

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD
4

5 SAMSUNG ELECTRONICS CO., LTD. and
6 SAMSUNG ELECTRONICS AMERICA, INC.,

7 Petitioners,

8 v.

9 FENDGO, LLC,

10 Patent Owner.

11
12 Case IPR2024-00113
13 Patent No. 11,265,404
14

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16
17 DEPOSITION OF GEORGE EDWARDS, Ph.D.

18 DATE: OCTOBER 30, 2024
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25 REPORTED BY: CHARLENE FRIEDMAN, CCR, RPR, CRR

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TRANSCRIPT of the deposition of the
GEORGE EDWARDS, Ph.D., called for Oral Examination in the
above-captioned matter, said deposition being taken by
and before CHARLENE FRIEDMAN, a Notary Public and
Certified Court Reporter, a Registered Professional
Reporter, and a Certified Realtime Reporter, via video
teleconference, by Zoom, on October 30, 2024, commencing
at approximately 12:00 in the afternoon, Eastern Time.

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

2

3 ARNOLD & PORTER KAYE SCHOLER, LLP
4 601 Massachusetts Avenue, NW
5 Washington, DC 20001
6 (202) 942-5000
7 BY: PATRICK REIDY, ESQ.
8 Attorneys for Petitioners

7

8 STEPTOE, LLP
9 227 W. Monroe Street
10 UNIT 4700
11 Chicago, Illinois 60606
12 (312) 577-1300
13 BY: SADAF MISBAH, ESQ.
14 Attorneys for Patent Owner

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1 I N D E X

2 WITNESS NAME PAGE

3 GEORGE EDWARDS, Ph. D.

4 By Mr. Reidy 7

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10 E X H I B I T S

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12 EXHIBIT NO. DESCRIPTION PAGE

13 EXHIBIT 1007 Walker reference 40

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Deposition Support Index

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Direction to witness not to answer

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None

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Request for production of documents

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Questions marked

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None

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1 CERTIFIED SHORTHAND REPORTER: My
2 name is Charlene Friedman, a Certified
3 Shorthand Reporter and Notary Public of
4 the State of New Jersey. This
5 deposition is being held via video
6 teleconference equipment.

7 The witness and reporter are not in
8 the same room. The witness will be
9 sworn in remotely, pursuant to agreement
10 of all parties. The parties stipulate
11 that the testimony is being given as if
12 the witness was sworn in person.

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1 G E O R G E E D W A R D S, P H. D.,
2 called as a witness, having been first duly
3 sworn according to law, testifies as follows:
4

5 MR. REIDY: My name is Patrick
6 Reidy.

7 I'm an attorney at Arnold & Porter,
8 and I represent the petitioners here,
9 Samsung Electronics Company Limited and
10 Samsung Electronics America, Inc.

11 MS. MISBAH: My name is Sadaf
12 Misbah.

13 I represent the patent owner in
14 this case, Fendgo, LLC.

15 EXAMINATION BY MR. REIDY:

16 Q All right. Dr. Edwards, can you
17 please just state your full name, for the
18 record?

19 A Sure.

20 My name is George Thomas Edwards.

21 Q Dr. Edwards, where are you sitting
22 today?

23 A I'm in my office in downtown Los
24 Angeles.

25 Q Is anybody else in your office with

1 you today?

2 A No.

3 Q Do you have any papers in front of
4 you?

5 A No.

6 Q Do you have your cell phone on you?

7 A I -- it's not on me, currently. I
8 put it away before we started.

9 Q Have you ever had your deposition
10 taken before?

11 A Yes.

12 Q About how many times?

13 A I would say about fifteen times.

14 Q All right. So as you know, we have
15 a court reporter here to take down my
16 questions and your answers.

17 We'll try our best not to talk over
18 each other, and please remember to verbalize
19 your answers, yes or no, versus head nods or
20 head shakes, okay?

21 A Okay.

22 Q Is there any reason why you are or
23 would be unable to provide truthful and
24 accurate testimony today?

25 A No.

1 Q Did you do anything to prepare for
2 today's deposition?

3 A Yes, I did.

4 Q What did you do?

5 A I reviewed my declaration and the
6 other materials cited in that declaration,
7 including the patents that are discussed in
8 that declaration.

9 And I also met with counsel for the
10 patent owner on Monday.

11 Q How much time did you spend
12 reviewing your declaration and the other
13 materials cited in your declaration?

14 A Specifically, for -- as preparation
15 for the deposition or in general?

16 Q So in the context of preparing for
17 today's deposition, how much time did you
18 spend reviewing your declaration and the
19 other materials cited in your declaration?

20 A Several hours. Maybe -- it might
21 have been as much as six or eight hours in
22 total between all the documents.

23 Q You understand that you have
24 submitted declarations in two separate IPR
25 proceedings, correct?

1 A Yes.

2 Q If I refer to the first IPR
3 proceeding as the 113 IPR and the second IPR
4 proceeding as the 114 IPR, will you
5 understand what I'm referring to?

6 A Yes, although sometimes I forget
7 which one is which. So if you're referring
8 to it just by the number, the additional
9 context is helpful.

10 Q So was the six or eight hours that
11 you spent reviewing your declaration and
12 materials cited in there inclusive of the
13 time spent reviewing both of the declarations
14 and the materials were cited respectively in
15 those declarations?

16 A Yes.

17 Q You mentioned that you met with
18 counsel on Monday.

19 Is that right?

20 A Yes.

21 Q How long was that meeting on
22 Monday?

23 A One hour.

24 Q Okay. And was that Monday, October
25 28th?

1 A That's correct, yes.

2 Q All right. And who were the
3 attorneys that you met with during the
4 meeting on October 28th?

5 A Your question is who were the
6 attorneys?

7 Q Right.

8 A It was Ms. Misbah.

9 Q Was anybody else present during
10 your meeting on October 28th?

11 A No.

12 Q Did you talk to anybody else, other
13 than Ms. Misbah, in preparation for today's
14 deposition?

15 A I also talked briefly with two
16 members of my staff who assisted me with the
17 report preparation.

18 Q What are the names of the two
19 members of your staff?

20 A Luis Padilla and Josh Mathew.

21 Q Would you mind spelling their
22 names, please?

23 A Sure.

24 The first one is Luis Padilla.

25 It's spelled L-U-I-S, P-A-D-I-L-L-A.

1 The second person is Josh Mathew,
2 J-O-S-H, M-A-T-H-E-W.

3 Q How did Luis Padilla assist you
4 with your report preparation?

5 A In the way that I typically get
6 assistance from other experts on my staff as
7 part of these kinds of engagements. So they
8 would also review the patents at issue. I
9 would discuss those with them, provide them
10 with instruction in terms of how I would like
11 to prepare my report.

12 They help with some -- with some
13 aspects of putting together the report by
14 preparing the material and helping to draft
15 some of the content at my instruction.

16 Q How did Josh Mathew assist you in
17 preparing your report?

18 A Well, in the ways that I just
19 described, he would do those things.

20 And he may have done some other
21 things as well, like helping to track down
22 certain citations within the patent
23 specification or things like that.

