In the Matter Of:

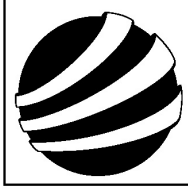
WHATFIX INC. V. WALKME LTD.

IPR-2023-01368

HOMAYOON BEIGI

November 11, 2024

IPR2024-00065
WHATFIX INC. v. WALKME LTD.
WALKME LTD. EXHIBIT 2020
1 of 338



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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

----------X

WHATFIX INC.,

Petitioner,

v. IPR2023-01368
Patent 10,819,664 B2

WALKME LTD.,

Patent Owner.

----------X

DEPOSITION OF HOMAYOON BEIGI

November 11, 2024

Reported by:

MARY F. BOWMAN, RPR, CRR

JOB NO. J11937107

H. Beigi - 11.11.24

November 11, 2024

9:09 a.m.

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

H. Beigi - 11.11.24

APPEARANCES:

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.
DARREN HABER, ESQ.

ALSO PRESENT:
Ziv Glazberg, Esq.
Ivan Zatkovich

H. Beigi - 11.11.24

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

H. Beigi - 11.11.24

Dr. Homayoon Beigi from IPR2023-01379 associated with U.S. Patent Number 11,258,732 B2. 09:10

(Exhibit 23, document entitled "Notice of Deposition of Dr. Homayoon Beigi," marked for identification, as of this date.) 09:10

MR. MACEDO: And I'm going to mark as Beigi Exhibit 24 patent owner's notice of second deposition of Dr. Homayoon Beigi from IPR2024-00065 for Patent Number 11,558,317 B2. 09:10

(Exhibit 24, document entitled "Notice of Deposition of Dr. Homayoon Beigi," marked for identification, as of this date.) 09:11 09:12

Q. And, Dr. Beigi, do you recognize Exhibit 22? 09:12

A. Yes, I do. 09:12

Q. And how do you recognize it? 09:12

A. I was given a copy by the counsel. 09:12

Q. And do you recognize Exhibit 23? 09:12

A. Yes. 09:12

Q. And how do you recognize it? 09:12

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

H. Beigi - 11.11.24

Beigi Exhibit 25 the deposition transcript of Homayoon Beigi from June 25, 2024. 09:13 09:14

(Exhibit 25, deposition transcript of Homayoon Beigi, dated June 25, 2024, marked for identification, as of this date.) 09:14 09:14 09:14 09:14

Q. And ask if you recognize it. 09:14

MS. NGUYEN: Counsel, is there a reason why Dr. Beigi is -- 09:14 09:14

MR. MACEDO: Single-sided because it's the exhibit, and I gave you double-sided so you didn't have to copy so much. 09:14 09:14 09:14 09:14

MS. NGUYEN: Thank you. 09:14

MR. MACEDO: And, Counsel, we did that with all the exhibits that were marked. 09:15 09:15 09:15

A. Yes, it seems to be the transcript of my last deposition. 09:15 09:15

Q. And have you reviewed that transcript before today? 09:15 09:15

A. I have. 09:15

Q. And did you find any mistakes or errors in the transcript? 09:15 09:15

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

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

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

Q. Okay. 09:16

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

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

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

A. Yes, I do. 09:17

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

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

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

A. Yes. 09:17

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

A. Same thing, yes. 09:17

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

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

H. Beigi - 11.11.24

So I'm not sure whether there were errors in this one. Definitely the other one, bigger transcript, definitely had errors. This one may have had just a few as well, but I don't remember any at this point. 09:17 09:18 09:18 09:18 09:18

Q. And did you note any errors in the transcript in any of your reply declarations that were submitted in these cases? 09:18 09:18 09:18

A. No. 09:18

Q. Let's go ahead and mark your reply declarations. 09:18 09:18

MR. MACEDO: So we are now going to mark as Beigi Exhibit 27 the Reply Declaration of Dr. Homayoon Beigi for IPR2023-01368 relating to U.S. Patent Number 10,819,664. 09:18 09:19 09:19 09:19 09:19

(Exhibit 27, document entitled "Reply Declaration of Dr. Homayoon Beigi," marked for identification, as of this date.) 09:19 09:19 09:19 09:19

MR. MACEDO: I'm going to mark as Beigi Exhibit 28 your Reply Declaration of Dr. Homayoon Beigi from Inter Partes Review Number IPR2023-01379 relating to 09:19 09:19 09:20 09:20

H. Beigi - 11.11.24

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

(Exhibit 28, document entitled 09:20

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

marked for identification, as of this 09:20

date.) 09:20

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

mark as Beigi Exhibit 29 the Reply 09:20

Declaration of Dr. Homayoon Beigi Inter 09:20

Partes Review Number IPR2024-00065 Patent 09:20

Number 11558317. 09:20

(Exhibit 29, document entitled 09:20

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

marked for identification, as of this 09:20

date.) 09:20

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

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

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

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

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

Are you done reviewing? 09:22

A. Yes. 09:22

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

Beigi Exhibit 27? 09:22

A. Yes, I do. 09:22

H. Beigi - 11.11.24

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

it, which says, "Original Exhibit," so we know this is the original, not a photocopy. 09:24

A. Yes. Thank you. 09:24

Q. Okay. And when we refer to the '664 patent, you are referring to Beigi Exhibit 8, correct? 09:24

A. Yes. 09:24

Q. Okay. And during these proceedings, that was marked as Exhibit 1001 at the bottom of the page. 09:24

A. Yes. 09:24

Q. Okay. So you said you recognized Beigi Exhibit 27 as relating to Beigi Exhibit 8 IPR reply declaration, correct? 09:24

A. Yes. 09:24

Q. Okay. And have you reviewed in preparation for today's deposition Beigi Exhibit 27? 09:24

A. Yes. 09:24

Q. And did you find any mistakes or errors which need to be corrected? 09:24

A. No. 09:25

Q. And do you testify here now that, in your opinion, everything in Beigi Exhibit 27 is 09:25

truthful and correct to the best of your ability? 09:25

A. To the best of my ability, yes. 09:25

Q. And that there are no errors in it? 09:25

A. As far as I know, no. 09:25

Q. And do you believe that you fully complied with your obligations in preparing Beigi Exhibit 27 to the PTAB in terms of the information you provided? 09:25

A. I'm not sure if I understand the question. Sorry. 09:25

Q. Well, do you understand that you had any obligations to provide any specific information when you submitted Beigi Exhibit 27 for use in IPR2023-01368? 09:25

A. What do you mean by "specific information"? I'm sorry. 09:25

Q. Is there anything that you need to do as an expert to submit, like providing if you are being paid, for example? 09:25

A. Yes. In the introduction of the declaration, I have provided information -- such information. 09:26

Q. You -- talking about paragraph 2? 09:26

H. Beigi - 11.11.24

A. Paragraphs 1 and 2, being retained and I'm being paid. 09:26

Q. And in paragraph 2, you say, "I am being paid at my standard consulting rate." 09:27

Correct? 09:27

A. Yes. 09:27

Q. But you didn't say what the standard consulting rate was. 09:27

A. We spoke about this in the last deposition. It's the same rate. 09:27

Q. And what is that rate? 09:27

A. Like I mentioned in the previous deposition, because there is a third party involved, which is -- which is IMS Experts, that I'm retained through, there is a markup that they do. 09:27

So my standard rate, I'm not sure what excess payment I miss for that rate, but my standard rate is standard to IMS, and I'm obligated not to produce that because, of course, because they mark it up. 09:27

However, I gave you a ballpark last time, and it's the same ballpark. It's on record. 09:28

H. Beigi - 11.11.24

Q. So you are intentionally not providing the amount of money that you are being paid as you're standard rate because it would violate your NDA with the service that retained you, is that it? 09:28

A. That's correct. 09:28

Q. And so the board does not have what your standard consulting rate that you're charging is in the record because you consider it a violation of an NDA, correct? 09:28

A. The exact amount cannot -- yeah, because of the NDA, I cannot produce the exact amount. 09:28

I did give you a ballpark figure in our last deposition because I was forced to by continuously asking to do so. 09:28

Q. And I'm going to continuously ask you again if you don't say it now. 09:28

A. And may I just refer you to our previous deposition? Because it's on record. 09:28

Q. Then you can say it. So you have the deposition in front of you, look at anything you want, but I'm asking you to identify for the board what your standard consulting rate that 09:29

you are charging in this deposition. 09:29

I don't care what your client is 09:29

paying but I'm just asking what you are being 09:29

paid. 09:29

A. That's the part that I'm under NDA 09:29

not to divulge. However, I can tell you, like I 09:29

did last time, that's in the ballpark of 450 to 09:29

500, in that range. 09:29

Q. Okay. 09:29

And do you know what the markup that 09:29

IMS is charging your ultimate client? 09:29

A. I'm not privy to that. I have no 09:29

idea. 09:29

Q. But in any event, whatever that 09:29

markup is, you're not receiving? 09:29

A. No, I'm not. 09:29

Q. Is there any other things that you 09:29

understand you are obligated to disclose in 09:29

order to qualify as an expert witness in this 09:29

case? 09:29

MS. NGUYEN: Objection, form. 09:29

A. I believe my background, which I had 09:30

previously disclosed in my previous declaration 09:30

in full, and since this declaration is a 09:30

H. Beigi - 11.11.24

continuation, a lot of the information is actually available in my previous declaration, which was Exhibit 1003 listed in this as one of the exhibits. 09:30

Q. And is there any information which has changed since Exhibit 1003 that you are referring to was prepared and submitted to the PTAB? 09:30

A. No. 09:31

Q. So you have no credentials beyond the credentials that were identified in your original declaration marked as Exhibit 1003 in IPR Number 2023-01368 -- 09:31

MS. NGUYEN: Objection, form. 09:31

Q. -- is that correct? 09:31

A. I have since published no papers but incremental things basically. 09:31

Q. And do any of those papers have information that relate to the subject matter of any of the three IPRs? 09:31

A. No, they don't. 09:31

Q. So does it add to your qualifications to be an expert with respect to any of the three IPRs that you published those 09:31

additional papers since you submitted Exhibit 1003 in IPR2023-01368? 09:31

A. I don't believe so. It's just an incremental maintenance of my capabilities. 09:31

I -- I am an active professional -- 09:31

Q. And did you -- 09:32

A. -- so I continue my profession. 09:32

Q. Did you publish anything dealing with chatbots? 09:32

A. No. 09:32

Q. Did you publish anything dealing with natural language processing? 09:32

MS. NGUYEN: Objection, form. 09:32

A. Natural language processing is one of my fields. So because I'm in the field of speech recognition, and natural language processing being part of it, so I have some publications that do relate to natural language processing. 09:32

Q. Since you submitted Exhibit 1001? 09:32

A. Yes. 09:32

Q. Okay. So in addition to requesting copies of the errata sheets that you have submitted for your two prior deposition 09:32

transcripts, we are requesting copies of each of the papers that you have published since Exhibit 1001 was submitted in IPR 10,819,664 that relate to your expertise in natural language processing. 09:32 09:33 09:33 09:33 09:33

MS. NGUYEN: Objection, form. 09:33

Q. Can you identify what those papers are on the record? 09:33 09:33

A. All of them are on archive.org, and searching my name will show my recent papers. 09:33 09:33

Q. So when we take a break, if you can do that on your phone so you can tell us, that would be great. 09:33 09:33 09:33

A. Tell you what? 09:33

MS. NGUYEN: Objection to form. 09:33

A. I'm sorry, tell you what? I'm asking. 09:33 09:33

Q. Tell you the papers that you have published since you submitted Exhibit 1001 in IPR 10 -- I'm sorry, IPR2023-01368 that relate to natural language processing. 09:33 09:33 09:33

A. Yes. 09:33

Q. You understand that natural language processing is a skill set that you've identified 09:33 09:34

H. Beigi - 11.11.24

a person of ordinary skill in the art would need for all three IPRs, correct? 09:34

A. Yes. 09:34

Q. Have you published any papers on natural language interfaces since you submitted Exhibit 1001 in IPR2023-01368? 09:34

MS. NGUYEN: Objection, form. 09:34

A. Natural language interfaces are integral to some natural language processing systems and not directly. 09:34

Q. Can you explain that? 09:34

I don't quite understand what you mean by "integral." 09:34

A. Natural language processing, natural language interface, they both have in common something called "natural language." So they are related. That is all. 09:34

And in that sense, when you talk about one, you may use the other. 09:35

And in that sense, like I said, not directly -- I did not directly publish something on -- specific to natural language interfaces. But it's hard to -- for me to tell you whether there was anything about natural language 09:35

H. Beigi - 11.11.24

interface in there. 09:35

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

MS. NGUYEN: Objection, form. 09:35

A. No. 09:35

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

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

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

MS. NGUYEN: Objection, form. 09:36

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

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

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

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

H. Beigi - 11.11.24

about them. My understanding hasn't changed. 09:37

Q. And what is that understanding? 09:37

I want all the elements that are 09:37

necessary to define what a natural language 09:37

interface is under your understanding. 09:37

MS. NGUYEN: Objection, form. 09:37

A. Can you be more specific, in what 09:38

context? 09:38

Q. When you're writing about natural 09:38

language processing as someone of expert -- as 09:38

an expert in the field, what is your 09:38

understanding of the critical elements to define 09:38

something as a natural language interface? 09:38

MS. NGUYEN: Objection, form. 09:38

A. But you are conflating the two 09:38

things. You are conflating natural language 09:38

processing and natural language interface, and 09:38

you're asking me to tell you what natural 09:38

language interface means with regards to natural 09:38

language processing. 09:38

You are conflating the two. 09:38

Q. Well, you've identified that a 09:38

person of ordinary skill in the art would be 09:38

someone who would have experience using natural 09:38

language processing, correct? 09:38

A. That's correct. 09:38

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

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

MS. NGUYEN: Objection, form. 09:39

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

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

MS. NGUYEN: Objection, form. 09:39

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

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

H. Beigi - 11.11.24

MS. NGUYEN: Objection, form. 09:39

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

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

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

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

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

MS. NGUYEN: Objection, form. 09:41

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

H. Beigi - 11.11.24

that? 09:41

Q. I just did. 09:41

I have a natural language interface as you understand it as someone of extraordinary skill in the art using NLP, and if I type into that interface "I want to buy a book," is there anything that interface needs to be able to do in order to qualify to be a natural language interface? 09:41

MS. NGUYEN: Objection, form. 09:41

A. But you are bringing in NLP again. Like I said, it's just the point where you pass -- so if I say I want to buy a book, the interface has done its job if it passes that information along to the receiving entity. That is the interface. 09:41

It's an interface for passing natural language. 09:42

Q. Well, in the '664 patent, it talks about natural language input and natural language feedback, right? 09:42

In the claims. 09:42

You can look at column 25 around line 18 on. 09:43

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

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

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

You also talked about -- 09:43

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

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

A. Yes. 09:43

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

H. Beigi - 11.11.24

response to the natural language feedback." 09:44

Q. Okay. Do you understand what that using element means? 09:44

A. Yes. 09:44

Q. Okay. And in that using element, it starts by saying, "Using a natural language interface." 09:44

Correct? 09:44

A. Yes. 09:44

Q. Is that the same term that you understand as someone with extraordinary skill in the art of NLPs? 09:44

MS. NGUYEN: Objection, form. 09:44

A. Why NLPs again? 09:44

Q. Because that's how you defined the person of ordinary skill in the art as having a skill set in the area with NLPs, correct? 09:44

A. I understand. Okay. 09:44

Q. So I am trying to understand as someone with the skill set of NLPs, how do you understand the term "natural language interface"? 09:44

A. I understand, yes. 09:44

Yes, natural language interface is 09:44

H. Beigi - 11.11.24

in this way -- in this -- the way it's formed here the same way as I have an understanding of what it is. 09:45

Q. And the way that it is formed here, it refers to receiving an input from a user as part of a natural language conversation between the natural language interface and the user. 09:45

Is that consistent with how you understand as someone with skills in NLP of what a natural language interface is? 09:45

MS. NGUYEN: Objection, form. 09:45

A. No, because it says, "Using a natural language interface, receiving input." 09:45

So receiving input using a natural language interface. Like I said, natural language interface is the medium, it's the barrier, it's the connection point that you're using -- as it says, using a natural language interface, receiving input from a user as part of a natural language conversation between the natural language interface and the user. 09:45 09:46

Q. So does a natural language interface receive input from a user as you understand the term "natural language interface" in the context 09:46 09:46

of your expertise with respect to NLP? 09:46

MS. NGUYEN: Objection, form. 09:46

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

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

MS. NGUYEN: Same objection. 09:46

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

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

MS. NGUYEN: Objection, form. 09:47

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

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

H. Beigi - 11.11.24

interface receives input from the user as part of a natural language conversation between the natural language interface and the user, correct? 09:47

A. In this context, yes. But natural language interface is being used to receive the input from a user as -- as is stated in this claim. 09:47

In this context, natural language interface is being used to be able to receive input from a user as part of a natural language conversation. 09:48

Q. And part of the way it's being used is the interface itself receives that input, correct? 09:48

A. Yes. 09:48

Q. And that input is part of a natural language conversation, correct? 09:48

A. In this context, it is. 09:48

Q. And what is a natural language conversation in this context with respect to a natural language interface? 09:48

MS. NGUYEN: Objection, form. 09:48

A. A natural language conversation in 09:48

this context is the conversation which utilizes the natural language interface for transmitting natural language. 09:48

Q. And it's not just any conversation, it's a natural language conversation? 09:49

A. Yes. 09:49

Q. And how does a natural language conversation differ from a conversation? 09:49

MS. NGUYEN: Objection, form. 09:49

Q. As someone that has the skill set of NLP like you have identified a POSA would have. 09:49

A. A natural language conversation is a conversation that utilizes natural language. 09:49

We have to be careful because sometimes in normal conversation, you may use it with just plain, say, conversation. 09:49

But in this context, natural language conversation specifically says that there is natural language involved in the conversation. 09:49

Q. And how is natural language involved in the conversation -- 09:49

MS. NGUYEN: Objection. 09:50

Q. -- in the context of the natural 09:50

language interface and your understanding as someone with experience in NLP? 09:50

MS. NGUYEN: Same objection. 09:50

A. In the context of this claim and this patent, natural language conversation is the passing back and forth conversation back and forth of natural language through the interface. 09:50

It does involve a user based on this claim, and I would surmise that based on this claim, it involves a machine. 09:50

Q. Okay. 09:50

And how do you surmise that the machine is being involved? 09:50

I'm not asking you how you draw the surmising, I'm asking what's the role of the machine under your assumptions or your understanding? 09:50

MS. NGUYEN: Objection, form. 09:51

Q. Let me rephrase that. 09:51

You said you surmised that the natural language conversation that is involved in claim 1 involves both a user and a machine, correct? 09:51

A. Yes. 09:51

H. Beigi - 11.11.24

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

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

MS. NGUYEN: Objection, form. 09:51

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

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

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

Q. Okay. 09:51

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

A. Yes. 09:51

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

MS. NGUYEN: Objection, form. 09:52

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

H. Beigi - 11.11.24

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

MS. NGUYEN: Objection, form.

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

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

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

A. Yes.

Q. In the context of the '664 patent as you've been applying it in the IPR2023-01368, if claim 1 had not said, "a natural language conversation," on line 16 of column 25, but instead said, "a conversation," would it change at all in your opinion the scope of the claim? 09:53

MS. NGUYEN: Objection, form.

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

H. Beigi - 11.11.24

wouldn't change it much. 09:53

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

MS. NGUYEN: Objection, form. 09:54

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

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

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

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

MS. NGUYEN: Objection, form. 09:54

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

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

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

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

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

H. Beigi - 11.11.24

If I am back in 1975 and I am programming a computer using command lines, and I type a command in to the computer and then the computer responds to that command, assuming we are using BASIC programming language at the time, would that be a natural language conversation? 09:56

MS. NGUYEN: Objection, form. 09:56

A. You -- by "BASIC programming language," are you talking about capital B BASIC? 09:57

Q. Yes. 09:57

A. The language BASIC -- 09:57

Q. Yes. 09:57

A. -- or not a basic -- 09:57

Q. You can pick any programming language you want. I know back then, they were using BASIC because that's what I used to use. 09:57

A. No, I can't pick any programming language because you could have a conversational language, and in '75 -- did you say '75? 09:57

Q. Yes. 09:57

A. In 1975, we are already more than a decade into the establishment of the touring 09:57

H. Beigi - 11.11.24

test, and people were working on creating systems that would be able to converse between a user and a machine in natural language form. 09:57

So even then, just by saying any language -- any programming language, I don't think it would be fair because it wouldn't cover ever possible case, scenario. 09:57 09:58

The capital B BASIC that you were using in the 1970s as a programming language, then that would have been -- it would be another language, it wouldn't be natural language, it would be a programming language which had its own grammar. 09:58

Q. So in your opinion, programming in BASIC language through an interface would be using a natural language interface with a natural language conversation or not? 09:58

MS. NGUYEN: Objection, form. 09:58

A. In capital B BASIC, the language BASIC, not any basic program language, in the programming language called "BASIC," you would be communicating your instructions to the machine using the grammar and the keywords, just like our language has but its own grammar and 09:58 09:59

its own keywords or words, and you would be communicating your information to the computer. 09:59

Q. Okay. But not using natural language? 09:59

A. So when you say, "natural language," we mean human languages. 09:59

Q. That's your -- that's your construction for purposes of the '664 patent with experience in NLP -- 09:59

MS. NGUYEN: Objection, form. 09:59

Q. -- is that correct? 09:59

A. So natural language would be the type of language that we are using in our conversation. Any one of those languages, of course. They're not limited to English but a language that humans use for communication. 09:59

Q. In contrast to a language that is being used for programming like BASIC with a capital B? 09:59

MS. NGUYEN: Objection, form. 09:59

A. So BASIC with a capital B is a programming language, which when we say, "natural language," we mean languages that develop naturally by humans. 10:00

H. Beigi - 11.11.24

Q. In contrast to a programming language like BASIC with a capital B, correct? 10:00

A. Which was created artificially, yes. 10:00

Q. Now, the interface in claim 1 requires not only that there be a natural language conversation between the natural language interface and the user but that there be specific aspects of what's included in the natural language conversation, correct? 10:00

MS. NGUYEN: Objection, form. 10:00

A. Can you give me examples of what you mean by -- 10:01

Q. What is -- the next clause says, "wherein the natural language conversation comprises," and it lists element of the conversation, correct? 10:01

A. It says it "comprises a first natural language input" -- still a natural language -- "from the user, a natural language feedback on the first natural language input from the natural language interface, and a second natural language input from the user in response to the natural feedback." 10:01

So there is natural language going 10:01

in, natural language coming back and natural language going in. 10:01 10:01

Q. And that would be your understanding of what a natural language conversation is, right? 10:01 10:01 10:01

MS. NGUYEN: Objection, form. 10:01

A. That's the type of conversation. 10:01

Q. I want to know is it your understanding of what a natural language conversation that is being used in the context of a natural language interface based upon your understanding as someone with experience in NLP? 10:01 10:01 10:02 10:02 10:02

MS. NGUYEN: Objection, form. 10:02

A. A natural language conversation uses natural language interface to pass natural language back and forth or, you know, in some simple cases in one direction, depending on the context, of course. 10:02 10:02 10:02 10:02 10:02

Q. In the context of the '664 patent, can it only be one direction? 10:02 10:02

A. In the context -- 10:02

MS. NGUYEN: Objection, form. 10:02

A. In the context of a claim, it says, "a first natural language input from the user 10:02

H. Beigi - 11.11.24

and "a natural language feedback on the first natural language input." 10:02 10:02

So right there, we have two, so there is the two natural language excerpts back and forth. 10:02 10:03 10:03

Q. So it isn't enough for the natural language conversation to have merely an input and feedback but it must have a natural language input, the first natural language input, and a natural language feedback, is that correct? 10:03 10:03 10:03 10:03 10:03

MS. NGUYEN: Objection, form. 10:03

A. The conversation in this context is asking for this type of information in the form of natural language being passed back and forth. 10:03 10:03 10:03

Q. Is there any natural language input that receives input from the user as part of the natural language conversation between a natural language interface and a user that you are aware of that would not have a natural language input with a natural language feedback in response to that input? 10:03 10:03 10:03 10:03 10:04 10:04 10:04

MS. NGUYEN: Objection, form. 10:04

A. Can you be more specific? Just a little bit -- narrow it down a little bit so 10:04 10:04

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

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

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

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

MS. NGUYEN: Objection, form. 10:05

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

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

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

H. Beigi - 11.11.24

input from the user and a natural language coming back or vice versa. 10:06 10:06

Conversation in the sense that it would -- by -- because depending on what the context is and what the machine is supposed to do, your conversation may basically be short of the complete conversation because it may end up doing something. 10:06 10:06 10:06 10:06 10:06 10:07 10:07

So there are cases where it could start out as conversation -- think of a parent scolding a child who had just run away and then hide. That's to the conversation, not -- it didn't completely form because something happened after that, some request, which may be natural language, which goes to the natural language interface. 10:07 10:07 10:07 10:07 10:07 10:07 10:07 10:07 10:07

And what is produced, if it's the outcome that is requested by that natural language, that's one possibility that is sort of a shorthand conversation. 10:07 10:07 10:07 10:07

And by conversation -- because now there is feedback. And it still has natural language conversation because one -- at least one side was a natural language. 10:07 10:07 10:08 10:08

H. Beigi - 11.11.24

So in that sense, I can think of examples where you haven't -- you still have to call that natural language conversation because there was natural language involved and it was conversation. 10:08

Q. Is it a conversation if there is no response?

MS. NGUYEN: Objection, form.

A. I didn't say there was no response.

Q. That wasn't my question.

I asked you, is it a conversation if there was no response?

MS. NGUYEN: Same objection.

A. Are you qualifying the response as no response means there is no answer, talking to the wall basically? Is that an example?

Q. Is a monologue a conversation?

A. I don't want to become philosophical, but a monologue is -- could be a conversation because you wouldn't waste your words. You're actually saying it to yourself.

Like I said, I don't want to become philosophical. We want to stick to this context.

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

Q. Okay. 10:09

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

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

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

MS. NGUYEN: Objection, form. 10:09

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

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

That's why I don't want to be so specific -- that's why I am asking for context. When you're saying this is a very blanket -- whether we can have a conversation when there is only one party involved or one -- I, you know, just want to be clear in my response. 10:10

Q. You said it can create a conversation in natural language between two parties. 10:10

But that conversation still has to have each party represented with its statement and response, right? 10:10

MS. NGUYEN: Objection, form. 10:11

A. But the conversation is being produced by the same entity. So it's like the monologue type of -- so it's answering itself. 10:11

So it can produce some language -- natural language and it can then respond to its natural language. 10:11

What is the meaning of life? And it may ask a bunch of questions and respond to them. In that sense, you can have a conversation created by one entity. It is a conversation. 10:11

H. Beigi - 11.11.24

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

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

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

MS. NGUYEN: Objection, form. 10:12

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

passing the medium of natural language speaking back and forth. 10:13

So the conversation is the part that is taking place between the two parties, not the interface. I just -- let's be clear about that. 10:13

Q. That's what I said. 10:13

A. Okay. 10:13

Q. And the conversation that you have generated by the LLM in your example is between two fictional parties, not between the user and the natural language interface, correct? 10:13

A. Yes. That's another kind of conversation. 10:13

You are asking about different conversations -- 10:13

Q. No -- 10:13

A. Yes. 10:13

Q. -- I wasn't. I was asking about whether the front part of the claim implies the second part of the claim. 10:13

So the front part of the claim says that you're using natural language interface, receiving input from a user as part of a natural language conversation between the natural 10:14

H. Beigi - 11.11.24

language interface and the user. 10:14

And I want to know if that implies 10:14

that the natural language conversation will 10:14

include a first natural language input from the 10:14

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

the first natural language input from the 10:14

natural language interface? 10:14

A. That is specifically what it is 10:14

saying, yes, it does. 10:14

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

I'm trying to understand from you 10:14

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

have a natural language interface receiving 10:14

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

language conversation between the first natural 10:14

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

conversation would include the user inputting 10:14

something and the machine responding with 10:14

feedback. 10:14

MS. NGUYEN: Object to form. 10:14

A. Well, the conversation can be 10:14

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

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

starting the conversation. 10:15

H. Beigi - 11.11.24

The machine could be starting the conversation. You're asking for another way. 10:15

And then the user can respond. That's another possibility. 10:15

Q. And if the machine didn't respond back to the user, would it still be a natural language conversation? 10:15

MS. NGUYEN: Objection, form. 10:15

A. If the machine produced natural language -- it requires that natural language be used. As long as the conversation and as long as natural language is being used, it is a natural language conversation. 10:15

Because there is no other carved-out version of this where we can say to have conversation or -- it's a conversation, I could use a natural language, then it's a natural language conversation. 10:15

MS. NGUYEN: Counsel, can we take a break? 10:15

MR. MACEDO: As soon as I am done with this line shortly. 10:16

Q. And when you have a natural language input and a natural language feedback, does that 10:16

H. Beigi - 11.11.24

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

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

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

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

Q. Using the form -- 10:16

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

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

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

MS. NGUYEN: Objection, form. 10:17

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

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

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

MS. NGUYEN: Same objection. 10:17

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

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

MS. NGUYEN: Objection, form. 10:17

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

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

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

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

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

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

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

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

A. Yes. 10:18

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

You wrote your expert report, right? 10:18

A. Yes. 10:18

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

MS. NGUYEN: Objection, form. 10:18

A. Yes. 10:18

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

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

the time during the break taking a break. 10:19
MR. MACEDO: He can do whatever he 10:19
wants but -- 10:19
MS. NGUYEN: He can continue looking 10:19
at it when the break -- when we resume. 10:19
Let's take a break. 10:19
MR. MACEDO: Well, I'm going to take 10:19
the break at your request. I mean, we 10:19
haven't -- we've barely been going an 10:19
hour, but -- 10:19
MS. NGUYEN: We have been going more 10:19
than an hour. 10:19
MR. MACEDO: It's 10:19 -- 10:19
MS. NGUYEN: Right. 10:19
MR. MACEDO: -- and we started -- 10:19
MS. NGUYEN: 9:08. 10:19
MR. MACEDO: Okay. I said barely 10:19
more than an hour. Let's -- 10:19
MS. NGUYEN: You said barely an 10:19
hour. That means less than an hour. 10:19
MR. MACEDO: Counsel, please -- 10:19
MS. NGUYEN: Take a break. 10:19
MR. MACEDO: -- you are wasting our 10:19
time. 10:19

Q. Dr. Beigi, you are welcome to look or not as your heart desires during the break. We're going to reconvene at 10:30, which is 11 minutes from now. 10:19

And I would like everyone to be ready to start then. I would like not to waste time on the break more than that. 10:19

And I'm going to be asking you the same question we just did right now, so feel free to look at anything you want or not as your heart desires. 10:19

Thank you. 10:20

A. Thank you. 10:20

Q. I also remind the witness not to confer with counsel at all during any of the breaks or between today and tomorrow, if we continue beyond today. 10:20

A. I understand. 10:20

Q. Thank you. 10:20

(Recess.) 10:20

BY MR. MACEDO: 10:32

Q. Are you ready, Dr. Beigi? 10:32

A. Yes. 10:32

Q. Can you turn to page 36 of Beigi 10:32

H. Beigi - 11.11.24

Exhibit 27. 10:33

A. What page again? Sorry. 10:33

Q. 36. 10:33

36. No -- 10:33

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

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

Okay. Are you there? 10:33

A. Yes. 10:33

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

Yes or no? 10:33

A. Yes -- 10:33

MS. NGUYEN: Objection, form. 10:33

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

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

Inside the black box. 10:34

MS. NGUYEN: Objection, form. 10:34

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

Q. A dialogue box. 10:34

A. Yes. 10:34

H. Beigi - 11.11.24

Q. And in that dialogue box, there is an English language question with two buttons, correct? 10:34

A. Yes. 10:34

Q. And the two buttons give the choice of "yes" or "no." 10:34

A. Yes. 10:34

Q. And "yes" is an English language word? 10:34

A. Yes. 10:34

Q. And "no" is an English language word? 10:34

A. It is. 10:34

Q. Is that a natural language conversation, that content inside the dialogue box that's within the black box on page 36 of Beigi Exhibit 27? 10:34

MS. NGUYEN: Objection, form. 10:34

A. In this context, it is. Because it is part of the Symons exhibit where -- the top of the window is missing here, but on the top of the window is talking about a chat box, which is why in this context of the chatbot, it is a -- it is an English -- it's a natural language 10:34 10:34 10:34 10:35 10:35

interface. 10:35

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

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

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

A. The word "print"? 10:35

Q. Yes. 10:35

MS. NGUYEN: Objection, form. 10:35

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

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

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

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

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

H. Beigi - 11.11.24

MS. NGUYEN: Objection, form. 10:36

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

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

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

Q. And -- 10:36

A. -- is a function. 10:36

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

MS. NGUYEN: Objection, form. 10:36

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

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

A. No. 10:37

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

H. Beigi - 11.11.24

MS. NGUYEN: Objection, form. 10:37

A. It can be. 10:37

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

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

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

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

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

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

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

H. Beigi - 11.11.24

includes a conversation, that that's a conversation? Is that what you are saying? 10:38

MS. NGUYEN: Objection, form. 10:38

A. I did not use the word "generative." This is not generative. It's where you dictate the language by using human conversation. 10:38

So I dictate instead of typing in the C keywords. I dictate the program. 10:38

Q. Because the conversation you're having is saying the programming language, it doesn't make the programming language conversational. 10:38

A. That's not true because the programming language will be part of the conversation and then it becomes natural language. 10:38

Q. But it's not the -- it's not the interface interacting in the programming language that makes it part of the natural language. It's because if I said, "gibberish," gibberish becomes part of my natural language because I said it. 10:39

That's the context of which you are making those words part of the programming 10:39

language or part of the natural language. 10:39

MS. NGUYEN: Objection, form. 10:39

A. I'm sorry? 10:39

Q. You're not saying that dictating the -- you're saying because you dictate something, whatever you're dictating is part of the natural language. You're not saying that programming in BASIC with the capital B is communicating in natural language. 10:39

MS. NGUYEN: Objection, form. 10:39

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

What I am saying is that you can -- not generatively, but you can program using a combination of natural language and the keywords of a language combined and that will still be natural language. 10:40

I'll give you an example. The court reporter is kindly typing whatever I say. If I give specific instructions on go to the next line and type "if," put a space, open parentheses and then type the following statement, close parentheses, this is natural language interface being used and natural language conversation and there is natural 10:40

H. Beigi - 11.11.24

language processing in this example. 10:40

So just merely the fact that the 10:40

words are used were part of the programming 10:40

language doesn't make it not a natural language. 10:40

Q. So under your understanding of the 10:40

claimed language based upon your training in 10:41

NLP, you understand that I am using a natural 10:41

language interface being the court reporter 10:41

because she is receiving input from a user, 10:41

which would be me asking you questions, as part 10:41

of a natural language conversation because we 10:41

are speaking in English, which has grammar, 10:41

between the natural language interface, the 10:41

court reporter and the user. 10:41

Is that what you are saying? 10:41

MS. NGUYEN: Objection, form. 10:41

A. Using the natural language 10:41

interface, I, the user, am communicating with 10:41

the court reporter through natural language 10:41

because I am using a natural language interface 10:41

and I am producing natural language, and if she 10:41

doesn't hear something correctly, she is going 10:41

to ask me to speak louder or more clearly, and 10:41

that is conversation. 10:41

H. Beigi - 11.11.24

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

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

A. No. 10:42

MS. NGUYEN: Objection, form. 10:42

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

A. No -- 10:42

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

MS. NGUYEN: Objection, form. 10:42

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

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

In this case, we don't need any artificial natural language interface because the court reporter is equipped with the ear and language processing. 10:43

Q. So in 2017, when the Symons demonstration was created, and Word had the email copied into it on Mr. Symons' copy of -- or Mr. Symons -- on Symons -- Symons copy of Word had pasted into it the email signature. 10:43

Did you understand that Word was a natural language interface? 10:43

MS. NGUYEN: Objection, form. 10:43

A. By "Word," you mean -- 10:43

Q. Software program that was called "Word" -- 10:43

A. Microsoft. 10:43

Q. -- Microsoft Word that you saw in the demonstration. 10:43

A. Microsoft Office Word. Microsoft Office Word, and you're asking? 10:44

Q. Well, in that demonstration, there was a version of Word that belonged to Mr. Symons which had the -- in the human language of his email signature pasted into it. 10:44

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

MS. NGUYEN: Objection, form.

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

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

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

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

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

MS. NGUYEN: Objection, form.

