In the Matter Of:

WHATFIX INC. vs WALKME LTD.

HOMAYOON BEIGI

November 12, 2024

Vol. II

IPR2024-00065
WHATFIX INC. v. WALKME LTD.
WALKME LTD. EXHIBIT 2021
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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WHATFIX INC.,

Petitioner,

v.

WALKME LTD.,

Patent Owner.

----------X

DEPOSITION OF HOMAYOON BEIGI

VOLUME II

November 12, 2024

Reported by:

MARY F. BOWMAN, RPR, CRR

JOB NO. J11937341

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November 12, 2024
9:05 a.m.

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THOMAS HART, ESQ.
DARREN HABER, ESQ.

ALSO PRESENT:
Ziv Glazberg, Esq.
Ivan Zatkovich

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HOMAYOON BEIGI, Resumed. 09:07

EXAMINATION BY 09:10

MR. MACEDO: 09:10

Q. Good morning. 09:11

A. Good morning. 09:11

Q. You understand you are still under 09:11

oath? 09:11

A. Yes. 09:11

Q. And are you -- is there any reason 09:11

why you can't testify truthfully, accurately and 09:11

completely today? 09:11

A. No. 09:11

Q. I'm going to give you what we are 09:11

marking as Beigi Exhibit 38. 09:11

A. Before we do that, during the break 09:11

yesterday, you asked me for a list of my papers 09:11

which I showed you one of them on my phone, to 09:11

look on my phone for them. So I have prepared 09:11

that, if I may prepare that so we can then 09:11

continue. 09:11

Q. Sure, that's the same thing I asked 09:11

you on the record. Go ahead. 09:11

A. Right, but it's a continuation. 09:11

MS. NGUYEN: For the record, this 09:11

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list of papers that Dr. Beigi had, and the 09:11
conversation he is referring to is the ex 09:11
parte communication that we objected to 09:11
yesterday. 09:11
MR. MACEDO: And that was after you 09:11
told me it was all right to speak to him. 09:11
MS. NGUYEN: I did not tell you it 09:12
was okay to speak with him. 09:12
MR. MACEDO: I told you specifically 09:12
that I was going to go talk to Dr. Beigi 09:12
at that time. 09:12
MS. NGUYEN: No. 09:12
MR. MACEDO: I didn't say that I was 09:12
going to talk about this, but you 09:12
specifically authorized me to go speak to 09:12
him to let him know what the status was 09:12
and when I let him -- 09:12
MS. NGUYEN: Status of what? 09:12
MR. MACEDO: We were taking a lunch 09:12
break at that time, if I recall, and I 09:12
told you that I was going to tell 09:12
Dr. Beigi that we were taking a lunch 09:12
break, which is what I did. 09:12
MS. NGUYEN: And then you continued 09:12

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the conversation by asking him to provide 09:12
a list of publications without presence of 09:12
petitioner's counsel. 09:12
MR. MACEDO: I -- Counsel, you 09:12
weren't there, so you don't know what the 09:12
conversation was. But I asked him -- what 09:12
you really want to know if -- 09:12
MS. NGUYEN: You had an ex parte 09:12
communication which is improper. 09:12
MR. MACEDO: Counsel, if you are 09:12
going to talk, you should wait for me to 09:12
complete -- 09:12
MS. NGUYEN: As if that's not what 09:12
you do this whole time. 09:12
MR. MACEDO: You are admitting you 09:12
are not letting me complete my statement? 09:12
MS. NGUYEN: I am, but you are also 09:12
admitting you had an ex parte 09:12
communication. 09:12
MR. MACEDO: I'm not admitting that. 09:13
MS. NGUYEN: You are putting words 09:13
in my mouth. I did not authorize 09:13
anything. 09:13
MR. MACEDO: Counsel, I told you we 09:13

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would take the lunch -- you have to let me 09:13
talk and then you can speak. 09:13
So I told you that I would agree to 09:13
have the lunch break start sooner, at your 09:13
request. Because I did not want to start 09:13
it then. But I agreed to do it and I told 09:13
you, we had a conversation that it was all 09:13
right for me to tell Dr. Beigi that. 09:13
When I went to tell Dr. Beigi that, 09:13
I suggested that he take advantage of the 09:13
lunch break to find the missing 09:13
information. I didn't ask him to tell me 09:13
anything. I just suggested that he do 09:13
that. 09:13
Dr. Beigi took it upon his own 09:13
accord to tell me whatever he told me 09:13
after that. When I was walking out of the 09:13
bathroom, he approached me and identified 09:13
a paper to me. I did not ask him to do 09:13
that. He did that on his own accord. So 09:13
that is the ex parte conversation that you 09:13
are referring to. 09:13
MS. NGUYEN: The communication that 09:14
I am referring to and the word that that 09:14

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you continually use because you want to 09:14
use it to your advantage is to inform him 09:14
that we were taking a lunch break, period, 09:14
nothing beyond that. 09:14
If you want to get into this 09:14
argument, we can talk to the board about 09:14
your communication and happy to call them 09:14
and see whether they believe that that's 09:14
proper or not. You can tell them whatever 09:14
you want about what I said. 09:14
MR. MACEDO: Counsel, this is my 09:14
deposition. The time you are using right 09:14
now goes towards your reply. If you want 09:14
to cross him, go for it, but not during my 09:14
time. 09:14
Please do not start the deposition 09:14
until we are done with this colloquy in 09:14
terms of the timing. Okay. 09:14
(Time noted: 9:14 a.m.) 09:14
EXAMINATION BY 09:14
MR. MACEDO: 09:14
Q. Dr. Beigi -- 09:14
A. May I start with the list? 09:14
Q. Dr. Beigi, let me ask you a question 09:14

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so you give an answer. 09:14

A. Go ahead. 09:14

Q. Is there anything information you 09:14
wish to provide as of this time? 09:14

A. Yes. 09:14

Q. What information is that? 09:14

A. I would like to provide the list of 09:15
papers which I've published after our previous 09:15
meeting, my previous deposition since you asked 09:15
for it in the meeting and -- 09:15

Q. Before you do that, how many papers 09:15
are there? 09:15

A. I believe five. 09:15

Q. Okay. And what is the website you 09:15
are looking at to find those papers? 09:15

A. I'm looking at 09:15
RecognitionTechnology.com which is where I've 09:15
listed my publications. 09:15

Q. And go ahead and read your five 09:15
papers. 09:15

A. Thank you. 09:15

The first one is by Xing, X-I-N-G, 09:15
Yi Y-I, Liu, L-I-U, and Homayoon Beigi. The 09:15
title is Spontaneous Informal Speech Data Set 09:15

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For Punctuation Restoration," and it was a 09:15
technical report RTI-2024 0917-01, which is also 09:15
on archived at ARXIV.org. 09:16
The second paper is -- sorry, they 09:16
are in there, just one second. Author is Zanxu, 09:16
Z-A-N-X-U, last name Wang, W-A-N-G, and Homayoon 09:16
Beigi, Multimodal Emotion Recognition in 09:16
Conversation Using Transfer Learning and 09:16
State-based Models," presented at the 15th 09:16
Annual Machine Learning Symposium of New York 09:16
Academy of Science on October 18, 2024. 09:16
The third one is Sanjay, 09:17
S-A-N-J-A-Y, N-A-T-A-S-A-N, and Homayoon Beigi, 09:17
titled, "Advanced Neural Network Architectures 09:17
for Mode Identification in Indian Carnatic" -- 09:17
Carnatic with a C -- "and Persian Music," 09:17
presented at the 15th Annual Music Symposia at 09:17
the New York Academy of Science October 18, 09:17
2024. 09:17
The next one is Boris, T-E-R 09:17
A-V-A-N-E-S-O-V, and Homayoon Beigi, "MLP, 09:17
XGBoost, KAN, TDNN, and LSTM-GRU Hybrid RNN with 09:17
Attention for SPX and NDX European Call Option 09:17
Pricing" presented at the 15th Annual Machine 09:17

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Learning Symposium in the New York at the New 09:18
York Academy of Science October 18, 2024. 09:18
Last one is Kyle, K-Y-L-E, Hor, 09:18
H-O-M, and Homayoon Beigi and one more author, 09:18
Raimondo B-E-T-T-I -- and Raimondo with an I -- 09:18
"From Experiments to In-Service: Encoding 09:18
Structural Damage Via Speaker Recognition," 09:18
presented at the 15th annual machine learning 09:18
symposium of the New York Academy of Science on 09:18
October 18, 2024. 09:18
Q. Did you bring the errata sheet that 09:18
you provided to counsel according to your 09:18
testimony yesterday through your first two days 09:18
of deposition? 09:19
A. Yes. 09:19
MS. NGUYEN: Objection, form. 09:19
A. The errata sheet which I had 09:19
presented was printed out by the counsel and I 09:19
signed it. 09:19
Q. Could I please have a copy? 09:19
MS. NGUYEN: Here is a copy. 09:19
I would like it note that counsel 09:19
for petitioner is providing a copy of the 09:19
signed errata sheet for Dr. Beigi's June 09:19

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25 and June 26 deposition. 09:19

I would also like to note for the 09:19

record that we do not believe this is 09:19

required and we reserve our rights with 09:19

respect to the errata sheet. 09:19

Further, Mr. Zatkovich and patent 09:19

owner have not provided an errata sheet 09:19

signed by him for his October 7 and 09:19

October 8 depositions and we also do not 09:19

believe that we are required to provide an 09:19

errata sheet for today and yesterday's 09:19

reply deposition. 09:19

Q. When did you -- well, let's go ahead 09:19

and mark the errata sheet. 09:20

(Exhibit 40, Errata Sheet marked for 09:44

identification, as of this date.) 09:44

Q. Dr. Beigi, I just want you to look 09:20

at Exhibit 40 and tell us if that is the errata 09:20

sheet. 09:20

A. Yes, it is. 09:20

Q. What is the date it was signed? 09:20

A. 11/12/2024. 09:20

Q. So you hadn't previously signed it? 09:20

A. I hadn't signed it previously. 09:20

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MS. NGUYEN: Objection to form. 09:20

A. I had sent it to the counsel. 09:20

Q. Are there any other errors that you 09:20
have noted besides the ones that are in Exhibit 09:20
40? 09:20

A. I haven't. 09:20

MS. NGUYEN: Objection, form. 09:20

Q. We are going to come back to this 09:20
later. I just want to let copies be made. 09:20

If we can go ahead and mark as 09:20
Exhibit 38 the Expert Declaration of Ivan 09:20
Zatkovich in Support of Patent Owner Response 09:21
for Interparty Review of claims 1 through 6, 9 09:21
through 16, 18 through 21 of U.S. Patent 09:21
11,258,732 -- from IPR 2023-01379 involving 09:21
patent number 11,258,732. 09:21

(Exhibit 38, Expert Declaration of 09:21
Ivan Zatkovich in Support of Patent Owner 09:21
Response for Interparty Review of claims 1 09:21
through 6, 9 through 16, 18 through 21 of 09:21
U.S. Patent 11,258,732 from IPR 2023-01379 09:21
marked for identification, as of this 09:21
date.) 09:21

Q. And we are going to mark as Exhibit 09:21

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39 -- I'm sorry. We are going to mark as 09:21
Exhibit 39 the Expert Declaration of Ivan 09:21
Zatkovich in Support of Patent Owner's Response 09:21
for the Interparty Review of Claims 1 through 9, 09:21
12 through 16, 18 through 23, 25 through 26, 28 09:22
through 31, 33 of U.S. Patent Number 09:22
10,819,664B2, and it is from IPR 2023-0368, 09:22
patent number 10819664B2. 09:22
(Exhibit 39, Expert Declaration of 09:44
Ivan Zatkovich in Support of Patent 09:44
Owner's Response for the Interparty Review 09:44
of Claims 1 through 9, 12 through 16, 18 09:44
through 23, 25 through 26, 28 through 31, 09:44
33 of U.S. Patent Number 10,819,664B2, and 09:44
it is from IPR 2023-0368, patent number 09:44
10,819,664B2 marked for identification, as 09:44
of this date.) 09:44
Q. And just for the record, I'm not 09:22
going to ask you any detailed questions, but I 09:22
just want to know if you recognize Exhibit 38 09:22
and 39? 09:23
A. Yes, I do. 09:23
Q. And how do you recognize Exhibits 38 09:23
and 39? 09:23

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A. Exhibit 38 is Mr. Zatkovich's 09:23
declaration on Patent '732 and 39 is 09:23
Mr. Zatkovich's declaration on patent '664. 09:24
Q. Okay. And to the extent that you 09:24
noticed anything that you disagreed with in 09:24
Exhibit 38, with respect to Mr. Zatkovich's 09:24
opinion, on '732 patent, you identified what you 09:24
disagreed with in your reply declaration, 09:24
correct? 09:24
A. I did. 09:24
Q. With respect to 39 and the '664 09:24
patent, to the extent you disagreed with 09:24
anything that was set forth by Mr. Zatkovich in 09:24
his declaration, you identified it in your reply 09:24
declaration for the '664 patent, correct? 09:24
A. Yes. 09:24
MS. NGUYEN: Objection, form. 09:24
Q. And the same is true with respect to 09:24
Mr. Zatkovich's declaration with respect to the 09:24
'317 patent that we were discussing yesterday; 09:24
to the extent you had any disagreements with 09:24
what was in that declaration, you identified it 09:24
in your reply declaration for the '317 patent, 09:24
correct? 09:25

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MS. NGUYEN: Objection, form. 09:25

A. To the extent that -- yes, I know 09:25
of, yes. 09:25

Q. Okay. So what I'm going to -- so I 09:25
would like you to look at Exhibit 28, which is 09:25
your reply declaration for the '732 patent. 09:25

A. Yes. 09:25

Q. And I want you to have next to you 09:25
Mr. Zatkovich's declaration and I'm going to 09:25
focus on the claim construction of "computer 09:25
program" as set forth in Mr. Zatkovich's 09:25
declaration and in your declaration. 09:26

A. Yes. 09:26

Q. Okay. And Mr. Zatkovich has 09:26
indicated on his index says that he talks about 09:26
computer program at page 48, although it looks 09:26
like it is not page 48. It's page 576250. And 09:26
here is your errata sheet. 09:26

A. Thank you. 09:26

Q. So we are looking at paragraph 108, 09:26
computer program on page 57. 09:26

A. Yes. 09:27

Q. You're there? 09:27

A. I'm there. 09:27

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Q. And then in Beigi Exhibit 28, which 09:27
is your reply declaration of the '732 patent, 09:27
you start on page 5, paragraph 12 with your 09:27
understanding. 09:27
Correct? 09:27
A. Yes. 09:27
Q. So in paragraph 108, Mr. Zatkovich 09:27
says, "Claims 1, 11, 18 require the claimed 09:27
automation process to execute a functionality of 09:27
a computer program by simulating a sequence of 09:27
interactions using a displayed user interface of 09:27
the computer program." 09:27
Do you agree or disagree with that 09:27
statement? 09:27
You should have the patent right 09:28
next to you. 09:28
A. So in 1B of the claim, it talks 09:30
about a displayed user face of a computer 09:30
program and then it says that -- 09:30
Q. You are referring to where it says, 09:30
"to utilize a displayed user interface of a 09:30
computer program to simulate a sequence of 09:30
actions of the displayed user interface of the 09:30
computer program"? 09:30

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A. And execute the functionality of the computer program. 09:30

MS. NGUYEN: Objection, form. 09:30

A. I'm reading out of the -- so let me just read the whole paragraph because it's important for context. 09:30

Q. I'm not going to stop you from reading, but my question was only do you agree or disagree with what Mr. Zatkovich said? 09:30

MS. NGUYEN: Objection form. 09:30

Q. In paragraph 108, I'm sorry -- yeah, paragraph 108? 09:30 09:31

A. So the claims 1, 11 and 18, I'm just looking at is -- and I'm assuming -- and I remember those two follow basically. 09:32

So they require a claim automation -- this is Mr. Zatkovich's statement -- process to execute the functionality of a computer program by simulating a sequence of interactions using a displayed user interface of a computer program. 09:32

So yes, that part is in the claims. 09:32

Q. So you agree with the accuracy of 108? 09:32

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A. I agree with the first sentence of 09:32
this paragraph. 09:32
Q. There is only one sentence. That's 09:32
the whole paragraph, right? 09:32
A. Yes. 09:32
Q. Okay. 09:32
So in paragraph 109, he refers to 09:32
paragraph -- I'm sorry, column 5, line 6 of the 09:32
'732 patent. If you could turn there. 09:33
Do you see where it says in column 09:33
5, "The target system, generally referred to as 09:33
the computer program, may be," and then it lists 09:33
a bunch of things, right? 09:33
MS. NGUYEN: Objection, form. 09:33
A. I see that paragraph, yes. 09:34
Q. Do you agree that the '732 patent, 09:34
when it says, "The target system generally 09:34
referred to as the computer program is telling 09:34
the reader that it is referring to the target 09:34
system as the computer program"? 09:34
MS. NGUYEN: Objection, form. 09:34
A. So that's one example in the 09:35
specification and in my declaration. I've 09:35
listed other examples where the computer program 09:35

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is used basically -- there is no definition in 09:35
the patent for the computer program as 09:35
Mr. Zatkovich is alleging that there is. 09:35
The patent does not give any new 09:35
definition or doesn't define a computer program 09:35
by itself. Computer program is a well known 09:35
established phrase and it's basically a set of 09:35
instructions that are executed on a computer. 09:35
So using a computer program in the 09:35
claims, the specifications are giving an 09:36
example, and I provide examples in my 09:36
declaration, where it supports that basically it 09:36
is -- this is a computer program and that 09:36
computer program is a -- it's the generic set of 09:36
instructions and not necessarily, you know, the 09:36
target system. 09:36
Q. Okay. I will come back and talk 09:36
about all your other opinions, but all I asked 09:36
is do you -- do you agree that the '732 patent, 09:36
when it states that the target system generally 09:36
referred to as the computer program is telling 09:36
the reader that it is referring to the target 09:36
system as the computer program? 09:36
And all I want to know is yes, I 09:36

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agree, no, I don't, or I can't answer? 09:36

MS. NGUYEN: Objection, form. 09:36

A. I agree that the patent states that 09:36
in the specification -- that column 5 of the 09:36
patent states, "The chatbot may implement a 09:36
natural language interface such as a text-based 09:37
conversation, an oral conversation or the like. 09:37
The target system generally referred to as the 09:37
computer program may be a website, a web-based 09:37
system, a native mobile application, example 09:37
executed in a protected sandbox, a desktop 09:37
application example executed in a process of a 09:37
non-sandbox based operating system or the like. 09:37

"The target system may have a user 09:37
interface such as a graphical user interface and 09:37
the user may utilize in order to activate the 09:37
functionality of the target system." 09:37

Q. So you understand that the target 09:37
system may have a user interface just like in 09:37
the claim computer program, right, for the '732 09:37
patent? 09:38

MS. NGUYEN: Objection, form. 09:38

A. It says, "The target system may have 09:38
a user interface," and I think you stated did 09:38

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have a user interface. 09:38

Q. You understand that the patent is 09:38
teaching that the target system may have a user 09:38
interface in the same manner that the '732 09:38
patent claim 1 has the computer program have a 09:38
user interface, is that correct or incorrect? 09:38

MS. NGUYEN: Objection, form. 09:38

A. The target system may have a user 09:38
interface as well, yes. 09:38

Q. And that is also what you said 09:38
before, the '732 patent claim has the computer 09:38
program with the user interface too, right? The 09:38
graphical user interface? 09:38

MS. NGUYEN: Objection, form. 09:38

Q. Let me rephrase that. 09:39

Claim 1 of the '732 patent says "a 09:39
displayed user interface of a computer program." 09:39
That's what you were discussing earlier, 09:39
correct? 09:39

A. Yes. 09:39

Q. Do you understand that when the 09:39
target system has a graphical user interface, 09:39
that the user may utilize in order to activate 09:39
the functionalities of the target system, if 09:39

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that graphical user interface is displayed, it 09:39
will be -- it would meet the limitation of a 09:39
displayed user interface of a computer program 09:39
as set forth in claim 1 of the '732 patent? 09:39
MS. NGUYEN: Objection, form. 09:39
Q. Dr. Beigi, you're looking at your 09:44
reply declaration right now? 09:44
A. I am, yes. 09:44
MS. NGUYEN: Objection, form. 09:44
Q. Dr. Beigi, I'll read back the 09:44
question to you to make sure you have it in mind 09:44
since it's been a little time since I asked it. 09:44
Do you understand that when the 09:44
target system has a graphical user interface 09:44
that the user may utilize in order to activate 09:44
the functionalities of the target system, that 09:44
the graphical user interface -- and that the 09:44
graphical user interface is displayed, that it 09:45
would meet the limitations of the graphical user 09:45
interface of a computer program as set forth in 09:45
claim 1 of the '732 patent? 09:45
MS. NGUYEN: Same objection. 09:45
A. The patent claim 1 specifically -- 09:45
and we can talk about the other patent claims 09:45

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also -- the claim 1 says "a method for defining 09:46
an automation process." 09:46
So this is the preamble. It starts 09:46
out with the "method for defining an automation 09:46
process." 09:46
In the process of defining an 09:46
automation process, it also says, "Wherein the 09:46
automation process is configured to be invoked 09:46
in response to a conversation of a user with a 09:46
natural language interface." 09:46
The method comprising -- and it 09:46
requires, in the second part, that a computer 09:46
program simulates the sequence of interactions 09:46
with the user, with a displayed user interface 09:46
of a computer program and execute the 09:46
functionality of a computer program. 09:46
So when the computer program, when 09:46
the computer program is the target system, then 09:47
that target system abides by this requirement. 09:47
Q. So your understanding of claim 1 of 09:47
the '732 patent is that a target system with a 09:47
user interface, when it is displayed, would 09:47
meet -- as described in the '732 patent spec, 09:47
would meet the limitations of claim 1, is that 09:47

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correct? 09:47

MS. NGUYEN: Objection, form. 09:47

A. When the target system is considered 09:47
to be the computer program which has a more 09:47
general definition, yes. 09:47

Q. And do you have the same conclusion 09:47
with respect to claim 1 of the '664 patent? 09:47

MS. NGUYEN: Objection, form. 09:47

Q. You have a copy of that in front of 09:47
you? 09:47

A. Can we -- 09:47

Q. Yes, please. 09:47

So my specific question is, so your 09:48
understanding of claim 1 of the '664 patent is 09:48
that a target system with a user interface, when 09:48
it is displayed, would meet, as described in the 09:48
'664 patent spec, would meet the limitations of 09:48
claim 1 of the '664 patent, is that correct? 09:48

MS. NGUYEN: Objection, form. 09:48

Q. Do you understand my question? 09:48

A. I understand. 09:48

So again, the claim is describing 09:50
the whole method, like I said in the previous 09:50
one where it was -- it calls it an automation 09:50

