

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4 META PLATFORMS, INC.,
5 Petitioner,

6 v.
7 MOBILE DATA TECHNOLOGIES LLC,
Patent Owner.

8 IPR2024-00246
9 Patent 8,793,336 B2

10 IPR2024-00247
11 Patent 8,825,801 B2

12 IPR2024-00248
13 Patent 9,032,039 B2

14 IPR2024-00249
15 Patent 9,619,578 B2

16 IPR2024-00250
17 Patent 9,922,348 B2

18 DEPOSITION OF DR. NENAD MEDVIDOVIC

19 Conducted Virtually
20 Monday, December 23, 2024
9:10 A.M.

21 Job No.: 565558

Pages: 1-94

22 Reported by: Crystal Hereford, RPR

1 Videotaped deposition of DR. NENAD

2 MEDVIDOVIC, conducted virtually.

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6 Pursuant to notice, before CRYSTAL HEREFORD,

7 Registered Professional Reporter, Certificate No. 30819,

8 and California Certified Reporter, Certificate

9 No. 14416.

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A P P E A R A N C E S

ON BEHALF OF PETITIONER:

MARK R. WEINSTEIN, ESQ.

ANDREW C. MACE, ESQ.

COOLEY LLP

3175 Hanover Street

Palo Alto, California 94304

650.843.5808

ON BEHALF OF PATENT OWNER:

JAYME PARTRIDGE, ESQ.

PATRICK DUNN, ESQ.

BROWN RUDNICK LLP

811 Main Street, Suite 1825

Houston, Texas 77002

281.815.0511

ALSO PRESENT:

SHAGAW MEKONEN, A/V Technician, Planet Depos

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C O N T E N T S

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E X H I B I T S

(Previously marked, not attached.)

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1 P R O C E E D I N G S

2 THE REPORTER: We will go on the record.

3 Will counsel please announce your appearance,
4 starting with the taking attorney.

5 MR. WEINSTEIN: This is Mark Weinstein from
6 the law firm of Cooley LLP, representing the petitioner.

7 MS. PARTRIDGE: Jayme Partridge from
8 Brown Rudnick, representing MDT.

9 I also have Pat Dunn with me from Brown
10 Rudnick.

11 MR. WEINSTEIN: And I apologize. I neglected
12 to mention Andrew Mace, who is back-up counsel for
13 Petitioner, is also attending the Zoom deposition.

14 DR. NENAD MEDVIDOVIC,
15 a witness herein, having been first duly sworn by the
16 certified reporter to speak the truth and nothing but
17 the truth, was examined and testified as follows:

18 EXAMINATION

19 BY MR. WEINSTEIN:

20 Q. Good morning, sir.

21 A. Good morning.

22 Q. Could you state your name for the record?

1 A. Nenad Medvidovic.

2 Q. And, sir, you submitted a declaration in
3 connection with this IPR proceeding, correct?

4 A. That is correct.

5 Q. And that declaration has been marked or
6 entered as Exhibit 2007, correct?

7 A. That is my understanding.

8 Q. And I understand that you have a copy of that
9 declaration that you can refer to during this
10 deposition, correct?

11 A. Correct.

12 Q. Sir, have you been deposed before?

13 A. I have.

14 Q. Approximately how many times?

15 A. Over a hundred certainly. I don't know how
16 many exactly.

17 Q. Okay. So certainly you're familiar with the
18 process of sitting for a deposition, correct?

19 A. Correct.

20 Q. Are you taking any medication that could
21 affect the testimony you're giving here today?

22 A. No.

1 Q. Can you identify any reason why you can't
2 give your best and most accurate testimony here today?

3 A. No.

4 Q. Sir, in connection with your IPR declaration,
5 Exhibit 2007, when is the last time you had an
6 opportunity to review that declaration?

7 A. Yesterday.

8 Q. Okay. And without going into any
9 communications you may have had with counsel, generally
10 speaking, what did you do to prepare yourself for
11 today's deposition?

12 A. I looked at the patents that are at issue
13 here. I looked at the declaration, once again, just to
14 refresh my memory. I looked at the alleged prior art
15 references. And I briefly met with counsel sometime
16 last week.

17 Q. Okay. Sir, if you could turn to paragraph 6
18 of your declaration, which is Exhibit 2007.

19 And I'm just going to let you know that we're
20 going to be referring throughout the deposition today to
21 portions of your declaration, Exhibit 2007. Some
22 lawyers try to restrain witnesses just to the portions

1 they're asking about. I'm just going to let you know.
2 If you need to refer to other portions of your
3 declaration to answer a question that I'm asking, you
4 can go ahead and do that. Does that make sense?

5 A. That's fine. Yes.

6 Q. So just a quick housekeeping question on
7 paragraph 6. You mentioned you're being compensated for
8 your work in this matter. That's correct, right?

9 A. That is correct.

10 Q. What is the hourly rate at which you're being
11 compensated?

12 A. It is \$750.

13 Q. And approximately how many hours do you
14 estimate that you have spent working on this matter?

15 A. Since the beginning?

16 Q. Yes, sir.

17 A. I would not be able to tell you.

18 Q. Okay. You wouldn't even be able to give me a
19 ballpark?

20 A. No, not really. I apologize, but it's not
21 something that I looked at.

22 Q. Okay.

1 A. I mean, it's -- you know, it's been some --
2 not a trivial amount of time, because it's five patents,
3 and there was a fair bit of stuff to do. But yeah, I
4 couldn't give you an exact time.

5 Q. So I'll represent to you that when the case
6 was first started, the patent owner's preliminary
7 response -- they relied on a different expert for the
8 preliminary response. Approximately when did you start
9 working on the IPR matter here?

10 MS. PARTRIDGE: Objection; foundation.

11 A. A few months ago, but, again, I couldn't give
12 you an exact date.

13 Q. Okay. Your declaration is signed August 1st.
14 Does that help you refresh your recollection at all?

15 A. I'm sorry. You said August 1st?

16 Q. I'm sorry. October 1st. I apologize.

17 A. Yeah. So a number of weeks before
18 October 1st, but I couldn't give you an exact date.

19 Q. Okay. So I'm going to jump forward, sir, to
20 paragraph 34 of your declaration, which is on pages 20
21 and 21 of Exhibit 2007.

22 A. Sorry. Just to make sure, paragraph 46?

1 Q. 34.

2 MS. PARTRIDGE: Objection; form.

3 Do you mean pages 15 and 16?

4 MR. WEINSTEIN: Yeah. I'm trying to figure
5 out the best way to identify this. Every page has a
6 page number, and then the declaration has paragraphs.
7 The paragraph I'm referring to is paragraph 34. It
8 begins on page 20 of Exhibit 2007.

9 MS. PARTRIDGE: And you're using -- I see --
10 the page -- there's actually different page numbers as
11 well, so that's why I was a little confused. I see what
12 you're doing.

13 Q. So on the bottom of each page, there's a
14 page number that says "page XX of 182." I want to make
15 sure we're looking at the same document.

16 A. Thank you both for clarifying that. I think
17 we're going to be on the same page. No pun intended. I
18 think I know now what you're referring to. I'm there.

19 Q. Okay. So in paragraph 34, I just wanted to
20 ask a quick question.

21 Are you assuming a priority date of June 18,
22 2002, for the patents at issue here?

1 A. As I say in that paragraph, I understand from
2 counsel and from the face of each of the challenged
3 patents that the date on which the provisional patent
4 application was filed was June 18, 2022, and I've been
5 asked to explain the state of the art relevant in
6 2020- -- sorry -- 2002. I apologize. Not 2022. That's
7 a big difference -- and I've been asked to opine on the
8 state of the art as it existed back in 2002.

9 Q. Okay. So you're familiar with the concept of
10 a priority date as it relates to patents, correct?

11 A. Yes, I am.

12 Q. For purposes of your opinions, are you
13 assuming the priority date is June 18, 2002?

14 MS. PARTRIDGE: Objection; asked and
15 answered.

16 A. As I already said, that is the date that the
17 provisional patent was submitted at, and that's the date
18 that I am going with as the appropriate date to analyze
19 the art.

20 Q. Okay.

21 A. So that would be the priority date.

22 Q. Thank you.

1 In paragraph 36, you are referencing a 1990s
2 product known as the IBM Simon Personal Communicator.
3 Do you see that?

4 A. Yes.

5 Q. Had you ever used that device?

6 A. Not in the context of this case.

7 Q. Okay. As of June 2002, if you can recall,
8 what types of mobile devices had you personally used?

9 MS. PARTRIDGE: Objection; form.

10 A. By that point I had used the Apple Newton, a
11 couple of the generations of the PalmPilots, and then
12 several of the -- what they at that time called
13 Pocket PCs, such as the Compaq iPAQ. There were a
14 couple of other ones that were also compatible devices,
15 I think one made by HP and -- I forget -- maybe one made
16 by -- I want to say Xerox, for example.

17 But my research at that time was heavily
18 involved with trying to enable component-based
19 distributed software development over small footprint
20 devices, and my research lab had a variety of those that
21 we had been using along with a variety of other
22 auxiliary equipment like RFID tags, sensors, Wi-Fi --

1 and so forth.

2 Q. Understood. Let me go through them one by
3 one.

4 Obviously, the Apple Newton, that is a device
5 that was discontinued at some point in the 1990s,
6 correct?

7 A. That sounds about right. I did not look up
8 the exact history or the lifespan of the Newton, but
9 after a while it wasn't available to the public.

10 Q. Okay. The other category you mentioned was
11 PalmPilots. But June 2002, those were commercially
12 available, correct?

13 A. Yes. They were available in the very late
14 1990s, if I remember. The Palm -- specifically, the
15 device of interest to me was the PalmPilot Vx, because
16 that was the first one on which you could run a version
17 of the Java Runtime Environment.

18 Q. And the Vx, is that a product that was
19 available prior to June 2002, to the best of your
20 recollection?

21 A. I believe that is correct.

22 Q. Okay. The PalmPilot products that you used,

1 were they capable of connecting to, for example, the
2 internet?

3 MS. PARTRIDGE: Objection; form.

4 A. Not in the way or in the sense that we would
5 consider a person of ordinary skill in the art assuming
6 connecting to the internet to mean. They were not
7 equipped with networking capability, so there were extra
8 things you had to do to make that happen. And that was
9 part of my lab's research, but it required purchasing
10 additional equipment.

