

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FREEWHEEL MEDIA, INC.,

Petitioner,

v.

ALMONDNET, INC.,

Patent Owner.

Case IPR2024-00421
Case IPR2024-00422
Patent No. 7,861,220

REMOTE DEPOSITION OF ERIK DE LA IGLESIA
MOUNTAIN VIEW, CALIFORNIA (DEPONENT'S LOCATION)
MONDAY, MARCH 10, 2025

Magna Job No.: 1293856

Reported by: Kimberly Crane, CSR No. 11594, RPR, CLR

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Case IPR2024-00421

10 Case IPR2024-00422

Patent No. 7,861,220

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20 On Monday, March 10, 2025, commencing at
21 9:00 a.m., ERIK DE LA IGLESIA, was administered the
22 oath and sworn in remotely and was stenographically
23 reported by Kimberly Crane, Certified Shorthand
24 Reporter No. 11594, Registered Professional Reporter,
25 and Certified LiveNote Reporter.

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I N D E X

	PAGE
EXAMINATION OF ERIK DE LA IGLESIA	
BY MR. GETZELMAN	6
BY MR. MILKEY	26

E X H I B I T S

(NONE OFFERED)

1 MOUNTAIN VIEW, CALIFORNIA; MONDAY, MARCH 10, 2025;

2 9:00 A.M.

3 -- o0o --

4

5 THE COURT REPORTER: Good morning. My name
6 is Kim Crane. I am a Certified Shorthand Reporter in
7 the state of California. My CSR Number is 11594.

8 And please state your appearances for the
9 record.

10 MR. GETZELMAN: My name is Zachary Getzelman
11 from Banner & Witcoff. I represent the Petitioner in
12 this.

13 MR. MILKEY: And this is James Milkey with
14 the law firm of Russ, August & Kabat representing
15 Patent Owner and the witness.

16 MR. WU: This is Andy Mu. I'm with
17 Banner & Witcoff as well, representing Petitioner.

18 MS. PATEL: This is Shambhavi Patel. I'm
19 with Banner & Witcoff representing Petitioner.

20

21 ERIK DE LA IGLESIA,
22 called as a witness on behalf of the Petitioner,
23 having been first duly sworn, testified as follows:

24 ///

25 ///

1 CROSS-EXAMINATION

2 BY MR. GETZELMAN:

3 Q. Good morning, Mr. de la Iglesia.

4 Can you please state your name and address
5 for the record.

6 A. Good morning, Mr. Getzelman. Erik de la
7 Iglesia. My address is 400 Mountain Laurel Court in
8 Mountain View, California.

9 Q. I would like to start just with some basic
10 questions regarding that we're on video conference
11 today.

12 Can we all agree that if someone drops off
13 the video conference, that we wait until that person
14 rejoins?

15 A. Certainly. And if anyone has any -- if I
16 disappear, someone please tell me or if I freeze.

17 Q. We will do that.

18 Mr. de la Iglesia, is anyone else in the
19 room with you right now?

20 A. No.

21 Q. Do you have any other electronic devices in
22 the room with you that are nearby?

23 A. No. My phone is in the kitchen, and it is
24 silent. So it should not be -- nothing should be
25 happening with the phone.

1 Just for the record, I do have a second
2 monitor sort of this way, so I will be looking sort
3 of at my 2:00 once we get to exhibits.

4 Q. Okay. Thank you for that clarification.
5 Where are you located right now?

6 A. I'm in my home at 400 Mountain Laurel Court.

7 Q. Okay. You understand that we are here today
8 to question you because you submitted declarations in
9 support of each of AlmondNet patent owners' responses
10 in two different Inter Partes Reviews or IPRs related
11 to U.S. Patent Number 7,861,260?

12 A. Yes. I recall there being two IPR numbers
13 on the cover sheet when I signed it, but I understand
14 we're just talking about the '260 patent today and
15 the specific issues I addressed.