24 Q Do Luis Padilla and Josh Mathew
25 report to you?

1 A Not directly, but indirectly they
2 do.

3 Q Do I understand correctly that your
4 current employer is an entity named Quandry
5 Peaks Research?

6 A Quandry Peak Research.

7 Q Quandry Peak Research, thank you.

8 Are Luis Padilla and Josh Mathew
9 are also employed by Quandry Peak Research?

10 A Yes.

11 Q What did you talk about with Luis
12 Padilla in preparation for your deposition
13 today?

14 A I think that we just discussed the
15 primary opinions in my declarations just to
16 refresh my memory so that it would be fresh
17 in my memory for the deposition.

18 Q When did you speak with Luis
19 Padilla in preparation for your deposition
20 today?

21 A I believe that was last week,
22 possibly Tuesday or Wednesday of last week.

23 Q About how long did you speak with
24 Luis Padilla in preparation for your
25 deposition today?

1 A I would say about 30 minutes to an
2 hour.

3 Q And when did you speak with Josh
4 Mathew in preparation for your deposition
5 today?

6 A That was at the same time.

7 Q But do I understand you correctly
8 that on Tuesday or Wednesday of last week,
9 you had a meeting with Luis Padilla and Josh
10 Mathew that lasted about 30 minutes to an
11 hour for the purpose of refreshing your
12 memory as to the contents of your
13 declarations in these IPR proceedings?

14 A I -- I think that's generally
15 accurate, yes.

16 That -- I can't say that was
17 necessarily the -- the entire purpose of the
18 meeting, but that was certainly the primary
19 purpose.

20 Q Was there another purpose for the
21 meeting?

22 A Well, the purpose of the meeting
23 was to help me prepare for this deposition.
24 So, you know, I may have discussed the
25 patents generally, may have looked at

1 particular citations to those patents that
2 were pertinent to my declaration, things of
3 that nature.

4 Q Was anybody else present during
5 this meeting that you had with Luis Padilla
6 and Josh Mathew?

7 A No.

8 Q And did you take any notes during
9 this meeting with Luis Padilla and Josh
10 Mathew?

11 A No.

12 Q Did Luis Padilla or Josh Mathew
13 provide you with any notes in preparation for
14 your deposition today?

15 A No.

16 Q Just a moment.

17 (Brief pause in proceedings.)

18 Q Okay. Other than Ms. Misbah, Luis
19 Padilla and Josh Mathew, did you speak to
20 anybody else in preparation for your
21 deposition today?

22 A No.

23 Q Do you recall any particular
24 aspects of your declarations that you
25 discussed with Luis Padilla and Josh Mathew?

1 A Nothing specific comes to mind.

2 Q Do you recall anything that you
3 discussed with Luis Padilla and Josh Mathew?

4 A Well, as I said, what I recall is
5 reviewing my declarations and going over the
6 opinions given in those declarations, going
7 over the various patents that are asserted as
8 prior art, and that was basically the content
9 of the discussion.

10 Q Did you personally write the
11 declaration which was submitted in the 113
12 IPR proceedings?

13 A Yes, I did, although as I said,
14 there were certain parts of it that were --
15 where those two staff members assisted me by
16 drafting content at my instruction based on
17 the opinions that I wanted to include. I
18 would give them an instruction as to what my
19 opinions are and how I want to organize the
20 report and so on.

21 They would assist me in drafting
22 some of the content, which I would then
23 review, make sure that it reflects my
24 opinions, and edit it, as necessary. So
25 that's the -- that's the process that I use.

1 Q Would you give the same answer with
2 regard to the declaration you submitted in
3 the 114 IPR proceedings?

4 A Yes.

5 Q Okay. How much time did you
6 personally spend on the declaration that you
7 submitted in connection with the 113 IPR
8 proceedings?

9 A I don't know. I don't know that
10 number, off the top of my head.

11 Q Are you able to provide an
12 estimate?

13 A I think I can give you a ballpark.

14 Q I would accept a ballpark.

15 A Okay. I would say I think I spent
16 maybe something around 40 hours in total.
17 And I don't know exactly how that breaks down
18 between the two declarations.

19 Q Do you recall when you were first
20 retained to work on these IPRs?

21 A I believe that it was in June or
22 July, somewhere around there, early summer of
23 2024.

24 Q Do you have a ballpark estimate of
25 how much time you spent on these IPRs since

1 you've been retained?

2 A Well, I believe that's what I
3 just -- the question that I just answered for
4 you.

5 Q Okay.

6 A Well, no. Since I've been
7 retained, I guess the entirety of it,
8 maybe -- maybe 60 hours or so.

9 Q Okay. How are you being
10 compensated?

11 A Well, my employer, Quandry Peak
12 Research, is paid on an hourly basis for the
13 time that I spend working on this matter.

14 Q How much is Quandry Peak Research
15 being paid on an hourly basis for your work
16 on this matter?

17 A I don't recall the exact number. I
18 would need to refer back to my engagement
19 agreement, which I don't have in front of me.

20 Again, I know roughly -- roughly
21 what it is. I think -- I believe it's -- you
22 know, it's within the normal range of my
23 typical rates.

24 Q And can you give me that normal
25 range?

1 A I think it's between \$550 to \$650
2 an hour is what Quandry Peak is paid for my
3 work on this case.

4 Q Is -- does Quandry Peak receive a
5 different hourly rate for the work that Luis
6 Padilla and Josh Mathew spend working on this
7 case?

8 A Yes.

9 Q Do you have an estimate of what the
10 hourly rate is for Josh Mathew and Luis
11 Padilla?

12 A Again, I could give you a ballpark.

13 Q What is the ballpark?

14 A I think it's about \$275.

15 Q What is the business of Quandry
16 Peak Research?

17 A The company provides technical
18 analysis and consulting primarily in the
19 areas of computers and software.

20 Q How much of your time at Quandry
21 Peak, as an estimate, is spent working on or
22 working as an expert consultant on
23 litigations?

24 A Of my -- my time specifically, I
25 would say it is about 25 percent to 50

1 percent, depending on -- you know, it
2 fluctuates a little bit month to month, but
3 it's usually in that range.

4 Q And other than working as an expert
5 consultant on litigations, what else do you
6 do personally for Quandry Peak Research?

7 A Well, many things.

8 I do things related to management
9 of the business.

10 I do things related to management
11 of the staff.

12 I do other kinds of consulting that
13 is not litigation.

14 Those would be some examples, but
15 it's a relatively small company. So as
16 the -- the president of the company, I often
17 have to wear many hats, so to speak.

18 Q Can you provide any examples of
19 other consulting that is not litigation that
20 you do?

21 A Sure.

22 Are you asking me personally or are
23 you asking about the company?

24 Q About you personally.

25 A Yeah.

1 So I assist with some intellectual
2 property analysis that's not in the context
3 of the litigation.

4 I also, on occasion, will assist
5 with consulting on what we call technical due
6 diligence of projects in which we're asked to
7 perform some kind of an assessment of a
8 software product or company, usually in the
9 context of some kind of an acquisition or
10 other corporate transaction like that.