11 Q. Any additional add-on hardware for the
12 PalmPilot?

13 A. Yes. Specifically at that time -- this was
14 over 20 years ago, so you could probably remember what
15 the world of computing was like back in those days. We
16 ended up looking for -- because PalmPilots had a serial
17 port. We ended up looking for devices that would allow
18 us to connect the Palm through the serial port to a
19 network, found something online that -- it was before
20 Amazon and any of the conveniences we have today.

21 But anyway, it was shipped in from China at
22 that time, and we were able to rig a connection of a

1 bunch of them where they could directly be connected
2 with one another, exchange information back and forth
3 for the purpose of an application we were at that time
4 building for the U.S. Department of Defense, and then
5 also go online to download certain types of very -- in a
6 very limited way, certain types of information, again,
7 in connection with a particular troop's deployment
8 scenario that we were supporting.

9 Q. Did the PalmPilots that you used have web
10 browsers on them?

11 MS. PARTRIDGE: Objection; form.

12 A. The PalmPilots did not have web browsers.

13 Q. Okay. The other category of device you
14 mentioned was Pocket PCs, and you mentioned one example
15 was the Compaq, I believe, iPAQ. Is that an example of
16 one?

17 A. Correct. There were probably multiple
18 generations of that device, and I couldn't tell you as
19 we sit here which one or ones we were using at the time,
20 but the iPAQ was one of the devices with which we worked
21 extensively.

22 Q. Do you recall the operating system that the

1 Pocket PCs used at the time?

2 A. I believe they were running Windows CE.

3 Q. Okay. In connection with the mobile devices
4 that you used, had you ever heard of a technology known
5 as a springboard module? Does that sound familiar?

6 A. As we sit here, that does not ring a bell,
7 but it doesn't mean that I may not have heard and just
8 forgot about it.

9 Q. Understood.

10 In paragraph 40 of your declaration, if you
11 could turn to that -- that's on page 23 -- you mention
12 that the 3G network was introduced in 2001, and you go
13 on and say "That advance marked the beginning of
14 widespread use of the internet on mobile telephones."
15 Do you see that?

16 A. Yes.

17 Q. Before 3G, there was 2G, right?

18 A. 2G and EDGE.

19 Q. Had you ever heard of a wireless networking
20 technology known as GSM?

21 A. Yes.

22 Q. And did GSM exist prior to June 2002?

1 A. I have not looked that up in connection to
2 today, so I cannot definitively opine on the history of
3 GSM.

4 Q. What was GSM, as you can recall?

5 A. It was a wireless protocol, but not one that
6 I've used extensively. So I will just leave it at that.

7 Q. Okay. And then was GSM a 2G technology?

8 A. I would not be able to tell you as we sit
9 here.

10 Q. Understood.

11 Had you ever heard of a technology known as
12 GPRS?

13 A. Yes. That also rings a bell.

14 Q. What was GPRS, as far as you can recall?

15 A. Again, it was a protocol of some sort, but
16 it's not something that I looked at in connection with
17 the case.

18 Q. Understood.

19 And then 3G network. Do you recall what the
20 data transfer rate was for 3G as of 2001?

21 A. I may have that in my declaration, in fact,
22 because I did look up those rates in connection with

1 this case.

2 Q. All right. And then you also mentioned a
3 network that -- I think you said was available as 2G.
4 It's called EDGE, E-D-G-E?

5 A. Correct.

6 Q. What was EDGE?

7 A. EDGE was just a kind of cellular network
8 that, I believe, existed at that time. Again, these are
9 all kind of proto networks when most of the things that
10 people did with their phones were sending simple SMS
11 messages and making phone calls.

12 Q. Was EDGE a digital network? In other words,
13 it was capable of sending and receiving digital data?

14 MS. PARTRIDGE: Objection; form.

15 A. I believe that may have been the case, but I
16 have not looked back at it in connection with preparing
17 for today.

18 Q. Okay. GSM and GPRS, do you recall if those
19 were digital networks?

20 A. It is possible that they were digital
21 networks, but, again, with capacities that did not make
22 them relevant for my preparation for today.

1 Q. Okay. And 3G, was that a digital network?
2 Or was that --

3 A. Yes.

4 Q. Withdrawn.

5 Was 3G a network capable of transmitting and
6 receiving digital data?

7 A. Yes. It was capable of transmitting and
8 receiving digital data in a manner that, at some point
9 past 2001 -- so a couple years past 2001 -- made it
10 possible to do some slightly more, let's say, fun things
11 with our mobile devices.

12 Q. So was 3G actually available in 2001 in the
13 United States?

14 A. All I looked up is that it was introduced in
15 2001, because I was trying to establish the appropriate
16 time frames. My guess is that it was rolled out in a
17 limited, piecemeal fashion, kind of like the way 5G was.
18 But what the rollout process looked like, I have not
19 studied that. I was really more interested in the
20 capacities involved because of what is actually at issue
21 in this case.

22 Q. Understood, sir.

1 Let's move on to paragraph 42, if you could.
2 That's on the same page, page 23 of your declaration.

3 And you refer to "Internet usage over mobile
4 devices was essentially one way." I just want to
5 understand and explore your views on what that means.

6 You go on, on the top of page 24, to say
7 "These webpage versions were essentially one-way
8 communications. They had limited, if any, bidirectional
9 interaction capabilities such as those that mobile
10 devices can access at the present time." Do you see
11 that?

12 A. Yes, I see that.

13 Q. Let me just sort of break down what you mean
14 by "essentially one way."

15 The mobile versions of webpages that were
16 available prior to June 2002, you would agree that users
17 were able to interact with those webpages, correct?

18 MS. PARTRIDGE: Objection; form.

19 A. In a very rudimentary way users were always
20 able to, quote/unquote, interact with servers that
21 contained the web content, because in HTTP, the
22 interaction is initiated by making a request from within

1 a browser.

2 Q. Understood.

3 So users would have been able to, for
4 example, select what content they wanted to view, and
5 the server would deliver that content to them, correct?

6 MS. PARTRIDGE: Objection; foundation.

7 A. I think the way you're characterizing that
8 is -- it makes it sound like it's a much more
9 end point-type of interaction than what was actually
10 available. Users were able to click on a link, and
11 whatever the content was that -- to colloquially put
12 it -- hides behind that link, the server would deliver
13 that content. I don't think that it's appropriate in
14 that context to really say that that meant that the
15 users decided what content they wanted to view beyond
16 just the page being delivered to them, whatever was on
17 that page.

18 Q. Were users able to, for example, provide text
19 input to the website using a mobile device prior to
20 June 2002?

21 MS. PARTRIDGE: Objection; form.

22 A. I do not recall explicitly whether that was

1 possible within protocols such as WAP, which was used
2 widely, but it is possible that some specific and very
3 basic data was sharable by a user accessing a client to
4 a website.

5 What I can tell you is that in that time
6 frame my lab specifically worked on federally funded
7 projects for which we got non-trivial amounts of money
8 to make it, in fact, possible for users of mobile
9 devices to be able to interact with servers in a more
10 fluid way. So just going back and thinking about how
11 the funding process typically works, I doubt that the US
12 government would have given me -- whatever it was --
13 half a million dollars in the 2000, 2001 time frame to
14 develop such a capability if it already had existed.

15 Q. So in paragraph 42, you say "These
16 webpage versions were essentially one-way
17 communications. They had limited, if any, bidirectional
18 interaction capabilities such as those that mobile
19 devices can access at the present time."

20 What bidirectional interaction capabilities
21 did mobile devices have with mobile webpages prior to
22 2002, if any?

1 A. Well, as we already discussed, they were
2 in -- as of 2002, as a user of a mobile web browser, you
3 were able to click on a link. And that is a kind of
4 interaction that went from your client to wherever
5 the -- either the web server or some sort of proxy may
6 have kept that particular webpage. So that is
7 interaction that went one direction, and then the
8 content delivered from the server would be interaction
9 going in the other direction. So it is a very
10 rudimentary example of bidirectional interaction.

11 Q. Okay. So we covered the user can click a
12 link. What else could they have done in terms of
13 bidirectional interaction beyond clicking a link prior
14 to June 2002?

15 MS. PARTRIDGE: Objection; form.

16 A. Not much. So I think you already alluded to
17 the fact that it may have been possible to enter some
18 simple textual data as a parameter to a request. I have
19 not gone back and analyzed that, but I'll just take your
20 representation for it. But that's about it, as far as I
21 know.

22 Again, these were very capacity-limited

1 networks. It was incredibly hard to get anything of
2 consequence done. And as I already said in my report, I
3 talk about the severely limited capacities that were in
4 the low hundreds of kilobits per second for 2G and early
5 3G versions.

6 Q. So is your memory that at about that time the
7 data rate of existing cellular networks was around the
8 low hundreds of kilobits per second?

9 A. Well --

10 MS. PARTRIDGE: Objection; form.

11 A. -- I don't have to go from memory, because,
12 as I already mentioned, I do talk about it in my
13 declaration. So it's somewhere almost midway through
14 the declaration I discuss -- paragraph 141.

15 Early versions of 3G, which were already
16 significantly more bandwidth enabled than 2G,
17 guaranteed, at most, 144 kilobits per second. And only
18 in 2002 and beyond did the required 3G+ protocol become
19 available. But even there, actually being able to
20 transmit video over wireless networks was a ways away.

21 Q. Thank you for pointing that out to me, sir.

22 And so in paragraph 141, are you saying that

1 3G provided for 144 kilobits per second and 3G+ was more
2 than that?

3 MS. PARTRIDGE: Objection; form.

4 A. 3G+ did provide capacity beyond 144 kilobits
5 per second.

6 Q. Understood.

7 And just so the record is clear, a kilobit
8 per second is a thousand bits per second, correct? Or
9 maybe --

10 A. That's correct.

11 Q. -- 1024, actually. I'm not actually sure.
12 Is it a thousand or 1024?

13 A. It's 1024. But yes. Either way, close
14 enough, right?

15 Q. So a kilobit is approximately 1024 bits per
16 second, correct?

17 A. That is correct.

18 Q. And then just to be clear, a bit is -- 8 bits
19 makes a byte, correct?

20 A. Correct.

21 Q. And a byte, for example, would be like an
22 ASCII character, correct?

1 A. That is correct.

2 Q. Okay.

3 A. So, in essence, if you have 100 kilobits --
4 or 144 kilobits per second, then you are, at most, able
5 to transfer something like 18 words -- sorry --
6 18 letters, 18 characters, per second. So that's a huge
7 capacity barrier right there.