16 Q. Okay. And as you just referred, if I refer
17 to the '260 patent, you will understand that I'm
18 referring to U.S. Patent Number 7,861,260, correct?

19 A. I don't have the full seven digits
20 memorized, but I will trust that you've gotten that
21 correct.

22 Q. Thank you.

23 Is there anything that would prevent you
24 from providing truthful and accurate testimony today?

25 A. No.

1 Q. If I say anything that confuses you, would
2 you please ask for clarification?

3 A. Certainly.

4 Q. And unless you tell me otherwise, you agree
5 that it is fair to assume you heard and understood my
6 question?

7 A. Unless I ask for a clarification, we can
8 assume that.

9 Q. Okay. Do you agree to provide verbal
10 answers and not answer questions by merely shaking or
11 nodding your head?

12 A. I certainly will. And if you have any
13 doubts as to my answer, please just tell me to
14 reanswer and I will do that for you.

15 Q. Thank you so much.

16 You understand that you're under oath for
17 today's deposition, correct?

18 A. Yes.

19 Q. And you understand that if your attorney
20 objects to the form of a question, you're still
21 required to answer my question?

22 A. I do.

23 Q. You understand that while I'm asking you
24 questions today, you are not allowed to communicate
25 with your counsel regarding your testimony, correct?

1 A. I understand that, yes.

2 Q. And do you understand that we are not
3 allowed to communicate -- that you are not allowed to
4 communicate with counsel regarding your testimony
5 during any breaks we take?

6 A. That's my understanding, and that's my
7 practice.

8 Q. Okay. I will plan to take a few breaks, but
9 if you need a break, please let me know. All that I
10 ask is that if there is a pending question, you
11 provide your answer before we take the break.

12 A. I'm perfectly fine. And if, you know, we
13 could do at least sort of a, you know, water break or
14 tea break sort of close to on the hour, that would be
15 wonderful.

16 Q. We will do that. If I'm missing the time,
17 please remind me.

18 Did you do anything to prepare for today's
19 deposition?

20 A. Yes.

21 Q. What did you do to prepare?

22 A. Met with counsel.

23 Q. Who?

24 A. Mr. Milkey.

25 Q. How many times did you meet with Mr. Milkey?

1 A. Once.

2 Q. Once.

3 And about how long was that meeting?

4 A. Maybe an hour, an hour and change.

5 Q. And when did you meet with him for this
6 meeting?

7 A. I think it was Saturday. I think it was
8 Saturday morning, if memory serves.

9 Q. Besides Mr. Milkey, did you speak with
10 anyone other than counsel for AlmondNet to prepare
11 for this deposition?

12 A. No.

13 Q. Did you review any materials to prepare for
14 this deposition?

15 A. I reviewed my declaration.

16 Q. Anything else?

17 A. No.

18 Q. Okay. As discussed earlier, we're here to
19 question you regarding the declaration. I've already
20 put a copy of Exhibit 2001 in the chat.

21 Can you let me know when you have that open?

22 A. Let me pull that down. Okay. I have that
23 down. It doesn't have the yellow sticker on it, but
24 it's got an Exhibit 2001 marking at the bottom right.

25 Q. That's correct.

1 And do you recognize this document?

2 A. I haven't paged through every page, but that
3 certainly looks like my declaration.

4 Q. Okay. And you see the case numbers on the
5 cover page, IPR2024-00421 and IPR2024-00422?

6 A. I see both of those.

7 Q. And this is the same declaration you
8 submitted for both of those IPRs; is that correct?

9 A. Yes.

10 Q. Okay. If I refer to your declaration, you
11 will understand that I'm referring to this
12 declaration filed in support of those proceedings?

13 A. Yes. I assume we're only here to talk about
14 one declaration, that being this declaration.

15 Q. Correct. Yes.

16 Is it fair to say that all of your opinions
17 that you have in these IPR proceedings are contained
18 in this declaration?

19 A. Well, I think it's fair to say that all of
20 my opinions with respect to Dr. Lett's Grounds A and
21 B are present in this declaration.