H. Beigi - 11.11.24

Counsel, please let the witness answer how he wishes. 10:45

A. I can't tell with the information I'm given. 10:45

Q. Okay. 10:46

You talked about a natural language conversation as having grammar. 10:46

MS. NGUYEN: Objection, form. 10:46

A. I talked about natural language having grammar, not natural language conversation having grammar. 10:46

Q. Well, does a natural language conversation need to have an understanding somehow of grammar in order to qualify as a natural language conversation as someone of skill in the art of NLP reading the '664 patent? 10:46

MS. NGUYEN: Objection, form. 10:46

A. The natural language, which is the constituent part of the conversation, has the grammar, the natural language, and it has the grammar to facilitate the conversation. 10:46

I hope that answers your question to be specific. 10:47

Q. So in order to facilitate the 10:47

conversation, that would include generating the natural language feedback on the first natural language input as required in claim 1 of the '664, correct? 10:47

MS. NGUYEN: Objection, form. 10:47

A. Ask that again. Sorry. 10:47

Q. So in order to facilitate the conversation, that would include generating the natural language feedback on the first natural language input as required in claim 1 of the '664, correct? 10:47

A. What's the question? 10:47

Q. That was the question. 10:47

A. You just gave me the last part. 10:47

MS. NGUYEN: Same objection. 10:47

A. Actually, the full question, If you don't mind? 10:47

Q. That is literally the full question. 10:47

THE WITNESS: Would the court reporter mind reading the whole question to me, please. 10:47

(Record read.) 10:48

A. Yes. 10:48

MR. MACEDO: Can we go off for one 10:48

H. Beigi - 11.11.24

second? 10:48

(Pause.) 10:48

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

Q. So in order to generate the natural language feedback, does whatever is generating the conversation need to have an understanding of grammar? 10:49

MS. NGUYEN: Objection, form. 10:49

A. Understanding of grammar is a -- I think a too wide a requirement. As long as it can produce language or to be able to -- so doing a processing of the language so that it mimics natural language and is understandable to the other side because of feedback, that's the only requirement. 10:49

It doesn't necessarily have to understand the grammar the way we do, but it has to have a way of communicating back so that the user understands and so that it also understands. 10:50

So there is the input and then there is the feedback. So the natural language processing is utilized to make some such 10:50

H. Beigi - 11.11.24

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

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

MS. NGUYEN: Objection, form. 10:51

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

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

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

MS. NGUYEN: Same objection. 10:52

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

language interface, yes, because it is transmitting natural language. 10:52

Q. If you have a conversation where the response is always the same irrespective of what the first input is, is that feedback? 10:52

MS. NGUYEN: Objection, form. 10:52

Q. I'm sorry, is that natural language feedback? 10:52

MS. NGUYEN: Same objection. 10:52

A. What is the response? Is the response in natural language form? 10:52

Q. Okay. Let's say no matter what you type in, it says, I am a chatbot, and all I can do is generate an email signature. And no matter what you type in, if you say, I would like a sandwich or if you say, I would like an email signature or if you say, It's blue, it always gave that response, would that be a natural language conversation? 10:52

MS. NGUYEN: Objection, form. 10:53

A. This is a hypothetical. And not in the context of what I have been reviewing and what I have presented. 10:53

So in that specific example, I still 10:53

can't tell whether that is a natural -- by just giving that information, I can't tell -- that's not enough information for me to know. 10:53

Q. So if you had the hypothetical that I just gave you, that would be insufficient for you to determine whether or not it was a natural language interface. 10:53

MS. NGUYEN: Objection, form. 10:53

A. I said it was an interface because it was transporting natural language. 10:53

I'm sorry, what is -- how did I say that's not an interface? 10:53

You just -- just a moment ago -- 10:53

Q. I'm sorry. 10:54

A. -- said it was an interface. 10:54

Q. When I asked you the question about a chatbot that -- I'm sorry, let's strike that. 10:54

So the example I gave you before was that you had an interface which no matter what you typed always responded the same way, I am a chatbot and all I can do is generate an email signature. 10:54

So it does not matter what the input is. The output or response is always the same, 10:54

H. Beigi - 11.11.24

the feedback, okay? 10:54

Would that be a natural language 10:54

conversation under your understanding with your 10:54

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

patent? 10:54

MS. NGUYEN: Objection, form. 10:54

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

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

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

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

was an interface. 10:54

It keeps changing. So be very 10:54

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

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

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

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

change it to something else. 10:55

Q. Dr. Beigi -- 10:55

A. Yes. 10:55

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

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

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

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

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

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

H. Beigi - 11.11.24

the input is based upon your understanding of -- with your training in NLP in the context of the '664? 10:56

MS. NGUYEN: Objection, form. 10:56

A. As long as there is natural language going in and natural language coming out, it is still a conversation. Not a good one, but still a conversation. 10:56

Q. And is it a natural language conversation with the first natural language input from the user and a natural language feedback on the first natural language input from the natural language interface where the response is -- does not rely upon what the user input? 10:56

MS. NGUYEN: Objection, form. 10:56

A. But you're making an assumption that it doesn't rely upon. 10:57

Q. I am. 10:57

A. It receives it -- yes, but I am saying it receives it and it responds. 10:57

Q. No matter what you put in. It doesn't rely upon it. 10:57

A. And that's what I am trying to tell 10:57

you. 10:57

If we know for a fact that it randomly responds in some natural language form, it's still a conversation. But it's a bad one. 10:57

Q. No. Is it a conversation that has natural language feedback on the first natural language input from the natural language interface where the response is the same irrespective of what the first natural language input is? 10:57

MS. NGUYEN: Objection, form. 10:57

A. So here it says -- if we are going now in this context, it says -- because we are going in the context of '664. You are pointing to claim 1, if I am correct. 10:57

Q. Correct. 10:57

A. And in here, it says, "a natural language feedback on the first natural language input." 10:57

It doesn't say, "based on." It says, "on the first natural language input from the natural language interface." 10:58

So upon receiving, it doesn't say, "based upon." That doesn't -- it doesn't make 10:58

H. Beigi - 11.11.24

any connotation here that the -- it has to make a decision, it has to make something that's -- you know, there is replying specifically to that. 10:58

In this wording, it just says -- I'll read it again, "a natural language feedback on the first natural language input." 10:58

Q. So if the board were to determine that a natural language feedback on the first natural language input from the natural language interface needed to use natural language processing to determine what that feedback would be based upon the information that it got from the first natural language input, would that impact any of your analysis of any of the prior art in the '664 patent, IPR? 10:58 10:59

MS. NGUYEN: Objection, form. 10:59

A. No, I don't think so. 10:59

Q. And under that construction, do you understand that the software that Mr. Zatkovich prepared would include natural language interface that complies with the '664 patent? 10:59

A. Under that -- 10:59

MS. NGUYEN: Objection, form. 10:59

H. Beigi - 11.11.24

A. Under that construction, what Mr. Zatkovich specifically produced, which he called a chatbot, which it's not, because I looked at the code and chatbot requires natural language processing, and it did not do natural language processing. So that's a mischaracterization. 10:59 10:59 10:59 10:59 11:00 11:00

But that code did not do any natural language processing. You are requiring natural language processing based on your statement just now. So because we know he did not, then it does not comply with it. 11:00 11:00 11:00 11:00 11:00

Q. Okay. So you agree that the chatbot conversation, which you don't agree is a chatbot conversation, that Mr. Zatkovich identified in his report as something he programmed is not using natural language processing? 11:00 11:00 11:00 11:00 11:00

A. I agree, it's not using natural language processing. 11:00 11:00

Q. And if the PTAB were to adopt your claim construction, do you think that what Mr. Zatkovich programmed in that exhibit meets claim 1 of the '664 patent? 11:00 11:00 11:00

MS. NGUYEN: Objection, form. 11:00

H. Beigi - 11.11.24

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

Q. And why not? 11:01

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

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

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

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

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

MS. NGUYEN: Objection, form. 11:01

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

H. Beigi - 11.11.24

times speak about a chatbot, and in -- in a chatbot, and they do talk about natural language processing. 11:02

So even reading that portion of it, the way I was just constructing it, that's just one portion of the claim. You have to look at the claims as a whole. You have to look at the claims in light of the specifications. 11:02

And, again, under that construct, with the -- in light of the specifications and the rest of the claims, it does not qualify. 11:02

Q. Okay. Now if you go back to Beigi Exhibit 27, and I want you to look at paragraph 1. 11:02

A. Yes. 11:02

Q. And in the first paragraph in the last sentence, you say, "I described my qualifications in detail in my opening declaration dated August 30, 2023, which I understand is Exhibit 1003 to this proceeding." 11:03

A. That's correct. 11:03

Q. And there is no qualifications that you are offering beyond what was included in Exhibit 1003, correct? 11:03

H. Beigi - 11.11.24

A. That's correct. 11:03

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

Correct? 11:03

A. Yes. 11:03

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

A. I provide a ballpark here. 11:03

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

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

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

A. I just did answer. 11:03

MS. NGUYEN: Object to form. 11:03

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

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

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

A. Yes. 11:04

Q. How much expenses did you incur during your work? 11:04

A. Not much. It's just the travel to here. And that's it. 11:04

Q. Okay. And how much money have you been paid to date in total for your work on these three IPRs and the IPR that was not instituted? 11:04

A. I'm not sure. I don't have the invoices. 11:04

Q. A million dollars? 11:04

A. No. 11:04

Q. Half a million dollars? 11:04

A. No. 11:04

Q. 300,000? 11:04

A. No. No. 11:04

Q. 100,000? 11:04

A. It's less than that. 11:04

Q. 50,000? 11:04

A. I don't know. That -- at that point, I don't know because I have to have the invoices. 11:04

Q. Somewhere between 50,000 and 11:04

H. Beigi - 11.11.24

100,000? 11:04

MS. NGUYEN: Objection to form. 11:04

A. I don't know. I really don't know. 11:04

Q. More than 100,000? 11:04

A. No. 11:04

Q. Okay. So that would make it somewhere less than 100,000 -- 11:04

A. From zero to 100,000. It's not zero, we know, and I cannot tell you anymore. 11:05

Q. Is it more than 10,000 dollars? 11:05

A. Yes. 11:05

Q. Is it more than 20,000 dollars? 11:05

You can give me a range or I'll keep asking you. 11:05

A. I -- when it gets to around 50,000 I cannot tell because I don't know the exact amounts in that range. 11:05

Q. Okay. So somewhere north of 40,000 and less than 100. 11:05

A. Again, I'm not sure, but around, yes, I would say. 11:05

Q. Would you say it's less than 75? 11:05

A. I'll -- yes. 11:05

Q. Would you say it's less than 60? 11:05

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

H. Beigi - 11.11.24

A. I don't know. Because there are -- there are parts of the income where you don't execute, where you're not actually -- they are not active. They are investments. 11:06

So I can't tell you that. I don't know. 11:06

Q. Okay. So you don't know whether or not you made more or less than 500,000 last year? 11:06

A. I don't know. 11:06

Q. Okay. 11:06

How much have you been paid since your last deposition with respect to preparing these three declarations? 11:06

A. Have I already been paid? 11:07

MS. NGUYEN: Objection, form. 11:07

Q. Or billed to be paid. 11:07

A. I don't know. I haven't billed this month yet. 11:07

And I don't remember what I billed -- I have several cases, not just patent cases, but I have several clients that I'm not sure. 11:07

Q. You have several clients that you 11:07

are working on this reply declaration for? 11:07

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

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

A. No. 11:07

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

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

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

MS. NGUYEN: Objection, form. 11:08

Q. I'm sorry? 11:08

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

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

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

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

each page? 11:09

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

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

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

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

MS. NGUYEN: Objection, form. 11:10

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

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

MS. NGUYEN: Objection, form. 11:10

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

three probably. But, again, I cannot tell you an exact number. 11:10 11:10

Q. I didn't ask for an exact number. I'm trying to get a ballpark from you -- 11:10 11:10

A. Then I responded. 11:10

Q. -- which was, I'm trying to understand, was your 20 hours with respect to only Beigi Exhibit 27 or was it with respect to all three? Because you seem to have said both in our conversation just now. 11:10 11:10 11:10 11:10 11:10

A. No, I did not. 11:10

MS. NGUYEN: Objection, form. 11:10

Q. Well, that's what I am trying to understand from you. 11:10 11:10

A. I told you, based on '664, that I said 10 to 20. You picked 20. I did not. 11:10 11:10

Q. I'm just trying to give you the most amount of time possible. 11:10 11:10

A. No, but then you can't tell me that I picked 20 and then you told me -- you're asking -- you're telling me -- please let me finish -- you are telling me that I told that you that I spent 20 hours -- 11:10 11:10 11:11 11:11 11:11

Q. Let's withdraw the question and 11:11

H. Beigi - 11.11.24

start again. 11:11

A. Thank you. 11:11

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

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

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

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

MS. NGUYEN: Objection, form. 11:12

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

H. Beigi - 11.11.24

drilling down with you is because I'm trying to clarify what you are saying. 11:12 11:12

I don't mind that you're giving a range, but I want to know what the range is covering. 11:12 11:12 11:12

So when you're saying somewhere between 30 and 40 hours, is that in total for all three declarations or is that with respect to each of the three declarations? 11:12 11:12 11:12 11:12

A. For all three of them. 11:12

Q. Okay. So there are 76 pages in Exhibit 27, and 95 pages in Exhibit 28, and 63 pages in Exhibit 29. 11:12 11:12 11:12

A. Yes. 11:12

Q. So -- 11:12

A. I take your word for it. I didn't check. But I take your word. 11:12 11:12

Q. You have them in front of you. You are welcome to look. 11:12 11:12

A. It's fine. I trust you on this one. 11:13

Q. Okay. So roughly 250, is that what you would say? 11:13 11:13

You can do the math better than me. 11:13

MS. NGUYEN: Objection, form. 11:13

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

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

A. Okay. 11:13

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

A. Okay. 11:13

Q. -- okay? 11:13

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

You can do the math. 11:13

MS. NGUYEN: Objection, form. 11:13

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

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

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

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

A. Yes. 11:14

Q. By yourself? 11:14

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

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

original words versus counsel's? 11:14

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

Q. Well, only 40 hours. 11:14

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

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

MS. NGUYEN: Objection, form. 11:14

A. I don't -- 11:14

Q. You have written a book. 11:14

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

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

A. Exactly? 11:14

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

A. Or more -- 11:14

Q. Okay. 11:14

A. -- yes. 11:14

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

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

H. Beigi - 11.11.24

So in terms of complexity, we cannot compare the two. 11:15

Q. Okay. So when you're doing your scientific pursuit, it is more complex than the analysis that you have given in these reply declarations, so it takes more time, is that what your testimony is? 11:15

MS. NGUYEN: Objection, form. 11:15

A. My scientific pursuit or writing a technical paper? 11:15

Q. Writing the technical paper with respect to your scientific pursuit. 11:15

A. Writing the technical paper in my field requires, because it has a lot of mathematical algorithms, requires more time. 11:15

Q. So when you're -- what was the last paper you wrote on NLP? 11:15

A. We just talked about it. We didn't get a chance to actually look it up. Like I said, it's on archived.org. 11:15

It would be between the time of our last deposition to today, I -- not to today, maybe to a couple of months ago, but I don't remember the exact date. 11:16

H. Beigi - 11.11.24

Q. Okay. But when you wrote that paper, was it approximately 10 pages, 20 pages, 30 pages? 11:16

I'm not going to hold you to an exact number. I just want to get the sense of it. 11:16

MS. NGUYEN: Objection, form. 11:16

A. I don't remember. I work with my students. My -- this was with a Ph.D. student. And, you know, we go back and forth, and I don't even remember the number of pages at this point. 11:16

The most recent paper we published was not on natural language processing but about 79 pages with another student. 11:16

Q. And how long did you and the other student spend writing that paper? 11:16

A. It's hard for me to tell what the student spent because he is not even in this country -- 11:17

Q. Okay. I'll rephrase it. 11:17

A. -- so I can't tell. 11:17

Q. I'll rephrase it. 11:17

How much time did you spend beyond what the student spent in writing that paper of 11:17

H. Beigi - 11.11.24

around 75 pages? 11:17

A. See, the writing is not the only part, the actual writing. It's the running the experiments, coming up with architectures, these are all the time that it takes. 11:17

Are you including -- please let me ask the question because you are shaking your head. 11:17

Is all of that included in what you're asking or the actual sitting behind the computer and typing? 11:17

Q. No, I want everything that went into figuring out what to say and how to say it and saying it that involved you in the 75-or-so-page paper that you did with your student. How much time did you spend doing that? 11:17

A. It was spread over a year. So I can't tell you how much time it actually took. But it was spread out over a year. 11:17

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

A. Again, I really cannot tell you that. Because I have no idea how much time was spent on it. I didn't -- there, I'm not getting paid for the publication, and I'm not -- I 11:18

definitely have no way of telling. 11:18

I spend a lot of time on a lot of things, and I've no idea how much I spent on that. 11:18

Q. And do you have a sense, sitting here today, whether you spent more time working on that 75-page paper with your student than you did with respect to Beigi Exhibit 27, which is 76 pages? 11:18

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

Q. On the paper? 11:18

A. On the paper. 11:18

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

In paragraph 3, it says, "I have personal knowledge of the facts and opinions set forth in this declaration and believe them to be true." 11:18 11:19 11:19

A. Yes. 11:19

Q. Does that mean that every sentence that you have in this declaration is a reflection of your personal knowledge? 11:19 11:19

A. Yes. 11:19

Q. So in paragraph 7, when you say (as read), I understand that Mr. Zatkovich believes 11:19

H. Beigi - 11.11.24

that the computer program has a special meaning, and propose construing it as a target system which is where the functionality is invoked through a display user interface, is that based upon your personal knowledge? 11:19

A. Yes. 11:19

MS. NGUYEN: Objection, form. 11:19

Q. Then why did you say, "I understand"? 11:19

A. I'm sorry? I said, yes, I understand. I -- yes, it is -- did I say anything wrong? 11:19

You asked me -- 11:19

Q. I'm asking whether it's based on your personal knowledge, that statement. 11:19

MS. NGUYEN: Objection, form. 11:19

A. I don't understand the question. 11:19

What do you mean based on my personal knowledge? 11:19

Q. Usually, in declarations, when people say, "I understand," it's because someone informed them. 11:19

Here, you're saying that you have personal knowledge of every sentence in this 11:20

H. Beigi - 11.11.24

declaration, but yet, you're saying you understanding something. 11:20 11:20

So I'm trying to understand from you, when you say, "I understand," does that still mean that it's your personal knowledge which generated your understanding or did someone else generate that understanding? 11:20 11:20 11:20 11:20 11:20

A. I understand because of Exhibit 2001, which I referred to. That's how I understand that this is what Mr. Zatkovich believes. 11:20 11:20 11:20 11:20

Q. So when you prepared this reply, you actually read Exhibit 2001. 11:20 11:20

A. Yes. This part, yes. 11:20

Q. And when you prepared the reply, you also read the POR, which is cited later in paragraph 7. 11:20 11:20 11:20

MS. NGUYEN: Objection, form. 11:20

Q. Page 3. See it says, "POR, 28"? 11:20

A. I did look it up, but I -- you know, I read the document. So -- and, of course, like I said, I was also informed by the counsel. We went back and forth. 11:21 11:21 11:21

So when I say that this is my 11:21

H. Beigi - 11.11.24

understanding, that I understand -- let me go back to what you were referring to, that I have personal knowledge of the facts and opinions set forth, is that I understand every single thing that is stated here. 11:21

I have personal knowledge of it. I understand everything that is stated here, and I agree to everything that is stated here. 11:21

Q. So did you read POR? 11:22

A. I was provided with a portion of the exam -- of the parts that we used actually for this statement. So I've seen it. 11:22

Q. You have seen the whole document or you've seen a portion of the document? 11:22

A. I've seen parts of the document, and I've seen the whole document. I've seen whole document but I concentrate on parts of the document, which I read. 11:22

Q. In that 40 hours, did you read the whole document? 11:22

A. I did not read the whole document. I looked at the whole document. 11:22

Q. Did you read all of Exhibit 2001? 11:22

A. I went through it quickly, yes. I 11:22

H. Beigi - 11.11.24

did go through the whole thing. 11:22

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

You see him, right? 11:22

A. I believe I know -- 11:22

MS. NGUYEN: Objection, form. 11:22

A. -- Mr. Zatkovich is the person at the end of the table. 11:22 11:23

Q. Yeah. And he was at your prior two days of deposition, right? 11:23 11:23

A. I believe -- if you say so. There were a lot of people there. And it was an extended room, so... 11:23 11:23 11:23

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

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

Q. Okay. And so he has heard and saw everything you said -- 11:23 11:23

A. Okay. 11:23

Q. -- or at least -- and then he also read the transcript, as far as you understand, right? 11:23 11:23 11:23

A. Yes. 11:23

Q. Because you read 2001, and he identified the materials you relied on, right? 11:23 11:23

A. Yes. 11:23

Q. Okay. Did you identify the materials that you reviewed and relied on in Exhibit 27? 11:23

A. Like I said, we went back and forth, and identifying what part is -- 11:23

Q. That's not my question. 11:23

A. Yeah, so with the help of the counsel, I did, yes. 11:23

Q. That is not my question. 11:24

A. I'm asking -- 11:24

Q. In that document, did you make a list that these are the materials that I reviewed and relied on? 11:24

A. I'm sorry -- 11:24

Q. Did you make a list -- 11:24

MS. NGUYEN: Object to form. 11:24

Q. -- in the exhibit, or if anywhere, say, I reviewed Mr. Zatkovich's deposition transcript, and I reviewed Mr. Zatkovich's expert report. 11:24

Did you make a list of the documents that you read and reviewed as part of your analysis resulting in Beigi Exhibit 27? 11:24

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

Q. Okay. Wait -- 11:24

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

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

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

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

A. The 2000 ones? 11:25

Q. Correct. 11:25

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

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

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

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

H. Beigi - 11.11.24

have in the list of exhibits. 11:25

Q. How many declarations of Mr. Zatkovich with respect to IPR2023-01368 did you review? 11:26

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

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

A. The reply declaration that Mr. Zatkovich wrote and his deposition -- the transcript of his deposition. 11:26

Q. Again, I said how many declarations of Mr. Zatkovich with respect to IPR2023-01368 relating to the '664 patent did you review, one, two, three, four? 11:26

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

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

A. I'm not sure. I don't think so. I think it was one. Reply -- I remember a reply declaration. 11:26

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

Q. I would like to show you what was submitted as Exhibit 2014 in IPR2023-001368, Supplemental Declaration of Ivan Zatkovich Pursuant to 37 CFR Section 42.64(b)(2) in 11:27

H. Beigi - 11.11.24

Response to Petitioners Objection to Evidence in Providing Supplemental Evidence for Inter Parte Review of Claims 1 through 9, 12 through 16, 18 through 23, 25 through 26, 28 through 31 and 33 of U.S. Patent Number 10,819,664. 11:27

I believe we are marking it as Beigi Exhibit 30. 11:27

(Exhibit 30, document entitled "Supplemental Declaration of Ivan Zatkovich Pursuant to 37 CFR Section 42.64(b)(2) in Response to Petitioners Objection to Evidence and Providing Supplemental Evidence for Inter Partes Review of Claims 1-9, 12-16, 18-23, 25-26, 28-31, and 33 of U.S. Patent No. 10,819,664," marked for identification, as of this date.) 11:28

Q. Let me know if you recognize Beigi Exhibit 30. 11:28

MS. NGUYEN: Counsel, we just want to object to Exhibit 2014 for having been filed and made publicly available. We discussed this before, but we can also discuss this off the record. 11:28

H. Beigi - 11.11.24

A. I'm not sure if I've seen this in context of the original declaration or not. I don't remember right now. 11:30

It may have been -- because I had been shown copies of the documents, so I'm not sure if I have seen this specifically as part of the original declaration or not. So I'm not quite sure. 11:30

Q. It is not the original declaration -- 11:30

A. I know. 11:30

Q. -- I'll represent to you, and it's dated July 29 if you look at page 17 of 17. 11:30

A. Right. 11:31

Q. So it would be something that you would not have seen before July 29. 11:31

A. Right. No, I'm saying, in the reply -- the reply -- the reply declaration -- the patent owner's reply declaration of Mr. Zatkovich. 11:31

Q. This is after the patent owner's reply declaration of Mr. Zatkovich because it is dated later. 11:31

A. That's what I am saying. I'm saying 11:31

H. Beigi - 11.11.24

I'm not sure if I have seen it in conjunction with that as one document or not. That's what I am trying to tell you. 11:31

Q. Okay. 11:31

A. I can't -- I mean, the content seems to be talking about the same thing, so without sort of reading the whole thing and -- so I'm not quite sure right now whether this was in the document -- for the full document that I had for declaration -- for the reply declaration or not. That's what I am trying to say. 11:31

Q. So your testimony is, you're not sure whether you've actually reviewed Beigi Exhibit 30 before? 11:31

MS. NGUYEN: Objection, form. 11:32

A. Yeah, I'm not quite sure. I can't tell you. 11:32

I do see that the arguments -- I see the arguments, and I remember the arguments, but I'm not sure whether I've seen this in conjunction with the original reply declaration that Mr. Zatkovich gave or not. That's the answer. 11:32

Q. Did you find -- okay. You see on 11:32

pages 2 and 3 of Exhibit 30, there is a list of the patent owner exhibits. 11:32

A. Yes. 11:32

Q. I want you to go down that list and identify whether you have seen each of the exhibits that are listed there before you finalized and prepared Beigi Exhibit 27. 11:32 11:33 11:33

A. Okay. I've seen. 11:33

2001. I've seen 2002, 2003 and 2004, of course. 2005, 2006, 2007, 2008, 2009, 2010. 11:33 11:33 11:34

I'm not sure what the patent numbers refer to. Can you -- oh, this is '732 and '317, yes, of course. '732 and '317, I've seen those. 11:34 11:34 11:34

Q. So you are referring to Exhibits 2012 and 13? 11:34 11:34

A. 12 and 13, yes. 11:34

Q. Right. 2011 is reserved because of the other patents, we use that for the '664 patent. 11:34 11:34 11:34

A. Okay. I have seen that, too. 11:34

This is the supplemental we are looking at right now. 11:34 11:34

Q. Right. 11:34

H. Beigi - 11.11.24

A. So that, I'm not -- like I said, I'm not quite sure that -- whether I've seen this together with 2001 or not. That's what I am trying to say. 11:34

Q. But the substance of it, you recognize. 11:34

A. Substance I recognize just glancing it at it, not reading it through right here. 11:34

Q. And what about 2015? 11:34

I can give you copies of 2015 to 2018, if you want. 11:35

A. Would you? If you don't mind. 11:35

Q. Absolutely. 11:35

A. Yeah, that is just a link, so I'm not sure -- and the number is not there, so I'm not quite sure. 11:35

MR. MACEDO: Okay. So we will mark as Exhibit 2015 -- okay. This is a copy that was taken from IPR2024-00165 IPR. It's the same exhibit, but it's taken from that one. 11:35

Q. And it's marked as Exhibit 2015, and it is URL page from medium.com that was reflecting comments that were submitted with 11:35

H. Beigi - 11.11.24

respect to what you referred to as the Symons article? 11:35 11:36

A. I have seen that. Now that you have described it, I see it. 11:36 11:36

MS. NGUYEN: Objection to form. 11:36

Q. We will go ahead and mark it just so that way, you can look at it before you say that. 11:36 11:36 11:36

MR. MACEDO: And we are marking it as Exhibit 31. 11:36 11:36

MS. NGUYEN: Counsel, you meant IPR2024-00065. 11:36 11:36

(Exhibit 31, screenshot from medium.org, marked for identification, as of this date.) 11:36 11:36

MR. MACEDO: And, Counsel, that is the correct IPR number. 11:36 11:36

I will now mark as Exhibit 32 what was submitted in IPR2024-00065 as Exhibit 2016, which is also from the same Medium article that we were talking about with the comments that were submitted by Sachin Prakash. 11:36 11:36 11:36 11:37 11:37

A. Yeah, I'm not sure -- actually, I 11:37

H. Beigi - 11.11.24

was referring to a different comments. I thought you were talking about the comments on the Symons. I -- 11:37

Q. These are comments on Symons. 11:37

When chatbot meets RPA, Senne Symons, at the top. 11:37

A. Oh, so this is just the comment part that's been copied? 11:37

(Exhibit 32, screenshot from medium.org, marked for identification, as of this date.) 11:37

MS. NGUYEN: And, Counsel, after this, can we take a break? 11:37

MR. MACEDO: When I'm done with the line. 11:37

And we are going to mark as Exhibit 33 what was submitted in IPR2024-00065 as Exhibit 2017, which are comments by Esteban on the same Symons Medium submission. 11:37

(Exhibit 33, screenshot from Medium.org, marked for identification, as of this date.) 11:38

Q. You have now looked at what we 11:38

H. Beigi - 11.11.24

marked as 31, 32 and 33. 11:38

Can you tell me whether you have 11:38

reviewed any of those exhibits before? 11:38

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

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

remember the advertisements. 11:38

But it is the first line -- 11:38

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

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

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

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

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

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

right? 11:39

A. Yes. 11:39

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

that we have been talking about? 11:39

A. Yes. 11:39

Q. And these are comments that were 11:39

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

That is your understanding, correct? 11:39

A. Yes. 11:39

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

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

H. Beigi - 11.11.24

trigger the RPA bot? Thanks. 11:39

A. Yes, I see that. 11:39

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

MS. NGUYEN: Objection, form. 11:39

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

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

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

A. 2018, yes. 11:40

Q. Right. 11:40

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

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

A. I apologize -- 11:40

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

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

A. Yes. 11:40

H. Beigi - 11.11.24

Q. And do you know how the chatbot triggered the RPA bot in the Symons article? 11:40

MS. NGUYEN: Objection, form. 11:40

A. Yes, I do. I speak about it in my declaration. 11:40

Q. Feel free. 11:40

And, again, you are looking at Exhibit 27? 11:41

A. Yes. 11:41

Q. You are welcome to look anywhere you want, but on paragraph 46, you do refer to this exhibit. 11:42

A. Okay. Thank you. 11:42

Q. Dr. Beigi, I want you to take your time, but can you tell us where you're reading? 11:45

A. Yeah. I'm reading paragraphs 49 and 50. That's where I talk about this. 11:45

And just give me some time to read to go back. 11:45

I'm going back a little bit to 48 and 49 -- 11:46

Q. Okay. 11:46

A. -- just for your information. 11:46

So going back to the paragraph that 11:48

H. Beigi - 11.11.24

you were looking at, 46 -- that you pointed out, 46, I was looking where I was actually discussing the fact that when we see that the conversation information, the information that is collected in the conversation at the chatbot level, is passed to the RPA, which is what is described by the combination of Symons and Baetens, is passed to the RPA. The RPA generates the signature. 11:48 11:48 11:48 11:48 11:48 11:49 11:49 11:49 11:49

So the act of passing the information along to the RPA at the time when everything had been approved by the person who is providing the information, by the user, that act is a triggering. You're triggering the RPA by passing the information to the RPA so that it can generate the signature. 11:49 11:49 11:49 11:49 11:49 11:49 11:49 11:49 11:49

We do see that the signature is generated, and that is provided in the video and, of course, in the snapshots. And, hence, the triggering is done by the conversational part -- there's usually a chatbot -- the way it triggers the RPA because we see the effect of it. 11:49 11:49 11:49 11:49 11:50 11:50

In -- with respect to the detail of 11:50

H. Beigi - 11.11.24

how that triggering is happening, that is not a very hard thing because the two are working together. The chatbot is associated with the RPA. 11:50

Because they are associated together, they know how to communicate with each other, and we see that the triggering happens. We see that the RPA received the information it needs in order to create the signature and, hence, that is the mechanism for trigger. 11:50

So in response to I want to know how does the chat bot trigger the RPA bot, I think that's a very superficial question because it's a call. Apparently, it is a call. There is a call to the chat -- to the RPA from the chatbot because they're associated with each other and they know how to communicate. 11:50

And as they say, as both Mr. Symons and Baetens say, they work together to put the chatbot and the RPA together and to have them communicate with each other. 11:51

So that, I really don't think the details of what specific mechanism you use to that do that triggering is important because 11:51

H. Beigi - 11.11.24

it's immaterial. 11:51

The fact is, we know it gets 11:51

triggered, we know information is being passed 11:51

because we see it on the other side as been 11:51

generated by the signature -- in the signature. 11:51

So that whole mechanism really, as 11:51

far as a -- anybody interested in the process 11:51

is -- the rest of it is very -- really detailed 11:51

information, which is immaterial because you can 11:51

implement it many different ways. 11:51

Q. Right. And you don't know which of 11:51

those many different ways it was actually 11:51

implemented? 11:51

A. It's immaterial because the passing 11:51

of the information -- let me continue, please. 11:51

Q. No, no, no. I asked you, you don't 11:52

know which of the many ways it was actually 11:52

implemented. 11:52

That calls for "yes," "no," "I don't 11:52

know," "I don't recall." 11:52

MS. NGUYEN: Counsel, objection to 11:52

form. 11:52

Please let him finish answering the 11:52

question. 11:52

H. Beigi - 11.11.24

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

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

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

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

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

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

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

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

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

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

H. Beigi - 11.11.24

A. Because we see the RPA getting the information from the chatbot and producing the signature. 11:53

Q. Well, how do you know it's a call? 11:53

A. Because it has to trigger the RPA. Otherwise, the RPA doesn't have that information. 11:53

Q. But you could trigger it by a send or you could trigger it because the RPA asked you for it, right? 11:53

A. The RPA can't ask you for it because you're the -- the chatbot is in charge of the conversation. The RPA can't ask -- 11:53

Q. How do you know that? 11:53

A. -- for things that are -- that have -- how can you have an RPA ask for something where it doesn't exist yet? 11:53

Q. You can't have an RPA do a call function in a batch-like manner at 3 o'clock every day and say, Give me all the data from the chatbots that we had today. 11:53

MS. NGUYEN: Objection, form. 11:53

Q. Is that physically impossible and outside the scope of what could have possibly 11:53

H. Beigi - 11.11.24

been done by the RPA that you saw in that video? 11:53

A. That -- that is I think a hypothetical that is not related to what we see because what we see is a video, a realtime video. 11:54

We don't -- the snapshots are just provided -- 11:54

Q. Excuse me, a realtime video? 11:54

A. It's a video. 11:54

Q. It's not realtime video. 11:54

MS. NGUYEN: Objection. 11:54

A. "Realtime" means like an observatory of realtime in realtime. It's a video. 11:54

Q. No, realtime does not mean you can observe it in realtime. 11:54

Realtime -- you don't think that video was edited? 11:54

MS. NGUYEN: Objection, form. 11:54

A. I don't know if it was edited or not. 11:54

Q. Of course you don't. 11:54

MS. NGUYEN: Objection, form. 11:54

A. By "realtime," I mean it is a video that I can watch. And I can see that it's 11:54

H. Beigi - 11.11.24

produced that way. 11:54

When the -- the two parties are 11:54

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

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

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

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

question. 11:55

Sitting here today, you do not know 11:55

how the particulars were done to trigger the 11:55

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

supposition, not based upon your knowledge of 11:55

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

MS. NGUYEN: Objection, form. 11:55

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

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

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

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

provide code. 11:55

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

that it automatically generates the signature 11:55

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

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

RPA generates -- automatically generates 11:56

signature. 11:56

H. Beigi - 11.11.24

So that process is a continuous process. It is described as that. Short of seeing the actual code, which is immaterial, again, because we don't care what function call they use or whether they used any other mechanism that's available in a computer program to be able to communicate the information and to trigger the chatbot. 11:56

We see that it triggers the chatbot because it automatically collects all the information and passes it to the RPA to automatically generate the signature. That is what's important. 11:56

This is two processes, and they're communicating here. So... 11:57

MS. NGUYEN: Can we take a break? 11:57

Q. I want you to focus -- 11:57

MR. MACEDO: He hasn't answered my question yet. He has done a lot of words but none of them direct to mine. 11:57

Q. I don't care whether you think it is material. I want to know, do you know how the information is being passed to trigger the RPA bot in the Symons video? Yes or no? 11:57

H. Beigi - 11.11.24

MS. NGUYEN: Objection, form. 11:57

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

Q. Okay. 11:57

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

Correct? 11:57

Look at paragraph 49. 11:57

A. Yes. 11:57

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

MS. NGUYEN: Objection, form. 11:58

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

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

H. Beigi - 11.11.24

they are both in the field and they understand what the chatbot -- I assume that they understand what a chatbot and an RPA is. 11:58

I am taking it based on the fact that they are basically describing a chatbot RPA combination in that light. 11:58

In that context, I know all I need to know in order to see how the interprocess coming, basically that they are sending information -- we know that they are sending information. I don't know the details of how they are sending the information. 11:58

But we know that they work together. That means that if they working together right there, it tells you that they have come together with some unique way of sending this information from the chatbot to the RPA. 11:59

What that is is whatever technique they used. That technique is how they associated the two together basically. 11:59

Q. And do you know for a fact, sitting here today, based upon reading the Symons evidence of record, that the computer code in Symons gathers the same information in the same 11:59

H. Beigi - 11.11.24

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

Do you know, sitting here today, 11:59
whether the computer code that Mr. Zatkovich 11:59
prepared gathers the different information in a 11:59
different manner than the Symons computer 11:59
program? 11:59

MS. NGUYEN: Objection, form. 11:59

A. I have been privy to Mr. Zatkovich's 11:59
code, and I've seen examples which he has 12:00
produced which are not in Symons which are 12:00
hypotheticals. 12:00

So seeing his code, I have more 12:00
information about his implementation, but 12:00
Symons -- and I repeat -- Symons and Baetens say 12:00
that they have -- they are producing a chatbot 12:00
with an RPA, and based on one of your own 12:00
references, Mr. Zatkovich's references from IBM 12:00
as -- in a definition of a chatbot, it requires 12:00
natural language processing. 12:00

It says specifically on top of the 12:00
page of -- I don't remember the right exhibit 12:00
number, but that's the IBM exhibit, which 12:00
defines a chatbot which is used for other 12:00
purposes, but it does include a definition of a 12:00

H. Beigi - 11.11.24

chatbot.

And there, it requires two items. Both of them have to be present. One is AI, and the other one is natural language processing.

I see that Mr. Zatkovich's code does not include natural language processing. Therefore, it is not a chatbot.

But Mr. Symons and Baetens say we have a chatbot. And I don't see any other -- anything that says the contrary. I don't see anything that negates the fact that they have a chatbot because there is a conversation, and they're doing what a chatbot is supposed to do.

Q. So you do not have any firsthand knowledge of what was actually done by Symons and Baetens, correct?

MS. NGUYEN: Objection, form.

Q. You haven't seen the internals. You haven't seen the code.

A. I have not seen the code.

Q. Okay. And you don't know whether the information was gathered in the same way or a different way than Mr. Zatkovich's example.

A. Based on the definition --

H. Beigi - 11.11.24

MS. NGUYEN: Objection, form. 12:02

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

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

MS. NGUYEN: Objection, form. 12:02

A. A simple chatbot? 12:02

Q. Yeah. 12:02

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

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

A. Can you describe -- 12:02

MS. NGUYEN: Objection, form. 12:02

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

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

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

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

of the beholder. So simple is what -- in what sense? 12:02

Be more -- 12:02

Q. So you have not heard the term "simple chatbot" that is used by a person with experience in NLP? 12:02 12:03 12:03

A. I have heard the two words coming together, "simple chatbot." 12:03 12:03

But I'm saying that -- let me finish. 12:03 12:03

But I'm saying that that is a -- sort of a subjective reference. So like saying somebody is a simple person, simple chatbot, it doesn't necessarily specify a definition -- a scientific definition. That's what I am trying to say. 12:03 12:03 12:03 12:03 12:03 12:03 12:03

Q. So if you were told that there was a simple chatbot which relied on keywords, would you understand that chatbot to be using NLP? 12:03 12:03 12:03

A. Yes. Because it is a chatbot and then it must be using NLP. Using -- because natural language -- "NLP" stands for natural language processing. 12:03 12:03 12:03 12:03

Looking for keywords is the form of 12:03

H. Beigi - 11.11.24

natural language processing. Therefore, yes, I would say that you can have a chatbot that has natural language processing that uses -- looks for a specific keywords. 12:03 12:04 12:04 12:04

MS. NGUYEN: And, Counsel, can we take a break? You are on to the next question -- actually, you are on two questions later. 12:04 12:04 12:04 12:04

MR. MACEDO: No, I'm -- actually, I'm still at the same line. 12:04 12:04

Q. If you look at Exhibit 2008, which is the one that you invoked about IBM, What is a Chatbot -- you don't have a copy in front of you -- you agree that IBM is an appropriate authoritative source to understand what NLP and a chatbot is, correct? 12:04 12:04 12:04 12:04 12:04 12:04

MS. NGUYEN: Objection, form. 12:04

A. Certain publications -- I will still take any publication, even from IBM, on its face value and, of course, IBM is a reputable company. 12:04 12:04 12:04 12:04

Q. And did you have a problem with the one that you invoked, which is Exhibit 2008, IBM, What is a Chatbot? 12:04 12:04

H. Beigi - 11.11.24

MS. NGUYEN: Objection, form. 12:04

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

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

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

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

MS. NGUYEN: Objection, form. 12:05

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

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

(Recess.) 12:05

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

H. Beigi - 11.11.24

U.S. Patent No. 11,258,732," marked for identification, as of this date.)

BY MR. MACEDO:

Q. Welcome back, Dr. Beigi.

A. Thank you.

Q. I didn't ask you this earlier, but there is no reason today why you're not capable of testifying honestly and truthfully, right?

A. No.

Q. And nothing has changed since this morning that would make you not capable of continuing to testify?

A. No.

Q. Okay. During the break, we marked as Exhibit 34 the Supplemental Declaration of Ivan Zatkovich Pursuant to 37 CFR 42.64(b)(2) in Response to Petitioner's Objection to Evidence and to Providing Supplemental Evidence for Inter Parte Review of Claims 1 through 6, 9 through 16 and 18 through 21 of U.S. Patent Number 11,258,732 taken from IPR2023-01379 and marked as Exhibit 2014 in that IPR.

Do you recognize that document?

MS. NGUYEN: Counsel, can I have a

H. Beigi - 11.11.24

copy as well?

MR. MACEDO: Sorry. You have it now?

34 is from 1379 and 35 is from 00065.

MS. NGUYEN: And, also, before we begin, I just want to make part of the record that Walkme's counsel had ex parte communications with the witness.

A. Yes, the same as what I said before, I believe it was part of the whole declaration that I looked at together with the reply declaration as a continuation.

But -- I mean, I looked at the content and I believe the content looks familiar, but specifically, you know, this supplemental as a separate item, I'm sort of -- I'm not sure. But I do recognize the content.

Q. There are three separate IPRs, and for each IPR, you got a package of Mr. Zatkovich's declaration testimony, is that correct?

