disagree with
20 any statements that are in my declaration; but
21 I'm just saying that you didn't read the complete
22 portion of even this paragraph and that you

1 should consider the entire portion.

2 Q. So considering the entire portion,
3 we have an exact match; and I believe earlier,
4 you agreed that an exact match would not be
5 unalluring; is that correct?

6 A. An exact match is different than an
7 unalluring match.

8 Q. Okay. And you -- so if we have an
9 exact match, would that be a substantial match?

10 A. So what I tried to explain before
11 as we've been talking about this section as what
12 -- as -- as what I -- in addition to what I
13 explained in my declaration, it's my opinion,
14 based upon the plain and ordinary meaning of the
15 claim, as well as the specification, because
16 claims should be interpreted in light of the
17 specification, that an exact match is not a
18 substantial match, that they're two different
19 things.

20 Q. Doesn't an exact match fall within
21 the scope of an -- of a substantial match?

22 A. So I think I answered that question

1 both in my declaration as well as here, that an
2 exact match is not a substantial match.

3 Q. So if we've kind of got a scale of
4 does not match at all to matches exactly on -- on
5 the other end, is somewhere along that scale, you
6 would start to consider it to be substantial?

7 A. Well, again, I'm relying on the
8 claim language itself as well as what's in the
9 specification, because claims should be construed
10 in light of what's in the specification.

11 So, you know, the term
12 "substantially matches" according to my opinion,
13 it exclude -- excludes a poor/low match, which
14 clearly violates some clearly identified party
15 preferences.

16 And so it also mentions aversion
17 marks. And then it also excludes an unalluring
18 match. And then that paragraph talks about what
19 an unalluring match is.

20 So I think your question was kind
21 of restricted to what -- to whether or not
22 there's a presence of -- or the number of -- of

1 positive response marks in that matrix that we
2 just looked at at Figure 12.

3 So I think what you mentioned as
4 being substantially matches is -- is different
5 than my opinion, because my opinion also
6 discusses things like aversion marks, whether or
7 not they're present, and what a poor/low match is
8 and that "substantially matches" excludes a
9 poor/low match, and what an unalluring or a
10 neutral match is, and that a substantial match
11 excludes an unalluring match.

12 Q. So I see in your declaration you
13 pointed to those portions of the specification
14 indicating that substantially matches excludes a
15 poor/low match and excludes an unalluring match.

16 Where does the specification
17 indicate that substantially matches excludes an
18 exact match?

19 A. So I think each of the passages
20 from the specification that I've identified
21 indicates that "substantially matches" is
22 different than a exact match, because, for

1 example, excluding a poor/low match doesn't mean
2 -- doesn't mean that substantially matches is the
3 same thing as an exact match.

4 Similarly, excluding an unalluring
5 match doesn't mean that "substantially matches"
6 is the same thing as an exact match.

7 So I think all of the passages that
8 I cited from the specification of the '983
9 patent, as well as the claim language itself,
10 indicates that a substantial match is different
11 than an exact match.

12 Q. None -- none of those passages talk
13 about an exact match, do they?

14 A. Well -- so I think I would disagree
15 with your statement, because I think that when
16 particular paragraphs of the specification
17 discuss what a substantial match -- how a
18 substantially matches should be interpreted -- I
19 think that's -- that relates to whether or not a
20 substantial match is an exact match.

21 And in particular, these passages
22 from the patent indicate that a substantial match

1 is not an exact match because it's describing
2 substantially matches in a way that would
3 indicate that substantially matches is different
4 than an exact match.

5 Q. Where in the -- can you show me
6 where exactly in those passages an exact match is
7 discussed?

8 A. Sure.

9 (Whereupon, the witness reviews the
10 material provided.)

11 THE WITNESS: So one of the cites
12 that I have in my declaration regarding
13 substantially matches, in the -- well,
14 first of all, in the claim language
15 itself, it uses the term "substantially
16 matches"; it doesn't use the term "exact
17 matches."

18 And if the inventor and his
19 attorney wanted to cover an exact match,
20 he certainly would have known how to do
21 so by putting the term "exact match"
22 instead of the term "substantially

1 matches." So one of the things is the
2 language of the claims itself.

3 And elsewhere, for example, at
4 Column 6, Lines 50 to 53, it's talking
5 about what a substantial match -- or
6 there are passages related to how the
7 term "substantially matches" should be
8 interpreted. A historic recreation of
9 the gunfight at the O.K. Corral might be
10 rated low, that is, as a poor match, for
11 parties with an aversion to violence.

12 So that particular sentence is
13 talking about what a poor or low match
14 is, and a substantially match is
15 different than -- it excludes a poor/low
16 match.

17 BY ATTORNEY HUGHES:

18 Q. That section doesn't say it
19 excludes an exact match, does it?

20 A. So this section of the patent, as
21 well as all other sections of the patent that I
22 identified, are describing what -- or relate to

1 how substantially matches should be interpreted.
2 And so, collectively -- or individually, they're
3 indicating that substantially matches is
4 different than an exact match.

5 Q. And can you show me where in the
6 specification it indicates that a substantial
7 match excludes an exact match?

8 A. So I just referred you to Column 6,
9 Lines 50 to 53, so I assume that your question
10 means what other portions of the specification
11 indicate that a substantial match is not an exact
12 match.

13 Q. So I -- when I read 5th -- 6, 50 to
14 53, I see it talking about a poor match but not
15 an exact match.

16 Do you agree with that?

17 A. So Column 6, Lines 50 to 53 state
18 as follows: Historic recreation of the gunfight
19 at the O.K. Corral might be rated low, that is,
20 as a poor match, for parties with an aversion to
21 violence.

22 And the reason why I cited to this

1 particular column and group of lines in
2 the patent is because I'm showing that the -- the
3 claim term "substantially matches" excludes this
4 type of poor/low match that's mentioned in
5 this -- in this column and line numbers.

6 I should also point out that this
7 sentence, as well as the other portions of the
8 specification that I mentioned, don't say that in
9 order to be a substantial match, it has to be an
10 exact match. It's just referring -- it's just
11 contrasting what a substantial match is from what
12 a substantial match is not.

13 Q. Okay. But still, even on that
14 portion in Column 6, there is no discussion of an
15 exact match, is there?

16 A. Well, it doesn't use the phrase
17 "exact match" in the sentence; however, I think
18 the sentence is related to how "substantially
19 matches" should be interpreted, and -- because
20 it's -- it's indicating that "substantial match"
21 is -- is excluding a poor/low match. It's --
22 which is inconsistent with saying that a

1 substantial match is the same thing as an exact
2 match.

3 (Whereupon, the witness continues
4 to review the material provided.)

5 THE WITNESS: And the other
6 passages that I cited to in the '983
7 patent also helped to explain what the
8 interpretation of the claim term
9 "substantially matches" should be.

10 BY ATTORNEY HUGHES:

11 Q. And those include, for example,
12 discussions that substantially matches excludes
13 an unalluring match; is that right?

14 A. So the paragraph that we were just
15 talking about in my declaration also mentions
16 other portions of the '983 patent which relate to
17 poor and low matches and how that relates to how
18 the claim term "substantially matches" should be
19 interpreted.

20 And the -- the paragraph below
21 that -- or the bullet point below that also
22 indicates that substantially matches excludes an

1 unalluring match.

2 Q. So in -- in those answers, I didn't
3 hear anything where there's a passage that states
4 that substantially matches excludes unallur- --
5 or excludes an exact match.

6 A. So, you know, I -- I'll beg to
7 differ and disagree with the statement that you
8 just made because it's clear to me that, from the
9 plain and ordinary meaning of the term
10 "substantial match" -- "substantially matches"
11 that's recited in the claim, as well as the
12 portions of the specification that relate to the
13 meaning of that phrase, indicates that a
14 substantial match is different than an exact
15 match because it's inconsistent with the
16 construction of "substantially match" being an
17 exact match.

18 All of these passages that I've
19 cited in the '983 patent are consistent with such
20 a construction, which I believe would be wrong.

21 Q. Are you aware of anywhere in the
22 specification that expressly discu- -- discusses

1 an exact or perfect match?

2 A. Yeah. Expressly -- the phrase that
3 you use, "expressly discusses an exact match" --
4 you know, I'm not sure how I should interpret
5 that particular phrase that you used.

6 What I can say is that when you
7 look at the portion of the '983 patent that I
8 cited in my declaration, it tells us what a
9 "substantial match" means, and it also indicates
10 that a substantial match is different than an
11 exact match.

12 In fact, I go on in Paragraph 90 to
13 indicate that applicants recognized the wide
14 latitude that the invention offers to a function
15 designer and facility operator when determining
16 how a match is determined and characterized,
17 including a variety of factors talking about the
18 profile elements and attraction acceptance
19 factors and schemes for how to represent and
20 interpret them.

21 And then it also gives additional
22 quotes regarding, you know, the idea behind the

1 invention. And these quotes, in addition to the
2 ones that we've already discussed here this
3 morning, indicate to me what a substantial match
4 -- how it should be interpreted and, in
5 particular, that it's not an exact match.

6 Q. So in these paragraphs here,
7 looking at Paragraph 90 of your declaration, for
8 example. You indicate one of those is -- is a
9 discussion of a function for computing
10 desirability of an event, that it's going to be
11 empirically determined. And the greater the
12 value returned, the more desirable is the event
13 that was evaluated.

14 Do you see that?

15 A. Yeah, I see that portion of
16 Paragraph 90. That's actually the second bullet
17 point in Paragraph 90.

18 Q. The claims don't recite any
19 particular function for determining what's a
20 substantial match, do they?

21 A. So the claim, in fact, does
22 indicate the phrase "said data substantially

1 matches with said information."

2 And then the issue is, well, what
3 does the term "substantially match" mean, and
4 you're supposed to construe claims, such as the
5 claim term "substantially match," in light of the
6 specification.

7 And the specification, in
8 particular the portions that I mention in my
9 declaration, indicates how that claim term should
10 be construed.

11 Q. So are you saying that that claim
12 term should be construed to require the function
13 as described, for example, at Column 28, Line 6
14 to 16 that you cited in your declaration?

15 A. No. I don't think my declaration
16 says that.

17 My declaration says --

18 Q. I -- I was asking right now.

19 Are -- are you now saying that
20 the claim should be construed to require that
21 function as described at that column and lines of
22 the specification?

1 A. So the question is, Should the
2 claim construction of substantially matches be
3 identical to what's in Column 28, Line 6 to 16?

4 Q. My question was not if -- not if it
5 should be identical, if it should require that
6 fun- -- that specific function.

7 A. So we're talking about Column 28,
8 Line 6 to 16. And it talks about the utility
9 function for computing desirability of an event
10 is going to be empirically determined. The
11 greater the value returned by the function, the
12 more desirable is the event that was evaluated.
13 And the form of the function will be strongly
14 dependent on the number and type of parameters in
15 the party profile, the precise entity -- entry is
16 in the profile interpretation database 1200, the
17 range of travel times possible within the
18 facility, the range of queue times possible,
19 along with a measure of judgment by the function
20 designer, who should be working in consultation,
21 where appropriate, with the facility operators
22 responsible for the visitor's experience.

1 So that's what this paragraph says.
2 And the paragraph is also indicating -- it's
3 describing a utility function.

4 And so I don't see -- I mean, a
5 utility function would be a way of evaluating a
6 substantial match, but not the only way. And I
7 don't see utility function recited in the claim
8 of Claim 1. And unless I'm mistaken, it's not in
9 Claim 3 either.

10 So that's something that I wasn't
11 saying. I wasn't saying that this paragraph here
12 at Column 28 should be incorporated in its
13 entirety in the construction of "substantially
14 matches."

15 What I was saying is that this
16 paragraph, in addition to other paragraphs that I
17 cited throughout the specification, indicate what
18 a substantial match -- how it should be
19 interpreted.

20 Q. So this is one example of how it
21 can be done?

22 A. When you say "this is one example,"

1 you're referring to Column 28, the paragraph that
2 begins at Line 6. And it talks about a utility
3 function.

4 So I would say that a utility
5 function is -- is one way of measuring the degree
6 of matching between the information about the
7 party as well as data regarding the attractions.

8 Q. But again, the claims don't require
9 a utility function, correct?

10 A. I can agree with that, that
11 claim -- when you say "the claims" --

12 Q. Claims 1 and 3.

13 A. -- Claims 1 and 3 do not recite
14 a -- the phrase "utility function."

15 Q. And they don't require any other
16 specific function, correct?

17 A. Well, in order to determine whether
18 the data regarding the first set of attractions
19 and how well it matches the information about the
20 party, there would have to be some means of doing
21 that in order to determine whether it
22 substantially matches.

1 So it doesn't -- a utility function
2 would be a way of determining that, but Claims 1
3 and 3 don't recite that particular way. But
4 there would have to be a way of evaluating when
5 the data regarding the first set of attractions
6 is -- substantially matches with the information
7 about the party.

8 Q. So the claims just require a way of
9 making a selection that substantially matches,
10 correct?

11 A. Well, that's not all the claims
12 require.

13 Q. If we look at just the, for
14 example, software that selects limitation, alls
15 that's required to -- that just requires a way to
16 do that selection that substantially matches,
17 right?

18 A. So there's a phrase in here in the
19 claim software that selects said second set of
20 attractions from said first set of attractions.
21 And then it also requires the second set of
22 attractions, consisting of at least some of said

1 first set of attractions for which said data
2 substantially matches with said information.

3 So the second set of attractions,
4 according to this portion of the claim -- there's
5 two -- there's a -- there's at least two
6 requirements for an attraction to be in the
7 second set of attraction. One is that it must be
8 in the first set of attraction, and the second is
9 that the data regarding the first set of
10 attractions must substantially match the
11 information about the party.

12 So there are -- in this -- just
13 this portion of the claim, it refers to two
14 requirements that an attraction must have in
15 order to be in the second set of attractions.

16 Q. Okay. If we go back, Paragraph 90
17 of your declaration, you see where you were
18 talking about values being returned? This is the
19 beginning of that second bullet point.

20 (Whereupon, the witness reviews the
21 material provided.)

22 THE WITNESS: So I see in

1 Paragraph 90, there are a couple of
2 bullet points, and the second one talks
3 about a function for computing
4 desirability of an event is going to be
5 empirically determined; the greater the
6 value returned, the more desirable is the
7 event that was evaluated.

8 And it goes on beyond that.
9 That's not the entirety of what the
10 second bullet states.

11 BY ATTORNEY HUGHES:

12 Q. The claims don't require any
13 particular value of a match, do they?

14 A. So when you say "the claims," I'm
15 assuming you're referring to Claims 1 and 3.
16 Each of those claims has the phrase "said data
17 substantially matches with said information."
18 And the "data" is referring to data about the
19 attractions, and the "information" is -- is about
20 the party.

21 And the specification -- because
22 claim limitations should be construed in light of

1 the specification, the specification indicates
2 how the term "substantially matches" should be
3 construed.

4 Q. So in your opinion, looking at the
5 specification, should Claims 1 and 3 be construed
6 to require a certain value of match?

7 A. Well, that, I did not say either
8 here in my deposition today or anywhere in my
9 declaration.

10 Q. I'm -- I'm asking you now, though.

11 In your opinion right now,
12 looking at the specification, should Claims 1 and
13 3 be construed to require a certain value of
14 match?

15 A. I never said that either here or in
16 my declaration, so that would not be my opinion.

17 Q. So with those values -- let's say
18 we did have a value scale from 0 to 10.

19 Okay?

20 A. So when you say "a value scale from
21 0 to 10" -- I'm not quite sure what you mean by
22 "value scale from 0 to 10."

1 Q. So if we go to -- so if we look at
2 the -- Column 28, Lines 31 to 42.

3 Do you see that?

4 (Whereupon, the witness reviews the
5 material provided.)

6 BY ATTORNEY HUGHES:

7 Q. Do you see where it says, A
8 convenient basis for constructing a utility
9 function is the 1 to 10 scale?

10 A. That's the first sentence of a
11 paragraph beginning at Column 28, Line 31.

12 Q. And it indicates that a result of
13 10 represents an attraction that makes the best
14 possible match.

15 Correct?

16 A. I don't think it says exactly that.
17 It says, A result of 10 represents
18 an attraction that makes the best possible --
19 and, then in parentheses, it says, or best
20 available match to a party's profile, just a few
21 steps away.

22 Q. If something matches the party's

1 profile exactly, could there be any match that's
2 better than that?

3 A. If something matches the party's
4 profile exactly -- could there be a better match
5 than an exact match?

6 I think, generally, there can't be
7 a better match than an exact match.

8 ATTORNEY HUGHES: I think -- can
9 we go off the record, please?

10 THE VIDEOGRAPHER: Going off the
11 record. The time is 1:02 p.m.

12 --oOo--

13 (Whereupon, at 1:02 p.m. EST, a
14 luncheon recess was taken.)

15 --oOo--

16

17

18

19

20

21

22

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

A F T E R N O O N

S E S S I O N

(1:53 p.m. EDT.)

--oOo--

GREGORY JOSEPH GONSALVES, PH.D.,
was called for continued examination and, after
having been previously duly sworn by the
certified stenographer to tell the truth, the
whole truth and nothing but the truth, was
examined and testified further as follows:

--oOo--

THE VIDEOGRAPHER: We're back on
the record, and the time is 1:53 p.m.

You may begin.

--oOo--

EXAMINATION (CONTINUED) BY COUNSEL FOR PETITIONER

--oOo--

BY ATTORNEY HUGHES:

Q. Okay.

All right. Dr. Gonsalves, I'm
passing you what is marked as Exhibit 1007 in
this proceeding.

(Deposition Exhibit Number 1007

1 referred to herein.)

2 BY ATTORNEY HUGHES:

3 Q. This is a copy of the Waytena
4 reference.

5 Do you recognize this document?

6 A. Yes, I do.

7 Q. And is this the Waytena reference
8 that you discuss in your declaration?

9 A. Yes, it is.

10 Q. So I'd like to turn to Paragraph --
11 to Column 14 in Waytena, and if you can go to
12 Line 13 there.

13 Let me know when you're there.

14 A. So you said Column 14, Line 13?

15 Q. Yes. It starts with, While in idle
16 state 501.

17 A. Okay.

18 Q. Do you see that?

19 A. Yes.

20 Q. And in that, this is discussing the
21 user interface that is on Figure 5B of the PCD
22 device, correct?

1 A. So Column 14, the paragraph
2 beginning with Line 13, talks about user
3 interface 201 as shown in Figure 5B. And then if
4 I look at the description of 5B in Column 4,
5 which is at Line Number 37, it says, Figure 5B is
6 a sample screen for requesting reservations,
7 obtaining information and viewing, modifying or
8 canceling previously made reservations according
9 to the present invention.

10 Q. Okay. And if we can go back to
11 Column 14.

12 A. Okay.

13 Q. Do you see around Line 20, there's
14 a sentence that starts, If desired?

15 A. Yes, I see that.

16 Q. And that indicates that the patron
17 may also be presented with a list of attractions
18 that match the particular preferences of the
19 members of the patron's group or that are in
20 relative proximity to the patron's current
21 location.

22 Correct?

1 A. Sure, I see that.

2 Q. And that presentation of the list
3 is done by the PCD, correct?

4 A. So the sentence says that the
5 patron may be presented with a list of
6 attractions that match the particular preferences
7 of the members of the patron's group. It doesn't
8 specifically mention what does the presenting;
9 although, earlier in the paragraph, it does
10 mention that -- it does refer to user interface
11 201, which is shown in Figure 5B.

12 Q. All right. And the user or the
13 patron does not select the attractions for that
14 list, correct?

15 A. So it says that the patron may also
16 be presented with a list of attractions, which is
17 different than an itinerary, so list of
18 attractions that match the particular preferences
19 of the members of the patron -- patron's group.
20 So because the patron is being presented with a
21 list of attractions, then that sentence indicates
22 that the patron is not creating the list of

1 attractions.

2 Q. And that list is one -- is
3 attractions that match the preferences of the
4 patron's group or that are in close proximity to
5 them, correct?

6 A. Yeah, that sentence says that the
7 list of attractions match the particular
8 preferences of the members of the patron's group
9 or that are in relative proximity to the patron's
10 current location.

11 Q. And if the patron wanted to visit
12 one of those recommended attractions, they could
13 request a reservation, correct?

14 A. So I see here at Column 14, it does
15 mention reservations. For instance, it says that
16 the user interface 201 presents a screen 540 as
17 known Figure 5B, which includes a scrollable
18 and/or pageable list of available attractions,
19 buttons 542 and 543 for obtaining information or
20 generating reservation requests for the selected
21 attractions.

22 So the first sentence of this

1 paragraph is indicating that -- that the
2 interface includes buttons for generating --
3 among other things, generating reservation
4 requests for selected attractions.

5 Q. And as part of that, the user does
6 not need to pick the time that they want to visit
7 the attraction, correct?

8 A. Well, I don't think the paragraph
9 says that.

10 Q. If we look at -- on -- in
11 Column 14, and this is talking about the user
12 interface on -- on 5C. If we look at around Line
13 47 -- or, I guess, if -- first, let's start at
14 about Line 46.

15 There's a button 562 that
16 allows a patron to request a specific time for a
17 reservation, correct?

18 A. So you're still on Column 14,
19 right?

20 Q. Yes.

21 A. So I notice that at Line 46,
22 there's a sentence that says, Button 562 allows

1 the patron to request a specific time for the
2 reservation.

3 Q. And then on Line 47, there's a
4 button 563 that allows a patron to request just
5 the next available time, right?

6 A. The next sentence following the one
7 I just read says button 563, which is a different
8 button than button 562, requests the next
9 available time.

10 Q. And if a user requests next
11 available time, the user does not check for what
12 that time would be, do they?

13 A. So this particular portion of the
14 paragraph doesn't specify either way, whether the
15 user is specifying what time would be the next
16 available time or whether the user or the patron
17 is not specifying what would be the next
18 available time. It just doesn't indicate either
19 way.

20 Q. If you turn to Column 23, do you
21 see Line 3?

22 A. The one that begins -- the

1 paragraph that begins, With processor 209?

2 Q. Yes.

3 Do you see where it says that
4 the processor 209 determines whether the patron
5 requested a specific time for the reservation?

