

In the Matter Of:
WHATFIX INC. vs WALKME LTD.

DR. HOMAYOON BEIGI

June 26, 2024

Vol.2

IPR2024-00065
WHATFIX INC. v. WALKME LTD.
WALKME LTD. EXHIBIT 2004
1 of 28



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

WHATFIX INC.,

Petitioner,

v.

WALKME LTD.,

Patent Owner.

Volume 2

VIDEOTAPED DEPOSITION OF DR. HOMAYOON BEIGI

DATE: June 26, 2024

TIME: 10:06 a.m.

PLACE: 405 Lexington Avenue, New York,
New York

BEFORE: Rebecca Schaumloffel, RPR, CCR-NJ

JOB NO: J11386749

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

MORRISON FOERSTER
Attorneys for the Plaintiff
707 Wilshire Boulevard
Los Angeles, California 90017
BY: JEAN NGUYEN, ESQ.
MEHRAN ARJOMAND, ESQ.

AMSTER, ROTHSTEIN & EBENSTEIN
Attorneys for the Patent Owner
405 Lexington Avenue
New York, New York 10174
BY: CHARLES MACEDO, ESQ.
THOMAS HART, ESQ.

ALSO PRESENT:

Ziv Glazberg, Esq.
Lilach Danzig, Esq.
Bryamz Villanueva, videographer

* * *

1 H. BEIGI

2 THE VIDEOGRAPHER: We are now on 10:06AM

3 the record. The time is 10:07 a.m. 10:06AM

4 This begins Media Number 1 to the 10:06AM

5 videotaped deposition of Homayoon 10:06AM

6 Beigi taken in the matter of Whatfix 10:07AM

7 Inc. versus Walkme Ltd. 10:07AM

8 My name is Bryamz Villanueva; 10:07AM

9 I'm the videographer today. The court 10:07AM

10 reporter is Rebecca Schaumloffel. All 10:07AM

11 appearances are noted on the 10:07AM

12 stenographic record. 10:07AM

13 HOMAYOON BEIGI, called as a witness, having

14 been first duly sworn by a Notary Public of

15 the State of New York, New Jersey, and

16 Pennsylvania was examined and testified as

17 follows:

18 EXAMINATION BY 10:07AM

19 MS. NGUYEN: 10:07AM

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

21 A. Good morning. 10:07AM

22 Q. Are you presently under the 10:07AM

23 influence of alcohol or medication that would 10:07AM

24 impair you to testify here today? 10:07AM

25 A. No. 10:07AM

1 H. BEIGI

2 Q. And you understand that you have
3 taken an oath to tell the truth?

4 A. Yes.

5 Q. And is there any reason you cannot
6 give complete and accurate testimony today?

7 A. No.

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

11 A. No, not at all.

12 Q. Dr. Beigi, do you recall yesterday
13 discussing with patent owner's counsel and
14 patent owner's counsel asking why you made a
15 second Declaration with respect to the
16 '664 patent?

17 A. Yes.

18 Q. And with respect to the
19 '664 patent, patent owner's counsel asked you
20 yesterday, quote, "Why did you make a second
21 Declaration? Why didn't you just include it
22 in the first Declaration, whatever you put in
23 there?"

24 Do you recall that?

25 A. Yes.

1 H. BEIGI

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

5 And that was in quotes. 10:08AM

6 A. Yes. 10:08AM

7 Q. Do you recall that? 10:08AM

8 A. Yes. 10:08AM

9 Q. I wanted to ask you a few 10:08AM
10 questions about the term "afterthought." 10:08AM

11 A. Yes. 10:08AM

12 Q. By afterthought, were you simply 10:08AM
13 referring to the second '664 Declaration 10:08AM
14 being filed after the first '664 Declaration? 10:08AM

15 A. Ask the question again. I want to 10:09AM
16 make sure that I'm answering properly. 10:09AM

17 Q. Yeah. Okay. 10:09AM

18 So by using the term 10:09AM
19 "afterthought," were you simply referring to 10:09AM
20 the second '664 Declaration being filed after 10:09AM
21 the first '664 Declaration? 10:09AM

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

23 A. It was -- it was a continuation. 10:09AM
24 It was the second -- the second Declaration. 10:09AM

25 THE COURT REPORTER: Doctor, 10:09AM

1 H. BEIGI

2 I just need you to speak up. Okay?

10:09AM

3 THE WITNESS: Sorry, yes. It

10:09AM

4 was --

10:09AM

5 THE COURT REPORTER: I have the

10:09AM

6 answer. Thank you.