11 I also provide advice and guidance
12 to the other experts on my staff, assist them
13 with their various activities. For example,
14 they might have authored a paper that they
15 want to submit to an academic journal and are
16 interested in my feedback on it, things like
17 that.

18 So those would be some other
19 examples of things that I spend my time
20 doing.

21 Q When was the first time you heard
22 of Fendgo?

23 A I believe it was when I was
24 contacted about this case.

25 Q And was that in June or July of

1 2024?

2 A As far as I recall, yes.

3 At least as I sit here today, I
4 don't recall having heard of Fendgo prior to
5 that.

6 Q Who first contacted in June or July
7 of 2024?

8 A I believe it was Ms. Misbah, if I
9 recall correctly.

10 Q Do you know who Samantha Diperna
11 is?

12 A I don't know her personally.

13 Q Do you know Samantha Diperna in
14 some other context?

15 A I recognize her name as one of the
16 inventors of the '404 patent.

17 Q Have you ever met Samantha Diperna?

18 A No.

19 Q Have you ever spoken to Samantha
20 Diperna?

21 A No.

22 Q What about Jacqueline Diperna?

23 A No.

24 Q Do you provide any valuation --
25 sorry, let me strike that.

1 Do you provide any patent valuation
2 services as part of your work for Quandry
3 Peak?

4 A Are you asking about me personally
5 or the company?

6 Q You personally.

7 A I can't recall an instance in which
8 I've ever done any patent valuation. That
9 doesn't sound like the kind of work that I
10 typically do certainly. And I -- at the
11 present time, I can't think of any instance
12 in which I did something that would fall into
13 that category.

14 Q Does anybody at Quandry Peak
15 Research provide patent valuation analysis or
16 services?

17 A Again, it's certainly not something
18 that we -- that's part of our typical work.
19 There are several dozen people at the -- the
20 company now, so I can't be aware of every --
21 every piece of work that's going on.

22 So I can't say necessarily that
23 someone hasn't done something related to
24 patent valuation at some point, but again, as
25 I sit here today, I can't think of a specific

1 instance in which I'm aware of someone
2 providing that kind of service.

3 Q Are you a founder or the founder of
4 Quandry Peak Research?

5 A I'm a founder.

6 Q And when did you start Quandry Peak
7 Research?

8 A 2012.

9 Q What was the business of Quandry
10 Peak Research when it was first started?

11 A Basically, the same as it is now;
12 initially focused on providing consulting and
13 technical analysis for software-related
14 litigation and providing expert witness
15 testimony on those topics.

16 And of course, we still do that
17 today, although over time, the company has
18 begun to provide some of the additional
19 services that I talked about a few minutes
20 ago.

21 Q Have you been an expert consultant
22 on any patent litigations before you founded
23 Quandry Peak?

24 A I think just one, if memory serves.

25 Q How did you first get into becoming

1 or being an expert consultant on patent
2 litigations?

3 A In -- some time in 2011, I received
4 a called or an e-mail, I forget which, from
5 my former adviser, Ph.D. advisor at the
6 University of Southern California, who said
7 that he had been contacted by an attorney who
8 needed someone to perform some course code
9 analysis on a patent case, and he was -- he
10 asked me if I would like for him to pass my
11 name along.

12 Q I'm going to share what I
13 understand to be your CV.

14 I'm going to put it in the chat.

15 A Okay.

16 (Brief pause in proceedings.)

17 Q Do you have the document that I
18 shared in the chat, Dr. Edwards?

19 A I see it there.

20 Would you like me to download it
21 and open it?

22 Q Please, yes.

23 A Okay.

24 Q Do you have it open?

25 A Yes.

1 And I'm just getting it arranged so
2 I'm able to see you on one side of the screen
3 while I have the document open on the other
4 side of the screen.

5 Q Okay.

6 (Brief pause in proceedings.)

7 A Okay. I've done that.

8 Q Okay. Can you take a minute to
9 look through this document and confirm that
10 it is an accurate copy of your current resume
11 or CV?

12 And if it's helpful, I'll represent
13 to you that I downloaded it from your bio
14 page, I believe, on the Quandry Peak Research
15 website.

16 (Witness reviewing.)

17 A It looks like it's my CV.

18 Q Okay. So do I understand correctly
19 that you received a BS in computer science
20 and a minor in mathematics from Vanderbilt in
21 August of 2003?

22 A Correct.

23 Q And if you turn to page 3 of your
24 CV, it looks like you held a role as a
25 graduate research assistant in the computer

1 science department of Vanderbilt University
2 from September 2003 to May 2024.

3 Do you see that?

4 A Yes.

5 Q One of the items of listed
6 experience under -- you know, in that role
7 is -- it says that you, "Developed a COBRA
8 (sic) component model framework that supports
9 application access to highly optimized and
10 scalable event-based publish-subscribe
11 communication services."

12 Can you help me better understand
13 what that work entailed?

14 A Sure.

15 And I guess, first, my correction
16 is that it's CORBA, C-O-R-B-A.

17 Q Oh, sorry.

18 A And that -- that is a -- that
19 stands for "common object request broker
20 architecture."

21 It was a standard developed by an
22 industry group called the Object Management
23 Group, or OMG, for creating distributed
24 applications in a way that would allow
25 programmers to create objects and components

1 that can communicate with each other over
2 computer networks while hiding much of the
3 low-level complexity and details about how
4 the messages are actually exchanged over the
5 network, which allows programmers to focus
6 more on the business logic of their
7 applications as opposed to spending lots of
8 time reinventing the wheel, so to speak,
9 writing code that handles the communication
10 over the network.

11 Q In the next bullet, it says,
12 "Created a specification language and
13 supporting toolset for configuring QoS
14 policies in component-based DRE systems."

15 What is a DRE system?

16 A DRE stands for "distributed,
17 realtime and embedded."

18 Q What does QoS stands for?

19 A "Quality of service."

20 Q So when you say that you developed
21 a CORBA component model framework, that's
22 different from actually developing the CORBA
23 standard.

24 Is that right?

25 A It is different, but of course,

1 very closely related.

2 Q Were you part of the industry group
3 that developed the CORBA standard?

4 A I was not on the committee that was
5 responsible for creating and revising the
6 standard documents themselves.

7 Q Okay. Can you help me better
8 understand the relationship, then, between
9 the CORBA component model framework and the
10 CORBA standard?

11 A Sure.

12 The CORBA component model or CCM --
13 and you're testing my memory a bit here
14 because we're going back, I think, 20 years
15 or so, but that was a -- an additional
16 standard that was, of course, building on top
17 of the earlier CORBA standards that added
18 increased capabilities for creating
19 components, component-based systems.

20 And as I recall, at that time,
21 those standards were still pretty
22 preliminary. The way that the
23 standardization process works in practice, at
24 least with respect to these standards -- and
25 I think this is true of at least some other

1 software standards -- that the -- the
2 standards are developed sort of iteratively.