8 Q. I think you may have the number wrong. For
9 144 kilobits --

10 A. Sorry. 18,000, right.

11 Q. Yeah.

12 A. Correct. I apologize. So 18,000 characters
13 per second.

14 But if you consider that -- especially before
15 some of the more modern compression techniques became
16 more widely used -- a typical photo is on the order of
17 multiple megabytes, that kind of gives you a sense of
18 how slow even just sending one picture across the
19 network would have been.

20 Q. Just so we're clear. So your testimony was
21 the 3G network that would have been available prior to
22 June 2002 could have delivered approximately

1 18,000 bytes per second approximately?

2 MS. PARTRIDGE: Objection; form.

3 A. So 144 kilobits per second is the exact
4 number, so whatever the division by 8 is. I've roughly
5 approximated it. So if we go with some rough estimate
6 of 18,000, I think that's fine for the purpose of our
7 discussion.

8 Q. Thank you, sir. So thank you for pointing me
9 to that paragraph of your declaration.

10 If you could go back to paragraph 43 of your
11 declaration. That's on page 24.

12 A. Okay.

13 Q. And you refer to Web 1.0. Do you see that?

14 A. I do.

15 Q. And you say in the first sentence "For
16 example, Web 1.0, which was in use until approximately
17 2004, was primarily a one-way, static-content hypertext
18 system." You go on and say "Using Web 1.0, websites
19 were primarily designed to be to provide information to
20 users without allowing users to interact beyond
21 requesting content to be displayed in the browser by
22 clicking a hyperlink." Do you see that?

1 A. I do.

2 There is a typo there that you did read, and
3 then there was a word -- or a couple of words that you
4 skipped over. So just for the record, it's "without
5 allowing users to engage or interact beyond requesting,"
6 et cetera. I don't think there's a material difference,
7 but just since you're reading directly from the
8 declaration.

9 Q. Thanks for pointing that out, sir.

10 And just -- this is a normal preliminary ask.
11 When you reviewed your declaration in preparation for
12 your deposition today, did you see anything you needed
13 to correct? Because I can obviously give you that
14 opportunity to do it here -- do so here, if you need to.

15 A. Nothing of consequence, nothing that would
16 materially affect my opinions. There are -- there is an
17 extra verb there, for example, an extra infinitive that
18 snuck in or was left accidentally, things like that.
19 But I don't think that there's any doubt as to what that
20 sentence means. So yeah.

21 Q. Correct. I just meant besides sort of
22 immaterial typographical errors that may or may not

1 appear in your declaration. Did you see anything in
2 your declaration that you want to revise, sitting here
3 today?

4 A. No.

5 Q. Okay. Going back to your description of
6 Web 1.0. So Web 1.0 websites -- you say "without
7 allowing users to engage or interact beyond requesting
8 content to be displayed in the browser by clicking on a
9 hyperlink."

10 But Web 1.0 sites could do more than that,
11 right?

12 MS. PARTRIDGE: Objection; foundation.

13 A. In a very rudimentary way. Full-blown
14 Web 1.0 websites did allow some other information to be
15 supplied by the user, but it was not anything that would
16 practically reflect the kinds of things that we rely on
17 today or, for that matter, the kinds of things that the
18 five patents in question in this case were teaching.

19 Q. Did Web 1.0 websites have the ability to
20 allow users to provide text information to the website?

21 MS. PARTRIDGE: Objection; foundation.

22 A. You were able to provide inputs of textual

1 nature to a website that would then be used for some
2 subsequent processing.

3 Q. Okay. Web 1.0 websites, were they also
4 capable of allowing users to upload files to those
5 websites?

6 MS. PARTRIDGE: Objection; foundation.

7 A. They were capable of uploading files through,
8 at the least, technologies that predated Web 1.0, such
9 as relying on the FTP protocol. So there were known
10 ways of doing that before the web came on the scene as a
11 widely used technology.

12 Q. And for the record, FTP refers to the file
13 transfer protocol, correct?

14 A. That is correct.

15 Q. Were there any other techniques that were
16 built into HTTP that would have allowed a user to upload
17 a file to a website over the internet?

18 A. I'm trying to think back to -- so that would
19 have been the era of HTTP/1.1. It was certainly
20 possible to send content that was not just a web
21 request, and that content could have been a static file.
22 I believe that HTTP/1.1 did support that.

1 Q. Was that through a facility called HTTP POST?
2 Does that sound familiar?

3 A. Yes. That was one of the --

4 MS. PARTRIDGE: Objection; form.

5 A. HTTP POST was one of, I think, eight commands
6 that 1.1 -- HTTP/1.1 supported.

7 Q. And did HTTP POST allow a web browser to send
8 a file to a server over the internet prior to June 2002?

9 MS. PARTRIDGE: Objection; form.

10 A. Yes. HTTP POST allowed a user to send
11 content, including a static file, from a desktop browser
12 to some storage facility that was associated with the
13 server.

14 Q. Understood.

15 And when you use the term "static file," just
16 so the record is clear, what do you mean by "static
17 file"?

18 A. What I mean by that is something that exists
19 somewhere in persistent storage on your device that you
20 can point to, so something that exists in a particular
21 directory on a hard drive that you can point to locally
22 so that your browser could take that location and start

1 transferring whatever is at the location to the server.

2 Q. Essentially a binary file that would be
3 stored on someone's hard drive, correct?

4 MS. PARTRIDGE: Objection; form.

5 A. I do have to admit that as we sit here I
6 don't -- I have not looked back at all the different
7 file formats that were supportable going across the
8 network using web browsers at the time. So this would
9 have been probably the era of the Netscape Navigator,
10 possibly toward the tail end of its extensive use, and
11 then the versions of Internet Explorer.

12 I think multiple different kinds of files
13 were sent across. How those files were encoded, yes,
14 they would have been encoded using some sort of -- they
15 would have been marshaled, essentially, using some sort
16 of probably binary encoding, and then un marshaled on
17 the far end. But the file itself may not have been
18 thought of necessarily as being binary in the sense that
19 we typically use it in computer science.

20 Q. Right. For example, you could send a text
21 file over the internet from a browser to a server using
22 HTTP prior to June 2002, correct?

1 MS. PARTRIDGE: Objection; form.

2 A. Yes. If I'm using Internet Explorer on my
3 computer, I could point to, let's say, a Java file -- if
4 I'm working on a program -- and send it across to some
5 kind of website for whatever reason.

6 Q. How about a JPEG image file?

7 MS. PARTRIDGE: Objection; form.

8 A. It was possible to upload JPEG images. The
9 speed of the upload would have been a factor that one
10 would consider, depending on how fast your network
11 connection was. And back in those days, if you were
12 using dial-up, for example, it doesn't matter how
13 powerful your computer locally was. Sending a JPEG
14 image could have taken a minute or two.

15 Q. Understood.

16 And the same answer for a GIF image, G-I-F?

17 MS. PARTRIDGE: Objection; form.

18 A. Yes. The same answer as I gave you for JPEG.
19 It's just another encoding of an image file. And if you
20 were using -- again, it's a static file, so how it's --
21 what it encodes, ultimately, was immaterial to the HTTP
22 protocol. It allowed you to point to a place on your

1 disk where that file lived and to transfer it bit by bit
2 to wherever it needed to go on a server.

3 Q. Understood.

4 You also mentioned dial-up modems, and I'm
5 old enough to remember dial-up modems from that time
6 period. Did those support a 56K data transfer rate,
7 56 kilobits-per-second transfer rate?

8 MS. PARTRIDGE: Objection; form.

9 A. That is one of the rates that I do recall.
10 It's possible that there were some variation in those
11 rates. It's also possible that that rate itself may not
12 have been guaranteed, depending on other factors. But,
13 again, it's not something I looked at in detail for
14 today.

15 Q. I understand.

16 But do you recall that dial-up modems had a
17 maximum throughput rate of approximately 56 kilobits per
18 second? Does that sound familiar to you?

19 MS. PARTRIDGE: Objection; asked and
20 answered.

21 A. As I already said, that vaguely rings a bell.
22 It's a very limited rate. So we talked a second ago

1 about 144 kilobits per second in early versions of 3G,
2 before 3G+ came on the scene, as being prohibitive for
3 many useful applications that we rely on today. So less
4 than half that would have been highly restrictive. And
5 all of us -- I mean, everybody who used dial-up
6 connections back in the day knows that that was the
7 case.

8 Q. Thank you, sir.

9 So before I get to the claim construction
10 discussion in your declaration, prior to your work on
11 this case, had you ever seen the patents-in-suit?

12 A. No.

13 Q. Had you ever heard of any of the inventors?
14 And they are -- withdrawn.

15 Prior to your work on this case, had you
16 heard of David Walker Harper, who is one of the
17 inventors listed on the patent?

18 A. I don't believe that I had.

19 Q. Jason James Sabella, had you heard of him
20 before?

21 A. I don't believe so.

22 Q. William Henry Munch, M-u-n-c-h, had you ever

1 heard of him before?

2 A. I don't think so either.

3 Q. And then Wireless Inc. corporation, had you
4 heard of them before your work on this case?

5 A. It's entirely possible that I had. You know,
6 Wireless Inc. sounds -- it's sort of like Mark Cuban's
7 Broadcast.com. Right? It's very -- so it's entirely
8 possible that I had.

9 Q. Right. Do you have any specific recollection
10 of any products or services that may have been offered
11 by a company called Wireless Inc.?

12 A. I do not.

13 Q. Okay. If you could turn to paragraph 54 of
14 your declaration. I just wanted to confirm that --
15 that's on pages 29 and 30 of your declaration,
16 Exhibit 2007.

17 I just want to confirm that you are not
18 disputing the POSITA definition offered by Petitioner.
19 Is that correct?

20 MS. PARTRIDGE: Objection; form.

21 A. I mean, I say "I was given the petitioner's
22 definition of a POSITA, and I agree with Petitioner's

1 definition." So I think the statement is pretty clear.

2 Q. Right. The reason I ask is because in the
3 previous paragraph, paragraph 53, you do offer a
4 definition of a POSITA. So I'm just trying to
5 understand for purposes of your opinion whether you're
6 adopting your own definition, the petitioner's
7 definition, or maybe you don't see a material difference
8 between them.

9 MS. PARTRIDGE: Objection; form.

10 A. There are -- I don't see the petitioner's
11 definition in front of me right now, but just going from
12 memory, any differences were -- A, I don't believe that
13 they were really material. But, B, I don't believe that
14 the petitioner's definition -- or adopting the
15 petitioner's definition would have impacted my opinions
16 in any way.

