

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

SAMSUNG ELECTRONICS CO.,)
LTD., and SAMSUNG ELECTRONICS,)
AMERICA, INC.,)
)
Petitioners,)
) Case IPR
Vs.) 2024-00114
)
FENDGO, LLC,)
) US Patent No.
Patent Owner.) 11,265,404
-----/

REMOTE DEPOSITION OF WILLIAM MICHALSON, Ph.D.
(Taken Virtually by Petitioners)
Tuesday, July 30th, 2024
9:12 a.m. EDT

Certified Stenographic Court Reporter



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VIRTUAL APPEARANCES

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ALSO PRESENT VIA VIDEOCONFERENCE:

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1 DEPOSITION OF WILLIAM MICHALSON, Ph.D., a
2 witness called on behalf of Respondents, before Amy A.
3 Brauser, RPR RMR CRR, Certified Stenographic Court
4 Reporter and Notary Public, in and for the
5 Commonwealth of Virginia, on Tuesday, the 30th day of
6 July, 2024, commencing at 9:12 a.m.

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1 INDEX OF EXAMINATIONS

2 By Ms. Misbah Page 5

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4 INDEX OF EXHIBITS

5 NUMBER DESCRIPTION MARKED/IDENTIFIED

6 Exhibit 1 Declaration of William R. 10

Michalson, Ph.D., in Case

7 IPR2024-00114

8 Exhibit 2 Declaration of William R. 11

Michalson, Ph.D., in Case

9 IPR2024-00113

10 Exhibit 3 United States Patent No. 15

11,265,404

11

Exhibit 4 Application Number 13/897,353 27

12

Exhibit 5 United States Patent No. 33

13 14,460,590

14 Exhibit 6 UK Patent Application 0312170.4 36

15 Exhibit 7 International Publication Number 38

WO 2004/056000

16

Exhibit 8 United States Patent No. 52

17 6,839,552

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1 PROCEEDINGS

2 WILLIAM MICHALSON, Ph.D.,

3 after having been first duly sworn under penalty of

4 perjury by the certified stenographer, was

5 examined and testified as follows:

6 EXAMINATION

7 BY MS. MISBAH:

8 Q. Good morning, Dr. Michalson. Would
9 you, please, state your full name for the record?

10 A. Yes. My full name is William Ryan
11 Michalson.

12 Q. And where are you sitting today for
13 your deposition?

14 A. I'm at the Arnold & Porter offices in
15 Boston.

16 Q. And is there anyone in the room with
17 you?

18 A. There is. Attorney Reidy.

19 Q. Is that the only person in the room?

20 A. Yes.

21 Q. Do you have anything in front of you
22 today?

23 A. I have two binders, one with my
24 declaration for the 113 IPR, and that has some of
25 the exhibits referenced in my declaration. And I



1 have another binder with my declaration and
2 exhibits for the 114 IPR.

3 Q. Are the documents in the binder marked
4 up in any way?

5 A. No.

6 Q. Do they have any notes on them?

7 A. No.

8 Q. And besides those two binders, do you
9 have any notes in front of you?

10 A. No.

11 Q. And you have the Zoom screen in front
12 of you. Do you have any other screens open in the
13 computer that's in front of you?

14 A. I have the Magna Egnyte screen open as
15 well.

16 Q. And that would be the exhibit share
17 screen?

18 A. Yes, that's correct.

19 Q. And no other browser tabs, nothing else
20 open?

21 A. That's correct.

22 Q. So, Dr. Michalson, you have been
23 deposed before, right?

24 A. Yes.

25 Q. Approximately how many times?



1 A. Many. I usually say dozens.

2 Q. Would you like me to go through the
3 rules of the deposition with you? Are you
4 comfortable with just proceeding without those?

5 A. That's entirely your choice.

6 Q. Okay. I can quickly walk you through
7 them just so we have a refresher.

8 So as you know, I'll ask you some
9 questions. You will be providing me with some
10 answers. Your counsel may interject with
11 objections, but unless he tells you not to answer,
12 I'm entitled to an answer from you.

13 Does that make sense?

14 A. Yes.

15 Q. And do you understand that you are
16 under the same obligation to tell the truth today
17 as you would be in front of a judge or jury?

18 A. Yes.

19 Q. And as you know, and the court reporter
20 has mentioned this before, she can only record one
21 person at a time, so let's try and make sure we
22 don't speak over each other. I think we're doing a
23 great job already. If I ever interrupt you,
24 please, let me know, and I will let you finish your
25 answer.



1 A. Okay.

2 Q. And if you don't understand any of my
3 questions, please ask. If you answer a question
4 that I ask, I'll assume you've understood the
5 question that I've posed.

6 Does that make sense?

7 A. It does.

8 Q. And we can take a break whenever you'd
9 like unless there's a question pending, and if
10 there is a question pending, I just ask that you
11 provide me with an answer before we take a break.
12 Understood?

13 A. That's fine.

14 Q. Is there anything today that would
15 prevent you from answering my questions truthfully
16 or fully?

17 A. Not that I'm aware of.

18 Q. Is there any medication that you might
19 be taking that could interfere with your ability to
20 testify today?

21 A. No.

22 Q. All right. Dr. Michalson, what did you
23 do to prepare for today's deposition?

24 A. I read through my declarations. Read
25 through the exhibits, the main exhibits of my



1 declarations. I looked at the Board's institution
2 decision, and I looked at the Patent Owner
3 preliminary responses.

4 Q. Did you meet with anybody to prepare
5 for today's deposition?

6 A. Yes, I met with counsel.

7 Q. And who specifically did you meet with?

8 A. Primarily, Mr. Reidy.

9 Q. Anyone else?

10 A. There were two other attorneys on one
11 of the calls. One of them was named John. I don't
12 remember the other name.

13 Q. And how many times did you meet with
14 these three attorneys?

15 A. I had two teleconference -- or one
16 teleconference session last week and one in-person
17 session yesterday.

18 Q. How long were each of these sessions?

19 A. About four hours.

20 Q. What materials did you review?

21 A. The same materials I listed.

22 Q. And what else was discussed during
23 these sessions?

24 MR. REIDY: Objection, calls for
25 attorney-client privileged information.



1 THE WITNESS: Yeah, can you repeat the
2 question, please?

3 BY MS. MISBAH:

4 Q. Without waiving any privilege,
5 Dr. Michalson, if there's any nonprivileged answer
6 to this question, you can provide that. If not, I
7 can move on.

8 A. I've lost the question at this point.

9 Q. My apologies. I just said, what did
10 you and counsel discuss during your meetings?

11 MR. REIDY: Objection, privilege. I
12 instruct the witness not to answer.

13 BY MS. MISBAH:

14 Q. Okay. Dr. Michalson, let's -- I'm
15 going to upload onto the exhibit share what will be
16 marked as Exhibit 1 for this deposition.

17 (Exhibit Number 1 was marked for identification.)

18 BY MS. MISBAH:

19 Q. Please let me know if you can -- please
20 let me know if you can see it in the shared folder.

21 A. I've just received the -- my
22 declaration. And which declaration? It's the 114.
23 It's the one for IPR2024-00114.

24 Q. And is this a fair and accurate copy of
25 the declaration for your 114 IPR?



1 A. Yes, this would be the declaration for
2 my 114 IPR.

3 Q. I'm also adding in what will be marked
4 as Exhibit 2.

5 (Exhibit Number 2 was marked for identification.)