10:09AM

7 BY MS. NGUYEN:

10:09AM

8 Q. And your reference to

10:09AM

9 "afterthought," it was not a statement about

10:09AM

10 the merits of the second '664 Declaration,

10:09AM

11 right?

10:09AM

12 MR. MACEDO: Objection to form.

10:09AM

13 A. No, it wasn't a reconsideration,

10:09AM

14 if that's what you are asking. It wasn't

10:10AM

15 reconsidering the '664 in any way, like

10:10AM

16 rethinking it.

10:10AM

17 MR. MACEDO: Doctor, do you mind

10:10AM

18 speaking a little louder? It's kind

10:10AM

19 of hard to hear you. Sorry. The

10:10AM

20 microphone doesn't project. It only

10:10AM

21 records.

10:10AM

22 BY MS. NGUYEN:

10:10AM

23 A. Sorry.

10:10AM

24 Yes, it wasn't a reconsideration.

10:10AM

25 It was -- it was just that somethings to add

10:10AM

1 H. BEIGI

2 to -- you know, to the first -- to the first
3 Declaration, basically. I would call it
4 maybe supplemental.

5 Q. Okay.

6 A. I don't know the lingo, but to me
7 it is like a supplemental Declaration, like
8 continuation of the Declaration.

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

11 A. Yes, I do.

12 Q. Okay. So you would never refer to
13 the Declaration, the second '664 Declaration,
14 as an afterthought Declaration or -- yeah, as
15 counsel did yesterday, right?

16 MR. MACEDO: Objection to the
17 form.

18 A. So maybe we have a different
19 definition of what an afterthought -- an
20 afterthought is. So I -- I basically -- it
21 is a supplement -- I would classify it as a
22 supplemental, as a continuation, as a --
23 something that was missing and I have to put
24 in.

25 Q. Okay. Dr. Beigi, do you recall

1 H. BEIGI

2 yesterday Patent Owner's counsel asking you 10:11AM

3 what does human natural language mean? 10:11AM

4 A. Yes. 10:11AM

5 Q. And when asked, you said, quote, 10:12AM

6 "It is what we are using right now to 10:12AM

7 communicate, you and I"? 10:12AM

8 A. Yes. 10:12AM

9 Q. Patent Owner's counsel then asked 10:12AM

10 you, quote, "So would you" -- sorry, quote, 10:12AM

11 "So would a form where you fill in name, 10:12AM

12 address, telephone number, would that be 10:12AM

13 human natural language?" 10:12AM

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

15 Do you recall that testimony? 10:12AM

16 A. Yes. 10:12AM

17 Q. I want to ask you some more 10:12AM

18 questions about that testimony. 10:12AM

19 There is a difference between 10:12AM

20 communication between a person and a chatbot 10:12AM

21 compared to a form that is subsequently 10:12AM

22 filled out by an RPA based on that 10:12AM

23 communication. 10:12AM

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

25 Q. Correct? 10:12AM

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H. BEIGI

MR. MACEDO: That's leading,
Counsel.

A. Yes.

Q. And is that what you meant, that a
form where you fill in --

MR. MACEDO: Objection.