17 Q. Okay. Fair enough.

18 So let's go to paragraph 61 of your
19 declaration, which is page 32.

20 A. Okay.

21 Q. And then in paragraph 61, you say "The
22 specification of the challenged patents --

1 specifications of the challenged patents do not clearly
2 provide a definition of 'mobile device' different from
3 the plain and ordinary meaning. The specification
4 describes mobile device by stating: The term 'mobile
5 device,' as used herein, is intended to include, without
6 limitation, any type of portable information processing
7 device capable of being configured for communication
8 over a network." Do you see that, sir?

9 A. Yes.

10 Q. You're familiar with the concept in patent
11 law that when a patent provides an express definition of
12 a term, that that definition is controlling for purposes
13 of that patent, correct?

14 MS. PARTRIDGE: Objection; form. Objection;
15 calls for a legal conclusion.

16 A. I was just about to say. I'm not really a
17 lawyer, but if that's what you represent, we can go with
18 it.

19 Q. Well, I just -- well, let me step back.
20 How many patent cases have you testified in,
21 sir?

22 A. A large number, over 50 probably.

1 Q. Okay. So are you familiar with the
2 principle -- and maybe you're not -- that when a patent
3 provides an express definition of a term, that that's
4 the definition you have to use?

5 MS. PARTRIDGE: Objection; form.

6 A. That is putting it more in layperson's terms,
7 and I would not disagree with that. That is -- if there
8 is a definition of a term in a patent, that's the
9 definition one goes with for the purposes of
10 interpreting whatever the term is in that patent.

11 What happens very often in practice, or at
12 least not infrequently -- excuse me -- is that two sides
13 may disagree about whether something is an actual
14 expressed definition of a term or not. So those are the
15 kinds of debates that I have seen take place.

16 But if there is a clear definition -- so if a
17 patent were to say "Term XYZ is defined to mean" and
18 then it gives a definition, then there is no dispute.
19 That's the definition that term has.

20 Q. Do you believe that the patents-in-suit here
21 provide an express definition of "mobile device"?

22 MS. PARTRIDGE: Objection; form.

1 A. I don't have the patents in front of me. I
2 certainly know that they do not expressly say that
3 they're defining a mobile device. What they do is they
4 characterize mobile devices and provide a variety of
5 kinds of mobile devices that would -- that a person of
6 ordinary skill in the art would understand to be a
7 mobile device. And that is also the gist of what I talk
8 about, among other places in my declaration, in
9 paragraph 61.

10 Q. Okay. So in paragraph 64 of your
11 declaration -- that's on page 35 of Exhibit 2007 -- you
12 have what appears to be a block quote from the
13 '578 patent. I'll just read it into the record.

14 It says "Examples of mobile devices 15
15 utilizable in system 10 of Figure 1A include a mobile
16 telephone; a personal digital assistant, PDA; a palmtop
17 computer; a handheld computer; a laptop computer; a
18 tablet computer." Do you see that?

19 A. Yes.

20 Q. So the term "personal digital assistant," or
21 "PDA," what is your understanding of what a personal
22 digital assistant was prior to June 2002?

1 A. We already discussed one example of a PDA,
2 and that's the Compaq iPAQ. So those would have been
3 the Pocket PCs that were in use around that time frame.
4 They tended to run Windows CE, so the mobile version of
5 Microsoft Windows, and were small footprint devices that
6 basically you could put in your pocket and use for
7 whatever your specific needs are; compute, to store
8 notes, access the web in a very rudimentary way, and so
9 forth.

10 Q. Would a Pocket PC device, in your opinion,
11 qualify as a mobile device for purposes of the patents
12 as you've defined it?

13 MS. PARTRIDGE: Objection; form.

14 A. A Pocket PC, given that it's a PDA, would
15 qualify as a mobile device.

16 Q. Okay. Another example listed in this list is
17 a palmtop computer. Did you have an understanding of
18 what a palmtop computer referred to prior to June 2002?

19 A. I have a recollection of what those may have
20 looked like. And, again, we talked about at least one
21 that probably would fit the bill, which was the
22 PalmPilot.

1 Q. Okay. So would a PalmPilot be an example of
2 a device that would have qualified as a mobile device in
3 June 2002, as you understand the term?

4 MS. PARTRIDGE: Objection; form.

5 A. In the sense that the idea behind the device,
6 just like with a PDA, was that it went with you where
7 you went, kind of like what a mobile phone -- what you
8 do with a mobile phone today, I would -- a smartphone --
9 sorry. Because this list also has mobile phones, but
10 those were different generations of mobile phones.

11 So kind of like what one does with their
12 iPhone today, for example, that's -- that notion of
13 mobility is what you also had with a palmtop computer.
14 You could put it in your pocket and take it wherever you
15 went.

16 Q. And then it also refers to a laptop -- sorry.
17 We'll get to the laptop in a minute.

18 It also refers in this section quoted in
19 paragraph 64 to a tablet computer. What's your
20 understanding of what a tablet computer would have
21 looked like prior to June 2002?

22 A. It maybe would have been a tablet. Microsoft

1 had released one. I have not looked at the exact dates,
2 but it was known as a potential computing -- type of
3 computing platform back in the day. It wasn't widely
4 used. And, in fact, assuming that the dates match up --
5 it doesn't really matter one way or the other. But
6 Microsoft's attempt was a failure, because people at
7 that time were saying how you wouldn't want to use that.
8 You would either use a traditional computer, or you
9 would use a smaller footprint device.

10 So tablets were an attempt that took a few
11 more years to kind of germinate. And then when the
12 iPads were released, they kind of took hold. But it was
13 the same concept back in the relevant time frame.

14 Q. Going back to palmtop computers, did those
15 have keyboards?

16 A. They may have had either a -- so a PalmPilot,
17 for example, had the flap. I forget. It might have had
18 a keyboard on one of the sides of the flap, but they
19 might have also had electronic keyboards that would
20 display on the screen. And typically it would have a
21 stylus, et cetera.

22 So, again, I have not done an exhaustive

1 analysis of all kinds of devices that were available in
2 the June 2002 time frame, so this is just going from
3 memory. But I did not think that there was also a
4 dispute between the parties regarding these devices.

5 Q. Okay. Well, let me just close this out.

6 The palm devices that you can recall that
7 existed prior to June 2002, would those have qualified
8 as a mobile device under the definition that you've
9 proposed?

10 MS. PARTRIDGE: Objection; form.

11 A. So I'm not proposing -- just to be clear, I'm
12 not proposing a definition. I am basically using the
13 plain and ordinary meaning and also as informed by the
14 patents-in-suit. And palm devices, I think I already
15 mentioned, would have been -- they definitely fit in
16 one's pocket, so they would have qualified.

17 Q. Okay.

18 MS. PARTRIDGE: Mr. Weinstein, I know you're
19 on a long place here. I just -- in the next little
20 while, if we can take a break, that's great. But I
21 don't want to break up too much here for you.

22 MR. WEINSTEIN: Okay. This might be a good

1 time actually, to be honest with you. Do you want to
2 take a ten-minute break? Is that okay?

3 MS. PARTRIDGE: Yeah, that's great. Thank
4 you.

5 MR. WEINSTEIN: Is that okay with the
6 witness?

7 THE WITNESS: Yeah, yeah. Sure. Thank you.

8 MR. WEINSTEIN: Okay. Thank you.

9 THE REPORTER: Okay. We're off the record.

10 (Off the record: 10:09 a.m. to 10:23 a.m.)

11 THE REPORTER: We're back on the record.

12 Q. Welcome back, sir.

13 A. Thank you.

14 Q. If you could turn back, sir, to paragraph 59
15 of your declaration. That's on page 31.

16 A. Okay.

17 Q. Halfway in that paragraph, it says "In
18 addition, a POSITA would have understood mobile
19 information channel, as used in the challenged patents,
20 to refer to a component of a mobile site configured to
21 permit a wide variety of mobile devices to send and
22 receive content over a wireless network." Do you see

1 that?

2 A. Yes.

3 Q. That's your construction for "mobile
4 information channel" as used in the patents, correct?

5 MS. PARTRIDGE: Objection; form.

6 A. To be specific, that is my clarification to
7 the plain and ordinary meaning of "mobile information
8 channel."

9 So I think in a couple paragraphs before
10 that -- yes. I say that that is one of the terms that
11 should be given its meaning in accordance with the
12 ordinary and customary meaning as would have been
13 understood by a POSITA in light of the prosecution
14 history and the specification.

15 Q. So let me start with -- the term "mobile
16 information channel," is that a term that was known to
17 persons of skill in the art outside the context of this
18 patent prior to June 2002?

19 MS. PARTRIDGE: Objection; form.

20 A. It's not a term that would have been in
21 widespread use such as "client," "server," and such. So
22 it has to be looked at in the context of the -- it would

1 have to be looked at in the context of the patents that
2 are at issue here.

3 Q. Okay. Understood.

4 If you can go to paragraph 68 of your
5 declaration. That's on page 37.

6 A. Okay.

7 Q. You say "As I noted above, the mobile
8 information channel must enable messaging between the,
9 quote, wide variety, quote, mobile devices disclosed.
10 Such mobile devices include not only a laptop computer
11 but also a mobile telephone and a personal digital
12 assistant, PDA, among other devices." Do you see that?

13 A. Yes.

14 Q. So what I'm trying to understand, sir, is
15 when you use the term "wide variety," are you saying
16 that a mobile information channel has to be capable of
17 communicating with all of the types of exemplary mobile
18 devices listed in the patent specification?

19 MS. PARTRIDGE: Objection; form.

20 A. Well, the way the patent specification
21 describes it, it does not place restrictions on the
22 kinds of mobile devices to which the invention applies,

1 with one caveat, which is that the use of a laptop in
2 particular is something I talk about extensively in my
3 declaration, and it is something that should be read in
4 the context of the patents here.

5 So I'll leave it at that. There is extensive
6 discussion in -- and I'm sure we'll get to it -- in my
7 declaration about it.

8 Q. Sure. But if you go to paragraph 66 of your
9 declaration -- that's on the previous page -- you've
10 excerpted out the portion of the patent specification
11 that lists a number of exemplary mobile devices. Do you
12 see that?

13 A. Yes, I see that.

14 Q. And the excerpt of the patent you have
15 identified lists mobile telephone, a personal digital
16 assistant, palmtop computer. It goes on and even
17 includes a watch or timepiece, a camera, portable game
18 player. Do you see those?