6 BY MS. MISBAH:

7 Q. Do you see that in the exhibit share?

8 A. I do.

9 Q. And could you tell me what that is?

10 A. That's my declaration for the 113 IPR.

11 Q. Is that a fair and accurate copy of
12 your declaration for the 113 IPR?

13 A. It appears to be.

14 Q. Dr. Michalson, let's turn to Exhibit 1.
15 I'd like to direct your attention to Paragraph 28
16 of this exhibit.

17 A. Paragraph 28?

18 Q. That's right.

19 A. I have it.

20 Q. Could you silently read Paragraph 28
21 and let me know when you're done?

22 (Witness reviews document.)

23 A. Yes, I'm fine.

24 Q. Now, let's turn to Exhibit 2, and I'd
25 like to direct your attention to Paragraph 25.



1 A. I'm there.

2 Q. Could you silently read Paragraph 25
3 and let me know when you're done?

4 A. I'm done.

5 Q. Dr. Michalson, you agree with me that
6 Paragraphs 28 in Exhibit 1 and Paragraph 25 in
7 Exhibit 2 are identical?

8 A. They appear to be, yes.

9 Q. So I have a few questions, and you can
10 refer to either paragraph, but it's just about
11 what's noted in these paragraphs.

12 So you say that as part of this report,
13 you applied your knowledge on what is the field of
14 the '404 Patent?

15 A. Yes.

16 Q. What is your understanding of "the
17 field of the '404 Patent"?

18 A. Portable device -- basically portable
19 devices, communications, data transfer, the
20 application of which happens to be security
21 systems, but it's primarily -- the patent is
22 primarily directed to mobile devices and the
23 transfer of data from those devices.

24 Q. And you said that you relied on your
25 own knowledge and experiences gained from your work



1 in the field of the '404 Patent?

2 A. Yes.

3 Q. What knowledge and experiences are you
4 referring to?

5 A. I've been working with communications
6 and computer systems since the 1980s, and, you
7 know, since the '90s, that includes things like
8 cellular systems and other systems. But I've
9 worked with radio systems for decades.

10 Q. What kind of radio systems?

11 A. Oh, geez. Anything. Starting with
12 early 27-megahertz radio control systems to packet
13 radio systems to military command and control
14 systems to secure communication systems, land
15 mobile radios or via satellites. You know, later
16 in history, machine-to-machine communications.

17 I've been doing communications for a
18 long time.

19 Q. Right. Understood.

20 And you said that you worked on
21 cellular systems. What kind of cellular systems
22 did you work on?

23 A. I'm not sure what you mean by "what
24 kind of cellular systems."

25 Q. I'm just trying to understand your



1 background on cellular systems. You mentioned
2 that -- in your answer that you've been working on
3 cellular systems for decades. I just want to get a
4 sense of what type of cellular systems you're
5 referring to.

6 A. Mostly machine-to-machine
7 communications. So data transfer systems for,
8 loosely speaking, telematics where I'm trying to
9 get information from a mobile platform to a base
10 station of some kind.

11 Q. And you also mentioned in Paragraph 25
12 of Exhibit 2 and Paragraph 28 of Exhibit 1, you
13 relied on your experience in working with others
14 involved in this field and related disciplines.

15 Is there anyone specific that you're
16 referring to who -- when you say "others involved
17 in this field"?

18 A. I'm not referring to anybody in
19 specific, but many of the projects that I've done
20 over the past few decades with students. At
21 Worcester Polytechnic Institute, all of our
22 students are required to undergo a year-long
23 project that we call the "Major Qualifying Project"
24 or MQP. And many of those have involved remote
25 data transfer, ranging from data transfer on trains



1 to automobiles to satellites to boats. So I've
2 worked with students in helping them realize
3 systems like that.

4 I have also, in my own personal work,
5 have worked with data transfer systems, you know,
6 wireless data transfer.

7 I've also done numerous master's
8 projects, master's degree projects, and Ph.D.
9 dissertations involving communication systems,
10 cellular and other types of data transfer systems.

11 I've also worked in the context of
12 litigation on a variety of different vehicle
13 telematic systems.

14 (Exhibit Number 3 was marked for identification.)

15 BY MS. MISBAH:

16 Q. Dr. Michalson, I'm sharing in the
17 exhibit share Exhibit 3. Let me know once you see
18 it.

19 A. Okay. I have it.

20 Q. Do you see that Exhibit 3 is a copy of
21 US Patent Number 11,265,404?

22 A. Yes.

23 Q. And this is the patent that is the
24 subject of both your declarations, correct?

25 A. Yes.



1 Q. This is a fair and accurate copy of the
2 patent that you reviewed in coming to your
3 conclusions?

4 A. It looks like it is, yes.

5 Q. So, Dr. Michalson, this patent was --
6 you agree with me that this patent was issued by
7 the United States Patent and Trademark Office,
8 correct?

9 A. Yes.

10 Q. And you agree that -- well, I'll
11 backtrack.

12 If you look at Paragraph 16, the
13 parenthetical on the cover of the patent, it says,
14 "Related US Application Data."

15 Do you see that?

16 A. Yes.

17 Q. And it says "continued" at the end of
18 that paragraph?

19 A. Yes.

20 Q. So if you go to the next page, it
21 continues on to Paragraph 60 of page 2 of the
22 '404 Patent. Do you see that?

23 A. Yes.

24 Q. And it says, "Provisional application
25 Number 60/643,865," correct?



1 A. Correct.

2 Q. Which was filed on January 14, 2005?

3 A. That's what it says, yes.

4 Q. And you understand that this date,
5 January 14, 2005, is the priority date for the
6 '404 Patent, correct?

7 MR. REIDY: Objection, form.

8 THE WITNESS: That depends somewhat on
9 legal interpretation relative to the claims.
10 My understanding is that that can establish a
11 priority date, assuming that the information
12 that's disclosed in that provisional covers,
13 you know, a claim that is being challenged.

14 BY MS. MISBAH:

15 Q. Assuming that this provisional covers
16 the claims of the '404 Patent, you agree that the
17 '404 Patent is noted as having a priority date of
18 January 14, 2005?

19 MR. REIDY: Objection, form.

20 THE WITNESS: That -- again, you're
21 getting into something that requires a legal
22 decision. In general, that can establish a
23 priority date, but there are circumstances in
24 which that is not the priority date of the
25 patent.



1 BY MS. MISBAH:

2 Q. Dr. Michalson, you agree with me that,
3 in general, this establishes the priority date,
4 provisional application from which the patent
5 issues, correct?

6 MR. REIDY: Objection, form.

7 THE WITNESS: It can under some
8 circumstances, yes.

9 BY MS. MISBAH:

10 Q. And in your opinions that you provided
11 in the 113 IPR, you rely on January 14, 2005 as the
12 priority date?

13 MR. REIDY: Objection, form.

14 THE WITNESS: In the -- for my
15 113 declaration, that's correct.

16 BY MS. MISBAH:

17 Q. Turning to your 114 declaration then.
18 That would be Exhibit 1 for this deposition.

19 A. I have it.

20 Q. For the 114 declaration, it is your
21 opinion that the '404 Patent is not entitled to the
22 January 14th, 2005 priority date, correct?

23 A. That's correct.

24 Q. It is your opinion that it's not
25 entitled -- the '404 Patent is not entitled to a



1 priority date earlier than January 30, 2019,
2 correct?