Q. -- name, address, telephone number
is not a human natural language?

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

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

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

10:12AM
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1	H. BEIGI	
2	That's really inappropriate.	10:13AM
3	MS. NGUYEN: Counsel --	10:13AM
4	BY MS. NGUYEN:	10:13AM
5	Q. Can we go back to the question?	10:13AM
6	Okay.	10:14AM
7	So before I was interrupted,	10:14AM
8	Dr. Beigi, is that what you meant, that a	10:14AM
9	form where you fill in name, address,	10:14AM
10	telephone number is not a human natural	10:14AM
11	language?	10:14AM
12	MR. MACEDO: Objection to form.	10:14AM
13	A. Like I said, filling a form is not	10:14AM
14	human natural language unless the form is	10:14AM
15	asking you to type in something that it would	10:14AM
16	understand, which would be free form.	10:15AM
17	So by the word "form," I don't	10:15AM
18	mean free form. So free form meaning you can	10:15AM
19	just type in anything you want and it will	10:15AM
20	understand. That would be natural language.	10:15AM
21	If it's a form where you would just have the	10:15AM
22	choice of just that one thing that you would	10:15AM
23	either click or select or something like	10:15AM
24	that, that's what I call a form.	10:15AM
25	As long as there is natural	10:15AM

1 H. BEIGI

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

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

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

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

25 If it picks something from 10:16AM

1 H. BEIGI

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

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

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

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

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

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

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

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

24 A. Yes. 10:18AM

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

1 H. BEIGI

2 A. It says Khoros or Khoros Staff. 10:18AM

3 I'm not sure if there is a person that's 10:18AM

4 associated with it. Unless I'm missing it 10:18AM

5 somewhere. I mean, it is customary under the 10:18AM

6 title to put the author, and it says -- I'm 10:19AM

7 not sure if it is Khoros or Khoros Staff. 10:19AM

8 Q. Is the individual author defined 10:19AM

9 in Exhibit 19? 10:19AM

10 A. Unless the person's last name is 10:19AM

11 Staff and his first name is -- or her first 10:19AM

12 name is Khoros, then not. It seems like it 10:20AM

13 may be a staff writing it. I can't tell 10:20AM

14 based on that. 10:20AM

15 Q. So you don't know who is making 10:20AM

16 the statements in Exhibit 19, correct? 10:20AM

17 A. Yes, I'm not sure if it is a group 10:20AM

18 of people, staff of people, or the person's 10:20AM

19 last name is Staff. 10:20AM

20 Q. Dr. Beigi, do you recall yesterday 10:20AM

21 counsel for Patent Owner asking you about the 10:20AM

22 purpose or the point of Allen? 10:20AM

23 A. Yes. 10:20AM

24 Q. And counsel asked you whether the 10:20AM

25 point of Allen is a simple way to teach an 10:20AM

1	H. BEIGI	
2	automation process.	10:20AM
3	Do you recall that?	10:20AM
4	A. Somewhat. Yes.	10:20AM
5	Q. And when asked, you testified,	10:20AM
6	quote, "Yes, but I have to first teach it."	10:21AM
7	Do you recall that testimony?	10:21AM
8	A. Yes.	10:21AM
9	Q. Then counsel asked whether the	10:21AM
10	conversation of how a user can implement	10:21AM
11	Allen to automate buying a book is pertinent?	10:21AM
12	A. Yes.	10:21AM
13	Q. And then you testified that,	10:21AM
14	quote, "Part of the point of Allen is that it	10:21AM
15	is flexible and it will find the places where	10:21AM
16	it actually has to put the book title."	10:21AM
17	A. Yes.	10:21AM
18	Q. Do you recall that?	10:21AM
19	A. Yes.	10:21AM
20	Q. Would you agree that Allen is not	10:21AM
21	directed to only teaching an automation	10:21AM
22	process?	10:21AM
23	MR. MACEDO: Objection to form.	10:21AM
24	Leading.	10:21AM
25	A. Yes.	10:21AM

1 H. BEIGI

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

6 A. Yes. 10:22AM

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

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

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

11 A. Yes. 10:22AM

12 Q. Do you have the exhibit for the 10:22AM
13 '732 patent available? 10:22AM

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

16 MR. MACEDO: Exhibit 9. 10:22AM

17 Q. Exhibit 9. 10:22AM

18 A. Yes, I do. 10:22AM

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

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

25 Q. Line 59. 10:23AM

1 H. BEIGI

2 A. Yes.

10:23AM

3 Q. Of the '732.

10:23AM

4 A. Yes.

10:23AM

5 Q. And column 4, line 59 of the '732

10:23AM

6 reads, "One technical problem dealt with by

10:23AM

7 the disclosed subject matter is to provide

10:23AM

8 for a user-friendly manner of defining

10:23AM

9 functionality of chat bots" --

10:23AM

10 A. Yes.

10:23AM

11 Q. -- right?

10:23AM

12 And you recall reading that

10:23AM

13 yesterday to counsel?