3 The committee will come out with
4 different drafts. They will get feedback.
5 People will work on implementing those
6 standards and point out things they like and
7 things they don't like. People may implement
8 things that deviate from the standard in
9 various ways as experiments or as
10 demonstrations to show how the standard could
11 be improved if something were added or taken
12 away.

13 Different entities might push for
14 different things to be included in the
15 standard and not always agree on that. So
16 the creation of the standards is a -- is a
17 process that usually occurs over a number of
18 years.

19 So what I was doing specifically
20 with my work on these event-based
21 public-subscribed services was developing
22 some things that were based on those
23 preliminary standards and implemented the
24 preliminary standards, but also, added new
25 capabilities that I thought were valuable or

1 useful and could be incorporated into the
2 standard later.

3 And of course, since this was
4 academic work, as you said -- and this is
5 when I was a graduate research assistant at
6 Vanderbilt -- we would also publish papers
7 about the work we were doing and, you know,
8 explain how the systems that we were building
9 provided value or could provide value to
10 software developers and software engineers.

11 Q Okay. It looks like the next item
12 on your CV is the role of a software engineer
13 for the Boeing Company. That appears to have
14 started in June 2005.

15 Is that right?

16 A Yes, that's right.

17 Q What did you do between May of 2024
18 and June 2005?

19 A I moved from Vanderbilt to the
20 University of Southern California during the
21 summer of 2024. So I began full-time Ph.D.
22 studies at the University of Southern
23 California in August 2024.

24 Q Okay.

25 A So I was a full-time Ph.D. student

1 at -- and graduate fellow during the time
2 interval you asked about.

3 Q While you were a software engineer
4 at the Boeing Company, the second bullet
5 under that role says that you, "Developed the
6 architecture for a mobile handheld device for
7 controlling unmanned autonomous air and
8 ground robots."

9 Can you help me better understand
10 what you mean by the architecture for a
11 mobile handheld device?

12 A That's referring to the software
13 architecture for the software that would run
14 on that device.

15 Q So did you actually write the
16 source code for this mobile device?

17 A No, because this was occurring in
18 the context of a very large Department of
19 Defense project called the Future Combat
20 System or FCS Project. Boeing was the lead
21 systems integrator or essentially the prime
22 contractor for the department of defense on
23 that project.

24 So Boeing was not responsible for
25 actually writing the code, but among the many

1 things that Boeing did have responsibility
2 for was development of the architecture,
3 which is what I worked on.

4 Q Before January 2005, did you have
5 any experience writing or developing
6 applications for mobile phones?

7 A I don't know that I can recall
8 every project that I worked on back in those
9 days.

10 Prior to January of 2005, that
11 would have included my work as an
12 undergraduate, for example, and I may have
13 developed software for a mobile device as
14 part of a class project or something like
15 that.

16 Q Okay.

17 A The development work that I was
18 engaged in as a graduate research assistant
19 at Vanderbilt certainly was applicable to
20 mobile devices and was designed to provide
21 software development capabilities that would
22 be used to develop mobile device software.

23 So I think that the answer would be
24 yes, although the -- I would say many of the
25 things I worked on would be applicable to

1 mobile devices as well as other types of
2 computing devices.

3 Q So do you recall any specific
4 application that you worked on that -- that
5 has developed or designed before January 2005
6 that would have been applicable to mobile
7 devices?

8 A Well, again, you're testing my
9 memory here, but what I recall is that the --
10 the kinds of systems that we were working on
11 at Vanderbilt during that time period
12 included various kinds of demonstration
13 applications that we would create to sort of
14 show the capabilities we were working on, and
15 those would include a variety of different
16 kinds of devices, including mobile devices.

17 When I started my Ph.D. research
18 and Ph.D. studies at USC in August of 2004,
19 the group that -- the research group that I
20 joined there was very active in development
21 of middleware and application frameworks for
22 mobile devices. So during the fall of 2004,
23 I worked on a number of things as part of
24 that research group.

25 Of course, the mobile devices were

1 much more primitive in those days. So as I
2 recall, we were developing software for
3 things like the Palm Trio and maybe some
4 handheld Compaq PDAs and some mobile devices
5 like that.

6 Q What kind of software were you
7 writing for the Palm Trio and the PDAs?

8 For example, was it limited to
9 middleware or were you developing
10 applications?

11 A Certainly, the focus of our
12 research was on the middleware, but I think,
13 again, we would have developed applications
14 that allowed us to demonstrate the
15 capabilities we were working on with the
16 middleware.

17 So the development of applications
18 was sort of — it was part of the work,
19 although it was not the primary goal of the
20 work.

21 Q Do you know what particular type of
22 middleware that you were working on, that is,
23 middleware that performed particular
24 functions?

25 A Well, one of the things that we

1 worked on in that research group at that
2 time -- and are you asking about in the fall
3 of -- fall of 2004 at USC?

4 Q Sure.

5 A Okay. That was a JAVA-based
6 middleware platform called Prism-MW.

7 Q And what was the purpose or
8 function of Prism-MW?

9 A Well, like other middleware
10 platforms or application frameworks, the goal
11 was to provide capabilities for building
12 distributed applications such that software
13 developers and software engineers could reuse
14 the platform to create all different kinds of
15 applications and not have to rebuild those
16 capabilities every time they create a new
17 application.

18 And they can get many of the --
19 much of the functionality that they need off
20 the shelf or out of the box and build an
21 application on top of that.

22 In the example I gave earlier was
23 handling messaging or communication over a
24 computer network, which is something many
25 applications have to do, and certainly, any

1 distributed application has to do.

2 So by building a middleware
3 platform that has that capability built in, a
4 programmer can reuse that and not have to
5 reprogram that functionality every time he or
6 she creates a new software application.

7 With respect to Prism-MW, the focus
8 was on creating something that was very
9 lightweight, so to speak, meaning that it did
10 not utilize an extensive amount of computing
11 power or memory because it was intended to
12 run on mobile devices, which, of course, are
13 more resource constrained because they don't
14 have the same processing power, the same
15 amount of memory and storage that you would
16 have in a laptop or a desktop computer or
17 certainly a server. And they're resource
18 constrained in other ways. They have to rely
19 on battery and so forth.

20 So one of the purposes of Prism-MW
21 was to be sufficiently lightweight that it
22 would operate well on those resource
23 constrained mobile devices.

24 Q Did Prism-MW have the built-in
25 capability to handle messaging or

1 communication over a computer network?

2 A That was one of the things that it
3 provided, yes.

4 Q And were you responsible for
5 building that component of Prism-MW?

6 A I wasn't solely responsible. I was
7 working as a part of a team of graduate
8 students, post-docs, professors, et cetera,
9 part of the normal people that are part of a
10 university research lab.

11 Q Did you work on any aspect of that
12 component of Prism-MW?

13 A I believe I did, yes.

14 Q Can you elaborate any more on what
15 aspect of that component of Prism-MW you
16 worked on?

17 A I would -- I would need to go back
18 and reread some of my papers, I guess, during
19 that time to refresh my memory on
20 specifically what I was -- what I was working
21 on that fall.