3 MR. REIDY: Objection, form.

4 THE WITNESS: January 30, 3-0, yes.

5 BY MS. MISBAH:

6 Q. And January -- my apologies.

7 A. 2019, I believe.

8 Q. And January 30, 2019 is the filing date
9 of the '404 Patent?

10 A. Yes.

11 Q. So in coming to this conclusion,
12 Dr. Michalson, you analyzed the "ready itself"
13 limitation --

14 A. Yes.

15 Q. -- in Claim 1 of the patent?

16 A. Yes.

17 Q. And you identify this limitation as
18 Limitation 1[d], correct?

19 MR. REIDY: Objection, form.

20 BY MS. MISBAH:

21 Q. This would be page 29 of Exhibit 1.

22 (Witness reviews document.)

23 A. Yes, 1[d].

24 Q. And if you look at Paragraph 49 of
25 Exhibit 1, your opinion is that: (Reading)



1 The "ready itself" limitation
2 in Limitation 1[d] lacks written
3 description support in the
4 '353 application.

5 Correct?

6 A. That's correct.

7 Q. What is your understanding of the
8 "written description" requirement?

9 MR. REIDY: Objection, form.

10 THE WITNESS: I think I cover that.
11 Yeah, I cover that, starting in Paragraph 25
12 of my declaration, where I say that:
13 (Reading)

14 I've been informed by
15 Petitioners' counsel that the written
16 description requirement is met if the
17 applicant conveys in the
18 specification, with reasonable clarity
19 to those skilled in the art, that he
20 or she possessed the claimed invention
21 as of the filing date of the
22 application.

23 So that -- I guess there's -- there's
24 two things. You know, one is have they
25 described in the specification that the --



1 have they disclosed that what they're claiming
2 is actually disclosed in the specification.
3 And also, there's a potential enablement. You
4 know, did they disclose enough information in
5 there to actually -- for a person of skill in
6 the art to implement it.

7 BY MS. MISBAH:

8 Q. How did you evaluate that
9 Limitation 1[d] did not have sufficient written
10 description in the '353 application?

11 MR. REIDY: Objection, form.

12 THE WITNESS: Well, I reviewed the
13 '404 Patent. I reviewed the -- what was
14 being claimed as that -- well, the
15 '353 application, which had the earlier
16 priority date, and I looked at the
17 provisional application and did not see any
18 discussion of the panic button being used to
19 ready itself.

20 BY MS. MISBAH:

21 Q. Dr. Michalson, the '353 application is
22 the parent application for the '404 Patent,
23 correct?

24 A. Correct.

25 MR. REIDY: Objection, form.



1 THE WITNESS: Correct.

2 BY MS. MISBAH:

3 Q. If you turn back to Exhibit 3, which is
4 the '404 Patent.

5 A. Okay.

6 Q. If you look again at Paragraph 60, the
7 parenthetical paragraph on the cover.

8 A. Yes.

9 Q. It says that the '404 Patent is
10 division of application number 13/897,353?

11 A. I'm looking at the wrong place in the
12 patent.

13 Yes, Paragraph 60 on the cover page,
14 that's correct.

15 Q. And it says that the '353 application
16 was filed on May 17, 2013?

17 A. Yes.

18 Q. And so in coming to your opinions in
19 the 114 IPR, on the lack of written description
20 support, you're only looking at Limitation 1[d],
21 correct?

22 MR. REIDY: Objection.

23 THE WITNESS: That's correct.

24 BY MS. MISBAH:

25 Q. You're not analyzing any other



1 limitations in Claim 1 to say that the '404 Patent
2 lacks written description support?

3 MR. REIDY: Objection, form.

4 THE WITNESS: Can you repeat that
5 question again, please?

6 BY MS. MISBAH:

7 Q. The question was, you're not analyzing
8 any other limitations in Claim 1 to say -- to come
9 to the opinion that the '404 Patent lacks written
10 description support?

11 MR. REIDY: Objection, form.

12 THE WITNESS: That's correct.

13 BY MS. MISBAH:

14 Q. You don't analyze any other claims in
15 the '404 Patent to come to the conclusion that the
16 '404 Patent lacks written description support,
17 correct?

18 MR. REIDY: Objection, form.

19 THE WITNESS: The remaining claims, 1
20 through 8, all depend on Claim 1, so that --
21 if that element is missing -- or if there's a
22 written description problem with that element
23 in Claim 1, then all of the dependent claims
24 would fail.

25



1 BY MS. MISBAH:

2 Q. I understand that. But you aren't
3 looking at any particular elements in the dependent
4 claims to come to your conclusion that the
5 '404 Patent lacks written description support,
6 right?

7 MR. REIDY: Objection, form.

8 THE WITNESS: That's correct.

9 BY MS. MISBAH:

10 Q. And you're not looking at any of the
11 other independent claims in the '404 Patent, except
12 for Claim 1, to come to your conclusion that the
13 '404 Patent lacks written description support,
14 correct?

15 MR. REIDY: Objection, form.

16 (Witness reviews document.)

17 THE WITNESS: Well, I do go through all
18 of the rest of the claims. So I do discuss
19 all the claims, at least Claims 1 through 8,
20 in my declaration.

21 BY MS. MISBAH:

22 Q. You agree that Claims 1 through 8
23 all -- Claim 1 is Claim 1 and then Claims 2 through
24 8 all depend on Claim 1, correct?

25 A. That's correct.



1 Q. So in the 114 IPR, the only independent
2 claim that you analyze is Claim 1, correct?

3 A. That's correct.

4 Q. You don't look at any other independent
5 claims in the 114 IPR?

6 A. That's correct.

7 Q. So you don't rely on any of the other
8 independent claims besides Claim 1 in coming to
9 your conclusion that the '404 Patent lacks written
10 description support, correct?

11 MR. REIDY: Objection, form.

12 THE WITNESS: I'm only looking at
13 independent Claim 1 relative to that written
14 description issue, that's correct.

15 BY MS. MISBAH:

16 Q. Dr. Michalson, are you familiar with
17 the process of claim construction?

18 A. Generally, yes.

19 Q. Did Petitioners' attorneys ever explain
20 to you how claim construction works in a case?

21 MR. REIDY: Objection.

22 THE WITNESS: I don't know that
23 Petitioners' attorneys explained that, but
24 I've been involved in claim construction in
25 other cases.



1 BY MS. MISBAH:

2 Q. You understand that claim construction
3 is a process by which the meaning and the scope of
4 claim terms is determined, right?

5 A. Yes.

6 Q. And in the 114 declaration, you are not
7 offering any constructions for the limitations or
8 the terms in the '404 Patent, correct?

9 (Witness reviews document.)

10 A. I don't see that I'm discussing claim
11 construction.

12 (Witness reviews document.)

13 A. I don't see in here where I've
14 attempted to do a claim -- I don't see a claim
15 construction section where I am constructing any
16 definition for any claim.

17 Q. Can you repeat --

18 A. Or proposing a definition for any
19 claim.

20 Q. My apologies.

21 So you agree that you're not proposing
22 any claim constructions in the 114 IPR, right?

23 A. It would be plain and ordinary meaning.

24 Q. And you apply the plain and ordinary
25 meaning for the term "ready itself" in coming to



1 your conclusions as well, right?