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process, but really describes the 09:50
conversation -- the natural lang -- I mean this 09:50
is one claim you have to read together. 09:50
The natural language input and all 09:50
the things that we talked about before, together 09:50
with -- so the whole thing -- basically it's 09:50
calling that the -- "a computer program," which 09:50
then refers to that as "the computer program" 09:50
has a GUI. And in '664, again, it says "a 09:50
method comprising." 09:51
So now it's encompassing the whole 09:51
system. It's looking at the whole system as 09:51
one. 09:51
And then it says that there is a 09:51
computer program. So basically -- I'm reading 09:51
the second part which is, "determining based on 09:51
the first and second natural language input from 09:51
the user and automation process configured to 09:51
perform an automation of a sequence of 09:51
interactions with a displayed user interface of 09:51
a computer program to simulate user interaction 09:51
with the displayed user interface of the 09:51
computer program." 09:51
So if you, again, assume that a 09:51

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computer program that they are talking about 09:51
here is the target system, which is one possible 09:51
example, then the target system having a GUI 09:51
will be -- will basically abide by the 09:52
limitations of the patent -- of the claim. 09:52
Q. So both claim 1 of the '732 patent 09:52
and claim 1 of the '664 patent, you agree that a 09:52
target system with a user interface which is 09:52
displayed is an example as described in both 09:52
specifications of something that could meet both 09:52
claims, is that correct? 09:52
MS. NGUYEN: Objection, form. 09:52
A. Yes. If it -- it's a special case 09:52
which is if the target system -- we define the 09:52
computer in this case as an example to be a 09:52
target -- the target system, then it meets 09:52
limitation. 09:52
Q. And that's what column 5, line 5 09:52
says when it says that the target system, 09:52
referred to as a computer program, provides an 09:52
example of a computer program in your mind, 09:53
right? 09:53
MS. NGUYEN: Objection, form. 09:53
A. That is one example. Of course 09:53

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there are other examples which are not the same. 09:53
So that's -- in the specification, that's one 09:54
example that meets the limitation. 09:54
Q. Can you identify where there is -- 09:54
strike that. 09:54
Earlier you testified that with 09:54
respect to claim 1 of the '732 patent in the 09:54
second part that a computer program simulates 09:54
the sequence of interactions with the user with 09:54
the displayed interface of a computer program 09:54
and executes the functionality of the computer 09:54
program. 09:54
Is it your testimony that it is the 09:54
computer program that simulates the sequence of 09:54
interactions or the automated process 09:54
interacting with the computer program that 09:54
simulates the sequence of actions with the user? 09:54
MS. NGUYEN: Object to form. 09:54
Q. Dr. Beigi, did you understand my 09:54
question? 09:54
A. I'm going to ask you to repeat it. 09:55
I got the gist of it, but I want to read this 09:55
part and then ask you to repeat it for me. 09:55
Q. That's fine. 09:55

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A. May I? 09:55
Q. I just want to make sure you 09:55
understand the question. 09:55
A. I do understand. And I just want to 09:55
read it and ask you to repeat. 09:55
Q. I'm happy to do that. When your 09:55
counsel objects, I need to make sure you 09:55
understand the question. That's why I'm asking. 09:55
A. Thank you. 09:55
Okay, would you mind now repeating 09:57
the question. I'm sorry. 09:57
Q. Sure. 09:57
So we were referring to claim 1 of 09:57
the '732 patent and I want to know if it is your 09:57
testimony that it is the computer program in 09:57
claim 1 of the '732 patent that simulates the 09:57
sequence of interactions or if it is the 09:57
automated process interacting with the computer 09:57
program that simulates the sequence of actions 09:57
with the user? 09:57
MS. NGUYEN: Same objection. 09:57
Q. And you understand the question, 09:57
right, Dr. Beigi? 09:57
A. Yes. 09:57

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Q. Okay. 09:57

A. The automation process executes a 09:58
functionality of the computer program, but it 09:58
also says that, "A displayed user interface of a 09:58
computer program to simulate sequence of 09:58
interactions with the displayed user interface 09:58
of the computer program and," and then it 09:58
follows "and execute a functionality of the 09:58
computer program." 09:58

Q. Did you read that correctly? 09:59

A. Yes, let me go back and read it. 09:59

So going from the beginning of the 09:59
important part. "A displayed user interface of 09:59
a computer program," a computer program, "to 09:59
simulate sequence of interactions with the 09:59
displayed user interface of the computer program 09:59
and execute a functionality of the computer 09:59
program." 09:59

So the automation process is 09:59
executing the functionality of the computer 09:59
program. 09:59

Q. So with all due respect, I think you 09:59
didn't start at the important part. 09:59

If you start where the wherein 09:59

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clause is. What does it say? It says, "The 09:59
automation process is configured to utilize the 09:59
display user interface of the computer program 09:59
to simulate the sequence of interactions with 09:59
displace user interface of the computer 09:59
program." 09:59
Is it your understanding that the 09:59
automation process is what is simulating the 09:59
interaction with the displayed user interface of 10:00
the computer program or is it the computer 10:00
program itself which is simulating the 10:00
interaction with the user? 10:00
MS. NGUYEN: Objection, form. 10:00
A. So this is about configuring the 10:00
automation process. It's associating the 10:00
conversation that we had in the previous part 10:00
with the automation process wherein, so within 10:00
that scope, which is the association of the 10:00
conversation that we had to collect information 10:00
in the previous part with the automation 10:00
process, wherein the automation process is 10:00
configured to utilize a displayed user interface 10:00
of a computer program to simulate sequence of 10:00
interactions with the displayed user interface 10:00

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of the computer program and execute a 10:00
functionality of the computer program. 10:00
So a functionality of the program is 10:00
executed by the automation process and the 10:01
automation process is configured to utilize a 10:01
displayed user interface of a computer program. 10:01
So that a computer program can be 10:01
anything, but the execution is being done by the 10:01
automation process. 10:01
Does that answer your question or am 10:01
I -- 10:01
Q. Well, when the automation process is 10:01
utilizing the displayed user interface to 10:01
simulate the sequence of interactions, is it 10:01
your understanding that a POSITA would 10:01
understand that the automation process is doing 10:01
the simulation that is -- is performing the 10:01
simulation of the interaction or is it the 10:01
computer program with the displayed user 10:01
interface that is performing the simulation? 10:01
MS. NGUYEN: Objection, form. 10:02
A. Here is where the subtlety comes in 10:02
because a computer program itself may include 10:02
the automation process. Because this is talking 10:02

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about the whole process and that's why I'm -- I 10:02
want to be very exact about this. 10:02
So when it says a computer program, 10:02
depending on what you define that a computer 10:02
program to be, then you have the automation 10:02
process executing a functionality of a computer 10:02
program. 10:02
Q. I'm sorry, what's the "then" then? 10:02
A. I'm sorry? 10:02
Q. When is the "then"? 10:02
A. At the publishing time. When -- 10:02
after you publish and you execute. 10:02
Q. I'm confused by your answer. 10:02
So I just want to understand. 10:02
Assume you have an automation process and assume 10:02
that you have some computer program with a 10:02
displayed user interface and they are two 10:02
different pieces of software, okay? 10:02
A. Yes. 10:02
MS. NGUYEN: Objection, form. 10:02
Q. Which piece of software is utilizing 10:02
the displayed user interface of the computer 10:03
program to simulate the sequence of interactions 10:03
with the displayed user interface of the 10:03

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computer program? Is it the automation process 10:03
or is it the computer program? That is all I'm 10:03
trying to understand. 10:03
MS. NGUYEN: Objection, form. 10:03
Q. Do you understand my question? 10:03
A. I do, but I'm saying when it says a 10:03
computer program, that automation process 10:03
possibly can be part of a computer program as 10:03
well. 10:03
That's why I'm saying there is no -- 10:03
necessarily in this claim, the way it's written, 10:03
there is not necessarily a separation between a 10:03
computer program and an automation process. 10:03
That's what I am trying to get across. 10:03
Q. I'm asking you to consider the 10:03
example where it is considered separate. How do 10:03
you understand the simulation is being 10:03
performed? Is it being performed by the 10:03
automation process or by the computer program? 10:03
MS. NGUYEN: Objection, form. 10:03
A. In the hypothetical example where a 10:03
computer program is separate from the automation 10:03
process -- but of course has to be aware of it 10:03
because if it's not aware, then this whole 10:04

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associating thing, right, if it is not aware, it 10:04
can't do anything, right? So given that they 10:04
are separate, given your hypothetical example, 10:04
then it's the automation process that's 10:04
executing the simulation. 10:04
Q. Are you sure that the computer 10:04
program has to be aware of the automation 10:04
process instead of the automation process being 10:04
aware of the computer program -- 10:04
MS. NGUYEN: Objection, form. 10:04
Q. -- for the purposes of claim 1 of 10:04
the '732 patent? 10:04
A. Can I ask for you to please 10:04
repeat -- I'm pointing to the court reporter -- 10:04
would you please repeat my answer because I 10:04
don't think I said that. 10:04
(Record read) 10:05
A. Okay. 10:05
I meant, I meant to say -- it's in 10:05
my mind that's what I thought I said. I meant 10:05
to say that the automation process has to be 10:05
aware of the computer program because otherwise 10:05
it won't be able to simulate. 10:05
Q. And in fact, one of the whole points 10:05

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of the three patents-in-suit is that you may not 10:05
have access to a back-end system of the computer 10:05
program or the target system, so that way you 10:05
want the automation process to be able to 10:05
interact with the displayed user interface, 10:05
right? 10:05
MS. NGUYEN: Objection, form. 10:05
A. You used too many -- too many 10:06
different terms here. 10:06
Q. If one of the points -- 10:06
A. The back-end and all of this stuff 10:06
we bring in so many -- 10:06
Q. I'll rephrase. 10:06
So you understand one of the 10:06
technical problems being addressed is that 10:06
target systems may change over time, right? 10:06
A. Target systems may change over time. 10:06
Yes. 10:06
Q. And so if you relied upon the API, 10:06
that could be problematic when the target system 10:06
changes according to the three patents being 10:06
challenged, right? 10:06
MS. NGUYEN: Objection, form. 10:06
A. That's not a blanket statement. 10:06

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So if you relied on API, depending 10:06
on whether the API allows for the changes, so 10:06
that's not -- what you are making, the 10:06
allegation you are making, if you have an API 10:06
then you can't keep up with changes, that's not 10:06
true. 10:06
Q. No, I'm saying that the patent 10:06
asserts that a problem is that as a target 10:06
system changes, using an API could be 10:06
problematic? That's a technical problem that 10:07
the patent asserts, right? 10:07
MS. NGUYEN: Objection, form. 10:07
A. I don't think that the patent 10:07
asserts that using an API is not going to allow 10:07
you to keep up with changes. 10:07
Q. Okay. 10:07
A. I think what the patent -- and just 10:07
in general, the patent is talking about using an 10:07
API by the user is going to be difficult, but 10:07
APIs are used even -- I -- I understand that 10:07
even within this patent, internally. 10:07
So you can't just say because you 10:07
use an API that you cannot keep up with a system 10:07
that's -- whose API you are using because the 10:07

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API depends on how flexible that API is. 10:07

Q. If you look at column 5 of the '732 10:08
patent, line 29, I believe you called this in 10:08
your report, but you leave off the front part., 10:08
it says -- 10:08

A. What part, you say 5, what? 10:08

Q. Column 5, line 29, "It may be 10:08
desired to enable defining the chatbots without 10:08
the need of using dedicated APIs, programming 10:08
languages or the like. It may be desired that 10:08
nonprogrammers may be able to define the 10:08
automations that are invoked by the chatbots." 10:08
Right? 10:08

A. Where does that say that using APIs 10:08
is -- using APIs is not going to allow for the 10:08
target system change? That's what you are 10:08
question was. 10:08

Q. Now I'm asking you a new question. 10:08
I'm asking you, do you see where 10:08
says at column 5, line 29, "It may be desired to 10:08
enable defining the chatbots without the need of 10:08
using dedicated APIs, programming languages or 10:08
the like. It may be desired that the 10:08
programmers may be able to define the automation 10:08

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that are invoked by the chatbots"? 10:09

A. No, nonprogrammers. 10:09

Q. Nonprogrammers, thank you. 10:09

Do you see is that? 10:09

A. Yes, I see that. 10:09

Q. Does that desired behavior relate at 10:09
all to the claims of the '732 patent? Claim 1 10:09
in particular? 10:09

MS. NGUYEN: Objection, form. 10:09

A. It -- I mean, it is in the 10:09
specifications and it is -- it is part of the 10:09
patent. 10:09

So -- but going back, again, I know 10:09
it is a new question, but going back to your 10:09
previous question, this doesn't say that you 10:09
cannot use APIs because you don't want to use 10:09
APIs because a target system may change. That's 10:09
what your statement was. 10:09

And nowhere here I see that. It 10:09
just says it's easier. That's what I said -- 10:09

Q. Are you sure you don't see that 10:09
anywhere? 10:09

MS. NGUYEN: Object. 10:10

Q. Do you want to keep reading? 10:10

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If you look at column 5, line 50, it 10:10
says, "Another technical problem may be enabling 10:10
defining the automation process in a manner that 10:10
enables them to be implemented even if changes 10:10
are performed to the underlying platform." 10:10
Do you see that? 10:10
A. Yes. 10:10
Q. Then it goes on and it talks about 10:10
technical solutions after that? 10:10
A. Yes, but you made a blanket 10:10
solution, blanket statement saying that you 10:10
don't want to use API because then you will not 10:10
be able to keep up with changes in the target 10:10
system. 10:10
I am disagreeing with that blanket 10:10
statement. This is not what it says. It says 10:10
there may be cases that your API -- and my 10:10
response was that depends on your flexibility of 10:10
your API. There may be cases -- may I continue? 10:10
There may be cases where the API is 10:10
rigid and the system changes and you cannot keep 10:10
up. But nowhere here -- and it shouldn't -- 10:10
nowhere here does it say -- and it shouldn't -- 10:10
that using APIs will not allow you to keep up 10:10

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with target systems. 10:11

Q. So if you look at column 6, at the 10:11
top, do you see where it says "defining the 10:11
automation process"? 10:11

A. Yes. 10:11

Q. Okay, I want you to read into the 10:11
record starting at "defining the automation 10:11
process" until the end of that paragraph what it 10:11
says and then I'm going to ask you to explain 10:11
what you understand that paragraph to mean. 10:11

A. Okay. "Defining the automation 10:11
process based on performing actions in the GUI 10:11
enabled the automation process to perform any 10:11
functionality that the user can perform without 10:11
relying on dedicated APIs and without requiring 10:11
any time -- any line of code." 10:11

Q. Line. 10:11

A. "The parameters of the conversation, 10:11
as well as the flow of the automation process 10:11
may be defined using a point-and-click editor 10:12
and" -- I'm sorry, "or other user interface that 10:12
can be used by any nonprogrammer user." 10:12

Q. Right. 10:12

And what I want you now to do is 10:12

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explain how that paragraph that you just read 10:12
into the record from column 6, line 3 through 10 10:12
of the '732 patent relates, if at all, to claim 10:12
1 of the '732 patent? 10:12
MS. NGUYEN: Objection, form. 10:12
A. You want me to go through every part 10:12
of it? There is quite a bit here in one 10:12
paragraph. 10:13
Q. Whatever is in that paragraph versus 10:13
whatever you think it relates to in claim 1, 10:13
take your time. I would want you to give a full 10:13
and complete understand -- your full and 10:13
complete understanding of how the paragraph in 10:13
column 6, starting at line 3 and going on to 10:13
line 10 relates to the claimed invention in 10:13
claim 1 of the '732 patent if at all. 10:13
And you understand my question, 10:13
right? 10:13
A. I do. 10:13
Okay, defining the automation 10:13
process based on performing actions goes to 10:13
automation process is configured to utilize -- 10:14
Q. Does it also go to -- 10:14
A. -- based on performing actions in 10:14

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the GUI configured to utilize a displayed user 10:14
interface on the computer program, enables the 10:14
automation process to perform any functionality 10:14
that the user can perform to simulate sequence 10:14
of interactions with a displayed user interface 10:14
of a computer program without relying on API. 10:14
I don't see that in the claim 10:15
without the use of API in this one, claim 1. 10:15
Q. You don't think that informs how 10:15
claim 1 requires defining the automation 10:15
process? 10:15
MS. NGUYEN: Objection, form. 10:15
A. That's a hidden thing -- you're 10:15
asking me whether this is present in the claim? 10:15
Q. Yes, I'm asking you whether 10:15
paragraph from column 6, lines 3 through 10 10:15
informs your understanding in claim 1 of 10:16
defining an automation process. 10:16
A. What I am saying is that in claim 1, 10:16
the automation process says "Wherein the 10:16
automation process is configured to utilize a 10:16
displayed user interface of a computer program 10:16
to simulate sequence of interactions with a 10:16
displayed user interface and execute the 10:16

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functionality of the computer program wherein 10:16
the automation process is a parameterized 10:16
automation process depending on the one or more 10:16
parameters." 10:16
This paragraph says nothing about 10:16
the APIs. It says nothing about how you 10:16
configure the automation process. You could sit 10:16
down and write a code as far as this paragraph 10:16
is concerned in the claim. 10:16
Q. Does that paragraph inform your 10:16
understanding of what the preamble means as a 10:16
method for defining an automation process? 10:16
In other words, when you are 10:17
defining an automation process as required in 10:17
the preamble, does it -- that automation process 10:17
have to meet the configuration limitations that 10:17
you just read from claim 1? 10:17
MS. NGUYEN: Objection, form. 10:17
A. The preamble that you are referring 10:17
to says "a method for defining an automation 10:17
process wherein the automation process is 10:17
configured," nothing about APIs yet, "to be 10:17
invoked," nothing about API, response -- "in 10:17
response to a conversation of a user and natural 10:17

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language interface," nothing about any API, "the 10:17
method comprising," nothing about API, "defining 10:17
the conversation" -- I'm going to read through 10:17
the whole claim and there is nothing about an 10:17
API here. 10:17
Q. I hear what you are saying, but that 10:17
wasn't my question. 10:17
A. But you're asking me to take every 10:17
part of this paragraph. 10:17
Q. No, I asked you a different 10:17
question. Okay? 10:17
A. Okay. 10:17
Q. The question I asked you is, does 10:17
the paragraph on paragraph -- what I want to 10:17
know is you understand that in the preamble, it 10:18
requires defining an automation process, claim 1 10:18
of the '732 patent? 10:18
MS. NGUYEN: Objection, form. 10:18
A. Yes, method for defining an 10:18
automation process. Therefore, it requires -- 10:18
it's a method for defining it. 10:18
Q. Right. And in that method, an 10:18
automation process is being defined? 10:18
A. In that method, the automation -- 10:18

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that's what I am trying to tell you. It says 10:18
automation process, but it's actually lumping 10:18
together the conversation and the natural 10:18
language that we talked about and the 10:18
automation -- now, so the thing is which is the 10:18
automation process -- and it is unclear in this 10:18
claim, right? 10:18
So if you -- may I continue? You 10:18
have asked me a question and I want to be clear, 10:18
perfectly clear about it. 10:18
Q. Okay. 10:18
A. So you're asking me whether this is 10:18
about configuring an automation process. It is 10:19
about configuring an automation process. 10:19
It doesn't give the -- it doesn't 10:19
give you any details in the claim on how you 10:19
configure the automation process. 10:19
Q. So do you understand that the claim 10:19
requires that an automation process be defined; 10:19
yes or no? 10:19
A. Yes. 10:19
Q. Do you understand that that 10:19
automation process has to be configured to meet 10:19
certain limitations, whatever they are? 10:19

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A. It should be configured -- 10:19
MS. NGUYEN: Objection, form. 10:19
A. -- to utilize a displayed user 10:19
interface and so on that we read in the second 10:19
paragraph. 10:19
MS. NGUYEN: Can we take a break? 10:19
MR. MACEDO: As soon as I'm done 10:19
with this line. 10:19
Q. And do you understand that the 10:19
defining of the automation process includes 10:19
defining the automation process to be configured 10:20
in the way the claim says that it should be 10:20
configured? 10:20
MS. NGUYEN: Objection, form. 10:20
A. It includes configuring the 10:20
automation process. Defining the automation 10:20
process includes configuring the automation 10:20
process. 10:20
Q. So if you were programming the 10:20
automation process, however you're going to 10:20
define the automation process, do you have to 10:20
have something which is interacting with the 10:20
displayed user interface of the computer program 10:20
as part of that automation process? 10:20

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MS. NGUYEN: Objection, form. 10:20

A. I'm sorry, what do you mean do I 10:20
have to have something that -- 10:20

Q. In other words, do you understand 10:20
that the claim, in requiring that there be an 10:20
automation process defined -- 10:20

A. Configured. Defined in the 10:20
beginning. 10:20

Q. -- well, defined in the preamble, 10:20
that that includes defining the automation 10:20
process so that it can be configured to meet the 10:21
configured limitations of the associating step? 10:21

MS. NGUYEN: Objection, form. 10:21

A. Defining an automation process 10:21
includes configuring the automation process to 10:21
meet certain limitations. 10:21

Q. As set forth in the associating step 10:21
of claim 1? 10:21

A. Yes. 10:21

MS. NGUYEN: Objection, form. 10:21

MR. MACEDO: Okay. Counsel has 10:21
asked for a break. So let's go ahead and 10:21
take a ten-minute break. 10:21

It is currently 10:21. Let's see if 10:21

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we can start at 10:30. Okay. Thank you. 10:21

A. Yes. 10:21

(Recess) 10:34

Q. Back on the record. 10:34

A. Yes. 10:34

Q. Dr. Beigi, are you capable of 10:34
continuing to testify truthfully honestly and 10:34
completely right now? 10:34

A. Yes. 10:34

Q. So in column 5 of the '732 patent, 10:34
we identified before where it said, "Another 10:35
technical problem may be to enable defining 10:35
automation processes in a manner that enables 10:35
them to be implemented even if changes are 10:35
performed in the underlying platform." 10:35

Do you see that? 10:35

A. Yes. 10:35

Q. Do you understand that the technical 10:35
problem is relevant for all three patent claims, 10:35
patents? 10:35

MS. NGUYEN: Objection, form. 10:35

A. After we have to look at the other 10:36
patents to see if it's listed as one of the 10:36
technical problems. Is that what you were 10:36

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asking? 10:36

(Reporter clarification) 10:36

A. To see if it's listed as one of the 10:36
technical problems they were looking into. 10:36

Q. I'll represent to you that it's in 10:36
all three disclosures, but you are welcome to 10:36
look if that makes you feel better. 10:36

A. If it is in all conditional -- if it 10:36
is in all three disclosures, then it is a 10:37
technical problem. 10:37

Yes. So what is the question? 10:37

Q. It's a technical problem that the 10:37
claims of each of the three patents are sought 10:37
to address in your opinion? 10:37

MS. NGUYEN: Objection, form. 10:37

A. It's a technical problem of interest 10:37
as listed in the specifications. 10:37

Q. Okay, so let's look at the '732 10:37
patent, the claims of the '732 patent. 10:37

Do you understand that one of the 10:37
technical problems it is seeking to address is 10:37
"another technical problem may be to enable 10:37
defining automation processes in a manner that 10:37
enables them to implement even if changes" -- 10:37