A. Yes. But I also had a sort of list of -- because there are a lot of exhibits that

H. Beigi - 11.11.24

are combined, I did also get a directory, which had all the exhibits in one directory. 13:17

Q. And that included the original declaration and the supplemental declaration from each IPR? 13:17

A. I believe so, yes. 13:17

Q. Okay. And if you look, we also marked as Exhibit 35 the Supplemental Declaration of Ivan Zatkovich Pursuant to 37 CFR 42.64(b)(2) in Response to Petitioner's Objection to Evidence and Providing Supplemental Evidence for Inter Partes Review of Claims 1 through 20 of U.S. Patent Number 11,558,317 from IPR2024-00065. 13:17 13:18 13:18 13:18 13:18

(Exhibit 35, document entitled "Supplemental Declaration of Ivan Zatkovich Pursuant to 37 CFR Section 42.64(b)(2) in Response to Petitioner's Objection to Evidence and Providing Supplemental Evidence for Inter Partes Review of Claims 1-20 of U.S. Patent No. 11,558,317," marked for identification, as of this date.) 13:13

Q. And do you recognize Exhibit 35? 13:18

H. Beigi - 11.11.24

A. Yes, in the same manner. 13:18

Q. Okay. 13:18

So if we go back -- you want to keep these near you but not -- I'm going to go to Exhibit 28 again, which is your reply declaration from the '732 patent and the IPR2023-1379. 13:18

And I want you to look at page 42, which is page 52 on the bottom, and in particular, paragraph 72. 13:18

And I want to focus your attention on the cite before the last sentence where it says, Exhibit 2014, paragraphs 392 through 402; Exhibit 2005; Exhibit 2015, Exhibit 2016 and Exhibit 2017. 13:19

Do you see that? 13:19

A. Yes, I do. 13:19

Let me read the paragraph for the context. 13:19

Q. You are welcome to. 13:19

A. Yes. 13:20

Q. Is it clear to you that as part of your work in preparing your reply declarations, you looked at each version of Exhibit 2014, the 13:20

H. Beigi - 11.11.24

supplemental declarations of Mr. Zatkovich that we have marked as, I believe, 33, 34 and 35? 13:20 13:20

Sorry, 30, 34 and 35. 13:21

A. Okay. 13:21

(Exhibit 36, document entitled "When Chatbots meet RPA bots," screenshot at 3:58, June 18,2024, marked for identification, as of this date.) 13:22 13:22 13:22

A. So right now, we were looking at specifically '732, right? 13:23 13:23

Q. Right. We previously looked at the '634. 13:23 13:23

A. And they reuse the same numbers, so it's 2014 in this specific case, which is 2014 of the supplemental declaration -- 13:23 13:23 13:23

Q. Right. 13:23

A. -- for this specific patent, '732. 13:23

Q. Correct. They are unique supplemental -- supplemental declarations marked as Exhibit 2014, each IPR. 13:23 13:23 13:23

A. That's correct, yes. That's what I was saying. 13:23 13:23

Q. Yes. 13:23

A. There seems to be a wrong paragraph 13:23

H. Beigi - 11.11.24

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

that there is an error, yes. 13:25

Q. And now your knowledge tells you that that -- it has at least one mistake? 13:25

A. At least one mistake because that's what I see right now, yes. 13:25

Q. Right. Okay. 13:25

But going back to my question, we have looked at the '664 patent IPR declaration, and you cited to the Exhibit 2014 from that one, right? 13:25

A. Yes. 13:25

Q. Exhibit 30. 13:25

And that was something you reviewed in context of preparing the '664, right? 13:25

A. Yes. 13:25

Q. And now we are looking from the 1379 IPR with respect to the '732 patent, and you again identify Exhibit 2014, albeit with the wrong paragraph ranges. 13:25

Is that a document that we have marked as Exhibit 34, is that a document you think you reviewed in preparing your -- 13:26

A. Yes. 13:26

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

at Beigi Exhibit 29, which is your reply declaration from IPR2024-00065 relating to the '317 patent, and on page 25, which is page 33 of the exhibit, at the top of the page, at the carryover paragraph 43, you will see that you again cited Exhibit 2014 presumably from that IPR. 13:26

And I want to know if you can -- 13:26

A. Would you mind saying the page number again? 13:26

Q. Sure. It's page 25, which is page 33 of the exhibit. And it's referring to paragraph 43 in the carryover. 13:27

A. Yes, it seems that there is a mistake there as well referring to paragraphs which are nonexistent in this -- yeah, the paragraph numbers are incorrect. 13:27

Q. So, again, the declaration which you thought was true and correct to the best of your knowledge that we've marked as Exhibit 29 has at least one error on page 25 with respect to paragraph 43, citing your own paragraph numbers? 13:28

A. Yes. 13:28

Q. Okay. And same here, you're not 13:28

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

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

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

MS. NGUYEN: Objection, form. 13:28

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

The typo must be in the editing in the way, you know, it is edited. It is just the content of what it's referring to is what I looked at, and I looked at the exhibit number and I made sure that it's correct, but there is a typo in the paragraphs referenced in the declaration. 13:28 13:29

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

A. Yes. 13:29

Q. Is that your signature? 13:29

A. It is. 13:29

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

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

H. Beigi - 11.11.24

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

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

MS. NGUYEN: Objection, form. 13:30

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

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

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

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

H. Beigi - 11.11.24

best of your knowledge, does that include an obligation on you to actually read every sentence and every cite to make sure that the cites are correct? 13:31

A. Yes. So checking the reference -- these are -- you know, just checking and checking the reference, making sure that the content is there, but mistakes in actual references can be made. It's a -- you know, it's a typographical error. 13:31

The document is still that document. 13:31

Q. But nothing precluded you from being able to tell that it was not paragraphs 392 through 402 that should have been cited? 13:31

MS. NGUYEN: Objection, form. 13:31

A. Nothing precluded me to -- 13:31

Q. Yeah. You had access to the document, right? 13:31

A. Yes. 13:31

Q. And counsel didn't tell you, Don't spend time checking that the cites are right, right? 13:31

A. No. 13:32

MS. NGUYEN: Objection, form. 13:32

H. Beigi - 11.11.24

Q. Okay. 13:32

A. Did not, and I like -- 13:32

Q. And there was no physical reason why you couldn't check to see whether or not the paragraphs that you're citing are, in fact, the correct paragraphs, right? 13:32

A. There is no physical reason, but it's an oversight. It's a mistake. 13:32

Q. I accept that it's a mistake. I'm just trying to make sure that you weren't precluded from avoiding the mistake by doing a more diligent job than you did. 13:32

MS. NGUYEN: Objection, form. 13:32

A. I believe that I did a diligent job to the extent of my knowledge. 13:32

And mistakes happen. There were mistakes, and there have been mistakes in many documents, and including other documents we reviewed before from both sides, including -- you know, so mistakes can happen. And I take that as part of handling large volumes of information. 13:32

Q. And 40 hours was more than enough time for you to draft, review, make sure that 13:33

H. Beigi - 11.11.24

all the information was correct for this 250 pages of declarations that were your three reply declarations, right? 13:33

MS. NGUYEN: Objection, form. 13:33

A. In coming up with the 40 hours, we sort of tried to do a ballpark. 13:33

But I did my due diligence, as far as I'm concerned, to make sure that thing are correct. If they weren't, it's just a mistake. 13:33

It wasn't intentional. Let's put it this way. 13:33

Q. I'm not suggesting anything is intentional or not intentional, I'm just trying to understand whether you had done the work that was necessary for you to put a sworn statement to the PTAB averring things that are true when you have already identified at least two mistakes in two of the declarations that you've identified. 13:33

A. I believe in the form of the content that I have provided to the PTAB and in the truthfulness of it. 13:34

References can be mistaken. There are a lot of references. There are a lot of 13:34

H. Beigi - 11.11.24

places where mistakes can happen, and it doesn't change the content of what I was trying to convey. 13:34

And that I did not make any falsification regarding the content. The content -- it was just a mistake. It was just an oversight. 13:34

Q. Well, I'm going to show you what we've marked as Exhibit 36, which was what was marked as Exhibit 2005. It's is IPR2023-01379, and I'll represent that it is the same exhibit that is in all three IPRs. 13:34

I'm giving it to you. 13:35

Do you recognize Exhibit 2005? 13:35

A. Yes, I do. 13:35

Q. What is Exhibit 2005? 13:35

A. This is from the Symons article -- what we called "Symons article" in our first -- in our first meeting. 13:35

Q. Right. And what is it reflecting? 13:35

A. It is -- the title of the article, "When Chatbots meet RPA bots," written by Senne Symons, I think, maybe Senne Symons, and it was published in RoboRana, and it is talking about 13:35

the technology. 13:35

The text is, of course, there. If you want, I can read it. 13:35

Q. You see that there is three responses? 13:35

A. I see those, yes. 13:36

Q. Do those responses from Exhibit -- Beigi Exhibit 36 correspond with what we have marked as 31, 32 and 33? 13:36

A. The first comment -- you say, "response," but it is a comment, right? 13:36

The first comment is the Exhibit 31, written exhibit. 13:36

The second comment is reflected on page 1 of Exhibit 32. 13:36

And the third comment is reflected in Exhibit 33. 13:36

Q. And do you have any reason to believe that Exhibit 2005 does not accurately reflect the information that was posted at Medium? 13:37

A. No, I don't have a reason. 13:37

MS. NGUYEN: Objection, form. 13:37

Q. Okay. And do you have any reason to 13:37

H. Beigi - 11.11.24

believe that Exhibits 31, 32 and 33 do not accurately reflect the information that was posted in Medium? 13:37

A. I believe that -- 13:37

MS. NGUYEN: Objection, form. 13:37

A. I believe that the -- the way they were, if I remember correctly, because I have to go by my memory from the website, there was the article, and at the end of the article, the response to comments were made. 13:37

The way they are reflected here are side-by-side. 13:37

And by "here," I mean the responses. 13:37

Q. But the content is accurate? 13:37

A. The content seems to be accurate. I am not in front of the website at this time to check it, but yes, I think it is. 13:38

Q. And when you saw the responses or comments on the website below the article, was that before or after you submitted the original declarations in this lawsuit? 13:38

A. It was after the original declaration. 13:38

Q. So it was after your deposition dec, 13:38

H. Beigi - 11.11.24

right? 13:38

A. After my deposition. 13:38

Q. Right. So after your deposition, you went and looked, and you saw that the comments that are reflected in Beigi Exhibit 36, which was submitted to the PTAB as Exhibit 2005 in each of the three IPRs, is actually a fair and accurate representation of what was posted at Medium, right? 13:38

MS. NGUYEN: Objection, form. 13:38

A. I saw those comments on the Medium article at the bottom of the article. Not in this fashion, of course, but at the bottom. 13:38

Q. And putting aside whether you agree or disagree with the comments, the comments do reflect how three individuals responded to the Symons Medium post about when chatbots meet RPA bots, right? 13:38

A. After -- 13:39

MS. NGUYEN: Objection, form. 13:39

A. Quite a bit after the fact, but yes. 13:39

Q. And we talked about one before by Neha Negi which wanted to know how the chatbot triggered the RPA bot, and while you didn't 13:39

think it was material, you recognize that no one really knows how the chatbot triggered the RPA bot in detail, right? 13:39

MS. NGUYEN: Objection, form. 13:39

A. I know the exact code. Detail, I guess, may describe that exact code. But -- but I have an idea of how it generally is done. 13:39

Q. But you don't know for sure that it was actually done the way that your idea thinks that it was generally done, right? 13:39

MS. NGUYEN: Objection, form. 13:39

A. I have an idea of what is needed to know about the process from what they have reflected, and I don't think that any more detail is necessary. 13:40

Q. Did you speak to Mr. Symons since your last deposition? 13:40

A. I did not. 13:40

Q. Did you speak to Mr. Baetens since your last deposition? 13:40

A. I did not. 13:40

Q. Did you speak to anyone that is an author of any of the references that had been submitted to the PTAB since your last 13:40

deposition? 13:40

A. I did not. 13:40

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

A. I have not. 13:40

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

MS. NGUYEN: Objection, form. 13:40

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

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

Do you see that? 13:41

A. Yes. 13:41

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

MS. NGUYEN: Objection, form. 13:41

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

chatbot that they wrote, from what I understand from the article and from the -- what they have said. 13:41

So -- 13:41

Q. I'm sorry, what was the chatbot tool? 13:41

A. The chatbot tool is the chatbot that Mr. Baetens' team had created. 13:41

Q. The Arinti chatbot? 13:41

A. Yeah. 13:41

Q. And the Arinti is related to RoboRana, who wrote the RPA, right? 13:41

A. RoboRana published the IPA, and they're related because they are associated with each other in terms of working together as a team, as Mr. Baetens put it, because he managed the team. 13:42

So they were together -- working together. 13:42

Q. They were also commonly owned. 13:42

A. I didn't know that. 13:42

Q. Well, he said in his dep. 13:42

A. Yeah, but I didn't pay attention to the ownership because that's not -- for me, 13:42

H. Beigi - 11.11.24

that's not important. 13:42

MS. NGUYEN: Objection, form. 13:42

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

A. No. 13:42

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

MS. NGUYEN: Objection, form. 13:42

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

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

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

Q. Or someone affiliated with you? 13:43

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

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

H. Beigi - 11.11.24

ownership is immaterial. It's the management of that library and how do you -- you know, whether it's a separate library or not, just that that separation makes it third-party. It's in the way they communicate. 13:43

Q. And that is based upon ordinary English or because of some special skill you have because of your NLP training? 13:43

MS. NGUYEN: Objection, form. 13:43

A. It's in context of computer science, not just NLP, in computer science. 13:43

Q. So that is a unique definition that you know as someone of skill in the art in computer science, is that what you are saying? 13:44

A. I'm not sure if it's unique to computer science, but I know of it in computer science because, of course, I don't know many other sciences. 13:44

Q. Have you heard of Instagram? 13:44

MS. NGUYEN: Objection, form. 13:44

A. I have heard of Instagram. 13:44

Q. Do you know who owns Instagram? 13:44

A. I think I have forgotten. But most people do, but I don't have an Instagram 13:44

account. 13:44

Q. Okay. I believe the answer is Meta. 13:44

Have you heard of Meta? 13:44

A. I have -- 13:44

MS. NGUYEN: Objection, form. 13:44

A. I have -- I have heard of Meta. 13:44

Q. Okay. Assume that Instagram is, in fact, owned by Meta for purposes of this question. 13:44

Have you heard of Facebook? 13:44

A. I have. 13:44

Q. Is it fair to assume that Facebook is also owned by Meta? 13:44

A. Yes. That I know. 13:44

Q. So assuming that both Instagram and Facebook are owned by Meta, if you put the Facebook Messenger as a chatbot on Instagram, would that be a third-party service for Instagram -- 13:44 13:45 13:45

MS. NGUYEN: Objection -- 13:45

Q. -- under your understanding? 13:45

MS. NGUYEN: -- form. 13:45

A. It depends on the -- on the way it was established, but it can be a third-party -- 13:45

H. Beigi - 11.11.24

yes, it can be third party, and it depends on -- if the same -- you know, if the entity treated as one or not -- treated the two as one unit or as, you know, individuals that communicate with each other, then one can be a third party to the other. 13:45

Q. So if there was two teams from Instagram and from Facebook who worked together because they're both owned by Meta, would the integration of a Facebook Messenger as a chatbot on Instagram be a third-party messaging service in the context of these patents as you understand it? 13:45 13:46

MS. NGUYEN: Objection, form. 13:46

A. That's a hypothetical, but if the way you said it, which is two teams, right there you made a separation. You said, "two teams." 13:46

Once you say two teams work together, and if each of them worked on a different aspect, then any one party can be third party to the other's module, yes. 13:46

Q. And if the board were to disagree with you and say because the two teams are working together, as you describe Arinti and 13:46

H. Beigi - 11.11.24

RoboRana, then the fact that they're commonly owned means that they're not -- that the chatbot used is not a third-party messaging service, how would that impact your analysis of the '317 patent? 13:47

MS. NGUYEN: Objection, form.

A. I think if -- as long as we talk about chatbot and RPA, they will be -- they can be and, in most cases, will be a third party.

But you have to then create a new entity, call it something else, Char-PA, whatever, and you have to then say that this whole thing was one module which was working together.

But if you have a chatbot and you have an RPA, then generally, these are two things that are working together as third parties or they can work together in one association.

Q. So, again, I'm saying that if the board rejects your analysis, what you said, and instead agrees that a third-party messaging service has to be a messaging service not commonly owned by the two entities that are

involved with the common team working on it, how would it impact your analysis with respect to the '317 patent and the Symons and Williams references? 13:48

MS. NGUYEN: Objection, form. 13:48

A. With all due respect to the board, if they feel that ownership -- physical of owning -- owning something is going to make a difference in the -- the way these modules communicate with each other, I think that's two different things we are looking at. 13:48

Ownership is a business thing, to own something. These, the chatbot and the RPA, are a chatbot and an RPA, as we have talked about, and you could pick another RPA or you could pick another chatbot. So you can combine any which way you want. 13:49

And regardless of whether you look at these two as one, there is always the -- there is always reason to want to replace one of them with another like thing. 13:49

So just owning it doesn't change things like this. 13:49

Q. For purposes of the '317 patent and 13:49

H. Beigi - 11.11.24

your analysis of the Symons and Williams references in your opening petition, did you take the view that the Arinti chatbot was a third-party messaging service or not? 13:49 13:49 13:49 13:50

MS. NGUYEN: Objection, form. 13:50

A. Can you point me to what you're -- what you're speaking about? 13:50 13:50

Q. I don't think we have your original declarations in front of you, but they have been previously marked, and I'll be happy to give them to you. 13:50 13:50 13:50 13:50

A. Yes, kind of important. 13:50

Q. I'll withdraw that question and come back to it. 13:50 13:50

In the meantime, I just want to confirm that you looked at each of the Zatkovich declarations that were marked as Exhibit -- I'm sorry, strike that. 13:50 13:50 13:50 13:50

You looked at each of the Zatkovich declarations that were marked as Exhibit 2014, each of the IPRs that we marked as 30, 34 and 35 as part of your process of preparing and submitting the IPR and reply declarations, right? 13:50 13:50 13:50 13:50 13:51 13:51

H. Beigi - 11.11.24

MS. NGUYEN: Objection, form. 13:51

A. I believe I did. 13:51

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

A. Yes. 13:51

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

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

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

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

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

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

Q. And their consistent with your 13:52

H. Beigi - 11.11.24

understanding of what the comments were and when they were posted? 13:52

A. Not when they were posted but when I looked at them. 13:52

Q. No, I meant that it indicates, for example, on 31 that it was posted on September 10, 2018. 13:52

Exhibit 31. 13:52

A. Yes, I'm going on based on the deposition exhibits, of course, because I don't have the website in front of me, but I believe, yes. 13:52

Q. Well, you double-checked the website when you reviewed the exhibits, right? 13:52

A. Yes, I did. I looked for the dates and I looked at it for the -- but what I am seeing here is now the numbers, and I'm saying that I believe they are. 13:53

But I'm saying I don't have the website in front of me right now, but I believe they are the same. 13:53

Q. Okay. You have no reason to believe they are not? 13:53

A. I have no reason to believe they are 13:53

H. Beigi - 11.11.24

not. 13:53

Q. Okay. 13:53

Okay. So now, we were going back to your original declarations, which were previously marked. 13:53

Okay. So I'm going to show you Beigi Exhibit 7, which was previously marked that way, which is the declaration of Dr. Homayoon Beigi from IPR2024-00065 with respect to U.S. Patent Number 11,558,317, and this is what we called your original declaration. 13:53

A. Thank you. 13:53

Q. So the question I had asked you earlier that I withdrew and will restate is for purposes of the '317 patent and your analysis of the Symons and Williams references in your opening position, did you take the view that the Arinti chatbot was a third-party messenger service, yes or no? 13:54

MS. NGUYEN: Objection, form. 13:54

Q. Do you understand the question? 13:54

A. I understand the question. I'm looking at my declaration. 13:54

H. Beigi - 11.11.24

Q. So I will let you know that it is third-party target system that is in this patent. It is the '732 patent that uses the third-party messaging system. 13:57

So let's reformulate the question and make it easier for you. 13:57

A. Okay. 13:57

Q. Do you -- are you saying that with respect to Arinti as the chatbot and RoboRana as the automated process, what are you saying is the third-party web-based target system? 13:57

MS. NGUYEN: Objection, form. 13:58

Q. With respect to Symons. 13:58

In the patent you're looking at, the '317 patent. 13:58

A. Well, the third party is a web-based target. 13:58

Q. Correct. 13:58

A. Did you say -- right. 13:58

MS. NGUYEN: Counsel, since we are talking about the '317 patent, do you have the '317 patent to provide Dr. Beigi? 13:58

MR. MACEDO: Certainly can. Absolutely. 13:58

H. Beigi - 11.11.24

Thomas, you want to pull that? 13:58

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

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

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

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

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

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

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

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

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

A. Would you kindly? 14:02

Q. Absolutely. 14:02

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

H. Beigi - 11.11.24

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

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

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

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

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

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

MS. NGUYEN: Objection, form. 14:04

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

H. Beigi - 11.11.24

system. That's an example. 14:05

And, also, the reason I was asking for Williams is that Williams also talks about, you know, communicating with web-based. 14:05

Q. Right. But I'm not asking you about a web-based target system, I'm asking you about a third-party web-based target system which appears in 1[e]. 14:05

And there is no element of Symons that you identify as being the third-party web-based target system with respect to element 1[e], correct? 14:05

MS. NGUYEN: Objection. 14:05

Q. In -- with respect to the '317 patent in your Beigi Exhibit 7. 14:05

A. I believe that it would have been obvious. And, again, it would have been obvious the fact that you can open a browser, that you can go to a pay -- a third party, just like you would, let's say, to RPA itself. You can open a browser and you can go to a third-party link, and POSITA would have known that that is something that they would be able to do easily. 14:06

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

H. Beigi - 11.11.24

also -- so together, also with Williams, that talks about third-party systems that are used. It just makes sense that you would be able to do that. 14:06

Q. And your total analysis that reflects what you just summarized is merely set forth in paragraph 91 and 92 of your declaration that we have marked as Beigi Exhibit 7, correct? 14:06

MS. NGUYEN: Objection, form. 14:06

A. This is partly saying what I'm saying. 14:07

But I'm saying that, in addition to what is here, which is actually disclosed by Williams, and the same as we just talked about, because the mechanism is there, and because Williams already talks about it, and because Symons already has the capability of opening a browser, and because a POSITA would have wanted to offload an automation process to a third-party system, because of all of these things that we just talked about, it makes it natural for a POSITA to be able to want to do that in order to trigger a third-party web-based target system so that they will be able to do an 14:07 14:07 14:07 14:07 14:07 14:07 14:07 14:07 14:07 14:07 14:07 14:07 14:07 14:08

H. Beigi - 11.11.24

observation that they wouldn't be able to do that's in-house. 14:08

Q. And none of the analysis of the "becauses" that you just said were presented with respect to element 1[e] in your declaration, correct? 14:08

MS. NGUYEN: Objection, form. 14:08

Q. With respect to the Symons and Williams combination. 14:08

A. Why do you say that? 14:08

Q. There is two paragraphs listed -- 14:08

A. Two paragraphs that you just said. 14:08

Q. Right. None of those talk about -- neither paragraph 91 or 92 talks about motivation to combine, does it? 14:08

A. It says that Williams discloses that robots can be configured to interface directly with applications through pre-existing application programming interfaces, and the platforms are equally able to work through systems' graphical interfaces, including web browsers. 14:08

So it does say that, right, including web browsers. 14:08 14:09

H. Beigi - 11.11.24

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

H. Beigi - 11.11.24

A. So if we are back to 1[b], basically, the discussion on 1[b] in here, in paragraph 92, I say (as read), As discussed for elements 1[b], Symons and Williams render obvious performing the automation process on a web target system. 14:10

And if you go back to 1[b], which is page 37 of -- 38 of the exhibit and PDF 37, or print 37, I discuss -- I discuss that basically here. 14:10

So we can go through this. But that's what I am referring to. And, basically, like this is an example that we gave. This is the Symons -- that we talked about. Symons automates the process of creating an email signature for the user. And in response to the user instructions, Symons determines the implementation of the automation process. 14:11

Then I talk about how -- 79, paragraph 79. 14:11

Q. Dr. Beigi -- 14:11

A. -- I talk about that -- 14:11

MS. NGUYEN: Counsel, please let him finish his response. 14:11

H. Beigi - 11.11.24

Q. Dr. Beigi, I'm happy to let you continue, but I just want you to focus on the question I asked, which relates to the combination resulting in a web-based target system, in particular, a third-party web-based target system. 14:11 14:11 14:11 14:12 14:12 14:12

I believe that the only place where you discuss that in 1[b] is paragraph 83, in contrast, ends in multiple requests, which is the paragraphs you were pointing to. 14:12 14:12 14:12 14:12 14:12

So if you just confirm that before you continue, that you're talking about my question, not a different question. 14:12 14:12 14:12

A. I'm not talking about a different question. 14:12 14:12

MS. NGUYEN: Objection, form. 14:12

A. I'm not talking about a different question. I think the rest of it is relevant. I think 79 is relevant. 14:12 14:12 14:12

I think what I talked about in -- and with respect to 1[e], that we just read, that Williams tells us that you can use a web-based target system is relevant. 14:12 14:12 14:12 14:12

And I think that it is relevant 14:12

H. Beigi - 11.11.24

that, in context, that the automation RPA basically can offer a return on investment, and the fact that you would want to, based on what Williams says, for example, do third-party processes. 14:12 14:12 14:13 14:13 14:13

And then to your -- and then if you continue, that basically sets the stage on why you want to combine the two, and that's the combination you're asking, and why you would like to have the third-party web target system used by the combination of Symons and Williams. 14:13 14:13 14:13 14:13 14:13 14:13

Q. So in [b], the only place where you talk about the third-party -- I'm sorry, the only place where you talk about the web-based target system is paragraph 83, correct? 14:13 14:13 14:13 14:13 14:13

Where it starts "Additionally"? So that's in contrast to what was above, right? 14:13 14:13

A. Yes. Specifically what I'm saying is I'm actually talking about the web-based target system here, but if you go to where we were sort of referring back to here, we are referring to the whole element, and I'm talking about why you would be -- a POSITA would have wanted to combine the two and then come to the 14:14 14:14 14:14 14:14 14:14 14:14

H. Beigi - 11.11.24

conclusion that a web-based target system would be something that -- so all of that is important in, for example, the conversation about whether it would save time and effort, all of these things become important. 14:14

Because if that's your objective and you would like to reduce the amount of work that you have to do and have better return, these things become a preamble to why the motivation that you would want to combine and you would like to have a third-party target. 14:14

So that's what I am trying to get at. 14:14

Q. Okay. In paragraph 83, where it says, "Additionally," do you identify any motivation to add a web-based target system as disclosed in Williams to Symons, focusing on paragraph 83? 14:14 14:15 14:15 14:15

MS. NGUYEN: Objection, form. 14:15

A. Now that I've read it, would you please ask the question again? Sorry. 14:15 14:15

Q. In paragraph 83 of what we have marked as Beigi Exhibit 7, your declaration from the 00065 IPR with respect to the '317 patent, 14:15 14:15

do you identify any motivation to combine Williams with Symons to utilize a web-based target system? 14:15

A. In paragraph 83? 14:15

Q. Yes. 14:16

A. Yes, it discloses implementing the automation process on a web-based target system. Williams talks about that. 14:16

And you haven't given me Williams, by the way. 14:16

Q. But I said motivation, focus on motivation, why -- would you explain why someone of ordinary skill in the art at the time of the invention would have been motivated to combine Williams with Symons to obtain a web-based target system in paragraph 83? 14:16

I'm not asking you where else, I'm asking you about 83. 14:16

A. But paragraph 83 is in -- is in context. You're asking me to carve out one thing out of my declaration and say just look at this one paragraph. 14:16

Q. That is exactly what I am asking to you do. 14:16

H. Beigi - 11.11.24

A. Then Williams discloses it, and Symons -- so all of the robots can be configured to interface directly with the application to pre-existing application program interfaces. 14:16

These platforms are equally able to work through systems' graphical interface and including web browser, as Williams says, and Symons wants to -- 14:16 14:17

Q. In paragraph 83, do you see any reason that would be a motivation to combine in contrast to recognizing the disclosure of Williams? 14:17

MS. NGUYEN: Objection to form. 14:17

Please let the witness finish responding. 14:17

A. I am because at the end, I'm saying, "Thus, Symons and Williams render obvious element 1[b]." 14:17

So it brings in Symons. It's not just by Williams, right? 14:17

And in that paragraph, although I started with saying what Williams and -- allows us to do, the whole -- many paragraphs before that are motivating it, motivating the fact that 14:17

H. Beigi - 11.11.24

you do want something which is efficient, you do want the -- you want something that would be done in less amount of time with less amount of investment, and that is motivation enough for a POSITA. 14:17 14:17 14:17 14:18 14:18

When they know they can do it using a web-based target system, which Williams teaches, and they know that Symons already knows how to implement a web-based target system as it teaches, the motivation is plenty to combine because of this -- because of all of the things that they will gain. 14:18 14:18 14:18 14:18 14:18 14:18 14:18 14:18 14:18

Q. So are you -- so are you saying that Symons teaches the web-based target system or are you saying that Symons needs to be modified by Williams to teach the web-based target system in your original declaration? 14:18 14:18 14:18 14:18 14:18 14:18 14:18

MS. NGUYEN: Objection, form. 14:18

A. I say that Symons has the capability, as it says, to use a web-based target system because it does open a browser and Williams says that you can open that web browser and do something on a web-based target system. 14:18 14:18 14:18 14:18 14:18 14:18

Therefore, the combination will 14:19

definitely do it. However, Symons itself also shows that you can open a web-based system -- 14:19

Q. Okay. 14:19

A. -- by opening a web browser. 14:19

Q. So what I want to know is, just going to your declaration -- it's a very simple question -- are you saying that Symons discloses a web-based target system? 14:19

A. I say that Symons discloses opening a web browser and doing activity in it, which could include going to a web-based -- basically, it is a web-based target, so what is a web-based target system? 14:19

It is something that runs in a browser, and Symons already shows that. And Williams says more about other types of complex things that you can do. 14:20

But I think Symons shows it, Williams completes it. 14:20

Q. Okay. So I want you to focus on my question and just answer "yes" or "no." 14:20

Do you identify in the '317 patent with respect to claim 1 some aspect of the Symons disclosure which you think is the 14:20

H. Beigi - 11.11.24

web-based target system? 14:20
MS. NGUYEN: Objection to form. 14:20
For the fourth time, please let the 14:20
witness answer completely. 14:20
A. Which is the web-based? 14:20
Q. According to your read. 14:20
A. So which can be is different from 14:20
which is. 14:20
Q. No, is. 14:20
A. Because Symons can access a web 14:20
browser and can trigger a web browser, hence, it 14:20
can trigger a third-party web-based system. 14:20
And because it knows how to 14:21
communicate -- let's say, with an RPA -- let's 14:21
say the third-party RPA that it uses, then it 14:21
should be able to do exactly the same thing 14:21
within a web browser on a link that is sitting 14:21
somewhere else and running some other automation 14:21
on a web-based target system. 14:21
Q. Do you understand the difference 14:21
between "disclosing" versus "rendering obvious"? 14:21
MS. NGUYEN: Objection, form. 14:21
A. The disclosing and -- 14:21
Q. Versus rendering obvious. 14:21

A. Legally or just in English? 14:21

Q. Yes, legally. For purposes of the analysis that you have done in these entire IPR proceedings, all three of them, do you understand the difference between a reference disclosing the element versus something rendering obvious? 14:21 14:21 14:21 14:22 14:22

A. Yes, I do. 14:22

Q. So if you understand that, I want you to explain to me does Symons without Williams, without anything else, disclose the claimed web-based target system? 14:22 14:22 14:22 14:22

Not something that can, not something that's modified, but the specific claim element of a web-based target system. 14:22 14:22 14:22

MS. NGUYEN: Objection, form. 14:22

A. I don't understand because I'm actually relying on both. Why am I here -- 14:22 14:22

Q. Because I'm asking you -- 14:22

A. -- trying to tell you whether one of them -- because that's why I didn't rely on that. I didn't rely just on Symons, but I'm telling you that because Symons has the capability to run something -- I'm going as far 14:22 14:22 14:22 14:22 14:22

H. Beigi - 11.11.24

as that. But I can't go any further than that, because I'm not relying on it. 14:22 14:22

What I am saying is, it can do it because it is capable of running something on a browser and opening it. That is all I can say. 14:22 14:22 14:23

Q. I'm not asking about can, I'm asking do. Okay? 14:23 14:23

So I want you to focus with me. All I'm trying to distinguish is between whether you're saying this element reads on Symons or you have to modify Symons in view of Williams or something else to find the element. 14:23 14:23 14:23 14:23

So I want to know if you're saying that Symons discloses a web-based target system, and if you are saying it does, what is the web-based target system which you are saying Symons discloses as reflected in the declaration that we have marked as Beigi Exhibit 7. 14:23 14:23 14:23 14:23 14:23

MS. NGUYEN: Objection, form. 14:23

A. I'll use the terminology you used. It doesn't specifically disclose that direct by itself, but it makes obvious that it can be done because it is disclosing all the elements, and Williams definitely discloses the web -- the 14:23 14:23 14:23 14:23 14:23

H. Beigi - 11.11.24

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

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

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

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

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

MS. NGUYEN: Objection, form. 14:24

A. Symons discloses interfacing with a web-based target system which makes it obvious -- by itself makes it obvious that you would be able to run a third-party automation on a web-based target system. 14:24

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

H. Beigi - 11.11.24

with Symons, which is what I rely on, describe the third-party web-based target system. 14:25

Q. So with respect to Symons without Williams, the only paragraphs I see are 75, 76 and 77. 14:25

Is there any other paragraphs where you're discussing what Symons discloses without being modified by Williams with respect to web-based target system? 14:25

MS. NGUYEN: Objection, form. 14:26

A. Paragraph 88. 14:27

Q. 88 is not with respect to element 1[b], but let's look at it. 14:27

88 is with respect to element 1[d], and what in 88 is identifying Symons disclosing a web-based target system? 14:27

A. Symons discloses the fact that the RPA can automatically open a browser and enter the details, and the RPA bot enters the user's name and the rest. 14:27

So -- and additionally, the RPA bot automatically clicks on certain GUI elements and so on. 14:27

But that is -- you know, 88 shows 14:27

that Symons is aware of opening a browser and doing things in the browser. 14:27 14:28

Q. And in 88, you are referring to the Cronos email generator, correct? 14:28 14:28

A. Yes. 14:28

Q. So are you asserting that the Cronos email generator is the web-based target system? 14:28 14:28

Because I don't see that anywhere in -- under 87, 88, 89 or 90. 14:28 14:28

MS. NGUYEN: Objection, form. 14:28

A. No. What I'm saying is that Symons as a whole is aware of automatically opening a browser, triggering it and running something in the browser because Symons is disclosing how to interact with the browser, and, like I said, the motivation is all the motivation that I gave in the previous paragraphs that a POSITA would have been motivated to use this capability to run something which is a third party that didn't have to implement themselves, and Williams adds to that and says, Well, I know how to do that. Williams says that you can actually use it, target -- web-based target system. 14:28 14:28 14:28 14:28 14:28 14:28 14:28 14:28 14:28 14:28 14:29 14:29 14:29 14:29

Q. I don't want to talk about 14:29

H. Beigi - 11.11.24

obviousness with Williams. I'm trying to understand what is the disclosure that you are relying upon in Symons as being a web-based target system. 14:29

Because as I understand what you wrote in paragraphs 87, 88, 89 and 90, you're requiring a combination with Williams in paragraph 90 as discussed in element 1[b] for Symons and William to render obvious implementing the automation process on a web-based target system. 14:29

And I don't see you calling out any specific structure in Symons as the web-based target system. 14:29

And, further, when you go on to the third-party web-based target system, you don't call out anything in Symons. 14:30

So I am trying to understand -- and it's very simple -- are you saying in your original declaration that there is some disclosure in Symons which meets a web-based third-party target system or are you saying Symons needs to be modified as disclosed for whatever reason to teach a web-based third-party 14:30

H. Beigi - 11.11.24

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

MS. NGUYEN: Objection, form. 14:30

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

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

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

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

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

H. Beigi - 11.11.24

a web-based target system, but is there anything that you've identified? 14:31

And I believe in your prior answer, you said that the email generator is not the web-based target system. 14:31

So I want to know what, if anything, in Symons -- not how you're modifying it, but just if there is any specific software or something shown in Symons and nothing else which you think meets web-based target system for purposes of the '317 patent? 14:32

MS. NGUYEN: Objection, form. 14:32

A. Again, because it has the capability of accessing your browser and triggering it and running things on it, it is showing that capability. 14:32

I'm not -- it is disclosing something, and that disclosure is the thing I'm talking about. That disclosure of dealing with a web browser -- which is a web-based target system, by the way, the web browser -- 14:32

Q. Are you reading on the web browser as the web-based target system? Are you saying that Symons discloses a web browser and, 14:32

H. Beigi - 11.11.24

therefore, it has a web-based target system? Is that your read? 14:32

MS. NGUYEN: Objection, form. 14:32

Please let him finish responding. 14:33

MR. MACEDO: Well, he isn't responding is the problem, Counsel. 14:33

MS. NGUYEN: You are interrupting him, so you are not allowing him to get to the response. 14:33

MR. MACEDO: No, no, no. Just a simple -- 14:33

MS. NGUYEN: Yes, you are, you're interrupting. No, it is a simple -- stop interrupting him. 14:33

MR. MACEDO: Listen, counsel, I really think that we are going to take a break now. 14:33

MS. NGUYEN: I agree. I have been asking for a break for 30 minutes. 14:33

MR. MACEDO: Okay. And when we go off the record -- 14:33

MS. NGUYEN: What would you like to do? 14:33

MR. MACEDO: -- I'm going to ask 14:33

that you speak to your witness to get him to actually answer the questions I am asking. 14:33

MS. NGUYEN: I am not allowed -- 14:33

MR. MACEDO: Instead of giving me a half an hour -- 14:33

MS. NGUYEN: -- unlike the last deposition, I am not allowed -- 14:33

MR. MACEDO: So, Counsel -- 14:33

MS. NGUYEN: -- to speak with him about the substance of this proceeding. 14:33

If you're suggesting that's something I do -- 14:33

MR. MACEDO: Counsel, I -- 14:33

MS. NGUYEN: Let's take a break. 14:33

MR. MACEDO: -- am saying that you should not discuss the substance but you should -- 14:33

MS. NGUYEN: You just told me to talk to him -- 14:33

MR. MACEDO: Yes. 14:33

MS. NGUYEN: -- about the substance of his identity. 14:33

MR. MACEDO: And if you don't 14:33

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

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

break the rules? 14:33

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

finish, please? 14:33

I am telling you that it is 14:33

appropriate, and I'm giving you 14:33

permission, to talk to him for the 14:33

purposes of getting him to properly answer 14:33

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

He can answer the question whatever 14:34

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

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

question that I'm asking. 14:34

Because the question that I've been 14:34

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

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

figure out whether or not there is 14:34

something in Symons that he is reading on 14:34

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

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

your questions -- 14:34

(Reporter seeks clarification.) 14:34

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

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

And that is a problem. And if it's too hard to do it with us, then, if necessary, we can call the board and see if maybe the board can help us get the correct answer to this question. 14:34

Because right now, I don't have a definitive answer as to whether he is reading on any particular part of Symons as being the web-based target system. 14:34

And it's a very simple question. He should be able -- it's not obvious to me from his declaration if he is reading on anything. I haven't seen anything that he pointed to in his declaration as being the web-based target system. 14:34

So I'm finding it very problematic that he has been giving these wishy-washy answers where before in his prior deposition he was able to give more direct answers. And he is not doing that now. 14:35

So -- 14:35

THE WITNESS: I apologize, you're talking about me, so I should be able to 14:35

interject.

I'm not being wishy-washy. I apologize, I'm not. And I told you I read off exactly what I read off, which is the RPA bot automatically opens browser and enters details.

That is the way that Symons tells you how you can communicate with something learning inside the browser.