2 A. That's correct.

3 Q. Dr. Michalson, I'm sharing Exhibit 4.

4 Let me know when you receive it.

5 (Exhibit Number 4 was marked for identification.)

6 THE WITNESS: Okay. I have it.

7 BY MS. MISBAH:

8 Q. This is Exhibit 1006 of the 113 IPR,
9 correct? It has that stamp at the bottom
10 right-hand corner.

11 A. Yeah, that appears to be correct.

12 Q. And this corresponds to the
13 '353 application?

14 A. That's what it looks like.

15 Q. And you reviewed this application in
16 coming to your conclusions in the 114 IPR, right?

17 A. Yes.

18 Q. Could you, please, turn to PDF page 23
19 of the '353 application?

20 A. Okay.

21 Q. So if you look at the paragraph that's
22 in the middle of this page, it discusses a "safety
23 switch," correct?

24 A. They refer to a "separate safety
25 switch," yes.



1 Q. And if you look at line number 4 in the
2 middle paragraph, it says: (Reading)

3 There can also be a separate
4 safety switch, which upon being moved
5 into position, readies the panic
6 button to contact 911 upon being
7 pressed.

8 Did I read that correctly?

9 A. You did.

10 Q. So '353 application notes that the
11 safety switch can be moved from one position to
12 another, right?

13 MR. REIDY: Objection, form.

14 THE WITNESS: Well, it says "being
15 moved into position."

16 BY MS. MISBAH:

17 Q. So you agree that it can be moved into
18 a position, right?

19 MR. REIDY: Objection, form.

20 THE WITNESS: Well, the sentence says
21 it can be moved into position. It doesn't
22 say from one position to another.

23 BY MS. MISBAH:

24 Q. So you agree that the safety switch can
25 be moved into position, correct?



1 A. That's what it says, yes.

2 Q. And that sentence notes that when it is
3 moved into position, the safety switch has a
4 corresponding effect on the panic button, right?

5 MR. REIDY: Objection, form.

6 THE WITNESS: This -- the paragraph --
7 or the sentence says: (Reading)

8 There can be a separate safety
9 switch, which upon being moved into
10 position, readies the panic button.

11 So yes, the separate switch can be moved
12 into a position that readies the panic button.

13 BY MS. MISBAH:

14 Q. And this paragraph notes that the
15 separate switch being moved into position readies
16 the panic button to call 911 when pressed, right?

17 MR. REIDY: Objection, form.

18 THE WITNESS: The separate switch, when
19 it's moved into position, readies the panic
20 button to contact 911 upon being pressed.

21 That is exactly what it says.

22 BY MS. MISBAH:

23 Q. You agree that when the safety switch
24 is moved into position, the panic button doesn't
25 contact 911, based on what's written in this



1 paragraph, right?

2 MR. REIDY: Objection, form.

3 THE WITNESS: When the separate safety
4 switch is moved into position, it does not
5 yet contact 911, that's correct.

6 BY MS. MISBAH:

7 Q. It only contacts 911 when the panic
8 button is pressed, right?

9 MR. REIDY: Objection, form.

10 THE WITNESS: If the separate safety
11 switch has been moved into position, then the
12 panic button can be used to contact 911 when
13 it's pressed.

14 BY MS. MISBAH:

15 Q. You agree that when the safety switch
16 is not in position, there's no indication that
17 pressing the panic button results in 911 being
18 called, right?

19 MR. REIDY: Objection, form.

20 THE WITNESS: Well, the sentence says:
21 (Reading)

22 There can be a separate safety
23 switch, which upon being moved into
24 position, readies the panic button to
25 contact 911 upon being pressed.



1 So that is discussing an embodiment. It
2 does not appear to exclude a situation in
3 which there is no safety switch and you would
4 just press the panic button.

5 BY MS. MISBAH:

6 Q. I understand that. But focusing just
7 on this specific embodiment that is being discussed
8 in this paragraph on page 23, you agree that based
9 on this paragraph, pressing the panic button when
10 the safety switch is not in position likely does
11 not result in 911 being contacted, correct?

12 MR. REIDY: Objection, form.

13 THE WITNESS: Well, I'd actually -- it
14 doesn't say what happens if you press the
15 panic button and the safety switch has not
16 been moved into position. So it doesn't --
17 it doesn't specify that condition. It just
18 says that it readies the panic button.

19 BY MS. MISBAH:

20 Q. So you do agree that when the panic
21 button is readied by moving the safety switch into
22 position, and only then, when you press the panic
23 button, 911 is contacted?

24 MR. REIDY: Objection, form.

25 THE WITNESS: Well, at least when you

1 put the safety switch in position, the panic
2 button is -- is readied to contact 911. That
3 sentence is silent on what happens if you
4 press the panic button without moving the
5 safety switch into position.

6 BY MS. MISBAH:

7 Q. So just going back to moving the safety
8 switch into position, do you agree that when it is
9 in position, the panic button is ready to contact
10 911 when pressed, correct?

11 MR. REIDY: Objection, form.

12 THE WITNESS: When a separate safety
13 switch is moved into position, the panic
14 button is ready to contact 911.

15 BY MS. MISBAH:

16 Q. So for Ground 1 in the 114 IPR, you
17 rely on two references, the DiPerna964 and the
18 Strack reference, correct?

19 A. Can you repeat that, what paragraph?

20 Q. My apologies. I'm talking about the
21 114 IPR.

22 A. Yeah.

23 Q. This will be page 32 of your
24 declaration, which is Exhibit 1.

25 A. Okay. I've got page 32.



1 Q. And it says -- under Subheading B, it
2 says, "Ground 1: DiPerna964 in combination with
3 Strack renders obvious Claims 1 through 8"?

4 A. Yes.

5 Q. So you rely on DiPerna964 and Strack as
6 the two references for this ground, right?

7 A. Yes.

8 Q. And the Strack reference has a priority
9 date of July 26, 2016?

10 MR. REIDY: Objection, form.

11 THE WITNESS: Can you -- did you say
12 July 26, 2016?

13 BY MS. MISBAH:

14 Q. That's correct.

15 A. Yeah, that's the filing date on Strack.

16 Q. I'm going to share an exhibit. This
17 will be Exhibit 5.

18 (Exhibit Number 5 was marked for identification.)

19 BY MS. MISBAH:

20 Q. Please let me know when you have it.

21 A. I have it.

22 Q. Exhibit 5 is the Strack reference,
23 correct?

24 A. Yes.

25 Q. This is a fair and accurate copy of the



1 patent that you looked at in coming to your
2 conclusions?

3 MR. REIDY: Objection, form.

4 THE WITNESS: It looks like it, yes.

5 BY MS. MISBAH:

6 Q. And if you look at the parenthetical
7 paragraph, 22, on the cover, it says Strack was
8 filed on July 26, 2016, correct?

9 A. Yes, correct.

10 Q. It doesn't provide any related
11 applications to Strack, right?

12 MR. REIDY: Objection, form.

13 THE WITNESS: I don't see any listed.

14 BY MS. MISBAH:

15 Q. So based on the filing date, it is your
16 understanding that the priority date of the Strack
17 reference is July 26, 2016?

18 A. Yes.

19 Q. Dr. Michalson, you agree that Strack
20 would not be prior art to the '404 Patent if the
21 '404 Patent is found to have a priority date of
22 January 19, 2005, correct?