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A. Sorry, what paragraph are you 10:37
reading? 10:37
Q. I'm reading the exact same sentence. 10:37
A. Okay, I was on the sentence. 10:37
Q. So I want to know, with respect to 10:37
claim 1 of the '732 problem, do you understand 10:37
that the technical problem that it is addressing 10:37
is the technical problem set forth on column 5, 10:37
lines 49 through 52, where it states, "Another 10:38
technical problem may be to enable defining 10:38
automation processes in the manner that enables 10:38
them to be implemented even if changes are 10:38
performed to the underlying platform"? 10:38
A. Yes, I see that. 10:38
MS. NGUYEN: Objection, form. 10:38
A. And then the question? 10:38
Q. And do you agree that that technical 10:38
problem as set forth on column 5 of the '732 10:38
patent, lines 49 through 52, is a technical 10:38
problem that claim 1 of the '732 patent has 10:38
sought to address? 10:38
MS. NGUYEN: Objection, form. 10:38
Q. Do you understand my question? 10:38
A. I understand. But what I need 10:38

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clarification is when you say "sought to 10:38
address," how is that different from actually 10:38
addressing? 10:38
Q. Well, I -- 10:38
A. I need to understand the question. 10:38
"Sought to address." 10:39
Q. You don't have to agree that it did 10:39
a good job; you just have to agree that's what 10:39
it is trying to solve. 10:39
A. They want to do that? 10:39
MS. NGUYEN: Objection to form. 10:39
Q. That's the distinction I'm drawing 10:39
in the question for your clarification. 10:39
A. So claim 1 doesn't say how that's 10:39
done if that's -- right, it doesn't say how it's 10:39
done. 10:39
Q. We will come back to that. I'm not 10:39
asking how. 10:39
I'm asking is that a problem that 10:39
you understand, in your expert opinion, that is 10:39
being sought to be addressed by claim 1 of the 10:39
'732 problem -- patent? 10:39
MS. NGUYEN: Objection, form. 10:39
A. The thing I'm saying is that claim 1 10:39

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is just seeking -- claim 1, you're asking me to 10:39
connect the two, but claim 1 by itself is 10:39
seeking to define an automation process, which 10:39
is required by the technical problem, but also 10:40
configuring the automation process and what the 10:40
technical problem is asking for is to enable 10:40
defining the automation process, which is that 10:40
process that we are looking at, in a manner that 10:40
enables them to be implemented even if changes 10:40
are performed to underlying platform. 10:40
And that is not handled with claim 1 10:40
because it doesn't say how to do that. That's 10:40
what I am saying. 10:40
Q. But if -- so your opinion is that 10:40
the technical problem in column 5 at lines 49 10:40
through 52 is not a technical problem that is 10:40
sought to be addressed in claim 1 of the '732 10:40
patent? 10:40
MS. NGUYEN: Objection, form. 10:40
A. I am saying that because they say 10:40
this is one of the technical problems in the 10:41
patent. So in the specifications, this is a 10:41
technical problem that they're interested in, 10:41
the authors. 10:41

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Claim 1, however, does not address 10:41
the final part of that, which is how do you 10:41
implement in the manner that enables them to be 10:41
implemented even if the changes are performed on 10:41
the underlying platform. 10:41
The how part it doesn't say, but it 10:41
says that it wants to do that. So in terms of 10:41
"sought," that's why I want to make sure that 10:41
"sought" part -- 10:41
Q. So is it correct that your opinion 10:41
is that the '732 patent, claim 1, may seek to 10:41
solve the technical problem, but you don't see 10:41
how it solves the technical problem? Is that 10:41
your testimony? 10:41
MS. NGUYEN: Objection, form. 10:41
A. Claim 1, I don't see how it solves 10:41
it, yes. 10:41
Q. So you see the next paragraph that 10:42
starts on column 5, line 62, offers a technical 10:42
solution -- and we will go into what that is in 10:42
a second. It says "one technical solution," do 10:42
you see that? 10:42
A. I'm sorry -- 10:42
Q. Back at column 5. 10:42

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A. 62, yeah. 10:42

Q. And that technical solution involves 10:42
two parts, and I'm going to focus on the second, 10:42
but I don't want to ignore the first. 10:42

The first part is dealing with a 10:42
natural language interface, and then the second 10:42
part is that the automation process may be 10:42
executed in manner that manipulates the GUI of 10:42
the target system in a similar manner to the 10:42
manner in which the user operates. As a result, 10:42
the definition of the automation process may be 10:42
defined by nonprogrammers. 10:42

Do you see that? 10:42

A. Yes. 10:42

Q. Now, you understand that that 10:42
solution, at least to the extent it's talking 10:42
about manipulating the GUI of the target system 10:42
when the computer program is a target system, is 10:43
a solution that is incorporated into claim 1, 10:43
correct? 10:43

MS. NGUYEN: Objection to form. 10:43

Q. Of the '732 patent? 10:43

A. It is still a description of a 10:43
solution but not the solution because the 10:43

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solution would tell you how it's done. There is 10:43
nothing -- it still doesn't say how it's done. 10:43
Q. So you don't think that manipulating 10:43
the GUI of the target system in a manner similar 10:43
to which the user operates is a solution to the 10:43
technical problem in your opinion, right? 10:43
A. What I said is that it is -- in 10:43
general, the solution has that form, but there 10:43
is no detail here what you read. There is no 10:43
detail on how that actual problem is solved. 10:43
Q. We will come back to that. 10:43
A. Okay. But that's -- just to be 10:43
clear, yeah. 10:43
Q. But putting aside whether you agree 10:43
with the technically it does or doesn't solve 10:44
it, your understanding or a POSITA's 10:44
understanding -- let me rephrase that. 10:44
As an expert, you understand that a 10:44
POSITA reading the '732 patent would understand 10:44
that there is a technical problem posed by the 10:44
'732 patent of enabling defining an automation 10:44
process in a manner that enables him to 10:44
implement even if changes are performed in the 10:44
underlying platform, and that part of the 10:44

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technical solution to that problem includes the 10:44
automation process to be executed in a manner 10:44
that manipulates the GUI of the target system in 10:44
a manner similar to the manner in which the user 10:44
operates. As a result, the definition of the 10:44
automation process may be defined by 10:44
nonprogrammers? 10:44
MS. NGUYEN: Objection, form. 10:44
A. That technical solution, that 10:44
teaches -- the second part -- we didn't read the 10:44
full description of the first part, but the 10:45
second part is covered under 1B and -- well, in 10:45
terms of the actual capability. 10:45
Then it says execute a functionality 10:45
on of a computer program. Well, it says execute 10:45
a functionality of the computer program. Let me 10:45
read the rest of it because, again, I've read it 10:45
many times, just one more time, because a 10:45
functionality of a computer program is a 10:45
parameterized automation process depending on -- 10:45
so it says that it can simulate a sequence of 10:45
interactions with the displayed user interface, 10:45
the, for example, the GUI, of the computer 10:45
program and execute a function -- and execute a 10:45

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functionality. 10:45

So it can manipulate the GUI and it 10:46
can execute a functionality. They could be one 10:46
or separate because it says -- the way it's 10:46
written it's "and execute a functionality of the 10:46
computer program." 10:46

Q. It has to be both? 10:46

A. It has to be able to -- 10:46

MS. NGUYEN: Objection, form. 10:46

A. -- interact with the displayed user 10:46
interface of the computer program and execute a 10:46
functionality of the computer program. Not 10:46
necessarily these two would be the same. But 10:46
should have -- be able to do both. 10:46

Q. Right. And the first one where 10:46
you're interacting, that is what they're talking 10:46
about executing in a manner that manipulates the 10:46
GUI of the target system in a similar manner to 10:46
the manner in which the user operates. Right? 10:46
That's the simulating the user portion? 10:46

MS. NGUYEN: Objection, form. 10:46

A. That's an example. That's an 10:47
example. 10:47

Q. And then when you go back to the 10:47

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paragraph we were reading before at the top of 10:47
column 6, it says, "Defining the automation 10:47
process based on performing actions in the 10:47
GUI" -- and that's what we were just talking 10:47
about the simulation steps. 10:47
A. Sorry, let me find it. 10:47
Q. The first sentence on column 6 at 10:47
line 3, "Defining the automation process based 10:47
on performing actions in the GUI," that's the 10:47
simulation process, right? 10:47
MS. NGUYEN: Objection, form. 10:47
A. "Defining the automation process 10:47
based on performing actions in the GUI enables 10:47
the automation process" -- 10:47
Q. I want you to focus on the first 10:47
part, "defining the automation process"? 10:47
A. I haven't finished the sentence yet. 10:47
Q. I'm not asking you to finish the 10:47
sentence, I'm -- 10:47
A. "Defining the automation process." 10:47
Q. Right. Based on performing actions 10:47
in the GUI. When it says, "Based on performing 10:47
actions in the GUI," that's referring to 10:47
manipulating the GUI of the target system in a 10:47

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manner similar to the manner in which the user 10:47
operates. 10:48
Do you agree? 10:48
MS. NGUYEN: Objection, form. 10:48
A. Defining an automation process based 10:48
on performing actions in the GUI enables the 10:48
automation process to perform any functionality 10:48
that the user can perform. 10:48
So based on performing actions in 10:48
the GUI, enables the automation process to 10:48
perform any functionality that the user can 10:48
perform without relying on dedicated APIs and 10:48
without requiring any line of code, yes. 10:48
Q. And when it's talking about based on 10:48
performing actions in the GUI, it's talking 10:48
about the portion of claim 1 where the 10:48
automation process is be -- it utilizes the 10:48
displayed user interface of the target system to 10:48
simulate the -- to simulate sequence of 10:49
interactions with the displayed user interface 10:49
of the computer program. Right? 10:49
MS. NGUYEN: Objection, form. 10:49
A. So it's a little unclear here. It 10:49
says "defining the automation process," that's a 10:49

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definition, "based on performing actions in the 10:49
GUI," in the GUI. So you perform actions on the 10:50
GUI to define your automation process, you agree 10:50
with that, that's what I read, right? 10:50
Defining the automation process 10:50
based on performing actions on the GUI. That 10:50
means performing actions on the GUI allows you 10:50
to define an automation process. 10:50
Enables automation process, so we 10:50
have used the GUI to define the automation 10:50
process. It allows us or enables us or enables 10:50
the automation process to perform any 10:50
functionality the user can perform. 10:50
So up to here, we are using a GUI to 10:50
define an automation process using the GUI, 10:50
define an automation process so that it would 10:50
enable the automation process to perform any 10:50
functionality the user can perform. 10:50
So here, any functionality that the 10:50
user can perform would be that execute part that 10:51
we looked at, the automation process can 10:51
execute -- sorry, let me go back and execute a 10:51
functionality of the computer program. 10:51
Q. So -- would you agree that when the 10:51

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claim says that the automation process is 10:51
configured to utilize the displayed user 10:51
interface of the computer program to simulate a 10:51
sequence of interactions with the displayed user 10:51
interface of the program and that it would be an 10:51
example of performing actions on the GUI as is 10:51
reflected in column 6 of the '732 patent on 10:51
lines 3 and 4? 10:51
MS. NGUYEN: Objection, form. 10:51
A. Well, I mean, this is really telling 10:51
you -- 63 is really telling you how you are 10:52
defining the automation process which is based 10:52
on performing actions on the GUI. 10:52
So you are using GUI to define your 10:52
automation process. It's a general, general -- 10:52
right, in general, you are using a GUI to define 10:52
your automation process. You can think of many, 10:52
many ways you can do -- use the GUI to perform. 10:52
Q. And claim 1 gives an example of how 10:52
you use the GUI to perform the automation 10:52
process, right, in the associating step? 10:52
MS. NGUYEN: Objection, form. 10:52
A. So the claim 1 says that the 10:52
automation process can interact with the GUI. 10:52

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Here we are saying -- 10:52

Q. It does interact? 10:52

A. It does, but here what 63 is saying 10:52
is that you're defining the automation -- this 10:52
is about the definition. You're defining the 10:52
automation based on performing actions on the 10:53
GUI. 10:53

So performing actions on the GUI, 10:53
any action on the GUI to define it, you can 10:53
perform any action. It doesn't specify that -- 10:53
it doesn't state here because we need to see the 10:53
mimicking, the copying, right, it doesn't say 10:53
that specifically here. 10:53

Here it says define the 10:53
automation process based on performing actions 10:53
on the GUI. use the GUI to perform define the 10:53
automation process. Defining the automation 10:53
process has many steps. 10:53

Q. So you don't think that to perform 10:53
any functionality that the user can perform is 10:53
the mimicking provided in the claim 1 of the 10:53
'732 patent? 10:53

MS. NGUYEN: Objection, form. 10:53

A. I think it is more general than 10:53

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that. Because if it can -- it says execute any 10:53
functionality in the claim. 10:53
And here, also, it's basically 10:53
saying the same thing. It says enables the 10:53
automation process to perform any functionality 10:54
that the user can perform. These two parts are 10:54
exactly covered, right? They are -- 10:54
Q. So you -- 10:54
A. So the part where it says the 10:54
automation process -- enables the automation 10:54
process to perform any functionality that the 10:54
user can perform maps to the second part of the 10:54
"and" phrase which is execute a functionality of 10:54
a computer program because it says in the past 10:54
that the computer program is what the user can 10:54
interact with. 10:54
And -- but I'm talking about the 10:54
first part. The first part is more ambiguous 10:54
because the first part says defining the 10:54
automation process based on performing actions 10:54
on the GUI. You perform actions on the GUI all 10:54
the time to do anything. Enables the automation 10:54
process. 10:54
So that is hard to map. That's what 10:54

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I am trying to say. 10:55

Q. So if the board were to agree with 10:55
me that the reference to -- based on performing 10:55
actions in the GUI, would include as an example 10:55
the language in claim 1 where the automation 10:55
process is configured to utilize a displayed 10:55
user interface of the computer program to 10:55
simulate a sequence of interactions with the 10:55
displayed user interface of the computer 10:55
program, would that impact your analysis of 10:55
claim 1? 10:55

MS. NGUYEN: Objection, form. 10:55

A. It doesn't impact my analysis of 10:55
claim 1. We are analyzing this -- I -- my 10:55
analysis of claim 1 is different from the 10:55
specification we are looking at. I'm analyzing 10:55
the specification, not the claim 1. Claim 1, we 10:55
have analyzed it, we have gone through it. 10:55
Quite a bit. 10:55

Q. And your analysis of claim 1 does 10:55
not correspond to the disclosure in column 6 is 10:56
what you are saying right now? 10:56

A. I'm not saying. 10:56

MS. NGUYEN: Objection, form. 10:56

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A. I'm not saying that. 10:56

Q. Clarify -- just to be clear, I want 10:56
you to clarify whether you think that claim 1 of 10:56
the '732 patent is related to -- strike that. 10:56

Let me ask you a different question. 10:56

In the context of column 6, where 10:56
you're -- where we identified a technical 10:56
problem and we were talking about the solution 10:56
in terms of executing in a manner that 10:56
manipulates the GUI of the target system and 10:56
where we are talking about performing any 10:56
functionality of the user, the user can 10:56
perform -- do you understand that that is 10:56
accomplished, according to column 6, the 10:56
paragraph starting on line 3, without relying on 10:56
the dedicated API and without requiring any line 10:57
of code? 10:57

MS. NGUYEN: Objection, form. 10:57

Q. Do you understand my question? 10:57

A. We are going back to the end of 10:57
column 5, that last -- 10:57

Q. To clarify with you, what I am 10:57
saying is that if you start on column 5 where it 10:57
says, "Another technical problem" and continue 10:57

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on to column 6, up to line 10, do you understand 10:57
that those three paragraphs are all related to 10:57
each other? 10:57
A. Let me read IT in context though. 10:57
Q. That's fine. But you understand 10:57
what paragraphs I am referring to? 10:57
A. I do, yes. 10:57
Q. Go ahead. 10:57
A. Okay, so I think in the technical 10:59
solution, as you read the technical solution, 10:59
one important thing is it says that in some 10:59
cases -- this is 55 -- 555 -- "In some cases, it 10:59
may be desired to be able to identify elements 10:59
selected during the definition of the automation 10:59
process, which is described in claim 1, during 10:59
execution thereof. The identification may be a 11:00
nontrivial task if no unique identifiers exist." 11:00
"As may be the case in many 11:00
instances," so many instances we cannot 11:00
identify, it's a hard problem. "Still it may be 11:00
desired to be able to identify such elements 11:00
correctly, so as to apply the actions defined by 11:00
the automation process." Yet we are going to 11:00
try to do that. 11:00

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"One technical solution provided by 11:00
the disclosures subject matter may be to use a 11:00
natural language interface to receive input from 11:00
the user," which we saw before, you are 11:00
receiving input from the user in natural 11:00
language form, "and based thereon," based on the 11:00
receipt of the -- based on the user input, 11:00
"select an automation process to be executed." 11:00
So you're selecting an automation 11:00
process to be executed. 11:01
So by here, at this point, it says 11:01
you already have defined this automation 11:01
processes. Now you are selecting the automation 11:01
process that is related to what the user is 11:01
asking. And then the automation process may be 11:01
executed in a manner that manipulates -- the 11:01
automation process that has already been defined 11:01
that you selected may be -- may be executed in a 11:01
manner that manipulates the GUI of the target 11:01
system in a similar manner to the manner in 11:01
which the user operates. 11:01
So the target, the automation 11:01
process may execute the selected automation 11:01
process which were was selected based on the 11:01

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user natural language input may manipulate the 11:01
GUI, so the automation process may be executed 11:01
in manner that manipulates the GUI of the target 11:02
system in similar -- in a similar manner to the 11:02
manner in which the user operates. 11:02
As a result, definitional automation 11:02
process may be defined by nonprogrammers because 11:02
they are selecting basically a pre-existing 11:02
automation process using natural language just 11:02
to be clear. Because I'm just clarifying as we 11:02
go along. I think it is good for us to both 11:02
have a good understanding. 11:02
And then now we get to defining the 11:02
automation process based on performing actions 11:02
in the GUI enables the automation process to 11:02
perform any functionality that the user can 11:02
perform. 11:02
Defining the automation process, we 11:02
saw that defining the automation process 11:02
includes selection of a pre-existing automation 11:02
process. We just saw that in the previous 11:02
paragraph -- previous paragraph. 11:02
Q. So I want to be clear I just want to 11:03
make sure you didn't make a mistake in what you 11:03

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just said. 11:03

A. Oh, I'm sorry. 11:03

Q. You are saying, you said defining the automation process -- we saw defining automation process includes selection of the pre-existing automation process. 11:03

Are you sure that's what you meant? 11:03

MS. NGUYEN: Object. 11:03

A. No. 11:03

Q. Did you mean defining the conversation or defining the automation process? 11:03

A. No. Selecting an automation process to be executed based on the user's input. So user's natural language input is allowing us to select the automation process. 11:03

Q. As a result of the conversation -- 11:03

A. As a result of the natural language interface. 11:03

Q. Not as a result of defining the automation process? I think you misspoke, I just want to -- 11:03

MS. NGUYEN: Objection to form. 11:03

A. Well, by the automation process, I'm going to the claim language because it says a 11:03

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method for defining an automation process. 11:03
That's the preamble of the claim. It says it's 11:03
a method for defining the automation process and 11:03
in that, it uses the natural language 11:04
conversation limitation that we just talked 11:04
about. 11:04
Q. It defines the natural language 11:04
conversation as part of defining the automation 11:04
process? 11:04
A. It does, doesn't it? 11:04
Q. Right. 11:04
A. Defining a conversation to be 11:04
implemented, to implement. Right. 11:04
Q. But I just want to make sure that 11:04
you meant what you said because what you said 11:04
was defining the automation process, we saw that 11:04
defining the automation process includes 11:04
selection of a pre-existing automation process. 11:04
We saw that in the previous paragraph, previous 11:04
paragraph. 11:04
I think that you meant defining the 11:04
conversation, you saw a defining the automation 11:04
process. 11:04
I just don't understand how you can 11:04

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define the automation process by selecting a 11:04
pre-existing automation process. 11:04
MS. NGUYEN: Objection, form. 11:04
A. What I am saying, is that -- I'm 11:04
reading the paragraphs, from 549 to the end of 11:04
the second paragraph. The only thing that has 11:04
been explained is how you use the user input to 11:05
select. They use the word "select," to select 11:05
an automation process, to be included. That's 11:05
what I am saying, that is all I'm saying. 11:05
Q. And that's part of the natural 11:05
language interface and the natural language 11:05
conversation? 11:05
A. Well, what I am saying is that 11:05
because the claim lumps everything into a method 11:05
of defining automation process, that's a title 11:05
of the claim, right? A method of wherein the 11:05
automation process is configured in such manner, 11:05
right. 11:05
So what I am saying is this process 11:05
that we have talked about so far can be mapped 11:05
to the claim in that manner. 11:05
Q. And the claim requires that the 11:05
automation process exist before you start the 11:05

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claim? 11:05

MS. NGUYEN: Objection, form. 11:05

A. So the language of the claim is 11:06
saying that the preamble is telling you it's a 11:06
method for defining an automation process. And 11:06
then it continues, "Wherein the automation 11:06
process is configured to be invoked in response 11:06
to conversation of the user with a natural 11:06
language interface, the method comprises..." 11:06
And then it lists the method that the automation 11:06
process is configured to be invoked. 11:07

And it does say that it's a 11:07
parametric automation process. So the user 11:07
information sets the parameters of that 11:07
automation process. 11:07

But the automation process, because 11:07
it is saying a method for defining an automation 11:07
process, wherein the automation process is 11:07
configured, configured to be invoked in response 11:07
to the conversation of a user with a natural 11:07
language interface, the method comprising. 11:07

So let's look at where the 11:07
configuration of the automation part that 11:07
executes, not the whole -- right, repeat the 11:07

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conversation. 11:07

Q. And are you saying that the 11:07
conversation does not exist until after the 11:07
automation process is configured, defined or 11:07
whatever the claim requires to be done? 11:08

A. I think the two are related to -- 11:08
they need -- they both need to exist because -- 11:08

MS. NGUYEN: Objection, form. 11:08

Dr. Beigi, please give me an 11:08
opportunity to object. 11:08

THE WITNESS: Sure. 11:08

MS. NGUYEN: Thank you. 11:08

A. I think that when it is required -- 11:08
when it says, "A method for defining an 11:08
automation process, wherein the automation 11:08
process is configured to be invoked," so here, 11:08
configured to invoked in response to the 11:08
conversation of a user with a natural 11:08
language -- I'm sorry, with a natural language 11:08
interface. 11:08

So far we are defining an automation 11:08
process where the automation process is 11:08
configured. We are not building it from 11:08
scratch, agreed? We are not building it from 11:08