What else do you need from me other than telling you -- you're asking me on what are you talking about, and I'm talking exactly showing you the location, telling you about it, and I'm saying it is that Symons discloses that you can open a browser and enter details, which means you're running something on a browser.

Now -- let me continue, pleas.

Now, whether that browser is running something locally, running remotely, running -- it is a web-based target system because it is a browser, web-based, and it's a target system. That's where you're entering the details.

H. Beigi - 11.11.24

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

BY MR. MACEDO:

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

MS. NGUYEN: Objection, form.

Q. -- or I can't answer.

It's a simple, short answer.

A. Are we talking about Microsoft Office Word?

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

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

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

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

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

H. Beigi - 11.11.24

allowing me to. 14:37

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

MS. NGUYEN: Objection, form. 14:37

A. It's in context. 14:37

MS. NGUYEN: He is answering the question. 14:37

Can we take a break? 14:37

BY MR. MACEDO: 14:37

Q. Dr. Beigi, I want you to understand very simply and clearly, I'm not asking you about context, I'm not asking you about some other part. I'm asking you about one discrete element, if you are reading on that element or not reading on that element. 14:37

I think you're not reading on that element. I tried to choose an obvious one to make is very easy for you to say, No, that isn't the web-based target system because it isn't the web-based target system, and isn't what you read on as the web-based target system. 14:37

I was trying to make the question very simple for you so you could actually answer the question that I'm asking. 14:37

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

MR. MACEDO: Off the record. 14:37

(Recess.) 14:37

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

BY MR. MACEDO: 14:54

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

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

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

A. Yes. 14:56

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

H. Beigi - 11.11.24

MS. NGUYEN: Objection, form. 14:56

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

Q. It's your report. 14:56

A. Right. 14:56

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

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

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

MS. NGUYEN: Objection, form. 14:57

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

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

H. Beigi - 11.11.24

MS. NGUYEN: Objection, form. 14:58

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

Are there any aspects of claim 1 14:58
which you recognize are not disclosed in Symons 14:58
such that you have to rely upon Williams to find 14:58
the missing aspects from claim 1 of the '317 14:58
patent according to your report that we have 14:59
marked as Beigi Exhibit 7? 14:59

MS. NGUYEN: Objection, form. 14:59

A. I think Symons has all of these 14:59
capabilities that are in -- I believe that 14:59
Symons includes all these capabilities that are 14:59
listed in claim 1. 14:59

Q. And to the extent that you believe 14:59
that it has it, you disclosed it in your deck, 14:59
correct? 14:59

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

Q. And so why is this raised as an 15:00
obviousness combination instead of an 15:00
anticipation? 15:00

A. Because I am unsure of certain ways 15:00
that a third-party may interpret my arguments, 15:00
and that's why I am -- I want to make sure 15:00
that -- that the arguments I was -- is 15:00

H. Beigi - 11.11.24

complemented, and in that sense, I'm using an obviousness instead of anticipation. 15:00 15:00

Q. And to the extent that you're relying on an obviousness argument, what aspects of Symons are you proposing a POSITA would be motivated to change in view of Williams in your declaration to make it no longer -- or to make it obvious for claim 1 of the '317 patent. 15:00 15:00 15:00 15:00 15:01 15:01

MS. NGUYEN: Objection, form. 15:01

A. To make it obvious, you said? 15:01

Q. Yes. In other words, you're saying, as I understand it, that Symons discloses all of the elements of claim 1 of the '317 patent, but in the alternative, it would be obvious to a POSITA to modify Symons in view of William to capture some missing elements. 15:01 15:01 15:01 15:01 15:01 15:01

Is that a correct summary of your opinion? 15:01 15:01

MS. NGUYEN: Same objection. 15:01

A. In a way, yes, where what -- what I'm trying to say is that William describes in more detail certain things, which then compliment Symons, and together, then they can render these claims obvious. 15:01 15:01 15:01 15:01 15:01

H. Beigi - 11.11.24

So it is a compliment. In some cases, it describes it in more detail and, you know, that's really the reason that I combine with Williams. 15:02

The components exist in Symons, but there are places where Williams expands on things where it makes it more clear in their usage. 15:02

Q. So in your opinion, nothing needs to be changed in Symons, you just need the additional detail about what Symons actually teaches using Williams, is that your view? 15:02

MS. NGUYEN: Objection, form. 15:02

A. Williams is presenting some supplemental information where I think together, they are stronger -- together, they are a stronger conveyance of what can be done. 15:03

But Symons by itself contains all of that information. 15:03

What I'm trying to say is that Williams basically strengthens. Williams describes certain things that are present in Symons but not possibly well described or a completely described. So that, you know, 15:03

Williams does that and helps in covering those in more detail. 15:03

Q. Okay. So if you look at paragraph 38 of your declaration. 15:03

A. The original declaration? 15:03

Q. Yes, we are looking at Beigi Exhibit 7. 15:03

You see where it says, "To assess obviousness, I understand that I am to consider the scope and content of the prior art, the differences between the priority art and the claim, and the level of ordinary skill in the art and any secondary considerations to the extent they exist." 15:04

A. Yes. 15:04

Q. So what I'm trying to have you explain to me is how you just considered the differences between the prior art and the claim with respect to Symons? 15:04

A. The differences between the prior art and Symons. 15:04

Q. The prior art is Symons, and the claim -- 15:04

A. Right. 15:04

H. Beigi - 11.11.24

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

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

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

MS. NGUYEN: Objection, form. 15:04

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

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

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

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

H. Beigi - 11.11.24

Q. I don't want to stop you, but you don't say, "obvious." You say Symons discloses the preamble, which would suggest that you are saying Symons by itself meets the preamble and you don't need Williams for it. 15:06

That's the type of analysis that I am looking for. 15:06

A. I understand. Okay. Yes. 15:06

Q. Okay. Do you agree with how I characterized that? 15:06

A. I understand. 15:06

So you're -- 15:06

MS. NGUYEN: Objection, form. 15:06

A. You are asking what Symons discloses? 15:06

Q. I'm asking what Symons doesn't disclose. 15:06

A. Doesn't. 15:06

Q. Right. So with the preamble, since Symons discloses it, you can say that Symons discloses the preamble, nothing needs to be changed, next element. 15:06

A. That's what I -- 15:06

Q. That's what I am looking for. 15:06

H. Beigi - 11.11.24

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

I thought that was the question. 15:07

Q. That's the question. 15:07

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

Q. Okay. Thank you. 15:07

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

Q. Right. 15:07

A. Okay. 15:07

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

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

A. Yes. 15:08

Q. Okay. 15:08

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

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

H. Beigi - 11.11.24

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

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

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

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

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

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

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

H. Beigi - 11.11.24

A. Well -- 15:11

Q. That's what -- that is the type of answer I'm looking for. 15:11

MS. NGUYEN: Objection, form. 15:11

A. So Williams talks about a bunch of different things that it does with automation and determining which one to do. That's the point that you can utilize from the Williams in order to -- I'm sorry, in order to make sure that the determining limitation is understood and is there. 15:11

Q. And the issue is that in Symons, it just does one thing, and so if that isn't good enough for the determination, then you're relying on Williams to teach that you can choose among multiple things. 15:11 15:12 15:12 15:12

Is that a correct summary of what your position is? 15:12

MS. NGUYEN: Objection, form. 15:12

A. I believe the one thing, because of the way it's phrased, is also, and, also, because determining is deciding. 15:12

So because "determining" means deciding, regardless, even if it's one thing, 15:12

it's still deciding, still determining. 15:12

But -- so that is not the only 15:12

reason, it's just that the fact of determining, 15:12

you're determining the -- to use the RPA. And 15:12

it is -- it does have that in it. 15:12

So even by itself, the determining 15:12

act, even if it's a single RPA that it 15:12

supports -- which I'm not saying it does, right? 15:12

It can support more because it says 15:12

in its preamble where it says, at this point 15:12

like -- and we don't need to go into that right 15:13

now. 15:13

But -- but -- 15:13

Q. So -- 15:13

A. Let me finish, please. 15:13

Q. Sure. 15:13

A. But the "determining" means 15:13

deciding. So, basically, it -- Symons is also 15:13

determining the RPA to use. 15:13

Q. And if you look at 79, the first 15:13

sentence, you say (as read): A POSITA would 15:13

have been motivated to have a chatbot that 15:13

discerns the user's intent (nature of the call) 15:13

so that the RPA can handle multiple requests. 15:13

Do you see that? 15:13

A. Yes. 15:13

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

A. In case -- 15:13

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

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

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

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

MS. NGUYEN: Objection, form. 15:14

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

backup position for this element at the time you prepared your original declaration? 15:14

MS. NGUYEN: Objection, form. 15:14

A. I think that Williams was actually one of the things that -- one of the references that I found. 15:14

So I can't go back to -- it's over a year ago -- to tell you exactly, but definitely, I am -- you know, this is -- I feel strongly about using it. 15:14

Q. And did you feel that you needed the backup position because it wasn't crystal clear that Symons actually makes the determination? 15:15

A. To me, it is clear. But I understand that you need to be -- in this evaluation, you need to make sure that the other party who is actually listening, you know, receiving this information also agrees with you. 15:15

So in flexibility, I think it makes sense to have Williams as the supporting document -- 15:15

Q. So to -- 15:15

A. -- to combine. 15:15

Q. Is it fair to say that your position 15:15

number 1 is that Symons as is teaches the determining step of 1[b] but your backup position was that it would have been obvious to modify Symons so that the chatbot can discern the user's intent, the nature of the call, so the RPA bot can handle multiple requests. 15:15 15:15 15:15 15:15 15:16 15:16

Is that a fair summary of what you are saying would be the difference that would be obvious? 15:16 15:16 15:16

MS. NGUYEN: Objection, form. 15:16

A. Yes, I think that would be, yes. 15:16

Q. And in paragraph 79 is where you say that? For the alternative position? 15:16 15:16

A. Well, it continues, 79 is where it starts. 15:16 15:16

Q. 79 is where you say what the position is and then the paragraphs that follow support that position? 15:16 15:16 15:16

A. Yes. 15:16

Q. Okay. And do you identify what modifications you would do to Symons in view of your assertion in paragraph 79 as to handling multiple requests? 15:16 15:17 15:17 15:17

A. Well, again, together with the rest, 15:17

H. Beigi - 11.11.24

but in 79, I'm setting the stage with how Williams talks about the importance RPAs and having multiple things being done by the RPAs and its importance to the organization. 15:17

And then I am talking about the fact that given that you want to handle multiple things in the organization using the different RPAs, then I give examples of, for example, the examples that Williams give as some types of automation processes that it looks at. 15:18

Q. So have you identified what modifications you're proposing it would be obvious for a POSITA to do to Symons in view of the assertion of paragraph 79 that would be obvious to modify Symons to handle multiple requests? 15:18

MS. NGUYEN: Objection, form. 15:18

A. In its original form, Symons anticipates being able to do more than one RPA the way it asks the question. 15:18

So in that manner, like I said, I believe that it already knows that that would be something of interest and that's what you would want to do and that is actually anticipating 15:19

H. Beigi - 11.11.24

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

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

MS. NGUYEN: Objection, form. 15:19

Please let him finish answering the question. 15:19

A. I'm focusing on "at this moment" part of that. 15:19

Q. Right. 15:19

A. So what you said was missing that at this moment. At this moment, to the English speaker, would mean that if at this moment I can do this, I'm anticipating I will do other things later. Because otherwise, there is no point in saying "at this moment," I can only do. 15:19 15:20

Q. That's the language you are relying on? 15:20

A. That's the language I'm relying on. 15:20

Q. I'm sorry, please continue. 15:20

A. So based on that language, I believe that Symons already anticipates and knows that 15:20

H. Beigi - 11.11.24

it is a good thing to have multiple automation processes and then what I'm relying on Symons -- I'm sorry, Williams on is that it specifically does declare other types of motivations, processes and does talk about how it is important to be able to do these different types of processes for the business of interest which is, you know, for them to be successful and for the fact that you need to be able to handle multiple automation processes for a business. 15:20

Q. And did Arinti or RoboRana ever implement an automation process to generate electronic letterhead? 15:20 15:21

MS. NGUYEN: Objection, form. 15:21

A. Electronic letterhead? With that phrase? 15:21

Q. You identify in paragraph 81 -- that's the example of one of the other processes -- that it would be obvious base upon the combination? 15:21

A. That's an example. 15:21

Q. Right. 15:21

A. You are saying did they? 15:21

Q. Yeah. 15:21

H. Beigi - 11.11.24

A. So about specifically -- 15:21

Q. Did Symons and Baetens ever modify the chatbot or the Cronos system to generate an electronic letterhead? Because you're saying it would be obvious to a person of ordinary skill in the art to do that and they said at this time. 15:21

So I want to know, did they at some point later modify the system to do what you're saying it would be obvious to do? 15:22

A. I am unaware if they did that or not. 15:22

Q. Did you they modify the system for an automatic generation of an electronic invoice? 15:22

MS. NGUYEN: Objection, form. 15:22

A. I'm unaware of if they have done it. 15:22

Q. Or automated generation of an electronic flyer? 15:22

A. I'm -- let me just cut it short. I'm only aware of this thing that they did but with the anticipation that they will do more and I am unaware of whether they did another one. 15:22

Q. So when they said at this time, that 15:22

H. Beigi - 11.11.24

seems to be the only thing that they ever did that you are aware of, is that correct? 15:22

MS. NGUYEN: Objection. Form. 15:22

A. That I am aware of. That doesn't mean that that may be it because I did not -- this is what I was relying on and I'm not sure where they went afterwards and whether they created another automation. 15:22

Q. But right now, the record is everything that you have seen, and based upon everything that you have seen that has been submitted to the patent office, are you aware of any evidence that Symons and Baetens eventually modified the chatbot or the RPA to do anything other than generate an electronic email address? 15:23

MS. NGUYEN: Objection, form. 15:23

A. Outside of the anticipation that they conveyed, I do not know of it. 15:23

Q. And you were going -- is there anything else that you are saying was a gap that you were trying to fill Williams with with respect to element 1[b]? 15:23

I think there is a paragraph 83 that suggests that you needed Williams to implement 15:23

H. Beigi - 11.11.24

the process on web-based target system? 15:23

MS. NGUYEN: Objection, form. 15:24

A. This is what we discussed in detail before the break and I'm still saying the same thing which I'm saying that Symons knew how to do it and disclosed that you can perform something on a web-based target system and Williams began, did the complementary thing where it supplements that by talking about it. 15:24

Q. And what in Symons is the web-based target system that it was disclosing could do it? Is it the browser? Or is it the email generator that was accessed through the browser? 15:24

MS. NGUYEN: Objection, form. 15:24

Q. Or something else? 15:24

MS. NGUYEN: Same objection. 15:24

A. It was the capability of triggering a browser to interface with it, to interface with the browser filling in, for example, the form, filling in the elements of the automation process for example. 15:24 15:25 15:25 15:25

Q. And from what you saw in the Symons article and video, is it clear to you whether the Cronos email generator software that was 15:25 15:25

H. Beigi - 11.11.24

accessed through the browser was through the internet or whether it resided locally or it could have been either? 15:25

MS. NGUYEN: Objection, form. 15:25

A. I believe it could have been either. It could have been local and it could have been remote. 15:25 15:26

Q. You don't know which one it really was? 15:26

MS. NGUYEN: Objection, form. 15:26

A. I don't think it matters because both are possible. Both -- they -- both are possible. 15:26

MS. NGUYEN: Counsel, if we are talking about Symons, can you please provide the Symons exhibit. 15:26

MR. MACEDO: He has Symons -- I'm happy to give ... 15:26

Q. We are going to give you Exhibits 13 and 14 as previously marked. 15:26

So just to make sure that I understand you correctly. You were saying that, while it doesn't matter to you, you recognize that the Symons disclosure doesn't tell you 15:26 15:27

whether it's residing locally or through the internet, it could be either. Is that a fair summary? 15:27

MS. NGUYEN: Objection. 15:27

Q. This is Beigi Exhibit 13 as originally marked. 15:27

MR. MACEDO: I'll rephrase that question, Counsel. 15:27

MS. NGUYEN: Thank you. 15:27

Q. This is the original Exhibit 14. 15:27

So when I asked you from what you saw in the Symons article and the video is it clear to you whether the Cronos email generator software that was accessed through the browser was through the internet or whether it resided locally or it could have been either, you said I -- I think you meant I believe it could have been either, it could have been local and it could have been remote. 15:28

A. Because it is a web browser and a web browser can run things locally and can run thing remotely. Because it is a web-based target system, it can run a local program and can run external programs, remote programs. 15:28 15:29

H. Beigi - 11.11.24

But the web browser is the -- the web interface is what's important. 15:29

Q. So putting aside what's important and what's not important, what I want to know is your position is that it is not clear whether the web browser is acting -- is accessing the email generator software through the internet or by accessing it locally. It could have been either based upon the disclosure that you see, is that correct? 15:29

MS. NGUYEN: Objection, form. 15:29

A. Based on what we have from Symons, it is filling information on a web-based browser, filling the information that it has collected. And because it is a web-based interface, that could -- the location of where it's running is, of course, the browser itself is running locally, but the location where the automation, the back-end automation possibly or the front end automation, all of that happens is, like I said, unclear. 15:30 15:31

But the browser itself is a browser. That's running locally. So the web-based interface is local. But the target that it is 15:31

H. Beigi - 11.11.24

targeting could be a remote target. 15:31
Is that clear enough? 15:31
Q. I believe you're basically saying 15:31
that it is unclear whether the email generator 15:31
software is running locally or remotely, but the 15:31
browser was on the computer? 15:31
A. That's what I am saying. 15:31
Q. Okay. So is there anything else in 15:31
1[b] which you are looking for as a gap in 15:31
Symons either directly or in the alternative? 15:31
I think you finished 1[b] but I 15:31
don't want to stop you? 15:31
A. I think we did. 15:31
Q. What about in 1[c]? 15:31
A. Symons definitely collects the 15:32
information to be used as part of the automation 15:32
process. It discloses that. 15:32
Q. Okay. 1[d]? 15:32
A. There is a typo here, "must" should 15:33
be "much" on 87 that I just saw actually. 15:33
Q. You want to read the sentence and 15:33
say it correctly? 15:33
A. Correctly it would be, "As Symons 15:33
explains, robotic process automation allows 15:33

H. Beigi - 11.11.24

organizations to execute manual processes much faster, more accurate and reliable." Rather than "must" faster. 15:33

Q. Okay. You have the original exhibit there. If you want to mark it and correct it in pen so we have your -- with your initials. 15:33

And if you can put your initials to show it was you and today's date. 15:34

Q. Thank you. 15:34

So are you saying that element [d] is done solely by Symons or do you need to fill a gap either in the alternative or expressly? 15:34

MS. NGUYEN: Objection, form. 15:34

A. Let me read it. I sort of got caught up by that typo. 15:34

Q. Sure, please, take your time. 15:34

A. So again, depending on whether you agree with my assessment that the fact that it can open up a browser and can implement that process through a web-based interface or not, Symons by itself provides the elements of -- at least the first part of -- let me continue, sorry... 15:36

And using Williams, you know, one of 15:37

H. Beigi - 11.11.24

the things that we can use as a supplement is the fact that Williams also talks about using -- being able to perform with respect to third para -- third-party -- to have web-based target system without relying on API. So that also comes in from Williams, also -- 15:37

Q. Okay, I'm still on -- you're jumping past [d], right? 15:37

A. We did [d] already. 15:37

Q. I'm sorry, I had questions for you for [d]. I want to ask you questions on each element. 15:37

A. Sure. 15:38

Q. Going back to [d], you say in paragraph 87, "For generating an email signature, a graphical user interface, GUI, is displayed to the user. The user interacts with the GUI." 15:38

Well, The user doesn't actually interact with the GUI; the RPA does, right? 15:38

A. No, that's not true. The user also does. 15:38

Q. So to generate an email signature, which GUI are you referring to? It looks like 15:38

H. Beigi - 11.11.24

the pictures that you are showing are pictures of the Cronos system, not the chatbot. 15:38

MS. NGUYEN: Objection, form. 15:38

A. There is the whole GUI which includes, for example, the example you gave before which was the Microsoft Office in copying the information, right? 15:38

Q. That's a different piece of software with a different GUI, right? 15:38

A. No, the GUI is the same GUI. It's -- your graphical user interface is your graphical user interface. This is what -- if you rely on a graphical user interface, it's the collection. It is what is accessible to you and what you can use your mouse and keyboard or whatever other means you have. That is your GUI. 15:39

Q. Just so I understand, when we are talking about the graphical user interface of the web-based target system, you're talking about everything that's on Mr. Symons' screen? 15:39

Because Mr. Symons' screen has a picture of a rock climber, it has a browser using the Cronos software, it has a Windows 15:39

dialogue box, it has the Word document and it has an email has been sent. Are you saying all of that is the GUI? 15:39 15:39 15:39

MS. NGUYEN: Objection. Form. 15:39

A. I'm referring to -- I'm referring to the figure above paragraph 90. Is that what you are looking at? 15:40 15:40 15:40

And this whole thing is a GUI. Because what you are doing is you're copying from the -- in this GUI, you're copying from the results of the RPA into your document. This whole thing is your GUI, that has -- that Symons has access to, has triggered, basically. 15:40 15:40 15:40 15:40 15:40 15:40

Q. And would the Word document that the email signature gets paste into also be part of what you're identifying as the GUI? 15:40 15:40

MS. NGUYEN: Objection. 15:40

Q. Under your read? 15:40

MS. NGUYEN: Objection to form. 15:40

A. Under my read, because this is a interface right now, this is an interface where it's copying -- it's requesting to copy this information on to the Microsoft Office document. 15:40 15:40 15:40 15:40

So as far as that goes, that's 15:41

H. Beigi - 11.11.24

definitely part of the GUI. Because this is what he is relying on in order to be able to pass on the information. Of course this will be emailed to the person as well, but this is one thing that is triggering as well. 15:41

So -- I'm sorry, can I continue? 15:41

And the rest of whether you go into Microsoft Office and that would be considered a GUI at that point, you have to see whether Symons has any specific interactions with the Microsoft Office which relates to what they're doing in the process. 15:41

I'm not really considering that because we don't go that far. We are just talking about up to this moment. But there is definitely interaction of the user with the -- with the system, with the GUI. 15:41

Q. So is it your understanding that Mr. Symons clicked the button that said yes, you can copy? Or is it your understanding that the RPA automatically clicked that button? 15:41

MS. NGUYEN: Objection, form. 15:42

A. I believe that Symons leaves this to what possibility to be open. So you should be 15:42

H. Beigi - 11.11.24

able to do that, and because the RPA basically is an RPA, the RPA should be able to do that as well. 15:42

But you know, if the user does it, which seems like in the example that they're showing the user is doing it, then that's an interaction with the GUI. 15:42

Q. I'm not trying to put words in your mouth. I just want to make sure I understand what you are saying. 15:42

You're saying that it is possible that the RPA clicks a button and it is also possible that Mr. Symons clicked the button. You just don't know which one happened. Putting aside whether it's material or not, that's what you're saying was the actual scenario, am I right? 15:42

MS. NGUYEN: Objection, form. 15:43

A. What I'm saying is that based on the fact that we see the action happening, the action of the mouse moving and clicking, it could be formed either way. 15:43

It could be formed by the RPA or it could be formed by the user and I believe that I 15:43

H. Beigi - 11.11.24

think most likely by the user because it is an interface to send information off to another -- another software let's say. 15:43

So -- yeah. 15:43

Q. And the box which is the Windows modal box that the red arrow is pointing to, is that generated by the Cronos software or is it generated by the local operating system on the computer that is running the RPA? 15:43

A. I believe that was by the operating system. 15:44

Q. So it's a different software program that's generating that box than the Cronos software? 15:44

MS. NGUYEN: Objection, form. 15:44

A. In that regard, the operating system is generating everything. The operating system is the operating system. Everything is you see is by the operating system. Nothing else. 15:44

Q. So the Cronos email generator is being generated by the operating system is your testimony? 15:44

A. The Cronos -- 15:44

Q. Cronos email generator, that's the 15:44

H. Beigi - 11.11.24

software that the user is running, right? 15:44

A. It's being displayed by the 15:44
operating system, it's being presented by the 15:44
operating system. The operating system has a 15:44
role in every single thing you do with the 15:44
computer. 15:44

You're asking -- what you are asking 15:44
me is whether another software generated this 15:44
and I said -- and if it's the operating system, 15:45
everything we see here and anywhere else you see 15:45
on any computer is generated by the operating 15:45
system. 15:45

Q. Is the operating system the 15:45
web-based target system in your read? 15:45

MS. NGUYEN: Objection, form. 15:45

A. The operating system can run either 15:45
locally, where your web-based target system is 15:45
on or it can be virtually on some other system. 15:45

So what you see is definitely your 15:45
GUI. What is available to you to interact with 15:45
is a GUI. That is the graphical user interface 15:45
because the commonality in it is that user 15:45
interface and the graphics. 15:45

Q. But the claim says -- if you look at 15:45

your quote from 1[d], "implementing the automation process by interacting with the graphical user interface, GUI, of the web-based target system." 15:46

So if the GUI is being generated by the operating system instead of by the Cronos email generator, I'm trying to understand if you're asserting that it's the operating system, the Cronos email generator or something else that is the web-based target system? 15:46

A. What I am saying is that based on the request of any entity including the web-based target system which is running on a browser, an operating system can display something. 15:46

So if you go to your browser and in your browser, there is something that runs that requires something to be copied outside to the outside world in the browser, the operating system is used as an interface, as an intermediary to trigger a mechanism like such as a clipboard, which as you see here. 15:47

The clipboard is across all software. It's by the operating system that 15:47

connects all softwares to each other. So I believe this is a clipboard, if I am not mistaken, and basically it is copying it to the clipboard to be then used by some other software. 15:47

Q. And can you identify whether you are asserting any software running on Symons computer is the web-based target system? 15:47

A. The web browser. 15:47

Q. The web browser? 15:47

MS. NGUYEN: Objection, form. 15:47

A. The web browser is the -- is the web-based target system. 15:47

Q. And you're not asserting that the Cronos email generator is the web-based target system? 15:47

MS. NGUYEN: Objection, form. 15:48

A. The Cronos email generator has two parts, two main parts. There is an actual action that it does. Of course yet another part is the communication with the chatbot that we talked about, right, the association between the two. And then there is the actual action that it does. 15:48

H. Beigi - 11.11.24

But then there is the interface with the user which is through the browser in this case. And that is -- so that's why it can't just tell you one thing because it has three important parts. So I can't tell you that it's this or that. But it has different parts. 15:48

Q. So you're not able to answer yes or no as to whether the Cronos email generator is the web-based target system under your read, is that correct? 15:48

MS. NGUYEN: Objection, form. 15:49

A. The Cronos email generator has several parts to it, like I said. Because it is running in a browser as an interface. Then that is one possible web-based target system because you are interacting, it's interacting with you through a web-based interface. 15:49

Any more clarity on that? 15:49

Q. No. I don't understand what you're saying, but if that's going to be the same thing that you're going to keep saying, I will move on. 15:49

A. Okay. 15:49

Q. The next element is 1[e]. And in 15:49

H. Beigi - 11.11.24

1[e], in paragraphs 91 and 92, you do not identify any disclosure from Symons and instead in 92 say Symons and Williams renders obvious. 15:50

So I want to know, are you saying that Symons -- same question we have been discussing for a while. Are you saying that Symons discloses 1[e] or are you saying that you need to fill the gap with Williams? 15:50

MS. NGUYEN: Objection, form. 15:50

A. So we have been talking about specifically the same thing, quite a bit. It's not new, and we have been talking about this quite a bit. 15:50

And like I said, the web-based target system may be a third-party web-based target as Symons discloses, but Williams discloses in more clarity these different examples and completes Symons. 15:51

Q. And the paragraphs you rely on from Williams is quoting paragraph 91? 15:51

A. That's one of the places that Williams talks about. 15:51

Q. And where does the paragraph in 91 identify the web-based target system as being a 15:51

H. Beigi - 11.11.24

third-party web-based target system? 15:51

MS. NGUYEN: Objection, form. 15:51

A. For example, the Citrix terminal 15:51
session, Citrix is a method for you to run 15:51
remotely and, therefore, a third-party target 15:51
system. And web browser. I'm sorry and web 15:51
browser basically. But that's one of the 15:51
example. 15:52

Q. So your understanding is that the 15:52
'317 patent would be met by using a Citrix 15:52
terminal to access a remote station and that 15:52
would be the Citrix terminal is the third-party 15:52
web-based target system for the purposes of the 15:52
'317 patent? 15:52

MS. NGUYEN: Objection, form. 15:52

A. The Citrix terminal session would be 15:52
an example of a third-party system that can be 15:52
run based on what Williams provides, right. So 15:52
that's an example of third-party. 15:52

There are other examples that 15:52
Williams gives. But here, in this example, the 15:52
Citrix terminal session is actually opening 15:52
really an interface with something that's 15:53
running somewhere else. And that indeed makes 15:53

H. Beigi - 11.11.24

it a third-party system. 15:53

Q. So assume for a second that the Arinti chatbot and the RoboRana RPA and all the software that is being run in the Cronos email generator are not considered third-parties for the purposes of this IPR. 15:53

If instead of emailing the data from Mr. Vin Bie's computer to Mr. Symons' computer, they opened a Citrix window, are you saying that would make it the RoboRana email generator software into a third-party target system? 15:53

MS. NGUYEN: Objection, form. 15:54

A. Open and run some automation there. Not just opening it. Because we are talking about in context -- 15:54

Q. Yeah, run the exact same software? 15:54

A. In context. 15:54

Q. Right. 15:54

A. You open the Citrix terminal and run the automation there. That's like a web browser which is web-based target system running something remotely. That's another example. 15:54

These are all examples of where you can run something that would be remote. 15:54

H. Beigi - 11.11.24

Q. But it isn't merely that it's remote. It says a third-party web-based target system, right? It's not enough that you are running a server which isn't a target system. It has to be a target system. Right? 15:54

A. A target system is a system that is in a target. 15:54

MS. NGUYEN: Objection to form. 15:54

Q. And the target system in the context of the '317 patent claim is the target which the RPA -- which the chatbot gathers information to fill in on the target system which is a web-based third-party target system remote somewhere so that way, it executes functionality of that target system, right? 15:54 15:55 15:55 15:55 15:55 15:55

A. Say that again, I don't think I -- 15:55

MS. NGUYEN: Objection to form. 15:55

A. Say that again, I need the order of things. 15:55 15:55

Q. There is a chatbot and an RPA. 15:55

A. Yes. 15:55

Q. And the invention involves gathering information from the chatbot, right? 15:55 15:55

A. Yes. 15:55

H. Beigi - 11.11.24

Q. And then using that information through a displayed user interface or GUI of a computer program or third-party target system -- 15:55

A. Or a web browser. 15:55

Q. It doesn't say web browser. You say web browser. The claims say computer program or a third-party web system -- 15:55

A. A target system. Any target system. Doesn't it say target system? You just said computer program, but it's a target system. 15:55

Q. Computer program in the first two patents, target system in the third. 15:56

A. We are talking about this now. Target system is a target system. Any system that you target. 15:56

Q. Okay. But you are supposed to be executing functionality of the target system as a result of filling in the data, correct, that you have created from the chatbot. Is that consistent with your understanding of the invention? 15:56

MS. NGUYEN: Objection, form. 15:56

Q. For the '317 patent? 15:56

A. You collect information using a 15:56

H. Beigi - 11.11.24

chatbot and then you execute on the target system. 15:56

Q. A third-party web-based target system? 15:56

A. A third-party web-based target system. 15:56

Q. And the whole reason why you are collecting the information is so you can use the information to get the target system's functionality like buying a book or generating an email signature, right? 15:56

MS. NGUYEN: Objection, form. 15:56

A. Not the only reason, but that's one of the reasons, yes. 15:56

Q. And you understand that if you are buying a book on Amazon.com or Widgetco, that would be the target system, right? 15:57

A. What would be the target system? 15:57

Q. Amazon.com or Widgetco, if that's where you are buying a book as an example. 15:57

A. If you are buying a book on Amazon, then the target system may be Amazon or may be an intermediate layer. I can't say specifically that will be a -- 15:57

H. Beigi - 11.11.24

Q. In Allen, you called out Widgetco as the target system, right? 15:57

A. That's one example. 15:57

Q. And that's in contrast to the computer program that you rely on in the other patents which you say is the Plow (ph) system, right? 15:57

A. Plow system. Yes. 15:57

Q. So is the use of a Citrix terminal to do the exact same thing which was being done locally without access to any web-browser or any remote server enough to make the claim infringe? 15:57

MS. NGUYEN: Objection, form. 15:58

A. To make the claim infringe on... 15:58

Q. On a system that you're accessing through Citrix? 15:58

A. I'm not sure if I understand the question. If I did, I would answer. I'm just not sure if I understand the question. 15:58

Q. Which part do you not understand? 15:58

A. State it and I'll tell you because I just don't understand. I don't get it. 15:58

Q. Assume you have a system which did not use Citrix, and as such, there was no 15:58

third-party web-based target system, you are doing everything else. But there is no third-party -- 15:58

A. You are using Citrix as an example of a third-party target system? 15:58

Q. I'm using Citrix as a modification to fill the gap. 15:58

A. As an example of a target system. Third-party target system. 15:59

Q. Under your read. 15:59

A. Okay, go ahead. 15:59

Q. So -- 15:59

A. So the system does not have that third-party target system. 15:59

Q. Right. The system is just doing, you know, assume you have Symons and the email generator and the email generator used its own GUI instead of the browser and did it directly on the computer as an application. So there is no issue that it is not web-based. Okay? 15:59

If that application was accessed, using the Citrix terminal sessions, would the Citrix software be a third-party web-based target system under your read of the '317 15:59

H. Beigi - 11.11.24

patent? 15:59

MS. NGUYEN: Objection, form. 15:59

A. I think you're misunderstanding the use of the Citrix in this context. Citrix is not used to access the system. I'm not sure -- either you are misunderstanding or you are trying to look for something else that I'm not understanding. Either -- there is a miscommunication here. 15:59 16:00 16:00 16:00 16:00 16:00 16:00

You started saying that there is a system, all self sufficient, running on its own, everything is local on the same device, this is your hypothetical example? 16:00 16:00 16:00 16:00

Q. My hypothetical is instead of using the web browser and running the software locally, that they use their own GUI of the third-party generator. They just open up the app without using the browser, they just use their own interface. 16:00 16:00 16:00 16:00 16:00 16:00

So there is no issue that you were relying upon about whether or not the use of the browser makes it a web-based target system. 16:00 16:00

A. Where does the Citrix coming now, with this scenario? That's where I get lost. 16:01 16:01

H. Beigi - 11.11.24

Q. Right. Vin Bie accesses now it through Citrix on the Symons computer. 16:01

A. I'm not relying on that. I'm relying on -- the part that you are saying is local moving out to be run on Citrix. 16:01

Q. It will be out from Vin Bie, right? 16:01

MS. NGUYEN: Objection, form. 16:01

Q. Vin Bie is not seeing this computer, right? 16:01

A. But what you're saying, by using Citrix, what you are saying is that it's just running this application on a terminal remotely whereas that's not what I'm relying on. 16:01

What I am relying on is using something like the web browser or the Citrix terminal which are remote access capabilities to be able to do -- to basically perform the operation. 16:01

So you have -- you still have to have your chatbot. You still have to, you know, get your information and then you execute the stuff on that target system or vice versa also, these two conditions. 16:02

Q. So if Symons was disclosing the 16:02

application running legally through the browser, so it wasn't a third-party web-based target system under the board's ultimate construction -- 16:02

A. On the browser? That bothers me. Because on the browser -- 16:02

Q. I'm assuming they don't accept your browser argument for the purposes of this question. 16:02

A. But the browser is a separate software. The browser is a browser and that browser is part of the GUI that you are using, but you cannot say that -- if they -- they have to basically implement all the capabilities of a browser within their software. Is that what you are asking? 16:02 16:03

Q. Or that they use Citrix instead of the browser to access the application? 16:03

MS. NGUYEN: Objection, form. 16:03

A. I don't -- I'm sorry, I really don't get it. That's -- 16:03

Q. That's fine, we can move on. Do 1[f]. 16:03

MS. NGUYEN: Can we take a break, 16:03

Counsel. 16:03

Q. I think -- I don't want to wear you out, but I don't think there is going to be much with 1[f] and 1[g] and 1[h] but it's up to you, Dr. Beigi, if you can handle just -- 16:03

A. If you don't mind, just a quick one. 16:03

Q. Can we limit it to five minutes? 16:03

A. Yes. 16:03

(Recess) 16:19

Q. So with respect to element AF of the claim 1 of the '317 patent in Beigi Exhibit 7, you start off with, "As Symons confirms in his declaration..." 16:19 16:20 16:20 16:20

Do you see that? 16:20

A. Yes. 16:20

Q. Did you need Mr. Symons to confirm in his declaration in order to show this element was present? 16:20 16:20 16:20

A. Well, the user does not use an API. So -- but the thing is that Symons clarifies that between the automation process and the chatbot system, there isn't a specific API. So without relying on an application exposed by the web-based target system to the chatbot part. 16:20 16:20 16:20 16:20 16:21 16:21

Q. But the only thing that you cite is Symons' declaration as support for Symons disclosing this, right? Because otherwise, you move on to "if for some reason..." 16:21

A. Yes. 16:21

Q. And then [g], you say in paragraph 98, "Symons discloses...," and then in 99, you say, "As discussed for element 1[b], the GUI is a web-based target system." Right? 16:21

A. Yes. 16:22

Q. And that's when you say that it would be obvious to combine Symons and Williams with respect to element 1[g], right? 16:22

A. That's where I say it, yes, in paragraph 99. 16:22

Q. Right, and except for cross-referencing element 1[b], you identify no disclosure from Williams in addition to whatever you said with respect to 1[b], right? 16:22

A. Well, I'm making reference to the image as well. Which is part of -- sorry? 16:22

Q. That's part of Symons, not Williams? 16:22

A. Symons. No. Symons. 16:22

Q. Right. 16:22

A. I thought you were asking what part of Symons I was referring to? 16:22

Q. No, I said except for cross-referencing element 1[b], you identify no disclosure from Williams in addition to whatever you said with respect to 1[b], with respect to this element, correct? 16:22 16:23 16:23 16:23

A. So yeah, Williams comes into the picture in the paragraph 99 if that's what you are asking. 16:23 16:23

Q. Right. Based upon whatever you said in element 1[b]? 16:23 16:23

A. Yeah. 16:23

Q. And then for 1[h], 100, you say, "Symons discloses," and then you rely upon the copying in 101, right? 16:23 16:23

A. The GUI element, yes. 16:23

Q. But you then again cross-reference element 1[b] for the GUI is of a web-based target system and the combination of Symons and Williams? 16:23 16:23

A. Yes. 16:23

Q. Thank you. 16:23

So now I'm going to show you the 16:23

H. Beigi - 11.11.24

three institution decisions that went forward that we marked previously. 16:23

A. Yes. 16:23

Q. So we marked as Beigi Exhibit 15 the paper number 12, dated March 20, 2024, which is the granting of institutional of the interparties review for IPR 2023-01368, Patent Number 10,819,664. 16:23 16:24 16:24 16:24

And then we are going to also give you as Beigi Exhibit 17 which was previously marked paper number 10, entered March 20, 2024, for IPR 2023-01379 relating to Patent Number 11,258,732. 16:24 16:24 16:24 16:24

And then we will show you what we previously marked as Beigi Exhibit 18 which is the decision granting interparty review for IPR 2024-00065 with respect to U.S. Patent Number 11,558,317. 16:24 16:24 16:24 16:25 16:25

Okay? 16:25

A. Yeah. 16:25

Q. Now, you've read all three of these institution decisions that we have marked as Beigi 15, 17 and 18? 16:25 16:25 16:25

A. Previously. I've read it 16:25

previously, yes. 16:25

Q. Before today. 16:25

A. Yes. At the first, before the first deposition. 16:25

Q. Right. 16:25

A. Yes. 16:25

Q. Okay. And when you read them, did you see any mistakes or errors in what the board said with respect to any part of any of these decisions? 16:25

MS. NGUYEN: Objection to form. 16:25

Q. To the best of your knowledge? 16:25

A. I don't remember seeing any errors. 16:25

Q. Did you understand that the board properly understood what the patents-in-suit meant? 16:25

MS. NGUYEN: Objection, form. 16:26

A. I'm not sure if I understand what you mean. What do you mean? 16:26

Q. Well, so, you are looking at Exhibit 15 for a second. 16:26

A. Yes. 16:26

Q. You see that on page 3, there is a description of the of '664 patent, Exhibit 1001. 16:26

It's the C element, not the B element. 16:26

A. Okay. 16:26

Q. Okay? 16:26

And I'm going to walk through it sentence by sentence with you so you understand. 16:26

A. Okay. 16:26

Q. And if you look at the Beigi Exhibit 17, you will see there is a comparable section that is not quite verbatim, but pretty close in its descriptions and the same thing in Beigi 18, you will see a similar one. 16:26

A. Okay. 16:27

Q. So now that you've done your original declaration, you've seen the institution decision, you've seen Mr. Zatkovich's declaration, you've been deposed by me for two days before today, you were -- you saw Mr. Zatkovich deposed, and you've done your reply declaration. 16:27

What I want to do is understand whether you think the board properly summarized the three patents-in-suit in the institution decision and I'm going to go line by line asking 16:27

you specific questions. 16:27

A. Okay. 16:27

Q. Okay. So when you start off, and what I would suggest is that you have all three open next to each other. 16:27

So I'm going to be reading from Beigi Exhibit 15 discussing the '664 patent, but feel free to follow along on all three of them. 16:28

A. Can we do one at a time? 16:28

Q. They all are virtually identical and I'll point out any differences as we go. 16:28

I would like to avoid having to spend two hours doing the same thing three times. 16:28

A. Sure. 16:28

Q. So looking at the institution decision for the '664 patent, Beigi Exhibit 15, the first sentence says the '664 patent is titled "Chat-based Application Interface For Automation," and generally relates to "user interfaces for automation processes that utilize chatbot," and then cites to portions of the patent. Right? 16:28

A. Yes. 16:29

H. Beigi - 11.11.24

Q. Do you think that is a proper summary of what the '664 patent claims generally relate to? 16:29

MS. NGUYEN: Objection, form.