23 MR. REIDY: Objection, form.

24 THE WITNESS: If the '404 Patent is
25 found for this -- for the claims that I'm



1 analyzing, if it's -- if the DiPerna patent
2 is found to have the earlier priority date,
3 then Strack would not be prior art.

4 BY MS. MISBAH:

5 Q. So you agree that Ground 1 of your
6 declaration to the 114 IPR would not apply if
7 Claims 1 through 8 of the '404 Patent are found to
8 have a priority date of January 19, 2005?

9 MR. REIDY: Objection, form.

10 THE WITNESS: I think that would be
11 correct.

12 BY MS. MISBAH:

13 Q. Let's turn to your declaration for the
14 113 IPR.

15 A. Okay.

16 Q. I'd like to direct your attention to
17 Paragraph 107.

18 A. Okay.

19 Q. So in this paragraph, you're discussing
20 the Walker and Kim combination, right?

21 MR. REIDY: Objection, form.

22 BY MS. MISBAH:

23 Q. And if it's helpful, this starts on
24 page 29 of your declaration, which is Exhibit 2,
25 where you talked about the specific grounds for the



1 challenge.

2 (Witness reviews document.)

3 A. Yes, Paragraph 107 is part of that
4 section on Ground 1A.

5 Q. And this section is discussing the
6 Walker and Kim combination, correct?

7 A. That's correct.

8 Q. And so in Paragraph 107, Dr. Michalson,
9 you agree that Walker teaches a, quote, dedicated
10 button with a panic function, unquote, right?

11 MR. REIDY: Objection, form.

12 THE WITNESS: That Walker does teach --
13 Walker calls it an "eyewitness button," but
14 it does teach a dedicated panic button, yes.

15 (Exhibit Number 6 was marked for identification.)

16 BY MS. MISBAH:

17 Q. I've shared into the shared exhibits
18 Exhibit Number 6. If you could take a look at
19 that.

20 A. Okay. I have it.

21 Q. And this is the Walker reference,
22 correct?

23 A. Yes.

24 Q. This is a fair and accurate copy of the
25 reference that you analyzed in coming to your



1 conclusions?

2 A. Yes, it looks like it is.

3 Q. I'd like to direct your attention to
4 Paragraph 81 of this reference, which is page 20.

5 A. Okay. Paragraph 81. I have it.

6 Q. So Paragraph 81 discusses the
7 "preferred embodiment" of the Walker reference,
8 right?

9 MR. REIDY: Objection, form.

10 THE WITNESS: It refers to the
11 preferred embodiment of the handheld mobile
12 communication device.

13 BY MS. MISBAH:

14 Q. And it then goes on in the next
15 paragraph, Paragraph 82, to list all the various
16 components of the preferred embodiment of the
17 handheld mobile communications device; is that
18 right?

19 MR. REIDY: Objection, form.

20 THE WITNESS: Paragraph 82 seems to
21 enumerate a number of features of the Walker
22 device.

23 BY MS. MISBAH:

24 Q. And if you look at the third line,
25 starting on page 21, it notes the "recessed



1 eyewitness button," correct?

2 A. Yeah, it refers to recessed eyewitness
3 button 12, correct.

4 Q. And this is the button that you're
5 referring to when you talk about the dedicated
6 panic button in Walker, correct?

7 A. That's correct.

8 Q. And if you go down to Paragraph 83,
9 which is the next paragraph, Walker notes that:
10 (Reading)

11 The eyewitness button is
12 recessed and set to operate at a
13 higher finger pressure than other
14 buttons so as to minimize the
15 occurrence of accidental activation.

16 Right?

17 A. Yes.

18 Q. So turning to the Kim reference,
19 Dr. Michalson, I'm going to share Exhibit 7. Just
20 give me one second.

21 (Exhibit Number 7 was marked for identification.)

22 BY MS. MISBAH:

23 Q. Please let me know when you have it.

24 A. I have it.

25 Q. So Exhibit 7 is the Kim reference,



1 correct?

2 A. Yes.

3 Q. This is a fair and accurate copy of the
4 reference that you analyzed in coming to your
5 conclusions in the 113 IPR?

6 A. Yes, I believe it is.

7 Q. Let's go to page 9 of the Kim
8 reference.

9 A. Page 9 of the reference or page 9 of
10 the PDF?

11 Q. I was wondering the same thing. It
12 would be page 9 of the reference, not of the PDF.

13 A. Okay.

14 Q. If you look at the first full paragraph
15 on page 9 of the reference, it also notes a button
16 that can be used in order to release an emergency
17 mode, correct?

18 MR. REIDY: Objection, form.

19 THE WITNESS: Can you repeat your
20 question, please?

21 BY MS. MISBAH:

22 Q. Of course.

23 If you look at the first full paragraph
24 on page 9 of the Kim reference, it notes that a key
25 button can be used to release an emergency mode,



1 correct?

2 MR. REIDY: Objection, form.

3 THE WITNESS: Well, it refers to a
4 number key button 30c, as in Charlie, for
5 inputting a predetermined secret number in
6 order to release an emergency mode.

7 Is that what you're referring to?

8 BY MS. MISBAH:

9 Q. That's correct.

10 A. Okay. I see that.

11 Q. And this is -- and this emergency key
12 button is what you refer to in Paragraph 113 --
13 sorry, Paragraph 111 of Exhibit 2, which is your
14 declaration?

15 MR. REIDY: Objection, form.

16 THE WITNESS: I do refer to button 30c
17 in the paragraph that's on the top of my
18 page 78 of my declaration, but that's not
19 what I'm referring to as the emergency key
20 button or the dedicated panic button.

21 BY MS. MISBAH:

22 Q. What are you referring to, then, as the
23 dedicated panic button in Kim?

24 A. That's the bolded section of that
25 paragraph. I'm referring to the emergency key



1 button 32 that's mounted on the external lateral
2 surface of the handset.

3 Q. And in reference -- so let's turn back
4 to Exhibit 7, which is Kim.

5 A. Uh-huh. That's the exhibit I have
6 here, yes.

7 Q. Let's go down to page 13 of the
8 reference.

9 A. Okay.

10 Q. And if you look at the first full
11 paragraph on page 13 around lines 4 to 5, it talks
12 about the emergency key button, right?

13 A. I see a section says: (Reading)

14 If the related emergency key
15 button 32 is manipulated a plurality
16 of times, for example, three times,
17 within a set period of time.

18 I see that language.

19 Q. And this is the emergency key button
20 that you are analyzing in your declaration?

21 A. That's what I'm referring to as the
22 "dedicated panic button."

23 Q. And you know the functionality here on
24 page 13 of Kim, it says: (Reading)

25 The emergency key button is



1 manipulated a plurality of times,
2 example, three times, within a set
3 period of time.

4 MR. REIDY: Objection, form.

5 THE WITNESS: In this particular
6 embodiment, that button would be manipulated
7 a plurality of times.

8 BY MS. MISBAH:

9 Q. And it is your opinion that this
10 functionality that's being discussed, which is
11 manipulating the button a plurality of times,
12 prevents the accidental activation of the emergency
13 feature, right?

14 MR. REIDY: Objection, form.

15 THE WITNESS: I don't know if I would
16 use the word "prevent." It minimizes
17 accidentally raising an alarm.

18 BY MS. MISBAH:

19 Q. So you agree --

20 A. It reduces the probability of a false
21 alarm.

22 Q. So you agree that manipulating this
23 button a plurality of times reduces the probability
24 of accidental activation?