10:23AM

14 A. I do.

10:24AM

15 Q. And then counsel for Patent Owner

10:24AM

16 asked and directed you to column 5, line 49,

10:24AM

17 of the '732 patent.

10:24AM

18 A. Yes.

10:24AM

19 Q. And column 5, line 49, of the '732

10:24AM

20 reads, "Another technical problem may be to

10:24AM

21 enable defining automation processes in a

10:24AM

22 manner that enables them to be implemented

10:24AM

23 even if changes are performed to the

10:24AM

24 underlying platform."

10:24AM

25 A. Yes.

10:24AM

1 H. BEIGI

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

4 A. Yes. 10:24AM

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

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

9 Q. If I can have you turn to 10:24AM
10 column 8, line 38, and read the sentence 10:24AM
11 starting at column 8, line 38 out loud, 10:25AM
12 please. 10:25AM

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

17 Shall I continue? 10:25AM

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

19 Would you agree that the 10:25AM
20 '732 patent discloses that there are 10:25AM
21 additional technical problems? 10:25AM

22 A. Yes. 10:25AM

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

25 THE VIDEOGRAPHER: We are going 10:25AM

1	H. BEIGI	
2	off the record. The time is	10:25AM
3	10:26 a.m.	10:25AM
4	(Whereupon, a recess was held.)	10:25AM
5	THE VIDEOGRAPHER: We are going	10:48AM
6	back on the record. The time is	10:49AM
7	10:49 a.m.	10:49AM
8	MS. NGUYEN: We have no further	10:49AM
9	questions, and we pass the witness to	10:49AM
10	Patent Owner.	10:49AM
11	MR. MACEDO: Great.	10:49AM
12	EXAMINATION BY	10:49AM
13	MR. MACEDO:	10:49AM
14	Q. One question, are you satisfied	10:49AM
15	that your testimony yesterday and today is	10:49AM
16	truthful, accurate, and complete?	10:49AM
17	A. Yes.	10:49AM
18	MR. MACEDO: We are done.	10:49AM
19	THE VIDEOGRAPHER: This	10:49AM
20	concludes the deposition of Homayoon	10:49AM
21	Beigi. We are going off the record at	10:49AM
22	10:50 a.m.	10:49AM
23	(Whereupon, at 10:50 a.m., the	
24	Examination of this Witness was	
25	concluded.)	

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H. BEIGI

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

MS. NGUYEN: Agreed.

HOMAYOON BEIGI

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

NOTARY PUBLIC

H. BEIGI

I N D E X

EXAMINATION BY	PAGE
MS. NGUYEN	329

INFORMATION AND/OR DOCUMENTS REQUESTED

INFORMATION AND/OR DOCUMENTS	PAGE
(none)	

H. BEIGI

C E R T I F I C A T E

STATE OF FLORIDA

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

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

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

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

Rebecca Schauloffel

REBECCA SCHAUMLOFFEL

1 ERRATA SHEET FOR THE TRANSCRIPT OF:

2 Case Name: Whatfix v. WalkMe

3 Dep. Date: June 26, 2024

4 Deponent: HOMAYOON BEIGI

5 CORRECTIONS:

6 Pg.	Ln.	Now Reads	Should Read	Reason
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7	—	—	—	—
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8	—	—	—	—
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9	—	—	—	—
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17			_____	
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18 Signature of Deponent

19

20 SUBSCRIBED AND SWORN BEFORE ME

21 THIS ____ DAY OF _____, 2024.

22

23 _____

24 (Notary Public) MY COMMISSION EXPIRES: _____

25

1	5	22, 23	August	board
		accurate	338:20	335:17
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