22 Q All right. Was Prism-MW ever
23 commercialized?

24 A What do you mean by
25 "commercialized"?

1 Q Offered for sale?

2 A No, because it was an academic
3 research project.

4 The source code was made open
5 source and freely available to anyone who
6 wanted to use it, which is common for -- for
7 academic projects, especially those that
8 are -- that receive some government funding
9 of some kind that the research is made --
10 made available to the purpose for the benefit
11 of the public.

12 Q Did Prism-MW support the ability to
13 transmit image data in messages over a
14 computer network?

15 A Well, it could transmit whatever
16 kind of data an application would choose to
17 store in the messages that it would
18 distribute to the different components in the
19 system.

20 So I don't recall any specific
21 facilities for image data, but again, as a
22 middleware platform, it's sort of agnostic as
23 to what the kind of data is or what the
24 meaning or format of that data is.

25 And that's not the job of the

1 middleware platform. Its job is to make sure
2 the data gets where it's supposed to go and
3 the application then should understand what
4 to do with it and use it to create some kind
5 of a useful function or feature for the
6 ultimate human beings who are using the
7 system.

8 Q Okay.

9 THE WITNESS: We've been going
10 about an hour. So maybe if you reach a
11 good stopping point in the next few
12 minutes, we can take a break.

13 MR. REIDY: We can take a break
14 now, if you would like.

15 How long do you need?

16 THE WITNESS: Oh, just five
17 minutes.

18 MR. REIDY: Okay. Five minutes
19 then.

20 (Brief recess taken.)

21 Q Dr. Edwards, I have sent -- or I'm
22 sending Exhibit 1007, the Walker reference,
23 in the chat.

24 (Above-mentioned document marked
25 for Identification.)

1 Q Can you please download that and
2 open it up and let me know when you've done
3 that?

4 A Okay.

5 Q Do you have it open?

6 A Okay, yes.

7 I have it open.

8 Q Do you recognize Exhibit 1007?

9 (Witness reviewing.)

10 A Yes.

11 Q Okay. What do you recognize it to
12 be?

13 A This is one of the prior art
14 references that I analyzed in forming the
15 opinions given in my declaration.

16 Q And on the first page, do you see
17 in the lower right-hand corner a little box
18 stamped Samsung -- strike that.

19 In the lower right-hand corner, on
20 the first page of Exhibit 1007, do you see a
21 stamp labeled, "Samsung v. Fendgo,
22 IPR2024-00113, Exhibit 1007"?

23 A Yes, I see that.

24 Q And in the lower left-hand corner,
25 do you see where it says, "Exhibit 1007, page

1 1 of 56"?

2 A Yes, I see that.

3 Q And if you flip to the last page,
4 do you see where it says, "Exhibit 1007, page
5 46 of 46"?

6 A Yes, I see that.

7 Q Can you please turn to page 85 in
8 Exhibit 1007? It is on page 21 of 56 of the
9 exhibit.

10 A Yes, I see that.

11 Q Can you please review paragraphs 84
12 and 85, and let me know when you've finished
13 that.

14 (Witness reviewing.)

15 A Yes, I see that. I've finished
16 reading it.

17 Q Okay. Do you see the reference
18 at -- in the sentence that runs from -- let's
19 see.

20 So the last line of paragraph 85
21 that's on page 21 refers to, "Such equipment
22 capable of receiving and organizing mission
23 critical packet data transmissions and
24 communications according to timeline data
25 from a plurality of handheld devices."

1 Do you see the reference to packet
2 data transmissions?

3 A Yes, I see that.

4 I guess you're going based on the
5 page numbers you had mentioned in the bottom
6 left, which I just noticed are different than
7 the page numbers shown at the top of each
8 page. But yeah, that's within paragraph 85,
9 and I see the text you're referring to.

10 Q Do you know what packet data
11 transmissions are?

12 A Yes.

13 Q And what are packet data
14 transmissions?

15 A That would be a transmission
16 between software components in which data is
17 exchanged. And in this particular case, it's
18 packet data, meaning the data is stored
19 within a packet, which is sort of like a
20 digital envelope that carries information for
21 some recipient and usually includes some
22 information about where the information is
23 supposed to go and who the recipient is.

24 And so, the data would be
25 transmitted in the form of packets like that

1 in this case.

2 Q Based on paragraphs 84 and 85 of
3 Walker, do you agree that, "The preferred
4 embodiment of the data recording storage
5 facility 7 includes equipment capable of
6 receiving and organizing mission critical
7 packet data transmissions and communications
8 according to timeline data from a plurality
9 of handheld devices"?

10 A I believe that -- that what's in
11 paragraph 85 is a description of the
12 preferred embodiment of the data recording in
13 storage facility 7, and I believe you read
14 that passage correctly from paragraph 85.

15 Q Can you please turn to paragraph 97
16 of Walker?

17 A Okay. I'm at paragraph 97.

18 Q Can you please review paragraph 97,
19 and let me know when you're done.

20 (Witness reviewing.)

21 A Okay. I've finished reading that.

22 Q Do you see that Walker discloses
23 that, "The data storage facility 7 creates a
24 unique electronic file to hold all data
25 recorded during the call into this unique

1 file."

2 A Yes, I see that sentence.

3 Q Then it says, "A new file is
4 created for each new call received by the
5 data storage facility 7. A database link
6 between each file and the device owner's
7 identity or account is made enabling the
8 device owner and the data storage facility 7
9 to look up and access files in the future,
10 which have previously been recorded by the
11 device owner."

12 Do you see that?

13 A Yes, I see that.

14 Q Do you agree that for data
15 transmitted from the mobile device to the
16 data storage facility 7 to be stored in the
17 unique electronic file that data would need
18 to be transmitted with information that
19 associates it with that electronic file?

20 MS. MISBAH: Objection, form.

21 A I don't think I would agree with
22 that, no.

23 Q Okay. So how could data to be
24 stored in the data -- to the data -- let me
25 start over.

1 So you agree that the data storage
2 facility 7 creates a unique electronic file
3 to hold all the data recorded during the
4 call, right?

5 A Yes. I believe you read that
6 correctly.

7 Q Do you agree that the mobile device
8 transmits data to the data storage facility 7
9 while recording into the file?

10 A I agree that the handheld device
11 communicates with the data storage facility
12 and -- and transmits data to the data storage
13 facility, and that the data storage facility
14 creates a unique electronic file to hold all
15 the data.

16 Q Can you turn to paragraph 99 of
17 Walker?

18 A Okay. I'm at paragraph 99.

19 Q So paragraph 99 says, "The device
20 begins transmitting ongoing streaming video
21 and sound data and other data to the data
22 storage facility 7, where compatible
23 recording equipment is permanently on standby
24 to receive, record and log the automatic
25 transmission of mission critical data from

1 the handheld device 1 in realtime."