6 A. Correct.

7 Q. And a variable timeReq is set 7:08
8 to the specific time if requested, right?

9 A. Yes, it does say that.

10 Q. And then if no specific time was --
11 was requested, it sets it to the current time,
12 correct?

13 A. So, number one, it's unclear to me
14 how this portion of the specification -- because
15 it's not clear in the specification, how this
16 paragraph of Column 23 relates to the paragraph
17 we were just reading nine paragraphs earlier in
18 Column 14. But I do note that this paragraph
19 beginning at Line 23 of -- Line 3 of Paragraph --
20 of Column 23 indicates that the processor
21 determines whether the patron requested a
22 specific time for the reservation and a variable

1 called timeReq is set in Step 708 to the specific
2 time if requested or at Step 707 to the current
3 time if no specific time was requested.

4 So this indicates to me that this
5 portion of the -- of the -- of Waytena is
6 indicating that -- that this -- the variable
7 timeReq -- T-I-M-E capital R-E-Q -- is set to the
8 current time if no specific time was requested.

9 Q. In looking at that, in that
10 paragraph, it indicates that this also checks for
11 other reservations previously made by the patron.

12 Do you see that?

13 A. In the same paragraph?

14 Q. Um-hum.

15 A. There's a sentence immediately
16 following the one I just read, which states as
17 follows: If PCD 102 has transmitted information
18 describing other reservations previously made by
19 the patron, as may be optionally provided and
20 requests message data structure 420, processor
21 209 then checks at Step 709 whether other
22 reservations previously made by the patron

1 conflict with the time specified by the variable
2 timeReq, T-I-M-E capital REQ; if so, timeReq,
3 that same variable, is adjusted to avoid the
4 conflict.

5 So this paragraph is specifically
6 talking about how the contents of the variable
7 named timeReq is completed.

8 Q. And part of that is checking to see
9 if there may be conflicting reservations,
10 correct?

11 A. So there's a check done by the
12 processor at Step 709 to determine whether other
13 reservations previously made by the patron
14 conflict with the time specified in the variable
15 timeReq.

16 Q. Okay. And if you go to Column 10,
17 starting about Line 53.

18 This talks about information in
19 a virtual queue.

20 Do you see that?

21 A. Yes, I see that paragraph at
22 Column 10.

1 Q. And do you see, starting at
2 Line 55, this indicates that the request
3 processor determines the next available time or
4 position for a reservation from the virtual
5 queue, as described, correct?

6 A. So, again, I'll point out that we
7 were just reading from Columns 24 and, before
8 that, Column 14. I'm not sure because the
9 specification -- the -- Waytena is not clear
10 about how these two different sections relate to
11 each other or if they even do.

12 But I do see the sentence at
13 Line -- beginning at Line 55, that states, When
14 requested, request processor 209 determines the
15 next available time or position for a reservation
16 from the virtual queue, as described below.

17 Q. So based on that, you would agree
18 that it's not the user determining next available
19 time, correct?

20 A. So I guess it would depend upon
21 what portion of Waytena you're talking about, but
22 in this section that we're just reading, it

1 indicates something timeReq a "request
2 processor," when requested, determines the next
3 available time or position for a reservation from
4 the virtual queue. So this particular sentence
5 is indicating that the request processor is
6 determining the next available time or position
7 for a reservation from the visual -- from the
8 virtual queue.

9 Q. And it doesn't indicate that the
10 patron is doing that determination of a next
11 available time, does it?

12 A. So this particular sentence I just
13 read doesn't mention the patron.

14 Q. Okay. Now, you recall, when we
15 were looking at Column 14, we were discussing
16 that list of attractions that match that may be
17 presented if desired.

18 Do you recall that?

19 A. Yeah, and I think I remember saying
20 that it's not clear in Waytena how the discussion
21 of Claim 14 relates to the discussion on -- I
22 mean, the discussion at Column 14 relates to the

1 discussion of Column -- at Column 10.

2 Q. With that list of attractions that
3 match, a user can select reservations for those
4 after the list has been presented to them, right?

5 A. So now you're talking about
6 something different.

7 Column 10, we were talking about
8 the request processor determining the next
9 available time or position for a reservation.

10 Q. Yeah. My question now is on -- if
11 we go back to Column 14 and around Line 20 to 24,
12 the user interface on the PCD is capable of
13 presenting the patron with a list of attractions
14 that match.

15 Do you agree?

16 A. So this particular paragraph only
17 mentions PCD at the very end, where it talks
18 about PCD entering various states, but earlier --
19 and so it -- it doesn't specifically say what the
20 PCD is doing with respect to presenting the list
21 of attractions, but it also indicates that the
22 patron may also be presented with a list of

1 attractions that match the particular preferences
2 of the members of the patron's group or that are
3 in relative proximity to the patron's current
4 location.

5 I do see that sentence in this
6 paragraph.

7 Q. Okay. Do you see in Column 13 at
8 Line 37 where it indicates that PCD starts in an
9 idle state 501?

10 A. Yes, it -- it says PCD 102 starts
11 in an idle state.

12 Q. And you agree that the user
13 interface 201 is part of the PCD, correct?

14 And we can see that, for
15 example, in Figure 2.

16 A. So -- let me turn to Figure 2.

17 So I see in Figure 2 there's an
18 attraction computer identified by Reference
19 Number 101 and that there's a patron PCD
20 identified by Reference Number 102.

21 Q. And within that patron PCD, do you
22 see user interface 201 --

1 A. Yeah, I see that --

2 Q. -- the top left?

3 A. -- I see that in the -- in the box
4 labeled Patron PCD.

5 Q. Okay. And we said -- we agreed on
6 Column 13, around Line 37, this indicates that
7 the PCD starts in an idle state 501, correct?

8 A. Now you're back to Column 13,
9 Line 37?

10 Q. Yes.

11 A. Yes, the first sentence of that
12 paragraph states that PCD 102 starts in an idle
13 state 501.

14 Q. So when we go back to Column 14, at
15 Line 13 -- and this is -- this is the paragraph
16 that talks about presenting that list of matching
17 attractions -- do you see it starts, saying,
18 While in idle state, user interface presents a
19 screen?

20 A. Yeah, I see that.

21 Q. Do you agree that this is -- with
22 what we've just looked at, that this indicates

1 the PCD is doing this?

2 A. So the sentence says, While in idle
3 state 501, which refers to an idle state that the
4 PCD is in, which is cited Number 102, and the --
5 it mentions something about a user interface 201.
6 And I see from what we looked at at Figure 2 that
7 the user interface 201 is in the patron PCD
8 identified by Reference Number 102.

9 Q. So do you agree that the PCD is
10 presenting that list?

11 A. Presenting that list?
12 (Whereupon, the witness reviews the
13 material provided.)

14 THE WITNESS: So it indicates that
15 the user interface 201 presents a screen
16 540 as shown in Figure 5B which includes
17 a scrollable and/or pageable list 541 of
18 available attractions.

19 So the user interface is, in fact,
20 according to this sentence, presenting a
21 screen identified by Reference Number 540
22 as shown in Figure 5B that includes a

1 scrollable and/or pageable list of
2 available attractions.

3 BY ATTORNEY HUGHES:

4 Q. And this paragraph, as we talked
5 about, also indicates that that screen can
6 present the patron with a list of attractions
7 that match particular preferences of the members
8 of the patron's group or that are in relative
9 proximity; is that right?

10 A. There's a sentence later on in the
11 paragraph which states that if desired, the
12 patron may also be presented with a list of
13 attractions that match the particular preferences
14 of the members of the patron's group or that are
15 in relative proximity to the patron's current
16 location.

17 Q. And you agree that the PCD with its
18 user interface is doing that?

19 A. I think there's an indication that
20 the patron is being presented with a list of
21 attractions that match the particular preferences
22 of the members of the patron's group and that

1 earlier in the paragraph, it's indicating that
2 the user interface 201 presents a screen as shown
3 in Figure 5B which includes a scrollable and/or
4 pageable list 541 of available attractions.

5 So from those two sentences, I
6 think that the list of attractions -- it doesn't
7 say who's creating the list of attractions, but
8 it's saying that they're presented on the user
9 interface 201 the patron PCD 102.

10 Q. Okay. I'm now showing what's
11 marked as Exhibit 1005 in this proceeding.

12 (Deposition Exhibit Number 1005
13 referred to herein.)

14 BY ATTORNEY HUGHES:

15 Q. Do you recognize this as a copy of
16 the reference referred to as "SIM"?

17 A. Yes, I do.

18 Q. And you reviewed this reference?

19 A. Yes.

20 Q. And this is the SIM reference that
21 you discuss in your declaration, correct?

22 A. Yes.

1 Q. And SIM is directed to a queue
2 management system, including according to the
3 Abstract, correct?

4 A. That's the very first phrase on the
5 Abstract.

6 Q. And if -- can you go to Page 22 of
7 SIM?

8 A. Page 22.

9 Okay.

10 Q. And do you see towards the bottom,
11 around Line 30, it's starting to talk about a
12 park visitor or user would use terminals
13 installed at a park entry points and information
14 kiosks to enter ride and time preferences?

15 Do you see that?

16 A. Yes, I see that sentence.

17 Q. And SIM also indicates that its
18 system requests other information about the park
19 visitors, such as height or health status, which
20 may be relevant in allowing access to certain
21 information -- to certain rides and information,
22 such as the needs for a stroller or wheelchair.

1 Do you see that?

2 A. Correct.

3 Q. And if we look at Page 23, do you
4 see where this indicates, starting about Line 8,
5 that there's a controlling computer that stores
6 information in a database on each user and each
7 member of a group?

8 A. Yes, I see that sentence -- or the
9 beginning of the sentence on Page 23, the second
10 full paragraph.

11 Q. And that, again, lists some of the
12 information about that group that can be stored,
13 correct?

14 A. So on Page 23, the second full
15 paragraph, it states that the controlling
16 computer 3 can store information in a database on
17 each user and each member of a group, for
18 example, prompter serial number, relationship to
19 other prompters or on tags, arrival time,
20 preferred language, attract preferences, time
21 preferences.

22 And then it keeps going on and on

1 for several lines after that.

2 Q. So you agree that SIM system has
3 information on the parties and stores it in its
4 databases, correct?

5 A. The sentence that we just looked at
6 on Page 23 indicates that the controlling
7 computer identified by Reference Number 3 can
8 store information in a database on each user and
9 each member of the group and then discusses some
10 exemplary in -- information that may be stored in
11 that database.

12 Q. And SIM -- SIM system also stores
13 information about the attractions, right?

14 A. I'm trying to find the place where
15 SIM talks about attractions. It's more difficult
16 for me because --

17 Q. So, for example, if you --

18 A. -- I'm not searching on the
19 computer; I'm flipping through the pages one at a
20 time.

21 Q. -- so, for example, if you see on
22 Page 34, Lines 3 to 5, this indicates that

1 particular rides might have age, size or health
2 restrictions, correct?

3 A. Okay. Page 34, first full
4 paragraph?

5 Q. Yes.

6 A. So it states at that paragraph,
7 When only certain members of a group are eligible
8 for a particular ride because of age, size of
9 health restrictions -- I think it should be "size
10 or health restrictions" -- the system will only
11 allow access to correctly registered users if all
12 users have prompts or Qtags.

13 So this sentence is indicating, to
14 me, when the system will allow access and when it
15 will not.

16 Q. And so it needs to have that
17 information about the attractions in order to
18 determine whether someone's allowed to access
19 them, correct?

20 A. So this sentence refers to a ride,
21 and it's also referring to -- it's also referring
22 to age, size, health restrictions.

1 Q. So SIM system uses that information
2 about the rides and the patrons to determine who
3 can go on which rides, correct?

4 A. Well, this sentence is indicating
5 that the system will only allow access to
6 correctly registered users if all users have
7 prompters or Qtags. So what this sentence is
8 saying is that in order to be allowed access, a
9 user has to be registered and all users in the
10 group have to have prompters or Qtags.

11 Q. But this also says that -- it talks
12 about members of the group being eligible for the
13 ride, correct?

14 A. Well, I think it's talking about
15 the situation -- it says "when only certain
16 members of a group are eligible for a particular
17 ride," which indicates, to me, that this is a
18 situation where some of the members of the group
19 are eligible and some are not. And in that
20 scenario, the system allows access to correctly
21 registered users. So, in other words, in that
22 scenario, a user can -- is permitted access if

1 it's correctly registered and if all the users in
2 the group have prompters or Qtags.

3 Q. So in SIM, there's what's timeReq a
4 "queue manager," correct?

5 A. Yeah, I'm looking for the instance
6 of queue manager. I seem to remember SIM
7 mentioning a queue manager, but I can't seem to
8 locate it.

9 Q. So if we can go to Page 34, for
10 example, starting at Line 15.

11 A. Yes, Page 34, Line 15 mentions a
12 queue manager.

13 Q. And then do you see a little bit
14 further down around Line 23, this indicates that
15 the queue manager includes means of calculating
16 the actual time and sequence of attendance at
17 queue entrances offered to the user?

18 A. I see that sentence.

19 Q. And so it's the queue manager
20 that's generating the sequence of attractions for
21 the user, correct?

22 A. I don't think it says that. It

1 says that it includes means of -- of calculating
2 the actual time and sequence of attendance at
3 queue entrances.

4 Q. So the queue manager calculates the
5 sequence of attendance offered to the user,
6 correct?

7 A. The sequence of attendance at queue
8 entrances offered to the user.

9 Q. So the user does not select that
10 sequence of attendance, right?

11 A. So this sentence doesn't say
12 anything that the -- anything about what the user
13 does or doesn't do. It does say that the queue
14 manager includes means of calculating the actual
15 time and sequence of attendance at queue
16 entrances offered to the user.

17 Q. So you're saying you're not sure if
18 the user is selecting their sequence of events
19 there?

20 A. So that, I didn't say.

21 What I did say is that this portion
22 of SIM that we're talking about now is indicating

1 that the queue manager includes means of
2 calculating the actual time and sequence of
3 attendance at queue entrances offered to the user
4 and that this section of SIM doesn't discuss what
5 the user is or isn't doing.

6 Q. Okay. But this is discussing what
7 the queue manager is doing, correct?

8 A. That particular sentence is
9 indicating what the queue manager includes.

10 Q. Now, in SIM, users can select
11 certain rides that they would like to go on,
12 right?

13 A. That's consistent with my memory of
14 SIM; although, because I didn't memorize the
15 entire document, along with all the other
16 references that are part of this IPR, I can't
17 immediately find the location of SIM that talks
18 about that.

19 Q. Now, in SIM, though, a user may not
20 get all of the attractions they select, correct?

21 A. A user may not get all the
22 attractions that the user selects.

1 So I don't remember SIM stating
2 that; although, because I didn't memorize the
3 entire however many pages this is, over 50 pages
4 -- 60 page -- 62 pages, counting the figures, I
5 didn't memorize the whole thing.

6 So . . .

7 Q. So, for example, if you go to
8 Page 23, around Line 32, it says that The
9 controlling computer can be programmed to
10 reallocate every user's sequence used in
11 accordance with a preset algorithm or to cope
12 with unexpected events.

13 Do you see that?

14 A. Yeah, I see that.

15 Q. And if we go to Page 24, for
16 example, this gives some examples of these types
17 of reallocations, right?

18 A. Yeah, SIM does talk about
19 reallocations.

20 Q. And one of those might be if a ride
21 failure -- failure occurs?

22 (Whereupon, the witness reviews the

1 material provided.)

2 THE WITNESS: So SIM lists
3 different examples that could result in
4 reallocation, and one of them is if ride
5 failure occurs, it may -- yeah, that's --
6 that's one of the -- that's one of the
7 situations that can result in
8 reallocation.

9 BY ATTORNEY HUGHES:

10 Q. And another one under Number 2 on
11 Page 24 is about users -- every user getting a
12 minimum number of rides, correct?

13 A. It says on entry number 2 that It
14 may be the policy that every user gets a minimum
15 number of rides (depending upon the time of
16 registration).

17 Q. And it indicates, for example, that
18 morning attendees could be given a reduced number
19 of rides in the afternoon to allow an increased
20 number of rides to the late attendees.

21 Do you see that?

22 A. The last sentence in that section

1 says that These morning attendees could then be
2 given a reduced number of rides in the afternoon
3 to allow an increased number of rides to the late
4 attendees.

5 Q. And, again, this is the controlling
6 computer with its preset algorithm that is making
7 these reallocation determinations, correct?

8 A. So it's indicating that the
9 controlling computer has some involvement in
10 re- -- reallocating the user's sequence used in
11 accordance with a preset algorithm or to cope
12 with unexpected events.

13 Q. So in SIM, it's that computer
14 that -- that is doing the reallocation, correct?

15 A. Well, I think it doesn't say that
16 much.

17 It -- it does say that the
18 controlling computer is involved with
19 reallocating the user sequence. So there are
20 other locations, as I expressed in my expert
21 declaration, where the patron or the user is also
22 involved with reallocation.

1 Q. Where would that be?

2 A. So -- so there are numerous
3 locations in SIM indicating that the person or
4 patron selects which queue they wish to join, for
5 example, at Column 7, Lines 18 to 19.

6 At Column 8, Lines 22 to 24,
7 there's an indication that people are allowed to
8 select a preferred sequence of queues to be
9 joined.

10 At Column 7, Lines 31 to 32, it
11 indicates that a person can remotely register for
12 a plurality of queues.

13 At Column 9, Lines 25 to 26, it
14 indicates a user registering for a queue
15 sequence.

16 At Column 17, Lines 22 to 27, it
17 states that Registration for queues of users can
18 be received either automatically by the removal
19 of a prompter from a dispenser for a single ride
20 or for multiple rides.

21 Q. None of those mentioned
22 reallocation, though, did they?

1 A. So I think I would not agree with
2 your statement because I think these -- the
3 numerous -- in fact, I only read some of them,
4 not all of them -- the numerous instances that
5 are mentioned throughout SIM of the patron or
6 person or user selecting queues which they wish
7 to join are numerous.

8 And so I think, in the context of
9 the entire SIM publication, it's indicating that
10 the user does have an involvement in selecting
11 the queues that they wish to join in various
12 circumstances.

13 Q. But if we go back to Page 23, at
14 Line 32, you agree that the controlling computer
15 itself can be programmed to reallocate user's
16 sequences in accordance with a preset algorithm,
17 correct?

18 A. So that's what that sentence says.
19 Clearly, the computer -- controlling computer is
20 an -- has some involvement in reallocating every
21 user sequence, but there's also an indication in
22 SIM that the user has an involvement.

1 Q. Okay. We can set SIM aside.
2 And I'm now going to hand you
3 -- go ahead --

4 A. Yes --

5 Q. -- take care of that first.

6 A. -- while we're in between exhibits,
7 I can refresh my drink.

8 ATTORNEY KESAN: You need
9 caffeine, man, not that water stuff.

10 THE WITNESS: It's for mouth
11 dryness, not to stay awake. This
12 gentleman is keeping me awake. I don't
13 need something else to keep me awake.

14 BY ATTORNEY HUGHES:

15 Q. I'm handing you now what's been
16 marked as Exhibit 1006 in this proceeding.

17 (Deposition Exhibit Number 1006
18 referred to herein.)

19 BY ATTORNEY HUGHES:

20 Q. Do you recognize this as a copy of
21 the Doi reference that's discussed in your
22 declaration?

1 A. Yes, I do, although there may be a
2 disagreement as to how to pronounce this
3 gentleman's last name.

4 Q. How -- how would you?

5 A. Well, I would pronounce it as Doi,
6 but in light his first name, it's probably a
7 Japanese. So maybe you're correct. So . . .

8 Q. I'll refer to him as Doi.

9 Will -- will you understand
10 that?

11 A. Yes --

12 Q. Okay.

13 A. -- that's fine.

14 Q. And Doi is directed to a custom
15 navigation system for, among other things, a
16 theme park, right?

17 A. So I see that it is a customer
18 navigation system. And I see, for example, on
19 Figure 11, this seems to be information about a
20 theme park.

21 Q. And then if you look at the
22 Background of the Invention section, in the first

1 paragraph, that discusses theme parks, aquariums,
2 museums, other types of attractions, right?

3 A. Sure.

4 The very first sentence of the
5 Background mentions large-scale attraction
6 facilities, such as theme parks, aquariums and
7 museums.

8 Q. And if we look at Doi for example,
9 let's go to -- so in Column 5, Line 21, do you
10 see that this is talking about information that
11 can be stored in the customer navigational
12 terminal?

13 A. So you're at Column 5, Line 21? Is
14 that where you're at?

15 Q. Yes.

16 And if you look a little bit
17 above that, in the first full paragraph above, it
18 references the customer navigation terminal.

19 A. So I see in the previous paragraph,
20 it begins with The customer navigation terminal
21 1A, and it indicates that it's made by a nickname
22 memory 11, like a memory card, as an

1 identification information memory.

2 Q. And if we look at Column 5,
3 around -- you know, that paragraph from Line 21
4 to about 29, some of that customer information
5 includes height and age?

6 A. So it indicates that The nickname
7 memory identified by reference number 11 is
8 adapted, as shown in Figure 4A to 4C, to memorize
9 the customer's nickname and besides, parameters,
10 such as the height and age, that do not invade
11 the person's privacy.

12 Q. Okay. So you agree that some of
13 the information collected and stored is age,
14 right?

15 A. There's an indication that in this
16 particular memory, the nickname memory -- that it
17 stores parameters such as the height and age of
18 the person.

19 Q. And do you see -- let's take a look
20 at Figure 8 of Doi.

21 And do you see this indicates
22 frequency of use, and then it's a bar graph that

1 has attraction for this attraction, the using
2 ages of it in a year?

3 A. Yes, I see that Figure 8.

4 Q. And if we look at Column 8 of Doi,
5 starting around Line 20, it talks about a use
6 data collector performing a variety of summations
7 based on collected use data?

8 A. Yes, I see that.

9 Q. And this indicates that this is
10 indicating the frequency -- use frequencies of
11 attractions by customer ages, right?

12 A. So it says that The use data
13 collector item number 3 sums use frequencies of
14 attractions by customer ages, as shown in
15 Figure 8, for example, which is the figure we
16 were just looking at.