19 A. Yes, I see that.

20 Q. So for something to qualify as a mobile
21 information channel, must it be capable of interacting
22 with all of those different categories of mobile devices

1 listed in the patent specification?

2 MS. PARTRIDGE: Objection; form.

3 A. The specification does not place any
4 restriction on the kinds of devices that can engage in
5 communicating over a mobile information channel. So in
6 other words, it doesn't say, for example, that handheld
7 computers can only talk to other handheld computers. A
8 handheld computer can talk to a mobile phone or a PDA.
9 So in that sense, the invention itself supports
10 interactions across the different -- using the mobile
11 information channel across these different types of
12 devices.

13 Q. I understand that, sir. What I'm referring
14 to, just to clarify my question, is your
15 interpretation if mobile information channel refers to a
16 wide variety of mobile devices.

17 My question, sir, is: To get a wide variety
18 of devices, how many different types of devices do you
19 have to have to meet your understanding of what a wide
20 variety is?

21 MS. PARTRIDGE: Objection; form.

22 A. I do not express an opinion about that, and I

1 don't believe that the patent itself defines what a wide
2 variety is. But there is a listing here, and one of
3 ordinary skill in the art would understand that any of
4 these devices, in principle, should be able to interact
5 with any of the other devices --

6 (Simultaneous speaking.)

7 Q. Understood.

8 To get to a wide variety, it's enough that it
9 could interact with two of the types of devices that are
10 listed here? Or does it need to be more than two of the
11 types of exemplary devices listed in the specification
12 to meet a wide variety?

13 MS. PARTRIDGE: Objection; asked and
14 answered.

15 A. I was just about to say. And I'm sure --
16 this is not a complaint, by the way, but I was in the
17 middle of clarifying my answer further.

18 We would have to look at the context of a
19 specific claim at issue here, because the claim defines
20 the invention. So discussing wide variety in this
21 context just means that the invention anticipates that
22 there would be, again, a wide variety of these kinds of

1 devices, as shown in this list. But as far as what
2 would be required to practice the invention, we would
3 have to look at the claims.

4 Q. Right. But looking at your construction --
5 so when you see a wide variety of mobile devices, are
6 you referring to a wide variety of different types of
7 mobile devices? Or just a number of mobile devices? Do
8 you understand the distinction?

9 MS. PARTRIDGE: Objection; asked --
10 objection; form.

11 A. Well, maybe you can explain to me what you
12 mean by "looking at my construction." I don't -- I'm
13 just providing a clarification in paragraph 68. I do
14 not -- that is not a construction of a mobile
15 information channel. I think that mobile information
16 channel is a component of a mobile site configured to
17 permit a wide variety of mobile devices to send and
18 receive content over a wireless network.

19 So it is -- it says it's configured to permit
20 a wide variety of mobile devices. It doesn't -- that
21 definition itself, it doesn't say that it actually
22 requires at any one point in time a wide variety of

1 mobile devices. So it's just enabled or configured to
2 permit, to allow, a wide variety of mobile devices to
3 send and receive content.

4 So I just don't want to read too much into
5 this wide variety out of context. In the context, I
6 think it's absolutely clear what this means.

7 Q. And I understand it's your clarification of
8 what you think the plain meaning is and not a
9 construction. And for purposes of my question, I'm not
10 sure that distinction is material.

11 I'm just trying to understand, as a person of
12 skill in the art reading the term "wide variety of
13 mobile devices," what requirement that imposes in terms
14 of how many different types of devices the system has to
15 be enabled to communicate with. Maybe not at the same
16 time, but using the system.

17 MS. PARTRIDGE: Objection; form. Objection;
18 asked and answered.

19 A. So I think that you -- just kind of the tail
20 end of your question, in fact, tied back to the
21 construction itself. Because being configured to permit
22 for something to happen and requiring that to happen are

1 two different things.

2 So being configured to permit, basically you
3 can think of it as there's a protocol that -- as long as
4 different mobile devices are capable of speaking that
5 protocol, the mobile information channel would be able
6 to accommodate that. In other words, the mobile
7 information channel itself does not -- is not
8 pre-configured with some set number of devices where it
9 says "Well, I can handle a palmtop and a Pocket PC, but
10 I can't handle a watch." That's literally all this
11 says. As long as mobile devices in question are able to
12 send and receive content over a wireless network, that
13 fits the definition of a component of a mobile site
14 configured to permit those devices to do so.

15 Q. So if we could turn back to paragraph 59.
16 I'll just focus on the exact language of your
17 understanding of what "mobile information channel"
18 refers to.

19 In paragraph 59, you use the term "a
20 component of a mobile site configured to permit a wide
21 variety of mobile devices to send and receive content
22 over a wireless network."

1 So if that component was only capable of
2 interacting with, for example, mobile telephones, would
3 that meet your understanding of what a mobile
4 information channel requires?

5 MS. PARTRIDGE: Objection; form.

6 A. Well, there are a wide variety of mobile
7 telephones. Right? At the least, there are a wide
8 variety of Android-based phones, and then as a different
9 category in today's market, there is the iPhone.

10 So if you -- you know, we can postulate other
11 scenarios where it's only capable of allowing -- I don't
12 know -- Samsung Galaxy 7s to talk to other Samsung
13 Galaxy 7s, or whatever. If we postulate that kind of
14 scenario, then we can, you know, debate whether or not
15 that would be a mobile information channel. But even
16 just mobile telephones alone are a wide variety of
17 devices.

18 Q. Understood. That's helpful.

19 And then are PDAs also -- withdrawn.

20 Would PDAs have also been an example of a
21 wide variety of mobile devices prior to June 2002?

22 MS. PARTRIDGE: Objection; form.

1 A. Again, I have not conducted an analysis or
2 spent too much time thinking about if I just restrict
3 this to one kind of thing. But as I already mentioned,
4 there were different kinds of PDAs available in that
5 time frame, so that would fall under -- potentially
6 under a wide variety of devices. There were probably
7 three or four different vendors who were competing in
8 the marketplace, and then each one of them had different
9 versions of their products. That is variety.

10 To the extent that it makes a difference
11 whether we're discussing potential infringement or
12 whether we're actually discussing potentially
13 invalidating the patents or whatever, then in those
14 contexts, I would be happy to consider the various
15 scenarios. But in the context of our discussion right
16 now, I'm comfortable with saying that potentially those
17 could -- that could be a wide variety.

18 Again, if you said Compaq iPAQ Version 1.1
19 running this particular configuration and that's the
20 only thing that it supports, then we could debate
21 whether that fits wide variety. But we're kind of --
22 this is sort of a disembodied discussion here, because

1 we're not looking at the patent spec, and we're not
2 talking about what specifically -- why this question
3 matters.

4 So for the purpose of my answer, I think if
5 we just restrict it even to one category of devices,
6 within that category, there is a wide variety.

7 Q. Understood. Okay.

8 Let's move to paragraph 74 of your
9 declaration, sir, which is the opinions relating to the
10 term "wireless network."

11 And you think, for purposes of the patent,
12 that the plain and ordinary meaning of "wireless
13 network" and the intrinsic record is, quote, a network
14 separate from the internet that facilitates connection
15 to the internet by a mobile device. Is that right?

16 A. Correct.

17 MS. PARTRIDGE: Objection --

18 THE WITNESS: Sorry. Sorry, Jayme.

19 A. That is what the last portion of the sentence
20 in paragraph 74 states.

21 Q. Prior to June 2002 -- just so I can
22 understand the contours of your opinions -- what would

1 be an example of something that would be a wireless
2 network as you understand the term to mean?

3 A. It would be any sort of network that allowed
4 you to connect to wirelessly and through which you could
5 presumably access a modem that itself was connected to
6 the internet. So some kind of a local wireless
7 configuration, for example, that might exist in an
8 office. I mean, there are lots and lots of examples.

9 So I'm not -- you know, as long as it's a
10 network that is not the internet itself with which you
11 can connect to the internet by a mobile device, it would
12 be -- in the context of this discussion, it would fit
13 the definition of a wireless network.

14 Q. Understood.

15 Would 3G be an example of a wireless network
16 as you understand that term?

17 MS. PARTRIDGE: Objection; form.

18 A. Depending on how it's used and what the
19 specifics of the configuration are, it may be a wireless
20 network as used in the patent.

21 Q. How about GSM?

22 MS. PARTRIDGE: Objection; asked and

1 answered.

2 A. I have not analyzed GSM in the context of
3 this case, and I have not opined on it. So I'm happy to
4 take a look at a spec or a summary of some sort and
5 opine on it further.

6 Q. Just so I understand, what do you mean by the
7 network is separate from the internet but still
8 facilitating connection to the internet?

9 A. Well, I'll give you an example of my setup at
10 home right now. I have a laptop that I am basically
11 using to dock with a larger monitor, and I don't have --
12 other than a connection to the monitor, I don't have any
13 network cable reaching all the way to the laptop. The
14 laptop itself is connecting to the wireless network I
15 have set up in my home. In turn, that wireless network
16 is connected through a portal, essentially, to the
17 internet.

18 So I could, for example, have my wireless
19 modem fully operational and disconnect my connection to
20 my ISP. I would have wireless throughout my home, but I
21 would not be able to use any -- I might be able to
22 collaboratively play a game, for example, with my son,

1 but I would not be able to go out on the internet.

2 So this is a network that is separate from
3 the internet, but it would have to also, to fit the
4 definition, facilitate connection to the internet by a
5 mobile device.

6 Q. Okay. Understood.

7 So is Wi-Fi an example of a wireless network
8 under your understanding of that term?

9 MS. PARTRIDGE: Objection; form.

10 A. Depending on the configuration that we're
11 discussing, Wi-Fi may be a wireless network. It is -- I
12 don't believe that it was discussed in the patents, and
13 I certainly do not talk about it in my -- in this
14 paragraph. I actually don't think I mention it at all.

15 But if configured properly, Wi-Fi could be an
16 example of a wireless network as long as it fits the
17 other elements of the definition as provided in my
18 declaration.

19 Q. Is "802.11" another phrase that refers to
20 Wi-Fi?

21 MS. PARTRIDGE: Objection; form.

22 A. I think that's the protocol spec. Yes.

1 Generally, 802.11 is what somebody might use when
2 they're referring to Wi-Fi, although not nearly as
3 frequently.

4 Q. Understood.

5 Then going to paragraph 77 of your
6 declaration. You're referring to the wireless
7 networking functionalities of the mobile device. You
8 refer to it as "functionality implementable by the
9 mobile device via the wireless network independent of
10 the internet." Do you see that?