2 Do you see that?

3 A Yes, I see that.

4 Q So do you agree that the ongoing
5 streaming video and sound data and other data
6 that is transmitted to the data storage
7 facility is recorded into this unique
8 electronic file created by the data storage
9 facility 7?

10 MS. MISBAH: Objection, form.

11 A I think that that is certainly
12 possible that the ongoing streaming video and
13 sound data would be included in the unique
14 electronic file that is created as described
15 in paragraph 97.

16 Q All right. So when the data
17 storage facility receives this streaming
18 video and sound data and other data while
19 recorded into the electronic file, do you
20 agree that the storage facility has to be
21 able to associate that received data with the
22 electronic file?

23 MS. MISBAH: Objection, form.

24 A You used the word "associate." I
25 think the specification, at least this

1 passage of the specification, describes the
2 electronic file as holding the data.

3 So to the extent that "holding" is
4 a form of "association," I would agree with
5 you.

6 Q I'll rephrase my question to
7 clarify it.

8 When the data storage facility
9 receives the streaming video and sound data
10 and other data, do you agree that the storage
11 facility has to be able to hold that data in
12 the unique electronic file?

13 MS. MISBAH: Objection, form.

14 A I think that there's a system
15 disclosed here in which it -- in which the
16 electronic file can hold that data.

17 Q When the data storage facility
18 receives the streaming video and sound data
19 and other data from the handheld device,
20 Walker discloses that data is stored in a
21 unique electronic file.

22 Is that right?

23 A Yes, or at least it can be in at
24 least one embodiment.

25 Q And so, for the data storage

1 facility to know where to store the received
2 data, doesn't the received data need to
3 include information to identify the file to
4 which it needs to be recorded?

5 MS. MISBAH: Objection, form.

6 THE WITNESS: Could you read me
7 the -- read the question back for me one
8 time?

9 (Whereupon, the record was read
10 back by the reporter.)

11 A I would agree that the data storage
12 facility includes a mechanism for putting
13 received data into the unique electronic file
14 that was created for that call as it says in
15 paragraph 97.

16 Q Do you agree that the mechanism for
17 putting the received data into the unique
18 electronic file must include considering data
19 that was transmitted with the video sound and
20 other data to identify the file into which it
21 needs to be recorded?

22 MS. MISBAH: Objection, form.

23 A I think that it certainly could
24 include that, yes.

25 Q My question was, do you agree that

1 the mechanism for putting the received data
2 into the electronic file must include
3 considering data transmitted with the video
4 sound and other data to identify -- to
5 identify the file into which it needs to be
6 recorded?

7 MS. MISBAH: Objection, form.

8 A I guess since you're asking whether
9 it must include that, the question is, is
10 there some mechanism that the data storage
11 facility could use that would not include
12 using the received data.

13 And I'm not sure I considered that
14 hypothetical previously, but as far as I
15 know, there's not any specific mechanism for
16 performing this function that's disclosed in
17 Walker.

18 Of course, if I have forgotten
19 something because this is one of the
20 lengthier references, please point me to that
21 to refresh my memory.

22 Q I want to try to approach this in a
23 little bit of a different way.

24 To summarize the operation that
25 Walker discloses --

1 A I'm sorry, was that a question for
2 me?

3 Q No, I'm forming my question.
4 I'm sorry.

5 A Okay, sure.

6 Q If you can go back to paragraph 92
7 of Walker.

8 A Okay. I'm at paragraph 92.

9 Q Walker explains in paragraph 92
10 that, "On pressing the eyewitness button 12,
11 a series of automatic parallel or sequential
12 actions are instantly initiated."

13 Do you see that?

14 A Yes, I see that.

15 Q And then in paragraphs 93 through
16 101, Walker discloses a series of eight
17 actions, correct?

18 A There are eight numbered paragraphs
19 here describing a series of automatic
20 parallel or sequential actions.

21 I would need to read through those
22 to confirm that none of the -- none of the
23 eight paragraphs contains more than one
24 action, for example, but I would agree that
25 there's eight paragraphs of description of a

1 series of automatic parallel or sequential
2 actions.

3 Q Paragraph 97 of Walker discloses
4 that one of those actions is that, "The
5 handheld device 1 communicates with the data
6 storage facility 7 through the always
7 connected wireless connection to the cellular
8 network 4."

9 Is that right?

10 A Yes, you read that correctly.

11 Q And one of those actions also
12 described in paragraph 97 is that, "The data
13 storage facility 7 creates a unique
14 electronic file to hold all data recorded
15 during the call into this unique file,"
16 right?

17 A Yes, I see that.

18 Q And then in paragraph 99, one of
19 the actions describes, "The device begins
20 transmitting the ongoing streaming video and
21 sound data and other data to the data storage
22 facility 7 where compatible recording
23 equipment is permanently on standby to
24 receive, record and log the automatic
25 transmission of mission critical data from

1 the handheld device 1 in realtime."

2 So to summarize, Walker discloses
3 that on pressing the eyewitness button 12,
4 the handheld device communicates with the
5 data storage facility, creates a unique
6 electronic file to hold all data recorded
7 during the call, and the device begins
8 transmitting ongoing streaming video and
9 sound data and other data to the data storage
10 facility 7 or recorded into this electronic
11 file.

12 Is that right?

13 MS. MISBAH: Objection, form.

14 A That's generally correct, although
15 you may have misspoke unless I misheard you
16 because I think the way you summarized it
17 made it sound as though the handheld device
18 creates the unique electronic file, and as it
19 says in paragraph 97, the data storage
20 facility creates the unique electronic file.

21 I believe the rest of your summary
22 was correct as far as I heard.

23 Q I'll rephrase to clarify.

24 So Walker discloses that on
25 pressing the eyewitness button 12, the

1 handheld device communicates with the data
2 storage facility. The data storage facility
3 creates an electronic file to hold all data
4 recorded during the call, and the device
5 begins transmitting ongoing streaming video
6 and sound data and other data to the data
7 storage facility or recording into the
8 electronic file.

9 Is that correct?

10 A I believe that is correct, yes.

11 Q Other than -- strike that.

12 So do you agree that for the data
13 storage facility to be able to receive the
14 streaming video, sound and other data and to
15 record it into the electronic file, the
16 mobile device must have sent data along with
17 the streaming video sound and other data so
18 that the data storage facility could
19 associate that data with the electronic file
20 for storage in the electronic file?

21 MS. MISBAH: Objection to form.

22 A So as I said before, I believe that
23 certainly is one possible way that the
24 mechanism within the data storage facility
25 could work such that when video in the

1 storage facility can record it within the
2 unique electronic file that is the file for
3 that call over which the video and sound data
4 is being received.

5 Again, I think your question is
6 essentially asking is there any mechanism in
7 which the data storage facility could
8 accomplish that without using something that
9 is transmitted in a handheld device, and as I
10 said, that's a hypothetical I've not
11 specifically considered until now.

12 So it's hard for me to say that it
13 could not possibly occur, but as far as I
14 remember, there's not any machine disclosed
15 within Walker for how that is accomplished.