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scratch. We are configuring it. It says "to be 11:08
configured," this is the language. No, no -- 11:08
Q. The question is not my opinion, the 11:08
question is your opinion? 11:08
A. It is my opinion. I'm reading the 11:08
patent and it says "a method for defining an 11:09
automation process wherein," so it's defining 11:09
how that happened, that definition happened, 11:09
"wherein the automation process is configured, 11:09
to be invoked," configured to be invoked "in 11:09
response to the conversation of a user with a 11:09
natural language interface, the method 11:09
comprising," which we have talked about, but the 11:09
method that it uses to define an automation 11:09
process includes defining a conversation to be 11:09
implemented by a natural language interface 11:09
wherein the conversation is configured to obtain 11:09
from the user one or more values to one or more 11:09
parameters associated with the automation 11:09
process. 11:09
So it's parameter automation 11:09
process. 11:09
Q. The same automation process because 11:09
it's the automation process? 11:09

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A. The automation, but it is a 11:10
parametric automation process. It says in black 11:10
and white. It says, "To obtain from" -- and it 11:10
says "configured" and it says, "to obtain from 11:10
the user one or more values to one or more 11:10
parameters associated with the automation 11:10
process." 11:10
Q. So at that point, does the 11:10
automation process exist before the chat or 11:10
conversation is configured to obtain the 11:10
parameters? 11:10
MS. NGUYEN: Objection, form. 11:10
Counsel, please stop interrupting 11:10
him. 11:10
A. So in the parametric form, it's the 11:10
automation process that has a parametric form 11:10
and you're configuring it. 11:10
So you're defining the 11:10
conversation -- you have to define the 11:10
conversation in a way that is aware of the 11:10
parameters of the automation process. Because 11:10
you're -- you're getting from the user relevant 11:10
parameters. Relevant to what? Relevant to the 11:11
automation. 11:11

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Q. And the language says the automation 11:11
process configured, past tense. Does that mean 11:11
the automation process exists before that -- I'm 11:11
sorry, let me go back. 11:11
So in the association step, it says 11:11
the automation process is configured in past 11:11
tense. Does that mean that the automation 11:11
process already exists before the conversation 11:11
is associated with it? 11:11
MS. NGUYEN: Objection, form. 11:11
A. It is not past tense. It is not 11:11
past tense. It says -- it doesn't say it was 11:11
configured. It says is configured. It's part 11:11
of it. 11:11
Q. So your -- 11:11
A. It's configured. 11:11
Q. So your interpretation is the 11:11
association is done at the same time, before, 11:11
after or at any time with respect to the 11:12
configuration of the automation process? 11:12
MS. NGUYEN: Objection. 11:12
A. I didn't say that. I say, "Wherein 11:12
the automation process is configured." You say 11:12
it's a past tense. 11:12

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Q. Right. 11:12
A. I said the automation process is 11:12
configured is not past tense. 11:12
Q. You don't think that "is configured" 11:12
means it has already been configured? 11:12
A. "Is configured." That means this is 11:12
the process. 11:12
Q. Is that the same -- so here is the 11:12
question for you -- 11:12
A. It's a process of automation. It's 11:12
a process -- it's a method for defining 11:12
automation process wherein the automation 11:12
process is configured. 11:12
Q. So does it exist -- 11:12
A. Wherein -- wherein the food is put 11:12
on the table. 11:12
Q. So if I were to be configuring the 11:12
automation process, would you say the automation 11:12
process is being configured? Or would you say 11:12
is configured, grammatically? 11:12
MS. NGUYEN: Objection, form. 11:12
Please stop interrupting him, 11:12
Counsel. 11:12
A. The way I read this, "wherein the 11:12

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automation process is configured to be invoked," 11:13
is configured to be invoked, present, to be 11:13
invoked, future. Configured to be invoked. 11:13
Q. "Is configured" means that the 11:13
automation process does or does not exist? Or 11:13
it could? Could be either in your opinion? 11:13
MS. NGUYEN: Objection, form. 11:13
A. "Is configured" -- the automation 11:13
process is configured as provided. So it's 11:13
configured to be invoked. It's configured -- 11:13
the automation process is configured to be 11:13
invoked in response to a conversation of a user 11:13
with a natural language interface. 11:13
So this is a method for defining the 11:13
automation process wherein, in that method, the 11:13
automation process is configured. Within that 11:13
umbrella, the automation process is configured. 11:13
Q. You have -- in the method of 11:14
associating the conversation with the automation 11:14
process, right? 11:14
MS. NGUYEN: Objection form. 11:14
A. We are moving to the association? 11:14
Q. That's what you are talking about. 11:14
A. I'm talking about the preamble. I'm 11:14

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just talking the preamble. 11:14

Q. I'm talking about "in the 11:14

association" step? 11:14

A. I'm not going there yet. 11:14

But I was just -- you said 11:14

configured is past tense and I'm reading in the 11:14

preamble and I'm saying that it says "wherein 11:14

the automation process is configured." Are you 11:14

saying it was configured? "Was" is past tense. 11:14

"Is configured" is now. 11:14

Q. I'm asking in the association step, 11:14

where it says, "associating the conversation 11:14

with the automation process"? 11:14

A. But I'm not there. 11:14

Q. I understand. I'm asking you that 11:14

question right now? 11:14

A. Are we skipping what we were talking 11:14

about then? We are moving to that? 11:14

Q. The question I asked you is whether 11:14

those three paragraphs relate to each other and 11:14

you didn't answer that question. 11:14

A. I am answering. 11:14

MS. NGUYEN: Objection, form. 11:14

Q. You answered how you applied those 11:14

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paragraphs to the claim. All I asked was 11:14
whether the three paragraphs were related to 11:14
each other. 11:14
A. They are related to each other. 11:14
They come after each other in the 11:15
specifications. 11:15
Q. And they are talking about a problem 11:15
with the proposed solution, right? 11:15
MS. NGUYEN: Objection, form. 11:15
A. The three paragraphs are in the 11:15
specifications following each other and, 11:15
therefore, they're related. 11:15
Q. Well, paragraph that comes after 11:15
that follows but doesn't relate to the same 11:15
substance. 11:15
A. It is same substance as the patent 11:15
and the specification. 11:15
Q. I want to know if you think the 11:15
three paragraphs that we were talking about 11:15
starting at the bottom of column 5 and moving on 11:15
to column 6 are talking about a technical 11:15
problem where it's proffering a technical 11:15
solution related to that technical problem? 11:15
MS. NGUYEN: Objection. 11:15

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Q. That is all I was asking. 11:15
MS. NGUYEN: Form. 11:15
A. I'm just asking about continuity. 11:15
Q. I'm not asking about whether they 11:15
are placed in numerous -- in order. I'm asking 11:15
whether they are substantively related to each 11:15
other? 11:15
A. Right. Logical continuation. 11:15
Continuity, yes. They are continuing in the 11:15
same discussion. 11:16
Q. Okay. That is all I was asking, 11:16
okay? 11:16
A. If that is all you're asking because 11:16
that was-- 11:16
Q. That is all I was asking. 11:16
A. I'm relating it to -- 11:16
Q. I'm trying not to interrupt you 11:16
because Counsel gets upset. 11:16
A. That's what I was referring to -- is 11:16
that you were -- the part was -- that I was 11:16
talking about was the GUI in the beginning of 11:16
the third paragraph and how it relates -- and 11:16
that's what you were asking questions about, how 11:16
it relates to claim 1. 11:16

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Q. Not that question. Earlier I was. 11:16
Not there. 11:16
A. But we are in the same context. 11:16
Q. Okay. But you have to answer the 11:16
questions I'm asking, not questions I asked 20 11:16
minutes ago. Okay. 11:16
MS. NGUYEN: Objection, form. 11:16
Q. So right now, what I want you to do 11:16
right now is I want you to look at the 11:16
associating step in claim 1 of the '732 patent 11:16
and see where it says "associating the 11:16
conversation with an automation process"? 11:16
A. "With the automation process." 11:16
Q. And you understand that the 11:16
conversation that's being associated is the one 11:16
that was being defined as defining a 11:16
conversation in the previous step, right? 11:17
A. Yes. 11:17
MS. NGUYEN: Objection, form. 11:17
Q. And you understand that the 11:17
automation process that is being associated with 11:17
is the same automation process that's being 11:17
defined in the preamble as defining in the 11:17
automation process? 11:17

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MS. NGUYEN: Objection, form. 11:17

A. Ask the second question again 11:17
please. 11:17

Q. You understand that the association 11:17
process -- I'm sorry, in the associating step 11:17
where it says, "associating the conversation 11:17
with the automation process," you understand 11:17
that the automation process is referring to the 11:17
same automation process that is in the preamble, 11:17
a method for defining an automation process, 11:17
correct? 11:17

MS. NGUYEN: Same objection. 11:17

A. I believe this automation process is 11:18
the same automation process as the preamble, but 11:18
with the caveat that I stated before, although 11:18
it is a method of -- for defining an automation 11:18
process, and although there is a distinction 11:18
that the specifications make between the 11:18
automation process and the conversation, the 11:18
chatbot and the RPA, sometimes they're lumped 11:18
together. 11:18

So it is saying that a method for 11:18
defining an automation process and this 11:18
automation process is the automation process 11:18

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that they are talking about in -- as a whole. 11:18
They are, in the same breadth, in one claim, the 11:18
conversation itself is also being defined. 11:18
Q. To the extent you say that they can 11:18
be lumped together, there is a logical division 11:18
when they are lumped together between the 11:18
automation process and the conversation or the 11:18
natural language interface, correct? 11:19
A. Yes, but I'm saying -- 11:19
MS. NGUYEN: Objection, form. 11:19
A. -- in the -- in the claim, the 11:19
beginning of the claim says, "A method for 11:19
defining an automation process," and it includes 11:19
all of this. 11:19
So what I'm saying is that when 11:19
defining the automation process, it is basically 11:19
defining a conversation which we talked about as 11:19
a chatbot part. It's associating the 11:19
conversation with the automation process and in 11:19
its parameterized form. So using parameters 11:19
from the chatbot. 11:19
And then having these two, not 11:19
necessarily in that order because it is talking 11:19
about an automation process which must have 11:19

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existed because otherwise, how do you come up 11:19
with the conversation? 11:19
So this is what we talked about in 11:19
the last deposition also. 11:19
I believe the defining and 11:19
associating are -- they need each other. You 11:19
can't do one without the other. And then you do 11:20
the publishing. So that's what I am trying to 11:20
explain. 11:20
But when automation process is used, 11:20
automation -- in the process of defining the 11:20
automation process also the conversation is 11:20
defined. 11:20
Q. So when you are publishing, you 11:20
already have the complete conversation and the 11:20
complete automation process defined and 11:20
configured and associated, correct? 11:20
MS. NGUYEN: Objection, form. 11:20
A. Ask the question again, please. 11:21
Q. So at the time that the publishing 11:21
of a conversation is occurring, you already have 11:21
defined the conversation, configured the 11:21
automation process and associated the 11:21
conversation to the configured automation 11:21

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process, is that correct? 11:21

MS. NGUYEN: Same objection. 11:21

Q. The complete form? 11:21

A. You have -- you have defined the 11:21

conversation. You have associated the 11:21

conversation with the automation process in its 11:21

parameterized form. And when you publish it, 11:21

you are making it available to the user to run 11:21

it, so that it can provide -- it can obtain the 11:21

parametric values and to run the automation 11:22

process. 11:22

Q. You are making available to the user 11:22

or to the natural language interface, the 11:22

conversation? 11:22

A. "Wherein the user," "user is enabled 11:22

to interact with the natural language interface 11:22

in accordance with the conversation." So you 11:22

are making it available to the user. 11:22

Q. Well, you are publishing the 11:22

conversation to be accessible to a user via a 11:22

natural language interface? 11:22

A. That's what I said, I said to a 11:22

user. 11:22

Q. Through the natural language 11:22

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interface? 11:22

MS. NGUYEN: Objection, form. 11:22

A. Via the natural language interface, 11:22
yes. 11:22

Q. So to publish the conversation to 11:22
the user, you have to do it through the natural 11:22
language interface? 11:22

MS. NGUYEN: Objection, form. 11:22

A. So when you make it available to the 11:22
user, at that point, the user may interact with 11:23
the natural language interface, where the user 11:23
is enabled to interact with the natural language 11:23
interface in accordance with the conversation 11:23
that will be defined previously, where the 11:23
parameterized automation process is invoked 11:23
automatically by the natural language interface 11:23
using one or more of the parameters. 11:23

So natural language interface is 11:23
invoking the automation process automatically 11:23
using the parameters, one or more parameters 11:23
that it received from the user via the natural 11:23
language interface. 11:23

Q. Do you understand that the way that 11:23
the conversation is being published is by 11:23

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providing it to a user interface so that a user 11:24
can access it? Yes or no? 11:24
MS. NGUYEN: Objection, form. 11:24
Q. Do you understand my question, 11:24
Dr. Beigi? 11:24
A. I -- rephrase it -- state again. 11:24
Q. Do you understand that the way the 11:24
conversation is being published is by providing 11:24
the conversation in whatever form it is to the 11:24
natural language interface so that a user can 11:24
access it? 11:24
MS. NGUYEN: Same objection. 11:24
A. It's made accessible to the user 11:24
through the means of the natural language 11:24
interface. 11:24
Q. And what do you understand 11:24
publishing the conversation via the natural 11:24
language interface to mean? 11:24
A. Publishing the conversation via the 11:24
natural language interface means the 11:24
conversation that has been defined will be 11:25
looking for certain parameters to pass through 11:25
the automation process so it can execute. 11:25
Q. You saw the chatbot editor in the 11:25

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patent, right? 11:25
A. Yes. 11:25
Q. And in the chatbot editor, there is 11:25
various buttons that you push, you want to hide 11:25
a message, you want to -- a question? 11:25
A. Show me the page -- 11:25
MS. NGUYEN: Objection, form. 11:25
Q. Sure. You can look at -- look at 11:25
figure 5B. And look at the '732 patent. 11:25
And this is -- this is an exemplary 11:25
embodiment of a chatbot editor that could be 11:25
used in accordance with the invention, right? 11:25
MS. NGUYEN: Objection, form. 11:26
A. So A through E shows schematic 11:26
illustrations of the user interface. 11:26
Q. Of the chatbot editor, right? 11:26
A. Do you have let me get the detail 11:26
for that. 11:26
Q. I'm sorry, 5D. 11:26
Dr. Beigi, if you look at column 15, 11:27
line 40, it says, "In conversation details 11:27
editor, 540, shown in figure 5A." 11:27
A. Are we in 5A now? 11:27
Q. I'm just trying to show you that 11:27

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what figure 5 is talking about is the 11:27
conversation details out of this which I am 11:27
referring to as the chatbot editor. 11:27
A. Give me one second. I lost my place 11:27
on the columns. Where was it? 11:27
Q. Column 15. 11:27
A. Okay. 11:28
Q. So in 5B, they're building the 11:28
conversation with the actions to be taken, 11:28
right? 11:28
MS. NGUYEN: Objection, form. 11:28
Q. You see at 505 it refers to 11:28
conversations and that's in bold. 11:28
A. Conversation editor is 540, it says, 11:28
in conversation detail editor. 11:28
Q. Right. 11:28
A. Details editor, 540, that's what you 11:28
are talking about, 540? 11:28
Q. Right. 11:28
A. Okay, that's in 5B, yes. 11:28
Q. Right, and in 5B, there is a the 11:28
conversation flow buttons for add a message, add 11:28
a question, add a condition, add an action, 11:29
right? 11:29

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A. Yes. 11:29
Q. And you rely on that in your report? 11:29
A. Yes. 11:29
Q. Your reply report, right? 11:29
And you understand by the user 11:29
pushing those buttons, they can add a message, 11:29
for example, if they push 552, right? 11:29
A. That's correct. 11:29
Q. If they push 554, the user can add a 11:29
question. 11:29
A. That's correct. 11:29
Q. And if they push 556, they can add a 11:29
condition? 11:29
A. Yes. 11:29
Q. And if they push 558, they can add 11:29
an action? 11:29
A. Yes. 11:29
Q. And that at the bottom of the page, 11:29
after the user does whatever the user is going 11:29
to do in there, there is a button that says 11:29
"unpublish" and I think it also says "publish" 11:29
on a different screen. 11:29
MS. NGUYEN: Objection, form. 11:29
A. Where is the other screen? 11:29

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Q. I'm looking for it. It may say it 11:29
in the body. 11:29
But do you understand that if there 11:29
is an "unpublish" button there would also be a 11:29
"publish" button? 11:29
MS. NGUYEN: Objection, form. 11:29
A. Well, not necessarily but -- not 11:29
necessarily. If you could find it, that would 11:30
be great. 11:30
Q. Okay, that's fine. 11:30
A. But are we talking about that part 11:30
at this point? 11:30
Q. We are talking about publication, 11:30
that's what I am trying to get to, right? 11:30
A. Yes. 11:30
Q. Do you think a POSITA would 11:30
understand that an embodiment would include a 11:30
publication button in addition to the unpublish 11:30
button? 11:30
MS. NGUYEN: Objection, form. 11:30
A. A POSITA would understand that there 11:30
is a publish mechanism because there is a 11:30
publish mechanism in claim 1. 11:30
Q. Right. And the unpublish button is 11:30

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saying that you are taking it away from 11:30
something, right? 11:30
MS. NGUYEN: Objection, form. 11:30
A. Whether it is implemented by the 11:30
same GUI, I cannot attest to because I don't see 11:30
that. You are seeing the GUI for unpublish. 11:30
Q. Do you have any doubt sitting here 11:30
today that the POSITA would understand that 11:30
there could be a "publish" button on figure 5B 11:30
where the "unpublish" button is if the 11:31
conversation has not yet been published? 11:31
MS. NGUYEN: Objection, form. 11:31
A. I can't tell you exactly with all 11:31
the stuff that's going on here, but there should 11:31
be a publish mechanism somewhere because that's 11:31
what claim 1 asks for. 11:31
But exactly is it in that -- would 11:31
it be in this location because there is a figure 11:31
with all sorts of things in it. This is the 11:31
unpublished list. 11:31
So that -- you're asking me to say 11:31
just replace an "unpublish" with a "publish" and 11:31
this would be in tune with the what the patent 11:31
says. That's a full set of stuff. So -- yeah. 11:31

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Q. So to the extent there is a "publish" mechanism of some kind, is it being sent to the user or is it being published to the natural language interface? 11:31

MS. NGUYEN: Objection, form. 11:31

A. Based on the claims, the publish makes the user interface -- let me go back to the claim. 11:31 11:31 11:32

"Publishing the conversation to be accessible to the user is the first thing, via the natural language interface, wherein the user is enabled to interact with the natural language interface in accordance with the conversation." 11:32 11:32 11:32 11:32 11:32

So publishing -- basically the natural language conversation that was -- that was defined previously. So that it is accessible to the user, so that they would go on and interact with the natural language interface. 11:32 11:32 11:32 11:32 11:32 11:32 11:32 11:32

Q. So now I'm switching subjects entirely. So don't go back and say don't -- don't go try answering other questions. 11:32 11:32 11:33

A. Are we still on the same patent? 11:33

Q. We are still on the same patent. 11:33

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So what I want to do, I want to make 11:33
sure that we understand what "a" and "the" mean. 11:33
Before we were talking about a 11:33
method for defining an automation process 11:33
wherein the automation process is configured. 11:33
And I believe your testimony was "the automation 11:33
process is configured" is referring to the same 11:33
automation process as "an automation process." 11:33
I'm looking at claim 1 of the '732 patent on 11:33
lines 15 and 16. 11:33
MS. NGUYEN: Objection, form. 11:33
Q. Did I correctly understand your 11:33
testimony? 11:33
A. So which part and which part? 11:33
Q. The first two lines of the claim, it 11:33
says, "A method for defining an automation 11:33
process wherein the automation process is 11:33
configured." 11:33
And I just want to confirm that when 11:33
it says "the automation process," it referring 11:34
to the same automation process as "an automation 11:34
process" in the previous line. 11:34
MS. NGUYEN: Same objection. 11:34
A. I think that's fair to say. 11:34

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Q. And in the defining step, it says, 11:34
"Defining a conversation to be implemented 11:34
where" -- and then ... "wherein the conversation 11:34
is configured," and we are looking at lines 19 11:34
and 20. 11:34
And I just want to confirm that the 11:34
"a conversation" is the same conversation as 11:34
"the conversation." 11:34
MS. NGUYEN: Objection, form. 11:34
A. Where is "the conversation"? 11:34
Q. It's the next line. 11:34
A. "So defining a conversation to be 11:34
implemented by a natural language interface 11:34
wherein the conversation is configured to obtain 11:34
from the user," I believe that "the 11:34
conversation" refers back to "a conversation." 11:34
Q. Okay. And then, when it -- further 11:34
down in that same element, it talks about 11:35
"associated with the automation process," again, 11:35
it's the same automation process as we were 11:35
talking about on line 15 and the line I'm 11:35
referring to is line -- the automation process 11:35
on lines 23 and 24. 11:35
MS. NGUYEN: Objection, form. 11:35

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Q. So line 23 and 24, it talks about 11:35
"parameters associated with the automation 11:35
process," and I want to confirm that the 11:35
automation process is the same automation 11:35
process that we referred to on lines 15 as "an 11:35
automation process" and line 16 as "the 11:35
automation process"? 11:35
MS. NGUYEN: Objection, form. 11:35
A. The user -- one or more 11:36
parameters -- so the automation process is again 11:36
the same automation process. 11:36
Q. And each time it refers to "the 11:36
automation process" throughout the claim, you 11:36
understand it's the same automation process, is 11:36
that correct? 11:36
MS. NGUYEN: Objection, form. 11:36
A. Not each time. 11:36
Q. Can you tell me where it doesn't? 11:36
A. Well, for example, "wherein, the 11:36
automation process is a parameterized automation 11:36
process." 11:36
So now it's not, the "a 11:36
parameterized" is not -- cannot be conflated 11:37
with "the." "The" is an example. "The 11:37

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automation process is a parameterized." 11:37

so I think what you said wherever it 11:37

says "a" -- 11:37

Q. I said "the." 11:37

A. Yes, "the automation process" should 11:37

be "the automation process." 11:37

Q. And what the clause you just 11:37

referred to, "wherein the automation process is 11:37

a parameterized automation process," using "a" 11:37

because it defining a different kind of 11:37

automation process which further delimits what 11:37

"the automation process" is, is that correct? 11:37

MS. NGUYEN: Objection, form. 11:37

A. It's talking about the -- the 11:37

automation process being a form of automation 11:37

process which is a parameterized automation 11:37

process. 11:37

Q. So everywhere where "the automation 11:37

process" is referred to, it is talking about it 11:37

being a parameterized automation process as a 11:37

result of that wherein clause, is that your 11:37

understanding? 11:37

MS. NGUYEN: Objection, form. 11:37

A. My understanding is that the 11:37

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automation process in -- so here, in the 11:38
associating, the conversation with the 11:38
automation process, "wherein the automation 11:38
process is configured to utilize a user 11:38
interface of a computer program to simulate a 11:38
sequence of interactions with the displayed user 11:38
interface of the computer program and execute a 11:38
functionality of the computer program wherein 11:38
the automation process is a parameterized 11:38
automation process depending on one or more 11:38
parameters." 11:38
So in this context, the automation 11:38
process is limited to be a -- a parameterized 11:38
automation process. 11:38
Q. And that would be wherever the 11:38
automation process is being referred to 11:38
throughout claim 1? 11:38
MS. NGUYEN: Objection, form. 11:38
Q. As a result of that limitation? 11:38
A. From here on, it is assuming that 11:38
it's a parameterized automation process. 11:39
MS. NGUYEN: Can we take a break. 11:39
MR. MACEDO: Give me five more 11:39
minutes if that's okay and we can take a 11:39