11 A. Yes.

12 Q. And then in the next paragraph, 78, you're
13 block quoting a portion of the patent specific where it
14 refers to actions implementable over a wireless network.
15 Do you see that?

16 A. It actually discloses messaging actions -- or
17 a messaging action implementable over the wireless
18 network, and it's one of three different things that it
19 discloses in...

20 Q. Right. I'm just referring to the first
21 sentence in paragraph 78. "In the specification, the
22 term 'wireless networking functionalities' is disclosed

1 to include actions implementable over a wireless network
2 independent of the internet." Do you see that?

3 A. Yes, I see that.

4 Q. So I'm trying to understand. Can you give me
5 an example so I can understand your opinion of an action
6 that's implementable over a wireless network that's
7 independent of the internet?

8 MS. PARTRIDGE: Objection; form.

9 A. Well, I don't have the patents in front of
10 me. So we can maybe short-circuit this by looking at
11 a -- at one of the patents that are relevant here, and
12 I'd have to see which -- in this particular case which
13 patent it is referencing, because we kind of jumped into
14 it.

15 Q. Yeah. If you need to refer to a patent, you
16 can go ahead and do that. I haven't made one an
17 exhibit, but I believe it's a common specification. So
18 if you want to just refer to the '336 patent, that would
19 be fine if you need to refer to that to answer the
20 question.

21 A. Yeah. I would like to do that, just because
22 we're -- so this is referencing 5, lines 51 through 65.

1 Q. Do you have a copy of the '336 patent? Or do
2 you need me to provide it to you?

3 A. No, I'm okay. Thank you.

4 Examples of such information include
5 information specifying at least one messaging action
6 implementable over the wireless network, information
7 specifying at least one collaboration action, and
8 information specifying at least one location-based
9 service.

10 Well, this was actually helpful also to
11 clarify that this is not a conjunction, because I'm only
12 quoting an excerpt in paragraph 78. It's three separate
13 examples. So it could be any one of these three.

14 Q. Understood.

15 So the question I'm getting at, sir, is
16 that -- obviously, you know, there are things you can do
17 in terms of messaging actions and collaboration actions
18 that might be implemented over the internet. I'm trying
19 to understand. Is there a concrete example of messaging
20 or collaboration action that one can take via a wireless
21 network independently of the internet?

22 MS. PARTRIDGE: Objection; form.

1 A. Well, it says -- so I'm looking at, for
2 example, the '578 spec in Column 6, line 47. "For
3 example, the site could be used to generate messages
4 using instant messaging, IM, SMS, MMS, pages, emails,
5 VoIP calls, cellular telephone calls, or any other
6 suitable messaging format that are sent to
7 organizational members over the wireless network."

8 So depending on the kinds of things that you
9 may configure your device to be able to support, you may
10 be able to communicate directly over a wireless network
11 that is independent of the internet itself. So I could
12 imagine a scenario where sending such messages does not
13 necessitate kicking you out of the internet, but you
14 could do it internally in house, so to speak, because
15 everybody is using the mobile information channel.

16 But, again, it's just a scenario. You know,
17 I think that having a wireless network separate from the
18 internet is something that is clearly taught by these
19 patents. We could probably postulate a bunch of
20 different scenarios along the lines of what I just
21 described.

22 Q. Okay. Let's move to paragraph 89. This

1 might help us a little bit. I think there's a more
2 detailed description in here. In 89, you have the OSI
3 seven-layer architecture listed here as well. That's on
4 pages 47 and 48 of your declaration.

5 A. Okay.

6 Q. On the bottom of page 47, you say "By
7 contrast, the internet functionalities built on top of
8 the TCP/IP protocol residing at the OSI standard network
9 architecture's transport layer" --

10 THE COURT REPORTER: Can you slow down for
11 the court reporter, please. Thank you.

12 MR. WEINSTEIN: Sure.

13 Q. So I'll withdraw the question.

14 On the bottom of page 47 and the top of 48,
15 you refer to a few technologies here, web, email, SMS,
16 MMS, and online collaboration, e.g., VoIP. Do you see
17 that?

18 A. Yes, I do.

19 Q. Are these examples of technologies that do
20 use the internet in order to function?

21 MS. PARTRIDGE: Objection; form.

22 A. In the context of a particular scenario where

1 you are connected over the internet and relying on
2 TCP/IP, the answer to your question would be yes. But
3 this is a very specific scenario and a very specific
4 configuration. This is talking specifically about
5 something that is layered on top of the transport layer
6 and using the internet.

7 Q. Right. These are application layer
8 functionalities in your view?

9 MS. PARTRIDGE: Objection; form.

10 A. They are application layer functionalities
11 specifically layered on top of the TCP/IP transport
12 layer.

13 Q. Okay. And then I'll just go through these
14 just so the record is clear.

15 You have web, which you said is primarily
16 HTTP protocol. And do you say "primarily" because it
17 also uses other internet protocols like TCP/IP?

18 MS. PARTRIDGE: Objection; form.

19 A. I mean, the web could also use FTP, for
20 example. It could use whatever streaming protocols you
21 end up relying on through your browser. In fact, that
22 happens commonly.

1 But, you know, the web -- the primary
2 protocol of the web is HTTP, but there is nothing that
3 precludes us from, for example, agreeing that another
4 protocol would still constitute the web. It's just a
5 standard.

6 Q. Right. And then email, you say "primarily
7 SMTP protocol." Does that refer to the simple mail
8 transfer protocol?

9 A. Yes. That's a protocol that's typically used
10 to transfer emails.

11 Q. Is it used to transfer emails over the
12 internet?

13 MS. PARTRIDGE: Objection; form.

14 A. It may be used to transfer emails over the
15 internet.

16 Q. Well, let's be honest. It is used to
17 transfer emails over the internet, correct?

18 MS. PARTRIDGE: Objection; form.

19 A. Typically it is used, but there's nothing in
20 the protocol that prevents it from transferring it over
21 an intranet, for example. You and I could agree that
22 we're going to have an intranet -- in fact, there are

1 organizations with which I've worked where they strictly
2 control emails that go between the members of the
3 organization and emails that go between the outside
4 world and the inside of the organization. There are
5 many scenarios that distinguish between -- make a
6 distinction between the two. SMTP is agnostic as to
7 that setup.

8 Q. Sure. I can grant you that assumption.

9 But you would agree that prior to June 2002
10 SMTP was commonly used to send and receive email
11 messages over the internet, correct?

12 MS. PARTRIDGE: Objection; form.

13 A. I'll agree with that even today. It is
14 commonly used to send email messages over the internet.
15 What I'm saying is that that's not the only use.

16 Q. Of course. I understand.

17 You go on and say "messaging facilities,
18 e.g., SMS, MMS protocols."

19 Does MMS use the internet in order to
20 function?

21 MS. PARTRIDGE: Objection; form.

22 A. Again, it's a protocol. As long as it --

1 whatever is using the MMS implementation satisfies the
2 standard that defines the protocol, MMS itself is
3 agnostic as to the specific scenario within which it's
4 used. Most often it's used via the internet, but that's
5 not the -- again, the protocol itself doesn't care one
6 way or the other, really.

7 Q. Okay. And then VoIP you mention as an
8 example of online collaboration. That's voice over
9 internet protocol, correct?

10 A. Correct.

11 Q. And so as its name implies, VoIP is sending
12 voice over internet protocol, correct?

13 A. That's what the name stands for. Again, it's
14 a protocol that makes certain assumptions about what
15 would exist, and generally it's used over the internet.
16 But configurations of this are just as equally possible
17 over some sort of an intranet.

18 Q. If you could turn to page 98 -- I'm sorry. I
19 apologize. I got the page number wrong --
20 paragraph 103, which is on page 57.

21 A. Okay.

22 Q. And on paragraph 103, you have an excerpt

1 from the Neibauer reference that is entitled "My PDA."

2 Do you see that?

3 A. I do.

4 Q. And on the top, you see that there are three,
5 what appear to be, mobile device screenshots. Is that
6 right?

7 A. Let me look at the -- there are three
8 screenshots. I cannot read them in my printout, so I'm
9 just going to go to the electronic version and zoom in a
10 little bit, if you don't mind.

11 Q. No problem at all.

12 A. These are -- yes. These are three
13 screenshots from -- that Yahoo says come from,
14 quote/unquote, Your PDA.

15 Q. And then in the middle screenshot, do you see
16 that it says a ticker symbol and has a text box?

17 A. I see that.

18 Q. This, to you, indicates that the user of the
19 mobile device would have been allowed to enter text in
20 the form of a ticker symbol in order to pull up the
21 price of that particular stock, right?

22 MS. PARTRIDGE: Objection; form.

1 A. Presumably. But, again, this is -- I talk
2 about it extensively in my declaration. We're talking
3 about three or four characters. This is not what the --
4 you know, there is -- in the next box there, somebody is
5 entering a five-digit ZIP code, for example. So these
6 are very rudimentary capabilities.

7 Q. If you could turn to page 58 and 59, around
8 paragraphs 105 and 106.

9 A. Okay.

10 Q. You show a Clubs page on paragraph 105 from
11 Neibauer and then a photo album page on paragraph 106.
12 In your view, would these have been, to use your
13 parlance, Web 1.0-type webpages?

14 MS. PARTRIDGE: Objection; form.

15 A. Well, given that Neibauer, as I remember it,
16 was published before 2004 and Web 2.0 is widely
17 acknowledged as coming on the scene in 2004, this would
18 have been Web 1.0 by that characterization or that
19 definition.

20 Q. Understood. Okay.

21 And just so the record is clear. Before your
22 work on this case, had you ever used any of the Neibauer

1 functionalities that are described in...

2 A. I did not. In fact, I didn't use it for the
3 very reasons that I state in the declaration in a couple
4 of places. Neibauer is so simplistic that a person of
5 ordinary skill in the art would not have looked at that
6 reference. That's the kind of reference that I would
7 have expected, you know, a non-technically savvy family
8 member to perhaps peruse.

9 Q. Right. I guess my question wasn't clear. I
10 was referring more to the functionalities.

11 Prior to your work on this case, had you ever
12 used, for example, the Yahoo Clubs functionality
13 described in Neibauer?