16 Q Okay. So sitting here today,
17 you're unable to think of any other plausible
18 mechanism by which Walker's data storage
19 facility could store the transmitted video,
20 sound and other data that does not involve
21 considering data transmitted with the video
22 sound and other video?

23 MS. MISBAH: Objection, form.

24 A You were -- you got a little choppy
25 there just in the middle of the question.

1 Please repeat that one.

2 Q Sure.

3 Sitting here today, are you unable
4 to think of any other plausible mechanism by
5 which Walker's data storage facility could
6 store the transmitted video, sound and other
7 data into the unique electronic file that
8 does not involve the mobile device
9 transmitting data to associate the
10 recorded — I'll just start over. I know
11 it's a long question.

12 A I think I heard the question that
13 time, but I'm not sure if you were finished
14 with it.

15 Q No, I just want to rephrase.
16 That's all. So give me a second.

17 At this point, we agree that --
18 strike that.

19 Is it your opinion that Walker's
20 mobile device could transmit video, sound and
21 other data, including data to identify the
22 file to which it is to be recorded to the
23 data storage facility?

24 A I would agree that the received
25 data could include information such as

1 ascender or IP address that the data storage
2 facility might consider in determining how to
3 record the incoming data.

4 Q Do you agree that Walker's mobile
5 device could transmit video, sound and other
6 data, including information to identify the
7 sender or an IP address of the mobile device
8 that the data storage facility would consider
9 in determining what file to record the data
10 in?

11 MS. MISBAH: Objection, form.

12 A I don't believe that Walker
13 discloses a transmission of the device
14 owner's identity as far as I recall.
15 However, as we discussed earlier today, this
16 data could be transmitted in the form of for
17 example TCP/IP packets, which I believe this
18 is disclosed by Walker, and such a packet
19 would include a sender's IP address.

20 And the data storage facility, in
21 theory, could consider that along with other
22 information in determining how to record the
23 incoming data.

24 Q Okay. Unless the mobile device
25 transmits some information along with the

1 video, audio and other data that allows the
2 data storage facility to identify the file to
3 which it is to be recorded, is there any
4 other way for the data storage facility to
5 record the received information into that
6 file?

7 MS. MISBAH: Objection, form.

8 A I think that the data storage
9 facility could internally create an
10 association between the unique electronic
11 file when it is created and the call for
12 which the file was created, because as it
13 says in paragraph 97, the unique electronic
14 file is created for each new call received by
15 the data storage facility, and the data
16 storage facility then could subsequently
17 route any streaming video or sound data
18 received through that same call to the file
19 that the data storage facility created for
20 that call.

21 Q So in that mechanism, the mobile
22 device would have to transmit information
23 along with the streaming video or sound data
24 so that the data storage facility could
25 associate the streaming video or sound data

1 into the file created for that call.

2 Is that right?

3 MS. MISBAH: Objection, form.

4 A I guess it potentially depends
5 on -- on how you -- how you look at it, but
6 what I was trying to explain was that the
7 data storage facility in this hypothetical
8 would be using the information regarding
9 which -- over which call the video arrived to
10 determine which electronic file should hold
11 it rather than examination of the data
12 itself.

13 Again, I'm speaking sort of
14 generally here as a hypothetical because this
15 is not something that is disclosed in Walker
16 as far as I know.

17 Q Okay. So in -- in this
18 hypothetical that you're talking about, the
19 packets including the video, audio and other
20 data would need to identify the call to which
21 the video, audio and other data is a part of,
22 right?

23 MS. MISBAH: Objection, form.

24 A You are, I guess, testing my memory
25 a bit here on exactly what's in an IP packet

1 header or TCP packet header, which of course,
2 I don't have that specification in front of
3 me, but depending on the specific network
4 protocols that are involved in, the packet
5 headers would generally include information
6 about who's the sender and the recipient.
7 And that would be part of how those packets
8 are organized into a -- a stream for a
9 specific connection between two computers at
10 the -- at the recipient, which, in this case,
11 is the data storage facility.

12 I believe the packets would also
13 contain, for example, a sequence number that
14 the recipient uses to ensure the packets are
15 arranged into the correct order at the
16 recipient.

17 Q Can you think of any way in which
18 Walker's mobile device could provide Walker's
19 data storage facility 7 video, audio and
20 other data and without providing any other
21 information the data storage facility could
22 store that received information into the
23 unique electronic file created for that call?

24 MS. MISBAH: Objection, form.

25 A I would agree that if the --

1 assuming that the data, whether video and
2 sound data or other data is being received in
3 the form of packets over a network, the
4 recipient -- any recipient, including the
5 data storage facility here, needs to examine
6 the headers of the packets in order to be
7 able to receive them and organize them into a
8 coherent data stream that is a necessary part
9 of any packet -- packet-based network
10 protocol.

11 So I would agree that there must be
12 an examination of the packet headers at the
13 data storage facility when it receives packet
14 data.

15 Q Would you agree that the packet
16 must include information that allows the data
17 in the packet to be associated with the
18 unique electronic file created for that call?

19 MS. MISBAH: Objection, form.

20 A I would agree that it could be one
21 possible way of doing that.

22 Q Can you think of any other way?

23 A Repeat for me one more time. Any
24 other way other than --

25 Q My question was originally, would

1 you agree that the packet data must include
2 information that allows the data in the
3 packet to be associated with the unique
4 electronic file created for that call?

5 And you said, I would agree that it
6 could be one possible way of doing that. And
7 my question was, is there any other way that
8 you can think of?

9 Because you say it's only -- it's
10 possible, which suggests that there's other
11 ways.

12 A Well, I think what I had suggested
13 a few minutes ago was that the data storage
14 facility after the -- after the packets had
15 been properly organized into a data stream
16 that -- where all the packets had been placed
17 in the correct order without any gaps, for
18 example, that data stream can be associated
19 within the application with a unique
20 electronic file such that the software that
21 is responsible for recording the data does
22 not need to look at the content of the data
23 stream itself.

24 It only looks at which of several
25 possible streams this data arrived over, and

1 it has previously stored an association
2 between that data stream and a unique
3 electronic file that it created when the call
4 was initiated and the -- the data stream was
5 first received.

6 Q Okay. I'm not sure that I'm
7 getting an answer to the question that I'm
8 asking. So let me try, again, to approach
9 this a different way.

10 And maybe, first, it would be
11 helpful to simplify this. So let's talk
12 outside the context of Walker for a moment.

13 Say that -- say that I'm providing
14 pictures to you, okay, and you create a file
15 in your file cabinet that -- where you store
16 my pictures.

17 If you receive a picture, you need
18 to understand who it came from or you need to
19 have some information with that picture to be
20 able to file it in the correct file, right?

21 MS. MISBAH: Objection, form.

22 A I guess when I received the
23 picture, I have to have some way of knowing
24 what file to put it in.

25 Q Right.

1 A That seems clear, yes.

2 Q So in the context of Walker, when
3 Walker's data storage facility received
4 video, audio, what have you, it must have
5 information provided with the video, audio
6 and other data to allow it to store it in the
7 correct file, right?