25 A. That would be a purpose in Kim, yes.



1 Q. Would you agree with me that Kim does
2 not teach this preventing -- you know, reducing the
3 probability of activation as a reason why the
4 emergency key (technical interruption) a plurality
5 of times, right?

6 MR. REIDY: Objection, form.

7 THE WITNESS: I disagree with you.

8 BY MS. MISBAH:

9 Q. Where in Kim do you see -- can you
10 point me to where in Kim it teaches that pressing
11 the button a plurality of times reduces the risk of
12 accidental activation?

13 A. It's using language like: (Reading)

14 It should be apparent that if
15 the emergency mode may be allowed to
16 be executed if the related emergency
17 key button is manipulated a plurality
18 of times . . .

19 That would be -- that clearly would be
20 motivated by a desire to reduce false alarms.
21 False alarms were well-known in the art. So I
22 think a person of skill in the art reading this
23 would understand immediately why you might want to
24 do that.

25 Q. So you agree that Kim does not

1 expressly note why you would incorporate pressing
2 this button a plurality of times?

3 MR. REIDY: Objection, form.

4 THE WITNESS: I think Kim clearly would
5 be describing that to a person of skill in
6 the art. It's the main reason why you would
7 do that, and it was well-known to do that
8 sort of thing, to reduce false alarms. So I
9 think Kim does communicate it, for sure.

10 BY MS. MISBAH:

11 Q. I understand -- I understand that,
12 Dr. Michalson. But my question was, Kim does not
13 expressly state within its -- you know, in the
14 reference that this feature prevents accidental
15 activation of the emergency mode, right?

16 MR. REIDY: Objection, form.

17 THE WITNESS: Well, the reference is
18 talking to a person of skill in the art. So
19 I would say, yes, it does. If you're asking
20 me, you know, is that specific set of words
21 in the patent explicitly? It does not
22 specifically state the reason, but it
23 wouldn't be necessary to. It would be so
24 obvious to a person of skill in the art that
25 I believe Kim does communicate that concept



1 very clearly.

2 BY MS. MISBAH:

3 Q. So you agree that Kim does not
4 expressly communicate this concept in words?

5 MR. REIDY: Objection, form.

6 THE WITNESS: Those specific words
7 don't appear in this paragraph in Kim, but I
8 think that concept is being clearly expressed
9 in Kim.

10 BY MS. MISBAH:

11 Q. I'd like to turn your attention back to
12 Exhibit 2, which is your declaration in the
13 113 IPR.

14 A. Okay.

15 Q. Could you take a look at Paragraph 119,
16 please?

17 A. Okay.

18 Q. And the first sentence of
19 Paragraph 119, you do state that: (Reading)

20 Kim does not expressly
21 describe that the purpose of requiring
22 the user to manipulate or press the
23 emergency key button a plurality of
24 times within a set period was for the
25 purpose of reducing accidental or

1 false activations.

2 Right?

3 A. Yeah, that's what I've been saying.

4 Q. Let's turn back to Walker,
5 Dr. Michalson. So this would be Exhibit 6. Let me
6 know when you have it in front of you.

7 A. Okay.

8 Q. So if you turn to Paragraph 96 of
9 Walker, which is page 24 of the exhibit.

10 A. Okay.

11 Q. So if you look at this paragraph, it
12 says that the handheld device 1 in Walker
13 communicates with a data storage facility, right?

14 MR. REIDY: Objection, form.

15 THE WITNESS: You're talking about the
16 first line of Paragraph 97?

17 BY MS. MISBAH:

18 Q. That's right.

19 A. Yes.

20 Q. And if you go down to the fifth line of
21 the same paragraph, it says: (Reading)

22 The data storage facility 7
23 creates a unique electronic file to
24 hold all data recorded during the call
25 into this unique file.



1 Right?

2 A. That's what it says, yes.

3 Q. And if you go down a little bit
4 further, it says -- this would be the second line
5 or the third line after the one I just read. It
6 says: (Reading)

7 A database link between each
8 file and the device owner's identity
9 or account is made, enabling the
10 device owner and the data storage
11 facility to look up and access files
12 in the future.

13 Right?

14 A. That's what it says, yes.

15 Q. So let's turn to Paragraph 101 of
16 Walker.

17 So if you look at Paragraph 101, it
18 discusses the process that is triggered when the
19 eyewitness button is pressed in on the device
20 disclosed by Walker. And if you look at the last
21 sentence, it says that data is transmitted to the
22 data storage facility.

23 Do you see that?

24 A. You're talking about the last sentence,
25 "As the transmission of video and sound and other



1 data continues, hybrid A-GPS data are regularly
2 updated and transmitted to the data storage
3 facility 7"?

4 Q. That's correct.

5 A. That's what it says, yes.

6 Q. As this paragraph discusses that when
7 the panic button is pressed, various collections of
8 data are transmitted to the data storage facility,
9 right?

10 MR. REIDY: Objection, form.

11 THE WITNESS: The general concept is
12 that when you press that panic button, it's
13 transmitting data to a data storage facility.

14 BY MS. MISBAH:

15 Q. And if you look at the fourth sentence
16 it says: (Reading)

17 The coordinates are
18 immediately transmitted to the data
19 storage facility, integrated with the
20 continuing video stream, sound data,
21 and other data.

22 Do you see that?

23 A. I do not. Where are you reading?

24 Q. This is Paragraph 101. This is the
25 middle of line 4.



1 A. (Reading)

2 The coordinates are
3 immediately transmitted to the data
4 storage facility.

5 I see that.

6 Q. So what this paragraph says is, when
7 the eyewitness button is pressed, the coordinates,
8 which is referring to the location coordinates of
9 the user, as well as video and sound data are
10 transmitted to the data storage facility?

11 MR. REIDY: Objection, form.

12 THE WITNESS: That's what it seems to
13 be saying.

14 BY MS. MISBAH:

15 Q. And nowhere in this paragraph does it
16 say any identification information on the owner is
17 transmitted to the data storage facility, right?

18 MR. REIDY: Objection, form.

19 THE WITNESS: Well, there has to be
20 identification of the user to establish the
21 link, in the first place, to the files in the
22 data storage facility. In this -- as we saw
23 in earlier paragraphs. In this particular
24 paragraph, it doesn't reiterate that, but the
25 fact that it's updating and transmitting data



1 to the data storage facility would mean it
2 would be transmitting it to the files that
3 were previously linked to the user.

4 BY MS. MISBAH:

5 Q. That's right. But this paragraph is
6 talking specifically about what happens when the
7 eyewitness button is pressed, right?

8 MR. REIDY: Objection, form.

9 THE WITNESS: That certain data items
10 are transmitted to the data storage facility
11 and would be stored in the file that was
12 previously linked to the user. Yes, that's
13 what it's communicating.

14 BY MS. MISBAH:

15 Q. Right. But this is -- when the panic
16 button -- or the eyewitness button is pressed, it's
17 noting the specific data that's being transmitted,
18 and that specific data is limited to the
19 coordinates denoting the user's location, the video
20 data, and the sound data, correct?

21 MR. REIDY: Objection, form.

22 THE WITNESS: That's some of -- that's
23 some of the data that is being transmitted to
24 the previously created files on the -- in the
25 data storage facility, yes.