A. You know, the five words that they use, it is a summary -- I think the five words that they use to summarize, that is a -- it summarizes the patent. But it's a short -- it's a really a -- not even a description, right? 16:29

It's a -- I mean, it's -- they only go for a few words. Which part do you want me to look at? The fact that it's a user -- that relates to user interface for automation processes that utilize chatbots, right? That's basically -- is there that's the -- 16:30

That's basically like a rewording of the title -- 16:30

Q. Well, in that -- 16:30

A. -- in that sentence. 16:30

I mean, if you look at it, it's got "interface" which is "user interface." You've got automation, which is automation. You've got utilizing chatbot, which is a chat-based. So basically just a restatement of the title. In 16:30

H. Beigi - 11.11.24

that capacity. I think since it is a restatement of the title, it should be a good -- 16:30

Q. Well, is it a restatement of the title or is it a summary of the gist of the claim? 16:31

MS. NGUYEN: Objection, form. 16:31

A. It's a very, very short summary. That's what I am trying to say. So it could be an alternate title. It's a very short summary. 16:31

Does that -- do I make myself clear what I mean by that? 16:31

Q. So let me rephrase it. 16:31

Do you think the board misunderstood the patent by saying that it generally relates to user interfaces for automation processes that utilize chatbots with respect to the '664 patent of claims? 16:31

A. No. 16:31

Q. Do you notice with respect to the '732 patent, it doesn't offer that same summary? I'm looking at page 3 of Exhibit 17. 16:31

A. Where is the actual description? The first paragraph is just saying it's a continuation. Or we did the second paragraph? 16:31

H. Beigi - 11.11.24

Q. The second paragraph goes -- matches the technical solution which we will continue on to. 16:32

A. What part do you want me to look at? 16:32

Q. What I am saying is that you don't see that it says that the '732 patent generally relates to user interfaces for automation processes that utilize chatbots? You don't have comparable language? 16:32

A. I see it says, it says -- the automation process -- I don't see the actual -- I don't see any description here. Or maybe I'm missing it. 16:32

Q. No, my point is there is no description. 16:32

A. There is no description, just a bunch of continuation. 16:32

Q. It's just giving you the family history. 16:32

A. Yeah. 16:32

Q. And the same thing with the '317 patent when you look at it. 16:32

A. Yes, continuation, yeah. 16:33

Q. Okay. So now all three of them go 16:33

H. Beigi - 11.11.24

on and you can substitute the Patent Number but I'll read the '664 one and it says, "The '664 patent discloses" -- quote -- I'm sorry, discloses a "technical solution ... to use a natural language interface" --

A. I'm sorry, where are you reading this?

Q. I'm continuing after the cite on the same page. The '664.

A. Oh, okay. I'm sorry. I was looking at the next paragraph.

Q. Yeah. So let's do it again.

So I'm looking at Exhibit 15, page 3 and the second sentence under the heading says. "The '664 patent discloses a 'technical solution ... to use a natural language interface to receive input from the user and base thereon select an automation process to be executed,' where 'the automation process may be executed in a manner that manipulates the graphical user interface, GUI, of the target system," in a manner similar in which the user operates, and then it cites to column 8 line 65 to column 9 line 4.

Do you see that? 16:34

A. Yes, I see that. 16:34

MS. NGUYEN: Objection form. 16:34

Q. Do you think that the board properly understood the technical solution that the '664 patent was offering at column 8, line 65 through column 9, line 4? 16:34

A. Sorry, I was commenting -- I do have the '664? Oh, yeah. 16:35

Q. I gave you the '664. 16:35

I am going to give you the original Exhibit 9 which is the '732 patent because I know you'll ask for that next. 16:35

A. Yes, it's basically repeating what is in those elements by just removing some -- removing some words, but basically providing the information that is in that paragraph. 16:36

Q. Is the information from column 8 a proper explanation of the technical solution being offered in the '664 patent? 16:36

A. Being one of the specifications, then it is in the '664 patent and it is properly providing because we are actually verbatim talking about it. 16:37

H. Beigi - 11.11.24

Q. Do you think that the language that we are looking at from the '664 patent is related to the technical solution claim in claim 1 of the '664 patent? 16:37

MS. NGUYEN: Objection, form. 16:37

A. Yeah, these two relate to each other. 16:38

Q. Does claim 1 of the '664 patent talk about using the natural language input to -- I'm sorry. Let me rephrase that. 16:38

Does claim 1 of the '664 patent relate to use a natural language interface to receive input from the user? 16:38

A. Yes, it does. 16:38

MS. NGUYEN: Objection, form. 16:39

Q. And what language in claim 1 relates to that concept? 16:39

A. Using -- at the beginning of claim 1, "using a natural language interface receiving input from a user as part of a natural language conversation between the natural language interface and the user, wherein the natural language conversation comprises a first natural language input from the user," and this is what 16:39

we were referring to, right? 16:39

Q. And then it continues and says, "and based thereon, select an automated" -- I'm sorry -- yeah, "and based thereon select an automated process to be executed." 16:39

Does that relate to claim 1 of the '664 patent? 16:39

A. So this is where it is -- it says based on and this is actually a quotation from the specifications. And the claim says on the first. 16:40

So the claim is likely -- right -- 16:40

Q. Look at line 24 of the claim. 16:40

A. I'm on -- sorry? 16:40

Q. Look at line 24 of the claim. 16:40

A. Determine -- yes, it does, yeah. 16:40

Q. Yeah, what? 16:41

A. So it relates to the paragraph, the part of the paragraph where -- so here, where it says -- we are on "based on," right? And based on -- that's where we are starting, right? 16:41

Q. So we are asking whether "Based thereon, select an automation process to be executed" relates to claim 1 of the '664. 16:41

A. Yes, so if we look at the second part of 1, it says that automation -- hang on one second. I found it before. When -- 16:41 16:42 16:42

Q. Are you referring to "determining based on the first and second natural language inputs from the user in automation process as configured"? 16:42 16:42 16:42 16:42

A. No. A combination of the beginning of that and then the executing part at the end. Because this is requiring the automation process to be executed, not just con -- I'm looking at the beginning and end of that paragraph sort of it. 16:42 16:42 16:42 16:42 16:42 16:42 16:42

Q. Where it says "executing a functionality of the displayed user interface," that's the execution? Is that what you were referring to? 16:42 16:42 16:42 16:42

A. That's what I was referring to. 16:42

Because it says, "Wherein the user interface of the computer program is configured to display on a screen, wherein the -- wherein each interaction of the sequence of interactions comprises an action selected from a group of -- group consisting of inputting data to the 16:42 16:42 16:42 16:43 16:43 16:43

H. Beigi - 11.11.24

displayed user interface and executing the functionality of the displayed user interface executing the automation process." 16:43 16:43 16:43

So I'm sort of -- "and" -- but that's also important. You need to go to the next -- so it's a combination of B and C. 16:43 16:43 16:43

Q. So you understand that "Based thereon, select an automation process to be executed," relates to the portion of claim 1 starting on line 24 that begins "determining based on the first and second natural language inputs from the user," and continuing all the way down to the end of the claim with the "executing new automation process." 16:43 16:43 16:43 16:43 16:43 16:43 16:43 16:43

Is that correct? 16:43

A. It encompasses -- so all of that, of course, is a lot more. But it encompasses what is in the description that they quoted -- that the patent board quoted on that page. 16:43 16:43 16:44

Q. And then it continues, "Where the automation process may be executed in a manner that manipulates the graphical user interface of the target system in a manner similar to the manner in which the user operates." 16:44 16:44 16:44

H. Beigi - 11.11.24

A. This goes back in the middle of the determining part. 16:44

Q. Can you read the portion that you think it relates to? 16:44

A. "An automation process configured to perform an automation of the sequence of interactions with a displayed user interface of a computer program and to simulate user interaction with the displayed user interface of the computer program." 16:44

Q. Okay. 16:44

A. And so on. 16:44

Q. Now, with respect to the '732 patent, I want you to look at claim 1 and go through the same paragraph which is also quoted on page 3 except they give the column line numbers from the '732 patent and say '732. 16:44

Do you see that? 16:45

A. Yes, starting from the '732 patent. 16:45

Q. Right, starting with "to use a natural language interface." 16:45

A. So we have that already. 16:45

Q. In the claim 1 of the '732 patent? 16:45

A. But we also have it in -- 16:45

H. Beigi - 11.11.24

Q. I'm moving on. 16:45
A. -- '664. 16:45
Q. I told you we are going to go through all three of them. 16:45
A. Okay -- I thought we got-- 16:45
Q. Don't put it away because you are going to need it later. 16:45
So I want to know whether the '732 patent, which is right here, Beigi Exhibit 9, I want you to look at claim 1, and I want to understand whether the technical solution that is talking about using a natural language interface to receive input from the user, et cetera, that we just talked about relates to claim 1 of the '732 patent. 16:45 16:46 16:46
A. Well, there is the defining, this is the second -- after the preamble of 1, it says, "defining a conversation to be implemented by a natural language interface," where we have to use a natural language interface, that's that. 16:47 16:47 16:47
"Wherein the conversation is configured to obtain from the user input from the user, one or more values to one or more parameters associated with the automation 16:47 16:47 16:47

H. Beigi - 11.11.24

process," and then we have, "Based thereon, select the automation process" -- do you want me to go that far yet? Or just- 16:47 16:47 16:47

Q. You can do the whole paragraph, that will save us time. Please. 16:47 16:48

A. So we need really the last part to take care of -- like 1[c] to take care of the execution part of it because it says that, "Publish conversation to be accessible to a user via natural language interface, wherein the user is enabled to interact with the natural language interface in accordance with the conversation whereby the parameterized automation process is invoked automatically by the natural language interface and using one or more values provided by the user to the natural language interface for the one or more parameters," which I'm assuming goes back to the parameters in the automation. 16:48 16:48 16:48 16:48 16:48 16:48 16:48 16:49 16:49 16:49 16:49 16:49 16:49

And so that would be allowing to execute, because you are now -- basically that's the action. 16:49 16:49

Q. And the invoking is the executing that you are talking about? The claim language 16:49 16:49

H. Beigi - 11.11.24

where it says "invoking," et cetera, is where you are talking about as being executing? 16:49

MS. NGUYEN: Objection, form. 16:49

A. So we have to also go back to 1[b] because this just says how you actually get the parameters. 16:50

Q. Right. 16:50

A. And then 1[b], the middle of 1[b] which says -- 16:50

Q. "Utilize a displayed user interface," is that where you are looking? 16:50

A. To utilize a displayed user interface of a computer program to simulate sequence of interactions with the displayed user interface of the computer program and execute," this is the part I meant, "execute the functionality of the computer program." 16:50

Q. Okay. And so the graphical user interface of the target system is referring to the user interface in a computer program in the claim, is that right? 16:51

A. Yes. 16:51

Q. So now let's go to the next paragraph -- 16:51

H. Beigi - 11.11.24

A. Of which one? 16:51
Q. The '664. So the first sentence says -- 16:51
A. Go ahead. 16:51
Q. So the first sentence says, "The '664 patent discloses exemplary embodiments for a nonprogrammer user to define a flow of conversation for a chatbot," and then the cites figures 1 through 3 as examples. 16:51
Do you see that? 16:51
A. I see it. But let me go through 1 through 3. So I can be confident. 16:51
Q. Absolutely. And to spare you, you will see that the identical sentence is in with respect to '732, except for it says "'732 patent" instead of '664. 16:52
A. Yes, I see that. 16:52
Q. And it is saying that figures 1 through 3 are examples of a nonprogram user to define a flow of conversation for a chatbot. Right? That's what the board said? 16:52
MS. NGUYEN: Objection, form. 16:52
A. If -- the board says that these are exemplary embodiments basically. 16:53

H. Beigi - 11.11.24

Q. For a nonprogrammer user to define the flow of conversation for a chatbot. Right? 16:53

A. Yes. 16:53

Q. Do you agree with the board that figures 1 through 3 are showing exemplary embodiments for a nonprogrammer user to define a flow of conversation for a chatbot? 16:53

MS. NGUYEN: Objection, form. 16:54

A. Well, in 23, figure -- I'm sorry, figure 2 has two parts, and then 3 -- figure 2 has a lot of parts. See it's three parts. 16:54

And so let me look at 3, I hadn't looked at three. I just looked at 2B. 16:55

Q. No problem. 16:55

A. Well, figure 2 simply selects conversations in the actual -- because what we are talking about here may define -- I'm sorry, let me go back. 16:55

Q. We are talking about -- 16:56

A. "Define a flow of conversation for a chatbot." 16:56

Q. We are talking about a nonprogrammer user to define a flow of conversation for the -- a chatbot? 16:56

A. Yes. 16:56

So what I'm saying is that figure 2, 16:56
which has three parts, in every part of it, it 16:56
is selecting a conversation. Not defining the 16:56
conversation. Right? 16:56

And then figure 1 gets the 16:56
conversation definitions from somewhere and has 16:56
a chatbot editor. So I'm assuming that -- and 16:56
this is an assumption that -- based on this 16:57
figures only -- that the chatbot editor allows 16:57
to you do what is requested here. And then 3, 16:57
create a conversation and define a conversation 16:57
flow. 16:57

So this is specifically saying 16:57
define a conversation flow. 16:57

So that figure 3 is probably more 16:57
relevant to what is stated here, but they are 16:57
stating that 1, 2 and 3 are related. 16:57

Q. Do you think the board didn't 16:57
understand the difference between figure 3 and 16:57
figure 2? 16:57

MS. NGUYEN: Objection, form. 16:57

A. I'm not saying didn't understand. 16:57
What I am saying is that they gave figures 1 16:57

H. Beigi - 11.11.24

through 3 this context as well. I'm sure they meant to provide context and these are related. Figure 3 I think is specific to, very relevant to what is done here. 16:57

Q. In the '732 patent also? 16:58

A. We are talking about '664 right now. 16:58

Q. It's the same disclosure, right? 16:58

A. Okay, what do you want me to look at? 16:58

MS. NGUYEN: Objection, form. 16:58

Q. So you think that figure 3 is the most relevant figure for talking about embodiments of a nonprogrammer user to define the flow of conversation for a chatbot and figure 1 is next most relevant because it has a chatbot editor which would do the defining but figures 2 are less relevant for that purpose, is that correct? 16:58

MS. NGUYEN: Objection. 16:58

Q. Did I summarize correctly what you said? 16:58

MS. NGUYEN: Objection, form. 16:58

A. What I am saying figures 2A, B and C are selecting. When you select, you are 16:58

selecting from available set. Agreed? 16:58

So it's selecting. Whereas what I read here is define the flow of conversation, as opposed to select a conversation, the conversation, the flow. 16:58 16:58 16:59 16:59

Q. So when you were looking at claim 1 of the '732 patent that includes a corresponding defining a conversation element, right? 16:59 16:59 16:59

A. It has a three-part, '732. 16:59

Q. One of which is defining a conversation -- 16:59 16:59

A. Defining -- defining, associating and publishing. 16:59 16:59

Q. Right. Which corresponds to figure 3 which you said was more relevant for a nonprogrammer user to define a flow of conversation for a chatbot, right? 16:59 16:59 16:59 16:59

A. I was saying that figure 3 specifically states that. 16:59 16:59

Q. Right. 16:59

A. That statement, yes. 16:59

Q. That makes it more relevant in your mind? 16:59 16:59

MS. NGUYEN: Objection, form. 16:59

A. No, it's just more direct. Not necessarily more relevant, but I'm saying it's more direct. I'm saying figure 3 is a more direct specification that is here. 16:59 16:59 16:59 17:00

Q. And do you think the board is correct to cite figure 1, all of the figure 2s and figure 3 for the proposition that each of these patents discloses exemplary embodiments for a nonprogrammer user to define a flow of conversation for a chatbot? 17:00 17:00 17:00 17:00 17:00 17:00

MS. NGUYEN: Objection, form. 17:00

A. Let me look at 64. 17:00

Well, I can tell you that neither one of these figures on their own are talking about the nonprogrammer user to define. Nonprogrammer user to define. Because they don't specifically say that this is not -- the figures. I'm not talking about the specification. 17:01 17:01 17:01 17:01 17:01

You are asking me to look at the figures and -- look at the figures and the relevance to what is stated here, and I'm saying that the figures by themselves don't necessarily tell you that each of these are nonprogrammer or 17:01 17:01 17:01 17:01 17:01

H. Beigi - 11.11.24

programmer based. 17:01

Q. So in your opinion, the figures 1, 17:01
each of the figures 2 and figure 3 from each of 17:01
the patents do not support the board's 17:01
proposition that the patents disclose exemplary 17:01
embodiments for a nonprogrammer user to define a 17:01
conversation flow for a chatbot, is that 17:01
correct? 17:02

MS. NGUYEN: Objection form. 17:02

A. That is not what I said. 17:02

What I said is just looking at the 17:02
figures -- because the board I am sure was 17:02
looking at the figures in context of the 17:02
specification of the patent and claims and the 17:02
rest of the specification. And a description of 17:02
the figure. 17:02

What I am saying is just looking 17:02
at -- which is what you asked -- just looking at 17:02
the figures, the three figures, sets of figures, 17:02
the three figures, the figures don't 17:02
specifically tell you, the figures, don't 17:02
specifically tell you that any part of this -- 17:02
not any part, but some parts of this are not 17:02
necessarily -- so when it says "select a 17:02

H. Beigi - 11.11.24

conversation of the chatbot," it doesn't specifically tell you that this is for a nonprogrammer, and it doesn't say that creating a conversation is for a nonprogrammer. The figure doesn't state that. That's -- I think that's what you are asking. 17:02 17:02 17:02 17:02 17:03

Q. I didn't say the figure alone, because it says, "see e.g. figures 1 through 3," which means that you can include additional information. 17:03 17:03 17:03 17:03

But I want to know whether you agree or disagree with the board's characterization where it cites to Exhibits -- to each of the patents, figures 1 through 3, as supporting the proposition that each of the patents disclose exemplary embodiments for a nonprogrammer user to define flow of conversation for that chatbot. 17:03 17:03 17:03 17:03 17:03 17:03 17:03 17:03

MS. NGUYEN: Objection. 17:03

Q. For a chatbot? I'm sorry. 17:03

A. Let me read to myself. Let me read the -- just for my refreshment -- the description that the patent gives for these figures. Because that has to be coming with the figures, right, not just the figures themselves. 17:03 17:03 17:03 17:03 17:03

H. Beigi - 11.11.24

Q. I'm just trying to understand whether you agree or disagree with what the board wrote. 17:03

A. Well, I'm -- let me read -- 17:03

Q. If you need to read the description to know whether the figures support that, then you can do that. Counsel wants to end in ten minutes. And I do have other questions I would like to get to, but you do what you need to do. 17:03

A. Let me read this. 17:04

Q. Dr. Beigi, if you are not sure, we can withdraw the question and move on. 17:06

A. I'm doing one by one, so I can tell you about one I saw referenced in the body of the -- in the specification of the patent which does specify that it is for -- let me -- 17:06

Q. A nonprogrammer user? 17:07

A. For a nonprogrammer user. And then I was looking at 2 when you asked me. 17:07

Q. If you don't mind, I would like to move on to another question. 17:07

A. Okay. 17:07

Q. The opinions in all three cases go on to say, "For example, a user may define which 17:07

H. Beigi - 11.11.24

questions the bot would ask, which remarks it will make and flow control operations that would be based on the value conditions," with a cite to the quotes, and then it goes further, "The user may define for a conversation flow which automation process is invoked or that a conversation flow is associated with multiple automation processes, one of which may be selected based on interaction with the user," again cite to the quote, and then "the automation process may also be defined by a user." 17:07

In each of those examples that the board calls out, they point out the role of the user in the definition process. 17:07 17:08 17:08

Do you see that? 17:08

A. Yes. 17:08

Q. Do you believe that the board properly understood the disclosure of the three patents as involving a user in the definition process? 17:08 17:08 17:08

MS. NGUYEN: Objection, form. 17:08

Q. With respect to the conversation flow? 17:08

H. Beigi - 11.11.24

A. With respect to the conversation flow, a user may define a conversation, yes. 17:08

MR. MACEDO: Okay, Counsel, I know you wanted a break. 17:08

I would like to do one more question and maybe go five minutes over, but I promise I will make it quick. 17:08

MS. NGUYEN: Sure. 17:08

Q. So on the next page, you see all the patents are referring to figure 2A, in the sheet? 17:08

A. I will just compare. 17:09

Yes. 17:09

Q. Okay. Now, your understanding is that figure 3 is more relevant to the definition process is which is being covered in the '732 patent than figure 2A, is that correct? 17:09

MS. NGUYEN: Objection, form. 17:09

A. That was where I was actually -- I was looking at 2A. 17:09

So when you said you wanted to change the line of questioning -- 17:09

Q. Okay, I'll withdraw that question until tomorrow and ask you a different one. 17:09

H. Beigi - 11.11.24

Do you see where it says, "After the chatbot is launched, step 210, the user may interact with the chatbot using natural language processing techniques and the appropriate conversation may be selected, step 220." 17:09

A. Yes. 17:09

Q. Do you understand that that is relevant for the '664 patent? 17:09

MS. NGUYEN: Objection, form. 17:10

Q. And when I said '664 patent, I meant claim 1. 17:10

A. Claim 1. Yes. 17:10

Q. And how is it relevant? 17:10

A. Sorry, ask the question how it is relevant -- 17:10

Q. The statement that after the chatbot is launched, step 210, the user may interact with the chatbot using natural language processing techniques? 17:11

A. That's the part I've lost. I'm sorry, where is that? 17:11

Q. This is on page 4, it's one, two, three, four, five -- six lines from the bottom. 17:11

A. Okay. After the chap is launched. 17:11

H. Beigi - 11.11.24

Q. Right. So we were looking at, "After the chatbot is launched, step 210, the user may interact with the chatbot using natural language processing techniques and the appropriate conversation may be selected, step 220," with a cite to the specification. 17:11

A. Yes, yes, I see that. 17:11

Q. And what I want to know how does that relate to claim 1 of the '664 patent? 17:11

MS. NGUYEN: Objection, form. 17:13

A. So you're asking me to relate this statement to claim 1? 17:13

Q. Of the '664. 17:13

MS. NGUYEN: Same objection. 17:14

A. The only thing that I can see that may possibly be relevant is the second part of the claim. 17:16

But -- 17:16

Q. Which language are you -- which language are you referring to? 17:16

A. I'm not quite sure with that because it says, "Based on the first and second natural language inputs from the user and automation process interaction." I'm sorry -- "an 17:16

H. Beigi - 11.11.24

automation process configured to perform an automation of a sequence of interactions with a displayed user interface," and so on and so forth. Because what this statement is asking for, so it says, "user interacts with the chatbot using natural language techniques -- process techniques and the appropriate conversation may be selected." 17:16

So the appropriate conversation, not the appropriate automation. The appropriate conversation is selected. 17:16

Q. And that's -- 17:16

A. So I am not seeing that and I'm -- maybe it's just because I'm really tired at the end of the day, but I cannot -- I don't see where you're selecting a conversation in claim 1. 17:17

Q. And do you think that, putting aside the selection, that it talks about the user may interact with the chatbot using natural language techniques, do you think that that's referring to the natural language interface that's being used in the first element of claim 1? 17:17

MS. NGUYEN: Objection, form. 17:17

H. Beigi - 11.11.24

A. Well, I think it's a combination, not just that part, but I think it's a combination of the -- 1[a] and 1[b] which says that you are using natural language processing techniques, or NLP, because receiving an input from a -- this is now I'm going to the first part. 17:17 17:17 17:17 17:18 17:18 17:18 17:18

Receiving an input is just receiving an input. Right. So it hasn't used natural language processing yet. 17:18 17:18 17:18

As part of the natural language conversation between the natural language interface and the user, wherein the natural language conversation comprises a first natural language input from the user, a natural language feedback on the first natural language input and the natural language -- from the natural language interface, I'm sorry, and the second natural language input from a user in response to the natural language feedback. 17:18 17:18 17:18 17:18 17:18 17:18 17:18 17:18 17:18 17:18

But yet, we haven't talked about natural language processing part of it. 17:18 17:18

Then we say determining based on the first and second natural language input from the 17:18 17:19

H. Beigi - 11.11.24

user and automation process configured. 17:19

So here is I think where natural language processing is being used because determining based on the first and second natural language input from the user, an automation process is configured to perform an automation of the sequence of interactions. 17:19

So here, it establishes that natural language processing is used. 17:19

Q. Perfect, thank you. 17:19

MR. MACEDO: We will stop for today and we will see you tomorrow morning at 9 o'clock and hope you get a good night's rest. Thank you very much for were your time. I appreciate it. 17:19

(Time noted: 5:19 p.m.) 17:19

_____
HOMAYOON BEIGI

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

_____

H. Beigi - 11.11.24

INDEX:

WITNESS	EXAM BY:	PAGE:
H. Beigi	Mr. Macedo	4

EXHIBIT INDEX:

NUMBER	DESCRIPTION	PAGE:
Exhibit 22	document entitled "Notice of Deposition of Dr. Homayoon Beigi,"	4
Exhibit 23	document entitled "Notice of Deposition of Dr. Homayoon Beigi,"	5
Exhibit 24	document entitled "Notice of Deposition of Dr. Homayoon Beigi,"	5
Exhibit 25	deposition transcript of Homayoon Beigi, dated June 25, 2024,	7
Exhibit 26	deposition transcript of Homayoon Beigi, dated June 26, 2024, Volume 2,	9
Exhibit 27	document entitled "Reply Declaration of Dr. Homayoon Beigi,"	10

H. Beigi - 11.11.24

EXHIBIT INDEX:

NUMBER	DESCRIPTION	PAGE:
Exhibit 28	document entitled "Reply Declaration of Dr. Homayoon Beigi,"	11
Exhibit 29	document entitled "Reply Declaration of Dr. Homayoon Beigi,"	11
Exhibit 30	document entitled "Supplemental Declaration of Ivan Zatkovich Pursuant to 37 CFR Section 42.64(b)(2) in Response to Petitioners Objection to Evidence and Providing Supplemental Evidence for Inter Partes Review of Claims 1-9, 12-16, 18-23, 25-26, 28-31, and 33 of U.S. Patent No. 10,819,664,"	108
Exhibit 31	screenshot from Medium.org,	113
Exhibit 32	screenshot from Medium.org,	114
Exhibit 33	screenshot from Medium.org,	114

H. Beigi - 11.11.24

EXHIBIT INDEX:

NUMBER	DESCRIPTION	PAGE:
Exhibit 34	document entitled "Supplemental Declaration of Ivan Zatkovich Pursuant to 37 CFR Section 42.64(b)(2) in Response to Petitioner's Objection to Evidence and Providing Supplemental Evidence for Inter Partes Review of Claims 1-6, 9-16, and 18-21 of U.S. Patent No. 11,258,732,"	133
Exhibit 35	document entitled "Supplemental Declaration of Ivan Zatkovich Pursuant to 37 CFR Section 42.64(b)(2) in Response to Petitioner's Objection to Evidence and Providing Supplemental Evidence for Inter Partes Review of Claims 1-20 of U.S. Patent No. 11,558,317,"	136

H. Beigi - 11.11.24

EXHIBIT INDEX:

NUMBER	DESCRIPTION	PAGE:
Exhibit 36	document entitled "When Chatbots	138
Exhibit 37	article entitled "Using artificial intelligence to optimize the value of robotic process automation,"	195

H. Beigi - 11.11.24

CERTIFICATE

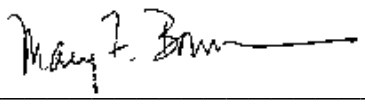
STATE OF NEW JERSEY)
)ss:
COUNTY OF UNION)

I, MARY F. BOWMAN, a Registered Professional Reporter, Certified Realtime Reporter, and Notary Public within and for the State of New Jersey, do hereby certify:

That HOMAYOON BEIGI, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.

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

In witness whereof, I have hereunto set my hand this 14th day of November, 2024.



MARY F. BOWMAN, RPR, CRR

H. Beigi - 11.11.24

* * *ERRATA SHEET* * *

NAME OF CASE: Whatfix v. Walkme

DATE OF DEPOSITION: 11.11.24

NAME OF WITNESS: HOMAYOON BEIGI

Reason codes:

1. To clarify the record.
2. To conform to the facts.
3. To correct transcription errors.

Page _____ Line _____ Reason_____
From _____ to_____

Page _____ Line _____ Reason_____
From _____ to_____

Page _____ Line _____ Reason_____
From _____ to_____

Page _____ Line _____ Reason_____
From _____ to_____

Page _____ Line _____ Reason_____
From _____ to_____

Page _____ Line _____ Reason_____
From _____ to_____

Page _____ Line _____ Reason_____
From _____ to_____

_____
HOMAYOON BEIGI

0

00065
135:6
174:25

1

1
15:2 28:5
34:23
36:19
38:2 42:5
72:4,11
80:16
82:24
83:19
84:15
108:4
134:20
136:13
148:16
166:5,6
178:24
195:21
196:8,23
197:4,7,
14 198:9,
14 201:2,
10,12,14,
23 209:2
242:12
254:5,9,
12,17,20
255:7,25
256:3
257:10
258:15,24
259:11,
16,18
262:10,
12,19
263:6
264:7,19,
25 265:16
266:7
267:7
268:3
269:9,15
273:12,13
274:10,13
275:18,24

1-20
136:22

1-6
133:25

1-9
108:15

10
20:21
90:23
92:17
98:3
115:21
116:11,
12,23
162:8
165:3,7
245:12

10,000
87:11

10,819,664
4:18
10:17
12:7,24
20:4
108:6,17
245:9

100
87:20
244:15

100,000
86:19
87:2,5,8,
9

1001
13:10
19:21
20:4,20
21:7
143:8
246:25

1003
18:4,7,13
19:3
84:21,25

101
244:17

1011
195:16

10:19
58:14

10:30
59:4

11
59:5

11,258,732
5:4 11:2
134:2,22
245:14

11,558,317
5:13
136:14,23
163:11
165:4
245:19

11.11.24
4:1 5:1
6:1 7:1
8:1 9:1
10:1 11:1
12:1 13:1
14:1 15:1
16:1 17:1
18:1 19:1
20:1 21:1
22:1 23:1
24:1 25:1
26:1 27:1
28:1 29:1
30:1 31:1
32:1 33:1
34:1 35:1
36:1 37:1
38:1 39:1
40:1 41:1
42:1 43:1
44:1 45:1
46:1 47:1
48:1 49:1
50:1 51:1
52:1 53:1
54:1 55:1
56:1 57:1
58:1 59:1
60:1 61:1
62:1 63:1
64:1 65:1
66:1 67:1
68:1 69:1
70:1 71:1
72:1 73:1
74:1 75:1
76:1 77:1
78:1 79:1
80:1 81:1
82:1 83:1
84:1 85:1
86:1 87:1
88:1 89:1
90:1 91:1
92:1 93:1
94:1 95:1
96:1 97:1
98:1 99:1
100:1
101:1
102:1
103:1
104:1
105:1
106:1
107:1
108:1
109:1
110:1
111:1
112:1
113:1
114:1
115:1
116:1
117:1
118:1
119:1
120:1
121:1
122:1
123:1
124:1
125:1
126:1
127:1
128:1
129:1
130:1
131:1
132:1
133:1
134:1
135:1
136:1
137:1
138:1
139:1
140:1
141:1
142:1
143:1
144:1
145:1
146:1
147:1
148:1
149:1
150:1
151:1
152:1
153:1
154:1
155:1
156:1
157:1
158:1

159:1
160:1
161:1
162:1
163:1
164:1
165:1
166:1
167:1
168:1
169:1
170:1
171:1
172:1
173:1
174:1
175:1
176:1
177:1
178:1
179:1
180:1
181:1
182:1
183:1
184:1
185:1
186:1
187:1
188:1
189:1
190:1
191:1
192:1
193:1
194:1
195:1
196:1
197:1
198:1
199:1
200:1
201:1
202:1
203:1
204:1
205:1
206:1
207:1
208:1
209:1
210:1
211:1
212:1
213:1
214:1
215:1
216:1
217:1
218:1
219:1
220:1
221:1
222:1
223:1
224:1
225:1
226:1
227:1
228:1
229:1
230:1
231:1
232:1
233:1
234:1
235:1
236:1
237:1
238:1
239:1
240:1
241:1
242:1
243:1
244:1
245:1
246:1
247:1
248:1
249:1
250:1
251:1
252:1
253:1
254:1
255:1
256:1
257:1
258:1
259:1
260:1
261:1
262:1
263:1
264:1
265:1
266:1
267:1
268:1
269:1
270:1
271:1
272:1
273:1
274:1
275:1
276:1
277:1

11558317
11:11

12
108:4
111:18
245:6

12-16
108:15

13
111:17,18
216:20
217:6

1379
135:5
140:17

14
216:21
217:11

15
28:14
245:5,24
246:22
248:8,18
252:14

16
36:20
37:6
108:4
134:20
165:6,18

17
109:14
245:11,24
247:10
250:22

18
27:25
28:6
108:4
116:7
134:21
143:8
245:16,24
247:12

18,2024
138:8

18-21
133:25

18-23
108:15

1970s
40:10

1975
38:23
39:2,24

1[a
203:14
276:4

1[b
171:2,3,
5,8 172:9
183:14
185:9
203:23
209:3
214:23
219:10,12
243:9,18,
20 244:5,
7,13,20
261:5,9
276:4

1[b]
176:19

1[c
219:15
260:8

1[d
183:15
219:19
228:2

1[e
165:25
166:6
167:9,13
169:6
172:22
230:25
231:2,8

1[f
241:24
242:5

1[g
242:5
243:14

1[h
242:5
244:15

2

2
9:8,11

14:25
15:2,4
85:3
111:2
263:11,16
264:3,19,
22 265:18
268:4
270:20

20
90:23,24
91:13,15,
22,25
92:8,17,
21,24
98:3
136:14
195:21
196:8
245:6,12

20,000
87:13

2000
106:18

2001
102:10,14
103:24
104:24
111:10
112:4

2002
111:10

2003
111:10

2004
111:11

2005
111:11
137:15
147:11,
15,17
148:20
150:7
161:4

2006
111:11

2007
111:11

2008
111:11
132:12,24

2009
111:11

2010
111:12

2011
111:19

2012
111:17

2014
107:23
108:22
134:23
137:14,25
138:15,21
139:8
140:10,19
141:7
160:21

2015
112:10,
11,19,23
115:12
137:15

2016
113:21
137:15

2017
69:6
114:19
137:16

2018
112:12
115:21
116:12,
13,23
162:8

2023
84:20

2023-01368
18:14
245:8

2023-01379
245:13

2024
7:3,5
9:8,10
12:23
245:6,12

2024-00065
245:18

21
134:21

210
273:3,18
274:3

22
4:15,19
5:19

220
273:6
274:7

23
4:24 5:5,
23 108:5
263:10

24
5:10,14
6:3 37:6
255:14,16
257:11

25
6:25 7:2,
3,4,5
12:23
27:24
28:5,14
36:20
108:5
141:4,12,
22 142:6

25-26
108:15

250
94:22
95:2,11,
16 146:2

26
9:7,8,9,
10,13,16
108:5

27
10:14,18
11:24
13:14,19,
25 14:9,
15 60:2
61:18
84:14
90:11,21
91:14
92:9 93:6
94:13
100:9,14
105:5,25
106:12,13
111:8
117:9
165:7
195:19

28
10:23
11:3
91:16
93:6
94:13
102:20
108:5
137:6

28-31
108:16

29
11:8,12
91:16
93:7
94:14
109:14,17
141:2,21
142:6,19

2A
265:24
272:11,
18,21

2B
263:14

2s
267:7

3

3
100:15
102:20
111:2
122:20
165:9
246:24
250:22
252:14
258:17
262:10,
13,20
263:6,11,
13
264:12,
17,19,21
265:2,4,
12
266:16,19
267:4,8
268:4
269:9,15
272:16

30
84:20
93:8 94:8
98:4
108:8,9,
20 110:15
111:2
138:4
140:13
160:22
188:20

300,000
86:17

31
108:5
113:11,14
115:2,12
116:20
148:10,13
149:2
161:20
162:7,9

317
111:14,15
141:4
158:5
159:4,25
163:17
164:16,
22,23
165:18
167:15
174:25
178:23
187:12
193:7,19
196:24
197:7
198:9,14
201:2
232:11,15
234:11
235:24
238:25
242:12
251:22

32
113:19
114:10
115:2
148:10,16
149:2
152:14
161:20

33
108:5,16
114:18,22
115:2
138:3
141:4,13
148:10,18
149:2
161:20

34
133:19
134:16
135:5
138:3,4
139:9
140:22
160:22

35
93:8,9
135:5
136:9,16,
25 138:3,
4 160:22

36
59:25
60:4,5,6,
7,11
61:17
138:6
147:10
148:9
150:6
161:5,9

37
107:25
108:11
133:21
134:17
136:10,18
171:9,10
195:9,16

38
171:9
200:5

392
137:14
139:2
144:14

3:58
138:8

4

4
252:25
253:8
273:23

40
93:9 94:8
95:7,12,
16 96:5,
6,21
99:21
103:20
145:24
146:6

40,000
87:19

402
137:14
144:15

42
137:9

42.64(b)(2)
107:25
108:12
133:22
134:17
136:11,19

43
141:6,14,
23

45
60:7
165:25
166:11

450
17:8

46
117:12
118:2,3
165:25
166:2

47
166:2

48
117:21

49
4:13
117:17,22
126:8,14

5

5
106:2,11

50
96:15,17,
22 117:18

50,000
86:21,25
87:16

500
17:9

500,000
88:12,15,
24 89:9

52
137:10

5:19
277:17

6

6
106:2,11
134:20

60
87:25
91:21

63
94:13
95:4
142:19

634
138:13

64
267:13

65
252:24
253:7

664
12:4,5,
10,18
13:5
27:20
28:14
36:17
37:7 38:2
41:9
43:20
70:24
71:17
72:5,12
77:5 79:4
80:15
81:17,23
82:24
83:19
91:18