22 I understand that to the extent you ask me
23 about any material today, my opinions responsive to
24 your questions might be relevant to the proceedings.

25 Q. Understood.

1 So just to reframe that question, then, it's
2 fair to say that all of your opinions based on
3 Mr. Lett's declarations filed with the petition are
4 currently contained in this declaration?

5 A. All of the opinions that I had expressed at
6 the time I wrote the declaration are in the
7 declaration, and those opinions are responsive to
8 Dr. Lett's Grounds A and B.

9 Q. Okay. Could you please turn to paragraph 38
10 of your declaration.

11 A. Okay. I'm at paragraph 38. I'll let you
12 ask the question first so we're not wasting time
13 rereading stuff we don't need to.

14 Q. Okay. Could you please -- in paragraph 38,
15 you state: "There are numerous reasons why it would
16 not have been obvious to add an STB to a coffee shop
17 offering Wi-Fi hotspot service in the manner Mr. Lett
18 suggests."

19 Did I read that correctly?

20 A. You may have dropped the "also" in the first
21 sentence. This is an "also" sentence, and so there
22 was previous discussion with respect to why it would
23 not have been obvious.

24 Q. Okay. And then can you read, for the
25 record, the last sentence of paragraph 38?

1 A. The last sentence of my paragraph 38 is: "A
2 POSITA would not have found it obvious to add an STB
3 to a coffee shop, as Mr. Lett suggests, in light of
4 these obvious drawbacks."

5 Q. Thank you.

6 Is it your understanding that Petitioners'
7 combination of Baig's Wi-Fi hotspots and Costa's STB
8 are limited to coffee shops?

9 MR. MILKEY: Objection to form.

10 THE WITNESS: Well, Mr. Getzelman, I'm
11 responding to Dr. Lett and Dr. Lett's petition. I'm
12 not aware that petitioners outside of Dr. Lett had
13 submitted an expert declaration for me to review.

14 BY MR. GETZELMAN:

15 Q. So is it your understanding that Mr. Lett's
16 combination of Baig's Wi-Fi hotspots and Costa's STB
17 are limited to coffee shops?

18 MR. MILKEY: Objection to form.

19 THE WITNESS: I understand that Dr. Lett's
20 only suggestion in terms of combination was a coffee
21 shop. My objections and my rationale for
22 non-obviousness would, of course, extend beyond
23 coffee shops.

24 BY MR. GETZELMAN:

25 Q. Did you include those objections and

1 rationales in this declaration?

2 MR. MILKEY: Objection to form.

3 THE WITNESS: Those objections are in my
4 declarations, and they apply equally to coffee shops
5 and other alleged combinations of Baig and a set-top
6 box.

7 BY MR. GETZELMAN:

8 Q. Okay. I am going to put Exhibit 1007 in the
9 Chat. Please let me know when you open that exhibit.

10 A. So I have Exhibit 7 open, which I recognize
11 as the Baig application, just to be clear. I'm not
12 sure if a patent issued from this, but I have the
13 Baig application as Exhibit 7 that's US 2008/0113674.

14 Q. Correct. If I refer to this exhibit as
15 "Baign," would you understand that I'm referring to
16 Exhibit 1007?

17 A. That's how I refer to it, so please correct
18 me if we don't sync on that.

19 Q. Okay. Can you turn to paragraph 37 of Baig?

20 A. Just to be clear, sir, are we on PDF 37?

21 Q. Paragraph 37.

22 A. Paragraph 37.

23 Okay. I have paragraph -- just one minute.
24 I have paragraph 37, and I will note that this
25 exhibit seems to have some markings on the side of

1 it. I assume that those are column conversion --

2 Q. Yes.

3 A. -- markings.

4 Okay. So I have paragraph 37 in front of
5 me. I will wait to reread it before -- wait for your
6 question before I reread anything.

7 Q. Okay. In paragraph 37, the second sentence,
8 do you see that it states: "One trend is the rising
9 popularity and availability of wireless technologies,
10 such as Wi-Fi technology, particularly in public
11 settings in metropolitan locations."