1 BY MS. MISBAH:

2 Q. Dr. Michalson, let's turn back to your
3 declaration, which is Exhibit 2.

4 MR. REIDY: Counsel, can we take a
5 break at the next good opportunity?

6 MS. MISBAH: Actually, I'm just going
7 to start the next section so this is a great
8 time to take a break.

9 (Recess taken from 10:21 a.m. to 10:32 a.m.)

10 BY MS. MISBAH:

11 Q. Hi, again, Dr. Michalson. Did you
12 speak to counsel at all during the break?

13 A. Not about anything related to the
14 deposition.

15 Q. Okay.

16 All right. Let's turn back to
17 Exhibit 2, which is your declaration for the
18 113 IPR.

19 A. Okay.

20 Q. And I'd like to direct your attention
21 to page 200.

22 A. Okay.

23 Q. So page 200, you start discussing
24 Ground 4A, which is Martin in combination with Kim;
25 is that right?



1 A. That's correct.

2 Q. And this is regarding Claims 9, 10, and
3 then 12 through 14, correct?

4 A. Yes.

5 Q. So if you look at the next page, which
6 is page 201, you have two block quotes. I would
7 like to look at the second block quote, which is
8 discussing sensing device 160.

9 A. I see that.

10 Q. I've uploaded Exhibit 8 to the share
11 folder. Could you, please, open Exhibit 8?
12 (Exhibit Number 8 was marked for identification.)

13 THE WITNESS: Okay.

14 BY MS. MISBAH:

15 Q. You see Exhibit 8 is US Patent
16 6,839,552?

17 A. Yes.

18 Q. This is the Martin reference, correct?

19 A. Correct.

20 Q. And this is the reference that you
21 relied on in Grounds 4 of the 113 declaration?

22 A. Yes, that's correct.

23 Q. This is a fair and accurate copy of the
24 reference that you looked at?

25 A. It appears to be, yes.



1 Q. I'd like to turn to page -- so Column 5
2 of this reference, which would be page 9.

3 A. Okay.

4 Q. And if you look at lines 30 -- around
5 line 39, it talks about the sensing device.

6 A. You're talking about the paragraph
7 beginning in step 320?

8 Q. That's right.

9 A. Okay. I see that.

10 Q. And this is the sensing device that you
11 refer to in your declaration, right?

12 MR. REIDY: Objection, form.

13 THE WITNESS: I do refer to sensing
14 device 160.

15 BY MS. MISBAH:

16 Q. And so sensing device 160, if you look
17 at the next line, it says: (Reading)

18 Sensing device 160 may be one
19 of several instruments.

20 Right?

21 A. Yes.

22 Q. And in the line before, it says:
23 (Reading)

24 Content surrounding wireless
25 device, device 100, can be captured by



1 sensing device 160.

2 A. I'm not sure where you're reading that.

3 Q. Sorry. I'm on line 39, the line right
4 before the one we just read.

5 A. Yeah.

6 Q. It says: (Reading)
7 Contents surrounding the
8 wireless device 100 can be captured by
9 sensing device 160.

10 A. Yes.

11 Q. And then it goes on to say: (Reading)
12 The sensing device, for
13 example, can be -- a microphone may be
14 used as a sensing device to capture
15 sound as the content.

16 Do you see that?

17 A. Correct.

18 Q. And then it says: (Reading)
19 If the content comprises
20 images, the appropriate sensing device
21 would be a camera.

22 Correct?

23 A. Correct.

24 Q. And then it goes on to say at the very
25 last sentence of this paragraph: (Reading)

1 The content can be transmitted
2 to a called party 200 in step 322.

3 Correct?

4 A. (Reading)

5 To called party 200 in step
6 322.

7 Yes.

8 Q. So if you go up -- it's in the same
9 column. If you go up to the first full paragraph,
10 which starts at line 4. Do you see that?

11 A. Yes.

12 Q. Step 312.

13 A. Yes.

14 Q. It says: (Reading)

15 Initial location information
16 can be generated by at least one
17 location system, which may be one or
18 more of location systems 180, 280, and
19 380.

20 Right?

21 A. That's what it says, yes.

22 Q. And if you look at the very last
23 sentence of that same paragraph, it says:

24 (Reading)

25 The initial location



1 information is preferably provided to
2 party as soon as it is generated.

3 Do you see that?

4 A. (Reading)

5 Preferably provided to called
6 party 200 as soon as it is generated.

7 Yes, I see that.

8 Q. And then if you look at the third
9 paragraph, which starts at line 22, it says:
10 (Reading)

11 In step 318, subsequent
12 location information can be generated
13 by one or more of location systems.

14 Do you see that?

15 A. Yes.

16 Q. And if you look at the very last
17 sentence of that same paragraph, it says:
18 (Reading)

19 The subsequent location
20 information is preferably provided to
21 called party as soon as it is
22 generated.

23 Do you see that?

24 A. Yes.

25 Q. So you agree that in both the initial



1 location information and the subsequent location
2 information, the Martin reference teaches that this
3 information is provided to a called party as soon
4 as it is generated, correct?

5 MR. REIDY: Objection, form.

6 THE WITNESS: Yeah, it's describing
7 periodically updating location information.

8 BY MS. MISBAH:

9 Q. And it does note that this location
10 information is provided to a called party as soon
11 as it is generated, right?

12 MR. REIDY: Objection, form.

13 THE WITNESS: Typically, location
14 systems will generate position updates or
15 location updates at some rate, whether that
16 be every second, every few seconds, whatever.
17 So whenever the positioning system has a new
18 position to provide, this embodiment is
19 suggesting it would be transmitted once it's
20 available.

21 BY MS. MISBAH:

22 Q. So you agree that this embodiment is
23 teaching that this information is transmitted as
24 soon as it is available, right?

25 MR. REIDY: Objection, form.



1 THE WITNESS: It doesn't suggest to me
2 that it would -- it would interrupt some
3 other data transmission that's going on, but
4 it would -- it would be at whatever the next
5 available time to be able to transmit it
6 would be so that you can get periodic updates
7 of position.

8 BY MS. MISBAH:

9 Q. Dr. Michalson, my question is limited
10 to the Martin reference and the paragraphs that we
11 just looked at. And you agree with me that these
12 paragraphs note that the location information is
13 preferably provided to a called party as soon as it
14 is generated, right?

15 MR. REIDY: Objection, form.

16 THE WITNESS: The sentence says that it
17 is preferably provided to a called party as
18 soon as it is generated, and -- and so, yes,
19 your question "as soon as it is generated,"
20 those words are there, but I'm trying to
21 explain to you what a POSITA would derive
22 from that information.

23 BY MS. MISBAH:

24 Q. I understand that that's your -- that's
25 what you're trying to do, but my question is



1 limited to the four corners of this paragraph,
2 which says "as soon as it is generated." Is that
3 right?

4 A. Well, the four corners of this
5 paragraph are read in view of a person of skill in
6 the art, so you can't separate those two things.

7 Q. I understand that. But then based on
8 your understanding, this paragraph notes to a
9 POSITA that the location information is preferably
10 provided to the called party as soon as it is
11 generated, right?

12 A. The words say that it's preferably
13 provided to a called party as soon as it's
14 generated.

15 Q. You agree.

16 So if you go back, Dr. Michalson, to
17 the sensor device that we were looking at, so this
18 is the paragraph starting from lines 38, which
19 starts with "In step 320."