17 Q. So that's indicating how often a
18 particular attraction is used by individuals of
19 different age groups, correct?

20 A. Yeah.

21 Figure 8, in particular, is
22 discussing attraction A, and it's talking about

1 the -- it's -- it's not talking, but it
2 illustrates the frequency of use of various age
3 groups of attraction A.

4 Q. Okay. Now, Doi also provides users
5 with recommendations to visit particular
6 attraction, correct?

7 A. So I seem to remember Doi making
8 recommendations about attractions, but the actual
9 decision of whether or not to attend an
10 attraction is made by the patron, from what I
11 remember.

12 But you can refer me to portions of
13 Doi that you want to discuss.

14 Q. Yeah. So if we go to, for example,
15 Column 9, Line 63, this gives an example of an
16 attraction A being crowded. And this indicates
17 that Doi's navigation planner 42 makes a plan to
18 recommend other attractions to some of the
19 customers queuing at that attraction that are
20 selected in consideration of their age.

21 Do you see that?

22 A. Yeah. The -- this is consistent

1 with the -- the statement that I just gave you
2 about my recollection -- recollection of what Doi
3 teaches --

4 Q. And if we --

5 A. -- ultimately, the -- the user or
6 the patron is making the decision as to which
7 attraction to -- to attend.

8 Q. So the -- the patron makes the
9 attraction -- the determination of which
10 attraction to attend, is what you're saying?

11 A. Yeah --

12 Q. But the --

13 A. -- the sentence is saying that
14 there are recommendations of -- of attractions to
15 make.

16 Q. So, the recommendation of which
17 attraction is done by the navigation planner,
18 right?

19 A. The navigation planner makes a plan
20 to -- for instance -- for example, as an
21 attraction A is crowded, the navigation planner
22 42 makes a plan to recommend other attractions to

1 some of customer queuing at the -- at the
2 attraction A that are selected in consideration
3 of the age.

4 Q. And we see an example of that in
5 Figure 11, and it's talked about at the top of
6 Column 10. For example, the user is presented
7 with a recommendation of attraction A is crowded;
8 attraction D (enjoyable for aged person) is not
9 crowded; how is it?

10 Do you see that?

11 A. Yeah, I see that the -- that the
12 navigation planner is making a recommendation.
13 And as I said before, it's the patron that
14 determines the attractions that -- and the
15 itinerary that the person is going to attend.

16 Q. So the -- the patron may ultimately
17 determine what they attend, but it's the
18 navigation planner that makes these
19 recommendations to do a certain attraction,
20 correct?

21 A. So the navigation planner is making
22 recommendations, and the -- the patron is

1 determining the patron's itinerary of attractions
2 to attend.

3 Q. Now, when -- the user did not
4 select attraction D here, correct? That was
5 recommended to them?

6 A. So this paragraph doesn't say
7 whether or not the user selected attraction D.

8 It does say that there's a
9 recommendation that if attraction A is crowded,
10 that -- there's not even a recommendation here.
11 It's in quotes. It's -- it's a -- it's just
12 mentioning that attraction D is not crowded --

13 Q. That would be --

14 A. -- so what's in -- what's in quotes
15 here is not really what I would consider
16 recommendations, just -- it's just some
17 information that's passed on to the patron.

18 Q. When a thought -- if we can go back
19 to the beginning -- or the last paragraph in
20 Column 9, doesn't that indicate that the
21 navigation planner is, in fact, making a plan to
22 recommend other attractions?

1 A. So earlier in the paragraph, it
2 does say that The navigation planner makes a plan
3 to recommend other attractions to some of the
4 customers queuing at attraction A.

5 But this particular message --
6 attraction A is crowded; attraction D (enjoyable
7 for aged persons) is not crowded; how is it,
8 question mark -- seems to be -- doesn't really
9 seem to be a recommendation to me. It seems more
10 like a -- just a statement and a question.

11 Q. So Doi gives other examples, too.

12 If we go to, for example,
13 Column 10, Line 20, do you see that it gives
14 another example of these recommendations for a
15 customer who's an infant; it notifies, through
16 the navigation planner, that attraction of
17 Pokekun is starting. There are seats yet; do you
18 want to reserve any?

19 Do you see that?

20 A. I see that.

21 What it doesn't say is a navigation
22 planner is selecting an itinerary for a patron.

1 Q. But you -- you don't disagree that
2 the navigation planner is suggesting, through
3 that message, for them to attend an attraction of
4 Pokekun that's starting now, correct?

5 A. This particular quote -- the
6 beginning of it is informing the patron that an
7 attraction of Pokekun is starting. And that --
8 so that's some information.

9 There's also information that's
10 saying there are seats yet. And then the next is
11 a question: Do you want to reserve any?

12 So it's a question to the customer.

13 Q. And if we look at the paragraph
14 right above that that's about Column 10, Lines 12
15 to 19, it issued that message because it was
16 select -- because it selected matching ages to
17 the attraction from ages of customers stored in
18 the use data memories; is that correct?

19 A. Hold on a second.

20 (The witness mumbles under his
21 breath while reviewing the
22 material provided.)

1 THE WITNESS: So in the previous
2 paragraph, it states, If, for example, a
3 popular attraction Pokekun to be held
4 still has nonreserved seats, there are
5 selected matches -- matching ages to the
6 attraction from ages of customer stored
7 in use data memories 14, and invitations
8 are given.

9 BY ATTORNEY HUGHES:

10 Q. So those invitations to attend
11 Pokekun are given without a customer specifically
12 requesting Pokekun, right?

13 A. So these particular paragraphs that
14 we've been reading from Column 10 discussing what
15 the navigation planner is doing -- it's not
16 discussing what the customer's doing.

17 Q. So the -- the navigation planner,
18 issuing the invitation to attend Pokekun,
19 correct?

20 A. So this portion of -- of Doi is --
21 is indicating actions that are taken by the
22 navigation planner, including -- it just says the

1 phrase "invitations are given."

2 Q. And then the next paragraph is an
3 example of the -- of that invitation, right?

4 A. So to me, what's in quotes is not
5 really an invitation; it's two statements and
6 then a question.

7 Q. And the question is?

8 A. Do you want to reserve any, which
9 is do you want to reserve any seats.

10 Q. And that would be an invitation to
11 reserve seats, correct?

12 A. I don't know if it's really an
13 invitation. I think it's more of a question.

14 Q. Okay. We can set Doi aside, I
15 think.

16 A. Okay.

17 ATTORNEY HUGHES: Do you want to
18 break now or in a little bit?

19 Can we go off the record?

20 THE WITNESS: Sure.

21 THE VIDEOGRAPHER: Going off the
22 record at 2:57 p.m.

--oOo--

(Whereupon, a recess was taken from
2:57 p.m. EDT to 3:09 p.m. EDT.)

--oOo--

THE VIDEOGRAPHER: We're back on
the record. And the time is 3:09 p.m.
You may begin.

BY ATTORNEY HUGHES:

Q. Okay. Dr. Gonsalves, do you still
have the '983 patent in front of you?

I can get you another copy.

A. I'm sure it's here. It's just a
matter of finding it in my pile.

Yes, it's in front of me now.

Q. Okay. Within the context of the
'983 patent, what is an attraction?

(Whereupon, the witness reviews the
material provided.)

THE WITNESS: So I can point you
to an example, for instance, at Figure 4,
because Figure 4 depicts a schedule form
shown on a display screen in accordance

1 with the principles of the present
2 invection -- invention showing the next
3 attractions in the itinerary for a party.

4 And then when you look at Figure 4
5 itself, it refers to attractions as, for
6 instance, a Water -- Water Park,
7 StudioWorld Tour, Wild West, T-Rex Ride
8 and a Flaminator, which indicates that
9 it's about how pyrotechnics are made for
10 movies.

11 So these are some of the exemplary
12 attractions that are -- that are
13 discussed in the '983 patent.

14 BY ATTORNEY HUGHES:

15 Q. And attractions can be other things
16 as well, correct?

17 (Whereupon, the witness reviews the
18 material provided.)

19 THE WITNESS: So, for instance, on
20 Figure 5, there's also a list -- an item
21 in the list about shopping that -- you
22 know, visiting a store to buy a souvenir.

1 BY ATTORNEY HUGHES:

2 Q. Anything else that can be an
3 attraction?

4 (Whereupon, the witness continues
5 to review the material provided.)

6 THE WITNESS: So there are also
7 some exemplary attractions listed on
8 Figure 10 in the left column.

9 There are numerous examples of
10 attractions given throughout the '983
11 patent.

12 BY ATTORNEY HUGHES:

13 Q. And as that term is used in the
14 claim, it's fairly broad, correct?

15 A. So, you know, I don't know what you
16 mean by "fairly broad."

17 I would think, in the context of
18 the patent, an attraction would be a physical
19 location that a patron would go to to experience
20 something or to watch something.

21 Q. And if we look at Claim 12 of the
22 '983 patent, this has a fairly extensive list of

1 what the different attractions could be, correct?

2 A. So, yeah, it does give a list in --
3 and then I would say my previous answer is
4 consistent with -- with this, because I said that
5 an attraction would be a physical location that a
6 patron would go to for some experience or to see
7 something.

8 And every single item that's listed
9 here with Dependent Claim 12 is an example of a
10 physical location.

11 Q. So, for example, for Show or Movie,
12 that would be the location where the show or
13 movie is being presented?

14 A. Yeah. I think in the -- you know,
15 this -- this patent is about you know, discussing
16 attractions at amusement parks, for example. And
17 so --

18 Q. But doesn't Claim 12 indicate the
19 attractions can be broader than just an amusement
20 park? For example, in there, there's a --
21 attract -- just generally attraction within a
22 city?

1 A. So that's true, but they're all --
2 each of these things listed in Claim 12 is a
3 physical location that a patron would go to.

4 Q. So for the Show and Movie, that
5 would be the physical location where that show or
6 movie is being presented?

7 A. Correct.

8 Q. Okay. If you can turn to Claim 25.

9 A. Okay.

10 Q. And do you see this says, Wherein a
11 portion of said data corresponding to a first
12 attraction of said first set of attractions is
13 representative of at least one member of the
14 group consisting of?

15 Do you see that?

16 A. Yes.

17 Q. So this claim is indicating types
18 of data about the attraction that can be
19 considered, correct?

20 A. Yeah. In particular, it says, A
21 portion of -- of the data corresponding to a
22 first attraction, which is in the first set of

1 attractions, is representative of at least one
2 member of the group that's listed here.

3 Q. So this data is describing features
4 of the attractions, right?

5 A. It doesn't say "features," but it's
6 saying -- it's describing data corresponding to a
7 first attraction.

8 Q. Okay. And some of that data that
9 corresponds to an attraction can be show time?
10 Do you see that in Line 6?

11 A. Yes, I see that.

12 Q. And in Line 9, the data could be a
13 duration, for example?

14 A. Correct. This would be like if
15 there's a theater on the premises that's showing
16 a movie, patrons could attend the theater. And
17 there would be a duration, for example, of the --
18 of the movie.

19 Also, it could be a duration of a
20 ride, for example, based on the context of this
21 patent.

22 Q. Okay. And then another example of

1 this data at Line 10 is a scheduling factor,
2 correct?

3 A. Yes. I see a scheduling factor
4 listed here.

5 ATTORNEY HUGHES: Okay. Thank
6 you, Dr. Gonsalves. I don't think we
7 have any more questions.

8 THE WITNESS: Okay.

9 ATTORNEY KESAN: I just have a
10 couple of follow-ups. It shouldn't take
11 very long.

12 --oOo--

13 EXAMINATION BY COUNSEL FOR PATENT OWNER

14 --oOo--

15 BY ATTORNEY KESAN:

16 Q. Dr. Gonsalves, can you just take a
17 look at Figure 10 in the '983 patent?

18 A. Sure.

19 Q. So what does Figure 10 show, to
20 you?

21 A. So Figure 10, on the left column,
22 has the names of attractions. And immediately --

1 Q. Do you want to take a quick look at
2 -- sorry, I didn't mean to interrupt, but can you
3 take a quick look at what Figure 10 is described
4 as in Column 10?

5 A. Sure.

6 ATTORNEY HUGHES: Which column was
7 that?

8 THE WITNESS: Ten.

9 ATTORNEY KESAN: Column 10,
10 Line 20.

11 THE WITNESS: Sure. It says that
12 Figure 10 illustrates an attraction
13 database representing attractions at an
14 exemplary facility of the map of
15 Figure 8.

16 So there's -- Figure 8 shows a map
17 of an exemplary facility containing nodes
18 and links representing the routes between
19 nodes. And Figure 10 is an attraction
20 database representing the attractions
21 that are -- that are shown in the map of
22 Figure 8.

1 BY ATTORNEY KESAN:

2 Q. So does that help you understand
3 Figure 10 better?

4 A. Yeah, I think so.

5 ATTORNEY HUGHES: Objection:
6 leading.

7 BY ATTORNEY KESAN:

8 Q. So what does Figure 10 show now?

9 A. So Figure 10, you know, would show
10 the -- the names of attractions. And the
11 attractions would correspond to, for instance,
12 nodes that are on Figure 8. And the links that
13 are shown in Figure 8 would be, you know, routes
14 between the various attractions.

15 And also, Figure 10 shows an
16 attraction description. For example, for the
17 attraction named Water Park, the attraction
18 description is Stunts and Hydrotechnics.

19 And then the two most columns --
20 the two columns to the right of that are
21 Scheduling Factors and Acceptance Factors. And
22 the acceptance factors are various

1 characteristics, for instance, you know, the
2 amount of violence; loudness, which would be the
3 amount of sound; whether you can get wet; whether
4 the -- an attraction is for kids; whether there's
5 a height limit, things of that nature.

6 Q. And you want to tell us a little
7 bit about the third column you have there, the
8 Scheduling Factors?

9 A. So -- yeah. There are other
10 scheduling factors that are shown there,
11 including the entry node, which is, you know, the
12 -- and a representation of where you would enter
13 that particular attraction. There's an exit
14 node, which is a representation of where you
15 would exit the attraction.

16 On some of these attractions, for
17 instance, the Water Park, the entry and the exit
18 node would be the same.

19 There's also scheduling factors
20 associated with the show time, the duration and
21 the queue. So there are various scheduling
22 factors listed in that middle column of

1 Figure 10.

2 Q. So do you see in the names of the
3 attractions on the left-hand side -- do you see
4 anything there, like lunch?

5 A. No.

6 Q. Now would you go to Figure 5 and
7 take a look at the description for Figure 5?

8 (Whereupon, the witness reviews the
9 material provided.)

10 THE WITNESS: So the description
11 of Figure 5 -- it depicts a schedule form
12 with the last attractions to the
13 itinerary scrolled into view. So it's
14 indicating that there's a schedule form
15 and it's scrollable.

16 And in Figure 5, the last
17 attractions are in the view shown, which
18 makes sense because, you know, for
19 instance, the last one is at time 5:00.
20 So -- and the first one on this is at
21 time 10:22. So it's -- it gives an
22 indication that prior to this on the

1 list, there may have been other items,
2 but this is scrolled down, as indicated
3 in Figure 5 --

4 BY ATTORNEY KESAN:

5 Q. So in Figure 5, you -- do you see
6 some attractions?

7 A. So, for example, if you look at
8 Figure 10, the first attraction name listed is
9 Water Park. And so -- and the first entry on
10 Figure 5 is Water Park.

11 Q. So that would be an example of an
12 attraction?

13 A. Correct.

14 ATTORNEY HUGHES: Objection:
15 leading.

16 BY ATTORNEY KESAN:

17 Q. And do you see certain other breaks
18 in there with square brackets on either side,
19 about three of them, in Figure 5?

20 A. Yeah, I see some of these --
21 these -- these things are bracketed.

22 Q. All right. And what does that mean

1 to you?

2 A. So I guess this would be
3 distinguishing what's an attraction from what is
4 something other than an attraction, like, you
5 know, it's a lunch break, for example. As -- in
6 addition, 5:00 is the time where you meet the
7 tour bus at the specified departure.

8 So I wouldn't characterize a tour
9 bus as an attraction. That's just something you
10 get on to go home after you spent the day at the
11 -- at the facility.

12 So I think the -- the brackets are
13 used to distinguish -- in the absence of
14 brackets, they're -- they're attractions at the
15 theme park, for example. And if there's brackets
16 just indicating what you would do with that
17 particular time, it's not necessarily an
18 attraction.

19 ATTORNEY KESAN: Thank you,
20 Dr. Gonsalves.

21 THE WITNESS: You're welcome.

22 ATTORNEY HUGHES: No questions.

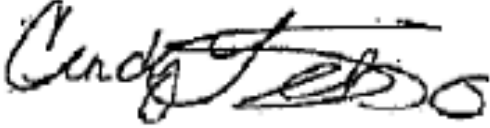
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

THE VIDEOGRAPHER: This concludes
the deposition. And the time is
3:25 p.m.

(Witness excused.)

(Deposition concluded at 3:29 p.m. EDT.)

C E R T I F I C A T E

1 I, Cindy L. Sebo, Nationally Certified Court
2 Reporter herein, do hereby certify that the
3 foregoing deposition of GREGORY JOSEPH GONSALVES was
4 taken before me pursuant to notice at the time and
5 place indicated; that said witness duly swore to
6 tell the truth, the whole truth, and nothing but the
7 truth under penalties of perjury; that said
8 testimony of witness was correctly recorded to the
9 best of my abilities in machine shorthand,
10 thereafter transcribed under my supervision with
11 computer-aided transcription; that deposition is a
12 true and accurate record of the testimony given by
13 the witness; that I am neither counsel, nor kin to
14 any party in said action, nor interested in the
15 outcome; and that a copy of this transcript obtained
16 from a source other than the court reporting firm,
17 including an adversary or co-counsel in the matter,
18 is  trial.

19 CINDY L. SEBO, RMR, CRR, CLR, RPR, CCR, CSR,
20 RSA, CA CSR 14409, NJ Certified CR 30XI0024460,
NJ Certified RT 30XR00019500, NM CSR 589, NY
21 Realtime Court Reporter, NY Association Certified
Reporter, OR CSR 230105, TN CSR 998, TX CSR
22 12778, WA CSR 23005926, Notary Public

INSTRUCTIONS TO WITNESS

1 Please read your deposition over
2 carefully and make any necessary corrections.
3 You should state the reason in the appropriate
4 space on the errata sheet for any corrections
5 that are made.

6 After doing so, please sign the
7 errata sheet and date it.

8 You are signing same subject to the
9 changes you have noted on the errata sheet, which
10 will be attached to your deposition.

11 It is imperative that you return
12 the original errata sheet to the deposing
13 attorney within thirty (30) days of receipt of
14 the deposition transcript by you. If you fail to
15 do so, the deposition transcript may be deemed to
16 be accurate and may be used in court.

CAPTION: Walt Disney Parks vs. Agile Journeys LLC
GREGORY JOSEPH GONSALVES NO. 6883727

E R R A T A S H E E T

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

CAPTION: Walt Disney Parks vs. Agile Journeys LLC
GREGORY JOSEPH GONSALVES NO. 6883727

E R R A T A S H E E T

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

PAGE_____ LINE_____ CHANGE _____

REASON FOR CHANGE:

ACKNOWLEDGMENT OF WITNESS

I, GREGORY JOSEPH GONSALVES, do hereby
 certify that I have read the foregoing pages herein,
 and that the same is a correct transcription of the
 answers given by me of the proceedings taken
 remotely to the questions therein propounded under
 penalty of perjury, except for the corrections or
 changes in form or substance, if any, noted in the
 attached errata sheet.

DATE

SIGNATURE

Subscribed and sworn to before me
 this ____ day of _____, 20____.

My Commission expires:

Notary Public

JAY P. KESAN, PH.D., ESQUIRE

jay@keyiplaw.com

September 23rd, 2024

RE: Walt Disney Parks And Resorts U.S., Inc v. Agile Journeys LLC

9/19/2024, Gregory Joseph Gonsalves , PH.D. (#6918872)

The above-referenced transcript is available for
review.

Within the applicable timeframe, the witness should
read the testimony to verify its accuracy. If there are
any changes, the witness should note those with the
reason, on the attached Errata Sheet.

The witness should sign the Acknowledgment of
Deponent and Errata and return to the deposing attorney.
Copies should be sent to all counsel, and to Veritext at
cs-midatlantic@veritext.com.

Return completed errata within 30 days from
receipt of testimony.

If the witness fails to do so within the time
allotted, the transcript may be used as if signed.