12 Did I read that correctly?

13 A. It looks like you have read the second
14 sentence of paragraph 37 of Baig correctly.

15 Q. Thank you. And in the -- the next sentence
16 says: "The public deployment of Wi-Fi networks have
17 skyrocketed in parks, cafes, bookstores, airports and
18 college campuses."

19 Did I read that correctly?

20 A. You read "the" into the public deployment,
21 but I think otherwise you read the sentence
22 correctly.

23 Q. Thank you.

24 Can you turn to paragraph 126 of Baig.

25 A. I'm at paragraph 126.

1 Q. Can you read the first sentence of 126 into
2 the record?

3 A. Sure. Paragraph -- the first sentence of
4 126, paragraph 126 of Baig reads: "The message board
5 service allows users at a particular location, e.g.
6 an airport, to post messages that will stay posted
7 for that particular location for a time after the
8 user has logged off."

9 Q. Would you agree that it's fair to say that
10 the hotspot discussed in paragraph 126 in Baig is in
11 reference to a hotspot in an airport?

12 A. Well, the reference in this particular
13 Baig -- in this particular Baig paragraph is to an
14 airport. I'm not aware of Dr. Lett having described
15 any specifics, set-top box combinations within an
16 airport.

17 Q. I appreciate that, but what I'm asking you
18 right now, in the paragraph we just read, is it fair
19 to say that Baig -- the hotspot in this paragraph is
20 reference to a hotspot in an airport?

21 MR. MILKEY: Objection to form. Outside of
22 the scope of the declaration.

23 THE WITNESS: The hotspot here referenced in
24 Baig 126 contrary to Dr. Lett's exemplary hotspot is
25 in an airport.

1 BY MR. GETZELMAN:

2 Q. So I'm just asking for a yes-or-no question,
3 and let's not focus on Lett's declaration right now.
4 I'm only asking you what Baig discloses.

5 And in this paragraph, is Baig disclosing a
6 hotspot in an airport?

7 A. Well, Mr. Getzelman, the focus of my
8 declaration is Dr. Lett's declaration. So
9 contrary --

10 Q. Appreciate it.

11 A. -- to Dr. Lett's declaration, this
12 particular hotspot in Baig is referencing an airport.

13 Q. Thank you.

14 So focusing on just Baig, you would agree
15 that Baig Wi-Fi hotspots are not limited to coffee
16 shops?

17 MR. MILKEY: Objection to form.

18 THE WITNESS: I would agree that the Baig
19 hotspots would not be -- are described generally, as
20 opposed to the specific hotspot of Dr. Lett's coffee
21 shop.

22 BY MR. GETZELMAN:

23 Q. Did you analyze the Baig reference outside
24 of Dr. Lett's declaration?

25 MR. MILKEY: Object to form.

1 THE WITNESS: I analyzed Dr. Lett's
2 combination of Baig with a set-top box. For my
3 discussion, I included references to his specific
4 coffee shop example and all of my opinions are
5 equally relevant to other combinations of Baig with a
6 set-top box as per Dr. Lett's Costa combination.

7 BY MR. GETZELMAN:

8 Q. Okay. I'm going to now drop in the Chat a
9 copy of Exhibit 1011. Please let me know when you
10 have it open.

11 A. So I have Exhibit 1011, which I recognize as
12 the Costa-Requena reference. I hope we can call that
13 Costa. I think that's how everyone has been
14 referring to it. And I'm reading that as
15 Publication US 2006/0128364.

16 Q. Thank you. And I will also refer to it as
17 Costa as well.

18 A. Right.

19 Q. In the Costa reference, can you turn to
20 paragraph 6?

21 A. So I'm at paragraph 6.

22 Q. And can you read into the record the second
23 sentence of paragraph 6 starting with: "UPnP is
24 designed..."

25 A. So "UPnP," which is defined elsewhere as, if

1 memory serves, universal plug and play, so LAN
2 technology, "is designed to work in many
3 environments, including the home, businesses, public
4 spaces, and on devices attached to the internet."