92:16
107:6,7,
13 111:20
124:17
140:9,15
246:25
248:8,18,
19 249:3
250:17
252:3,10,
16 253:6,
10,11,21,
23 254:3,
5,9,12
255:8,25
259:3
262:3,7,
17 265:7
273:9,11
274:10,14

7

7
100:24
102:18
106:2,11
163:8
166:3,11
167:16
168:9
174:24
181:19
182:13
195:19
196:25
197:9
200:8
242:12

70
201:22,25

72
137:11

732
111:14,15
137:7
138:11,18
140:18
164:4
250:21
251:7
253:13
258:14,
18,20,24
259:9,16
262:16
265:6
266:8,10
272:17

75
39:22
87:23
99:2
183:5

75-or-so-page
99:15

75-page
100:8

76
90:25
94:12
95:4
100:10
183:5

77
183:6

78
204:4

79
98:15
171:20,21
172:20
206:21
209:13,
15,17,23
210:2,15

8

8
12:23
13:6,14
28:15
37:8
106:3,11
252:24
253:7,19

81
212:18

83
172:9
173:16
174:15,
19,23
175:5,17,
19,20
176:10
214:24

87
184:10
185:7
219:21
221:16

88
166:19
183:12,
13,15,16,
25 184:4,
10 185:7

89
184:10
185:7

9

9
108:4
134:20
252:24
253:8,13
259:10
277:13

9-16
133:25

90
184:10
185:7,9
223:7

91
166:16
168:8
169:15
170:16,24
231:2,21,
24

92
166:16
168:8
169:15
170:16,
23,24
171:4
231:2,4

95
94:13
95:4

98
243:8

99
243:8,16
244:10

9:08
58:17

A

ability
14:3,4

Absolutely
112:14
164:25
165:23
262:14

accept
145:10
241:8

accepting
207:14

access
8:23
144:18
179:11
223:14
232:12
237:12
239:6
240:17
241:19

accessed
215:14
216:2
217:15
238:22

accesses
240:2

accessible
222:15
260:10

accessing
187:15
218:7,9
237:16

accordance
260:13

account
156:2

accurate
139:22
149:15,16
150:9
161:15
220:3

accurately
148:20
149:3

act
118:11,15
206:8

acting
218:7

action
225:21,22
229:21,24
256:24
260:23

active
19:6 89:5

activity
178:11

actual
99:4,11
121:12,14
125:4
144:9
225:17
229:20,24
250:23
251:12
263:17

add
18:23
37:3
174:17

addition
19:23
168:13
207:15,17
243:19
244:6

additional
19:2
199:12
269:10

additionally
173:17
174:16
183:22

address
214:16

adds
182:22,23
184:21

adopt
82:21
83:14,17

advertisements
115:6,7

AF
242:11

affiliated
154:19

agree
6:13
82:14,15,19 103:9
132:15
150:15
161:14,17,19,23
182:12,23
188:19
202:10
220:19
263:5
269:12
270:3

Agreed
266:2

agrees
158:23
208:19

ahead
10:11
113:7
238:12
262:5

AI
64:25
129:4

albeit
140:19

algorithms
96:24
97:16

Allen
237:2

allowed
189:5,9

allowing
188:9
193:25
194:2
260:21

alternate
250:10

alternative
198:15
207:5
209:14
219:11
220:13

Amazon
236:22,23

Amazon.com
236:17,20

amount
16:3,12,14 92:19
174:8
177:4
186:11

amounts
87:18

analysis
81:16
95:17,19
97:6
105:25
158:5,22
159:3
160:2
163:17
168:6
169:4
180:4
202:7

answering
49:7
50:17
120:24
121:2,8
190:22
194:3,7
211:9

answers
71:23
191:20,22

anticipates
210:20
211:6,25

anticipating
210:25
211:17

anticipation
197:21
198:3
213:23
214:18

anymore
87:10

API
221:6
242:20,23

apologize
116:17
191:24
192:4

app
239:19

Apparently
119:15

appearing
6:8

appears
167:9

application
169:20
176:4,5
238:20,22
240:13
241:2,19
242:24
248:20

applications
169:19

applying
25:10
36:18

approved
118:13

approximately
91:21,22
93:5 98:3

architectures
99:5

archive.org
20:10

archived.org.
97:21

area
29:18

argument
186:22
198:5
241:9

arguments
110:19,20
196:17
197:23,25

Arinti
153:10,12
157:25
160:4
163:20
164:10
212:12
233:4

arrow
226:7

art
21:2
24:24
27:6
29:13,17
37:10
71:17
81:17
116:5
155:14
175:14
200:11,
12,14,19,
22,23
213:7

article
113:3,22
116:8,24
117:3
147:18,
19,22
149:10,20
150:13
153:3
161:22
195:9,17
215:24
217:13

article/blog
115:17

artificial
62:19
63:4 69:3
195:10

artificially
42:4

asks
210:21

aspect
157:21
166:12
178:24
203:22

aspects
42:9
196:21
197:4,7
198:5

asserting
182:12
184:7
228:9
229:8,15

assertion
209:23
210:15

assess
200:9

assessment
220:19

assistants
204:14

associating
266:13

association
158:20
229:23

assume
127:3
156:8,13
233:3
237:24
238:17

assuming
39:5
156:16
241:8
260:19
264:9

assumption
79:18
264:10

assumptions
34:17

attention
137:12
153:24

August
84:20

authenticity
161:8

author
151:24
152:5

authoritative
132:16

authority
133:4,7,
9,11

automated
164:11
213:19
255:4,6

automates
171:16

automatic
213:15

automatically
124:21,24
125:11,13
166:20
183:19,23
184:13
192:6
224:22
260:15

automation
152:17
166:7
168:20
170:21
171:6,19
173:2
175:8
179:19
182:20
185:11
195:11
204:7
205:7
210:11
212:2,11,
13 214:9
215:21
218:20,21
219:17,25
228:3
233:14,21
242:22
248:21,22
249:14,23
250:16
251:8,12
252:19,20
255:24
256:3,7,
11 257:4,
9,15,22
258:6,7
259:25
260:3,14,
20 271:7,
9,12
274:24
275:2,3,
11 277:2,
7,8

averring
146:17

avoid
248:13

avoiding
145:12

aware
44:19
142:2,4
184:2,13
213:22
214:3,5,
13

B

B2
4:18 5:4,
13 165:4

back
8:11
23:17
34:7
36:14
38:9,23
39:2,18
43:2,17
44:5,15
47:3 49:5
51:17
52:3 54:7
57:24
73:4,20
77:17
78:16

84:13
96:4
98:11
100:14
102:24
103:3
105:6
117:20,
21,25
124:4,6
134:5
137:4
140:8
160:15
163:4
171:2,8
173:22
195:5
208:8
221:15
258:2
260:19
261:5
263:19

back-end
218:20

background
17:23

backup
207:20,23
208:2,13
209:3

bad
80:5

Baetens
70:10
118:9
119:20
126:24
128:15
129:9,17
151:20
153:17
213:3
214:14

Baetens'
153:9

ballpark
15:23,24
16:15
17:8
85:11,14,
21 90:22
91:3,11
92:5
93:10
146:7

ballparks
93:13

barely
58:10,18,
20

barrier
26:5,14
30:18

base
212:20
252:18

based
34:9,10
36:11
43:12
51:8 67:7
78:24
79:2
80:21,25
81:14
82:11
92:16
101:5,15,
19
124:12,
16,20,22
127:5,23
128:17
129:25
130:3
143:17
155:7
162:10
173:4
196:24
207:5
211:24
214:11
218:10,13
225:20
228:12
232:19
244:12
255:4,5,
10,21,23
256:6
257:8,12
260:2
264:10
268:2
271:4,10
274:23
276:24
277:5

basic
39:6,10,
12,14,16,
19 40:9,
16,20,21,
22 41:19,
22 42:3
63:6,7,
15,19,21,
22 66:9

basically
18:18
47:7
48:17
70:12
115:9
127:6,10,
21
166:22,24
171:3,10,
13 173:3,
8 178:12
186:7
199:22
206:19
219:4
223:14
225:2
229:4
232:8
240:18
241:15
249:16,
17,25
253:15,17
260:22
262:25

basis
170:19

batch-like
122:20

becauses
169:5

began
215:9

begin
135:8

beginning
254:19
256:9,13

begins
257:11

beholder
131:2

Beigi
4:1,2,10,
12,15,17,
21,24
5:1,2,7,
10,11,16,
18 6:1
7:1,2,3,
5,10 8:1,
22 9:1,7,
10,13,15
10:1,14,
15,19,23,
24 11:1,
4,8,9,13,
16,24
12:1,13,
22 13:1,
6,14,18,
25 14:1,
9,15 15:1
16:1 17:1
18:1 19:1
20:1 21:1
22:1 23:1
24:1 25:1
26:1 27:1
28:1,15
29:1 30:1
31:1 32:1
33:1 34:1
35:1 36:1
37:1,7
38:1 39:1
40:1 41:1
42:1 43:1
44:1 45:1
46:1 47:1
48:1 49:1
50:1 51:1
52:1 53:1
54:1 55:1
56:1 57:1
58:1
59:1,2,
23,25
60:1
61:1,18
62:1 63:1
64:1 65:1
66:1 67:1
68:1 69:1
70:1 71:1
72:1 73:1
74:1 75:1
76:1
77:1,19
78:1 79:1
80:1 81:1

82:1 83:1
84:1,13
85:1 86:1
87:1 88:1
89:1
90:1,20
91:1,14,
16 92:1,9
93:1,15
94:1 95:1
96:1 97:1
98:1 99:1
100:1,9,
14 101:1
102:1
103:1
104:1
105:1,25
106:1,12,
13 107:1
108:1,7,
19 109:1
110:1,14
111:1,8
112:1
113:1
114:1
115:1
116:1
117:1,15
118:1
119:1
120:1
121:1
122:1
123:1
124:1
125:1
126:1
127:1
128:1
129:1
130:1
131:1
132:1
133:1
134:1,5
135:1
136:1
137:1
138:1
139:1
140:1
141:1,2
142:1
143:1
144:1
145:1
146:1
147:1
148:1,9
149:1
150:1,6
151:1
152:1,14
153:1
154:1
155:1
156:1
157:1
158:1
159:1
160:1
161:1,5
162:1
163:1,8,
10 164:1,
23 165:1,
10 166:1,
2 167:1,
16 168:1,
9 169:1
170:1
171:1,22
172:1,2
173:1
174:1,24
175:1
176:1
177:1
178:1
179:1
180:1
181:1,19
182:1,13
183:1
184:1
185:1
186:1
187:1
188:1
189:1
190:1
191:1
192:1
193:1
194:1,11
195:1,15,
19 196:1,
25 197:1,
9 198:1
199:1
200:1,7
201:1
202:1
203:1
204:1
205:1
206:1
207:1
208:1
209:1
210:1
211:1
212:1
213:1
214:1
215:1
216:1
217:1,6
218:1
219:1
220:1
221:1
222:1
223:1
224:1
225:1
226:1
227:1
228:1
229:1
230:1
231:1
232:1
233:1
234:1
235:1
236:1
237:1
238:1
239:1
240:1
241:1
242:1,6,
12 243:1
244:1
245:1,5,
11,16,24
246:1
247:1,9,
12 248:1,
8,18
249:1
250:1
251:1
252:1
253:1
254:1
255:1
256:1
257:1
258:1
259:1,10
260:1
261:1
262:1
263:1
264:1
265:1
266:1
267:1
268:1
269:1
270:1,12
271:1
272:1
273:1
274:1
275:1
276:1
277:1

belief
143:3,19

believed
133:8
143:4,19

believes
100:25
102:12

belonged
69:23

benefit
95:6

Bie
240:2,7,9

Bie's
233:9

bigger
10:3

billed
89:18,19,
22

bit
44:25
117:21
150:22
231:12,14

black
60:12,17,
21 61:17

blanket
50:4

blue
75:18

board
16:8,25
81:9

157:23
158:22
159:7
191:5,6
246:9,15
247:23
250:14
253:5
257:20
262:22,24
263:5
264:20
267:6
268:13
270:4
271:15,19

board's
241:4
268:5
269:13

body
270:15

book
26:20,22
27:7,14
96:8,9,
12,13
236:11,
17,21,22

bot
116:2
117:3
119:13
121:21
125:25
150:25
151:4
166:20
183:20,22
192:6
203:17
209:7
271:2

bothers
241:6

bots
115:14
138:7
147:23
150:19
204:11

bottom
13:10
137:10
150:13,14
166:10
273:24

Bouton
4:13

box
56:2
60:12,17,
19,21,23,
24 61:2,
17,23
74:3,6,
13,19,22
223:2
226:6,7,
14

brain
68:19
126:22

break
9:3 20:12
54:21
57:19,21
58:2,6,7,
9,23
59:3,8
91:7
114:14
125:17
132:7
133:17
134:15
182:8
188:18,20
189:16
190:4,18
194:9
195:4,15
215:5
241:25
272:5

breaks
59:17

bring
8:24

bringing
26:11
27:12

brings
176:20

brought
8:25

browser
166:21,24
167:19,22
168:19
170:3
176:8
177:22,23
178:5,11,
16
179:12,18
181:6
183:19
184:2,3,
14,15,16
186:6
187:15,
21,22,23,
25 192:6,
10,17,18,
20,23
193:17
215:13,
14,19,20
216:2
217:15,
21,22
218:2,7,
15,18,23
219:7
220:20
222:24
228:15,
17,18,20
229:10,
11,13
230:3,15
232:7,8
233:21
235:5,6,7
238:19
239:16,
19,23
240:16
241:2,6,
7,9,11,
12,13,16,
19

browsers
169:23,25

building
77:22

bunch
50:22
62:17
205:6
251:18

business
159:13
212:8,11

button
74:5,21
224:20,22
225:13,14

buttons
61:3,6
62:4

buy
26:19,21
27:7,14

buying
236:11,
17,21,22

C

call
48:4
119:15,16
122:5,19
125:5
126:24
130:10
158:12
185:18
191:5
206:24
207:8
209:6

called
4:3 21:17
40:22
69:15
82:4
147:19
163:12
237:2

calling
185:13

calls
85:16
120:20
121:23,25
271:15

capabilities
19:5
197:12,13
240:17
241:15

capability
168:18
177:21
180:25

184:19
187:14,17
215:18

capable
134:8,12
181:5

capacity
250:2

capital
39:11
40:9,20
41:20,22
42:3
63:6,8,15
66:9

capture
198:17

care
17:3
125:5,22
260:8

careful
33:15

carryover
141:6,14

carve
175:21

carved-out
54:15

case
17:21
40:8
53:24
69:2
88:9,13,
16 138:15
182:23
204:2
207:11,12
230:4

cases
10:9
43:18
47:10
74:10
89:22,23
158:10
199:3
270:24

caught
220:16

cetera
259:15
261:2

CFR
107:25
108:11
133:21
134:17
136:10,18

chance
97:20

change
36:4,21
37:2,16
38:12
68:24
77:18
147:3
159:23
198:7
204:23
272:23

changed
18:7 24:2
134:11
199:11
202:23

changing
77:13

chap
273:25

Char-pa
158:12

characterization
269:13

characterized
202:11

charge
122:13

charging
16:10
17:2,12

chat
61:23
119:13,16
203:17

chat-based
248:20
249:24

chatbot
61:24
70:9
75:14
76:18,22
82:4,5,
14,15
83:8
84:2,3
114:6
115:25
117:2
118:6,22
119:4,16,
21
121:10,20
122:3,13
124:22
125:9,10
126:24,25
127:3,4,
6,18
128:16,
19,24
129:2,8,
10,13,14
130:4,6,
8,10,12,
16,19,22
131:6,9,
14,19,20,
21 132:3,
14,17,25
133:10,
11,14
150:24
151:3
152:15,25
153:2,6,
8,10
156:18
157:11
158:3,9,
16
159:14,
15,17
160:4
163:20
164:10
206:23
207:7
209:5
213:4
214:15
222:3
229:22
233:4
234:12,
21,24
235:20
236:2
240:21
242:23,25
248:23
249:24
262:9,21
263:3,8,
22,25
264:9,11
265:15,17
266:18
267:11
268:8
269:2,18,
20 273:3,
4,17,19
274:3,4
275:7,21

chatbots
19:10
115:14
122:22
138:7
147:23
150:18
161:22
204:11,13
249:15
250:17
251:9

check
94:18
142:5,8
145:5
149:18

checking
144:6,7,
8,22

child
47:12

choice
61:6

choose
194:18
205:16

citation
142:6

cite
137:13
144:4
243:2
252:9
267:7
271:4,11
274:7

cited
102:17
140:10
141:7
144:15

cites
144:5,22
248:23
252:24
262:9
269:14

citing
141:23
145:6

Citrix
170:2
232:4,5,11,13,17,23
233:10,20
237:10,17,25
238:5,7,23,24
239:5,24
240:3,6,12,16
241:18

claim
28:5 32:9
34:5,10,11,23
35:9,13
36:3,5,19,22,25
37:4 38:2
42:5
43:24
51:9
52:20,21,22 53:11
72:4,11
80:16
82:22,24
83:14,17,19,20
84:7
165:6,18
166:5,6
178:24
180:16
196:23
197:4,7,14 198:9,14
200:13,19,24
201:2,10,12,14,23
227:25
234:11
237:13,15
242:12
250:6
254:4,9,12,17,19
255:7,11,13,14,16,25
257:10,14
258:15,24
259:11,16
260:25
261:22
266:7
273:12,13
274:10,13,18
275:17,24

claimed
67:7
180:13
193:6

claims
27:23
28:3
83:24
84:8,9,12
108:4,15
133:25
134:20
136:13,22
182:15
195:21
196:8,11,14 198:25
235:7
249:3
250:18
268:15

clarification
190:24

clarified
37:23

clarifies
37:19
242:21

clarify
94:3
207:19

clarity
230:19
231:18

clause
42:14

clear
23:23
46:21
50:7 52:6
78:16
137:23
182:12
199:8
207:7
208:13,15
215:24
217:14
218:6
219:3
250:11

clicked
224:20,22
225:14

clicking
225:22

clicks
183:23
225:13

client
17:3,12

clients
89:23,25

climber
222:24

clipboard
228:23,24
229:3,5

close
66:23
247:11

coach
190:13

code
64:15,20
82:5,9
121:12,15
124:19
125:4
126:10
127:24
128:4,10,13 129:6,20,21
143:9
151:6,7

collect
235:25

collected
118:6
218:16

collecting
236:9

collection
222:15

collects
124:22
125:11
203:18
219:16

column
27:24
28:5,14
36:20
37:6
165:7,10
252:24
253:7,8,19 258:17

combination
66:15
118:8
126:25
127:7
165:16
169:10
170:15,18
172:5
173:10,12
177:25
182:4
185:8
193:20
196:20
197:20
212:21
244:21
256:9
257:7
276:2,4

combine
159:17
169:16
173:9,25
174:11
175:2,15
176:11
177:11
199:4
208:24

243:13

combined
66:16
136:2

command
38:22,23
39:3,4,5
63:11

commands
63:7

comment
114:8
115:9
116:6
148:11,
12,13,15,
17 152:13

commenting
253:9

comments
112:25
113:23
114:2,3,
5,20
115:20
116:21
149:11,20
150:6,12,
16 161:8,
17,21
162:2

commercial
121:14

common
21:16
62:17
63:18
159:2
204:12

commonality
227:23

commonly
153:21
158:2,25

communicate
70:7
119:7,18,
22 125:8
155:6
157:5
159:11
179:15
192:9

communicating
40:23
41:3
66:10
67:19
73:20
125:16
167:5

communication
26:5,15
41:17
229:22

communications
23:20
135:10

company
132:22

comparable
247:10
251:10

compare
97:3
272:13

complementary
215:9

complemented
198:2

complete
47:8
139:21
196:19
211:4

completely
47:14
179:5
199:25

completes
178:20
186:12
231:19

complex
97:5
178:17

complexity
97:2

complied
14:8

complies
81:23

compliment
198:24
199:2

comply
82:13

components
199:6

comprises
28:21
42:16,18
254:24
256:24
276:15

computer
35:11,16
38:22
39:3,4,5
41:3
99:12
101:2
125:7
126:10,12
127:24
128:4,6
154:21,23
155:11,
12,15,17
193:5
219:7
226:10
227:7,12
229:9
233:9
235:4,7,
11,12
237:6
238:20
240:3,9
256:21
258:9,11
261:14,
16,18,21

con
256:12

concentrate
103:18

concept
22:22
254:18

concerned
146:9

conclude
170:20

conclusion
38:17,18
174:2

conditions
240:24
271:4

confer
59:16

conferring
57:23

confident
262:13

configured
169:18
176:3
256:8,21
258:6
259:23
275:2
277:2,7

confirm
126:7
160:17
172:12
242:17

confirms
242:13

conflate
77:15

conflating
24:16,17,
22 25:9
77:9

conflation
78:3

confused
115:5

conjecture
91:10

conjunction
22:10
110:2,22

connection
30:18

connects
229:2

connotation
81:2

considerations
200:14

considered
200:18
224:9
233:6

consistent
30:9
161:25
235:21

consisting
256:25

consolidated
6:9

constituent
71:20

construct
84:10

constructing
84:6

construction
41:9
81:20
82:2,22
83:15,17,
21 241:5

construing
101:3

consulting
15:5,9
16:9,25
85:4,20

content
61:16
110:6
135:16,19
142:9,13
144:9
146:21
147:3,6,7
149:15,16
196:10,18
200:11

context
6:19
23:14,17
24:9 25:6
26:25
30:25
31:10
32:6,10,
20,22
33:2,18,
25 34:5
36:7,12,
17 37:13,
16 38:14
43:11,19,
20,22,24
44:13
47:6
48:25
50:3
51:3,4
61:20,24
63:21
65:24
68:16
70:24
75:23
77:5
78:23
79:3
80:14,15
83:6,7
109:3
127:8
137:20
140:15
155:11
157:13
165:18
173:2
175:21
194:6,13
233:16,18
234:10
239:5
265:2,3
268:14

continuation
18:2
135:14
250:25
251:18,24

continue
19:8 58:5
59:18
120:16
172:3,13
173:8
192:19
211:3,23
220:23
224:7
251:3

continues
35:10
209:15
255:3
257:21

continuing
134:13
252:9
257:13

continuous
125:2

continuously
16:17,18

contrary
129:11

contrast
41:18
42:2 56:8
172:10
173:18
176:12
237:5

control
271:3

convenience
62:5

conversation
28:19,21
30:7,21
32:3,13,
19,22,25
33:2,5,6,
9,13,14,
16,17,19,
21,23
34:6,7,22
35:3,15,
20,21,24
36:4,20,
21 37:5,
6,12,14,
18,24,25
38:4,6,7,
14,16,20
39:8
40:18
41:15
42:7,10,
15,17
43:5,8,
11,15
44:8,13,
18 45:16,
21 46:3,
7,11,22,
23,25
47:4,7,8,
11,13,21,
22,24
48:4,6,7,
12,18,21
49:3,12,
17,18,19,
23,25
50:5,9,
11,15,24,
25 51:5,
19,20,21
52:4,9,
14,25
53:4,16,
18,22,25
54:3,8,
12,14,17,
19 55:21
56:7
61:16
63:25
64:18,19,
23 65:2,
3,7,10,16
66:25
67:12,25
68:3,11
71:8,12,
14,16,20,
22 72:2,9
73:8
75:4,20
77:4,10,
11 78:24
79:8,9,11
80:5,6
82:15,16
92:11
118:5,6
122:14
129:13
174:4
254:22,24
259:19,22
260:10,13
262:9,21
263:3,8,
21,24
264:5,6,
8,13,16
265:15
266:4,5,
6,9,12,18
267:11
268:8
269:2,5,
18 271:6,

8,24
272:2,3
273:6
274:6
275:9,10,
12,17
276:13,15

conversational
39:21
65:13
118:21
121:9

conversations
36:9
52:16
263:17

converse
38:9 40:3

conversing
38:8
64:15

convey
147:4

conveyance
199:18

conveyed
214:19

copied
69:8
70:12
114:9
228:19

copies
19:24
20:2
109:6
112:11

copy
5:22 6:2,
6 7:13
9:17
69:8,9
74:4,20
112:19
132:14
135:2
195:17
223:23
224:21

copying
70:14
222:7
223:10,
11,23
229:4
244:17

correct
6:10,17,
19 12:7
13:7,15
14:2 15:6
16:7,11
18:16
21:3
25:2,3
29:9,18
31:20
32:5,16,
19 34:24
35:3,17
41:12
42:3,10,
17 44:11
51:22
52:12
55:8,21
56:12
61:4
72:5,12
80:16,17
84:22,25
85:2,6,
10,21
106:19
113:18
115:22
126:13
129:17
132:17
135:23
138:19,22
139:22
141:20
142:10,15
144:5
145:7
146:2,10
161:22
164:19
167:13
168:9
169:7
173:16
182:15
184:5
191:7
197:17
198:18
205:18
207:10
214:3
218:11
220:6
230:11
235:19
244:8
257:16
265:19
267:7
268:9
272:18

corrected
13:22

correction
8:5

corrections
8:15,23

correctly
67:23
149:8
216:23
219:23,24
265:21

correspond
148:9

correspondence
23:20

corresponds
266:15

counsel
5:22 6:13
7:9,16
8:7,14
9:2 54:20
57:15,18
58:22
59:16
71:2
95:24
102:23
105:10
108:21
113:12,17
114:13
120:22
132:6
134:25
135:9
144:21
164:21
171:24
182:7
188:7,16
189:10,15
190:5
216:15
217:9
242:2
270:8
272:4

counsel's
96:2

country
98:20

couple
90:12
97:24

court
66:18
67:9,15,
20 68:6,
20,22
69:4
72:20

cover
40:7

covered
272:17

covering
94:6
200:2

create
49:17,19
50:8
119:10
158:11
264:13

created
42:4
50:24
64:13
69:7
153:9
214:9
235:20

creates
49:18

creating
40:2
171:16
269:4

credentials
18:11,12

critical
24:13

Cronos
184:5,7
213:4
215:25
217:14
222:3,25
226:8,14,
21,24,25
228:7,10
229:16,19
230:9,13
233:5

cross-reference
244:19

cross-referencing
243:18
244:5

crystal
182:11
208:13

cut
213:21

D

data
38:24
74:5,20
122:21
233:8
235:19
256:25

date
4:22 5:8,
17 7:7
9:12
10:21
11:6,15
86:8
97:25
108:18
113:16
114:12,24
116:10
134:3
136:24
138:9
195:13
204:8
220:9

dated
7:5 9:10
84:20
109:14,24
245:6

dates
162:16

day
9:19
122:21
275:16

days
6:21
104:10
247:19

de
38:6

deal
93:20

dealing
19:9,12
93:19
187:20

dec
126:8
149:25

decade
39:25

December
116:7,15

deciding
205:23,25
206:2,19
207:17

decision
81:3
245:17
247:17,25
248:18

decisions
245:2,23
246:11

deck
170:12,15
197:16

declaration
10:15,19,
23 11:4,
9,13 12:3
13:15
14:23
17:24,25
18:3,13
84:20
90:2,8
91:18
95:25
100:17,21
102:2
107:8,15,
19,24
108:10
109:3,8,
11,19,20,
23
110:11,22
117:6
133:20
134:16
135:12,
14,22
136:5,10,
17 137:7
138:16
139:5,6,
11,21
140:9
141:3,19
142:17
149:24
163:9,13,
25 166:20
168:8
169:7
170:20,24
174:24
175:22
177:18
178:7
181:18
185:21
191:14,16
198:8
200:5,6
201:9
207:22
208:3
242:14,18
243:3
247:16,
18,21

declarations
10:8,12
89:15
91:5 93:6
94:9,10
95:18,21
97:7
101:21
107:3,11
137:24
138:2,20
146:3,4,
19 149:22
160:10,
18,21,24
163:5

declare
142:25
212:5

define
22:12
24:5,13
262:8,21
263:2,7,
18,21,24
264:13,16
265:14
266:4,17
267:10,
16,17
268:7
269:18
270:25
271:6
272:3

defined
29:16
38:14,19
46:23
68:15
271:12

defines
128:24

defining
37:13
259:17,19
264:5
265:17
266:9,11,
13

definition
128:19,25
129:25
131:15,16
133:13
154:8
155:13
271:16,21
272:16

definitions
264:8

definitive
191:9

demonstration
69:7,19,

22 70:21

dep
153:23

depending
37:16
43:18
47:5
220:18

depends
156:24
157:2

deposed
6:18,21
90:15
247:18,20

deposition
4:16,20,
25 5:6,
11,15 6:9
7:2,4,20
9:7,9,19,
21 12:10,
23 13:18
15:11,14
16:16,21,
23 17:2
19:25
56:22,23
57:4
89:14
97:23
104:10
105:20
107:9,10
149:25
150:3,4
151:18,21
152:2
162:11
189:9
191:21
246:5

describe
130:13
151:7
157:25
183:2

describes
198:22
199:3,23

describing
127:6

description
246:25
249:10
250:23
251:13,
16,17
257:19
268:16
269:23
270:6

descriptions
152:16
247:12

desires
59:3,12

detail
84:19
118:25
124:18
151:4,6,
16 198:23
199:3,12
200:3
215:4

detailed
120:9

details
91:12
119:24
121:15
126:3,4
127:12
166:21,
23,24
183:20
192:7,17,
25 193:22

determination
204:25
205:15
208:14

determine
76:7
81:9,13
204:5
255:17

determines
171:18

determining
203:22,23
204:23
205:8,11,
23,24
206:2,4,
5,7,18,20
207:15,16
209:3
256:5
257:11
258:3
276:24
277:5

develop
41:25

device
239:13

dialogue
56:2
60:19,23,
24 61:2,
16 74:3,
6,13,19,
22 223:2

dictate
65:6,8,9
66:6

dictating
66:5,7

differ
33:9

difference
37:23
159:10
179:21
180:6
201:16,
19,21
209:9
264:21

differences
200:12,
19,21
201:6
248:12

digital
204:14

digits
12:6

diligence
146:8

diligent
145:13,15

direct
125:21
181:22
186:24
191:21
267:2,4,5

direction
43:18,21
46:19

directions
45:5,13

directly
21:11,22
23:2
124:6
169:18
176:4
219:11
238:19

directory
136:2,3

disagree
150:16
157:23
269:13
270:3

disagreement
204:3

discern
209:5

discerns
206:24
207:7

disclose
17:19
180:12
181:22
186:16
196:14,17
202:18
203:5
268:6
269:16

disclosed
17:24
168:14
174:18
185:24
186:17
197:5,16
215:7

discloses
169:17
175:7
176:2
178:8,10
181:15,
18,25

182:13, 17,24 183:8,18 186:5 187:25 192:16 198:13 201:24 202:3,16, 21,22 203:3,11, 14 204:10 219:18 231:8,17, 18 243:8 244:16 252:4,5, 16 262:7 267:9

disclosing
179:22,24 180:7 181:24 183:16 184:15 187:18 215:12 240:25 243:4

disclosure
176:12 178:25 185:3,22 187:19,20 216:25 218:10 231:3 243:19 244:6 265:8 271:20

discrete
194:14

discuss
8:16 108:25 171:10 172:9 189:18

discussed
108:24 171:4 185:9 203:24 215:4 243:9

discussing
63:16 118:4 183:8 231:7 248:8

discussion
165:24 171:3

display
101:5 228:15 256:22

displayed
221:18 227:3 235:3 256:16 257:2,3 258:8,10 261:11, 13,15 275:4

distinguish
181:10

divulge
17:7

document
4:19 5:5, 14 10:18 11:3,12 70:13 102:22 103:14, 15,16,17, 18,19,21, 22,23 105:13 106:8 108:9 110:3,10 133:15,19 134:24 136:16 138:6 139:19 140:21,22 143:12,24 144:12,19 208:22 223:2,12, 15,24

documents
11:18 105:23 106:5,6, 9,10 109:6 145:19

dollars
86:13,15 87:11,13 88:10

door
104:15

double-checked
162:14

double-sided
7:13

doubt
161:7

draft
95:20 145:25

drafted
95:21

draw
34:15

drawing
25:15,23

drilling
93:11 94:2

driving
49:24

due
146:8 159:7 201:23

duly
4:4

E

e.g.
269:9

ear
69:4

earlier
63:16 134:7 163:16

ears
68:19

easier
164:7

easily
167:24

easy
186:15 194:19

edited
123:18,20 142:12

editing
142:11

editor
264:9,11 265:17

effect
118:23

efficient
177:2

effort
174:5

elaborate
64:4,11, 12

electronic
212:14,16 213:5,15, 20 214:16

element
28:15 29:4,6 42:16 165:25 166:6 167:10,12 169:6 173:23 176:19 180:7,16 181:11,13 183:13,15 185:9 194:15, 16,18 202:23 203:14 208:2 214:23 220:11 221:13 230:25 242:11,18 243:9,14, 18 244:5,

8,13,18, 20 247:2, 3 266:9 275:24

elements
24:4,13 171:5 181:24 183:23 186:5,8 198:14,17 201:14 215:21 220:22 253:16

email
9:2,3 69:8,10, 25 75:15, 18 76:22 171:16 184:5,8 187:5 193:15 214:16 215:13,25 217:14 218:8 219:5 221:16,24 223:3,16 226:21,25 228:8,10 229:16,19 230:9,13 233:5,11 236:12 238:17,18

emailed
224:5

emailing
233:8

embodiments
262:7,25 263:7 265:14 267:9 268:7 269:17

enabled
260:12

encompasses
257:17,18

end
47:8 104:8 149:10 176:17 218:21 256:10,13 257:14 270:8 275:16

ends
172:10

engaged
152:7

English
31:15 38:8 41:16 61:3,9, 12,25 62:14 63:18 67:13 154:14,16 155:8 180:2 211:15

enter
56:4 183:19 192:17

entered
245:12

entering
56:9 192:25 193:21

enters
166:21, 23,24 183:20 192:7

entire
180:4

entities
26:14 158:25

entitled
4:19 5:5, 14 10:18 11:3,12 108:9 133:19 136:16 138:6 195:9

entity
26:6 27:16 50:16,24 157:3 158:12 228:13

equally
169:21 176:6

equations
96:24

equipped
69:4

errata
19:24

error
139:18,20 140:2 141:22 144:11

errors
7:25 8:6, 9 9:23 10:2,4,7 13:22 14:5 142:2,3 246:9,14

established
156:25

establishes
277:9

establishment
39:25

Esteban
114:20

evaluation
208:17

event
17:15

eventually
214:14

evidence
108:2,3, 13,14 127:24 133:23,24 134:18,19 136:12, 13,20,21 214:14

exact
16:12,13 45:2 87:17 90:13 92:3,4 93:14 97:25 98:6 151:6,7 233:17 237:11

exam
103:12

EXAMINATION
4:6

examine
23:25

examples
42:12 46:24 48:3 128:10 210:9,10 231:19 232:21 233:24 262:10,20 271:14

excerpts
44:5

excess
15:19

Excuse
123:9

execute
89:4 220:2 236:2 240:22 260:22 261:16,17

executed
252:20 255:6,25 256:12 257:10,22

executed,'
252:19

executes
234:15

executing
235:18
256:10,15
257:2,4,
15 260:24
261:3

execution
256:17
260:9

exemplary
262:7,25
263:6
267:9
268:6
269:17

exhibit
4:15,19,
24 5:5,
10,14,19,
23 6:3,25
7:2,4,12
9:7,9,13,
16 10:14,
18,23
11:3,8,
12,23,24
12:23
13:2,6,
10,14,19,
25 14:9,
15 18:4,
7,13
19:3,21
20:4,20
21:7
28:15
37:8
60:2,6,7
61:18,21
82:23
83:19
84:14,21,
25 90:11,
21 91:14,
16 92:9
94:13,14
100:9,14
102:10,14
103:24
105:5,19,
25
106:12,13
107:23
108:8,9,
20,22
110:15
111:2,8
112:19,
21,23
113:11,
14,19,21
114:10,
18,19,22
115:12
116:20
117:9,13
124:5,6
128:22,23
132:12,24
133:19
134:16,23
136:9,16,
25 137:6,
14,15,16,
25 138:6,
21 139:8,
9 140:10,
13,19,22
141:2,5,
7,13,21
142:6,14,
19
147:10,
11,12,15,
17 148:8,
9,13,14,
16,18,20
150:6,7
152:14
160:18,21
161:4,5,9
162:9
163:8
165:3,5,7
166:2,3,
11 167:16
168:9
171:9
174:24
181:19
182:13
195:9,16,
19 196:25
197:9
200:8
216:17
217:6,11
220:5
242:12
245:5,11,
16
246:21,25
247:9
248:8,18
250:22
252:14
253:13
259:10

exhibits
7:17
12:14
18:5
106:17,24
107:2
111:3,7,
17 115:4
135:25
136:3
149:2
161:20
162:11,15
216:20
269:14

exist
46:10
122:18
199:6
200:15

expands
199:7

expect
130:4

expenses
85:24
86:3

experience
24:25
25:5 34:3
37:10,22
41:10
43:13
68:5
131:7

experiments
99:5

expert
14:20
17:20
18:24
24:11,12
25:21
57:7,10,
12 105:22

expertise
20:5
31:2,10
68:5
130:18

Experts
15:15

explain
21:12
45:6,13
56:18
175:13
180:11
200:18

explains
170:15
219:25

explanation
253:20

exposed
242:24

expressly
220:13

extended
104:13

extent
55:18
124:15
145:16
197:15
198:4
200:15
201:15,17
204:22

external
217:25

extraordinary
27:5
29:12

eye
130:25

F

face
132:20

Facebook
156:11,
13,17,18
157:9,11

facilitate
71:22,25
72:8

fact
67:3 80:3

118:4
120:3
127:5,22
129:12
142:5,8
145:6
150:22
156:9
158:2
167:19
170:5
173:4
176:25
182:4
183:18
206:4
207:14
210:6
212:10
220:19
221:3
225:21
249:13

facto
38:7

facts
100:16
103:4

fair
40:7
150:8
156:13
208:25
209:8
217:3

falls
77:21
78:8

false
143:5

falsification
147:6

familiar
49:15
135:17

family
251:19

fashion
150:14

faster
220:3,4

features
22:11

feedback
27:22
28:23
29:2
42:21,24
44:2,9,
11,21
45:24
46:14
47:23
51:10,13,
14 53:6,
20 54:25
55:2,5
72:3,10
73:7,16,
24 74:2
75:6,9
77:2
79:13
80:7,19
81:7,10,
13
276:17,21

feel
56:24
59:10
117:7
121:6
159:8
208:10,12
248:9

fictional
51:20
52:11

field
19:16
24:12
38:24
56:5
97:15
127:2

fields
19:16

figure
16:15
85:14
166:22
190:19
223:7
263:10,
11,16
264:3,7,
17,21,22
265:4,12,
13,16
266:15,19
267:4,7,8
268:4,17
269:6,8
272:11,
16,18

figures
91:11
262:10,19
263:6
264:11,25
265:18,24
267:15,
19,22,24
268:3,4,
13,14,20,
21,22
269:9,15,
24,25
270:7

figuring
99:14

filed
108:23

fill
55:24
214:22
220:12
231:9
234:13
238:8

filling
215:20,21
218:14,15
235:19

finalized
111:8

find
7:24 9:3,
23 13:21
110:25
181:13
197:6

finding
191:18

fine
94:21
143:7
241:23

finish
92:23
120:24
121:7
131:11
171:25
176:15
182:9
188:5
190:6
206:16
211:9

finished
219:12

firsthand
129:15

fixed
130:20

flexibility
208:20

flow
262:8,21
263:3,8,
21,24
264:14,16
265:15
266:4,6,
17 267:10
268:8
269:18
271:3,6,
8,25
272:3

flyer
213:20

focus
125:18
137:12
170:12
172:3
175:12
178:21
181:9

focused
23:12

focusing
174:18
211:11

follow
209:18
248:9

forced
16:16

forgotten
155:24

form
17:22
18:15
19:14
20:7,16
21:8
22:6,15
23:10
24:7,15
25:11,17
26:2,24
27:11
29:14
30:12
31:3,21
32:24
33:10
34:19
35:5,22
36:6,23
37:11
38:3 39:9
40:4,19
41:11,21
42:11
43:7,14,
23 44:12,
14,23
45:25
46:15
47:14
48:9
49:14
50:14
51:23
53:21
54:9
55:2,6,7,
9,11,12,
16,19,22,
23 56:5,
10,13
57:16
60:13,16,
20,22
61:19
62:3,5,12
63:2,17
64:2,25
65:4
66:3,11
67:17
68:9,17
69:13
70:5,25
71:9,18
72:6
73:10
74:8,13
75:7,12,
21 76:9
77:7 78:6
79:5,17
80:4,12
81:18,25
82:25
83:22
85:18
87:3
88:6,17
89:17
90:16
91:17,24
92:13
93:21
94:25
95:14
96:10
97:9 98:8
101:8,17
102:19
104:6
105:18
110:16
113:6
116:9
117:4
120:23
122:23
123:19,23
124:14
126:2,20
128:8
129:18
130:2,7,
14 131:25
132:18
133:2,12
142:7
143:14
144:16,25
145:14
146:5,21
148:24
149:6
150:11,21
151:5,12
152:11,22
154:3,11
155:10,21
156:6,23
157:15
158:7
159:6
160:6
161:2,12
163:22
164:13
166:18
168:10
169:8
170:25
172:17
174:20
176:14
177:19
179:3,23
180:17
181:20
182:16
183:11
184:11
186:3
187:13
188:4
193:9
194:5
196:2,15
197:2,10
198:10
199:14
201:8
202:14
205:5,20
207:24
208:4
209:11
210:18,19
211:8
212:15
213:17
214:4,17
215:3,15,
21 216:5,
11 218:12
220:14
222:4
223:5,20
224:23
225:19
226:16
227:16
229:12,18
230:12
231:10
232:3,16
233:13
234:9,18
235:23
236:13
237:14
239:3
240:8
241:20
246:12,18
249:5
250:7
253:4
254:6,16
261:4
262:23
263:9
264:23
265:11,23
266:25
267:12
268:10
271:23
272:19
273:10
274:11
275:25

formed
30:2,5
225:23,
24,25

forward
245:2

found
208:7
256:4

fourth
179:4

frankly
93:15

free
56:24
59:11
117:7
121:6
248:9

front
16:23
52:20,22
57:11
94:19
132:14
149:17
160:10
162:12,21
207:12
218:21

full
17:25
72:17,19
110:10

fully
14:7

function
63:13

122:20
125:5

functionality
101:4
234:15
235:18
236:11
256:16
257:3
261:18

G

gain
177:13

gap
214:21
219:10
220:13
231:9
238:8

gather
126:18

gathered
129:23

gathering
234:23

gathers
126:10
127:25
128:5
234:12

gave
7:12
15:23
72:15
75:19
76:6,19
78:17,19
91:3
110:23
161:14
171:14
184:17
186:9
222:6
253:11
264:25

general
88:4

generally
151:8,11
158:17
248:21
249:3
250:15
251:7

generate
64:16
73:6
75:15
76:22
102:8
118:17
125:13
212:13
213:4
214:16
221:24

generated
51:19
52:10
70:22
102:7
118:19
120:6
226:8,9,
22 227:9,
12 228:6

generates
64:20
118:10
124:21,24

generating
72:2,9
73:7
221:16
226:14,18
236:11

generation
213:15,19

generative
64:25
65:5,6

generatively
66:14

generator
184:5,8
187:5
215:14,25
217:14
218:8
219:5
226:21,25
228:8,10
229:16,19
230:9,13
233:6,11
238:18
239:18

gibberish
65:21,22

gist
250:5

give
12:14
16:15
26:25
42:12
51:17
57:2 61:6
66:18,20
87:14
90:22
91:15
92:18
93:22
112:11
117:19
122:21
152:16
160:11
165:21
190:11
191:21
210:9,10
216:19,20
245:10
253:12
258:17

giving
76:3
91:11
93:10,12
94:4 95:6
147:14
189:6
190:8
191:19
251:19

glancing
112:8

good
4:8,9
49:8 79:8
205:14
212:2
250:3
277:14

got--
259:6

grammar
40:14,24,
25 67:13
71:8,11,
12,15,21,
22 73:9,
11,19

granting
245:7,17

graphical
169:22
176:7
221:17
222:12,
13,14,20
227:22
228:4
252:21
257:23
261:19

graphics
227:24

great
20:14

group
256:24,25

guess
78:11
151:7

GUI
183:23
221:17,
19,21,25
222:5,10,
11,18
223:4,9,
11,13,17
224:2,10,
18 225:8
227:21,22
228:4,6
235:3
238:19
239:17
241:13
243:9
244:18,20
252:22