Yours,

Veritext Legal Solutions

&	1000 61:14	13 132:12,14	1987 27:19
& 45:6,8,8,14 45:16,21 47:1 47:3 49:12,17 50:18	1001 5:15 67:20,22 1005 5:16 148:11,12 1006 5:17 162:16,17 1007 5:18 131:20,22	133:2 144:7 145:6,8,15 131 4:8,13 5:18 1372 189:19 14 132:11,14 133:1,11 135:14 136:11 136:18 138:18 141:8 142:15 142:21,22 143:11 145:14 173:7 14409 1:18 2:10 189:20 148 5:16 15 154:10,11 16 121:14 122:3,8 162 5:17 168 25:20 17 160:16 18 160:5 181 4:9 189 4:14 19 1:15 4:5 5:5 6:6 160:5 172:15 190 4:15 191 4:16 193 4:17 1934 3:16 1982 27:13 1983 33:12 36:1,12	1991 27:21 1997 31:21 33:12 36:1,12 45:4 1:02 130:11,13 1:53 131:2,12 1a 164:21
0			2
0 128:18,21,22			
1			
1 5:10 6:19 23:2 34:7 61:4 61:16 62:4 69:3 76:7,10 76:17,19,20,21 77:14 78:12 79:21 82:1 83:1,2,5 85:10 86:2,5,12 91:22 92:16,17 92:21,21,22 93:21 123:8 124:12,13 125:2 127:15 128:5,12 129:9 10 128:18,21,22 129:9,13,17 140:16,22 143:1,7 169:6 171:13 172:14 173:14 177:8 181:1,17,19,21 182:3,4,9,12,19 183:3,8,9,15 185:1 186:8	101 144:19 102 139:17 144:10,20 145:12 146:4,8 148:9 10:08 1:15 2:18 6:6,11 10:22 185:21 10:24 23:12 10:27 23:18 11 24:3,6 163:19 164:22 165:7 169:5 11:20 66:19,22 11:36 66:22 67:3 12 102:9,10,15 107:9 111:2 172:14 177:21 178:9,18 179:2 1200 122:16 1244 103:14 1245 103:12 12778 1:20 2:15 189:22		2 62:19 144:15 144:16,17 146:6 158:10 158:13 20 66:12 133:13 143:11 166:5 171:13 182:10 193:15 20001 2:4 20004 3:8 2009 15:8 16:12 24:1,7 52:12 201 133:3 134:11 135:16 144:13,22 146:5,7,15 148:2,9 2010 50:12 2013 50:12 202.637.3659 3:9 2020 60:19 2024 1:15 4:5 5:5 6:6 194:3

209 138:1,4 139:21 141:14 21 93:17 164:9 164:13 165:3 22 149:6,8 160:6,16 22182 3:17 23 137:20 138:16,19,20 150:3,9,14 151:6 154:14 157:8 161:13 23005926 1:20 2:16 189:22 230105 1:20 2:15 189:21 23rd 194:3 24 141:7 143:11 157:15 158:11 160:6 25 160:13 179:8 26 160:13 27 160:16 28 53:12,15 100:2 104:6 121:13 122:3,7 123:12 124:1 129:2,11 29 54:10 165:4 2:57 174:22 175:3	3	34 72:9 151:22 152:3 154:9,11 35 24:10,11 100:2 104:6 350 3:16 36 24:18 104:6 37 100:2 133:5 144:8 145:6,9 370 34:8 3:09 175:3,6 3:25 188:3 3:29 188:7 3d 87:13 88:2,4 92:3	157:3 501 132:16 144:9 145:7,13 146:3 53 98:6 114:4 115:9,14,17 140:17 540 135:16 146:16,21 541 146:17 148:4 542 135:19 543 135:19 55 141:2,13 555 3:7 562 136:15,22 137:8 563 137:4,7 57 100:21 589 1:19 2:13 189:20 5:00 185:19 187:6 5b 132:21 133:3,4,5 134:11 135:17 146:16,22 148:3 5c 136:12 5th 115:13
	3 83:13,19,21 84:2,6,16,21 85:9,18,20 86:2,5,11,13,17 87:4,5,11,17,19 88:10,14 89:13 92:7,16,17,20 92:22 93:2,21 123:9 124:12 124:13 125:3 127:15 128:5 128:13 137:21 138:19 150:16 151:7,22 166:13 3.c 83:14 84:11 87:13,20 30 149:11 190:13 194:16 30xi0024460 1:19 189:20 30xi00244600 2:11 30xr00019500 1:19 2:12 189:20 31 69:16 70:5 72:9 82:21 86:1 129:2,11 160:10 32 83:15 157:8 160:10 161:14 33 88:7	4 4 133:4 175:20 175:21 176:4 42 129:2 167:17 168:22 420 139:20 46 136:14,21 47 136:13 137:3 4a 165:8 4c 165:8 5 5 102:20 151:22 164:9 164:13 165:2 176:20 185:6,7 185:11,16 186:3,5,10,19 50 98:6 114:4 115:9,13,17	6 6 98:6 114:4 115:8,13,17 116:14 121:13 122:3,8 124:2

180:10 60 157:4 601 2:3 62 5:10 157:4 63 167:15 67 5:15 90:22 91:5,11 68 93:19 98:17 6883727 1:22 191:1 192:1 69 99:7 6918872 194:5	165:20 166:3,4 166:15,21 182:15,16,22 183:12,13 88 91:12,12,14 93:3,7,14 99:8 89 91:15 94:13 96:20 97:5 98:22	177:22 181:17 998 1:20 2:15 189:21	81:21 82:16 84:20 95:17,19 96:8 157:11 159:11 161:16 175:22
	9	a	accumulated
7	9 4:8 52:11 160:13 167:15 170:20 180:12 9/19/2024 194:5 90 91:15 119:12 120:7 120:16,17 126:16 127:1 983 10:15 22:12 28:9 29:4,18,20 31:13 35:10 51:4 56:8,9 67:7,9,15,18,21 68:13 69:1,3 69:16,18 70:6 70:13 74:20 76:5 83:15,20 88:6 96:7,8 98:7 100:1 112:8 117:6,16 118:19 119:7 175:10,16 176:13 177:10	a.m. 1:15 2:18 6:6,11 23:12 23:18 66:19,22 66:22 67:3 abilities 189:9 able 76:12 above 52:22 164:17,17 172:14 194:6 absence 187:13 abstract 28:14 28:21 68:17 149:3,5 accept 74:13,22 acceptance 100:14,19 101:12 102:2 103:3,8,10,16 104:8 105:21 106:14,16,20 107:5,9 108:10 119:18 183:21 183:22 accepting 74:18 access 77:16 149:20 152:11 152:14,18 153:5,8,20,22 accordance 16:20 80:20	accuracy 194:9 accurate 26:21 51:12 66:4 84:12 87:16 189:12 190:16 accurately 11:1 14:6 26:4 acknowledg... 4:17 193:1 194:12 acquired 32:16 33:9 36:4 acting 51:17 action 7:14 189:14 actions 173:21 activities 41:15 actual 49:6 154:16 155:2 155:14 156:2 167:8 actually 40:11 40:11 47:22 48:5 49:6 59:14 65:18 120:16 adapted 165:8
8			
8 62:17,21 63:1 88:5,8,9,12,14 88:16,20 89:6 89:12,13 90:6 150:4 160:6			

adding 90:11 addition 41:12 104:21 109:12 120:1 123:16 187:6 additional 119:21 adds 89:7,15,17 90:1,3,8 adjusted 140:3 administer 7:12 administrative 13:21 50:14 administrator 2:9 adt 60:17 61:6 63:9,12 adt's 63:17 advance 65:13 adversary 189:17 affiliations 7:22 affinity 101:5 afternoon 4:13 158:19 159:2 afternoons 38:16 age 152:1,8,22 165:5,10,13,17 166:19 167:2 167:20 169:3 aged 169:8 171:7	ages 166:2,11 166:14 172:16 172:17 173:5,6 agile 1:7 4:4 5:4 7:1 8:6 12:20 17:2 18:7 19:4 51:14 191:1 192:1 194:4 ago 20:7 61:2 agree 6:18 54:1 54:4 92:15 115:16 124:10 141:17 143:15 144:12 145:21 146:9 147:17 151:2 161:1,14 165:12 agreed 23:22 53:13,22 63:12 109:4 145:5 ahead 23:9 162:3 aided 189:11 air 34:18 35:9 35:15 55:17 alarm 47:13 48:3 alarms 47:21 algorithm 30:18 157:11 159:6,11 161:16 algorithms 34:18 35:5,9	allocating 42:4 allotted 194:19 allow 152:11 152:14 153:5 158:19 159:3 allowed 152:18 153:8 160:7 allowing 149:20 allows 136:16 136:22 137:4 153:20 alls 125:14 alluring 98:19 99:10 100:7 101:19,19 103:17 108:15 alternate 54:5 american 1:1 amount 184:2,3 amusement 29:22 31:16 178:16,19 analyzing 54:19 55:1,5 55:11 andrew 13:4 answer 11:8,14 14:5 15:12 17:22 41:3 50:4 51:12 52:8 59:2 78:11 81:18 82:11 84:18 87:16 178:3	answer's 22:11 answered 105:13 109:22 answering 11:12 answers 118:2 193:5 anticipated 24:13 anticipation 24:10 appeal 1:2 21:12,13 50:11 appeals 51:19 52:6 56:21 57:4 appear 66:1 appearance 7:18 appearances 7:21 appeared 93:12 appears 89:2 applicable 194:8 applicant's 60:10 applicants 119:13 application 42:9,10 43:4 43:11 48:9 applications 21:9 42:15 46:12 54:20
--	---	---	--

55:2,7,12,14 applied 60:17 60:18 61:5 63:7 approach 65:13 appropriate 63:14 122:21 190:3 appropriately 64:11 approximately 2:18 aquariums 164:1,6 arbitration 1:1 architect 13:19 argument 63:4 arguments 63:17 arises 65:19 arrival 150:19 art 24:21 25:2 52:16,20 53:8 53:10,14 54:8 aside 162:1 174:14 asked 14:17 18:2,13,17 22:6,12 51:3 54:3 95:12,14 96:4,5 asking 106:9,10 121:18 128:10	assembler 34:8 assignment 22:14 assisting 52:4 associate 45:5,7 associated 29:18 34:14 42:13 43:8 44:1 47:21 48:8 184:20 association 1:1 1:19 2:14 89:7 89:18 90:9 189:21 assume 12:16 115:9 assuming 15:6 127:15 assure 10:2 attached 190:10 193:9 194:11 attachment 25:19 32:9 attend 167:9 168:7,10 169:15,17 170:2 172:3 173:10,18 180:16 attendance 154:16 155:2,5 155:7,10,15 156:3	attendees 158:18,20 159:1,4 attorney 4:8,9 8:1,2,5 9:4 12:11 13:22 20:3,9,17 23:3 23:5,20 45:12 49:15,18 50:20 51:1 61:3,15 62:10 64:19 66:11,15,16 67:5 68:2,4,6,7 68:10,12 72:7 72:10,11,19 83:17,19,21 84:1,3,4 91:9 113:19 114:17 117:10 127:11 129:6 130:8 131:17 132:2 147:3 148:14 158:9 162:8,14 162:19 173:9 174:17 175:8 176:14 177:1 177:12 181:5,9 181:15 182:6,9 183:1,5,7 186:4,14,16 187:19,22 190:13 194:13 attorneys 3:2 3:13 46:5,6,7	attract 150:20 178:21 attraction 70:1 70:9,18 71:13 71:17,19 72:1 72:3,14,21 73:3,15,19,21 74:6,9,12,17 75:17 77:11 78:18,22 79:14 80:12 81:6,14 82:7,20 85:6 88:18,22 89:3 89:8,19 90:10 90:12,14,15,17 100:11,13,17 100:19 101:10 101:21 102:2 105:20,21 106:13,13,16 107:21 108:8 119:18 126:6,7 126:8,14 129:13,18 136:7 144:18 164:5 166:1,1 166:18,22 167:3,6,10,16 167:19 168:7,9 168:10,17,21 169:2,7,8,19 170:4,7,9,12 171:4,6,6,16 172:3,7,17 173:3,6 175:16
---	---	---	--

177:3,18 178:5 178:21 179:12 179:18,22 180:7,9 182:12 182:19 183:16 183:17,17 184:4,13,15 186:8,12 187:3 187:4,9,18 attractions 29:22 31:14 68:21 69:6,7 69:12,12,14 75:6,11,12,21 77:2,5,6,20,21 78:3,6,7,10,14 79:4,7,8,10,19 79:22 80:2,6,8 80:17 81:1,1 81:10,12 82:3 82:4,10 83:6,7 83:12 84:9,10 84:14,22 85:1 85:3,9,21,22 86:4,8,16,16,18 86:20,21 87:7 87:8 88:17,19 89:1,4 90:16 90:18 101:6,8 124:7,18 125:5 125:20,20,22 126:1,3,10,15 127:19 133:17 134:6,13,16,18 134:21 135:1,3	135:7,12,18,21 136:4 142:16 143:2,13,21 144:1 145:17 146:18 147:2,6 147:13,21 148:4,6,7 151:13,15 152:17 154:20 156:20,22 164:2 166:11 166:14 167:8 167:18 168:14 168:22 169:14 170:1,22 171:3 176:3,5,12,15 177:7,10 178:1 178:16,19 179:12 180:1,4 181:22 182:13 182:20 183:10 183:11,14 184:16 185:3 185:12,17 186:6 187:14 audible 11:14 audio 6:16 authorized 1:21 2:17 7:12 automate 30:6 automated 28:12 34:14 automatically 160:18	automating 29:5 automation 28:16 available 43:14 43:18,21 91:3 129:20 135:18 137:5,9,11,16 137:18 141:3 141:15,18 142:3,6,11 143:9 146:18 147:2 148:4 194:6 avenue 2:3 aversion 98:11 98:14 110:16 111:6 114:11 115:20 avoid 11:11 140:3 awake 162:11 162:12,13 aware 14:20 59:20 118:21 b bachelor's 19:22 27:11 back 18:14 23:17 36:20 45:3 51:10 53:6 56:12 67:2 126:16 131:11 133:10 143:11 145:8	145:14 161:13 170:18 175:5 background 46:10 163:22 164:5 backwards 32:6 bad 35:19 ballpark 15:14 bar 165:22 based 21:15 93:11 101:13 105:14 109:14 141:17 166:7 180:20 basis 129:8 beating 47:17 beeping 47:19 beg 118:6 beginning 2:18 7:22 37:11 69:4 87:5 88:4 88:11 126:19 129:11 133:2 138:19 141:13 150:9 170:19 172:6 begins 91:12 124:2 137:22 138:1 164:20 behalf 2:19 believe 18:6 37:22 43:2 51:13 54:11 62:15 65:16
---	---	--	---

81:22 91:21 93:16 109:3 118:20 bench 65:13 best 129:13,18 129:19 189:9 better 130:2,4 130:7 183:3 beyond 127:8 bit 13:10 34:16 154:13 164:16 174:18 184:7 block 49:12,17 board 1:2 21:12,13 50:11 93:8,13 94:10 94:10,15 96:19 board's 93:4,12 93:19 95:2 96:9 bottom 32:13 54:17 149:10 box 145:3 bracketed 186:21 brackets 186:18 187:12 187:14,15 break 66:14 174:18 187:5 breaks 186:17 breath 172:21 broad 177:14 177:16	broader 178:19 brought 9:20 building 36:10 45:11 bullet 98:16 99:6,8,16 100:4 101:9 102:4,5 107:22 108:7 117:21 120:16 126:19 127:2,10 bulleted 97:4,6 bus 187:7,9 business 57:2 button 136:15 136:22 137:4,7 137:8,8 buttons 135:19 136:2 buy 176:22	canceling 133:8 capable 143:12 capital 60:17 60:19 61:5 139:7 140:2 capital's 63:7 caption 191:1 192:1 card 164:22 cardioverter 47:14 care 162:5 career 26:11 55:15 carefully 190:2 case 1:10 7:3 11:22 12:3 51:6 53:8,12 58:4 59:22 60:16,19 61:2 61:6 62:12 63:10 66:7 67:17 88:3 cases 46:11 57:16,18,20,21 58:1,6,9,11,14 58:22 59:5,15 62:14 66:8 cautionary 65:7 ccr 1:18 189:19 certain 29:10 29:10 30:9 31:12 42:1 128:6,13	149:20,21 152:7 153:15 156:11 169:19 186:17 certainly 113:20 certificate 4:14 certified 1:18 1:19,20 2:6,6,8 2:8,11,12,13,14 8:11,15 23:8 61:10,22 131:7 189:1,20,20,21 certify 189:2 193:3 change 26:13 191:3,4,5,6,8,9 191:10,11,13 191:14,15,16 191:18,19,20 191:21 192:3,4 192:5,6,8,9,10 192:11,13,14 192:15,16,18 192:19,20,21 changed 32:21 36:11,14 45:11 changes 190:9 193:8 194:10 characteristics 184:1 characterize 187:8 characterized 119:16
	c		
	c 3:1 6:2 34:8,8 84:2,6 189:1,1 ca 1:18 189:20 caffeine 162:9 calculates 155:4 calculating 154:15 155:1 155:14 156:2 california 2:10 call 21:18 called 24:4 36:5 42:5 47:14 131:5 139:1		

charges 51:8 53:4	76:7,10,17,19 76:20,21 77:3	177:21 178:9 178:18 179:2,8 179:17	close 135:4
charging 51:13	77:14,15,17,18		clr 1:18 189:19
check 51:10 98:4 137:11 140:11	78:2,5,8,12,19 79:3,3,6,8,15 79:20,21 80:3	claimed 24:19	code 26:20 34:7 43:20 44:19
checking 140:8	80:5,7,14,15	claims 76:4 80:20 81:20	collected 165:13 166:7
checks 139:10 139:21	81:7,9,10,16,22 82:1 83:1,2,5,8	82:12,16,18 84:19 85:11,14	collectively 115:2
chest 48:3	83:13,14,19,21	86:5 91:20	collector 166:6 166:13
children 102:22	84:2,6,16,17,21 85:9,10,18,20	92:16 93:21 95:14,17	colon 93:9
choosing 44:10	86:2,2,5,11,12	104:22 106:6	columbia 3:6
cindy 1:18 2:5 7:10 189:1,19	86:13 87:2,4,5 87:11,17,19	109:16 110:9 114:2 120:18	column 62:19 68:8 69:15 70:5 72:8 78:16,20 79:11 81:3 82:21 83:15 85:4,22 88:7 98:6 100:2 102:15 103:7,11,11,13 104:6 114:4 115:8,17 116:1 116:5,14 121:13,21 122:3,7 123:12 124:1 129:2,11 132:11,14 133:1,4,11 135:14 136:11 136:18 137:20 138:16,18,20 140:16,22 141:8 142:15 142:22 143:1,1
circuit 28:22 30:13,15 51:19 52:6 56:21	88:5,8,9,10,12 88:14,14,16,20 89:6,12,13,13 89:20 90:6,14 91:22 92:3,7 92:10,17,17,20 92:21,21,22	121:4 124:8,11 124:12,13 125:2,8,11 127:12,14,15 127:16 128:5 128:12	
circuits 28:13 28:18 29:6 30:7,7 34:15 55:22	93:1,2,2 94:12 102:6 104:18 105:9,15 106:5 109:15 110:8 112:9 113:14 116:3 117:8,18 118:11 120:21 121:5,9,11,20 122:2 123:7,8 123:9 124:11 125:19 126:4 126:13 127:22 142:21 177:14	clarification 11:7	
circumstances 161:12		classes 38:15	
cite 83:18 93:15		clear 14:12 118:8 138:15 141:9 142:20	
cited 112:8 115:22 117:6 118:19 119:8 121:14 123:17 146:4		clearance 34:21 42:21	
cites 113:11		clearly 42:19 97:8 110:14,14 161:19	
citing 53:8		client 39:19 44:18,21,22	
city 178:22		clients 37:16,18 37:21 50:8	
claim 24:12,19 69:3,10 75:10			

143:7,11 144:7 145:6,8,14 160:5,6,10,13 160:16 164:9 164:13 165:2 166:4 167:15 169:6 170:20 171:13 172:14 173:14 177:8 181:21 182:4,6 182:9 184:7,22 columns 103:9 141:7 183:19 183:20 combination 48:12 come 43:4 54:5 comes 89:21 coming 48:4 commission 193:17 communication 76:11 companies 32:3 33:12 35:22 43:1 company 42:18 comparison 29:1 compensated 51:6 53:2 compensation 51:7 complete 38:18 108:21	completed 140:7 194:16 components 30:8,12 comprise 88:17 comprised 69:19 73:14 74:5,16 75:16 77:10 78:16,21 79:13 80:11 81:4,13 82:6 83:10 85:5 comprises 69:11 75:10 77:4 79:9 80:1 80:7 81:11 82:4 83:7 84:14 85:2 86:20 88:21 comprising 69:6 78:14 87:7 computer 19:22 27:22 29:9,15 76:12 76:13 77:15,19 78:9 83:16 84:8 144:18 150:5,16 151:7 151:19 157:9 159:6,9,13,18 161:14,19,19 189:11 computing 28:15 29:11	30:10,17 31:4 120:9 122:9 127:3 concept 80:19 concepts 24:4,9 concluded 188:7 concludes 188:1 conclusion 94:11 conclusions 65:2 conduct 60:1,7 61:1 62:16 65:14 confidential 43:2 configuration 40:14 confirm 29:2 83:1 94:6 conflict 140:1,4 140:14 conflicting 140:9 connection 9:13 31:7 consider 20:11 20:14,22 21:19 35:8 55:10 95:8 97:21 98:2 99:2 106:21,22 109:1 110:6	170:15 consideration 167:20 169:2 considered 18:7 20:16 53:9 94:3,16 96:12 107:11 179:19 considering 79:16 109:2 consistent 118:19 156:13 167:22 178:4 consisting 125:22 179:14 constrain 60:1 constraints 35:1,4 60:5,12 60:20 constructing 129:8 construction 97:19 118:16 118:20 122:2 123:13 construe 121:4 construed 80:20 81:20 82:16 85:14 95:17 97:16 104:13,14,22 106:6 110:9 121:10,12,20 127:22 128:3,5 128:13
--	--	---	--

consultation 122:20	coordination 35:21	90:5 91:5,20 91:21 92:16	189:8
containing 182:17	cope 157:11 159:11	103:6 105:6 109:5 124:9,16	correspond 183:11
contention 63:9	copies 194:14	125:10 129:15	corresponding 88:18,22
contents 140:6	copy 9:20 10:5 23:4 25:15,22	132:22 133:22	179:11,21
contested 51:15 51:16,18 53:5	67:19,21 68:3 90:19 132:3	134:3,14 135:5 135:13 136:7	180:6
context 95:11 95:15 96:7 161:8 175:15 177:17 180:20	148:15 162:20 175:11 189:15	136:17 138:6 138:12 140:10 141:5,19	corresponds 180:9
continue 6:17	corporation 60:17 61:6	144:13 145:7 148:21 149:3	counsel 1:20 2:16 8:3,17 9:2 11:8 12:20,21 17:2 18:6 19:4 51:17,22 52:3 52:7 57:7,12 57:15 68:2 72:7 131:15 181:13 189:13 189:17 194:14
continued 131:5,15	corral 98:9 114:9 115:19	150:2,13 151:4 152:2,19 153:3 153:13 154:4 154:21 155:6 156:7,20 158:12 159:7 159:14 161:17 163:7 166:19 167:6 169:20 170:4 172:4,18 173:19 174:11 176:16 177:14 178:1 179:7,19 180:14 181:2 186:13 193:4	counsels 7:19 counting 157:4 couple 11:4 13:9 21:10 93:10 127:1 181:10
continues 91:14 117:3 177:4	correct 9:18,19 10:10 15:9 16:3,4,18 17:9 24:5,16 25:2 27:9,10,13 28:1,7 31:19 31:20 32:11,15 33:14 38:12 45:6,13 46:3 46:18 49:12,13 50:13,16,19 53:16 54:12 56:14,21,22 57:3 58:10,12 72:10,22 73:11 73:22 74:13 75:8 76:1 77:2 77:22 79:19 83:16 87:2 88:10 89:15	corrected 19:5 corrections 190:2,4 193:7 correctly 70:12 89:12 94:7 100:16 152:11 153:6,20 154:1	course 20:5 court 1:19 2:5 2:8,11 7:9 11:14 52:3,8 52:10 60:1 63:12,17,20 65:9 189:1,16 189:21 190:16
contractor 36:5			cover 17:11 113:19
contrasting 116:11			
control 30:9 34:18 35:9,15 55:17			
controlling 150:5,15 151:6 157:9 159:5,9 159:18 161:14 161:19			
convenient 129:8			
conversations 6:14			
coordinate 37:7 41:15			