14 A. I did not.

15 Just also for the record, Yahoo Clubs is not
16 a mobile functionality. It's in a completely different
17 part of the system. So even in the context of my work
18 on enabling mobile access to a range of devices in that
19 time frame, that would not have been relevant to me.

20 Q. Okay. But the Yahoo functionalities
21 described in Neibauer, as I think you mentioned, those
22 are Web 1.0 functionalities, correct?

1 A. I mean, that's -- Web 1.0 was what was in
2 existence in the relevant time frame.

3 Q. If you could turn -- we'll jump forward a
4 little bit to paragraph 119 of your declaration, which
5 is on page 65. It refers to the Cheng reference.

6 A. I'm there.

7 Q. Withdrawn.

8 Sir, I've read your opinions about the
9 Neibauer reference and your opinion that it's not a
10 serious reference that would have been consulted by a
11 person of ordinary skill in the art. Are you aware that
12 a parent patent in this family was, in fact, invalidated
13 based, in part, by the Neibauer reference in a
14 re-examination?

15 MS. PARTRIDGE: Objection; foundation.

16 A. I may or may not be aware of that. I would
17 have to look through my notes to remember for sure.

18 But I don't see how that materially changes
19 my opinion that that reference is not, as you termed it,
20 a serious reference in this case. Neibauer not being a,
21 quote/unquote, serious reference is one of a number of
22 reasons that I'm stating for why it cannot possibly

1 invalidate these patents, but there are a variety of
2 other, more technical reasons that go to the substance
3 of what the patents themselves invent versus what
4 Neibauer teaches.

5 Having said all that, I also believe that --
6 in my opinion, there is no way that an expert would have
7 looked to Neibauer. So any reference to it is a total
8 application of hindsight.

9 Q. So focusing just on -- aside from whatever
10 technical arguments you have, just about Neibauer as a
11 reference, are you saying it would be improper for the
12 board to rely on Neibauer to find unpatentability of the
13 challenged claims because it's a reference geared toward
14 lay people? Is that your view?

15 MS. PARTRIDGE: Objection; form.

16 A. In my understanding, it's not my place to
17 instruct the board on what is proper or improper. I'm
18 just stating my expert opinion that a person of ordinary
19 skill in the art would not have looked at Neibauer.
20 Even if Neibauer had taught things that were much more
21 closely related to these patents -- which it doesn't --
22 but even if that were the case, we would still, I think,

1 reasonably have to have a discussion about whether
2 Neibauer is a reference that a POSITA would look at.

3 Having said all that, a POSITA would -- even
4 if they wanted to look at Neibauer, there is a plethora
5 of reasons why Neibauer is not a suitable reference, and
6 I state those in my declaration.

7 Q. So we can go off that detour and go back to
8 paragraph 119, which is talking about the Cheng
9 reference. That's on page 65 of your declaration.

10 And you say in paragraph 119 that "Cheng
11 generally describes a method wherein a proxy server acts
12 as a website and reformats its visual elements to allow
13 viewing by a mobile device." Do you see that?

14 A. Yes.

15 Q. And do you recall Dr. Madiseti saying that
16 these types of techniques were actually common prior to
17 June 2002?

18 MS. PARTRIDGE: Objection; form.

19 A. The types of techniques disclosed in Cheng?

20 Q. Well, the use of a proxy server to reformat a
21 website for viewing by a mobile device.

22 MS. PARTRIDGE: Objection; form.

1 A. That was one of the ways that one would
2 potentially do that. There were other ways of doing it
3 as well. But I would not necessarily dispute that on
4 its face. Sort of divorced of other content -- context,
5 rather, I'm okay with that characterization.

6 Q. Sir, if you could jump to paragraph 139 of
7 your declaration on page 74.

8 A. Okay.

9 Q. In paragraph 139, you're referring to the
10 Ausems reference, A-u-s-e-m-s. And you say "Ausems
11 fails to mention GSM, CDMA, TDMA, or any other cellular
12 network protocol."

13 I just want the record to be clear. What
14 does CDMA refer to?

15 A. It's a wireless protocol that would have been
16 in existence in that time frame.

17 Q. And the same with TDMA?

18 A. Oh, sorry. I thought you asked me about
19 TDMA. You asked about CDMA?

20 Q. Yes, sir.

21 A. Oh, yeah. It's a -- yeah. Both of them are
22 wireless network -- sorry -- cellular network protocols.

1 Q. And obviously GSM falls in that category too,
2 correct?

3 A. Yes.

4 MR. WEINSTEIN: Why don't we take a
5 ten-minute break, if that's okay. I'll let you know
6 we're getting actually pretty close to the end.

7 THE WITNESS: Okay. Thank you. Sounds good.

8 (Off the record: 11:13 a.m. to 11:24 a.m.)

9 THE REPORTER: So we're back on the record,
10 then.

11 MR. WEINSTEIN: Sir, I actually don't have
12 any more questions for you at this time, but I wanted to
13 thank you very much for appearing for the deposition
14 today. I know it's close to the holidays, and I
15 appreciate your accommodation.

16 With that, I'll pass the witness.

17 THE WITNESS: Thank you.

18 MS. PARTRIDGE: Okay. And we'll take a
19 break. Let's say 20 minutes, but I may need less.

20 MR. WEINSTEIN: 20 minutes? Okay.

21 MS. PARTRIDGE: I don't know. I mean, we can
22 say less, but right now I'm going to say 20 minutes.

1 MR. WEINSTEIN: Okay.

2 (Off the record: 11:24 a.m. to 11:45 a.m.)

3 MS. PARTRIDGE: I just want to make sure.

4 Are we back on the record?

5 THE REPORTER: Yes. We're on the record.

6 EXAMINATION

7 BY MS. PARTRIDGE:

8 Q. Okay. Good morning, Dr. Medvidovic.

9 A. Good morning.

10 Q. For you. I guess it's afternoon for me.

11 But I'm Jayme Partridge, as you know, and I
12 am representing MTD. And I want to ask you a few
13 questions. Okay?

14 A. Okay.

15 Q. Earlier when you were talking with
16 Mr. Weinstein, you talked about GSM, correct?

17 A. Correct. That's one of the protocols that --
18 cellular protocols that was mentioned.

19 Q. Could GSM support a Yahoo group chat as
20 described in Chapter 21 of Neibauer?

21 A. No, it could not.

22 Q. And why not?

1 A. For the same reasons that I mentioned when
2 counsel asked me about 3G and, before that, 2G. There
3 are severe bandwidth limitations.

4 Q. You also spoke earlier about a GPRS protocol,
5 correct?

6 A. GPRS?

7 Q. A GPRS protocol, correct?

8 A. That is correct.

9 Q. Could a GPRS protocol support a Yahoo group
10 chat as described in Chapter 21 of Neibauer?

11 A. Again, it would not have worked, because the
12 kinds of capabilities that were described made
13 assumptions about bandwidth that these earlier protocols
14 were just simply not able to handle.

15 Q. And let me direct your attention to
16 paragraphs 105 and 106 of your declaration, which is
17 Exhibit 2007.

18 A. Okay.

19 Q. What are -- do you see the images or the
20 screenshots in paragraphs 105 and 106?

21 A. Yes. These are Neibauer Images 21-8 and
22 21-10.

1 Q. Now, are these images captured from a mobile
2 browser?

3 A. No, they're not. These are images captured,
4 presumably, from Internet Explorer that you would have
5 running on your full-blown computer, like a desktop or a
6 laptop that would run Windows.

7 Q. So would these images be captured from a
8 mobile device?

9 A. No. Mobile browsers at that time would not
10 have had these capabilities. So, for example, if you
11 look at the image in paragraph 105, which is Neibauer's
12 Figure 21-8, the Yahoo Clubs thing on the left-hand side
13 is what is known as a frame. And mobile browsers did
14 not have -- generally did not have support for things
15 like frames.

16 Q. Let me also direct your attention to
17 paragraph 103 of your declaration. You spoke about that
18 earlier.

19 A. Okay.

20 Q. And do you see -- I'm directing you
21 specifically to the middle image in the indented portion
22 of paragraph 103. Are you there?

1 A. Yes.

2 Q. And that's the one where it has a ticker
3 symbol in the image?

4 A. Correct.

5 Q. Okay. Regarding that image, what can a user
6 input regarding the ticker symbol?

7 A. As I already spoke with -- about this with
8 Meta's counsel, this would be a three- or four-symbol --
9 or sorry -- three- or four-character ticker symbol that
10 a user would input.

11 Q. So this would be limited to a three- or
12 four-digit ticker symbol that a user could input,
13 correct?

14 A. Yes, the kinds of things that -- you know,
15 the codes that are used to represent various stocks in
16 the stock market.

17 Q. And the stock quote data, you testified that
18 it could be returned, correct?

19 MR. WEINSTEIN: Object to form, leading.

20 A. That's correct. So the idea is that you
21 would ask for stock -- let's say Microsoft stock or
22 something like that -- and you would enter the ticker

1 code, which is this three- or four-character code. And
2 the idea here is that Yahoo Mobile allowed for -- under
3 specific circumstances, as described in the Neibauer
4 reference, it would allow for that information to be
5 periodically reported to you.

6 Q. So just to clean it up. What could be
7 returned after a user put in a ticker symbol?

8 A. What would be --

9 MR. WEINSTEIN: Object to form.

10 Go ahead. Sorry.

11 A. What would be returned is the current dollar
12 value of whatever the stock is that the user requested.

13 Q. How much data is that?

14 A. So let me just augment what I said.

15 It would be a little bit more information
16 than just the dollar value, because it would also
17 specify some other -- potentially other information, as
18 displayed here. It would also tell you, for example, if
19 the stock has gone up or down. Kind of very rudimentary
20 stuff.

21 So sending it from your PDA, you would send
22 about, let's say, on the order of 25 to 30 bits, 32.

1 Coming back, you might get on the order of -- I don't
2 know -- let's say 100 to 120 bits, basically, depending
3 on the information that gets returned. But very small
4 amounts of information.

5 Q. And how many ASCII characters would the
6 return data represent?

7 A. So the return data would -- the data you send
8 out would be three to four ASCII characters. The data
9 you got back, depending on what gets reported -- for
10 example, in this case, it says the last trade was on
11 October 22nd. So that's what? Five ASCII characters,
12 plus six more, that's 11. And then there would be a
13 change. So that's on the order of about 20 ASCII
14 characters coming back. So we're talking very few, less
15 than half a dozen going out and maybe a couple dozen
16 coming back.