H

half
86:15
189:7
190:17

handing
12:21

handle
195:5
206:25
207:9,18
209:7
210:7,16
212:10
242:6

handling
145:22
209:23

hang
256:3

happen
62:17
145:17,21
147:2

happened
47:15
225:15

happening
119:2
124:18
225:21

happy
57:19
64:7,12
160:11
172:2
182:10
216:19

hard
21:24
77:16
96:3
98:18
119:3
191:4

head
99:9

heading
252:15

hear
67:23
68:12

heard
104:17
130:6,12,
18 131:5,
8 155:20,
22 156:4,
7,11

heart
59:3,12

helps
200:2

Hey
23:18

hide
47:13

history
251:20

hold
98:5

Homayoon
4:2,12,
17,20
5:2,6,11,
15 7:3,5
9:10
10:15,19,
24 11:4,
9,13
163:10

honestly
134:9

hope
71:23
277:14

hour
58:11,13,
19,21
189:7
190:17

hours
90:20,23,
24,25
91:13,15,
21,22,25
92:8,24
93:8 94:8
95:7,12
96:5,6,21
99:21
103:20
145:24
146:6
248:14

human
38:9 41:7
65:7
68:18
69:24
204:12

humans
41:17,25
204:13

hypothetical
38:15,18
74:9,12
75:22
76:5
123:4
157:16
239:14,15

hypotheticals
128:12

I

IBM
128:18,23
132:13,
15,20,21,
25 133:9,
10,13

idea
17:14
99:23
100:4
151:8,10,
13 207:25

identical
248:11
262:15

identification
4:21 5:7,
16 7:6
9:11
10:20
11:5,14
108:17
113:15
114:11,23
134:3
136:24
138:9
195:12

identified
18:12
20:25
22:20
24:23
33:12
57:14
82:16
104:25
116:22
146:18,20
187:3
201:5
210:12

identify
16:24
20:8 35:8
85:8,12
105:3
111:6
140:19
167:11
174:16
175:2
178:23
201:12,18
209:21
212:18
229:7
231:3,25
243:18
244:5

identifying
105:7
183:16
223:17

identity
189:24

image
243:22

immaterial
120:2,10,
15 121:15
125:4
126:4
155:2

impact
81:16
158:5
159:3

impacts
8:18

implement
120:11
177:10
184:21
204:6
212:13
214:25
220:20
241:15

implementation
128:14
171:19

implemented
120:14,19
259:19

implementing
175:7
185:11
228:2

implies
52:20
53:3

importance
210:3,5

important
36:8
119:25
125:14
154:2
160:13
174:3,6
212:7
218:3,4,5
230:6
257:6

impossible
122:24

imprisonment
143:7

IMS
15:15,20
17:12

in-house
169:3

include
46:11
53:5,18
72:2,9
81:22
128:25
129:7
144:2
178:12
207:25
269:10

included
42:9
84:24
99:10
136:4
161:8

includes
65:2
186:7
197:13
222:6
266:8

including
12:18
45:21
62:18
99:7
145:19,20
169:22,25
176:8
186:5
228:13

income
88:7 89:3

incorrect
141:18

incremental
18:18
19:5

incur
85:24
86:3

individual
154:18

individually
93:24

individuals
150:17
157:5

inference
25:16,24

information
14:10,15,18,23,24
18:2,6,20
27:16
31:19,23
41:3
44:14
56:10
71:4
76:3,4
81:14
117:24
118:5,12,14,16
119:9
120:4,10,16
121:11,22,24
122:3,8
124:23
125:8,12,24 126:5,11,19
127:11,12,13,17,25 128:5,14 129:23
143:3,19
145:23
146:2
148:21
149:3
199:16,20
203:18
208:19
218:14,15
219:17
222:8
223:24
224:4
226:3
234:12,24
235:2,25
236:9,10
240:22
253:18,19
269:11

informed
101:23
102:23

infringe
237:13,15

inherently
53:13

initials
220:7,8

input
26:19
27:21
28:9,18,22,24,25
30:6,14,15,20,24
31:8
32:2,8,12,15,18
38:24
42:19,21,23 43:25
44:3,8,10,16,17,20,22
45:15,22,23 46:6,12,13
47:2
52:24
53:5,7,15
54:25
55:25
60:18
67:10
72:4,11
73:23
74:2 75:6
76:24
78:19
79:2,12,13,16
80:8,11,20,22
81:8,11,15 252:18
254:10,14,21,25
259:14,23
276:6,9,10,16,17,20,25
277:6

inputs
256:7
257:13
274:24

inputting
53:18
256:25

inside
60:21
61:16
192:10

Instagram
155:20,22,23,25
156:8,16,18,20
157:9,12

instituted
86:10

institution
245:2,23
247:17,24
248:17

institutional
245:7
instruction
203:19
instructions
40:23
66:20
171:18
203:15
insufficient
76:6
integral
21:10,14
integration
157:11
intelligence
195:10
intent
25:16,19,24 204:13
206:24
207:8
209:6
intentional
146:11,14
intentionally
16:2
Inter
10:24
11:9
108:3,14
133:24
134:19
136:13,21
interact
184:16
221:21
227:21
260:12
273:4,18
274:4
275:21
interacting
25:25
65:19
228:3
230:17
interaction
224:17
225:8
256:23
258:10
271:10
274:25
interactions
224:11
256:23
258:8
261:15
275:3
277:8
interacts
221:18
275:6
interest
210:24
212:8
interested
120:8
interface
21:16
22:2,13
23:8,24
24:6,14,18,20
25:8,12,13,23,25
26:4,8,16,19,20,23 27:4,7,8,10,15,17,18
28:7,8,17,20,24
29:8,23,25 30:8,11,14,16,17,20,22,23,25
31:7,9,12,14,15,17,18,22
32:2,4,7,11,15,23
33:3
34:2,8
35:14
38:21
40:16,17
42:5,8,22
43:12,16
44:19
45:15,17
46:4,6,8,16,23
47:17
49:11,12,24 51:16,22,25
52:6,12,23 53:2,8,14,17
55:7,19
56:6 62:2
63:22
65:19
66:24
67:9,14,19,21
68:6,15,18,19,25
69:3,12
70:3,6,7,10,15,22
74:7,23
75:2
76:8,10,13,16,20
77:9,12
78:18
79:14
80:9,23
81:12,23
101:5
169:18
176:4,7
203:16
204:12
215:19
218:3,17,25 220:21
221:17
222:12,13,14,20
223:22
226:3
227:22,24
228:4,21
230:2,15,18 232:24
235:3
239:20
248:20
249:14,22
252:6,17,22
254:13,20,23
256:16,21
257:2,3,23 258:8,10,22
259:14,20,21
260:11,13,16,17
261:12,14,16,20,21 275:4,23
276:14,19
interfaces
21:6,9,23
22:4,23
23:14,19
169:20,22
176:5
248:22
250:16
251:8
interfacing
170:3
182:17
interject
192:2
intermediary
228:22
intermediate
236:24
internals
126:9,17
129:19
internet
216:3
217:3,16
218:8
interparties
245:8
interparty
245:17
interplay
170:6
interpret
197:23
interpreting
37:9
interprocess
127:9
interrupt

204:16

interrupting
188:8,14, 15

introduction
14:22

invention
175:15
234:23
235:22

investment
173:3
177:5

investments
89:5

invoice
213:16

invoices
86:12,24
90:4,5

invoked
101:4
132:13,24
133:7
260:15
271:7

invoking
260:24
261:2

involve
34:9

involved
15:15
33:20,22
34:14,22
48:5 50:6
99:15
159:2

involves
34:11,23
234:23

involving
22:24
35:25
271:21

IPA
153:14

IPR
13:15
18:14
20:4,21
81:17
86:9
112:20
113:18
134:23
135:21
136:6
138:21
140:9,18
141:8
160:24
170:19
174:25
180:4
233:7
245:8,13, 17

IPR2023-001368
107:23

IPR2023-01368
4:17
10:16
12:7
14:16
19:3
20:21
21:7
36:18
107:4,12

IPR2023-01379
5:2 10:25
134:22
147:11

IPR2023-1379
137:8

IPR2024-00065
5:12
11:10
113:13,20
114:19
136:15
141:3
163:10

IPR2024-00165
112:20

IPRS
6:10,15, 19 18:21, 25 21:3
23:15
86:9
115:13
135:20
147:13
150:8
152:6
160:22

irrespective
75:5
80:10

issue
205:13
238:21
239:21

item
135:18
201:10

items
129:3

Ivan
107:24
108:10
133:20
134:17
136:10,17

J

job
27:15
145:13,15

July
109:14,17

jumping
221:8

June
7:3,5
9:8,10
12:23
90:6,8
138:8

just-
260:4

K

key
22:11

keyboard
222:16

keywords
40:24
41:2
63:10
65:9
66:15
131:19,25
132:5

kind
52:13
93:25
160:13

kindly
66:19
165:22

knew
215:6

knowing
126:9

knowledge
100:16,22
101:6,16, 20,25
102:6
103:4,7
124:12
129:16
139:23,24
140:3
141:21
143:2,5, 16,17,22
144:2
145:16
246:13

L

label
60:12

LAN
49:15

language
19:13,15, 17,19
20:6,22, 24 21:6, 9,10,15, 16,17,23, 25 22:4, 5,12,14,

16,22,24
23:7,8,
14,19,24
24:5,11,
14,17,18,
20,21
25:2,7,8,
12,14,22
26:3,6,9,
16,17,22
27:4,9,
19,21,22
28:17,19,
20,21,22,
23,24,25
29:2,7,
22,25
30:7,8,
11,14,16,
17,19,21,
22,23,25
31:7,9,
12,13,22,
25 32:3,
4,7,10,
12,19,21,
23,25
33:3,4,6,
8,13,14,
19,20,22
34:2,6,8,
22 35:14,
15,19,25
36:3,10,
13,19,25
37:5,17,
24 38:6,
8,16
39:6,7,
11,14,18,
21,22
40:4,6,
10,12,13,
16,17,18,
20,21,22,
25 41:5,
6,13,14,
17,18,23,
24 42:3,
7,8,10,
15,19,20,
21,22,23,
25 43:2,
3,5,10,
12,15,16,
17,25
44:2,3,5,
8,9,10,
11,15,16,
18,19,20,
21 45:10,
14,16,17,
22,23
46:6,7,8,
12,13,14,
16,18
47:2,16,
17,20,24,
25 48:4,5
49:11,16,
19,23
50:9,18,
19,20
51:5,6,
10,13,14,
16,22,25
52:2,12,
23,25
53:2,4,5,
6,7,8,14,
16,17
54:8,11,
13,14,18,
19,24,25
55:3,5,7,
21 56:4,
6,7,11
61:3,9,
12,15,25
62:6,7,9,
14,16,18,
24,25
63:4,5,
15,21,22,
24 64:17,
18,19,21,
23 65:7,
11,12,15,
17,20,21,
22 66:2,
8,10,15,
16,17,24,
25 67:2,
5,7,9,12,
14,18,20,
21,22
68:6,15,
24 69:3,
5,12,25
70:2,6,8,
10,22
71:7,10,
11,13,16,
19,21
72:3,4,
10,11
73:7,13,
14,15,24
74:7,14,
23 75:2,
3,8,12,20
76:8,11
77:3
78:24
79:6,7,
10,11,12,
13,14
80:4,7,8,
10,19,22,
23 81:7,
8,10,11,
12,15,22
82:6,7,
10,11,18,
20 83:5,
10,12
84:3
98:14
128:20
129:5,7
130:5
131:23,24
132:2,4
154:15,16
203:16
211:20,
22,24
251:10
252:6,17
254:2,10,
13,17,20,
21,22,24,
25 256:6
257:12
258:22
259:13,
20,21
260:11,
12,15,17,
25 273:4,
19 274:5,
20,21,24
275:7,21,
23 276:5,
11,12,13,
15,16,17,
18,19,20,
21,23,25
277:4,6,
10

languages
41:7,15,
24 62:18,
19,20

large
49:16
145:22

launched
273:3,18,
25 274:3

lawsuit
149:22

layer
236:24

learning
192:10

leave
12:25

leaves
224:24

legally
85:15
180:2,3
241:2

letterhead
212:14,16
213:5

level
118:7
200:13

libraries
170:7

library
154:25
155:3,4

life
50:21

light
22:19
83:23,24
84:9,11
127:7

limit
242:8

limitation
46:3,17
205:11

limited
41:16

lines
38:23
39:3
273:24

link
112:15

167:22
179:18

list
105:14, 17,23
107:2
111:2,5
135:24

listed
18:4
106:11,17
111:7
169:12
197:14

Listen
188:16

listening
208:18

listing
139:12

lists
42:16

literally
72:19

live
4:12

LLM
51:19
52:10

local
216:7
217:19,24
218:25
226:9
239:13
240:6

locally
192:21
216:3
217:2,17, 22 218:9, 19,24
219:6
227:18
237:12
239:17

location
192:14
218:17,19

long
31:6
54:12
57:22
73:12
79:6
98:16
158:8

longer
91:18
198:8

looked
82:5
88:5,7,20
93:19
103:23
106:6
114:25
135:13,15
137:25
138:12
139:7
140:9
142:9,14
150:5
160:17,20
161:4
162:5,16, 17 263:14

lost
31:5
239:25
273:21

lot
18:2 25:5
96:4,7,23
97:15
100:3
104:12
115:6
125:20
135:25
146:25
257:18
263:12

loud
28:13

louder
67:24

M

MACEDO
4:7,14,23
5:9 6:13, 24 7:11, 16 8:14, 18 9:6
10:13,22
11:7
54:22
57:18
58:3,8, 14,16,18, 22,24
59:22
72:25
73:4
112:18
113:10,17
114:15
121:2,5
125:19
132:10
133:16
134:4
135:3
164:24
188:6,11, 16,21,25
189:6,10, 15,17,22, 25 190:5, 25 193:4
194:10
195:7,14
216:18
217:8
272:4
277:12

machine
34:11,14, 17,23
40:4,24
45:11
47:6
51:5,8,15
53:19,23
54:2,6,10
64:15
68:22,23

made
51:9
88:15,21, 22 89:9
108:23
142:10, 15,25
143:3,5, 6,16,18
144:10
149:11
157:18
196:16

main
229:20

maintenance
19:5

make
38:17
46:21
65:12
67:5
68:14
73:25
80:25
81:2,3
87:7
88:3,10, 12,23
105:13, 17,23
134:12
135:8
143:20,21
144:4
145:11,25
146:9
147:5
159:9
164:7
182:11
194:19,23
197:24
198:8,11
205:10
208:17
216:22
225:10
233:11
237:13,15
250:11
271:3
272:8

makes
65:20
155:5
168:4,22
181:23
182:18,19
186:7,11
199:8
208:14,20
232:25
239:23
266:23

making
65:25
74:9,11
79:18
144:8
243:21

managed
153:17

management
155:2

manipulates
252:21
257:23

manner
122:20
126:11,19
128:2,6
137:2
210:22
252:21,23
257:22,
24,25

manual
220:2

March
245:6,12

mark
4:15,23
5:9 6:25
9:6
10:11,14,
22 11:8
15:22
112:18
113:7,19
114:17
220:6

marked
4:21 5:7,
16 7:6,18
9:11
10:20
11:5,14
12:15,22
13:10
18:13
28:15
37:7 93:6
108:17
112:23
113:15
114:11,23
115:2
134:2,15,
23 136:9,
23 138:3,
8,20
139:8
140:22
141:21
147:10,11
148:10
160:11,
18,21,22
161:5
163:6,8
165:3
166:2
168:9
174:24
181:19
195:12,16
196:25
197:9
216:21
217:7
245:3,5,
12,16,23

marking
108:7
113:10

markup
15:16
17:11,16

matches
251:2

material
121:18
125:23
151:2
225:16

materials
104:25
105:4,14

math
94:24
95:13

mathematical
96:24
97:16

matter
18:20
26:12
46:19
75:13,16
76:20,24
78:18,25
79:23
154:6
216:24

matters
216:12

meaning
37:4
38:12
50:21
51:15
101:2

meanings
55:13
77:15

means
24:20
29:4 38:9
48:16
58:21
123:13
127:15
154:17
158:3
170:3
192:17
195:25
196:3,10
204:2
205:24
206:18
222:17
269:10

meant
113:12
162:6
217:18
246:17
261:17
265:3
273:11

meantime
160:16

mechanism
31:14
119:11,24
120:7
125:7
168:16
228:22

medium
30:17
31:24
52:2
113:22
114:21
116:23
148:22
149:4
150:10,
12,18
161:21

medium.com
112:24

medium.org
113:15
114:11,23

meet
115:14
138:7
147:23
150:18
161:22

meeting
147:20

meets
82:23
83:19
114:6
185:22
187:11
202:5

memory
107:20
149:9

mentioned
15:13

messaging
157:12
158:4,23,
24 160:5
164:5

messenger
154:5,6
156:18
157:11
163:20

met
45:20
53:13
232:11

Meta
156:3,4,
7,9,14,17
157:10

method
64:14
232:5

Microsoft
69:17,18,
20 70:13,
20 74:4,
20
193:12,14
222:7
223:24
224:9,12

middle
258:2
261:9

million
86:13,15
88:10

mimics
73:15

mind
28:2
72:18,21
94:4
112:13
141:10
242:7
266:24
270:21

mine
125:21
139:16

minutes
59:5
188:20
242:8
270:9
272:7

mischaracterization
82:8

mischaracterized
56:16
57:7,15

miscommunication
239:10

missed
139:2

missing
61:22
196:22
197:7
198:17
211:14
251:14

mistake
139:13,14
140:4,5
141:16
143:23
145:9,10,12 146:10
147:7

mistaken
8:12
146:24
229:4

mistakes
7:24 8:6
13:21
143:21
144:9
145:17,18,21
146:19
147:2
246:9

misunderstanding
239:4,7

misunderstood
250:14

modal
226:7

model
49:16

modification
207:4
238:7

modifications
209:22
210:13

modified
177:16
180:15
183:9
185:24
214:15

modify
181:12
198:16
204:20
207:6
209:5
210:16
213:3,10,14

modifying
187:8

module
154:25
157:22
158:14

modules
159:10

moment
76:14
211:11,15,16,19
224:16

money
16:3 86:7
88:3

monologue
48:18,20
49:2,10
50:17

month
89:20

months
90:12
97:24

morning
4:8,9
134:12
277:13

motivated
175:15
184:19
198:7
206:23

motivating
176:25

motivation
169:16
170:18
174:10,17
175:2,12,13 176:11
177:5,11
184:17

motivations
212:5

mouse
222:16
225:22

mouth
225:10

move
121:6
230:22
241:23
243:5
270:13,22

moving
121:5
203:3
225:22
240:6
259:2

multiple
83:25
172:10
205:17
206:25
207:9
209:7,24
210:4,7,16 212:2,11 271:8

N

narrow
44:25

natural
19:13,15,17,19
20:5,22,24 21:6,9,10,15,17,23,25
22:3,4,12,14,16,22,23
23:7,8,13,19,23
24:5,10,14,17,18,19,20,25
25:7,8,12,13,22
26:3,6,8,15,16,22
27:4,9,19,21
28:17,18,19,21,22,23,24,25
29:2,7,22,25
30:7,8,11,14,15,16,19,21,22,23,25
31:7,9,12,13,22,25 32:3,4,6,10,12,18,21,23,25
33:3,4,6,

8,13,14,
18,20,22,
25 34:6,
8,22
35:14,15,
19,25
36:3,10,
13,19,24
37:5,17,
24 38:6,
16 39:7
40:4,12,
17,18
41:4,6,
13,24
42:6,7,
10,15,19,
20,21,22,
23,24,25
43:2,5,
10,12,15,
16,25
44:2,3,5,
7,9,10,
11,15,16,
18,20,21
45:10,14,
16,17,21,
23 46:5,
7,8,11,
13,14,16
47:2,16,
19,23,25
48:4,5
49:11,19,
23 50:9,
19,20
51:5,6,
10,12,14,
16,22,25
52:2,12,
23,24,25
53:4,5,6,
7,8,14,
15,16
54:7,10,
11,13,14,
18,24,25
55:3,4,7,
20 56:4,
5,6,10
61:15,25
62:6,7,8,
14,16,18,
25 63:3,
22,24
64:17,18,
19,22
65:16,20,
22 66:2,
8,10,15,
17,23,24,
25 67:5,
8,12,14,
18,20,21,
22 68:6,
14,24
69:3,12
70:2,6,8,
10,22
71:7,10,
11,13,16,
19,21
72:3,10
73:6,15,
24 74:7,
13,23,25
75:3,8,
12,20
76:2,7,11
77:3
78:24
79:6,7,
10,11,12,
13,14
80:4,7,8,
10,18,19,
22,23
81:7,8,
10,11,12,
15,22
82:5,6,9,
10,18,19
83:5,9,11
84:3
98:14
128:20
129:5,7
130:4
131:23
132:2,4
168:23
203:15
252:6,17
254:10,
13,20,21,
22,23,24
256:6
257:12
258:22
259:13,
20,21
260:11,
12,15,17
273:4,19
274:4,23
275:7,21,
23 276:5,
10,12,13,
14,15,16,
17,18,20,
21,23,25
277:3,6,9

naturally
41:25

nature
206:24
207:8
209:6

NDA
16:5,11,
13 17:6

necessarily
22:4
73:18
131:15
267:3,24
268:25

needed
81:12
151:13
208:12
214:25

negates
129:12

negations
8:13

Negi
115:21
116:22
150:24

Neha
115:21
116:22
150:24

NGUYEN
6:17 7:9,
15 8:16,
21 17:22
18:15
19:14
20:7,16
21:8
22:6,15
23:10
24:7,15
25:11,17
26:2,24
27:11
29:14
30:12
31:3,11,
21 32:24
33:10,24
34:4,19
35:5,22
36:6,23
37:11
38:3 39:9
40:19
41:11,21
42:11
43:7,14,
23 44:12,
23 45:9,
25 46:15
48:9,14
49:14
50:14
51:23
53:21
54:9,20
55:22
56:3,13
57:16,25
58:5,12,
15,17,20,
23 60:16,
22 61:19
62:12
63:2,17
64:2 65:4
66:3,11
67:17
68:9,17
69:13
70:5,25
71:9,18
72:6,16
73:10
74:8,24
75:7,10,
21 76:9
77:7 78:6
79:5,17
80:12
81:18,25
82:25
83:22
85:18
87:3
88:6,17,
25 89:17
90:16
91:17,24
92:13
93:21
94:25
95:14

96:10
97:9 98:8
101:8,17
102:19
104:6
105:18
108:21
110:16
113:6,12
114:13
116:9
117:4
120:22
121:4,6
122:23
123:12,
19,23
124:14
125:17
126:2,20
128:8
129:18
130:2,7,
14 132:6,
18 133:2,
12 134:25
135:7
142:7
143:14
144:16,25
145:14
146:5
148:24
149:6
150:11,21
151:5,12
152:11,22
154:3,11
155:10,21
156:6,21,
23 157:15
158:7
159:6
160:6
161:2
163:22
164:13,21
166:18
167:14
168:10
169:8
170:25
171:24
172:17
174:20
176:14
177:19
179:3,23
180:17
181:20
182:7,16
183:11
184:11
186:3
187:13
188:4,8,
13,19,23
189:5,8,
11,16,20,
23 190:3,
22 193:9
194:5,7
196:2,15
197:2,10
198:10,20
199:14
201:8
202:14
205:5,20
207:24
208:4
209:11
210:18
211:8
212:15
213:17
214:4,17
215:3,15,
17 216:5,
11,15
217:5,10
218:12
220:14
222:4
223:5,18,
20 224:23
225:19
226:16
227:16
229:12,18
230:12
231:10
232:3,16
233:13
234:9,18
235:23
236:13
237:14
239:3
240:8
241:20,25
246:12,18
249:5
250:7
253:4
254:6,16
261:4
262:23
263:9
264:23
265:11,
20,23
266:25
267:12
268:10
269:19
271:23
272:9,19
273:10
274:11,15
275:25

night's
277:14

NLP
27:6,12
30:10
31:2,10
33:12
34:3
37:10,22
41:10
43:13
67:8 68:5
70:4,23
71:17
77:5 79:3
97:18
131:7,20,
22,23
132:16
155:9,12
276:6

NLPS
29:13,15,
18,21
154:10

nonexistent
141:17

nonprogram
262:20

nonprogramm
er
262:8
263:2,7,
23 265:14
266:17
267:10,
16,17,25
268:7
269:4,5,
17
270:18,19

normal
33:16

north
87:19

note
10:7

noted
277:17

notice
4:16,20,
25 5:6,
10,15
106:16,22
250:20

notices
6:9

number
4:18 5:4,
13 10:17,
25 11:2,
10,11
12:4,7,24
18:14
92:3,4
93:14
98:6,12
108:6
112:16
113:18
128:23
134:22
136:14
139:2
141:11
142:14
163:11
209:2
245:6,9,
12,13,18
252:2

numbers
111:13
138:14
141:18,23
162:18
258:18

numeral
106:2,11

O

object
53:21
85:18
105:18

108:22

objection
17:22
18:15
19:14
20:7,16
21:8
22:6,15
23:10
24:7,15
25:11,17
26:2,24
27:11
29:14
30:12
31:3,11,
21 32:24
33:10,24
34:4,19
35:5,22
36:6,23
37:11
38:3 39:9
40:19
41:11,21
42:11
43:7,14,
23 44:12,
23 45:9,
25 46:15
48:9,14
49:14
50:14
51:23
54:9
55:22
56:3,13
57:16
60:16,22
61:19
62:12
63:2,17
64:2 65:4
66:3,11
67:17
68:9,17
69:13
70:5,25
71:9,18
72:6,16
73:10
74:8,24
75:7,10,
21 76:9
77:7 78:6
79:5,17
80:12
81:18,25
82:25
83:22
87:3
88:6,17,
25 89:17
90:16
91:17,24
92:13
93:21
94:25
95:14
96:10
97:9 98:8
101:8,17
102:19
104:6
108:2,13
110:16
113:6
116:9
117:4
120:22
122:23
123:12,
19,23
124:14
126:2,20
128:8
129:18
130:2,7,
14 132:18
133:2,12,
23 134:18
136:12,20
142:7
143:14
144:16,25
145:14
146:5
148:24
149:6
150:11,21
151:5,12
152:11,22
154:3,11
155:10,21
156:6,21
157:15
158:7
159:6
160:6
161:2
163:22
164:13
166:18
167:14
168:10
169:8
170:25
172:17
174:20
176:14
177:19
179:3,23
180:17
181:20
182:16
183:11
184:11
186:3
187:13
188:4
193:9
194:5
196:2,15
197:2,10
198:10,20
199:14
201:8
202:14
205:5,20
207:24
208:4
209:11
210:18
211:8
212:15
213:17
214:4,17
215:3,15,
17 216:5,
11 217:5
218:12
220:14
222:4
223:5,18,
20 224:23
225:19
226:16
227:16
229:12,18
230:12
231:10
232:3,16
233:13
234:9,18
235:23
236:13
237:14
239:3
240:8
241:20
246:12,18
249:5
250:7
253:4
254:6,16
261:4
262:23
263:9
264:23
265:11,
20,23
266:25
267:12
268:10
269:19
271:23
272:19
273:10
274:11,15
275:25

objective
174:7
207:13

obligated
15:21
17:19
85:15

obligation
144:3

obligations
14:8,14

observation
169:2

observatory
123:13

observe
123:16

obtain
31:13
175:16
259:23

obtains
31:19

obvious
167:18
170:21
171:6
176:18
179:22,25
180:8
181:23
182:5,19
185:10
186:11
191:13
194:18
195:21
196:9,11
198:9,11,

15,25
201:7,23
202:3
204:7
209:4,10
210:14,16
212:20
213:6,11
231:4
243:13

obviousness
170:15,17
185:2
186:21
197:20
198:3,5
200:10

offer
173:3
250:21

offered
253:21

offering
84:24
193:16
253:7

office
69:20,21
74:4,20
193:13
214:13
222:7
223:24
224:9,12

offload
168:20

open
66:21
167:19,21
177:22,23
178:3
183:19
192:16
220:20
224:25
233:14,20
239:18
248:6

opened
104:15
233:10

opening
84:19
160:3
163:19
168:18
178:5,10
181:6
184:2,13
186:5
232:23
233:15

opens
166:21,23
192:6

operates
252:23
257:25

operating
186:6
226:9,11,
17,18,19,
20,22
227:4,5,
10,12,14,
17 228:7,
9,15,20,
25

operation
240:19

operations
271:3

opine
23:13

opinion
13:25
22:12
36:22
37:8,21
40:15
64:11
198:19
199:10
268:3

opinions
100:16
103:4
270:24

opposed
266:5

optimize
195:10

order
17:20
27:9
71:15,25
72:8 73:6
96:17
119:10
127:9
143:25
168:24
205:10
224:3
234:19
242:18

ordinary
21:2
24:24
29:17
37:9
155:7
175:14
200:13
213:6

organizatio n
210:5,8

organizatio ns
220:2

original
12:15,22
13:2,3
18:13
57:2 96:2
109:3,8,
10 110:22
136:4
149:21,23
160:9
161:12
163:5,12
165:5
177:18
185:21
200:6
208:3
210:19
217:11
220:5
247:16
253:12

originally
217:7

other's
157:22

outcome
47:19

output
64:25
76:25

overcome
201:7,20

oversight
106:20
145:9
147:8

owned
153:21
156:9,14,
17 157:10
158:3,25

owner
106:17
111:3

owner's
4:16,24
5:10
106:24
109:20,22

ownership
153:25
154:6
155:2
159:8,13

owning
159:9,23

owns
155:23

P

p.m.
277:17

package
135:21

pages
90:25
94:12,13,
14 95:2,
11 96:15,
17,22
98:3,4,
12,15
99:2
100:10
106:11
111:2
146:3

paid
14:21
15:3,5
16:4 17:5
85:4 86:8
89:13,16,
18 99:25

paper
23:6
97:11,12,
14,18
98:3,13,
17,25
99:16
100:8,12,
13 245:6,
12

papers
18:17,19
19:2
20:3,8,
11,19
21:5
96:14

para
221:5

paragraph
14:25
15:4
84:15,17
85:3
100:15,24
102:18
117:12,25
126:8,14
137:11,19
138:25
139:4
140:20
141:6,14,
18,23
166:16,19
168:8
169:15
170:14,
23,24
171:4,21
172:9
173:16
174:15,
19,23
175:5,17,
20,23
176:10,22
183:12
185:9
200:5
201:22,25
204:4
209:13,23
210:15
212:18
214:24
221:16
223:7
231:21,24
243:7,16
244:10
250:24,25
251:2
252:12
253:18
255:19,20
256:13
258:16
260:5
261:25

paragraphs
15:2
117:17
137:14
139:12
141:16
142:16
144:14
145:6,7
169:12,13
170:16
172:11
176:24
183:5,7
184:18
185:7
209:18
231:2,20

parameterized
260:14

parameters
259:25
260:18,19
261:7

parent
47:11

parentheses
66:22,23

part
17:6
19:18
28:18
30:7,20
32:2,12,
14,18
35:9
44:17
45:16
46:7,22
52:4,20,
21,22,24
53:15
55:20
57:4
61:21
63:14
65:15,20,
22,25
66:2,7
67:4,11
71:20
72:15
90:18
99:4
102:15
105:7,24
106:13
109:7
114:8
118:22
121:10
133:5
135:8,12
137:23
145:22
160:23
186:18
191:10
194:14
204:18
211:12
219:17
220:23
223:16
224:2
229:21
237:21
240:5
241:13
242:25
243:22,23
244:2
246:10
249:12
251:5
254:21
255:20
256:3,10
258:3
260:7,9
261:17
264:4
268:23,24
273:21
274:17
276:3,8,
12,23

parte
108:3
134:20
135:9

Partes
10:24
11:10
108:14
133:24
136:13,21

particulars
124:10

parties
4:3 49:20
50:10
51:20
52:5,11
124:3
158:19

partly
90:18
168:11

parts
89:3
103:12,
16,18
229:20
230:6,7,
14
263:11,12
264:4
268:24

party
15:14
49:24
50:6,12
154:21
157:2,6,
21,22
158:10
164:17
167:20,25
184:20
207:13
208:18

pass
25:13
27:14
43:16
46:18
224:4

passage
143:12

passed
26:6,17
44:15

118:7,9
120:4
125:24
126:5

passes
27:15
121:21,23
124:23
125:12

passing
27:18
34:7 52:2
118:11,16
120:15
121:10

past
23:25
90:6,12
221:9

paste
70:21
193:15
223:16

pasted
69:10,25

patent
4:15,18,
24 5:3,
10,12
10:16
11:2,10
12:4,6,9,
10,18,24
13:6
27:20
28:14
34:6
36:17
37:7 38:2
41:9
43:20
70:24
71:17
77:6
81:17,23
82:24
83:7,19
89:22
106:16,24
107:13
108:6,16
109:20,22
111:3,13,
21 124:17
134:2,21
136:14,22
137:7
138:18
140:9,18
141:4
158:6
159:4,25
163:11,17
164:4,15,
16,22,23
165:4,18
167:16
174:25
178:23
187:12
193:7,19
196:24
197:8
198:9,14
201:3
214:13
232:11,15
234:11
235:24
239:2
242:12
245:8,13,
18 246:25
248:8,18,
19,24
249:3,9
250:15,
17,21
251:7,23
252:2,4,
16 253:7,
13,21,23
254:3,5,
9,12
255:8
257:20
258:15,
18,20,24
259:10,16
262:7,17
265:6
266:8
268:15
269:23
270:16
272:18
273:9,11
274:10

patents
111:20
157:13
235:13
237:7
267:9
268:5,6
269:15,16
271:21
272:11

patents-in-suit
246:16
247:24

Pause
73:3

pay
153:24
167:20

paying
17:4

payment
15:19

PDF
171:9

pen
220:7

people
40:2
101:22
104:12
152:10,12
154:9,14
155:25

Perfect
277:11

perform
215:7
221:4
240:18
258:7
275:2
277:7

performed
166:8

performing
170:21
171:6

permission
190:9

person
21:2
24:24
25:25
29:17
37:8,9
104:7
116:5
118:13
131:6,14
213:6
224:5

personal
100:16,22
101:6,16,
20,25
102:6
103:4,7

petition
160:3

Petitioner's
133:22
134:18
136:11,19

Petitioners
108:2,12

ph
237:7

Ph.d.
98:10

philosophical
48:20,24

philosophically
49:2

phone
8:25
20:13

photocopy
13:3

phrase
23:7
212:17

phrased
205:22

physical
145:4,8
159:8

physically
122:24

pick
39:17,20
159:16,17

picked
92:17,21

picture

203:18
222:24
244:10

pictures
222:2

piece
222:9

place
52:5 77:9
172:8
173:13,15

places
36:24
55:9
147:2
199:7
231:22

plain
31:15
33:17

platforms
169:21
176:6

pleas
192:19

plenty
177:11

Plow
237:7,9

point
10:6
26:5,15
27:13
30:18
56:17
85:22
86:23
88:2
95:16,17
98:12
107:21
133:5
160:7
170:14
204:19
205:9
206:11
211:18
213:10
224:10
248:12
251:15
271:15

pointed
118:2
191:16

pointing
80:15
139:12
172:11
226:7

POR
102:17,20
103:10

portable
46:20

portal
68:10

portion
84:5,7
103:11,15
257:10
258:4

portions
248:23

POSA
33:12

posing
62:3

POSITA
37:22
167:23
168:19,23
173:24
177:6
182:6
184:18
196:12
198:6,16
201:6
204:8
206:22
210:14

position
163:19
205:19
207:20,23
208:2,13,
25 209:4,
14,18,19
218:6

possibility
47:20
54:5
224:25

possibly
37:14
122:25
199:24
218:20
274:17

post
150:18

Post-it
12:25

posted
148:21
149:4
150:9
162:3,4,7

Prakash
113:24
152:14

pre-existing
169:19
176:5

preamble
174:10
201:23,24
202:4,5,
20,22
203:11
206:11
259:18

precluded
144:13,17
145:12

preparation
13:18
106:13

prepared
18:8
81:22
102:13,16
111:8
128:5
208:3

preparing
14:8
89:14
95:18
137:24
140:15,23
160:23

present
129:4
199:23
242:19

presented
75:24
161:11
169:5
227:4

presenting
199:15

presents
55:19

pretty
31:6
247:11

previous
15:13
16:21
17:24
18:3
184:18

previously
6:18
12:14,22
17:24
138:12
160:11
163:6,8
165:3
196:16
216:21
245:3,11,
16,25
246:2

print
62:8,10,
13,23
63:9,11
171:10

printed
161:13,23

printer
161:14

prior
9:21
19:25
56:8
81:16
104:9
187:4
191:20
193:21
200:11,
19,21,23

priority
200:12
204:8

privy
17:13
128:9

problem
132:23
133:3
188:7
191:3
263:15

problematic
191:18

problems
161:10

procedures
96:25

proceeding
84:21
189:12

proceedings
13:9
180:5

process
120:8
125:2,3
151:14
160:23
164:11
166:7
168:20
170:22
171:6,16,
19 175:8
185:11
195:11
204:7
212:13
215:2,22
219:18,25
220:21
224:13
228:3
242:22
251:12
252:19,20
255:6,24
256:7,11
257:4,9,
15,22
258:6
260:2,3,
14 271:7,
12,16,22
272:17
274:25
275:2,8
277:2,7

processes
125:15
173:6
210:11
212:3,6,
8,11,20
220:2
248:22
249:15
250:16
251:9
271:9

processing
19:13,15,
18,20
20:6,22,
25 21:10,
15 22:5,
14,17,24
23:7
24:11,18,
21 25:2,7
64:20
67:2 69:5
73:14,25
81:13
82:6,7,
10,11,18,
20 83:6,
10,12
84:4
98:14
128:20
129:5,7
130:5
131:24
132:2,4
273:5,20
274:5
276:5,11,
23 277:4,
10

produce
15:21
16:13
49:20
50:18
73:13

produced
47:18
50:16
54:10
82:3
124:2
128:11

producing
67:22
122:3
128:16

product
121:14

profession
19:8

professiona
l
19:6

program
35:11
40:21
62:22
65:9
66:14
69:15
70:20
101:2
125:7
126:12
128:7
176:5
217:24
226:13
235:4,7,
11,12
237:6
256:21
258:9,11
261:14,
16,18,21

programmed
82:17,23
83:18

programmer
268:2

programming
38:22
39:3,6,
10,17,20
40:6,10,
13,15,22
41:19,23
42:2
62:19,24
63:3,4,
14,21
64:21
65:11,12,
15,19,25
66:9 67:4
169:20

programs
217:25

promise
272:8

proper
161:24
249:2
253:20

properly
190:10
246:16
247:23
253:5,23
271:20

propose
101:3

proposing
198:6
201:20
207:5
210:13

proposition
267:8
268:6
269:16

provide
8:5 14:14
85:11,19
124:19
164:23
216:17
265:3

provided
14:10,23
103:11
118:19
123:8
146:22
260:16

providing
14:20
16:3
85:13
108:3,13
118:14
133:23
134:19
136:12,20
253:17,24

PTAB
14:9 18:9
82:21
83:16
85:9
146:17,22
150:7
151:25

152:6

publication
99:25
132:20

publications
19:19
132:19

publicly
108:23

publish
19:9,12
21:22
260:10

published
18:17,25
20:3,20
21:5
98:13
147:25
153:14

publishing
266:14

pull
165:2

pulling
12:19

punishable
143:6

purpose
265:18

purposes
41:9
128:25
156:9
159:25
163:17
165:15
180:3
182:14
187:12
190:10
193:18
232:14
233:7
241:9