8 MS. MISBAH: Objection, form.

9 A It depends on -- on what you mean
10 by it must have -- it must contain
11 information.

12 As I said, when the data is
13 received in packet form, the packet headers
14 will contain information that the protocol
15 stack that the recipient uses to organize the
16 incoming packets into data streams in which
17 all of the packets have been arranged in the
18 correct order, because they may have become
19 out of order during transmission, and there
20 are no gaps in the extreme.

21 That stream is then provided to the
22 application program. The application program
23 may receive data through multiple different
24 streams. The application receives data from
25 different streams through different

1 connection objects, assuming this was an
2 object oriented program, for example.

3 Therefore, when data is available
4 on one of those streams, the application
5 program does not need to examine the received
6 data itself in order to know which stream it
7 came from, because it is arriving through a
8 connection object associated with that
9 extreme.

10 By virtue of which connection
11 object the data is being read from, an
12 application program could then write it to
13 the appropriate file. That's the way --
14 that's a typical way an application that
15 receives data from multiple possible sources
16 would handle incoming data.

17 Whether you consider that to be
18 using the received information or not, I
19 guess that's a -- it depends exactly how you
20 parse that, but that's one possible way that
21 the data storage facility might ingest this
22 incoming video and sound data.

23 Q Okay. Going with your
24 hypothetical, in that scenario, a mobile
25 device has to transmit, has to provide the

1 video, audio and sound data along with some
2 information that allows the data storage
3 facility to do whatever it's going to do to
4 record that information into the unique
5 electronic file created for that call, right?

6 MS. MISBAH: Objection, form.

7 A As I said before, if it's packet
8 data, which is at least one of the things
9 disclosed here, the packet headers
10 necessarily must be examined by the recipient
11 to organize the incoming packets into
12 coherent streams that are associated with
13 different senders.

14 I agree that that must occur at any
15 recipient that receives packet data from
16 multiple senders, including the data storage
17 facility discussed here.

18 I would disagree that after that
19 has occurred, it is further necessary for an
20 application at the data storage facility to
21 examine the received data to know which
22 unique file should hold it.

23 If -- once the job of organizing
24 the incoming packets into streams associated
25 with different connections has been done, and

1 provided that the application previously
2 stored an association between the connection
3 or call and the unique electronic file that
4 was created for that call, there is no
5 longer -- it's no longer necessary for the
6 application program to do any further
7 examination of the received data, because it
8 will determine which electronic file to
9 record the data in by virtue of which
10 connection that data was received through
11 rather than an examination of the data
12 itself.

13 Q Do you agree that Walker discloses
14 that its mobile device transmits streaming
15 video into the data storage facility?

16 A Yes.

17 Q Do you agree that Walker discloses
18 its mobile device transmits audio data to the
19 data storage facility?

20 A Yes.

21 Q Do you agree that Walker discloses
22 that its mobile device transmits location
23 data into the data storage facility?

24 A I believe that's correct, but I
25 don't recall if it's in this particular

1 portion of the reference. So perhaps you can
2 point me to that paragraph to refresh my
3 memory.

4 Q Do you agree that Walker's mobile
5 device must transmit along with the video
6 data and audio data other information that
7 allows the data storage facility to record
8 the video and audio data into the unique
9 electronic file created for that call?

10 A If you are including within your
11 definition of what the mobile device
12 transmits packet header information and you
13 consider that to be something that is used at
14 least indirectly in the mechanism that I
15 described before, then the answer is yes,
16 because any recipient of packet data such as
17 TCP/IP packet data must necessarily examine
18 the headers, the packet headers in order to
19 organize the data into coherent data streams
20 for the application.

21 And I will further agree that the
22 data storage facility would not be able to
23 receive or record any kind of data if it
24 wasn't organized into a coherent stream as
25 required by the TCP protocol, for example.

1 Q All right.

2 MR. REIDY: We can take a break
3 now, ten minutes.

4 (Brief recess taken.)

5 Q Referring back to paragraph 97 of
6 Walker, Walker explains that, as we've
7 discussed, the data storage facility creates
8 this unique electronic file into which the
9 transmitted video, audio and other data is
10 stored, right?

11 A Yes.

12 Q And Walker further discloses that a
13 database link between each file and the
14 device owner's identity or account is made,
15 right?

16 A Yes.

17 Q Do you agree that the mobile device
18 must transmit some information that allows
19 the data storage facility to create the
20 database link between the file and the device
21 owner's identity?

22 MS. MISBAH: Objection, form.

23 A I would agree that there must be
24 something within the transmitted information
25 that allows the data storage facility to

1 create that link.

2 Q Would you agree that if a mobile
3 device transmits video data and audio data
4 over the Internet, is it that the video and
5 audio data would have to be packetized before
6 it is transmitted?

7 MS. MISBAH: Objection, form.

8 A I believe for it to go over --
9 through multiple networks on the Internet,
10 which I think is what you mean by Internet,
11 then it does have to be packetized, yes.

12 There are some protocols that don't
13 use packets, but for data to be transmitted
14 across networks within the Internet, I
15 believe that it must be in the form of
16 packets.

17 Q Okay.

18 MR. REIDY: I have no further
19 questions.

20 MS. MISBAH: I don't have any
21 redirect.

22 MR. REIDY: All right.

23 Thank you very much for your time,
24 Dr. Edwards.

25 THE WITNESS: Thank you.

1 (Whereupon, the deposition was
2 concluded at 2:35 p.m.)

3 (Witness was excused.)

4 MS. MISBAH: I will take a rough
5 draft and 5-day.

6 Thanks.

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1 C E R T I F I C A T E

2 I, CHARLENE FRIEDMAN, a Certified Court
3 Reporter and Notary Public, qualified in and for
4 the State of New Jersey do hereby certify that
5 prior to the commencement of the examination GEORGE
6 EDWARDS, PH.D. was duly sworn by me to testify to
7 the truth the whole truth and nothing but the
8 truth.

9 I DO FURTHER CERTIFY that the foregoing
10 is a true and accurate transcript of the testimony
11 as taken stenographically by and before me at the
12 time, place and on the date hereinbefore set forth.

13 I DO FURTHER certify that I am neither a
14 relative of nor employee nor attorney nor counsel
15 for any of the parties to this action, and that I
16 am neither a relative nor employee of such attorney
17 or counsel, and that I am not financially
18 interested in the action.

19
20 
21

22 CHARLENE FRIEDMAN, RPR, CRR, CCR of the
23 State of New Jersey
24 License No: 30XI00204900
25 Date: October 30, 2024

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DEPOSITION ERRATA SHEET

Case Caption: Samsung v. Fendgo

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury
that I have read the entire transcript of
my Deposition taken in the captioned matter
or the same has been read to me, and
the same is true and accurate, save and
except for changes and/or corrections, if
any, as indicated by me on the DEPOSITION
ERRATA SHEET hereof, with the understanding
that I offer these changes as if still under
oath.

Signed on the _____ day of
_____, 20____

GEORGE EDWARDS, PH. D.

1

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