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break. 11:39

Q. And where you see it says around 11:39
line 27, "configured to utilize a displayed user 11:39
interface of a computer program," and then it 11:39
continues on to say "to simulate sequence of 11:39
interactions with the displayed user interface 11:39
of the computer program," is it your 11:39
understanding that the displayed user interface 11:39
is the same user -- displayed user interface as 11:39
a displayed user interface? 11:39

MS. NGUYEN: Objection, form. 11:39

A. Well, you can't make that conclusion 11:40
because it says "Associating the conversation 11:40
with the automation process wherein the 11:40
automation process is configured to utilize a 11:40
user -- a displayed user interface of a computer 11:40
program to simulate sequence of interactions 11:40
with the displayed user interface of the 11:40
computer program." 11:40

So you don't necessarily -- it 11:40
doesn't necessarily have to be the same user 11:40
interface because it says it uses a -- it's 11:40
configured to utilize a displayed user interface 11:40
of a computer program, to simulate the sequence 11:40

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of interactions with the displayed user 11:40
interface of the computer program. It could be 11:40
the same. 11:41
Q. Can it not be the same? 11:41
MS. NGUYEN: Objection, form. 11:41
A. Because it says, "Wherein the 11:41
automation process is configured to utilize a 11:41
displayed user interface of a computer program." 11:41
Use that to simulate a sequence of interactions 11:41
with the displayed user interface of a computer 11:41
program. 11:41
So utilize the GUI to simulate 11:41
interaction with the displayed user. 11:41
So a -- because it uses "a" 11:41
displayed and then "the" displayed. 11:41
So the question is which one is "a" 11:41
displayed and which one is "the" displayed. And 11:41
"a" displayed could be one -- 11:41
Q. Any? 11:41
A. Any displayed. 11:41
Q. Once you say "the" -- 11:41
A. "The" display is the thing that it 11:41
interacts with. 11:42
So let me -- interacts -- 11:42

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interactions with the displayed user interface 11:42
of the computer program. So it uses a displayed 11:42
user -- so because this is the associating part, 11:42
right? 11:42
So associating the conversation with 11:42
the automation process wherein the automation 11:42
process is configured to utilize a displayed 11:42
user interface of a computer program to simulate 11:42
sequence of interactions with the user 11:42
interface. 11:42
Q. Of the computer program? 11:42
A. Of the computer program, yes. 11:42
Q. And is it your understanding that 11:42
the displayed user interface of the computer 11:42
program must be the same displayed user 11:42
interface of the same computer program as a 11:42
displayed user interface of a computer program? 11:42
MS. NGUYEN: Objection. 11:42
Q. And I'm referring to lines 26 for 11:42
the "As" and 27 and 28 for "thes." 11:42
Do you understand my question? 11:43
A. I understand. 11:43
So that's the part that I'm trying 11:43
to make a distinction. When it says a displayed 11:43

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user interface of a computer program to simulate 11:43
sequence of interactions with the displayed -- 11:43
the user interface of the computer program and 11:43
execute a function. 11:43
So because it says "a computer 11:43
program" and doesn't say "the computer program," 11:43
right, it is specifically saying "a computer 11:43
program." 11:43
So you can think of using a display 11:43
user interface of a computer program to simulate 11:43
the sequence of interaction with the displayed 11:43
user interface of -- the displayed user 11:43
interface of the computer program and for these 11:43
to be separate or they could be the same. 11:43
I'm not saying that -- but I'm 11:43
saying if you read it, you know, in detail, you 11:43
could see that both are possible. There is a 11:44
possibility that you can use a computer program 11:44
with a user interface to enable the computer 11:44
program, the user interface. 11:44
Q. So when you applied the claims, did 11:44
you apply it with the assumption that the 11:44
displayed user interface of the computer program 11:44
must be the same displayed user interface of the 11:44

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same computer program as a displayed user 11:44
interface of a computer program referring to the 11:44
same portions of the associated claim? 11:44
MS. NGUYEN: Objection, form. 11:44
A. It depends on where we are talking 11:44
about. If you show me -- because, as I say, 11:44
since the claim is allowing for either/or, you 11:44
can -- it allows -- it allows -- it makes a 11:44
distinction, it makes a distinction between "a" 11:45
and "the." Otherwise, it would have said "the" 11:45
from the beginning. 11:45
Q. Actually, as a matter of patent law 11:45
that's not correct. As a matter of patent law, 11:45
you would get a 112 rejection -- are you aware 11:45
that as a matter of patent law you would get a 11:45
112 rejection if you referred to "the" something 11:45
without first saying "a" something? 11:45
It would be called lack of 11:45
antecedent basis. Are you aware of that 11:45
principle in patent law where -- 11:45
MS. NGUYEN: Objection, form. 11:45
A. I'm not a patent lawyer, but let 11:45
me -- 11:45
Q. I know you're not a patent lawyer. 11:45

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A. Just, you know, you are giving me -- 11:45
Q. I'm just asking whether you are 11:45
aware. 11:45
A. Yeah. Associated -- so let me go 11:45
back and make sure -- yet that distinction is 11:45
not clear, but if that's the way -- and it's 11:46
conditional, right -- if that's the way it 11:46
should be looked at, then I'm saying that yet 11:46
that distinction is not clear. 11:46
However, I don't think it makes any 11:46
difference in the way I've interpreted. I'm 11:46
just being pedantic here. I'm saying that when 11:46
you say a computer program, a user interface and 11:46
here you're saying the computer program, the 11:46
user interface, in English, you are not putting 11:46
the two together. 11:46
You could very specifically say the 11:46
same program, for example, a computer program to 11:46
make it more clear, but it's not. 11:46
But what I am saying is that doesn't 11:46
make any difference in the way I've analyzed it. 11:46
I'm just saying when you asked me to analyze it 11:46
reading it here, I'm saying that it could have 11:46
that possible connotation. 11:46

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Q. And are you offering any expertise in English grammar? 11:47

MS. NGUYEN: Objection. Form. 11:47

Q. Are you a Ph.D. in English or do you offer any expertise with respect to English grammar? 11:47

MS. NGUYEN: Objection, form. 11:47

Q. As a fluent speaker, I -- as a user, I don't offer any expertise. As a common user of the English language. That's my understanding. As a common user of the English language. 11:47

MS. NGUYEN: Can we take a break. 11:47

MR. MACEDO: Yes. It's 11:47 can we come back at noon? 11:47

(Luncheon recess) 11:47

(Continued on next page) 11:47

1 H. Beigi - 11.12.24
2 AFTERNOON SESSION 12:42
3 12:42 p.m. 12:42
4 (Exhibit 40, document entitled 12:42
5 "Natural Language Processing" marked for 12:42
6 identification, as of this date.) 12:42
7 (Recess) 12:47
8 Q. Dr. Beigi, welcome back. 12:48
9 A. Thank you. 12:48
10 Q. Are you still capable of continuing 12:48
11 to testify truthfully and accurately? 12:48
12 A. Yes. 12:48
13 Q. And you understand you are under 12:48
14 oath? 12:48
15 A. Yes. 12:48
16 Q. If you turn to the '664 patent, 12:48
17 please, and I want you to turn to the claims, 12:48
18 it's Beigi Exhibit 8. 12:48
19 So in claim 1 on line 15, it refers 12:48
20 to a user. 12:48
21 Do you see that? 12:48
22 A. Yes. 12:48
23 Q. And the user is someone who is 12:48
24 interacting with the natural language interface, 12:48
25 correct? 12:48

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A. Yes. 12:49
Q. And claim 12, it refers to the user, 12:49
right? 12:49
A. Claim 2. 12:49
Q. 12? Claim 12? 12:49
A. I'm sorry, 12. 12:49
Let me turn this off if you don't 12:49
mind. 12:49
Q. Sure. 12:49
A. I see claim 12, yes. 12:49
Q. In claim 12, it refers to a client 12:49
device of the user, correct? 12:49
A. Yes. 12:49
Q. And "the user" you understand to be 12:49
the same user as "a user" in claim 1, right? 12:49
A. Yes. 12:49
Q. And a client device of a user would 12:49
be a device that is the user who is 12:49
participating in the conversation device, right? 12:50
MS. NGUYEN: Objection, form. 12:50
A. It's the device of the user which is 12:50
in claim 1, participating in the conversation. 12:50
Q. Not the device of the user but the 12:50
user -- the same users in claim 1's device, 12:50

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correct? 12:50

MS. NGUYEN: Objection, form. 12:50

A. It's on a client device of the user. 12:50

So I'm saying the client device belongs to the 12:50

user which is in claim 1. 12:50

Q. So for example, Symons, the user 12:50

would have been Mr. Vin Bie who was 12:50

participating in the conversation, right? 12:50

A. Yes. 12:50

Q. And the client device would be 12:50

Mr. Vin DeBie's computer? 12:50

A. Yes. It can be, yes. 12:50

Q. But it wouldn't be someone else's 12:50

device, right? 12:51

A. The client device of the user, yes, 12:51

of that person discoveries, yes. 12:51

Q. Which in the context of Symons would 12:51

be Mr. Vin DeBie, right? 12:51

A. Yes. 12:51

MS. NGUYEN: Objection, form. 12:51

Q. In claim 16, it says presented to 12:51

the user. 12:51

A. Yes. 12:51

Q. And again, "the user" in claim 16 is 12:51

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the same "a user" as in claim 1, right? 12:51
A. Yes, because it's referring back to 12:51
claim 1, yes. 12:51
Q. Right. So in the context of Symons 12:51
presenting to the user would be presenting to 12:51
Mr. Van Bie, right? 12:51
MS. NGUYEN: Objection. 12:51
A. In the context of that conversation 12:51
in Symons -- 12:51
Q. Yes. 12:51
A. The user -- 12:51
Q. And it says Vin DeBie but I mean 12:52
Vincent Dubai? 12:52
A. Yes, Vincent DeBie is the user. 12:52
Q. And presented to the user means 12:52
presented to the Mr. Vincent DeBie in the 12:52
context of the conversation from the Symons 12:52
reference, right? 12:52
MS. NGUYEN: Objection, form. 12:52
A. So the display user interface of the 12:52
computer is presented to the user which is the 12:52
person who is in communication with the user 12:52
interface, with the natural language interface. 12:52
Q. And in the context of the Symons 12:53

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reference, that was Vincent DeBie? 12:53

MS. NGUYEN: Objection, form. 12:53

Q. He was the one that was 12:53

communicating with the chatbot, right? 12:53

MS. NGUYEN: Same objection. 12:53

A. I just want to make sure if I go 12:53

back to it. 12:53

Q. Absolutely. 12:53

A. In the context of what you called 12:54

the Symons exhibit which is RPA meets Robot -- 12:54

Symons exhibit. 12:54

Q. And you looked at Beigi 14? 12:54

A. Beigi 14, yes. 12:54

The user, the person communicating 12:54

with the chatbot is Vincent DeBie because it 12:54

states his name. 12:54

Q. So going back to the '664 patent 12:54

claim 1, when it says a natural language 12:54

interface on line 15, and then refers to the 12:54

natural language interface on line 17, you 12:54

understand those are the same natural language 12:55

interfaces, right? 12:55

MS. NGUYEN: Objection, form. 12:55

A. Which two are the same? 12:55

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Q. Using a natural language interface, 12:55
that's the first one, in line 15? 12:55
A. Yeah. 12:55
Q. And then receiving input from a user 12:55
as part of a natural language conversation 12:55
between the natural language interface on line 12:55
17, is that -- the natural language interface is 12:55
what I'm saying, do you agree that the natural 12:55
language interface on line 17 is the same 12:55
natural language interface as a natural language 12:55
interface on Klein 15? 12:55
A. It seems, yes, it seems so, yes. 12:55
Q. When it refers to, on line 16, a 12:55
natural language conversation, is that the same 12:55
natural language conversation where it goes 12:56
"wherein the natural language conversation 12:56
comprises," is it the same? And I'm looking at 12:56
line 18, 17, 18. 12:56
MS. NGUYEN: Objection, form. 12:56
A. So in line 16, where it says, "As 12:56
part of a natural language conversation between 12:56
the natural language interface and the user 12:56
wherein the natural language conversation 12:56
comprises," the natural language conversation is 12:56

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going back to a natural language conversation. 12:56
Q. Okay. And that's generally with "a" 12:56
and "the" mean in the context of the claim in 12:56
your understanding; that when the first time it 12:56
says "a" something, and the second time it 12:56
refers to "the" something, it was meant to be 12:56
the same something? 12:56
Is that your understanding as a 12:56
matter of what you've been told the patent 12:56
should be read as? 12:56
MS. NGUYEN: Objection, form. 12:57
A. In some cases, it's clear. In some 12:57
cases where you have them grouped together, then 12:57
it becomes a little more unclear. 12:57
Q. Is there any place in claim 1 of the 12:57
'664 patent where you don't think that the 12:57
second reference of "the" to the same item 12:57
refers back to the first reference of "a"? 12:57
MS. NGUYEN: Objection, form, calls 12:57
for a legal conclusion. 12:57
A. A -- the ones that we looked at, 12:57
they seem to reflect the -- they seem to reflect 12:58
the "a" read in continuity. 12:58
Q. Okay, now so if you turn to the '732 12:58

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patent, Beigi Exhibit 9, just a little lower. 12:58
It was in the pile or is it -- 12:58
A. I think it's this. '732. Yeah. 12:58
Q. Okay. So I'm going to go through 12:58
various portions of the '732 patent. I'm going 12:59
to direct you to specific column and line 12:59
numbers and it's a simple question that I'm 12:59
asking you. Does that passage use the word 12:59
"computer program," not "computer program 12:59
product," not "agent," not some other piece of 12:59
software. But just the word "computer program." 12:59
Do you understand? 12:59
A. Yes. 12:59
MS. NGUYEN: Objection, form. 12:59
Q. So the first passage I want to send 12:59
you to is column 10, lines 11 through 17. And 12:59
so we are all on the same page, why don't you 12:59
read the full paragraph which starts on line 9 12:59
and go through the end of the paragraph. It 12:59
starts "in some exemplary embodiments." Okay? 12:59
A. Yes. 13:00
Q. Read that into the record, please. 13:00
A. "In some exemplary embodiments, 13:00
automation execution module 140 may execute 13:00

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automation process on a desktop application that 13:00
is executed on a non-sandbox operating system 13:00
such as Windows or Linux. An agent may be 13:00
installed on the user device. The agent may 13:00
access other applications including the UI 13:00
elements, manipulate such elements and create 13:00
new elements." 13:00
Q. In the passage you just read, does 13:00
it use the word "computer program" in haec 13:00
verba; literally, the words "computer" with the 13:00
word "program" and nothing other than "computer 13:00
program"? 13:00
MS. NGUYEN: Objection, form. 13:00
A. So you're asking if it is literally 13:00
saying "computer program" -- 13:01
Q. Correct. 13:01
A. And there is no "computer" followed 13:01
by "program" in this passage. 13:01
Q. Okay. The next passage I want you 13:01
to go to is in column 5. And in column 5, if 13:01
you would read starting with, "The target 13:01
system," on line 6 through the end of that 13:01
paragraph on line 13. 13:01
A. "The target system, generally 13:01

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referred to as the computer program, may be a 13:01
website, a web-based system, a native mobile 13:01
application, (example, executed in a protected 13:01
sandbox), a desktop application, (example, 13:01
executed in a process of non-sandbox operating 13:01
system) or the like. The target system may have 13:01
a user interface such as a graphical user 13:02
interface, GUI, that the user may utilize in 13:02
order to activate the functionalities of the 13:02
target system." 13:02

Q. And in that passage, you do see the 13:02
words "computer program" as "computer program," 13:02
right? 13:02

MS. NGUYEN: Objection, form. 13:02

A. I see the "computer program" in one 13:02
place. 13:02

Q. Now, I want you to go through lines 13:02
37 through 51, but I suggest we start at line 34 13:02
for completeness. 13:02

A. Ending where? At the end of the 13:02
paragraph? 13:02

Q. No, I think in 51, it ends at 13:02
"underlying platform." 13:02

A. Okay. 13:02

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Q. But if you want, you can do the 13:02
whole paragraph, from line 34 to line 61 and 13:02
tell me if you see the word -- well, first let's 13:03
read it into the record. 13:03
A. "In some cases, adoption of new 13:03
software may be a challenge to companies. 13:03
Enterprises may use many different software 13:03
tools for different purposes such as HR, 13:03
customer relation management, CRM, finance, task 13:03
management, project planning or the like. 13:03
Integration of a new system into an organization 13:03
may be a challenge as it may require migrating 13:03
large amounts of employees to new platforms 13:03
requiring that the users be trained in using the 13:03
new system. 13:03
"A chatbot, on the other hand, may 13:03
abstract away the actual system. Instead of 13:03
relying on the user's familiarity with the 13:03
system, the automation process may be in charge 13:04
of the actual use of the system. The chatbot 13:04
may simply extract the user's intention, 13:04
identify the relevant action to be performed, 13:04
and extract relevant information to be used as 13:04
part of the automation process." 13:04

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Should I go on to the next 13:04
paragraph? 13:04
Q. Yes, I think you have to keep going 13:04
unfortunately. 13:04
A. "Another technical problem may be to 13:04
enable defining automation processes in a manner 13:04
that enables them to be implemented even if 13:04
changes are performed to the underlying 13:04
platform. For example, it may be desired that 13:04
the automation process will continue working 13:04
even in the face of layout modifications of the 13:04
front end of the program or website. In some 13:04
cases, it may be desired to be able to identify 13:04
elements selected during definition of the 13:04
automation process during execution thereof. 13:05
"The identification may be a 13:05
nontrivial task if no unique identifier exists 13:05
as may be the case in many instances. Still it 13:05
may be desired to be able to identify such 13:05
elements correctly so as to apply the actions 13:05
defined by the automation process." 13:05
Q. And in the passages of the two 13:05
paragraphs that you just read from column 5, did 13:05
you see literally the word "computer program" 13:05

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anywhere in either of those two paragraphs? 13:05

MS. NGUYEN: Objection, form. 13:05

A. In these two paragraphs, the phrase 13:06
computer program is not -- 13:06

Q. Not in there? 13:06

A. Not in there. 13:06

Q. Now I'm going to jump to column 21, 13:06
please. 13:06

Actually, I'll come back to that in 13:06
a second. 13:06

Let's go to column 19 first. So in 13:06
column 19, starting on line 60, can you read the 13:06
first sentence? 13:06

A. "The present invention may be a 13:06
system, a method and/or a computer program 13:07
product." 13:07

Q. So is it your understanding that a 13:07
computer program product being discussed on 13:07
column 19, line 60 is referring to the present 13:07
invention? 13:07

MS. NGUYEN: Objection, form. 13:07

A. It is saying that the present 13:07
invention may be a system, a method and/or a 13:07
computer program product. So that's one of the 13:07

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possibilities. 13:07

Q. Right, and it is using the words 13:07
"computer program product" in contrast to 13:07
"computer program," right? 13:07

MS. NGUYEN: Objection, form. 13:07

A. It's using computer -- a computer 13:07
program product in this sentence. 13:07

Q. Right. And earlier when we saw the 13:07
word "computer program," it was in connection 13:07
with the target system, right? Column 5? 13:07

MS. NGUYEN: Objection, form. 13:07

Q. The target system is generally 13:07
referred to as a computer program, right? 13:07

A. It says that in column 5. 13:07

Q. And is the target system, in your 13:07
opinion, the present invention? 13:08

MS. NGUYEN: Objection, form. 13:08

Q. Are you looking at Beigi Exhibit 28? 13:09

A. 27. 13:09

Q. 27. Okay. 13:09

A. But I can look at 28, the same. 13:09

Q. Well, I was going to say if you are 13:09
looking at 28, you discuss this paragraph in 13:09
paragraph 13, if that's what you are looking 13:10

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for. 13:10
A. Thank you. 13:10
Q. You will see you don't quote the 13:10
sentence we're discussing. You start with the 13:10
next sentence, the second word. 13:10
A. Could you ask the question again, 13:10
please. 13:10
Q. Is the target system in your opinion 13:10
the present invention? 13:10
MS. NGUYEN: Same objection. 13:11
A. With respect to -- 13:11
Q. The '732 patent, claim 1? 13:11
A. Line 60 of 19 -- column 19, that's 13:11
where we -- the context was, right? 13:11
"The present invention may be a 13:11
system, a method, and/or a computer program 13:11
product," so computer program product, you know, 13:11
it can be a computer program and if we saw in 13:11
the previous passage that it's a computer 13:11
program may be the target system, then we can 13:11
say that the target system may be a computer 13:11
program product, and in that sense, the present 13:11
invention may be a system, a method and/or a 13:11
program. A computer program product then says 13:11

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that the target system will be -- may be the 13:11
present invention. 13:12
Q. So just to be clear, your opinion is 13:12
that when the '732 patent is referring to a 13:12
target system, it is the present invention which 13:12
is within the scope of the claims as the 13:12
invention of the '732 patent? That is your 13:12
testimony? 13:12
MS. NGUYEN: Objection, form. 13:12
A. No, what my statement was was that 13:12
if you start from the other statement that you 13:12
had in the other column, which was an example 13:12
where a computer system -- I'm sorry, a computer 13:12
program is a target system which you were 13:12
relating to, right, that's passage you were 13:12
relating to, a computer program is the target 13:12
system? 13:12
And now you are saying in this case, 13:12
it says, "The present invention may be a system, 13:12
a method and/or a computer program product." 13:13
So it leaves it open to be this 13:13
general -- so a target system is a form -- it 13:13
can be a computer program, but a computer 13:13
program is not necessarily a target. The 13:13

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target. A computer program is not necessarily 13:13
the target system. 13:13
We can't just equate it in one 13:13
passage and come back here and say since, oh, we 13:13
said in that case, a computer program is the -- 13:13
may be the target system, then come back here 13:13
and say because it says the invention may be a 13:13
system, method and/or computer program product, 13:13
that then computer program product, a computer 13:13
program is a generic term. 13:13
So you can still have the present 13:13
invention be a computer program or computer 13:14
program product without having to be a target 13:14
system. I was saying in condition. If your 13:14
computer -- that same computer program that we 13:14
are talking about here, if it is this -- are 13:14
you -- 13:14
Q. We are not talking about a computer 13:14
program. We are talking about a computer 13:14
program product. 13:14
A. A computer program product is a 13:14
product that is made up of a computer program. 13:14
Q. So look at claim 11 and the 13:14
preamble. Is a computerized apparatus in the 13:14

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preamble of claim 11 a computer program product in your opinion? 13:14 13:14