covered 57:2 cr 1:18 189:20 create 28:17 created 28:20 39:21 53:20 96:18 creating 68:14 68:19 134:22 148:7 crosstalking 61:18 crowded 167:16 168:21 169:7,9 170:9 170:12 171:6,7 crr 1:18 189:19 cs 194:15 csr 1:18,18,19 1:20,20,20,20 2:13,14,15,15 2:16 189:19,20 189:20,21,21 189:21,22 current 133:20 135:10 138:11 139:2,8 144:3 147:15 currently 50:17 custom 163:14 customer 163:17 164:11 164:18,20 165:4 166:11 166:14 169:1 171:15 172:12	173:6,11 customer's 165:9 173:16 customers 167:19 171:4 172:17 customized 69:9 75:13 77:6 cv 25:22 26:4,7 26:10,12 27:8 45:4 56:12 62:13	166:12 172:18 173:7 179:11 179:18,21 180:3,6,8,12 181:1 database 122:16 150:6 150:16 151:8 151:11 182:13 182:20 databases 151:4 date 62:6 190:7 193:11 day 12:1 38:15 45:6,9 47:1,3 49:11 187:10 193:15 days 15:19 16:10 67:16 190:13 194:16 deals 45:10 decades 21:10 deceive 60:8 decide 61:20 decision 93:5,8 93:13,14,17,20 94:9,10 95:3 96:10,11,17,17 96:18 167:9 168:6 declaration 9:21 10:6 14:2 14:4,21 15:3,5 15:7,22 16:1,6	16:12,14,16,20 17:4,6,8,16 18:8,21 19:3,8 19:11,15,17 22:19 23:2,22 24:3 25:16,19 52:12 59:18,22 90:20 91:1 93:4 97:1 98:6 98:17 99:1,8 103:19 106:3,4 106:10 107:14 108:20 109:13 110:1 111:12 113:12 117:15 119:8 120:7 121:9,14,15,17 126:17 128:9 128:16 132:8 148:21 159:21 162:22 declarations 9:14 13:18,18 15:5 16:21 58:16 decline 74:13 74:22 declines 75:6 75:22 declining 74:18 deemed 190:15 defense 36:5 42:20 defer 65:17
	d		
	d 6:2 86:17 89:6,12 92:7 169:8 170:4,7 170:12 171:6 d.c. 2:4 3:8 6:5 7:6 dash 99:18 103:22 data 30:9 31:8 77:16 86:21 88:16,21 92:1 92:4,8,18 93:22 100:11 100:17 101:10 101:21 105:20 106:13 107:21 108:8 120:22 124:7,18 125:5 126:1,9 127:16 127:18,18 139:20 166:6,7		

definition 18:11 53:13,16 53:19,20 54:1 54:6,7,9,12,14 76:3 94:2,16 96:12	11:4,20 12:9 12:15 57:22 59:1,6 62:3 67:22 128:8 131:22 148:12 162:17 188:2,7 189:3,11 190:1 190:10,14,15	designed 35:5 37:9,13 39:21 designer 34:3 41:14 119:15 122:20 designers 41:7 44:16 designing 30:11 37:4,10 37:19 40:2 54:19 55:1,6 55:11	122:10 127:5 determines 138:4,21 141:3 141:14 142:2 169:14 determining 53:9 119:15 120:19 125:2 141:18 142:6 143:8 170:1 develop 37:6 39:17 41:8 44:18 47:21 developed 30:17 34:7 35:5 37:12,13 developer 34:4 38:5,7 41:14 43:11 44:9 developers 41:8,16 44:17 developing 37:4,20 38:11 39:15 41:18 43:18 44:4,13 54:20 55:1,6 55:11,21 development 26:18 33:18 39:3,10 40:21 43:5,7 46:21 49:9 device 30:10 47:14 48:8 132:22
definitions 20:14 96:4,5 degree 20:1 27:11,15 31:18 124:5 department 42:20 departure 187:7 depend 141:20 dependent 122:14 178:9 depending 36:14 43:6 158:15 depends 88:14 89:13 depicts 175:21 185:11 deponent 8:7 194:13 deposed 9:13 14:20 25:4,7 58:5,19 59:2,3 59:9,13,16 deposing 190:12 194:13 deposition 1:13 2:1 5:8 6:20	described 69:1 77:1 104:11 121:13,21 141:5,16 182:3 describes 40:4 68:13 100:3 describing 83:11 113:1 114:22 123:3 139:18 180:3,6 description 5:9 28:14,22 133:4 183:16,18 185:7,10 descriptions 44:6 design 26:18 28:12,15 29:6 30:6 33:17 34:15 37:6 39:10,19 40:7 40:20 41:22 47:21 49:8 50:7 designated 65:22	desirability 120:10 122:9 127:4 desirable 120:12 122:12 127:6 desired 37:18 133:14 142:17 147:11 detail 34:20 detailed 42:3 determination 142:10 168:9 determinations 159:7 determine 52:19 54:4 65:10 124:17 124:21 140:12 152:18 153:2 169:17 determined 119:16 120:11	

devices 30:20 47:15 differ 92:22 118:7 different 20:13 29:6,20 30:1,8 33:4 34:5 35:2 40:21,22 48:17 94:9 95:21 104:16 105:10 105:18 109:6 109:18 111:4 111:22 112:10 113:3 114:15 115:4 118:14 119:10 134:17 137:7 141:10 143:6 158:3 166:19 178:1 difficult 151:15 directed 149:1 163:14 disagree 94:22 95:2,4 96:9,16 108:17,19 112:14 118:7 172:1 disagreement 163:2 disclosed 68:19 discu 118:22 discuss 40:7 101:1 112:17 132:8 148:21 156:4 167:13	discussed 14:2 14:5,19 113:7 120:2 162:21 176:13 discusses 111:6 118:22 119:3 151:9 164:1 discussing 64:2 73:13 74:15 75:2 77:9 78:15 79:12 91:19 96:21 97:12,14 132:20 142:15 156:6 166:22 173:14,16 178:15 discussion 23:14 116:14 120:9 142:20 142:21,22 143:1 discussions 117:12 disney 1:4 4:4 5:4 6:22 13:19 191:1 192:1 194:4 dispenser 160:19 display 175:22 dissertation 28:3,11 29:1 29:18 30:1,5 31:6 38:19	39:6,7,9,11 distinguish 187:13 distinguishing 187:3 distributed 43:15 division 32:17 33:9 doctor 48:14,14 48:20 49:3 doctoral 28:11 38:19 doctorate 19:21 31:18 document 13:20 14:5 40:3 62:9,21 63:2,3 132:5 156:15 documents 11:21 12:2,3,4 12:12 13:16,21 14:8,10 19:12 19:14 40:1,6,7 40:18,22 44:1 51:11 67:17 doi 162:21 163:5,8,14 164:8 165:20 166:4 167:4,7 167:13 168:2 171:11 173:20 174:14	doi's 167:17 doing 39:16 45:22 46:14,21 51:5 65:17 124:20 142:10 143:20 146:1 147:18 156:5,7 159:14 173:15 173:16 190:6 door 36:14 dozen 25:9 dr 6:21 8:7 9:6 23:21 49:20 62:20 63:7 64:10 65:1,21 131:19 175:9 181:6,16 187:20 draft 17:3,6 19:7 104:17 drafted 16:14 drafting 17:12 17:21 18:8,19 18:21,22 drink 162:7 dryness 162:11 duly 8:10 131:6 189:5 duplicative 63:6 duration 180:13,17,19 184:20
--	---	---	--

e	electrical 20:1 27:12,16	entering 143:18	esquire 3:4,5 3:15 194:1
e 3:1,1 6:2,2 131:1,1 139:7 139:7 140:2 189:1,1 191:2 191:2,2 192:2 192:2,2	element 84:2,6 86:17 87:20 92:7 103:16 104:9 106:20 107:4	entertainment 103:5,14	est 130:13
e.g. 104:4	elements 102:13,16,17 119:18	entire 80:4 101:17 104:12 109:1,2 156:15 157:3 161:9	estate 91:2
earlier 14:19 15:21 34:16 50:5 76:22 90:14 92:10 109:3 134:9 138:17 143:18 148:1 171:1	eligible 152:7 153:12,16,19	entirety 67:12 123:13 127:9	estimate 15:18 16:9 25:8
easier 61:13	emphasize 101:6	entrance 32:20 36:10	evaluated 120:13 122:12 127:7
edited 17:1,16	empirically 120:11 122:10 127:5	entrances 154:17 155:3,8 155:16 156:3	evaluating 123:5 125:4
editing 18:19	employed 21:12	entry 15:13 103:9 122:15 149:13 158:13 184:11,17 186:9	evenings 38:16
edmonds 45:6 45:8,9,14,16,21 47:1,3	ends 91:16	environment 30:17 31:4	event 69:22 70:14,17 71:18 71:21 72:4,13 72:22 73:4,14 73:22 74:2,5 75:17 77:10 78:17,21 79:13 80:11,11 81:5 81:14 82:1,6 83:2,4 84:17 85:5,9,17,19 120:10,12 122:9,12 127:4 127:7
edt 1:15 2:18 6:6 66:22,22 131:2 175:3,3 188:7	engineer 20:2 32:2 38:5,7 46:2,18	equal 101:7	events 69:20 73:14 74:4,5 74:11,16,19 75:16 77:10 78:17,21 79:13 81:4,8,13,17 82:6,10 83:10 83:12 85:5 155:18 157:12
education 26:4 26:11 27:9 32:10	engineering 19:22 20:1 27:12,16,22 29:9 46:15 49:8 50:6 55:9	equivalence 28:5 56:6	
either 12:17 57:22 59:6 123:9 128:7,15 137:14,18 160:18 186:18	engineers 46:8 46:20	equivalent 28:21 29:3 48:2 70:14	
electric 47:18	enjoyable 169:8 171:6	errata 4:16 190:4,7,9,12 193:9 194:11 194:13,16	
	ensure 28:20	erred 94:15	
	enter 149:14 184:12		

159:12 evidence 64:15 64:21 65:8,14 95:20 97:18 exact 44:14 94:1,4,18,22 95:4,7,11,22 96:1,6,14 97:12,21 98:2 98:14 99:2,4 103:15 104:8 104:15,15,18 104:19 105:5 105:10,11,17 106:8,22 107:4 109:3,4,6,9,17 109:20 110:2 111:18,22 112:3,6,11,13 112:20 113:1,4 113:6,16,19,21 114:19 115:4,7 115:11,15 116:10,15,17 117:1 118:5,14 118:17 119:1,3 119:11 120:5 130:5,7 exactly 16:7 75:4 101:15 105:20 106:3 106:13,15 110:4 113:6 129:16 130:1,4	examination 4:2,7 9:2 131:5 131:15 181:13 examined 131:9 example 13:22 18:8 21:4 24:3 24:10 31:4,14 34:19 46:9 47:12 48:18 55:16 60:15 63:20 76:8 91:22 102:21 103:4 112:1 114:3 117:11 120:8 121:13 123:20,22 125:14 144:15 150:18 151:17 151:21 154:10 157:7,16 158:17 160:5 163:18 164:8 166:15 167:14 167:15 168:20 169:4,6 171:12 171:14 173:2 174:3 175:20 178:9,11,16,20 180:13,17,20 180:22 183:16 186:7,11 187:5 187:15 examples 49:7 60:6 157:16	158:3 171:11 177:9 exceed 54:11 except 193:7 exclude 110:13 excluded 59:20 94:1 excludes 97:7 98:18,19 107:19 110:13 110:17 111:8 111:11,14,15 111:17 114:15 114:19 115:7 116:3 117:12 117:22 118:4,5 excluding 112:1,4 116:21 exclusion 94:3 94:17 96:13 excuse 30:4 excused 188:5 exemplary 151:10 176:11 177:7 182:14 182:17 exhibit 5:9,10 5:15,16,17,18 15:8 16:12 23:2 24:1,1,7 52:12 61:4,16 62:3 67:20,22 131:20,22 148:11,12 162:16,17	exhibits 5:2,7 5:14 91:3 162:6 exist 19:16 37:19 39:22 existed 37:15 37:17 existing 40:16 exit 184:13,15 184:17 experience 20:9 21:15,16 26:5 26:17 32:11 41:13 45:2 54:16,19 55:1 55:5,9 56:7,10 122:22 177:19 178:6 experienced 37:1 expert 13:19 16:19 20:12,15 20:20,22 21:20 22:1,4,9 51:4 53:2 57:10,14 57:15,16,21 58:2,7,12,15 60:2,9,12,20 62:12,15 63:7 66:5,9,9 95:12 159:20 experts 16:21 60:7 expires 193:17
---	--	--	--

explain 34:16 109:10 117:7 explained 55:13 58:21 85:22 109:13 explaining 26:10 explanation 64:13 105:15 expressed 159:20 expressly 118:22 119:2,3 extensive 40:17 177:22 extent 18:12 22:14	106:16,21 107:5,8,10 181:1,3 factors 52:18 53:8 54:18 100:14 102:2 103:8,10 108:10 119:17 119:19 183:21 183:21,22 184:8,10,19,22 fail 190:14 fails 194:18 failure 47:16 157:21,21 158:5 fair 11:16 36:12 68:16 fairly 177:14 177:16,22 fall 109:20 familiar 10:12 21:6 67:9 far 98:15 favor 99:20,22 104:1,4 108:4 108:6 features 41:20 180:3,5 federal 32:16 51:19 52:6 56:21 fellowship 38:21 39:6	fellowships 38:17 fifth 2:4 figure 102:9,10 102:15 107:9 111:2 132:21 133:3,5 134:11 135:17 144:15 144:16,17 146:6,16,22 148:3 163:19 165:8,20 166:3 166:15,15,21 169:5 175:20 175:21 176:4 176:20 177:8 181:17,19,21 182:3,12,15,16 182:19,22 183:3,8,9,12,13 183:15 185:1,6 185:7,11,16 186:3,5,8,10,19 figures 157:4 filed 7:2 final 40:11 94:9 94:11 96:10,17 financially 7:15 find 151:14 156:17 finder 63:14 finding 175:13 fine 163:13 finished 28:19	finite 26:7 firm 7:11 45:17 47:6 51:8,13 53:4 189:16 firms 46:20 first 8:10 17:3 26:16 33:16 37:3 59:8 60:16 68:18 69:7,14 75:11 77:5,20 78:7 79:8 84:9 85:1 86:16,21 87:8 88:18,22 89:8 89:18 90:10,13 90:15,17 93:1 93:18 97:6 113:14 124:18 125:5,20 126:1 126:8,9 129:10 135:22 136:13 145:11 149:4 152:3 162:5 163:6,22 164:4 164:17 179:11 179:12,22,22 180:7 185:20 186:8,9 five 15:15 flaminator 176:8 flights 55:18 flipping 151:19 floor 2:4
f			
f 131:1 189:1 facilities 164:6 facility 36:13 36:17 68:20,20 119:15 122:18 122:21 182:14 182:17 187:11 fact 22:3 29:2 56:3 57:21 63:14 93:15 119:12 120:21 146:19 161:3 170:21 factor 100:19 101:12,14 103:3,16 104:9 105:21 106:14			

focus 45:18,20 focused 45:15 50:2 follow 24:14 181:10 following 89:5 97:1 100:5 137:6 139:16 follows 8:13 87:5 90:8 101:3 115:18 131:9 139:17 force 63:17 foregoing 189:3 193:3 forgot 18:15 form 59:18 122:13 175:21 185:11,14 193:8 format 17:1 formatting 17:16 19:5 forms 13:22 fortran 34:8 found 83:2 four 15:19 16:10 frame 33:11 fred 3:22 7:7 frequencies 166:10,13 frequency 165:22 166:10 167:2	front 15:11 25:16 62:9 90:20 175:10 175:14 full 9:8 25:15 150:10,14 152:3 164:17 fun 122:6 function 56:5 119:14 120:9 120:19 121:12 121:21 122:6,9 122:11,13,19 123:3,5,7 124:3,5,9,14,16 125:1 127:3 129:9 functional 40:4 40:9 functionality 37:16,18,20 functionally 28:21 functions 31:12 40:5,9 42:11 43:9,22 44:6 56:1 fundamental 24:4 80:19 further 88:21 131:9 154:14	gaithersburg 36:17 gallows 3:16 gathering 92:11 general 18:4,10 95:10 96:4 generally 130:6 178:21 generating 135:20 136:2,3 154:20 gentleman 162:12 gentleman's 163:3 gentlemen 62:1 georgetown 31:18 gestures 11:13 getting 48:2 53:6 158:11 give 42:6 60:6 64:4 83:17 87:15 96:4,5 104:14 178:2 given 15:22 41:14 46:20 74:21 75:21 76:4 158:18 159:2 173:8,11 174:1 177:10 189:12 193:5 gives 44:21 119:21 157:16	167:15 171:11 171:13 185:21 giving 51:11 go 6:18 11:3 23:6,9 24:2,8 27:7 36:20 38:15 39:1,16 45:3 51:10 56:12 58:5 62:17 66:16 90:22 119:12 126:16 129:1 130:9 132:11 133:10 140:16 143:11 145:14 149:6 153:3 154:9 156:11 157:7,15 161:13 162:3 164:9 167:14 170:18 171:12 174:19 177:19 178:6 179:3 185:6 187:10 goes 11:6 34:9 64:18,20 77:18 91:15 100:10 107:22 127:8 going 23:11 36:16 38:1,3,7 40:8 65:17 66:12,18 67:19 120:10 122:10 127:4 130:10 150:22 162:2
	g		
	g 6:2 gained 41:13		

169:15 174:21 gonsalves 1:14 2:2 4:3 5:3,8 6:21 8:7,9 9:6 9:11 23:21 49:20 62:3,20 64:10 65:1,21 131:4,19 175:9 181:6,16 187:20 189:3 191:1 192:1 193:2 194:5 good 6:9 9:5,7 23:5 66:13 68:5,8 graduate 38:8 38:9,14 grant 56:20 57:13 graph 165:22 greater 102:20 120:11 122:11 127:5 greenfield 2:3 7:6 50:18 gregory 1:14 2:1 4:3 5:3 6:21 8:9 9:10 49:20 62:20 131:4 189:3 191:1 192:1 193:2 194:5 gross 15:18 16:9	ground 11:4 group 3:14 37:8 102:18,19 103:9 116:1 133:19 134:7 134:19 135:4,8 144:2 147:8,14 147:22 150:7 150:12,17 151:9 152:7 153:10,12,16 153:18 154:2 179:14 180:2 groups 166:19 167:3 guess 14:3 18:10 20:4 32:5 36:20 81:18 136:13 141:20 187:2 gunfight 98:9 114:9 115:18	health 149:19 152:1,9,10,22 hear 118:3 hearing 25:11 heart 47:16,17 47:18 hearts 47:15 height 103:4,12 149:19 165:5 165:10,17 184:5 held 2:2 23:14 173:3 help 41:20 48:9 183:2 helped 117:7 helpful 64:17 hey 54:7 high 30:2 34:20 highly 101:7 historic 98:8 114:8 115:18 history 64:16 hogan 3:3 8:3 hoganlovells.... 3:10,11 hold 23:8 61:10 62:1 172:19 home 187:10 hour 53:3 66:12 hourly 51:8 hours 13:9 15:2 15:15,15	hughes 3:4 4:8 8:2,3 9:4 23:3 23:20 61:3,15 62:10 64:19 66:11,16 67:5 68:2,6,10,12 72:10,19 83:19 84:1,4 91:9 114:17 117:10 127:11 129:6 130:8 131:17 132:2 147:3 148:14 158:9 162:14,19 173:9 174:17 175:8 176:14 177:1,12 181:5 182:6 183:5 186:14 187:22 hum 139:14 hundreds 21:9 26:19 hydrotechnics 183:18
	h		i
	h 191:2 192:2 half 25:9 hand 11:13 62:18 67:19 102:12 162:2 185:3 handed 63:2 handing 162:15 happen 35:18 heading 52:15 62:19		i.e. 98:20 99:18 100:8 101:20 ibm 32:2,14,17 33:8,9,16 34:8 36:2 38:17 icd 47:14 48:1 idea 119:22 identical 122:3 122:5

identification 62:5 165:1	include 25:18 30:18,19,20 57:1 65:5 67:18 117:11	indicates 54:15 65:7 69:22 73:9,13 74:15 75:4,15 78:16 80:10 81:4,12 82:5 85:2,4 88:16 89:14,16 90:1,8,15 91:22 99:9 100:6 101:12 111:21 112:10 115:6 117:22 118:13 119:9 121:9 128:1 129:12 133:16 134:21 138:20 139:4,10 141:2 142:1 143:21 144:8 145:6,22 146:14 147:5 149:17 150:4 151:6,22 153:17 154:14 158:17 160:11 160:14 164:21 165:6,21 166:9 167:16 176:8	161:9 166:10 166:17 173:21 179:17 185:14 187:16 indication 147:19 160:7 161:21 165:15 185:22 individually 115:2 individuals 166:18 inequitable 59:22 60:7 61:1 62:16 65:14 infant 102:22 171:15 information 26:3 77:16 86:22 92:2,5,9 92:11,12,14,19 100:12 101:11 101:22 105:20 106:15 107:20 108:9 121:1 124:6,19 125:6 126:2,11 127:17,19 133:7 135:19 139:17 140:18 149:13,18,21 149:21 150:6 150:12,16 151:3,8,10,13
identified 97:8 103:10,12,13 110:14 111:20 114:22 144:18 144:20 146:8 146:21 151:7 165:7	included 54:21 includes 34:7 91:13 93:10 135:17 136:2 146:16,22 148:3 154:15 155:1,14 156:1 156:9 165:5	indicating 111:14 115:3 116:20 123:2 136:1 139:6 142:5 148:1 152:13 153:4 155:22 156:9 159:8 160:3	
idle 132:15 144:9,11 145:7 145:12,18 146:2,3	including 18:19 24:9 119:17 149:2 173:22 184:11 189:17	inconsistent 107:13 116:22 118:15	
ii 54:22 55:3,4	incorporated 7:1 123:12		
illustrates 167:2 182:12	increased 37:2 158:19 159:3		
images 35:4,6,7	index 4:2 5:2		
immediately 52:22 100:5 139:15 156:17 181:22	indicate 54:11 101:4 105:2 106:7 111:17 112:22 113:3 115:11 119:13 120:3,8,22 123:17 137:18 142:9 170:20 178:18		
imperative 190:11	indicated 186:2 189:5		
implantable 47:13			
implanted 47:15			
implement 44:19,22			
implementati... 31:10			
implemented 31:6			
implication 71:9			