20 A. I see that.

21 Q. Do you agree with me that this
22 paragraph doesn't say that the content that is
23 generated by the sensing device is provided to the
24 called party as soon as it is generated, correct?

25 MR. REIDY: Objection, form.



1 THE WITNESS: Those words don't appear
2 in this paragraph.

3 THE CERTIFIED STENOGRAPHER: Counsel,
4 back at line 10, I did not hear an audible
5 answer.

6 MS. MISBAH: I can ask a quick question
7 just to clean the record up, but I appreciate
8 you pointing that out.

9 BY MS. MISBAH:

10 Q. I think my question was, Dr. Michalson,
11 you agree that this paragraph, and by "this
12 paragraph," I mean the paragraph discussing the
13 location information, notes that the location
14 information is preferably provided to a called
15 party as soon as it is generated, right?

16 MR. REIDY: Objection, form.

17 THE WITNESS: And I think I've said a
18 number of times that those words are in that
19 paragraph.

20 BY MS. MISBAH:

21 Q. And you agree that those words are not
22 in the paragraph discussing the content that is
23 captured by the sensing device, correct?

24 MR. REIDY: Object to the form.

25 THE WITNESS: Those words are not in



1 that paragraph. But what's described in the
2 paragraph, starting in step 320, are much
3 larger data structures that would have to be
4 collected and then transmitted. So it's a
5 different size and rate of data collection
6 than the previous paragraph.

7 BY MS. MISBAH:

8 Q. And how does the size and rate of data
9 collection affect the transmission of the data?

10 A. Well, it would not make sense to
11 transmit video from an owner's device until you
12 collected the video, right, or until the image was
13 collected. You're not going to transmit the first
14 line of an image and then collect the rest of the
15 lines. You're going to transmit it once you have
16 the image. So the data sizes, when we start
17 talking about audio data and image data and video
18 data, you're talking about things that are tens of
19 thousands or hundreds of thousands or millions of
20 bytes, whereas location data could be 232-bit
21 words.

22 Q. That makes sense.

23 And going up, I'd like to direct your
24 attention to Figure 3 of the Martin reference.
25 It's page 4 of Exhibit 8.



1 A. Okay.

2 Q. Do you see a flow chart represented in
3 this figure?

4 A. Yes.

5 Q. And if you look at the column or the
6 flow on the left at step 312, it says: (Reading)

7 Generate initial location
8 information.

9 Do you see that?

10 A. Yes.

11 Q. And then if you look at the next, which
12 is step 314, it says: (Reading)

13 Provide the initial location
14 information.

15 Do you see that?

16 A. Yes.

17 Q. And then if you look at step 320, it
18 says "capture content."

19 Do you see that?

20 A. Yes.

21 Q. And then the next step says: (Reading)
22 Transmit the content to the

23 called party.

24 That's 322. Do you see that?

25 A. Yes.



1 Q. Do you agree with me that the initial
2 location information, based on this flow chart, is
3 generated before any content is captured, based on
4 this flow chart, right?

5 MR. REIDY: Objection, form.

6 THE WITNESS: Based on this flow chart,
7 the generation of initial location
8 information occurs prior to capturing
9 content, but this is being done at computer
10 speeds. So whether or not you can perceive
11 that delay would be a different question.

12 BY MS. MISBAH:

13 Q. And you agree that the initial location
14 information is also provided before the content
15 capture step, right?

16 A. In step 314, that box happens before
17 box 320.

18 Q. And you agree that the transmission of
19 the content to the called party, which is box 322,
20 also takes place after the initial location
21 information is provided, which is in box 314,
22 correct?

23 MR. REIDY: Objection, form.

24 THE WITNESS: It's not clear just from
25 this figure whether -- or when it says



1 "provide initial location information," that
2 could be being transmitted. I don't recall.
3 Let me look up in the specification.

4 (Witness reviews document.)

5 THE WITNESS: Yeah, in Column 5 at
6 line 10, it says: (Reading)

7 In step 314, the initial
8 location information can be provided
9 to a called party during the wireless
10 communications session.

11 So it's entirely possible that it's --
12 well, in fact, if you look at 314 in context
13 of 316, they're certainly transmitting the
14 location information at that point. Then
15 they're continuing to keep the communication
16 session open, generating subsequent
17 information, capturing content, transmitting
18 content. So this is all part of a
19 communication session.

20 BY MS. MISBAH:

21 Q. I understand. So as part of this
22 communication session, you agree that data is being
23 transmitted sequentially as the communication
24 session is open?

25 MR. REIDY: Objection, form.



1 THE WITNESS: Well, I mean, we're
2 talking about a single communications path.
3 So by definition, it would be sequentially
4 being transmitted through that path. But
5 you've opened a communication system, so all
6 the data that is being transferred in that
7 session is being transferred
8 contemporaneously.

9 BY MS. MISBAH:

10 Q. Do you see any language in Column 5 or
11 in the spec which says that all of this data is
12 being transmitted contemporaneously?

13 A. Well, this is a -- this is a scenario
14 in which you're capturing information that's being
15 reported to a third party in the event of an
16 emergency, so it has to be being transmitted
17 contemporaneously in the flow of that emergency.
18 So these -- these boxes in this flow chart are
19 occurring at computer speeds, so they'd only be
20 throttled by the bandwidth of that communication
21 session.

22 Q. But you do agree that the flow chart
23 does show a step by step rather than sequential
24 flow of how content is being transmitted, correct?

25 MR. REIDY: Objection, form.



1 THE WITNESS: This example is showing
2 an embodiment where things are done in a
3 particular order as part of a single
4 communication session.

5 MS. MISBAH: Thank you, Dr. Michalson.
6 I have no other questions for you today.

7 THE WITNESS: Okay.

8 MR. REIDY: Counsel, can we take a
9 short break and I'll evaluate whether I have
10 any redirect?

11 (Recess taken from 10:53 a.m. to 10:59 a.m.)

12 MR. REIDY: Counsel, we have no
13 questions on redirect for Dr. Michalson.

14 MS. MISBAH: Thank you, Dr. Michalson,
15 for your time.

16 THE WITNESS: Thank you.

17 (Discussion held off the record.)

18 (Signature reserved.)

19 (Deposition concluded at 11:00 a.m.)

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1 CHANGES AND SIGNATURE Page 1 of 2

2 Witness Name: William Michalson, Ph.D.

3 July 30th, 2024

4 Page Line Change Reason

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1 CHANGES AND SIGNATURE Page 2 of 2

2 Witness Name: William Michalson, Ph.D.

3 July 30th, 2024

4 Page Line Change Reason

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18 I, William Michalson, Ph.D., have read the
 19 foregoing deposition and hereby affix my signature
 20 that same is true and correct, except as noted above.

21 -----

William Michalson, Ph.D.

22

Sworn to and Subscribed before me

23 -----, Notary Public.

24 This ----- day of -----, 20-----.

25 My Commission Expires:



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CERTIFICATE OF NOTARY PUBLIC

I, Amy A. Brauser, RPR RMR CRR, the officer before whom the foregoing deposition was taken, do hereby certify that the witness was duly sworn by me prior to the taking of the foregoing deposition; that the testimony of said witness was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

This is the 15th day of August, 2024.

Amy A. Brauser-----

Amy A. Brauser, RPR RMR CRR

Notary Public

for the Commonwealth of Virginia

Notary Registration No.: 7675529

My Commission Expires: January 31, 2028





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