A. One second. Which claim is it now? 13:14

Q. Claim 11 of the '732 patent in column 23. 13:14 13:14

MS. NGUYEN: Objection, form. 13:14

A. And what are we looking at? 13:14

Q. The preamble says "A computerized apparatus." 13:14 13:14

Do you understand that a computerized apparatus is a computer program product as you are referring to it from the specification? 13:14 13:14 13:15 13:15

A. A computerized -- a computerized apparatus is -- a computerized apparatus is an apparatus. So the apparatus is more general than a program. An apparatus could be actually a device, an apparatus. An apparatus could be both a device and software. 13:15 13:15 13:15 13:15 13:15 13:15

Q. Well, it specifically is device and software? 13:15 13:15

MS. NGUYEN: Objection, form. 13:15

Q. Is that not the computer program product in your mind? 13:15 13:15

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A. I'm saying that a computerized 13:15
apparatus may be the device, right? It is a 13:15
device. 13:15
Q. It is the device. It says, it's a 13:15
device. 13:15
A. You are asking me whether it's a 13:15
computer program. I'm saying it's a device. 13:15
Q. I'm saying is it a computer program 13:15
product. A computer product program is not 13:15
necessarily the software. It is the product 13:15
incorporating the software, right? 13:15
MS. NGUYEN: Objection, form. 13:16
A. It can be. That's one possibility. 13:16
But it's more general than that. 13:16
Q. Why don't you read the next sentence 13:16
from column 19 where it says, "The computer 13:16
program product may include," 19, line 61, "the 13:16
present invention may be a system, a method or 13:16
computer program product," it continues. 13:16
A. The computer program product may 13:16
include a computer readable storage medium or 13:16
media having computer readable program 13:16
instructions thereon for causing a processor to 13:16
carry out aspects of the present invention. 13:16

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So basically what this is saying is 13:16
that the computer program product may include as 13:16
part of it a readable storage medium such as a 13:16
disk or CD or media, having computer readable 13:16
program instructions, computer program, for 13:17
causing a processor to carry out aspects of the 13:17
invention. 13:17
So basically the computer program 13:17
product may, in this case, may include a medium 13:17
on which you have a computer program. That's 13:17
what it says. 13:17
Q. Like the coupled memory in claim 11? 13:17
MS. NGUYEN: Objection, form. 13:17
A. Like what? 13:17
Q. The coupled memory in claim 11, line 13:17
27. "The apparatus comprising a processor and 13:17
coupled memory. The processor being adapted to 13:17
perform the steps of the claim." 13:17
A. So this claim is, in my opinion, 13:18
the -- basically is putting the limitations that 13:18
were described in claim 1 into -- lumping it 13:18
together in an apparatus. 13:18
Q. Or a computer program product which 13:18
has memory and instructions stored thereon? 13:18

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A. So it's expanding. It's, like we said, the computer program product is the general term which could be a computer program, as we just saw, and it would be a computer program on a medium, right? 13:18

Or it could be a computerized apparatus for defining an automation process. So it could be an apparatus, the device. 13:18 13:19 13:19

Q. Right. And it's the apparatus which is carrying out the present invention, right? 13:19 13:19

MS. NGUYEN: Objection, form. 13:19

A. But it doesn't say that this is the computer program product. Right. 13:19 13:19

Q. I'm asking you whether you think it is a computer program product, according to the disclosure of the '732 patent. 13:19 13:19 13:19

A. I would say it's more the system. Because remember, it says, if you go back to what we were just looking at, which was 19, right? 13:19 13:19 13:19 13:19

It says, "The present invention may be a system." I would say that's more a system, because it's the whole system. So a "computer program product" emphasizes "computer program" 13:19 13:19 13:19 13:19

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in it. So this is just computer program. 13:20
You may provide it on a medium like 13:20
a CD and it actually clarifies later, right? 13:20
But I think in this case, it would 13:20
be the system. It's still under the same 13:20
patent. But I would say a computerized 13:20
apparatus is a system. 13:20
Q. So if you look at claim 18, it's 13:20
directed to a non-transitory computer-readable 13:20
medium, which would be your memory, as I 13:20
understand it. 13:20
Do you agree? 13:20
MS. NGUYEN: Objection, form. 13:20
Q. And the memory has -- retaining 13:20
computer program instructions. Do you 13:20
understand that the program instructions on the 13:20
memory is the computer readable -- I am sorry, 13:20
the computer program product as discussed at 13:20
column 19? 13:20
MS. NGUYEN: Objection, form. 13:20
A. "A non-transitory computer readable 13:20
medium for defining an automation process 13:20
wherein the automation process" -- so this is a 13:20
medium where the computer program will be on. 13:21

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Q. Correct. 13:21
A. Yes. 13:21
Q. And that would be a computer program 13:21
product as discussed in column 19? 13:21
A. It could also be a computer program 13:21
product. I mean, not a computer -- it's, again, 13:21
as discussed in the medium presented, yes, in 13:21
that. 13:21
Q. Do you understand that the preamble 13:21
starting in lines 23 of claim 18 through line 29 13:21
where it says, "The processor to perform is with 13:21
respect to the computer program product which is 13:21
causing a processor to carry out aspects of the 13:21
present invention"? 13:21
A. Let me read this again. 13:21
MS. NGUYEN: Objection, form. 13:21
A. What was your question again? I'm 13:22
sorry. 13:22
Q. Do you understand that the preamble 13:22
portion of claim 18 starting with "A 13:22
non-transitory computer readable medium" going 13:22
down to "cause the processor to perform" is 13:22
referring to the computer program product that 13:22
causes a processor -- I'm sorry, the computer 13:22

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program product having computer readable 13:22
instructions thereon for causing a processor to 13:22
carry out aspects of the present? 13:22
MS. NGUYEN: Objection, form. 13:22
A. Sorry, just to be sure what I'm 13:22
equating, the computer readable medium which 13:22
retains the program instructions, hence, the 13:22
computer program or computer program product in 13:23
whole because it is, as they discussed, it is 13:23
computer program -- the computer readable medium 13:23
retaining program instructions. So that's 13:23
computer program. Computer program product. 13:23
Q. Right. 13:23
A. Is that what you are asking? 13:23
Q. Yes. 13:23
A. Yes. 13:23
Q. And when it says "caused the 13:23
processor to perform," it then has the same 13:23
defining, associating and publishing steps, 13:23
right? 13:23
A. It seems like these the same 13:23
steps -- 13:23
MS. NGUYEN: Objection to form. 13:23
A. It seems like they are the same 13:23

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steps. I have to reread to make sure they are 13:23
in indeed the same, but conditioned upon that, 13:23
the wording is the same. 13:23
Q. I will represent to you that the 13:23
read you gave in your report cross-referenced 13:23
claim 1 for this element? 13:23
A. I do know that. But since I'm 13:23
sitting here and I have to be sure what I am 13:23
agreeing to, I need to-- that's why I said if 13:23
they are the same, then it's fine. 13:24
Q. So -- 13:24
A. I'm conditioning it based on that, 13:24
if the wording is the same. 13:24
Q. So to the extent that column 19, 13:24
line 60 through 65, refers to the computer 13:24
program product as having computer readable 13:24
program instructions for causing out a processor 13:24
to carry out aspects of the present invention, 13:24
would you understand that the defining, 13:24
associating and publishing steps as set forth in 13:24
claim 18 are the aspects of the present 13:24
invention which are being carried out by the 13:24
computer program product in the preamble? 13:24
A. By the -- 13:24

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MS. NGUYEN: Objection, form. 13:24

Please, Dr. Beigi, let me object. 13:24

A. By the computer program -- 13:24

Q. Product? 13:24

A. No, by the computer program, which 13:24
is being delivered using a medium, you need to 13:24
deliver the program somehow, and this is the 13:24
limitation, the non-transitory system that 13:25
basically is -- and what they have discussed 13:25
here is a medium that delivers the computer 13:25
program; hence, the computer program product. 13:25
Right. Because that's what it says here, right. 13:25

It goes the computer readable 13:25
storage medium can be a tangible -- I am sorry, 13:25
is that the one? 13:25

The computer program product may 13:25
include a computer readable storage medium or 13:25
media having computer readable program -- 13:25
readable program instructions thereon for 13:25
causing a processor to carry out. 13:25

So you don't sell a CD which is 13:25
empty, blank. You sell a CD with the computer 13:25
program instructions on it. And the computer 13:25
program product is the shrink wrap that the CD 13:25

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which has the computer programming. 13:25

So the computer program product in 13:25

this case is a computer program. It's just a 13:26

delivery system for -- the way it's discussed in 13:26

here, right? The delivery system for presenting 13:26

it. 13:26

Q. In your example, it's the memory and 13:26

the software together make a computer program 13:26

product? 13:26

MS. NGUYEN: Objection, form. 13:26

A. Let's not use memory. 13:26

Q. The CD? 13:26

A. The CD is not just any memory, 13:26

right, it's -- yeah, it is one -- it's a medium 13:26

basically, it's a media. 13:26

So the CD which basically has the 13:26

computer program, it's just a medium for 13:26

presenting it to whoever takes it, an alternate 13:26

medium as we see these days because there are 13:26

many other ways to get it downloaded, right. 13:26

So if the program is the same, 13:26

that's the important. The product is the 13:26

computer program basically. 13:26

Q. Right, so the computer program 13:26

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product is not the program itself. It's the CD 13:26
with the program on it that make the computer 13:26
program product, correct? 13:27
MS. NGUYEN: Objection, form. 13:27
A. So the computer program is the 13:27
important thing being provided. 13:27
What we are talking about -- the CD 13:27
doesn't do anything. The CD is just a medium. 13:27
So the way it's discussed here, there are only 13:27
two things. A medium and a program instruction. 13:27
Program instructions are the program. The 13:27
medium is the way you present this to whoever 13:27
gets it. 13:27
Q. But when it talks about computer 13:27
program in column 5, it's tying it to the target 13:27
system. When it talks about a computer program 13:27
product, it's talking about the medium and 13:27
program instructions, not the word "computer 13:27
program," correct? 13:27
MS. NGUYEN: Objection, form. 13:27
A. It depends on which claim are we 13:27
talking about. In claim 18 -- 13:27
Q. No, in the body, in claim 19, in 13:27
column 19 where you're quoting to -- the present 13:27

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invention may be a system, method or computer 13:28
program product, it defines the computer program 13:28
product may be a computer-readable storage 13:28
medium or media, like your CD, having 13:28
computer-readable program instructions thereon 13:28
for causing the processor to carry out the 13:28
present invention. 13:28
It doesn't call it a computer 13:28
program. It calls it computer-readable program 13:28
instructions right? It's using a different 13:28
word. 13:28
MS. NGUYEN: Objection, form. 13:28
A. I think it's a packaging term. I 13:28
think what it's trying -- because it does talk 13:28
about the different ways-- it does talk about 13:28
the program itself in claim 1, it talks about 13:28
the non-transitory, which is talking about here, 13:28
and it talks about an apparatus which is 13:28
basically a system, right, because it talks 13:28
about all the different -- that's why it says a 13:28
system, a method, a computer program product. 13:28
So it's trying to cover these three, 13:28
in the three variations of the same claim. 13:28
Q. And in your example, the CD with 13:29

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computer program instructions on it, right, it is a combination that make up the computer program product? 13:29

A. Sorry, say it again. 13:29

Q. It is the combination in the CD of the CD plus the instructions that make up the computer program product in the language of the '732 patent on column 19, line 60 through 65. 13:29

MS. NGUYEN: Objection, form. 13:29

A. In the example because it says may "include a computer-readable storage medium," may include. It may be a downloadable form. Maybe -- basically we know that we can deliver programs in many different ways, right? That's a known thing to everybody. 13:29

Q. What's the combination? 13:29

A. In this case, it says maybe, maybe is one example. That's, to me, when you say may be, that means it may be other things too. And that's why it says the system, the method, a computer program product and a computer program product itself may be a medium containing the computer program on it. 13:29 13:30 13:30

Q. But it always requires the medium in 13:30

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addition to the software? 13:30

MS. NGUYEN: Objection, form. 13:30

Counsel, please let him finish. 13:30

A. So what I'm reading here is that the 13:30
computer program product may include a computer 13:30
readable -- it could have other things too. It 13:30
may have a manual. It may have -- because we 13:30
are going right to that level, then it may have 13:30
an agreement. It may have a lot of things. 13:30

It's a computer program product, an 13:30
example of a computer program product which the 13:30
main thing is the computer program. It may have 13:30
it may have -- it may be presented, let's say, 13:30
in -- may include a computer-readable storage 13:30
medium and we can read this in context of claim 13:31
18, right, because we just looked at some -- 13:31

Q. I want to stick with what I was 13:31
asking please. 13:31

A. I'm reading claim 18, too. 13:31

At the beginning, it says, 13:31
non-transitory computer-readable medium which is 13:31
exactly what they are describing here for 13:31
defining an automation process. So basically 13:31
the non-transitory computer-readable medium for 13:31

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defining contains the program on it. 13:31

Q. Program instructions? 13:31

A. Program instructions. 13:31

Q. Not computer program, the program 13:31
instructions, right? 13:31

MS. NGUYEN: Objection, form. 13:31

Q. Claim 18, on line 28, it says 13:31
program instructions. And on line 27, it says, 13:31
program instructions, not computer program, 13:31
right? 13:31

MS. NGUYEN: Objection. 13:31

A. I don't see why there is a 13:32
difference between program instructions and 13:32
computer program. A computer program is a set 13:32
of instructions. 13:32

So program -- are you talking about 13:32
just -- 13:32

Q. The literal -- 13:32

A. -- literally the words? 13:32

Q. Literally the words. When it wants 13:32
to talk about the instructions that are stored 13:32
on the non-transitory, computer-readable media, 13:32
the language that's being used is "program 13:32
instructions" not "computer program," is that 13:32

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correct or not correct? 13:32

A. In this case, it is. In 18, I'm 13:32

looking at. 13:32

Q. And does claim 18 refer to a 13:32

computer program? 13:32

A. Well, I think it does because it 13:32

says, again, like I said, program instructions. 13:32

So to me, the program instructions are a 13:32

computer program. 13:32

MS. NGUYEN: Objection to form. 13:32

Please let him finish. 13:32

Q. Literally. I mean, literally. 13:32

I'm directing you if you look at the 13:32

associating step, it literally says, "configured 13:33

to displayed user interface of a computer 13:33

program." 13:33

Do you see that? 13:33

A. I see that. 13:33

Q. That's the word "a computer 13:33

program," correct? 13:33

A. Yes. 13:33

Q. Is a computer program the same or 13:33

different computer program than "program 13:33

instructions"? 13:33

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MS. NGUYEN: Objection, form. 13:33

Q. In the context of claim 18 of the 13:33
'732 patent? 13:33

Do you my question? 13:33

A. I understand your question. 13:33

So these are program instructions 13:33
that in claim 18 preamble, it says, "The 13:33
non-transitory, computer-readable medium 13:33
retaining program instructions," I'll read it in 13:33
light of "the computer program product may 13:33
include a computer-readable storage medium 13:34
having computer-readable program instructions 13:34
thereon for causing the processor to carry out 13:34
aspects of the present invention." 13:34

Again, in 18 preamble, "which 13:34
program instructions when read by a processor 13:34
cause the processor to perform," and then it is 13:34
talking about everything that we talked about 13:34
before. 13:34

So if we go back to claim 1 because 13:34
we have to -- right? 13:34

Q. Claim 18 stands on its own, so you 13:34
can stick with claim 18. 13:34

A. I understand that, I understand 13:34

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that. It was your words -- 13:34

MS. NGUYEN: Objection. 13:34

A. -- that defining, association, 13:34

assisting and publishing are exactly the same, 13:34

identical words. 13:34

So I can look at the two claims 13:34

together and compare them. Can't I compare 13:34

them? 13:34

Q. You can do whatever you want, but my 13:34

question is whether the computer program -- 13:35

whether a computer program in the context of 13:35

utilizing a displayed user interface of a 13:35

computer program is the same software as the 13:35

programming instructions which the 13:35

computer-readable medium retaining program 13:35

instructions is referring to in the preamble -- 13:35

MS. NGUYEN: Objection. 13:35

Q. -- of claim 18? 13:35

MS. NGUYEN: Objection, form. 13:35

A. I believe that the -- when it says 13:35

program instruction, computer-readable medium 13:35

retaining program instructions, which program 13:35

instructions, when read by a processor, caused 13:35

the processor to perform, is going back to an 13:35

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implementation of a method -- I'm looking at 13:35
claim 1 now -- a method for defining an 13:35
automation. 13:35
It's a method and it's implemented 13:35
in the form of a computer program and it's put 13:36
on a device and it's sent to you, very clear. 13:36
That's what it is. 13:36
Q. But that's not my question. 13:36
I'm trying to understand whether if 13:36
I were to read this claim on a device, am I 13:36
reading the program instructions which are in 13:36
the preamble on the same piece of software or a 13:36
different piece of software than the -- a 13:36
computer program where you have the display -- 13:36
A. Sorry, you lost me. 13:36
Q. -- a displayed user interface of a 13:36
computer program? 13:36
A. You lost me completely. You are 13:36
talking about reading instructions on a piece of 13:36
software and I'm lost here now. 13:36
Q. Well, you have applied claim 18 to 13:36
prior art? 13:36
A. Not in the way that you're stating 13:36
it. 13:36

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Q. Oh, you didn't? 13:36

A. Not the way you're stating -- the 13:36
words are wrong. 13:36

You're saying reading the computer 13:36
program instructions into a software. You are 13:36
making up stuff. Where is that? Can you show 13:36
me? You are making up stuff. Don't -- please 13:36
be literal. 13:37

Q. Is it in your opinion that program 13:37
instructions are software? 13:37

MS. NGUYEN: Objection, form. 13:37

A. Program instructions may be looked 13:37
at as a software. 13:37

Q. Whatever program instructions are in 13:37
the context of claim 18, is it the same software 13:37
or different software than later on in the 13:37
associating step where it refers to a displayed 13:37
user interface of a computer program? 13:37

MS. NGUYEN: Objection, form. 13:37

A. My understanding is that the program 13:38
instructions are the method. I stated that, 13:38
very simply, and that's why I am going to claim 13:38
1. 13:38

The automation -- a method for 13:38

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defining an automation process, that methodology 13:38
in a programmatic fashion is being distributed 13:38
on a non-transitory, readable medium in the form 13:38
of program instruction which is a program. 13:38
That's very simple. 13:38
I don't -- all this -- I'm sorry, I 13:38
just get confused what -- like when you try to 13:38
reshape everything and use all sorts of other 13:38
lingo here. 13:38
It's a very simple thing. These two 13:38
claims are parallel claims. I know they're 13:38
independent claims, but they're parallel claims 13:39
because majority of them are identical. You 13:39
said that. Right? 13:39
So the defining, the 13:39
associating, the publishing is identical between 13:39
18 and 1. 13:39
The only difference is in the 13:39
preamble. The preamble if you look at the first 13:39
thing is talking about a method for defining an 13:39
automation process wherein the automation 13:39
process is configured to be invoked in response 13:39
to a conversation of a user with a natural 13:39
language interface, the method comprising. 13:39

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And here in 18, we are saying a 13:39
non-transitory computer-readable medium for 13:39
defining an automation process, we are saying 13:39
the same thing, wherein the automation process 13:39
is configured to be invoked, using similar 13:39
words, in response to a conversation of a user 13:40
with a natural language interface, yet using 13:40
similar words, the non-transitory 13:40
computer-readable medium, implementation of the 13:40
automation, retaining program instructions, this 13:40
retaining -- this medium which retains program 13:40
instructions, those program instructions are the 13:40
implementation of what is being discussed in 13:40
claim 1. It's just an implementation of that, 13:40
which program instructions when read by a 13:40
processor cause the processor to perform exactly 13:40
the same identical thing as the body of claim 1. 13:40
Q. Turn to column 11. 13:40
You cite lines 15 through 21. In 13:40
those lines, it says -- and you can follow along 13:40
with me and tell me if I make a mistake. 13:40
A. One second. 11, 15. 13:40
Q. It says, "The automation process may 13:40
be executed on the client device. In some 13:40

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exemplary embodiments, the user may a priori 13:41
install a computer pro program product on her 13:41
client device such as a desktop agent, a browser 13:41
extension or the like to enable execution of the 13:41
automation process for target programs and 13:41
systems that do not provide direct support for 13:41
the" -- 13:41
A. That do provide. 13:41
Q. I'm sorry, "that do provide direct 13:41
support for the disclosed subject matter." 13:41
Do you see that? 13:41
A. Yes, I see that. 13:41
Q. Do you see the word "computer 13:41
program" in contrast to "computer program 13:41
product" in the passage I just read? 13:41
MS. NGUYEN: Objection, form. 13:41
A. Which computer program are you 13:42
referring to? I'm sorry. 13:42
Q. I'm suggesting it does not use the 13:42
word "computer program" in that passage. 13:42
Do you agree? 13:42
A. But like I said, computer program 13:42
product, in fact, in here, it says the 13:42
automation process may be executed on the client 13:42

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device. 13:42
"In some exemplary embodiments, 13:42
which it provides," the user may a priori 13:42
install a computer program product" medium, like 13:42
we said, having the product on it, "on her 13:42
client device, such as a desktop agent, a 13:42
browser extension, or the like, to enable 13:42
execution of automation processes for target 13:42
programs and systems that do provide direct 13:42
support for the disclosed subject matter." 13:42
So again, implementation of what the 13:42
patent is trying to present as its independent 13:42
claim on a computer, on a program instruction 13:43
set, which is on a medium being sent to the 13:43
buyer. 13:43
Q. And that instruction set is referred 13:43
to as a computer program product, not a computer 13:43
program, in the context of the passage we just 13:43
read? 13:43
MS. NGUYEN: Objection, form. 13:43
A. Because you're getting a device, an 13:43
example that they gave, media, that has the 13:43
computer program on it. 13:43
Q. The program or the instructions? 13:43

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MS. NGUYEN: Objection, form. 13:43

A. Program instructions are a computer 13:43
program. The computer program is just a set of 13:43
instructions. It is a bunch of 1s and 0s which 13:43
are instructing the processor to do stuff. It 13:43
is -- the computer program is a set of 13:43
instructions. That is all it is. 13:43

Q. But a computer program product is 13:43
not a computer program. It is a computer 13:43
program product that may include instructions 13:44
that you equate to the computer program, but it 13:44
is a different word with a different meaning, is 13:44
that correct? 13:44

MS. NGUYEN: Objection, form. 13:44

A. It seems to be a packaging term the 13:44
way you present it. 13:44

Q. In that passage, it distinguishes 13:44
between the computer program product and the 13:44
target programs and systems. 13:44

Do you see that? Line 20 is where 13:44
it refers to target programs and systems of 13:44
column 11? 13:44

MS. NGUYEN: Objection. 13:44

A. Okay, I'm sorry. I was just reading 13:45

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it between what am I looking for. 13:45

Q. In the passage we read, column 11, 13:45
line 15 to line 22, there is a difference 13:45
between a computer program product and target 13:45
programs and systems, correct? 13:45