152:17 153:1 163:19 164:10 165:1,4,13 170:17 172:8,9 informing 172:6 infringement 58:3,13,16,20 59:15 66:1,6 66:10 initial 17:6,21 initially 45:14 installed 149:13 instance 13:18 19:4 24:17 26:14 28:14 29:21 30:8 31:5 40:3 43:6 58:2 69:2,2 87:19 92:22 101:4 135:15 154:5 168:20 175:20 176:6 176:19 183:11 184:1,17 185:19 instances 87:10 161:4 institution 93:5 93:8,12,14,16 94:8 95:3 96:18 instructed 11:9	instruction 31:8 65:7,10 instructions 4:15 190:1 integrated 28:18 29:6 30:7,7,12,15 34:15 55:22 integrates 40:16 integration 28:12 intellectual 45:17 intent 60:8 64:22 interact 41:6 41:10 42:6 interacts 42:11 interconnecti... 30:20 interconnecti... 30:11 interested 7:15 31:15 189:14 interface 43:22 132:21 133:3 134:10 135:16 136:2,12 143:12 144:13 144:22 145:18 146:5,7,15,19 147:18 148:2,9 intermediate 96:10,16	interpret 94:11 95:14 119:4,20 interpretation 117:8 122:16 interpreted 84:20 109:16 112:18 114:8 115:1 116:19 117:19 120:4 123:19 interrupt 182:2 intrinsic 95:20 invade 165:10 invades 63:13 invalid 24:12 24:19 invalidity 22:5 22:18 24:5 58:8,16,20 59:11 65:22 66:6 95:13 invection 176:2 invention 24:20 24:22 119:14 120:1 133:9 163:22 176:2 inventor 113:18 invitation 173:18 174:3,5 174:10,13 invitations 173:7,10 174:1 involve 30:2 35:12 46:13	involved 13:17 17:12 18:2,3 18:11,11 28:12 29:1 35:20 37:19 40:15 46:1,6 49:9,17 159:18,22 involvement 159:9 161:10 161:20,22 involves 22:15 31:2 40:21 56:4 involving 59:22 ip 3:14 8:6 ipr 9:14,17 12:5 13:17 14:9,11,14 15:3,9 17:9 19:13 20:21 21:22 22:5,10 22:13 51:14 57:13 67:7,7 156:16 ipr2024-00029 1:10 7:4 9:18 10:9 51:5 iprs 51:19 57:1 57:4 issue 59:10 63:16 65:15,18 65:19 121:2 issued 172:15 issues 13:17 22:5 46:7
---	--	---	--

58:13 64:22 issuing 173:18 item 55:3 166:13 176:20 178:8 items 186:1 itineraries 68:15,19 74:4 82:10 83:12 itinerary 68:22 69:5,5,9,11,13 69:19 70:14,17 71:18 72:4,22 73:10,13,22 74:4,10,15,19 74:21 75:8,10 75:12,16 76:1 76:3,13,14,22 77:4,6,10 78:13,16,20,20 79:9,12 80:1,4 80:7,10 81:2,4 81:11,13 82:3 82:5,20 83:7 83:10 84:13 85:2,2,5,9,20 85:21,21 87:6 87:7 89:8,19 90:10 134:17 169:15 170:1 171:22 176:3 185:13	j j 3:5 6:21 49:20 japanese 163:7 java 34:8 jay 3:15,19 8:5 194:1,2 jenner 49:12,17 jersey 2:10,11 job 1:22 39:8 39:13 46:9 66:7,9 joe 3:5 join 160:4 161:7,11 joined 160:9 jones 45:6,9 47:1,3 49:11 joseph 1:14 2:1 3:5 4:3 5:3 8:9 9:10 131:4 189:3 191:1 192:1 193:2 194:5 joseph.raffetto 3:11 journeys 1:7 4:4 5:4 7:1 8:6 12:20 17:2 18:7 19:4 51:14 191:1 192:1 194:4 judge 21:11,16 50:15 65:16 judgment 122:19	juggling 91:3 june 50:12,12 juris 31:18 jury 64:12,17 65:9	47:9 48:4 53:3 55:8 60:8 68:11 75:1 79:17 82:14 84:16,18 91:10 95:9 102:11 106:2,2 107:12 110:11 118:6 119:4,22 132:13 165:3 174:12 176:22 177:15,15 178:14,15 183:9,13 184:1 184:11 185:18 187:5 knowledge 20:5,18 21:17 known 113:20 135:17
		k keep 162:13 keeping 162:12 keeps 150:22 kesan 3:15 4:9 8:5,5 13:1 23:5 66:15 68:4,7 72:7,11 83:17 83:21 84:3 162:8 181:9,15 182:9 183:1,7 186:4,16 187:19 194:1 key 3:14 8:6 keyiplaw.com 3:19 194:2 kicked 48:2 kid 103:5,14 kids 184:4 kin 189:13 kind 18:3 96:22 110:3,20 kiosks 149:14 kit 43:8 know 12:8 13:20 15:18 16:7 20:8,13 20:15 22:4 26:7 29:8 31:2 34:3,19 46:4	l l 1:18 2:5 189:1 189:19 labeled 145:4 language 27:2 80:14 82:12,15 105:14 106:5 110:8 112:9 113:14 114:2 150:20 languages 26:22 27:3 33:21,22 34:5 34:6

large 41:5 102:17,19 164:5 late 38:16 158:20 159:3 latest 15:7 latitude 119:14 law 2:2 3:14 20:12,15,16 22:2,15 32:1 36:16 38:1,4 45:15,17,19,21 46:19 47:6 49:17,20 50:3 50:9 53:8 80:19 leading 183:6 186:15 left 33:3 36:4,7 36:7 49:11 62:18 102:12 102:16 145:2 177:8 181:21 185:3 legal 7:8,11 22:19 24:9 51:8 194:23 length 26:8 55:9 level 30:2 34:20 37:2 52:16,19 53:7,10 library 42:2 life 26:9	light 85:14 95:16,18 97:16 104:22 106:7 109:16 110:10 121:5 127:22 163:6 limit 103:4,12 184:5 limitation 76:10 92:4,15 94:12 125:14 limitations 127:22 limited 63:20 line 69:16 70:5 82:21 85:22 87:18 100:21 116:5 121:13 122:3,8 124:2 129:11 132:12 132:14 133:2,5 133:13 136:12 136:14,21 137:3,21 138:19,19 140:17 141:2 141:13,13 143:11 144:8 145:6,9,15 149:11 150:4 154:10,11,14 157:8 161:14 164:9,13 165:3 166:5 167:15 171:13 180:10	180:12 181:1 182:10 191:3,5 191:8,10,13,15 191:18,20 192:3,5,8,10,13 192:15,18,20 lines 26:20 68:8 72:9 98:6 100:2 104:6 114:4 115:9,17 116:1 121:21 129:2 151:1,22 160:5,6,10,13 160:16 172:14 links 182:18 183:12 list 32:22 33:11 34:9 52:18 53:8,16 56:13 57:20 60:16 133:17 134:2,5 134:14,16,17 134:21,22 135:2,7,18 142:16 143:2,4 143:13,20,22 145:16 146:10 146:11,17 147:1,6,12,20 148:4,6,7 176:20,21 177:22 178:2 186:1 listed 52:2,7,9 57:5,6 58:4	59:4,5 62:13 177:7 178:8 179:2 180:2 181:4 184:22 186:8 listing 32:10 lists 27:8 32:13 150:11 158:2 litigation 51:18 57:13 litigations 52:2 52:6 56:14,17 little 13:10 34:16 154:13 164:16 174:18 184:6 live 47:19 livelitigation 1:21 2:17 livenote 2:6 llc 1:7 4:4 5:4 7:1 191:1 192:1 194:4 locate 154:8 location 7:5 98:8 133:21 135:10 144:4 147:16 156:17 177:19 178:5 178:10,12 179:3,5 locations 100:22 159:20 160:3
---	--	---	---

lockheed 36:6 logic 28:6 30:9 long 13:8 20:7 20:7 68:7 181:11 look 10:2 12:10 12:10 14:4,4 15:13 16:8 39:18 41:1,16 43:17,19,20,21 44:5,11 46:5 54:14 69:3 76:7 79:15 83:13,14 84:15 92:3 102:10 119:7 125:13 129:1 133:4 136:10,12 150:3 163:21 164:8,16 165:2 165:19 166:4 172:13 176:4 177:21 181:17 182:1,3 185:7 186:7 looked 12:12 76:19 111:2 145:22 146:6 151:5 looking 42:22 71:12 75:15 78:12 90:6,7 120:7 128:4,12 139:9 142:15 154:5 166:16	looks 50:11 57:2 loral 32:14,16 33:3,5,7,8 36:2 36:4 lot 32:21 36:10 40:21,22 86:5 91:2 loudness 184:2 lovells 3:3 8:3 low 97:7 98:3 98:10,13 100:9 101:21 110:13 111:7,9,15 112:1 114:10 114:13,15 115:19 116:4 116:21 117:17 lunch 185:4 187:5 luncheon 130:14	51:11 59:4 75:7,22 87:15 107:8 168:15 190:2 makes 27:2 129:13,18 167:17 168:8 168:19,22 169:18 171:2 185:18 making 125:9 159:6 167:7 168:6 169:12 169:21 170:21 man 20:6 162:9 management 40:14 149:2 manager 154:4 154:6,7,12,15 154:19 155:4 155:14 156:1,7 156:9 manufacturing 28:17 map 182:14,16 182:21 mark 23:2 61:3 61:8,13,16 99:21 108:5 171:8 marked 62:5 131:20 148:11 162:16 markers 100:1 104:4	marks 10:1 99:19 103:22 104:2,3 108:3 108:5 110:17 111:1,6 martin 36:6 maryland 36:17 massachusetts 2:3 massively 28:4 master's 19:22 27:15 38:18,20 39:2 match 94:1,1,4 94:5,18,22 95:1,4,5,7,10 95:11,22 96:1 96:2,6,6,14,15 97:7,13,21,22 98:2,3,10,12,12 98:14,20 99:2 99:4,5,10,16,18 99:18 100:4,7 100:9,18 101:1 101:2,13,19,21 103:15,17,20 103:21,21 104:8,10,13,15 104:16,16,18 105:5,5,9,10,11 105:12,17,17 105:18 106:1,8 106:8,17,19,22 107:4,6,7,11,19
	m		
	m 139:7 140:2 machine 28:15 31:7,8 189:9 made 73:5 101:5 118:8 133:8 139:11 139:18,22 140:13 164:21 167:10 176:9 190:5 make 35:16 40:13,15 42:2		

107:20 108:1,2 108:3,16 109:3 109:4,6,7,9,9 109:17,18,20 109:21 110:2,2 110:4,13,18,19 111:7,9,10,10 111:11,15,15 111:18,22 112:1,3,5,6,10 112:11,13,17 112:20,20,22 113:1,4,6,19,21 114:5,10,13,14 114:16,19 115:4,7,7,11,12 115:14,15,20 116:4,9,10,11 116:12,15,17 116:20,21 117:1,2,13 118:1,5,10,14 118:15,16,17 119:1,3,9,10,11 119:16 120:3,5 120:20 121:3,5 123:6,18 126:10 127:13 128:6,14 129:14,20 130:1,4,5,7,7 133:18 134:6 134:18 135:3,7 142:16 143:3 143:14 144:1	147:7,13,21 matched 107:16 matches 86:22 91:13,20 92:1 92:5,8,13,19 95:21 97:7,15 97:19 98:18 99:9,9 100:6,6 100:11,12 101:10,11,18 101:18,22 102:1,7 104:20 105:3,21 106:14,15 107:17 108:8,9 108:15,15 110:4,12 111:4 111:8,14,17,21 112:2,5,18 113:2,3,13,16 113:17 114:1,7 115:1,3 116:3 116:19 117:9 117:12,17,18 117:22 118:4 118:10 121:1 122:2 123:14 124:19,22 125:6,9,16 126:2 127:17 128:2 129:22 130:3 173:5 matching 100:18 124:6	145:16 172:16 173:5 material 19:2,8 64:7 72:6 91:8 113:10 117:4 126:21 129:5 146:13 158:1 172:22 175:18 176:18 177:5 185:9 materiality 63:6 64:22 materials 10:4 13:12,15 14:1 14:13,16 matrix 111:1 matter 6:21 20:21 21:1,3 21:20 29:7 51:2 93:5 104:3 108:5 175:13 189:17 matters 51:15 51:16,18,21 53:5 mean 26:6 31:1 33:20 46:8 48:8 51:17 102:5 106:18 112:1,2,5 121:3 123:4 128:21 142:22 177:16 182:2 186:22	meaning 102:6 109:14 118:9 118:13 meaningful 12:13 13:13,15 means 76:11,12 88:13 90:16 103:22 105:3 107:17 115:10 119:9 124:20 154:15 155:1 155:14 156:1 measure 122:19 measuring 124:5 media 6:19 medication 48:13,15,18 medications 48:19,22 49:5 49:5 medicine 48:10 meet 12:14,16 12:19,21 13:5 13:8 39:20 54:11 187:6 member 150:7 150:17 151:9 179:13 180:2 members 133:19 134:7 134:19 135:8 144:2 147:7,14 147:22 152:7
---	---	---	---

153:12,16,18 memorandum 5:10 62:4,18 memories 172:18 173:7 memorize 156:14 157:2,5 165:8 memory 22:20 30:19 42:4 51:12 156:13 164:22,22 165:1,7,16,16 mention 22:18 26:8 72:17 75:2 76:17 80:21 98:18 99:14 121:8 134:8,10 135:15 142:13 mentioned 12:5 13:11 15:21 17:15 18:18 20:8 37:22 43:3 55:16,19 56:2,3 66:8 67:6 82:15 100:5 111:3 116:4,8 160:21 161:5 mentioning 15:6 154:7 170:12 mentions 24:12 64:9 69:4,8	78:13,20 79:12 79:18,20,21,22 92:10 102:8 110:16 117:15 143:17 146:5 154:11 164:5 merged 45:9 merit 2:5 message 139:20 171:5 172:3,15 met 13:7 method 68:14 68:18 87:6 88:10 93:2 methods 57:2 mexico 2:12 microphones 6:12 midatlantic 194:15 middle 184:22 mind 60:10 mine 16:22 minimum 158:12,14 minus 108:3 minutes 66:12 mistaken 123:8 mixing 82:11 82:15 modifying 133:7 moment 64:4 monday 11:22	morning 6:9 9:5,7 120:3 158:18 159:1 mouth 162:10 movie 101:4 178:11,13 179:4,6 180:16 180:18 movies 101:5 176:10 mule 48:3 multiple 29:14 31:8 68:21 100:22 160:20 mumbles 172:20 mundane 43:9 museums 164:2 164:7 mute 6:14 n n 3:1 6:2 131:1 131:1,1 name 7:7 8:2 9:9,10 36:13 163:3,6 186:8 named 140:7 183:17 names 181:22 183:10 185:2 nationally 189:1 nature 17:2 19:6 30:21 42:5 94:4,18	96:14 184:5 navigation 163:15,18 164:18,20 167:17 168:17 168:19,21 169:12,18,21 170:21 171:2 171:16,21 172:2 173:15 173:17,22 navigational 164:11 nearly 32:1 necessarily 70:7,20 71:1,6 71:10 73:7,17 74:7 75:18 77:12 187:17 necessary 190:2 need 11:8,13 35:4 40:1,19 43:9 105:5 136:6 162:8,13 needed 42:7 56:5 58:5 needs 37:21 149:22 152:16 neither 99:17 103:20 108:2 189:13 neutral 98:20 107:20 111:10
--	--	--	---

never 128:15 new 2:10,11,12 2:13,14 36:18 37:20 nice 48:3 49:2,3 nickname 164:21 165:6,9 165:16 night 32:4 nine 138:17 nj 1:18,19 189:20,20 nm 1:19 189:20 nod 11:13 node 184:11,14 184:18 nodes 182:17 182:19 183:12 nonreserved 173:4 norm 53:4 normal 39:8 51:15 northeastern 27:12 northwest 2:3 3:7 notary 1:21 2:17 189:22 193:22 note 6:12 53:11 78:13 89:12 107:18 138:18 194:10	noted 190:9 193:8 notice 12:9 54:17 55:3 60:18 136:21 189:4 noticed 7:19 26:14 52:21 68:17 98:5 noticing 8:1 notifies 171:15 nullified 99:19 103:22 108:4 number 5:9 7:3 24:1 61:14 62:4 67:22 103:12,14 110:22 122:14 131:22 133:5 138:13 144:19 144:20 146:4,8 146:21 148:12 150:18 151:7 158:10,12,13 158:15,18,20 159:2,3 162:17 165:7 166:13 numbers 32:8 116:5 numeral 55:4 numerous 160:2 161:3,4 161:7 177:9 ny 1:19,19 189:20,21	o o 6:2 131:1,1,1 o.k. 98:9 114:9 115:19 oath 7:13 10:19 object 11:8 27:3 objection 26:21 27:1 183:5 186:14 objectionable 99:11 100:8 101:20 objections 7:16 objects 42:1 44:2 obtained 189:15 obtaining 133:7 135:19 obvious 24:13 24:20 obviously 19:20 27:1 41:4 43:3 obviousness 24:15 occupying 35:17 occurs 107:20 157:21 158:5 offer 58:7 65:22 offered 59:9,13 59:14,17 62:12	62:15 66:5 154:17 155:5,8 155:16 156:3 offers 119:14 office 7:3 21:5 21:7 39:1 offices 2:2 49:20 oh 48:15 83:21 okay 9:22 10:8 10:9,18 11:3 11:19 12:19 13:5,11 14:3 14:12,16 16:11 19:19 22:8 23:21 26:3 34:2 35:13 44:10 45:7 46:17 52:18 56:15 61:7 62:8 63:1 68:6 68:13 72:11 83:22 86:14 87:14 90:19 109:8 116:13 126:16 128:19 131:18 132:17 133:10,12 140:16 142:14 144:7 145:5 148:10 149:9 152:3 156:6 162:1 163:12 165:12 167:4 174:14,16
--	---	---	--

175:9,15 179:8 179:9 180:8,22 181:5,8 old 3:16 48:11 48:21 ones 46:6 120:2 online 68:5 ooo 4:1,6 5:1,6 6:1,3,4,7 8:8,14 8:18 9:1,3 23:13,16 62:2 62:7 66:20 67:1 130:12,15 131:3,10,14,16 175:1,4 181:12 181:14 operating 42:6 43:6,16 operations 55:20 operator 119:15 operators 122:21 opine 60:9 opinion 16:16 58:7 61:5 74:21 94:14 105:4,8 106:11 107:13,15 109:13 110:12 111:5,5 128:4 128:11,16 opinions 18:7 19:3 58:19	63:6 65:22 66:6 opposed 51:20 opposing 63:9 optionally 139:19 order 5:10 14:5 39:20 40:8 41:8 43:10 44:19 45:2 47:18 61:4 62:4,18 65:8 116:9 124:17 124:21 126:15 152:17 153:8 ordinary 24:21 25:2 52:16 53:7,10,14 54:8 109:14 118:9 oregon 2:14 oriented 26:22 27:1,3 original 190:12 outcome 7:15 189:15 own 37:4,6,13 41:18 43:18 44:3,4 45:1 47:5 49:22 owner 1:8 3:13 18:3,5,9 104:17,19 181:13	owner's 16:2 16:13 17:8,13 p p 3:1,1,15 6:2 194:1 p.m. 130:11,13 131:2,12 174:22 175:3,3 175:6 188:3,7 package 43:5 page 4:7 5:9,14 7:20 24:3,6 25:20 26:16 27:7 32:6,8,9 45:4 52:11 56:13,16,19 57:19 62:17,21 63:1 90:22 91:5,11,17 93:17,19 99:7 149:6,8 150:3 150:9,14 151:6 151:22 152:3 154:9,11 157:4 157:8,15 158:11 161:13 191:3,5,8,10,13 191:15,18,20 192:3,5,8,10,13 192:15,18,20 pageable 135:18 146:17 147:1 148:4 pages 22:21 91:16 151:19	157:3,3,4 193:3 paid 22:6 51:1 paper 93:16 paragraph 24:10,11,18 52:22 53:12,15 54:10 63:11,19 64:1,9 65:5 70:4 71:22 72:16 73:1,6 74:3,14 75:1,3 75:14 77:8 78:15 82:21 91:12,12,14,15 91:15 93:3,7 93:14,18 94:7 94:13 96:20 97:2,5 98:5,17 98:22 99:8 101:17 108:22 110:18 117:14 117:20 119:12 120:7,16,17 123:1,2,11,16 124:1 126:16 127:1 129:11 132:10 133:1 134:9 136:1,8 137:14 138:1 138:16,16,18 138:19 139:10 139:13 140:5 140:21 143:16 144:6 145:12
--	---	---	--