Pursuant
107:25
108:11
133:21
134:17
136:10,18

pursuit
96:22,23
97:5,10,
13

push
93:13

put
66:21
79:23
95:18,19
119:20
146:11,16
153:17
156:17
220:8
225:9
259:7

putting
88:9,12
150:15
218:4
225:15
275:19

Q

qualifications
18:24
84:19,23

qualify
17:20
26:22
27:9
71:15
83:12
84:12

qualifying
36:10
48:15

question
14:12
26:11
28:12
36:15
45:2
48:11
56:20
57:20,24
59:10
61:3
70:16
71:23
72:13,14,
17,19,21
74:14,16,
18 76:17
77:21,23,
24,25
78:4,10,
12,15
83:13,16
92:25
93:17,18
99:8
101:18
105:8,11
119:14
120:25
121:3,8,
17,19,20
124:8
125:20
132:8
140:8
156:10
160:14
163:15,
23,24
164:6
166:4
170:10
172:4,14,
16,19
174:22
178:8,22
190:11,
12,15,16
191:7,12
194:4,8,
23,25
195:4
197:3
203:6,7
210:21
211:10
217:9
231:6
237:19,20
241:10
270:13,22
272:6,24
273:15

questioning
272:23

questions
50:22
64:7,9
67:11
78:4
132:9
189:3
190:23
195:3
221:11,12
248:2
270:9
271:2

quick
242:7
272:8

quickly
103:25

quotation
255:10

quote
204:14
228:2
252:4
271:11

quoted
257:19,20
258:16

quotes
271:5

quoting
231:21

R

raised
197:19

randomly
80:4

range
17:9
87:14,18
94:5

ranges
140:20

rate
15:5,9,
11,12,18,
19,20
16:4,9,25
85:5,9,
13,20

read
28:13
72:23
81:7
100:25
102:14,
17,22
103:10,

19,20,22,
24
104:21,24
105:24
106:7,12
115:24
117:19
137:19
142:23
143:13
144:3
148:4
165:11,13
166:13,20
171:4
172:22
174:21
179:7
186:24
188:3
192:4,5
193:6,18
194:21
204:17
206:22
219:22
220:15
223:19,21
227:15
230:10
238:11,25
245:22,25
246:8
252:3
258:4
266:4
269:21
270:5,6,
11

reading
71:17
72:21
84:5
110:8
112:9
117:16,17
127:23
187:23
190:20
191:10,14
194:15,
16,17
248:7
252:7

reads
181:11

ready
59:7,23

realtime
123:5,9,
11,13,14,
15,16,17,
24

reason
7:10
23:22
35:7
93:25
134:8
145:4,8
148:19,
23,25
159:21
161:7
162:23,25
167:3
176:11
185:25
199:4
204:5
206:4
236:8,14
243:5

reasoning
186:9

reasons
35:4,6
236:15

recall
23:11
120:21
193:8

receipt
31:24

receive
30:24
31:8,19
32:7,11
252:18
254:14
259:14

received
119:9

receives
32:2,15
44:17
45:15
79:21,22
203:15

receiving
17:16
27:16
28:18
30:6,14,
15,20
31:23
46:6
52:24
53:14
67:10
68:10
80:24
208:19
254:20
276:6,9

recent
20:11
98:13

Recess
59:21
133:18
195:8
242:10

recognition
19:17
22:25

recognize
5:18,21,
23,25
6:3,5 7:8
9:13,15
11:20,23
108:19
112:7,8
134:24
135:19
136:25
147:15
151:2
197:5
216:24

recognized
13:13

recognizing
176:12

**recollectio
n**
23:9

reconvene
59:4

record
4:11
15:25
16:10,21
20:9
57:21
72:23
73:5
95:15
108:25
127:24
135:9
142:23
188:22
195:7
214:10

records
91:9

red
226:7

reduce
174:8

reexamine
23:25

refer
12:9,16
13:5
16:20
38:5
111:14
117:12

reference
131:13
144:6,8
180:6
243:21

referenced
142:16
270:15

references
36:13
128:18
144:10
146:24,25
151:24
152:5
159:5
160:3
163:18
166:13
208:6

referred
102:10
113:2

referring
13:6 18:8
103:3
111:16
114:2

141:13,16
142:13
165:12
171:13
173:22,23
184:4
221:25
223:6
244:3
255:2
256:5,18,
19 261:20
272:11
274:21
275:22

refers
30:6

reflect
148:21
149:3
150:17

reflected
148:15,17
149:12
150:6
151:15
152:14
181:18

reflecting
112:25
116:6,21
147:21

reflection
100:22
161:15

reflects
9:18
168:7

reformulate
164:6
166:4

refreshment
269:22

regard
226:17

reimbursed
85:24

rejects
158:22

relate
18:20
19:19
20:5,21
249:4
254:7,13
255:7
274:10,12

related
21:18
22:8
23:3,5
91:5
123:4
153:12,15
254:4
264:19
265:3

relates
172:4
224:12
248:21
249:14
250:15
251:8
254:17
255:19,25
257:10
258:5
259:15

relating
10:16,25
13:14
107:13
141:3
245:13

relevance
88:25
267:23

relevant
172:19,
20,24,25
264:18
265:4,13,
16,18
266:16,23
267:3
272:16
273:9,14,
16 274:17

reliable
220:3

relied
104:25
105:4,15
131:19
182:5

rely
79:15,19,
24 116:5
180:22,23
183:2
196:23
197:6
222:14
231:20
237:6
244:16

relying
165:15
170:20
180:19
181:3
185:4
196:18,19
198:5
203:17
205:16
211:20,22
212:3
214:7
221:6
224:3
239:22
240:4,5,
14,15
242:24

remarks
271:2

remember
10:6
89:21
90:5,13
97:25
98:9,12
107:18
109:4
110:20
115:7
128:22
149:8
246:14

remind
59:15

remote
216:8
217:20,25
219:2
232:12
233:25
234:3,14
237:13
240:17

remotely
192:21
217:23
219:6
232:6
233:23
240:13

removing
253:16,17

render
171:5
176:18
185:10
198:25

rendering
179:22,25
180:8

renders
231:4

repeat
128:15

repeating
253:15

rephrase
28:12
34:20
38:24
55:14
98:21,23
116:18
124:7
197:3
217:8
250:13
254:11

rephrasing
78:5,7,8

replace
68:22
159:21

reply
10:8,11,
14,19,23
11:4,8,13
12:3
13:15
90:2 97:6
102:13,16
107:8,18
109:19,
20,23
110:11,22
135:13
137:6,24
141:2
146:3

160:24
247:21

replying
81:4

report
56:19,24
57:2,8,
10,12
60:8
82:17
105:22
196:5,24
197:8

reported
130:3

reporter
66:19
67:9,15,
20 68:6,
20,23
69:4
72:21
190:24

represent
109:13
147:12

representation
150:9

represented
50:12

reputable
132:21

request
47:15
58:9
228:13

requested
47:19
264:12

requesting
19:23
20:2
223:23

requests
172:10
206:25
207:9
209:7,24
210:17

require
25:15,23
55:2
96:25

required
72:4,11
83:5,14
95:19

requirement
73:12,17

requires
42:6
54:11
82:5
97:15,16
128:19
129:3
228:19

requiring
35:14
82:10
83:9
185:8
256:11

reserved
111:19

resided
216:3
217:16

residence
4:11

residing
217:2

respect
18:24
31:2,10
32:22
89:14
92:8,9
94:9
97:13
100:9
107:4,12
113:2
115:13
118:25
140:18
141:22
143:12
154:10
159:3,7
163:11
164:10,14
165:8,24
166:8
167:12,15
169:6,9
172:22
174:25
178:24
183:4,9,
13,15
196:23
200:20
214:23
221:4
242:11
243:14,20
244:7
245:18
246:10
250:17,20
258:14
262:16
271:24
272:2

respond
50:19,22
54:4,6
68:11

responded
76:21
92:6
150:17

responding
53:19
176:16
188:5,7

responds
39:5
51:12,14
79:22
80:4

response
26:21
29:2
42:24
44:21
45:22
46:12
48:8,10,
13,15,16
49:8,13
50:7,13
51:9,11
64:9
75:5,11,
12,19
76:25
78:20,25
79:15
80:9
108:2,12
116:7,23
119:12
133:22
134:18
136:11,19
148:12
149:11
171:17,25
188:10
276:20

responses
148:6,8
149:14,19

rest
51:8
84:12
120:9
154:10,12
172:19
183:21
209:25
224:8
268:16
277:15

restate
57:24
163:16

restatement
249:25
250:3,4

result
235:19

resulting
105:25
172:5

results
223:12

resume
58:6

retained
15:2,16
16:5

return
173:3
174:9

reuse
138:14

review
10:25
11:10
106:21
107:5,13,

16 108:4, 15 133:25 134:20 136:13,22 145:25 245:8,17

reviewed
7:21 13:17 105:4,15, 20,21,24 106:8,12, 23 110:14 115:4 140:14,23 145:20 162:15

reviewing
11:16,17, 21 75:23

rewording
249:17

rises
74:17

Road
4:13

Roborana
147:25 153:13,14 158:2 164:10 212:12 233:4,11

robotic
195:11 219:25

robots
169:18 176:3

rock
222:24

role
34:16 227:6 271:15

Roman
106:2,11

room
68:7 104:13,14

roughly
94:22 95:2,11

RPA
114:6 115:14 116:2 117:3 118:7,9, 12,15,16, 23 119:5, 9,13,16, 21 121:11, 21,23,25 122:2,6, 7,10,12, 14,17,19 123:2 124:11, 23,24 125:12,24 126:25 127:4,6, 18 128:17 138:7 147:23 150:18,25 151:3 152:15, 20,23,24 153:13 158:9,17 159:14, 15,16 161:22 166:20 167:21 173:2 179:15,16 183:19, 20,22 192:6 204:11 206:5,8, 20,25 207:9 209:7 210:20 214:15 221:21 223:12 224:22 225:2,3, 13,24 226:10 233:4 234:12,21

RPAS
210:3,4,9 211:2

rules
190:4

run
47:12 180:25 182:20 184:19 217:22, 24,25 227:17 232:5,19 233:5,14, 17,20,25 240:6

running
99:4 179:19 181:5 184:14 187:16 192:18, 20,21,22 218:18, 19,24 219:6 226:10 227:2 228:14 229:8 230:15 232:25 233:22 234:5 239:12,16 240:13 241:2

runs
178:15 228:18

S

Sachin
113:24 152:13

Salem
4:13

sandwich
75:17

save
174:5 260:6

scenario
40:8 53:24 225:17 239:25

science
154:21,23 155:11, 12,15,17, 18

sciences
155:19

scientific
96:22,23 97:5,10, 13 131:16

scolding
47:12

scope
36:22 38:20 122:25 154:24 200:11

screen
222:22,23 256:22

screenshot
113:14 114:10,22 138:7

searching
20:11

secondary
200:14

section
107:25 108:11 133:21 136:18 143:8 247:10

seeks
190:24

select
252:19 255:4,5, 24 257:9 260:3 265:25 266:5 268:25

selected
256:24

271:10
273:6
274:6
275:9,12

selecting
264:5
265:25
266:2,3
275:17

selection
275:20

selects
263:16

send
38:9
122:9
226:3

sending
127:10,
11,13,17

Senne
114:6
115:14
147:23,24

sense
21:19,21
38:11
47:4 48:2
50:23
98:6
100:6
131:3
168:4
198:2
208:21

sentence
55:13
84:18
100:20
101:25
137:13
144:4
206:22
219:22
247:7
248:19
249:20
252:15
262:3,6,
15

sentiment
25:16,20,
24

separate
135:18,20
155:4
241:11

separation
155:5
157:18

September
115:21
116:11,
12,23
162:8

sequence
64:16
256:23
258:7
261:15
275:3
277:8

server
234:5
237:13

service
16:5
154:5,6
156:19
157:12
158:4,24
160:5
163:21

session
232:5,17,
23

sessions
170:2
238:23

set
20:25
25:10
29:18,21
33:11
100:16
103:4
168:7
266:2

sets
173:8
268:20

setting
210:2

shaking
99:8

sheet
8:6
272:12

sheets
19:24

short
47:7
121:12,14
125:3
193:11
213:21
249:9
250:8,10

shorthand
47:21

shortly
54:23

show
20:11
107:22
147:9
163:7
220:9
242:18
244:25
245:15

showing
121:12,14
187:16
192:14
222:2
225:7
263:6

shown
109:6
187:10

shows
178:3,16,
19 183:25

side
35:3,8
47:25
73:16
120:5

side-by-side
149:13

sides
145:20
207:16

signature
69:10,25
70:21
75:15,18
76:23
118:10,
17,18
119:10
120:6
122:4
124:21,25
125:13
142:21,24
171:17
193:15
203:19
221:17,24
223:16
236:12

signed
143:11,23

similar
247:13
252:23
257:24

simple
43:18
46:25
64:6
130:6,8,
10,11,12,
15,18,21,
25 131:2,
6,9,14,19
178:7
185:20
188:12,14
191:12
193:11
194:24

simply
194:12
263:16

simulate
258:9
261:14

single
74:11
103:5
106:7,23
206:8
227:6

Single-sided
7:11

sitting
99:11
100:6
104:3
124:9

127:22
128:3
179:18

skill
20:25
21:2
24:24
27:6
29:12,17,
18,21
33:11
37:9
71:17
116:5
155:8,14
175:14
200:13
213:6

skills
30:10

snapshots
118:20
123:7

software
35:16
69:15
81:21
187:9
215:25
217:15
218:8
219:6
222:9,25
226:4,8,
13,15
227:2,9
228:25
229:6,8
233:5,12,
17 238:24
239:16
241:12,16

softwares
229:2

solely
220:12

solution
251:3
252:5,16
253:6,20
254:4
259:12

sort
35:16
37:13
47:20
64:25
110:8
131:13
135:18,24
146:7
173:22
220:15
256:13
257:5

source
132:16

South
4:12

space
66:21

spare
262:14

speak
38:7
67:24
84:2
117:5
126:24
151:17,
20,23
152:4,9
154:14
189:2,11

speaker
211:16

speaking
52:2
67:13
160:8

special
46:18
101:2
155:8

specific
14:14,17
21:23
24:8
25:18
37:18
42:9
44:24
45:7 50:3
51:3
66:20
71:24
75:25
77:14
119:24
132:5
138:15,18
180:15
185:14
187:9
224:11
242:23
248:2
265:4

specifically
33:19
53:9 81:4
82:3
85:9,13
109:7
128:21
135:17
138:11
173:19
181:22
182:24
212:4
213:2
231:12
236:24
264:15
266:20
267:18
268:22,23
269:3

specification
267:5,20
268:15,16
270:16
274:7

specifications
36:8,11
37:14
83:23,25
84:9,11
253:22
255:11

speech
19:17
22:24
38:9
64:15

spend
57:25
90:25
91:13,14,
20,22
95:10
96:21
98:17,24
99:17
100:3,11
144:22
248:14

spent
92:24
93:4,23
95:7
98:19,25
99:24
100:4,7

spoke
15:10

spoken
152:12

spread
99:18,20

stage
173:8
210:2

standard
15:5,8,
18,20
16:4,9,25
25:10
55:23
85:4,20

stands
74:16
77:21
78:7
131:23

start
47:11
59:7
90:10
93:2
242:13
248:4

started
53:23
58:16
176:23
239:11

starting
28:13
53:25
54:2
255:22
257:11
258:20,21

starts
29:7
173:17
209:16

state
4:10
237:22
269:6

stated
32:8
83:10
103:6,8,9
264:18
267:23

statement
50:12
51:7 57:6
66:23
68:12
82:11
101:16
103:13
146:16
266:22
273:17
274:13
275:5

statements
142:25
143:3,4,
6,16,18

states
143:8
266:20

stating
142:24
264:19

station
232:12

stay
77:14

step
209:3
273:3,6,
18 274:3,
6

stick
48:24
51:2

stipulate
6:14

stop
188:14
202:2
219:13
277:12

strengthens
199:22

strike
62:22
76:18
121:5,7
160:19

stronger
199:17,18

strongly
208:10

struck
36:2

structure
185:14

student
98:10,15,
17,19,25
99:16
100:8

students
64:14
98:10

stuff
240:23

subject
18:20
22:19
26:12

subjective
131:13

submission
70:11
114:21

submit
14:20

submitted
10:9
14:15
18:8
19:2,21,
25 20:4,
20 21:6
107:23
112:25
113:20,23
114:18
115:12,21
116:7,21
149:21
150:7
151:25
152:6
214:13

submitting
160:24

substance
112:6,8
161:15,16
189:12,
18,23

substantive
8:9

substitute
252:2

successful
186:10
212:9

sufficient
239:12

suggest
202:4
248:5

suggesting
146:13
189:13

suggests
214:25

summarize
249:8
265:21

summarized
168:7
247:23

summarizes
249:9

summary
198:18
205:18
209:8
217:4
249:3,7
250:5,8,
10,21

superficial
119:14

supplement
221:2

supplemental
107:24
108:3,10,
14 111:23
133:20,24
134:16,19
135:18
136:5,9,
12,17,21
138:2,16,
20 199:16

supplements
215:10

support
170:23
206:10
209:19
243:3
268:5
270:7

supporting
208:21
269:15

supports
206:9

supposed
47:6
129:14
235:17

supposition
124:12

surmise
34:10,13

surmised
34:21
35:10

surmising
34:16
51:8

swore
139:21

sworn
4:4
146:16

Symons
60:12,17
61:21
69:6,9,24
70:9
113:2
114:4,5,
7,20
115:14,17
116:8,24
117:3

118:8
119:19
124:4,6,
20 125:25
126:18,23
127:23,25
128:6,11,
15 129:9,
16
147:18,
19,24
150:18
151:17
159:4
160:2
163:18
164:14
165:16
166:13
167:10
168:18
169:9
171:5,15,
18 173:12
174:18
175:3,16
176:3,9,
18,20
177:9,15,
16,20
178:2,8,
10,16,19,
25 179:11
180:11,
23,24
181:11,
12,15,18
182:13,17
183:2,4,
8,16,18
184:2,12,
15 185:4,
10,14,18,
22,24
186:4,6,
16,18,24,
25 187:8,
10,25
190:20
191:10
192:8,16
193:5,19
195:21
196:9,11,
14,17,21,
22 197:5,
11,13
198:6,13,
16,24
199:6,11,
12,19,24
200:20,
22,23
201:15,
20,23,24
202:3,5,
15,17,21
203:14
204:5,20,
22,24
205:13
206:19
207:6,14
208:14
209:2,5,
22
210:14,
16,19
211:5,25
212:3
213:3
214:14
215:6,11,
23
216:16,
17,18,25
217:13
218:13
219:11,
16,24
220:12,22
223:13
224:11,
20,24
225:14
229:8
231:3,4,
6,8,17,19
238:17
240:3,25
242:13,
17,21
243:3,8,
13,23,24
244:3,16,
21

Symons'
69:8
126:11
222:22,23
233:9
243:3

system
9:4 101:3
164:3,5,
12 165:8,
17 166:9,
15 167:2,
7,8,12
168:21,25
170:4,22
171:7
172:6,7,
24
173:11,
16,21
174:2,17
175:4,8,
17 177:8,
10,15,17,
22,24
178:3,9,
14 179:2,
13,20
180:13,16
181:15,17
182:2,3,
14,18,21
183:3,10,
17 184:8,
24 185:5,
12,15,17,
23 186:2,
17,19,25
187:2,6,
11,22,24
188:2
190:21,25
191:11,17
192:22,24
193:6,17,
18
194:20,
21,22
204:10
213:4,10,
14 215:2,
8,12
217:24
221:6
222:3,21
224:18
226:9,12,
17,18,19,
20,22
227:4,5,
10,13,14,
15,17,18,
19 228:5,
7,9,11,
14,15,21,
25 229:9,
14,17
230:10,16
231:16,25
232:2,7,
14,18
233:2,12,
22 234:4,
5,6,7,10,
13,14,16
235:4,8,
9,10,11,
13,15,18
236:3,5,
7,18,19,
23 237:3,
7,9,16,24
238:2,6,
9,10,14,
15,16,25
239:6,12,
23 240:23
241:4
242:23,25
243:10
244:21
252:22
257:24
261:20

system's
236:10

systems
21:11
40:3
168:3
182:25

systems'
169:22
176:7

T

table
104:8

takes
97:7 99:6

taking
52:5 58:2
127:5

talk
21:19
35:11
84:3
117:18
154:4
158:8
169:14
171:20,23
173:14,15

184:25
189:21
190:9
212:6
254:9

talked
28:10
71:7,10
97:19
150:23
159:15
168:15,22
171:15
172:21
229:23
259:15
276:22

talking
14:25
39:11
46:2,5
48:16
49:6 51:4
56:21
61:23
68:21
83:6,7
110:7
113:22
114:3
115:18
147:25
164:22
172:13,
15,18
173:20,23
187:20
191:25
192:13,14
193:12,14
210:6
215:10
216:16
222:20,21
224:16
231:11,13
233:15
235:14
253:25
259:13
260:25
261:3
263:18,
20,23
265:7,13
267:15,19

talks
27:20
167:4
168:3,17
169:15
170:5,6
175:9
205:6
210:3
221:3
231:23
275:20

target
101:3
164:3,12,
18 165:8,
17 166:9,
15,25
167:7,8,
12 168:25
170:4,22
171:7
172:5,7,
24
173:11,
16,21
174:2,12,
17 175:4,
8,17
177:8,10,
15,17,22,
24 178:9,
13,14
179:2,20
180:13,16
181:15,17
182:2,14,
18,21,25
183:3,10,
17 184:8,
24 185:5,
12,15,17,
23 186:2,
17,19,24
187:2,6,
11,21,24
188:2
190:21,25
191:11,17
192:22,24
193:6,18
194:20,
21,22
215:2,8,
12 217:24
218:25
219:2
221:5
222:21
227:15,18
228:5,11,
14 229:9,
14,16
230:10,16
231:16,
17,25
232:2,6,
14
233:12,22
234:3,5,
6,7,8,10,
11,13,14,
16 235:4,
9,10,11,
13,15,16,
18 236:2,
4,6,10,
18,19,23
237:3
238:2,6,
9,10,15,
25 239:23
240:23
241:3
242:25
243:10
244:21
252:22
257:24
261:20

targeting
219:2

teach
177:17
185:25
204:23
205:16

teaches
177:9,11,
15 199:13
204:21
209:2

teaching
207:6

teachings
23:20

team
153:9,17,
18 159:2

teams
157:8,17,
18,19,24

technical
97:11,12,
14 251:3
252:5,16
253:6,20
254:4
259:12

technique
127:19,20

techniques
273:5,20
274:5
275:7,8,
22 276:6

technologies
49:16

technology
49:16
148:2

telling
28:4,5
92:22,23
100:2
124:16
180:24
190:7
192:12,15

tells
127:16
140:3
172:23
192:8

ten
186:22
270:8

term
25:8
29:11,22
30:25
31:9
131:5

terminal
170:2
232:4,12,
13,17,23
233:20
237:10
238:23
240:13,17

terminology
130:20
181:21

terms
14:9
37:13

97:2
153:16
167:25
203:22

test
40:2

testified
4:4

testify
13:24
134:13

testifying
134:9

testimony
8:19
56:9,15,
21 97:8
110:13
135:22
226:23

text
148:3

thereon
252:18
255:4,5,
24 257:9
260:2

thereto
166:23

thing
9:22,25
93:11
103:5
104:2
110:7,8
119:3
146:9
158:14
159:13,22
175:22
179:17
187:19
205:14,
21,25
211:6
212:2
213:22
214:2
215:6,9
217:23
223:9,13
224:6
227:6
230:5,21
231:12
237:11
242:21
243:2
247:12
248:14
251:22
274:16

things
8:13
17:18
18:18
24:17
37:19
68:23
91:8
100:4
122:16
146:17
158:18
159:12,24
168:22
170:11
174:6,10
177:12
178:18
184:3
187:16
198:23
199:8,23
205:7,17
208:6
210:4,8
211:6,17
217:22
221:2
234:20

thinking
49:5,7

thinks
151:10
190:13

third-parties
233:6

third-party
154:4,5,
9,17,24,
25 155:5
156:19,25
157:12
158:4,23
160:5
163:20
164:3,5,
12 165:8,
17 166:8,
14,15
167:8,11,
22 168:3,
21,24
170:4
172:6
173:5,11,
14 174:12
179:13,16
182:3,20,
25 183:3
185:17,
23,25
197:23
221:5
231:16
232:2,6,
13,18,20
233:2,12
234:3,14
235:4,8
236:4,6
238:2,4,
6,10,15,
24 239:18
241:3

Thomas
165:2

thought
78:5
114:3
141:20
203:6
211:4
244:2
259:6

three-part
266:10

time
11:19
15:24
17:8 39:7
57:5
58:2,25
59:8 68:2
77:10,11
91:4
92:19
93:4,17,
23 95:10
96:7,25
97:7,16,
22 98:24
99:6,17,
19,23
100:3,7,
11
117:16,19
118:12
144:22
145:25
149:17
152:7,10
174:5
175:14
177:4
179:4
204:8
208:2
213:8,25
220:17
248:10
260:6
277:16,17

times
77:24
84:2
186:22
248:15

tired
275:15

title
55:25
56:2
143:8
147:22
166:22
195:20
249:18,25
250:3,5,
10

titled
248:20

today
6:8 7:22
8:19
59:17,18
90:6
97:23
100:7
104:3
122:22
124:9
127:23
128:3
134:8
152:20
170:18
246:3
247:19
277:12

today's

6:15
13:18
220:9

told
55:6,18
92:16,21,
23 131:18
189:20
192:4
259:4

tomorrow
59:17
272:25
277:13

tomorrow's
6:16

tool
152:15,
20,23,24,
25 153:7,
8

top
60:11
61:21,22
114:7
116:10
128:21
133:14
141:5
165:6

total
86:8
91:21,23,
25 94:8
168:6

touched
22:21

touring
39:25

training
67:7
70:4,23
77:5 79:3
155:9

transcript
6:15,16
7:2,4,19,
22,25
9:8,9,18,
24 10:4,8
11:17
104:21
105:21
107:10

transcripts
20:2

**transmittin
g**
33:3 75:3

**transportin
g**
76:11

travel
86:5

treated
157:3,4

trigger
116:2
119:11,13
122:6,9,
10 124:10
125:9,24
168:24
179:12,13
228:22

triggered
117:3
120:4
150:25
151:3
223:14

triggering
118:15,21
119:2,8,
25 124:17
184:14
187:15
215:18
224:6

triggers
118:23
121:21
125:10

true
56:14
65:14
100:18
139:21
141:20
143:2,4,
18,19
146:17
221:22

trust
94:21

truthful
14:2

truthfully
134:9

**truthfulnes
s**
146:23

turn
59:25
142:18
195:18

type
27:6 39:4
41:14
43:8
44:14
49:10
50:17
66:21,22
75:14,16
93:18
202:7
205:3

typed
38:23
76:21
78:19

types
178:17
210:10
212:5,7

typing
26:21
65:8
66:19
68:2
99:12

typo
139:3,11
142:11,16
219:20
220:16

**typographic
al**
144:11

typos
8:8,10

U

U.S.
5:3 10:16
11:2
12:6,24
108:6,16
134:2,21
136:14,22
163:11
165:4
245:18

ultimate
17:12
241:4

unaware
213:12,
18,24

unclear
218:22
219:5

understand
6:7 12:11
14:11,13
17:19
20:24
21:13
22:3,22
25:6 27:5
29:3,12,
19,20,22,
24 30:10,
24 31:8
35:13
37:22
45:2,4,12
53:12
59:19
64:10
67:8
69:11
70:23
73:19
74:2
78:2,13,
14,21
81:21
84:21
92:8,15
100:25
101:10,
12,18,22
102:4,5,
9,11
103:2,5,8
104:21
116:4,20
121:13
127:2,4
131:20
132:16
143:10,15
146:15
153:2

157:14
163:23,24
179:21
180:6,10,
18 185:3,
6,19
186:23
194:11
198:13
200:10
201:7
202:9,12
208:16
216:23
222:19
225:10
228:8
230:20
236:16
237:18,
20,21,23
246:15,19
247:7,22
257:8
259:12
264:21,24
270:2
273:8

understandable
73:15

understanding
23:23
24:2,3,6,
13 25:22
30:3
34:2,18
36:5
43:4,10,
13 45:7
67:6 68:4
70:3
71:14
73:8,11
77:4 79:2
93:23
102:3,7,8
103:2
115:22
154:17
156:22
162:2
195:24
224:19,21
232:10
235:21
239:9
272:15

understands
37:10
73:21,22

understood
205:11
246:16
253:6
271:20

unique
127:17
138:19
154:8
155:13,16

unit
157:4

United
143:8

unlike
189:8

unsure
197:22

uploading
9:4

URL
112:24

usage
199:9

user
28:18,20,
22,25
30:6,8,
20,22,24
31:4,8,
13,23
32:2,4,8,
12 34:9,
23 35:16
40:4
42:8,20,
23 43:25
44:17,19
45:11,15,
17 46:6,
9,12,13
47:2
49:12
51:4,7,
12,14,16,
21 52:11,
24 53:2,
6,15,17,
18,24
54:4,7
67:10,15,
19 68:21
73:21
79:12,15
101:5
118:14
171:17,18
203:15,19
221:17,
18,20,22
222:12,
13,14,20
224:17
225:5,7,
25 226:2
227:2,22,
23 228:4
230:3
235:3
242:20
248:21
249:13,
14,22
250:16
251:8
252:18,
21,23
254:14,
21,23,25
256:7,16,
20 257:2,
3,13,23,
25 258:8,
9,10
259:14,
23,24
260:10,
11,17
261:11,
13,15,19,
21 262:8,
20 263:2,
7,24
265:14
266:17
267:10,
16,17
268:7
269:17
270:18,
19,25
271:6,10,
13,16,21
272:3
273:3,18
274:4,24
275:4,6,
20
276:14,
16,20
277:2,6

user's
183:20
206:24
207:8
209:6

utilize
175:3
205:9
248:22
249:15
250:17
251:9
261:11,13

utilized
73:25

utilizes
33:2,14

utilizing
249:24

V

vague
93:25

values
259:24
260:16

verbatim
247:11
253:24

verify
95:20

versa
47:3
240:23

version
54:16
69:23
137:25

versions
12:15

versus
96:2
179:22,25
180:7

vice
47:3
240:23

video
115:25
118:19
123:2,5,
6,9,10,
11,14,18,
24 124:13
125:25
215:24
217:13

view
160:4
163:19
181:12
193:16
198:7,16
199:13
204:24
207:12
209:22
210:14
211:4

viewed
74:25

Vin
233:9
240:2,7,9

violate
16:5

violation
16:11

virtually
227:19
248:11

Volume
9:8,11

volumes
145:22

W

Wait
106:4

waiting
190:18

walk
247:6

Walkme's
135:9

wall
48:17

wanted
150:24
168:19
173:25
204:18
272:5,22

waste
48:21
59:7

wasting
58:24

watch
123:25

watching
124:13

ways
120:11,
13,18
197:22

wear
242:3

web
169:22,25
170:3
171:7
173:11
176:8
177:23
178:5,11
179:11,
12,18
181:25
187:21,
22,23,25
217:21,22
218:2,3,7
229:10,
11,13
232:7
233:21
235:5,6,
7,8
239:16
240:16

web-based
164:12,17
165:8,17
166:9,14,
15,25
167:5,7,
8,12
168:24
170:4,22
172:5,6,
24
173:15,20
174:2,17
175:3,8,
16 177:8,
10,15,17,
21,24
178:3,9,
12,13
179:2,6,
13,20
180:13,16
181:15,17
182:2,14,
18,21
183:3,10,
17 184:8,
24 185:4,
12,14,17,
22,25
186:2,17,
19,24
187:2,6,
11,21,24
188:2
190:21
191:11,17
192:22,23
193:6,17
194:20,
21,22
215:2,8,
11 217:23
218:14,
16,24
220:21
221:5
222:21
227:15,18
228:4,11,
14 229:9,
14,16
230:10,
16,18
231:15,
16,25
232:2,14
233:22
234:3,14
236:4,6
238:2,21,
24 239:23
241:3
242:25
243:10
244:20

web-browser
237:12

website
149:9,17,
20
161:16,
21,24
162:12,
14,21

Whatfix
195:16

wide
73:12

Widgetco
236:17,20
237:2

willful
143:5

William
185:10
198:16,22

Williams
159:4
160:2
163:18
165:16,
19,20,21
167:4
168:2,15,
17
169:10,17
170:5,8
171:5
172:23
173:5,12
174:18
175:3,9,
10,16
176:2,8,
13,18,21,
23 177:8,
17,23
178:17,20
180:12
181:12,25
182:22,23
183:5,9
184:21,23
185:2,8
186:12
193:19
195:17,22
196:9,11,
18,23
197:6
198:7
199:5,7,
13,15,22

200:2
202:6
204:9,10,
20,21,24
205:6,9,
16
207:18,23
208:5,21
210:3,10
212:4
214:22,25
215:9
220:25
221:3,7
231:4,9,
17,21,23
232:19,22
243:13,
19,23
244:6,9,
22

Williams'
207:6

window
61:22,23
233:10

Windows
222:25
226:6

wishes
71:3

wishy-washy
191:19
192:3

withdraw
28:12
57:20
92:25
160:14
270:13
272:24

withdrew
163:16

word
36:4
37:25
38:8
55:9,12
61:10,13
62:8,10,
13 65:5
69:7,10,
11,14,16,
18,20,21,
23 70:13,
19,20
94:17,18
193:5,13,
14,23
223:2,15

wording
81:6

words
36:2
37:24
41:2
48:22
62:7,15
63:8,18
65:25
67:4
91:20
96:2
125:20
131:8
198:12
204:22
225:9
249:6,7,
12 253:17

work
85:25
86:4,8
90:14,20
98:9
119:20
127:14
137:24
146:15
154:9
157:19
158:19
169:21
174:8
176:7
186:11

worked
90:24
91:3
157:9,20

working
40:2
90:2,7,10
91:13,15
93:5
100:7
119:3
127:15
153:16,19
157:25
158:14,18
159:2
170:3,6

world
154:10,12
228:20

write
96:21

writing
22:16,23
24:10
64:14
97:10,12,
14 98:17,
25 99:3,4

writings
22:13
23:19
25:6

written
23:25
96:12,13,
14 147:23
148:14

wrong
101:13
138:25
140:20

wrote
57:12
96:8
97:18
98:2
107:9
152:25
153:2,13
185:7
270:4

Y

year
88:4,8,
13,16,21,
22,24
89:10
99:18,20
208:9

York
4:13

Z

Zatkovich
81:21
82:3,16,
23 83:4,
11,18
90:15
100:25
102:11
104:3,7
107:4,9,
12,24
108:11
109:21,23
110:23
126:9,17,
19,21
128:4
133:21
134:17
136:10,18
138:2
160:17,20
247:20

Zatkovich's
105:20,21
128:9,18
129:6,24
135:22
207:21
247:18