MS. NGUYEN: Same objection. 13:45

A. So the program, the computer program 13:45
product which delivers the computer program, 13:45
which in terms of the two patents we were 13:45
looking at is implementing the automation 13:45
process, can run on a client device, in which 13:45
case you would get it and install it on the 13:46
desktop, for example, on a device such as a 13:46
desktop agent, a browser extension or the like. 13:46

So for example, if it's a browser 13:46
extension, then really you are not getting a CD 13:46
or a DVD, right? You're getting it -- it's 13:46
giving you all sorts of possible ways of 13:46
receiving it. 13:46

But what is important, what is in 13:46
common there is the automation process which is 13:46
the computer program -- the computer program. 13:46

So a computer program product, 13:46
computer program here are the same. Because it 13:46

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is giving you all sorts of ways you can have it. 13:46
You can get it on your client device 13:46
such as your desktop agent, your browser 13:46
extension or the like to enable execution of an 13:46
automation process because it is the 13:47
implementation of the automation that was 13:47
defined by the patent, it enables execution of 13:47
the automation process for target systems and 13:47
systems that do provide direct support for the 13:47
disclose the subject matter, they provide direct 13:47
support for this. 13:47
Additionally or alternatively, in 13:47
the case of a target program that is supported 13:47
by the displayed subject matter, again, had to 13:47
be supported, such as a website already having 13:47
embedded therein relevant client code. No 13:47
installation of an additional client program may 13:47
be required. 13:47
So where it is using target is -- I 13:47
mean it is for target -- it's to execute an 13:47
automation process or processes for target 13:47
programs and systems, target programs and 13:47
systems are the things you want to do the 13:48
automation on. 13:48

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Q. They're not the automation process, 13:48
they're the target of the automation process? 13:48
A. The target of the automation 13:48
process. 13:48
Q. They're different than the software 13:48
that is implementing the defining, associating 13:48
and executing steps? 13:48
MS. NGUYEN: Objection, form. 13:48
A. May or may not be because it doesn't 13:48
say -- it just says for the target programs and 13:48
systems. 13:48
It could contain -- it could be 13:48
something that it provides in the program. They 13:48
could provide a target in the program as well. 13:48
I'll give you an example. I could 13:48
give you a training version where you run it on 13:48
your device, it does everything locally on that 13:48
thing and it's part of the program that they 13:48
provide to you. I'm sure that would be, you 13:48
know, a proper way of presenting the software. 13:48
So that's why you can't say target 13:48
system is not. Could be or it could not be. We 13:48
have both possibilities. 13:49
MS. NGUYEN: Can we take a break. 13:49

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MR. MACEDO: Sure. 13:49

(Recess) 13:49

Q. Dr. Beigi, are you ready to 13:58
continue? 13:58

A. Yes. 13:58

Q. Is there any reason why you can't 13:58
testify now truthfully and honestly and to the 13:58
best of your ability? 13:58

A. No. 13:58

Q. Okay. So now, we are still looking 13:58
at the '732 patent, and I want you to turn to 13:59
column 14, and you cited line 34 through 38. 13:59

And so I want you to read -- I would 13:59
start where it says, "A conversation...," do you 13:59
see that? 13:59

A. 34 to -- 13:59

Q. You cited 34, but the beginning of 13:59
the paragraph begins in 33, where it says, "A 13:59
conversation that is made...?" 13:59

Do you see that? 13:59

A. '732 -- column 14? 13:59

Q. Column 15. 13:59

A. Oh, that's why I am not finding it. 13:59
15. 13:59

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Q. Lines 34 through 38 is what you 13:59
cited, but I want you had to start with "A 13:59
conversation," which is line 33 and go to the 13:59
end of the second paragraph where it says, "the 13:59
disclosed subject matter." 13:59
Do you see that? The two 13:59
paragraphs? 13:59
A. Yes. 14:00
Q. And can you read those into the 14:00
record? 14:00
A. "A conversation that is made 14:00
published may be updated in a database that 14:00
provides the information of the conversation for 14:00
implementation by bots that are determined to be 14:00
able to perform said conversation. Referring 14:00
now to figure 5B, showing a schematic 14:00
illustration of a user interface in accordance 14:00
with the disclosed subject matter." 14:00
Q. And you don't see anywhere in there 14:00
the use of the word "computer program," correct? 14:00
A. No, I don't. The phrase "computer 14:00
program." Exactly. 14:00
Q. Right. Now, let's turn to column 14:00
21, and lines 24 through 32 are cited, and this 14:00

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is the portion where they're talking, instead of 14:01
about a computer program, they're talking about 14:01
the computer-readable program instructions. 14:01
Do you see where I'm referring to? 14:01
A. I do. 14:01
Q. And I understand that it refers to 14:01
computer-readable program instructions. But 14:01
what I want to know is does there anywhere in 14:01
column 21, lines 24 through 32, where they use 14:01
the word "computer program" as "computer 14:01
program"? 14:01
MS. NGUYEN: Objection, form. 14:01
Q. Do you understand my question? 14:01
A. Yes. The literal -- 14:01
Q. The literal words "computer 14:01
program"? 14:01
A. The literal phrase "computer 14:01
program" is not in this paragraph. 14:01
Q. Okay. Thank you. 14:01
Okay, so let's turn to the 317 14:01
patent for a minute. We had marked it as Beigi 14:01
Exhibit 10. 14:02
A. That doesn't help me. I have to 14:02
find it anyhow. 14:02

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Q. I understand. That's for the record 14:02
that I did that. 14:02
A. Yes. 14:02
Q. I think it is a little lower. 14:03
There you go. 14:03
So you're looking at Beigi Exhibit 14:03
10, the '317 patent, correct? 14:03
A. Yes. 14:03
Q. And you are going to turn to claim 7 14:03
on column 26 all the way at the end. 14:03
A. Okay. 14:04
Q. In claim 7, it talks about the 14:04
chatbot program product of claim 1 where the 14:04
chat -- "wherein the chatbot program product is 14:04
configured to utilize credentials of the user 14:04
whereby the chatbot is privy to user-specific 14:04
information." 14:04
Do you have an understanding, first 14:04
of all, who the user -- 14:04
A. Sorry, where did you read that? 14:04
Q. Claim 7. 14:04
A. Hold on, I'm sorry, I missed that. 14:04
Yeah, I read it properly. But 14:04
"wherein the chatbot program product is 14:04

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configured to utilize credentials of the user," 14:04
okay, yes, go ahead. 14:04
Q. Now, do you understand who the user 14:04
is in claim 7 with respect to claim 1? 14:04
MS. NGUYEN: Objection, form. 14:04
A. Because it is a continuation of 14:05
claim 1, the user should be referring to the 14:05
first part of like basically 1A, "receive a user 14:05
instruction from a user," so that's a user. 14:05
Q. "A user using a natural language 14:05
interface"? 14:05
A. Yeah. 14:05
Q. So the user is the person chatting 14:05
with the chatbot? 14:05
A. Yes. 14:05
Q. And that user, according to claim 7, 14:05
has credentials? That's your understanding? 14:06
A. Yes. 14:06
Q. What are credentials in the context 14:06
of claim 7 of the user? 14:06
A. Things related to the user, 14:06
information related to the credentials. 14:06
Q. As a computer scientist, would you 14:06
understand that to be a file with information 14:06

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about the user? Or the equivalent? 14:06

A. Only? 14:06

Q. As an example. Let's start with it 14:06

as an example. 14:06

A. A file that is associated with a 14:06

user can be a credential for the user. 14:06

Q. Okay. 14:06

A. As an example. But a very limited 14:06

example. 14:06

Q. In the context of -- this is a chat 14:06

program product or we can talk about any 14:06

computer program product which is configured to 14:06

utilize credentials, would you understand that 14:07

that means it is configured to access some sort 14:07

of data that is held in a file or something 14:07

that's the equivalent which contains those 14:07

credentials? 14:07

MS. NGUYEN: Objection, form. 14:07

A. Not necessarily. It says utilize 14:07

credential of the user. 14:07

Q. How would a chat program product, in 14:07

your experience as a computer scientist, utilize 14:07

credentials of a user? 14:07

I'm sorry. How would a chat program 14:07

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product, in your experience as a computer 14:07
scientist, be configured to utilize credentials 14:07
of the user in the context of the '317 patent? 14:07
MS. NGUYEN: Objection, form. 14:07
A. Who how would a computer program -- 14:07
Q. Product. 14:07
A. Product or computer program -- 14:07
Q. Well, it's a chat program product, 14:07
so I don't want to distinguish -- I don't want 14:08
to differentiate. 14:08
A. It's a chatbot, it's a chatbot. 14:08
Q. How would a chatbot? 14:08
A. Right, a chatbot. 14:08
Q. Be configured to utilize credentials 14:08
of the user in the context of the 317 patent? 14:08
A. So the chatbot -- 14:08
MS. NGUYEN: Objection, form. 14:08
A. The chatbot is configured to use 14:08
credentials of the user. How? By using, 14:08
utilize by using the credentials. 14:08
So you say use this credential of 14:08
the user, whereby the chatbot is previous -- so 14:08
at this point, it just says wherein the product 14:08
configured to utilize credentials. It doesn't 14:08

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say for what yet, right in this one point. So 14:08
utilize. That means you can use it. You can 14:08
use credentials of a user. Credentials are 14:08
anything related to the user. 14:08
Q. So if it was a chatbot with respect 14:08
to a bank product, would an example be using the 14:08
password of the user to access the bank product? 14:09
Would that be an example of credentials which 14:09
could be utilized in the context of claim 7? 14:09
MS. NGUYEN: Objection, form. 14:09
A. It can be many things. 14:09
MS. NGUYEN: Relevance. 14:09
A. It could be many things. It could 14:09
be -- if it's specifically that very example, 14:09
very limited example that you give, which is a 14:09
chatbot, facing who, the client? 14:09
Q. Facing the user which -- 14:09
A. Facing the client in this case, the 14:09
bank client. 14:09
Q. The bank client being the user, 14:09
sure. 14:09
A. The user, the bank client being the 14:09
user. The chatbot being the chatbot, we are 14:09
talking about, for example. Credentials are I 14:09

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do chats with my bank. I say hello. And then 14:09
they would say, you know, this is -- they would 14:09
ask me for my credentials. That's one way a 14:09
chatbot is using it, right. 14:09
The bank, using the chatbot -- it 14:09
could be on the main system. It could ask for 14:10
credentials and I could say -- for example, they 14:10
ask you could you please let me know your name 14:10
because they want to make sure that you're not 14:10
somebody else who is logged into this account. 14:10
They do that with me. I'm sure you've seen it, 14:10
too. 14:10
You call in, they say can you tell 14:10
me what your name is. And you say what your 14:10
name, well, what's your address, here is my 14:10
address. So these are my credentials. And then 14:10
they say, okay, you seem to be the right person 14:10
and then they continue with me. That's what 14:10
Bank of America and Citibank do for me. 14:10
Q. And when you give that information 14:10
in the chat that you just gave, is that the 14:10
chatbot being configured to utilize the 14:10
credentials of the user in your construction of 14:10
the claim? 14:10

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MS. NGUYEN: Objection, form. 14:10

A. The chatbot was configured -- if 14:10
it's an automated chatbot. If it's a person, 14:10
then different, right? 14:10

Q. This is a chatbot. 14:10

A. It's a chatbot. So the chatbot is a 14:10
machine. So it should be able to use that 14:11
information that I gave it which is configured 14:11
to utilize that information. It's asking for 14:11
that information which is configured. 14:11

The configuration is ask for that 14:11
information and get the information. That's, 14:11
that's configuration. Ask for the person's 14:11
name, that's it, that's the instruction and ask 14:11
for my name and I give it the name. 14:11

Q. Where it says, "Whereby the chatbot 14:11
is privy to user specific information," what do 14:11
you understand that to mean? 14:11

MS. NGUYEN: Objection, form. 14:11

A. Anything, anything that is specific 14:11
to that user. Any information that is specific 14:11
to that person, not to somebody else. 14:11

Q. And in the context of the '317 14:11
patent, you recognize that the claimed chatbot 14:11

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product in claim 1 is a different -- I'm sorry, 14:11
in the context of claim 1 of the '317 patent, 14:12
you recognize that a chat program product in 14:12
claim 1 is different than the web-based target 14:12
system in claim 1, correct? 14:12
MS. NGUYEN: Objection, form. 14:12
A. Can you ask the question? I read 14:12
that part. So I just want to -- 14:12
Q. In the context of claim 1 of the 14:12
'317 patent, do you recognize that the chatbot 14:13
program product in claim 1 is different than the 14:13
web-based target system in claim 1, correct? 14:13
MS. NGUYEN: Same objection. 14:13
Q. Do you understand my question? 14:13
A. I think I understand your question. 14:13
Q. Okay, go ahead. 14:13
A. So it says, "Determine to implement 14:13
an information process on a web-based target 14:13
system." So a web-based target system doesn't 14:13
specifically say that it has to be a different 14:13
thing. It can be a different thing. 14:13
Q. So when a claim has a chat program 14:13
product and a web-based target system, do you 14:13
understand that as a matter of patent law that 14:13

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they are to -- presumed to be two different 14:13
things? 14:13
MS. NGUYEN: Objection, form. Calls 14:13
for a legal conclusion. 14:13
A. I'm not a patent lawyer. I look at 14:13
the two and I see that one -- there are two 14:13
possibilities. I'm looking at this from the 14:14
viewpoint of a POSITA. I'm hoping that a POSITA 14:14
does not necessarily have to be a patent lawyer. 14:14
But, in that light, I'm looking at 14:14
this as one place talking about a chatbot 14:14
program product and then another place web 14:14
target -- web-based target system where that 14:14
web-based target system is being more specific. 14:14
That web-based target system could be anything. 14:14
It's a web-based target system. 14:14
So whether it's different from the 14:14
computer program -- so like I said, a web-based 14:14
doesn't necessarily have to happen outside. You 14:14
can have a web-based target system that resides 14:14
on the same computer and the instructions of 14:14
which are included in the same chatbot program 14:14
product. I gave you an example where they could 14:15
give you a training system where open the 14:15

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browser, run something locally on the device. 14:15
So that's why I'm being very 14:15
specific that a web-based target system may be 14:15
part of it or may be a separate one. 14:15
Q. And that's how you performed your 14:15
analysis for all three IPRs with the same type 14:15
of methodology where you didn't distinguish 14:15
between different words having different 14:15
meanings in the claims? 14:15
MS. NGUYEN: Objection, form. 14:15
A. That's such a blanket statement, no, 14:15
I don't -- I don't agree to that. Different 14:15
words meaning different things? 14:15
Q. Yes. 14:15
A. What is -- what are you -- you're 14:15
saying that I made my conclusion based on 14:15
different words meaning different things? 14:15
Q. No, meaning the same thing. 14:15
A. Different words meaning the same 14:15
thing? There are many words that can mean the 14:15
same thing. That's why we have a synonym 14:15
dictionary. 14:15
Q. Right. But in your analysis of the 14:15
claims, did you apply as a construction -- a 14:16

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construction maxim that different words should be construed to mean different things? 14:16 14:16

A. If they mean different things. 14:16

MS. NGUYEN: Objection, form. 14:16

A. If they mean different things, they mean different things. If they mean the same thing, then they mean the same thing. 14:16 14:16 14:16

If one is could be possibly looked at as two different -- in two different angles, then it has to be looked at in two different angles. 14:16 14:16 14:16 14:16

If a web-based target system may run in different forms, then you have to consider all the forms it may run. If I don't, I think I'm doing a disservice. 14:16 14:16 14:16 14:16

Q. And so for your analysis of claim 1 of the '317 patent, you do not require the chatbot program product be something different than the web-based program system, is that correct? 14:16 14:16 14:16 14:16 14:16

A. I didn't say that. 14:17

MS. NGUYEN: Objection, form. 14:17

A. I didn't say that. I corrected what you were stating which is the chatbot program 14:17 14:17

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product is different than the web-based target 14:17
system and I said you can't come to that 14:17
conclusion. 14:17
But that doesn't mean the opposite 14:17
has to be true. If you can't come to that 14:17
conclusion, it doesn't necessarily mean that the 14:17
opposite has to be true. 14:17
Q. And if the board were to say that 14:17
you must come to that conclusion, that a chatbot 14:17
program product means something different than 14:17
the web-based target system, would that be 14:17
consistent with the analysis that you applied 14:17
with respect to your opening declaration with 14:17
respect to the '317 patent? 14:17
MS. NGUYEN: Objection, form. 14:17
A. Please point me to that so I can 14:17
review my declaration. I can tell you whether 14:17
that is -- going to be within the same lines as 14:17
that. If they -- the hypothetical that you 14:17
gave. 14:18
Q. If you can't tell me sitting here 14:18
without spending hours going through your 14:18
declaration, I'll withdraw the question. 14:18
A. I'm not spending hours going through 14:18

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my declaration. You're asking me to refer to my 14:18
declaration -- 14:18
Q. No -- 14:18
A. -- and tell you something about my 14:18
declaration, opening statement of my 14:18
declaration, and you're asking me not to look at 14:18
it. 14:18
Q. I'm not telling you you can't look 14:18
at it. You have a copy of it in front of you. 14:18
I gave you -- I gave it to you, you have it. 14:18
A. Okay. 14:18
Q. I'm saying that there isn't a lot of 14:18
time left, so I don't want to spend a lot of 14:18
time on it and I'll withdraw my question if you 14:18
can't answer it without going back and looking 14:18
at your declaration. That's perfectly fine. 14:18
A. I can't answer without looking at my 14:18
declaration. 14:18
Q. Okay. We previously marked as Beigi 14:18
Exhibit 9 the IBM article that you referred to 14:18
earlier today talking about different kinds of 14:19
chatbots. 14:19
A. Yeah. 14:19
Q. And that article you invoked as 14:19

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being authoritative on what chatbots are, in 14:19
yesterday's deposition? 14:19
MS. NGUYEN: Objection. 14:19
Dr. Beigi, do you have that exhibit? 14:19
MR. MACEDO: We are getting it for 14:19
you. 14:19
MS. NGUYEN: Can we wait for the 14:19
exhibit. 14:19
MR. MACEDO: I'm asking him if he 14:19
recalls from yesterday invoking that -- 14:19
A. I recall invoking the definition of 14:19
a chatbot from that article. 14:19
Q. From the article. Right. 14:19
A. Not the whole article. I said I 14:19
liked the definition of chatbot given in that 14:19
article. 14:19
Q. Okay. So here is original Beigi 14:19
Exhibit 19. 14:19
A. Thank you. 14:19
Q. And -- 14:19
A. That's not the right thing. This is 14:19
the Khoros Staff. 14:19
Q. I am sorry? 14:20
A. Khoros Staff. I did not refer to 14:20

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this. I don't believe this is a proper -- I did 14:20
not like that. 14:20
Q. Okay. Well, I'll come back to that 14:20
in a minute while he goes and finds it. 14:20
I'm going to show you what we marked 14:20
during the break as Beigi Exhibit 41. 14:20
MS. NGUYEN: Sorry, Counsel, did you 14:21
say what you've marked as Exhibit 41? Is 14:21
the same as Exhibit 208? 14:21
MR. MACEDO: So, it's from the same 14:21
website. 14:21
MS. NGUYEN: It's a new exhibit? 14:21
MR. MACEDO: It's a new exhibit. 14:21
That's why I marked it 41. 14:21
MS. NGUYEN: The question with 14:21
respect to the authoritative -- 14:21
MR. MACEDO: I'm withdrawing it. 14:21
I'm starting over. 14:21
MS. NGUYEN: Thank you for the 14:21
clarification. 14:21
Q. We will mark as Beigi Exhibit 42 14:21
the -- Exhibit 2008. 14:21
(Exhibit 41, document entitled, 09:44
"Natural Language Processing" marked for 09:44

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identification, as of this date.) 09:44

(Exhibit 42, document entitled, 14:21

"What is a Chatbot?" marked for 14:21

identification, as of this date.) 14:21

A. So that I understands this is not 14:21

included in any of our prior references, either 14:21

side? 14:21

Q. Exhibit 42 is Exhibit 2008, which 14:21

she is handing you right now, and Exhibit 41 is 14:21

cross-referenced in Exhibit 42. 14:22

A. Okay. But 41 by itself has not been 14:22

used -- has not been used anywhere? 14:22

Q. Correct. 14:22

A. Yet? 14:22

Q. Right. It's one of the hyperlinks 14:22

-- 14:22

A. I understand -- 14:22

Q. -- from 42. 14:22

A. But it's not -- by itself -- 14:22

Q. It is not in the record yet. 14:22

A. The concept design. 14:22

Q. We are using it for the first time 14:22

now. 14:22

A. Which one now -- 14:22

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Q. Let her finish marking it. 14:22
MS. NGUYEN: And the petitioner 14:22
would like to object to Exhibit 41 with 14:22
respect to its authenticity and public 14:22
availability. It is a new exhibit that 14:22
petitioner and Dr. Beigi have not seen 14:22
before and we have not had a chance to 14:22
analyze. 14:22
Q. Let's start with Exhibit 42. That's 14:22
Exhibit 2008 from the IPRs. 14:22
Do you recognize Exhibit 42? 14:22
A. I do. 14:23
Q. And that is what you thought was 14:23
authoritative, at least in part from IBM, with 14:23
respect to a particular definition of what is a 14:23
chatbot? 14:23
MS. NGUYEN: Objection, form. 14:23
A. The chatbot definition that was on 14:23
the second -- top of the second page is the 14:23
definition I was referring to. 14:23
Q. Okay. And you see -- did you look 14:23
it up on the internet? 14:23
MS. NGUYEN: Objection, form. 14:23
Q. The original of 2008? Did you go to 14:23

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the URL and look? 14:23

A. No, I just took the -- took a paper 14:23

copy, a PDF copy. 14:23

Q. But you didn't double-check to make 14:23

sure that you felt comfortable with it? 14:23

A. In what sense comfortable, with the 14:23

content? 14:23

Q. Yeah -- 14:23

A. I'm assuming that there is no 14:23

deceit; that the content is what is on the 14:23

website. 14:23

So because it says -- if somebody 14:23

gave me this and is telling me this is from the 14:23

Wayback Machine, which basically means it is not 14:24

available anymore, by the way, and that it is a 14:24

snapshot from the date that it provides, which 14:24

is from 27th of December of 2022, right, so this 14:24

is a two-year-old article, archived on the 14:24

Wayback Machine and this is what has been 14:24

represented as the truth and I take it on face 14:24

value. 14:24

Q. Well, you know that the petitioners 14:24

put in a declaration which you relied on from 14:24

the people that run the Wayback Machine to say 14:24

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that documents from the Wayback Machine are 14:24
authenticated as of the date that they are 14:24
indicated, right? 14:24
A. I know they are authentic. I am not 14:24
saying they are -- 14:24
MS. NGUYEN: Objection, form. 14:24
A. -- I'm saying you asked me whether I 14:24
went to the link myself. 14:24
Q. The Wayback link? 14:24
A. The Wayback link, and I'm saying 14:25
this is a printout of the Wayback link, and I 14:25
have no reason to believe that this is not 14:25
authentic. I don't have any reason to believe 14:25
that's not authentic. 14:25
Q. And the definition that you like is 14:25
the one that referred to National Language 14:25
Processing right? 14:25
A. No, the chatbot. Not the Natural-- 14:25
Q. Right. "The chatbot is a computer 14:25
program that uses artificial intelligence and 14:25
natural language processing to understand 14:25
customer questions and automate them to simulate 14:25
human conversation." 14:25
Is that the definition you are 14:25