145:15 147:4 147:11 148:1 150:10,15 152:4,6 164:1 164:17,19 165:3 170:6,19 171:1 172:13 173:2 174:2 paragraphs 24:14 93:10,11 112:16 120:6 123:16 138:17 173:13 parallel 28:4 parameters 65:10 122:14 165:9,17 parentheses 102:20 129:19 park 29:22 31:16 149:12 149:13,18 163:16,20 176:6 178:20 183:17 184:17 186:9,10 187:15 parked 32:19 parking 32:20 36:10 parks 1:4 4:4 5:4 6:22 164:1 164:6 178:16 191:1 192:1 194:4	part 24:8 26:20 31:10 34:13 38:10,14 47:4 47:5 54:15 55:4 81:2 93:19 136:5 140:8 144:13 156:16 particular 31:3 31:3,5 33:9 34:22 66:7 72:16 74:14 87:22 89:3 90:7,12 91:16 94:12 95:16,19 95:20 98:8,13 101:3 102:4,7 103:11,11 112:16,21 114:12 116:1 119:5 120:5,19 121:8 125:3 127:13 133:18 134:6,18 135:7 137:13 142:4 142:12 143:16 144:1 147:7,13 147:21 152:1,8 153:16 156:8 165:16 166:18 166:21 167:5 171:5 172:5 173:13 179:20 184:13 187:17	particularly 21:21 parties 2:20 6:17 53:12,21 57:8 65:12 98:11 114:11 115:20 151:3 parts 81:19 party 7:14 63:9 68:19 69:5,9 70:9 71:16,22 72:21 73:3,18 73:20 74:1,8 74:11,17 75:5 75:13,21 76:14 77:7 87:6 92:11 97:8 98:13 100:11 100:12 101:10 101:11,22,22 105:20 106:15 107:21 108:9,9 110:14 122:15 124:7,20 125:7 126:11 127:20 176:3 189:14 party's 129:20 129:22 130:3 passage 118:3 passages 111:19 112:7 112:12,21 113:6 114:6 117:6 118:18	passed 170:17 passenger 35:19 passing 131:20 patent 1:2,8,11 3:13 7:2 10:10 10:13,16 13:20 16:2,13 17:13 18:3,5,8 20:3,9 20:12,15,16,17 21:4,5,6,7,9,12 21:13,18 22:2 22:9,13,15,15 24:19 28:9 29:4,19,21 31:13 35:10 45:15,19,21 46:4,5,12 49:15,17,17 50:3,9,10,15,20 51:4,20 56:8,9 60:10 64:13 67:7,10,15,18 67:21 68:13 69:1,3,16,19 70:6,13 73:9 73:12 74:20 75:4 76:5 77:1 80:19 83:15,20 88:6 95:16,19 95:20 96:7,9 98:7 100:1,21 100:22 104:17 104:18 106:11 112:9,22
--	--	--	--

114:20,21 116:2 117:7,16 118:19 119:7 175:10,16 176:13 177:11 177:18,22 178:15 180:21 181:13,17 patents 64:15 95:15 104:6 path 30:10 patient 47:22 48:1,4 49:3,4 patients 48:9 49:6 patron 31:15 133:16 134:5 134:13,15,19 134:20,22 135:11 136:16 137:1,4,16 138:4,21 139:11,19,22 140:13 142:10 142:13 143:13 143:22 144:19 144:21 145:4 146:7 147:6,12 147:20 148:9 159:21 160:4 161:5 167:10 168:6,8 169:13 169:16,22 170:17 171:22 172:6 177:19	178:6 179:3 patron's 133:19,20 134:7,19 135:4 135:8,9 144:2 144:3 147:8,14 147:15,22 170:1 patrons 153:2 180:16 pcd 132:21 134:3 139:17 143:12,17,18 143:20 144:8 144:10,13,19 144:21 145:4,7 145:12 146:1,4 146:7,9 147:17 148:9 penalties 189:7 penalty 8:10 193:7 pennie 45:6,8 45:14,16,21 47:1,3 penny 45:8 people 20:13 37:7 42:22 45:22 46:19 47:16 48:10 160:7 perfect 119:1 perform 31:11 40:8 42:11 56:5	performing 166:6 performs 43:8 43:22 perjury 8:11 189:7 193:7 permitted 60:2 60:5 65:1 153:22 person 12:18 24:20 25:1 48:21 53:13 54:7 160:3,11 161:6 165:18 169:8,15 person's 165:11 personally 41:9 persons 171:7 perspective 59:10 pertains 21:22 pertinent 14:8 petition 16:14 17:9 petitioner 1:5 3:2 8:4 9:2 131:15 ph.d. 1:14 2:2 3:15 4:3 5:3 8:9 27:21 31:17 131:4 194:1,5 phone 12:17	phones 6:15 phrase 74:1 77:17 84:12 89:22 90:7 92:1,13,18 93:10 98:22 116:16 118:13 119:2,5 120:22 124:14 125:18 127:16 149:4 174:1 physical 177:18 178:5,10 179:3 179:5 physically 12:17 pick 6:13 136:6 piece 79:19 pile 175:13 pilot 35:19 pincites 62:22 pl 34:7 pl8 34:7 place 6:17 32:19 36:9 45:11 151:14 189:5 plain 109:14 118:9 plan 167:17 168:19,22 170:21 171:2 plane 35:20 planes 35:16 55:18
---	--	---	---

planner 167:17 168:17,19,21 169:12,18,21 170:21 171:2 171:16,22 172:2 173:15 173:17,22 please 6:12,14 7:17 9:8 11:7 11:12 64:5 69:16 130:9 190:1,6 pllc 3:14 plurality 160:12 plus 99:20,22 104:2,4 point 22:21 32:17 35:3,17 39:14 80:18 97:6 98:16 99:6,8 100:4 100:21 102:4 107:22 108:7 116:6 117:21 120:17 126:19 141:6 175:19 pointed 111:13 points 97:4 102:5 127:2 149:13 pokekun 171:17 172:4,7 173:3,11,12,18	policy 99:22 104:3 108:6 158:14 poor 97:7,22 98:10,12 99:18 100:9 101:21 103:21 108:2 110:13 111:7,9 111:15 112:1 114:10,13,15 115:14,20 116:4,21 117:17 popular 173:3 portion 11:22 73:12 89:11 95:13 100:20 101:3 108:22 109:1,2 116:14 119:7 120:15 126:4,13 137:13 138:14 139:5 141:21 155:21 173:20 179:11,21 portions 76:5 92:20,21 105:2 111:13 115:10 116:7 117:16 118:12 121:8 167:12 posita 54:2,12 54:15 59:10 position 35:2 141:4,15 142:3	142:6 143:9 positions 35:3 positive 99:20 99:21 100:14 102:2 104:2,2 108:5,10 111:1 possible 122:17 122:18 129:14 129:18 post 56:20 57:13 potentially 100:13 102:1 poughkeepsie 36:18 39:1 power 12:11 13:21 30:19 practical 54:15 54:18,22 55:5 practice 21:4 21:16 22:9 practices 21:18 22:15 practitioner 50:1,9 preamble 84:13 87:13 preceding 57:19 73:7 99:16 108:14 precise 122:15 precluded 63:21 preferences 97:9 110:15	133:18 134:6 134:18 135:3,8 144:1 147:7,13 147:21 149:14 150:20,21 preferred 150:20 160:8 preliminary 16:2 premises 180:15 prepare 11:19 prepared 15:5 17:6 21:8 40:2 preparing 12:15 15:3,4 16:6 19:11 prescribe 48:17 prescribed 49:1 prescribing 48:15,20 presence 110:22 present 2:19 3:21 64:12 76:13 111:7 133:9 147:6 176:1 presentation 76:11,12 134:2 presented 64:12 65:9 72:2,21 73:20 74:2 75:5
---	---	---	--

76:22 133:17 134:5,16,20 142:17 143:4 143:22 147:12 147:20 148:8 169:6 178:13 179:6 presenting 68:14 134:8 143:13,20 145:16 146:10 146:11,20 presents 135:16 145:18 146:15 148:2 preset 157:11 159:6,11 161:16 prevent 10:22 previous 18:1 18:14 164:19 173:1 178:3 previously 131:6 133:8 139:11,18,22 140:13 primary 45:20 50:7 principles 22:19 176:1 prior 13:19 36:17 185:22 privacy 165:11 private 6:14 21:16 63:13	probably 15:18 16:9 25:9 61:12 163:6 problem 44:14 48:18 procedural 26:22 procedure 21:5 21:7 22:9,16 40:14 64:13 procedures 21:18 44:2 proceeding 7:17 9:14,18 14:14,22 22:2 52:13 59:8 67:20 95:12 131:21 148:11 162:16 proceedings 56:20 57:13 58:17 193:5 process 28:13 processes 29:14 processing 30:19 processor 138:1,4,20 139:20 140:12 141:3,14 142:2 142:5 143:8 processors 31:9 31:11 products 41:8	professional 2:7 profile 100:12 101:11,22 102:13,16 103:16 104:9 106:19,20 107:4,8 108:9 119:18 122:15 122:16 129:20 130:1,4 program 42:3,7 programmed 34:2,4 157:9 161:15 programming 26:22 33:20,22 34:5,6 project 29:9 34:22 35:15 48:8 projects 41:5 42:20 47:4,7 47:10 48:5 49:9 50:7 prompter 150:18 160:19 prompters 150:19 152:12 153:7,10 154:2 prongs 60:8 pronounce 163:2,5 pronouncing 32:15	proper 97:17 97:19 properly 43:10 property 45:17 propounded 193:6 prosecuted 21:8,8 prosecution 51:20 64:16 prosecutor 46:16 provided 5:7 64:7 72:6 91:8 113:10 117:4 126:21 129:5 139:19 146:13 158:1 172:22 175:18 176:18 177:5 185:9 provides 167:4 providing 69:5 87:6 97:18 province 63:13 proximity 133:20 135:4,9 144:3 147:9,15 ptab 21:17 public 1:21 2:18 189:22 193:22 publication 161:9 publicly 43:13 43:17,20
--	--	--	---

pure 103:21 purported 24:22 65:2 purposes 35:16 pursuant 189:4 put 107:14,15 putting 113:21 pyrotechnics 176:9	141:16 142:4,8 149:1 154:4,6 154:7,12,15,17 154:19 155:3,4 155:7,13,15 156:1,3,7,9 160:4,14 184:21 queues 160:8 160:12,17 161:6,11 queuing 167:19 169:1 171:4 quick 182:1,3 quite 19:21 34:9 36:8 61:1 128:21 quote 172:5 quotes 119:22 120:1 170:11 170:14 174:4 quoting 93:4 93:20	reach 94:10 read 64:5 65:6 65:21 67:12,14 70:11 79:17 84:12 85:11 86:6 89:11 90:1 93:11 94:7 100:16 108:21 115:13 137:7 139:16 142:13 161:3 190:1 193:3 194:9 reading 73:2 75:3 87:5 138:17 141:7 141:22 173:14 reads 101:3 real 2:6,9 91:2 reallocate 157:10 161:15 reallocating 159:10,19 161:20 reallocation 158:4,8 159:7 159:14,22 160:22 reallocations 157:17,19 really 12:8 43:20 46:8 48:11,11,18 170:15 171:8 174:5,12	realtime 1:19 2:12,13 189:21 reason 59:20 115:22 190:3 191:4,6,9,11,14 191:16,19,21 192:4,6,9,11,14 192:16,19,21 194:11 reasons 104:14 recall 47:11,12 67:6 75:3 142:14,18 receipt 190:13 194:17 receive 14:17 38:17 44:17 76:12 received 39:6 160:18 receiving 60:4 60:11,20 recent 18:15 recess 66:21 130:14 175:2 recite 86:9 93:22 120:18 124:13 125:3 recited 56:11 105:9 118:11 123:7 recites 77:15 84:21 88:20 92:7
q			
qtags 152:12 153:7,10 154:2 qualified 63:5 66:1 question 11:7,9 14:6 18:1,2,14 18:15 21:19 44:12 52:9 53:6,7 68:11 72:18 75:20 78:11 80:14 81:19 85:16 95:9 96:3 105:14 106:18 107:1,3 109:22 110:20 115:9 122:1,4 143:10 171:8,10 172:11,12 174:6,7,13 questions 11:12 181:7 187:22 193:6 queue 122:18 140:19 141:5	r r 3:1 6:2 131:1 139:7 189:1 191:2,2 192:2 192:2 raffetto 3:5 range 122:17 122:18 rate 51:8,13,15 rated 98:10,13 101:7 114:10 115:19		

recognize 62:11 132:5 148:15 162:20	130:9,11 131:12 174:19 174:22 175:6	86:11 89:2 94:8 95:10 116:10 124:1	116:18
recognized 119:13	189:12	127:15,18 152:21,21	relates 112:19 117:17 138:16 142:21,22
recollection 168:2,2	recorded 189:8	refers 90:13 92:12 98:6 100:1 104:5	relation 17:22 18:1 82:9 83:11
recommend 167:18 168:22 170:22 171:3	recording 6:16	reflects 26:4	relationship 85:8 150:18
recommendat... 71:13,19 168:16 169:7 169:12 170:9 170:10 171:9	records 15:13 16:8	refresh 22:20 162:7	relative 133:20 135:9 144:3 147:8,15
recommendat... 167:5,8 168:14 169:19,22 170:16 171:14	recreation 98:9 114:8 115:18	regarding 24:4 58:16,20 113:12 119:22 124:7,18 125:5 126:9	relevant 28:9 28:10 35:10,11 41:20 54:15 56:7 64:16,21 149:20
recommended 70:9 71:16 72:1,3,20 73:3 73:18,21 74:8 74:12,17 75:6 75:21 77:1 135:12 170:5	reduced 158:18 159:2	register 160:11	reliable 64:17
record 6:10,18 7:22 9:9,17 12:5 14:9,10 14:13 19:13,15 23:1,7,10,11,15 23:18 24:1 49:3 51:22 52:3,8 66:17 66:19 67:3	reference 102:9 103:12,13 132:4,7 144:18 144:20 146:8 146:21 148:16 148:18,20 151:7 162:21 165:7	registered 2:5,7 152:11 153:6,9 153:21 154:1	relied 19:12,18 20:4
	referenced 194:6	registering 160:14	rely 19:10
	references 156:16 164:18	registration 158:16 160:17	relying 110:7
	referred 5:14 40:3 68:1 115:8 132:1 148:13,16 162:18	regular 39:13	remark 61:19
	referring 15:6 72:8 82:17	relate 101:2 114:22 117:16 118:12 141:10	remember 17:5 27:6 32:18 36:3 38:21 47:10,20 48:7 48:22 52:1 54:3,6 56:3 60:4,11,19 142:19 154:6 157:1 167:7,11
		related 7:13 10:9 12:8 29:17 34:12 55:11 64:15 105:16 114:6	remind 81:19
			remote 1:20 2:16 12:18

remotely 160:11 193:6	142:5 143:8	136:17 137:2	47:6 49:16
removal 160:18	requested 138:5,8,11,21	138:5,22 141:4	responsibility 37:2,3,5 41:15
repaired 40:2	139:2,3,8	141:15 142:3,7	50:7
repeat 18:16	141:14 142:2	reservations 133:6,8 135:15	responsible 122:22
43:12	requesting 133:6 173:12	139:11,18,22	restating 93:13
rephrase 72:20	requests 135:20 136:4	140:9,13 143:3	restrict 44:14
reported 1:18	137:8,10	reserve 171:18	restricted 44:20 110:21
reporter 1:19	139:20 149:18	172:11 174:8,9	restrictions 152:2,9,10,22
1:20,20,21 2:5	require 85:12	174:11	result 29:12
2:6,7,7,8,9,10	121:12,20	resorts 1:4 6:22	129:12,17
2:11,12,13,14	122:5 124:8,15	194:4	158:3,7
2:16,17 4:14	125:8,12	resources 29:10,11,13,13	retained 22:4
5:7 7:10 11:14	127:12 128:6	29:17,19,20,21	58:12
189:2,21,21	128:13	30:1,3,5,14,16	return 190:11
reporting 189:16	required 42:21	30:18 31:1,5	194:13,16
represent 119:19	104:18 125:15	31:14 42:7	returned 120:12 122:11
representation 184:12,14	requirements 37:21 39:18,20	56:4	126:18 127:6
representative 56:14,17,20	42:3 44:17,21	respect 14:20	reuse 42:14
179:13 180:1	126:6,14	22:16 31:13	review 12:6,7
representing 7:8 182:13,18	requires 125:15,21	60:22 63:5	14:1,9,17
182:20	research 38:18	65:2,8 79:2,16	117:4 177:5
represents 99:17,21	39:3,10	143:20	194:7
103:20 108:1	reservation 70:7,15,20,22	respective 2:19	reviewed 11:21
129:13,17	71:2,4,7,8,10	respects 28:10	13:12 14:8,13
req 140:2	73:5,8,10,17	response 16:3	67:17 106:11
request 135:13	74:7 75:7,19	16:13 17:9,13	148:18
136:16 137:1,4	75:22 76:18,20	18:3,6,9 99:21	reviewing 87:16 172:21
141:2,14 142:1	77:12 135:13	100:14 102:3	reviews 64:6
	135:20 136:3	104:2 108:5,11	72:5 91:7
		111:1	
		responsibilities 33:15 36:21	

113:9 126:20 129:4 146:12 157:22 175:17 176:17 185:8 rex 176:7 ride 149:14 152:8,20 153:13,17 157:20 158:4 160:19 176:7 180:20 rides 149:21 152:1 153:2,3 156:11 158:12 158:15,19,20 159:2,3 160:20 right 9:5,15 10:19 14:15,22 15:1 22:19 26:1,5 27:17 28:6 32:10 33:1,13 38:2 49:21 50:12,18 52:20 53:15 54:16 55:2 62:1 63:22 65:4,20 66:3 67:7 70:10,15 70:22 71:14,20 72:4,9 78:4 79:5 80:17 82:13 83:3 84:10 86:4 88:19 89:10 92:6 93:6	94:13 101:14 103:1 105:7 107:9 117:13 121:18 125:17 128:11 131:19 134:12 136:19 137:5 138:8 143:4 147:9 151:13 155:10 156:12 157:17 163:16 164:2 165:14 166:11 168:18 172:14 173:12 174:3 180:4 183:20 186:22 rmr 1:18 189:19 road 3:16 roman 55:3 root 87:4 rough 25:8 routes 182:18 183:13 rpr 1:18 189:19 rsa 1:18 189:20 rt 1:19 189:20 rules 11:4 64:13 ruling 65:18 running 29:14 résumé 26:10	s s 3:1 6:2 87:22 131:1,1,1 191:2 192:2 sacks 50:18 sample 133:6 satellite 34:22 55:19 satellites 34:19 35:1,6,10 55:20 satisfy 37:21 saw 76:22 saying 12:17 54:6 59:13 64:1 65:17 93:8 105:22 108:21 116:22 121:11,19 123:11,11,15 142:19 145:17 148:8 153:8 155:17 168:10 168:13 172:10 180:6 says 17:10 26:19,21 52:15 53:1 55:4 63:4 63:15 65:12 68:18 70:16,19 71:1,5 72:13 73:2,7,16 74:4 77:9 79:6,8 80:7,15 81:9 81:11 82:2	84:7,13 86:2,7 86:14 87:22 89:5,6 90:3,8 93:21 96:11 97:6 98:8 99:16 101:16 101:17 102:19 103:7,14 107:22 108:14 121:16,17 123:1 129:7,16 129:17,19 133:5 134:4,15 135:6,15 136:9 136:22 137:7 138:3 144:10 146:2 153:11 153:15 154:22 155:1 157:8 158:13 159:1 161:18 166:12 173:22 179:10 179:20 182:11 scale 110:3,5 128:18,20,22 129:9 164:5 scenario 153:20,22 schedule 29:12 35:7 48:9 55:18,20 175:21 185:11 185:14 scheduled 49:1 49:4 70:1,18
---	--	---	--