17 Q. And how much bandwidth would be required to
18 send that much data?

19 A. Not very much at all. So one of the
20 protocols that we discussed that were not capacious
21 enough to support the teachings of the patents in
22 question would have been sufficient -- or sufficiently

1 capacious to send back and forth this data, because,
2 again, this is just a handful of characters.

3 Q. How would you compare this amount of data to
4 how much data would be required to send a full-color
5 image?

6 MR. WEINSTEIN: Object to form.

7 A. A full-color image encoded as a GIF -- or
8 Counsel referred to it as GIF, which I actually think is
9 correct even. So I keep -- I just routinely
10 mispronounce that nonetheless -- or a JPEG image or a --
11 I don't know -- maybe like an MPEG video pop file or
12 whatever, there we're talking millions of characters.
13 And then if you're talking about, like, an MP3 video or
14 MP2 video or even an audio file, you're talking tens of
15 millions of characters. So this is literally whatever
16 we see here times a million, essentially.

17 Q. And can you give me just an estimate of how
18 many bytes that would represent?

19 A. So each character we can think of as a byte.
20 So it would be -- let's say a 2-megabyte color image --
21 or even if it's a black and white image it could get
22 really large. But let's say a 2-megabyte color image --

1 which is not unreasonable. There are larger images --
2 that's 2,000 bytes or 16 -- sorry -- 2 million bytes --
3 well, actually, it's more than that, but -- because, as
4 Counsel pointed out, these numbers are multiplied by
5 1024 rather than a thousand. But just as an
6 approximation, it would be about 2 million bytes, which
7 is actually about 16 million bits.

8 So just to transfer one of these images, you
9 need 16 million bits, and G3, the protocol, is at -- I
10 think we said it was 144 kilobits per second -- sorry --
11 3G, rather -- 144 kilobits per second. So it's capable
12 of transferring 144,000 bits per second, and here we
13 have 16 million bits.

14 So it would need on the order of about
15 20 seconds, if my math is correct -- I'm just doing this
16 in my head. But just to transfer one photograph, you'd
17 need about 20 seconds with a protocol that is
18 significantly more advanced than any of the protocols
19 that we have discussed. This is why none of the things
20 that we talked about would be viable -- that we talked
21 about in the context of the Neibauer reference and the
22 PDA usage would be viable with any of these protocols.

1 Q. And when you're talking about with a protocol
2 that is significantly more advanced than any of the
3 protocols we have discussed, do you mean a 2G protocol?

4 A. In fact, I mean even the early version of 3G
5 before 3G+ came on the scene. So even with 3G, which
6 was -- which came out in -- let me just do this again,
7 because I have the date roughly.

8 So 3G was available as of 2002. Even with
9 3G, which is significantly more advanced than these
10 other cellular protocols, you would have needed on the
11 order of 20 seconds just to transfer a single color
12 image.

13 Q. So at the time of the priority dates of the
14 patents-in-suit, would any networks available be able to
15 transmit the amount of data that we've been talking
16 about?

17 A. In my view, definitely not. And I think
18 that's actually an objective opinion, because we know
19 what these protocols and implementations were able to
20 support. So it's not just an opinion. I think that
21 anybody looking at these numbers would be able to do the
22 math. The math is pretty straightforward. It would

1 have been prohibitively long to do anything that would
2 even approximate what is taught in these patents.

3 MS. PARTRIDGE: Okay. Let me go off the
4 record for a minute, and then -- just give me a minute.
5 Okay?

6 THE REPORTER: Okay. We're off the record.

7 (Off the record: 11:58 a.m. to 12:00 p.m.)

8 THE REPORTER: We're back on the record.

9 MS. PARTRIDGE: I'll pass the witness.

10 MR. WEINSTEIN: Okay. I need about two
11 minutes to sort of see if there's any follow-up, if
12 that's okay.

13 MS. PARTRIDGE: Sure.

14 MR. WEINSTEIN: We'll do five minutes, if
15 that's okay.

16 THE WITNESS: Sure.

17 (Off the record: 12:00 p.m. to 12:04 p.m.)

18 THE REPORTER: We're back on the record.

19 EXAMINATION

20 BY MR. WEINSTEIN:

21 Q. Welcome back, sir.

22 A. Thank you.

1 Q. I just had only a couple follow-up questions
2 on sort of the exchange that you just had with counsel
3 for Patent Owner.

4 You mentioned whether or not GSM would be
5 capable of supporting the Yahoo group chat feature as
6 described in Chapter 1 -- withdrawn.

7 Earlier you mentioned whether or not GSM
8 could support the Yahoo group chat feature as described
9 in Chapter 21 of Neibauer. Do you recall what the data
10 rate of GSM was as of June 2002?

11 A. I don't have that information.

12 But also for the record, the Yahoo group chat
13 in Chapter 21 has nothing to do with mobility. It's not
14 something that Neibauer talks about or contemplates. So
15 that feature was completely divorced of any discussion
16 of mobility, which is in, I think, like, Chapter 7 or
17 something.

18 Q. I understand. I'm just trying to focus on
19 the data rate of GSM as of June 2002. And it's your
20 testimony that you don't recall what the data rate is?

21 A. I do not. No. I did not opine on that in my
22 declaration.

1 Q. Okay. And you also mentioned GPRS. Do you
2 recall what the data transfer rate was of GPS- --
3 withdrawn. I keep messing up the acronyms.

4 Do you recall, sir, what the data transfer
5 rate was for GPRS as of June 2002?

6 A. I do not, but I am quite confident that it
7 would not have supported the capabilities in the
8 asserted patents. There is -- I think it's got to be
9 material to talk about it in the context of the Yahoo
10 group chats, because Neibauer never even anticipates
11 group chats being used in a mobile setting.

12 Q. Right. But you just testified on redirect
13 that GPRS could not support a Yahoo group chat as
14 described in Neibauer. I'm just trying to understand
15 what was the data transfer rate of GPRS, if you recall.

16 A. I don't have that information. Again, I did
17 not opine on that in my declaration. I did opine on 3G
18 and 3G+.

19 Q. Okay. Understood.

20 When Neibauer was published in 2000, based on
21 your personal experience, what would have been the
22 predominant way that a user would have connected to the

1 Yahoo website using their desktop computer?

2 A. Can you be more specific?

3 Q. Well, you talked about how -- the fact that
4 Neibauer discloses a sort of desktop website, non-mobile
5 implementation, correct?

6 A. Correct.

7 Q. What would -- how would the user have gone
8 about connecting to the Yahoo website in 2000 using
9 their desktop computer, if you recall?

10 A. Presumably using some sort of either wireless
11 or dial-up connection. You know, I cannot -- I don't
12 think it's reasonable for me to postulate on what every
13 Yahoo user might have been -- might have had available
14 at that time. Generally, people were still heavily
15 using dial-up connections, but there were some who --
16 maybe higher end users who may have been using Wi-Fi.

17 Q. Okay. So a dial-up connection, they would
18 have used, like, a dial-up modem that would have gone
19 over the telephone line, for example, to connect?

20 A. If that's what they were using, presumably
21 yes.

22 Q. Do you recall what the data transfer rates

1 were of dial-up modems at the time that Neibauer was
2 published in 2000?

3 A. I think you represented it to be on the order
4 of -- whatever it was -- 50 kilobits or some --
5 56 kilobits per second, perhaps.

6 Q. Well, I thought it was 56K, but I'm asking if
7 you have an independent understanding of that.

8 A. Just like with the questions about GPRS, it's
9 just not something that I opined on in my declaration.
10 In the context of the cellular networks, I know that
11 there were less than the amount I stated in my
12 declaration.

13 As far as dial-up is concerned, I mean, it
14 was pretty slow, but, again, for some of the
15 capabilities that are described here, it's possible that
16 they may have been reasonably accessible. But there
17 would be others, my guess would be, that would be too
18 slow if you went over dial-up. It just depends on what
19 the scenario is.

20 Q. So are there any features of Yahoo that you
21 looked at in Neibauer that, in your opinion, would not
22 have been supportable over a dial-up connection?

1 MS. PARTRIDGE: Objection; form.

2 A. Well, it depends on what you mean by
3 "supportable." You and I could have a videoconference
4 over a dial-up connection if we're willing to spend a
5 year and a half transferring back three minutes' worth
6 of conversation. Right?

7 So there are what in software engineering we
8 would call known functional properties that are
9 important; is it reliable, is it fast enough, are there
10 real-time characteristics that are satisfied, et cetera.
11 So it just depends on what are the specific things that
12 we are, you know, looking at here.

13 If, for example, you have -- here in the
14 screenshot, it says there is some kind of -- a set of
15 low-resolution pictures on the order of 20 to
16 50 kilobytes, give or take. If your whole goal is to
17 transfer those and you look at them whenever they
18 arrive, then who cares. Right? If you're trying to do
19 things more directly, like the kinds of messages --
20 messaging and interaction along the lines of what the
21 patents talk about, then this would not be viable. So
22 it just depends on what is the specific use case

1 scenario.

2 Q. Understood.

3 MR. WEINSTEIN: Okay. With that, I don't
4 have any more questions for you, sir. I want to thank
5 you for appearing.

6 So I'll pass the witness again.

7 THE WITNESS: Okay.

8 MS. PARTRIDGE: Okay. Give me 30 seconds.

9 MR. WEINSTEIN: Okay. I guess we can...

10 (Off the record: 12:11 p.m. to 12:13 p.m.)

11 MS. PARTRIDGE: Okay. We're done. No more
12 questions.

13 MR. WEINSTEIN: No more questions for us.

14 And thanks again to the witness for showing
15 up on December 23rd. I know you've --

16 MS. PARTRIDGE: Seriously? What about me?
17 Seriously?

18 (Discussion off the record.)

19 THE REPORTER: I have no questions for the
20 witness. I just need to confirm transcript orders with
21 counsel before you go.

22 So, Mr. Weinstein, I have you down for a

1 rough draft today and the final by Friday. Is that
2 correct?

3 MR. WEINSTEIN: That'll work. Yeah.

4 THE REPORTER: And, Ms. Partridge, would you
5 like to order the transcript?

6 MS. PARTRIDGE: Sure. Yes. Do the same as
7 whatever they're doing.

8 (Proceedings concluded at 12:13 p.m.)
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CERTIFICATE OF SHORTHAND REPORTER

I, CRYSTAL HEREFORD, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my direction; that reading and signing was not discussed; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my signature this 27th day of December 2024.

Crystal Hereford

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