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talking about? 14:25

A. That's the definition. But it's not 14:25
a definition of natural language processing. 14:25
It's a definition of a chatbot and not a 14:25
definition of natural language processing. 14:25

MS. NGUYEN: Objection. 14:25

Q. And if you look at 41, I'll 14:25
represent to you that this is what you get when 14:25
you click on natural language processing. 14:25

MS. NGUYEN: That objection, form. 14:26

A. On the link, natural language 14:26
processing. You are saying if I clicked on 14:26
that, I would get document 41? 14:26

Q. That's my understanding, yes. 14:26

So I want you to look at the 14:26
explanation of natural language processing in 14:26
Exhibit 41 and let me know whether you agree or 14:26
disagree. 14:26

And I'm going to start at the top of 14:26
page 2 where it says, "Natural language 14:26
processing strives to build machines that 14:26
understand and respond to text and/or voice data 14:26
and respond with text and/or speech of their own 14:26
in much the same way humans do." 14:26

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Do you agree that's a fair 14:26
characterization of natural language processing? 14:26
MS. NGUYEN: Objection, form. 14:26
A. It's not a definition. It just says 14:26
that it strives to build machines. Natural 14:27
language processing -- this is a motivation. 14:27
Q. But it's not just to build machines, 14:27
it's to build machines that understand and 14:27
respond. 14:27
A. I understand that. What I am saying 14:27
is it's not a definition. 14:27
Q. I didn't say it was a definition. 14:27
I'm asking do you agree with the 14:27
characterization. 14:27
A. I'm trying to -- characterization? 14:27
Whether it strives to build machines? 14:27
Q. And I'm focusing on that 14:27
"understanding and respond to voice and text 14:27
data"? 14:27
A. Yeah, I mean, I don't know how 14:27
natural language processing, which is a thing, a 14:27
concept can strive to build machines. I think 14:27
people can strive to build machines. 14:27
But that's why I'm just like -- I'm 14:27

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reading this and I think it just doesn't make 14:27
sense in English when natural language 14:27
processing is -- because natural language 14:27
processing is a process. 14:27
Q. If it doesn't make sense, that's 14:27
fine, you can tell me that. 14:28
So now down below that where it 14:28
says, What is natural language processing?" 14:28
Do you see that? 14:28
A. Yes. 14:28
Q. And it says, "Natural language 14:28
processing, NLP, refers to the branch of 14:28
computer science and more specifically the 14:28
branch of artificial intelligence, or AI, 14:28
concerned with giving computers the ability to 14:28
understand text and spoken words in much the 14:28
same way as human beings can." 14:28
Do you agree with that statement? 14:28
MS. NGUYEN: Objection, form. 14:28
A. I don't. Because -- and let me 14:28
explain why. Because natural language 14:28
processing includes something called natural 14:28
language understanding, where natural language 14:28
understanding refers to the branch which is 14:28

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concerned with giving computers the ability to 14:28
understand the texts and spoken words. 14:28
So a branch of natural language -- 14:28
and this is a mistake that a lot of people may 14:29
make, but that is -- it's not true that natural 14:29
language processing as a whole has to have 14:29
understanding. Natural language processing is 14:29
the -- the meaning is right in the words. It's 14:29
processing natural language. 14:29
Natural language understanding is a 14:29
division, is a subset, is a section of natural 14:29
language processing which that is concerned 14:29
about understanding the text and spoken words. 14:29
Q. So I assume you don't agree with the 14:29
next paragraph at the top of page 3 where it 14:29
says, "NLP combines computational linguistics, 14:29
rule-based modeling of human language with a 14:29
statistical machine learning and deep learning 14:29
modules. Together these technologies enable 14:29
computers to process human language in the form 14:29
of text or voice data to 'understand' its full 14:29
meaning, complete with the speaker's or the 14:30
writer's intent and sentiment." 14:30
MS. NGUYEN: Objection, form. 14:30

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Q. Do you agree with that portion? 14:30
A. I have to read it -- this is the 14:30
first time I'm seeing it so I have to read it 14:30
and try to understand. 14:30
Q. I want you to take your time. 14:30
A. This is a very loaded paragraph. 14:30
So -- and hence, the definition sort of thing. 14:30
So "NLP combines computational 14:30
linguistics," a version of it does. "Rule-based 14:30
modeling of human language," that's another 14:30
version. With "statistical machine learning and 14:30
deep learning models." So it's talking about 14:30
different kinds of NLP. "Combines these" -- 14:30
which basically is saying that it includes all 14:30
of these different -- I think this is the way 14:30
what it's trying to say, that NLP includes 14:30
computational linguistics, rule-based modeling 14:31
of human language, with statistical machine 14:31
learning and deep learning module. 14:31
Q. Do you understand that it's 14:31
requiring two components; one the computational 14:31
linguistics, and the other either statistical 14:31
machine learning or deep learning models? 14:31
MS. NGUYEN: Objection, form. 14:31

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A. No, it says "combines them." 14:31
Q. Which means you need both. 14:31
A. No, it is not required. This is not 14:31
patent. This is science. This is my field now. 14:31
It doesn't mean -- when it says "NLP 14:31
combines," that means it utilizes these 14:31
different things at its disposal to be able to 14:31
achieve it's goals. 14:31
So it says "NLP combines 14:31
computational linguistics, rule-based modeling 14:31
of human language with statistical," okay, so 14:31
now you've got computational linguistics, you've 14:31
got rule-based modeling of human language with 14:31
statistical machine learning basically and 14:31
machine learning and deep learning models." 14:31
It combines them which means that it 14:32
utilizes all of them. It has all of these at 14:32
its disposal. Then it continues. 14:32
Let me continue to see if I can 14:32
understand what they are trying to say. 14:32
Q. Keep going through and parsing what 14:32
you agree or disagree with. 14:32
A. "Together, these technologies," like 14:32
I said, these are the different technologies 14:32

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examples of the different technologies used by 14:32
NLP, "enable computers to process human 14:32
language," natural language processing, "in the 14:32
form of text or voice data," text is one form of 14:32
natural language process -- language and voice, 14:32
it could also come in voice form, "and to 14:32
understand its full meaning." 14:32
Again, now it's narrowing its scope 14:32
to NLU. When you understand it's full meaning 14:32
that's NLU which is a division of NLP. 14:32
"complete with the speaker or writer intent and 14:32
sentiment." 14:33
And if you notice, two of those 14:33
papers that I told you or one of the papers was 14:33
about emotion detection. 14:33
So complete -- this again is one 14:33
other aspect, yet another aspect, speaker or 14:33
writer intent and sentiment. 14:33
It is telling you what NLP can do 14:33
and with what utility it can do it. 14:33
It doesn't limit it. It doesn't 14:33
define it. It just says NLP takes all these 14:33
tools at its disposal to allow it to be able to, 14:33
if needed -- because NLP is a bigger picture, 14:33

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it's like a bigger umbrella, where NLU is part 14:33
of. To allow it to be able to understand the 14:33
full meaning including possibly the speaker, the 14:33
writer's intent or the sentiment. 14:34
Q. And not what NLP can do, but is it 14:34
your understanding that NLP is required to 14:34
process human language? 14:34
MS. NGUYEN: Objection, form. 14:34
A. Natural language processing, it has 14:34
to process natural language which we agreed 14:34
human language is natural language. 14:34
Q. And does it also have to understand 14:34
the full meaning of the human language it is 14:34
processing? 14:34
MS. NGUYEN: Objection, form. 14:34
A. NLP doesn't. NLU does. NLU, which 14:34
is a division of NLP does. Therefore, NLP 14:34
possibly can. So -- yeah. 14:34
Q. I understand -- 14:34
MS. NGUYEN: Please let him finish. 14:34
Q. I understand you are drawing a 14:34
distinction. I don't want to make them miss 14:34
their plane. So I'm just going to object. 14:34
MS. NGUYEN: We also would like the 14:34

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witness to answer and finish. 14:34

Q. So I'm asking you about NLP not NLU. 14:34

Okay. 14:35

And so what I want to understand is 14:35

whether NLP, in contrast to a subdivision of NLP 14:35

like NLU, requires the computer to understand 14:35

the full meaning of the human language it is 14:35

processing. 14:35

I think that your testimony is no -- 14:35

A. No. 14:35

Q. Because that's only NLU, not NLP? 14:35

A. That's correct. 14:35

MS. NGUYEN: Objection, form. 14:35

A. Well, NLU being part of NLP. So in 14:35

that sense -- 14:35

Q. Not NLP in total, just a subset? 14:35

A. NLP can, but it doesn't have to. 14:35

MS. NGUYEN: Dr. Beigi, please give 14:35

me a chance to raise objections. Thank 14:35

you. 14:35

THE WITNESS: Okay. 14:35

Q. And with respect to complete, 14:35

"complete with the speaker and writer's intent 14:35

and sentiment," is it your testimony that while 14:35

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NLU will require complete with the writer -- 14:35
speaker or writer's intent and sentiment, NLP 14:35
does not require that? 14:35
MS. NGUYEN: Objection, form. 14:35
Q. As part of the understanding? 14:35
A. Another division of NLP is sentiment 14:36
analysis. And like NLU being natural language 14:36
understanding, another division, which has 14:36
research groups working on, is sentiment. 14:36
And this sentiment part for example 14:36
they are talking about, is still NLP is the 14:36
umbrella. It doesn't require it. It doesn't 14:36
require any one of these. It can do these 14:36
because it is NLP as a whole. 14:36
Q. Okay, we will take a five-minute 14:36
break? 14:36
A. Sure. 14:36
(Recess) 14:36
Q. Dr. Beigi, I'm showing you what we 14:50
previously marked as Beigi Exhibit 19 which is 14:50
the Khoros article. 14:50
And in that article, as you will 14:50
recall, it talks about different types of 14:50
chatbots, rule-based bots and NLP of AI bots, 14:50

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right? 14:50

A. I remember the article that you 14:50
presented last time at my deposition. 14:50

MS. NGUYEN: Objection, form. 14:50

Q. And you didn't agree that a person 14:50
of ordinary skill in the art would understand 14:50
that chatbots were divided between rule-based 14:51
chatbots and NLP chatbots, correct? 14:51

MS. NGUYEN: Objection, form. 14:51

A. This divisioning of rule-based 14:51
versus NLP doesn't make sense. Because NLP can 14:51
have, let's say, rule-based or many other kinds. 14:51

But there are two parts and that's 14:51
why I was referring to the other definition. 14:51
The definition requires an AI and also requires 14:51
NLP. It requires NLP. That's an "and." It 14:51
really requires both of those. 14:51

And because it requires both, then 14:51
you can't have just rule-based chatbots with no 14:51
NLP because it does specifically says since no 14:51
art -- and it also says, "Since no artificial 14:51
intelligence is used here," yet it calls it 14:51
rule-based, whereas rule-based, for decades, 14:51
artificial intelligence was defined as 14:51

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rule-based. For decades. 14:52

So to say something is rule-based 14:52

and say no artificial intelligence is used, this 14:52

is -- that's why I said I don't like this 14:52

article at all and I don't really think it's 14:52

valid. 14:52

Q. And I'm not trying to challenge 14:52

whether you like or dislike. I just want to 14:52

confirm that you didn't like it which is what I 14:52

think you just told me. 14:52

A. I confirmed I did not like it. 14:52

Q. Right. and you also did not like the 14:52

definition in IBM with respect to NLP because 14:52

you think it confuses NLP versus NLU? 14:52

MS. NGUYEN: Objection, form. 14:52

A. In IBM, you mean Exhibit 41? 14:52

Q. Exhibit 41, yes. 14:52

A. And which one? We looked at 14:52

different things. One was we looked at the 14:52

preamble which said natural language processing 14:52

strives to build. And then there was one where 14:52

natural language is -- being defined which at 14:52

the bottom, it says, natural language processing 14:52

refers to the branch of computer science and, 14:52

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more specifically, the branch of artificial 14:53
intelligence concerned with giving computers the 14:53
ability to understand texts. And it is 14:53
narrowing it to narrowing text which is not the 14:53
only thing natural language processing does. 14:53
So in my opinion, this definition is 14:53
not the proper definition for natural language 14:53
processing as a whole. But more a natural 14:53
language understanding. 14:53
Q. I remember in your prior deposition 14:53
you didn't even want to get into the definition 14:53
of AI because lots of people had bad 14:53
definitions, right? 14:53
MS. NGUYEN: Objection, form. 14:53
A. We can specifically look at that. I 14:53
recall some arguments about that. 14:53
Q. Right. In general, do you think 14:53
it's a fair proposition that a POSITA, which is 14:53
as you defined it someone with two years of work 14:53
experience in NLP or chatbots, would not have 14:53
the same level of skill and understanding in the 14:53
use of language about chatbots or NLP as you do? 14:54
MS. NGUYEN: Objection, form. 14:54
A. You're asking me whether a POSITA 14:54

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with three years of experience -- can you 14:54
connect it to what we are discussing here? 14:54
Because that's a very -- yeah. 14:54
Q. So the POSITA doesn't have your 14:54
level of experience in NLP or chatbots, right? 14:54
MS. NGUYEN: Objection, form. 14:54
A. Okay, let's assume that, yes. 14:54
Q. And IBM has lots of people who are 14:54
certainly experts on both of those subjects 14:54
right? 14:54
A. I used to work there for ten years, 14:54
yes. 14:54
Q. And even IBM gives a sloppy 14:54
definition of what an NLP is as you explained 14:54
it? 14:54
A. Okay, so IBM -- 14:54
MS. NGUYEN: Objection, form. 14:55
A. IBM is not giving this definition. 14:55
First of all, who wrote this article? 14:55
Q. IBM. 14:55
A. No, I mean, I know, but who wrote 14:55
it? 14:55
Q. IBM's website. 14:55
A. IBM doesn't have a pen and can't 14:55

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type. IBM has people. 14:55

Q. Well, IBM has a website that has a 14:55
topic section and underneath that topic section, 14:55
it has chatbots and it also has another topic 14:55
section which is natural language processing. 14:55

So I do attribute it to IBM as a 14:55
whole. 14:55

A. I understand. 14:55

So what I'm saying is that a person 14:55
wrote this and it happens all the time that a 14:55
sloppy definition -- because definition -- you 14:55
need to be very careful with definitions because 14:55
of exactly misuses such as this. 14:55

When you have a definition, it has 14:55
to encompass -- it has to reflect exactly the 14:55
same thing as it's defining. A POSITA, who I 14:55
define, who would have one to two years -- I'm 14:55
paraphrasing because I -- I remember something 14:56
like that, one to two years after a bachelor's 14:56
degree in a related field in -- so the 14:56
experiences in NLP or chatbots, if somebody has 14:56
a bachelor's degree and has experience in NLP, 14:56
even if they write a definition like this, but 14:56
when they actually see something where they're 14:56

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doing natural language processing themselves and 14:56
they know of it as natural language processing, 14:56
yet it doesn't understand or doesn't aspire to 14:56
understand the text and they -- many people do 14:56
it if you're in the field, in that case, they 14:56
will understand -- still understand it. They 14:56
may not be a good writer. They may not be able 14:56
to write it properly. Somebody who writes a 14:56
definition doesn't just need to understand it. 14:57
It needs to also understand how to convey 14:57
information. 14:57

There are many people who are good 14:57
people, work at IBM, and understand it, and they 14:57
may not be good in conveying the information. 14:57
There are mistakes that are made. 14:57

So I am -- I'm just looking at this, 14:57
not at the IBM part of it. I'm looking at it as 14:57
a definition and I see the whole and a POSITA 14:57
who would understand natural language, but who 14:57
listened in class, who did the practice 14:57
properly -- which is what I'm asking for, I'm 14:57
not asking for somebody who is not a POSITA -- 14:57
would understand that natural language 14:57
processing is processing of natural language, 14:57

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not necessarily understanding it. Understanding 14:57
falls under one branch of natural language 14:57
processing. 14:57
Q. Have you seen sloppy use of the 14:57
words "NLP" or "chatbots" on Medium? 14:57
MS. NGUYEN: Objection, form. 14:58
A. That's such a general question, I 14:58
don't know whether I've used -- I've seen it or 14:58
not. 14:58
Q. Have you ever seen the sloppy use of 14:58
the word "chatbots" beyond whatever is in the 14:58
record right now on the internet? 14:58
MS. NGUYEN: Objection, form. 14:58
Outside the scope of his testimony. 14:58
A. I don't know. I don't know. I'm 14:58
not sure. 14:58
Q. Have you ever seen sloppy use of 14:58
"NLP" other than in Exhibit 41? 14:58
MS. NGUYEN: Objection, form, 14:58
outside of the scope of his testimony. 14:58
A. Natural language processing 14:58
meaning -- see, the thing is if somebody means 14:58
natural language understanding, and they call it 14:58
NLP, they're not wrong because it's a branch of 14:58

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natural language processing. So that's the kind of thing you see. 14:58

However, to define something -- not many people defining natural language processing. There aren't not that many definitions. Definitions, when you talk to people and work with people, they are not defining things left and right. They are using it. 14:59

When they use it, they understand what they are using. They understand whether they are using "understanding" or they just merely meaning "processing" which could include understanding. They will understand it, because they're the ones actually coding it. They are the ones understand the algorithms. 14:59

It's very hard for you not to know that you are doing natural language processing because the first thing you start with when you learn natural language processing in school is not the understanding part. That's a very complicate problem. 14:59

It's the regular processing part. When you start learning some of those things, 14:59

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knowing that you are learning natural language 14:59
processing, you move on and one branch that you 14:59
will probably learn is understanding which is 14:59
part of it. 14:59
So in that sense, I'm not sure, you 14:59
know, in this context, I don't know that many 15:00
people that go around defining natural language 15:00
processing where I have to say that they're 15:00
confused. 15:00
Q. Do they use "natural language 15:00
processing" when they really mean "natural 15:00
language understanding"? 15:00
MS. NGUYEN: Objection, form. 15:00
A. But that-- 15:00
Q. That's the question. 15:00
A. That's not a problem because 15:00
"natural language understanding" includes -- 15:00
"natural language processing" includes "natural 15:00
language understanding." But the vice versa is 15:00
not true. 15:00
Any natural language understanding 15:00
is not -- does not include all of natural 15:00
language processing. All of natural language 15:00
processing is the super set. The subset is 15:00

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natural language understanding. It is a very 15:00
simple thing. 15:00
So if you conflate it, you can say 15:00
"natural language processing" when you really 15:00
mean "natural language understanding," but you 15:00
have to back it up by the fact that the thing 15:00
understands, right. 15:00
So if you actually use the word 15:01
"natural language processing," you are talking 15:01
about the whole thing. That means any 15:01
processing that you do in natural language is 15:01
natural language processing. 15:01
Q. Is it fair to say that many people 15:01
out there on the internet confuse natural 15:01
language processing with natural language 15:01
understanding? 15:01
MS. NGUYEN: Objection, form. 15:01
Outside of the scope of his testimony. 15:01
A. I can't say that any more than you 15:01
can say many people on the internet confuse two 15:01
other words. Two other phrases. 15:01
It's a very -- you are asking my 15:01
opinion on what the internet reflects. Internet 15:01
is huge, has every kind of person and every kind 15:01

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of person comes with every kind of flavors. So 15:01
that's -- I think you're asking me to make a 15:01
decision that is not in my power. 15:01
MR. MACEDO: Dr. Beigi, thank you 15:01
very much. I appreciate your time and we 15:02
will pass the witness on to the 15:02
petitioner, subject to our review of your 15:02
errata sheet and in case we have any 15:02
questions that may arise as a result of 15:02
those changes. 15:02
THE WITNESS: Thank you. 15:02
(Recess) 15:02
MS. NGUYEN: Ready, Dr. Beigi? 15:41
THE WITNESS: Yes. 15:41
MS. NGUYEN: We do not have any 15:42
questions for Dr. Beigi. We consider this 15:42
deposition closed. 15:42
Walkme's counsel said that he had 15:42
passed the witness subject to review of 15:42
the errata sheet for Dr. Beigi's June 15:42
deposition. However, there is no such 15:42
requirement at the PTAB, so this concludes 15:42
the deposition. 15:42
Thank you. 15:42

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MR. MACEDO: We reserve our rights. 15:42

And thank you, Dr. Beigi, for your 15:42

time and we appreciate it. 15:42

THE WITNESS: Thank you. 15:42

(Time noted: 3:42 p.m.) 15:42

_____
HOMAYOON BEIGI

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

_____

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2 INDEX:

3 WITNESS EXAM BY: PAGE:
4 H. Beigi Mr. Macedo 287

5

6 EXHIBIT INDEX:

7 NUMBER DESCRIPTION PAGE:
8 Exhibit 40 Errata Sheet 295
9 Exhibit 38 Expert Declaration of Ivan 296
10 Zatkovich in Support of Patent
11 Owner Response for Interparty
12 Review of claims 1 through 6,
13 9 through 16, 18 through 21 of
14 U.S. Patent 11,258,732 from
15 IPR 2023-01379
16 Exhibit 39 Expert Declaration of Ivan 297
17 Zatkovich in Support of Patent
18 Owner's Response for the
19 Interparty Review of Claims 1
20 through 9, 12 through 16, 18
21 through 23, 25 through 26, 28
22 through 31, 33 of U.S. Patent
23 Number 10,819,664B2, and it is
24 from IPR 2023-0368, patent
25 number 10,819,664B2

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2 EXHIBIT INDEX:

NUMBER	DESCRIPTION	PAGE:
Exhibit 40	document entitled "Natural Language Processing"	391
Exhibit 41	document entitled, "Natural Language Processing"	453
Exhibit 42	document entitled, "What is a Chatbot?"	454

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CERTIFICATE

STATE OF NEW JERSEY)
)ss:
COUNTY OF UNION)

I, MARY F. BOWMAN, a Registered Professional Reporter, Certified Realtime Reporter, and Notary Public within and for the State of New Jersey, do hereby certify:

That HOMAYOON BEIGI, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.

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

In witness whereof, I have hereunto set my hand this 14th day of November, 2024.

MARY F. BOWMAN, RPR, CRR

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2 * * *ERRATA SHEET* * *

3 NAME OF CASE: Walkme v. Whatfix

4 DATE OF DEPOSITION: 11.12.24

5 NAME OF WITNESS: HOMAYOON BEIGI

6 Reason codes:

7 1. To clarify the record.
2. To conform to the facts.
8 3. To correct transcription errors.

9 Page ____ Line ____ Reason____
From _____ to_____
10

11 Page ____ Line ____ Reason____
From _____ to_____
12

13 Page ____ Line ____ Reason____
From _____ to_____
14

15 Page ____ Line ____ Reason____
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17 Page ____ Line ____ Reason____
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19 Page ____ Line ____ Reason____
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21 Page ____ Line ____ Reason____
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24 _____
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293:3

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432:5

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