72:15 73:15	scrollable	section 24:4	111:12 115:14
74:6 75:18	135:17 146:17	53:1 63:1	120:14,15
77:11 78:18,22	147:1 148:3	71:12 91:13,16	123:4,7 126:17
79:14 80:12	185:15	91:18 104:12	126:22 129:3,7
81:6,15 82:7	scrolled 185:13	104:21 109:11	132:18 133:13
85:6 88:17,21	186:2	114:18,20	133:15 134:1
89:3,7,18,21	search 41:19	141:22 156:4	135:14 137:21
90:2,9,12	searching	158:22 163:22	138:3 139:12
scheduling	151:18	sections 114:21	140:8,20,21
29:17,19 30:3	seats 171:17	141:10	141:1,12 144:5
30:22 31:1,2	172:10 173:4	security 34:21	144:7,14,17,22
31:11 34:17	174:9,11	42:21	145:1,3,17,20
35:9,12,20	sebo 1:18 2:5	see 24:6,11	146:6 149:10
47:13 54:20	7:10 189:1,19	32:9 46:4	149:15,16
55:2,6,12,14,22	second 23:7	52:15 56:16	150:1,4,8
56:4,10,11	45:4 61:11	62:18 63:1,3	151:21 154:13
181:1,3 183:21	69:6,11,12	63:11,18 64:8	154:18 157:13
184:8,10,19,21	75:10 77:4,20	66:11 69:18,21	157:14 158:21
schemes 119:19	78:6,14 79:4,7	74:1 76:15,16	163:17,18
scholar 20:16	79:9,21 80:1,8	76:20 77:15,17	164:10,19
school 32:1,4	80:16,22 81:1	78:1,12 82:1,2	165:19,21
36:16 38:1,4,8	81:10,11 82:3	83:4,5,6,9 84:5	166:3,8 167:21
38:9,14	82:4 83:6,7	84:6,16 85:17	169:4,10,11
scientist 33:1	84:8,14,22	86:14,17 87:18	171:13,19,20
36:22	85:3 86:3,15	87:20 88:2,20	178:6 179:10
scope 109:21	86:18,19 87:7	89:9 91:11	179:15 180:10
scott 3:4 8:3	87:18 88:19	92:4 93:1,18	180:11 181:3
scott.hughes	89:1,4 90:16	94:20,21 97:3	185:2,3 186:5
3:10	90:17 120:16	97:4,10 98:21	186:17,20
screen 133:6	125:19,21	98:22 99:12	seeing 27:6
135:16 145:19	126:3,7,8,15,19	100:15 102:11	seem 36:3
146:15,21	127:2,10 150:9	102:14,15	154:6,7 167:7
147:5 148:2	150:14 172:19	103:2,8,10,13	171:9
175:22	secret 42:21	103:18 105:14	seems 74:3
		108:12,13,14	163:19 171:8,9

select 13:14 87:4,10,11,20 87:21 88:3 134:13 143:3 155:9 156:10 156:20 160:8 170:4 172:16 selected 69:6 69:13 75:11 77:5 87:8 135:20 136:4 167:20 169:2 170:7 172:16 173:5 selecting 78:9 79:2,16,18 86:18 87:1 88:4 155:18 161:6,10 171:22 selection 80:15 125:9,16 selects 77:19 78:3,6 79:4,7 79:21 80:4,6 80:16,22 81:8 81:10,17 82:2 83:5 84:8,22 86:3,7,10,15 87:22 90:4 125:14,19 156:22 160:4 send 47:17 sense 27:2 29:16 44:20	46:14 185:18 sensitive 6:13 sent 47:22 194:14 sentence 63:15 65:20 66:4 68:18 69:21 70:3,4,16 71:9 71:11,15 72:12 73:1,7 98:7 108:13,14 114:12 116:7 116:17,18 129:10 133:14 134:4,21 135:6 135:22 136:22 137:6 139:15 141:12 142:4 142:12 144:5 145:11 146:2 146:20 147:10 149:16 150:8,9 151:5 152:13 152:20 153:4,7 154:18 155:11 156:8 158:22 161:18 164:4 168:13 sentences 148:5 september 1:15 4:5 5:5 6:6 194:3 sequence 61:14 154:16,20 155:2,5,7,10,15	155:18 156:2 157:10 159:10 159:19 160:8 160:15 161:21 sequences 161:16 sequential 28:4 28:6 61:14 serial 150:18 serve 51:3 57:14 session 4:13 set 28:16,17 69:6,7,11,12,14 75:10,11 77:4 77:5,20,20 78:6,7,14 79:4 79:7,8,9,22 80:1,6,8,16,22 81:1,10,11 82:3,4 83:6,7 84:9,9,14,22 85:1,3 86:3,8 86:15,16,18,20 86:21 87:7,8 88:19 89:1,4 90:16,17 124:18 125:5 125:19,20,21 126:1,3,7,8,9 126:15 138:7 139:1,7 162:1 174:14 179:12 179:22	sets 138:11 settled 58:4,22 several 105:1 151:1 shared 29:14 sheet 190:4,7,9 190:12 193:9 194:11 shock 47:18,22 shocked 48:1 shopping 176:21 shorthand 2:8 2:10 189:9 show 113:5 115:5 178:11 178:12 179:4,5 180:9 181:19 183:8,9 184:20 showing 116:2 148:10 176:2 180:15 shown 133:3 134:11 146:16 146:22 148:2 165:8 166:14 175:22 182:21 183:13 184:10 185:17 shows 182:16 183:15 sic 98:17 sick 48:11,21 side 60:12,21 102:12 185:3
--	---	--	--

186:18 sign 32:20 36:9 45:11 99:20 104:2 190:6 194:12 signature 189:19 193:11 signed 194:19 signing 190:8 sim 148:16,20 149:1,7,17 151:2,12,12,15 153:1 154:3,6 155:22 156:4 156:10,14,17 156:19 157:1 157:18 158:2 159:13 160:3 161:5,9,22 162:1 similar 44:6 84:18 85:8 similarly 39:5 84:7 112:4 simply 85:16 simultaneous 61:17 single 16:17,18 26:8 31:8 44:8 160:19 178:8 sitting 13:1 situation 153:15,18 situations 158:7	six 54:18 size 152:1,8,9 152:22 skill 24:21 25:2 52:16,20 53:7 53:10,14 54:8 skills 45:1 slices 31:4 small 102:22 software 26:17 30:18 33:18,19 34:3,12 35:6 37:4,6,9,10,11 37:14 38:5,7 38:11 39:3,10 39:15,17 40:2 40:5,7,12,13,16 40:19,20 41:1 41:5,6,7,9,10 41:13,19,19,22 42:10,10,14,15 42:17,22 43:4 43:5,7,10,11,14 43:18,21 44:3 44:5,7,8,11,13 44:16 46:22 47:4,7,10,20 49:8 50:6 54:20 55:2,6 55:12 77:19 78:2,5,9 79:4,6 79:21 80:4,6 80:16,22 81:7 81:9,17 82:2 83:5 84:8,21	86:3,7,10,15,19 89:7,15,17 90:1,8 125:14 125:19 solo 50:1,8 solution 39:19 39:21,22 solutions 7:8 7:11 44:18,20 194:23 solve 44:15 someone's 152:18 somewhat 29:16 sorry 98:19 106:14 182:2 sound 11:16 184:3 source 189:16 souvenir 176:22 space 35:17 190:4 specific 41:20 94:2,16 96:11 122:6 124:16 136:16 137:1 138:5,8,10,22 139:1,3,8 specifically 11:9 86:9 89:17 134:8 140:5 143:19 173:11	specification 40:4,10 72:13 76:4 77:9 79:18 80:9,21 81:3,12,21 82:5,12,17 83:9 84:20 85:4,12,15 95:18,18 96:21 97:16 105:1,2 105:16 106:6,7 109:15,17 110:9,10 111:13,16,20 112:8,16 115:6 115:10 116:8 118:12,22 121:6,7,22 123:17 127:21 128:1,1,5,12 138:14,15 141:9 specifications 28:18 40:18 specified 140:1 140:14 187:7 specifies 79:3 specify 137:14 specifying 137:15,17 spend 15:2 16:6 spent 15:17 187:10
--	---	--	--

spot 32:19 square 3:6 186:18 staff 33:1 36:21 standard 16:21 26:10 start 28:14 33:7 86:13 110:6 136:13 started 28:22 33:5,8,16 starting 25:19 27:8 70:4 140:17 141:1 149:11 150:4 154:10 166:5 171:17 172:4,7 starts 93:7 132:15 133:14 144:8,10 145:7 145:12,17 state 7:17,21 9:8 24:18 60:10 94:14 106:4 115:17 132:16 144:9 144:11 145:7 145:13,18 146:3,3 190:3 stated 105:6 106:3,9 statement 54:21 58:10 65:6 71:6 107:13 108:18	112:15 118:7 161:2 168:1 171:10 statements 70:12 95:3 108:20 174:5 states 7:2 65:21 69:19 70:6 71:15 78:2,5 88:9 93:9 94:15 118:3 127:10 139:16 141:13 143:18 145:12 147:11 150:15 152:6 160:17 173:2 stating 157:1 status 149:19 stay 77:14 80:13 162:11 stayed 38:22 stenographer 8:11,15 23:8 61:10,22 131:7 stenographic 7:20,20 step 40:11 89:6 89:12 139:1,2 139:21 140:12 steps 40:21 87:2 129:21 stops 47:17 store 150:16 151:8 176:22	stored 150:12 151:10 164:11 165:13 172:17 173:6 stores 150:5 151:3,12 165:17 street 3:7 strictly 99:11 100:8 101:20 strike 44:12 stroller 149:22 strongly 122:13 structure 39:22 139:20 structured 40:8 student 32:2 studio 101:4 studioworld 176:7 stuff 68:9 162:9 stunts 183:18 sub 101:9 subbullets 96:22 subject 20:20 21:1,2,20 29:7 190:8 submit 58:15 59:21 submitted 9:14 14:21 19:15,17 subscribed 193:15	subsequent 64:2 substance 193:8 substantial 94:3,5,17,19 95:1,5,8,10 96:1,6,13,15 97:17 99:18 100:6 101:13 101:18 103:21 104:10,16 105:4,8,12,16 105:17,22 106:8,17 107:6 107:11,19 108:2 109:9,18 109:21 110:2,6 111:10 112:10 112:17,20,22 114:5 115:6,11 116:9,11,12,20 117:1 118:10 118:14 119:9 119:10 120:3 120:20 123:6 123:18 substantially 86:22 91:13,19 92:1,5,8,13,18 93:22 95:21 97:7,15,19 98:18 99:9 100:11,18 101:1,2,10,18
---	---	--	---

101:21 102:7	81:20 121:4	systems 2:9	119:17 122:7
104:13,20	sure 10:17 11:5	t	126:18 136:11
105:3 107:16	11:18 15:12	t 131:1 139:7	140:6 141:21
107:17 108:8	19:16 32:16	140:2 176:7	143:5,7 153:14
108:15 110:12	33:2,6 35:16	189:1,1 191:2	155:22 164:10
111:4,8,14,17	36:8 40:13,15	191:2 192:2,2	166:22 167:1
111:21 112:2,5	51:11 52:14	table 91:3	talks 26:17
112:18 113:2,3	56:15 59:4	tags 150:19	110:18 122:8
113:13,15,22	61:1 66:15	take 6:17 35:4	124:2 127:2
114:7,14 115:1	76:9 87:15	35:6 48:13,22	133:2 140:18
115:3 116:3,18	107:8 113:8	49:4 84:15	143:17 145:16
117:9,12,18,22	119:4 128:21	162:5 165:19	151:15 153:11
118:4,10,16	134:1 141:8	181:10,16	156:17 166:5
120:22 121:3,5	155:17 164:3	182:1,3 185:7	tangentially
122:2 123:13	174:20 175:12	taken 66:21	64:21
124:22 125:6,9	181:18 182:5	130:14 173:21	teaches 168:3
125:16 126:2	182:11	175:2 189:4	team 41:7,16
126:10 127:17	suspect 15:17	193:5	technical 46:9
128:2	swore 189:5	talk 24:9,15	58:13
substantive	sworn 8:10,17	34:20 60:2,5	techniques
13:17 19:2,8	131:6 193:15	60:13,14,22	28:4
46:7	synchronous	74:18 102:6	technology
suffering 47:16	28:5	112:12 149:11	34:11 46:13,14
suggesting	syracuse 27:16	157:18	tell 8:11 44:22
172:2	27:22 38:22	talked 55:8	131:7 184:6
suite 3:16	39:7,12	61:8 147:4	189:6
summations	system 32:17	169:5	tells 119:8
166:6	42:6 43:6,16	talking 11:11	ten 15:15 182:8
sums 166:13	47:13 55:18,19	16:11 53:1	tennessee 2:15
supervision	68:14 69:4	74:3 76:6 80:9	term 18:4
189:10	93:1 149:2,18	82:9,22 90:11	76:20 78:12,19
support 16:2	151:2,12	97:17 99:15	82:1 83:2,4
16:13 17:8	152:10,14	103:19 109:11	84:16 85:1,17
supposed 48:13	153:1,5,20	114:4,13	85:19,20,20
59:7 60:9	163:15,18	115:14 117:15	87:4,10,11,20

87:21 88:3 91:19 97:15 99:15 102:6 104:12,19,20 110:11 113:15 113:16,21,22 114:7 116:3 117:8,18 118:9 121:3,5,9,12 128:2 177:13 terminal 164:12,18,20 terminals 149:12 terminology 64:14 terms 82:17,19 107:9 test 40:18,18 testified 8:13 25:10 57:21 58:7,9 59:1,5 131:9 testify 22:12 65:1 66:10 testifying 10:22 22:1,7,8,16 testimony 59:9 59:14,14,17,19 62:12,15 63:5 63:12,21 64:11 64:14 189:8,12 194:9,17 testing 40:17	texas 2:15 thank 8:15 181:5 187:19 theater 180:15 180:16 theme 101:5,6 163:16,20 164:1,6 187:15 thesis 28:8 38:18,20 39:2 39:4 thing 26:8 52:21 80:18 112:3,6 117:1 157:5 things 12:11 17:1 19:6 26:5 30:20 42:4 46:1 51:20 64:10 86:6,7 101:7 105:18 107:18 109:19 111:6 114:1 136:3 163:15 176:15 179:2 184:5 186:21 think 21:21 22:3 23:1 25:14 45:20 47:9 55:13,16 56:2,13 60:16 61:7 71:5 72:18 76:2 82:15 87:9 89:22 101:15	104:11 107:12 108:19 109:22 110:20 111:3 111:19 112:7 112:14,15,19 116:17 121:15 129:16 130:6,8 136:8 142:19 147:19 148:6 152:9 153:14 154:22 159:15 161:1,2,8 174:13,15 177:17 178:14 181:6 183:4 187:12 thinking 22:21 third 56:13 99:6,7 184:7 thirteenth 3:7 thirty 190:13 thought 13:12 49:2 170:18 thoughts 16:22 thousands 26:20 31:9 three 15:19 21:13 25:14 67:16 87:9,12 186:19 thursday 1:15 4:5 5:5 6:6 time 2:6,9 6:15 7:17 15:13 16:5,8 19:15	19:17 20:7 23:18 24:21 31:4,22 32:1 33:11 34:10,13 35:3,18 36:4 36:15,19 37:5 38:3,10,13,14 39:14 47:2,5 49:1 50:6 53:2 59:9 65:11 66:13,19 67:3 67:14 70:2,8 70:18 71:16,19 71:22 72:3,15 72:21 73:2,15 73:18,21 74:6 74:8,16 75:18 77:12 78:12,18 79:1,14 80:12 81:6,15 82:8 85:7 88:18,22 89:3,7,15,18,21 90:2,4,4,9,12 130:11 131:12 136:6,16 137:1 137:5,9,11,12 137:15,16,18 138:5,8,10,11 138:22 139:2,3 139:3,8,8 140:1,14 141:3 141:15,19 142:3,6,11 143:9 149:14 150:19,20
--	---	---	--

151:20 154:16 155:2,15 156:2 158:15 175:6 180:9 184:20 185:19,21 187:6,17 188:2 189:4 194:18 timeframe 194:8 timereq 138:7 139:1,7 140:2 140:2,7,15 142:1 154:3 times 25:6,9,13 25:14 31:3 74:11 75:6,21 77:2 78:9 122:17,18 title 32:22 33:2 33:4 46:17,20 titled 102:16 tn 1:20 189:21 today 7:10 9:13 11:1,20 128:8 told 41:12 54:6 took 15:18 49:4 49:6 tool 37:14,15 37:17 43:8 tools 28:16 top 27:8 42:21 145:2 169:5 topics 65:3 touches 65:14	tour 176:7 187:7,8 towards 149:10 trademark 7:3 trademarks 45:22 traffic 34:18 35:9,15 55:17 transcribe 11:15 transcribed 189:10 transcript 189:15 190:14 190:15 194:6 194:19 transcription 189:11 193:4 transmitted 139:17 travel 122:17 trial 1:2 21:12 21:13 25:11 50:11 57:22 58:5 59:1,6 60:3,6,14,22 65:19 189:18 tried 34:15 63:16 109:10 true 179:1 189:12 truth 8:12,12 8:13 131:7,8,8 189:6,6,7	truthfully 10:22 trying 44:15 151:14 tuesday 11:22 13:7 turn 32:6 52:11 69:15 88:5 132:10 137:20 144:16 179:8 two 15:5 29:2 35:2,16 38:17 48:12 54:22 55:4 81:19 93:1 102:21 105:18 109:18 126:5,5,13 141:10 148:5 174:5 183:19 183:20 tx 1:20 189:21 type 46:15 116:4 122:14 types 33:19 51:19 157:16 164:2 179:17 typically 46:1 51:22 53:9 70:1,17 72:14 73:14 74:5 75:17 77:11 78:17,22 79:13 80:11 81:5,14 82:7 85:6	typo 16:18 26:16 typos 17:1 19:6 26:15 27:5 u u.s. 1:4,11 6:22 10:10 194:4 ultimately 28:17 168:5 169:16 um 139:14 unallur 118:4 unalluring 98:19 99:3,5 99:10,15,16 100:4,7 103:17 103:19 107:19 108:1,16 109:5 109:7 110:17 110:19 111:9 111:11,15 112:4 117:13 118:1 uncertified 189:18 unclear 138:13 under 8:10 10:19 55:3 103:3 158:10 172:20 189:7 189:10 193:6 understand 9:12 10:16,18 11:5,6 17:7 24:18 25:1
--	---	---	--

88:13 104:7 163:9 183:2 understanding 24:16 53:21 unexpected 157:12 159:12 unit 6:19 united 7:2 university 27:13,17,22 31:19 38:22 39:7,12 unreportable 61:17 ups 181:10 use 11:13 42:2 42:15 44:1,3 54:9 78:19 87:3 107:8 113:16 116:16 119:3 149:12 165:22 166:5,7 166:10,12,13 167:2 172:18 173:7 used 29:10,11 31:5 52:19 104:19 119:5 157:10 159:10 166:18 177:13 187:13 189:18 190:16 194:19 user 68:15 72:3 72:17 74:12,21 76:21 132:21	133:2 134:10 134:12 135:16 136:5,11 137:10,11,15 137:16 141:18 143:3,12 144:12,22 145:18 146:5,7 146:15,19 147:18 148:2,8 149:12 150:6 150:17 151:8 153:9,22 154:17,21 155:5,8,9,12,16 155:18 156:3,5 156:19,21,22 158:11,14 159:19,21 160:14 161:6 161:10,21,22 168:5 169:6 170:3,7 user's 157:10 159:10 161:15 users 152:11,12 153:6,6,9,21 154:1 156:10 158:11 160:17 167:4 uses 43:4 85:1 113:15 153:1 using 43:7 166:1	usually 43:15 utilities 42:1,5 42:11,16 43:4 utility 122:8 123:3,5,7 124:2,4,9,14 125:1 129:8 v v 1:6 194:4 validity 22:12 51:4 58:3,14 59:15 63:7 66:10 value 120:12 122:11 127:6 127:13 128:6 128:13,18,20 128:22 values 126:18 128:17 variable 138:7 138:22 139:6 140:1,3,6,14 variant 87:10 87:19,21 88:2 variety 119:17 166:6 various 30:12 40:1 49:5,8 143:18 161:11 167:2 183:14 183:22 184:21 verification 28:5 56:6	verify 194:9 veritext 7:8,11 194:14,23 veritext.com. 194:15 versus 7:1 60:17 61:5 video 6:10,16 videographer 3:22 6:9 7:9 8:19 23:10,17 66:18 67:2 130:10 131:11 174:21 175:5 188:1 videorecorded 6:20 videotaped 1:13 2:1 vienna 3:17 view 105:19 106:12 185:13 185:17 viewing 133:7 violates 97:8 110:14 violence 98:11 98:14 114:11 115:21 184:2 virginia 3:17 virtual 140:19 141:4,16 142:4 142:8 visit 48:14 70:1 70:9,18 71:13
--	--	--	--

71:16 72:1,14 73:3,15,19 74:6,9,12,17 75:17 77:11 78:17,22 79:14 80:12 81:5,14 82:7 85:6 135:11 136:6 167:5 visiting 31:15 176:22 visitor 149:12 visitor's 122:22 visitors 68:20 101:4 149:19 visual 142:7 vs 4:4 5:4 191:1 192:1	wants 39:19 washington 2:4 2:16 3:8 6:5 7:6 watch 177:20 water 162:9 176:6,6 183:17 184:17 186:9 186:10 way 16:21 46:5 113:2 123:5,6 124:5 125:2,3 125:4,8,15 137:14,19 waytena 132:3 132:7,11 139:5 141:9,21 142:20 we've 23:21 55:8 66:11 73:13 74:15 75:1 109:11 110:3 120:2 145:22 173:14 welcome 187:21 went 18:14 32:4,18 37:5 38:9,21 45:10 49:11,19 50:10 west 176:7 wet 184:3 whatsoever 27:2	wheelchair 149:22 when's 67:14 whispering 6:13 wide 119:13 wild 176:7 wish 10:2 160:4 161:6,11 witness 4:15,17 8:17 23:6 53:3 57:10,14,16,17 58:2 60:20 61:7,12 62:8 64:6,8 66:9 72:5,12 91:7 95:13 113:9,11 117:3,5 126:20 126:22 129:4 146:12,14 157:22 158:2 162:10 172:20 173:1 174:20 175:17,19 176:17,19 177:4,6 181:8 182:8,11 185:8 185:10 187:21 188:5 189:5,8 189:13 190:1 193:1 194:8,10 194:12,18 wolf 2:2 7:6 50:17	word 16:17 words 93:1 153:21 work 26:4 28:8 28:11 32:11,18 35:8 37:7 38:15,16 39:1 39:8 41:4 43:1 43:10,12 45:10 46:15,19,22 47:4 50:17 51:9,14 53:3,5 54:9 55:17,19 55:21 worked 20:2,17 21:11 33:17 34:3,17 35:14 36:1,8,13,16,18 38:1 39:2 46:11,15 47:3 47:11 48:6 50:6 52:7 55:14 56:17 57:3,15,16,20 58:2,11 working 32:2,6 32:18 33:10,12 37:11 38:4,6 39:5,9,13 41:13 42:19 45:12,21 46:14 47:8,12,20 48:7,16 49:14 50:8 52:1 122:20
w			
wa 1:20 189:22 walker 3:22 7:7 walt 1:4 4:4 5:4 6:22 13:19 191:1 192:1 194:4 want 28:15,20 61:8,21 87:15 107:8 136:6 167:13 171:18 172:11 174:8,9 174:17 182:1 184:6 wanted 37:16 59:4 104:17 113:19 135:11			

wright 13:4	year 166:2
write 16:17,21 18:5 44:19	years 20:2,3,6 20:18,19 21:14
writing 39:4,11 40:11 41:6,18 42:8,14 46:22	34:4 45:8 47:11 49:10 54:18,22 55:5 56:18
written 16:20 40:12 41:11 42:22 94:9	yesterday 12:1
wrong 48:20 118:20	york 2:13,14 36:18
wrote 26:19 35:5 41:9 46:12	young 20:6
y	z
yeah 18:17 21:21 24:17 26:6 35:11 44:8 46:19 55:13 56:2 65:17 68:17 70:11 76:16 91:11 97:4 99:13 100:16 102:19 119:2 120:15 135:6 142:19 143:10 145:1,20 154:5 157:14,18 158:5 166:20 167:14,22 168:11 169:11 178:2,14 179:20 183:4 184:9 186:20	zero 99:19 104:1 zheng 63:7

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.