5 Q. Thank you. Could you also now turn to
6 paragraph 36?

7 A. I'm at paragraph 36.

8 Q. Can you read into the record the first two
9 sentences ending with "et cetera"?

10 A. The first two sentence of paragraph 36 of
11 Costa says: "The UPnP network 104 (or similar
12 networking technology) allows devices to exchange
13 data in a local environment 110.

14 "The local environment 110 typically
15 includes a home or office, although it will be
16 appreciated that other environments may provide UPnP
17 connectivity, including automobiles, airplanes,
18 boats, public wireless hotshots, et cetera."

19 Q. Thank you.

20 So is it fair to say that Costa discloses a
21 local network designed to work in multiple
22 environments?

23 A. Mr. Getzelman, Costa is disclosing a UPnP
24 network, a plug and play network.

25 Q. Correct.

1 A. Let's not confuse that with a network
2 generally. That would be something a POSITA would
3 not do.

4 Q. Does it not say a UPn network 104 or a
5 similar networking technology at the beginning?

6 A. That's exactly what it says, a similar to
7 plug and play network.

8 Q. I appreciate that. And Costa discloses that
9 these networks can be designed to work in multiple
10 environments; is that correct?

11 A. Costa describes their universal plug and
12 play networks as networks that are designed to
13 exchange data in a local environment.

14 Q. Okay. And these local environments can
15 include a public Wi-Fi hotspot; is that correct?

16 A. Well, Costa discloses the local environment
17 110, in which these universal plug and play networks
18 could exchange data as the list of -- the list of
19 potential environments in Column 4.

20 And I'm sorry, the line numbering is off
21 here, but the list that's provided in paragraph 36.

22 Q. And that list includes public wireless
23 hotspots; is that correct?

24 A. That list for universal plug and play
25 networks includes the list of electronic devices,

1 televisions, audio systems, computers, telephones,
2 analog telephones, cordless phones, digital media
3 centers such as set-top boxes, MP3, jukeboxes, other
4 devices that would be relevant to a plug and play
5 network.

6 Q. Thank you.

7 So you would agree that Costa discloses a
8 set-top box being used in one of these local networks
9 we've been discussing?

10 A. Costa cites a set-top box as an example of a
11 digital media center that could be deployed in a
12 universal plug and play network.

13 Q. And these universal plug and play networks
14 could be utilized in a public wireless hotspot per
15 Costa; is that correct?

16 A. Well, let's look a little bit closer at what
17 the Costa language is saying.

18 Q. I'm just asking you what paragraph 36 says.

19 A. I can read you paragraph 36. And I think
20 I've already done so, but it says: "The local
21 environment 110," which is where the universal plug
22 and play network allows devices to exchange data,
23 "typically includes a home or office, which is
24 consistent with the plug and play environment,
25 although it will be appreciated that other

1 environments may provide UPnP connectivity," and then
2 provides a list.

3 Q. And in that list, public wireless hotspots
4 is included; am I correct?

5 A. I would say those are environments that
6 provide plug and play connectivity. The Costa
7 reference is not specific as to which -- whether it's
8 those specific elements that are providing that
9 connectivity. For example, an airplane does not
10 provide network connectivity.

11 Q. I understand that, but paragraph 36 of
12 Costa, in regards to the UPnP network 104, states:
13 "Although it will be appreciated that other home
14 environments may provide UPnP connectivity, other
15 environments" -- I apologize, strike that.

16 Paragraph 36 of Costa, in reference to UPnP
17 network 104, states that: "Although it would be
18 appreciated that other environments may provide UPnP
19 connectivity, including automobiles, airplanes,
20 boats, public wireless hotspots, et cetera"; is that
21 correct?

22 A. Those are examples of environments in which
23 some element may provide UPnP connectivity, but the
24 listing that we're discussing here, automobiles,
25 airplanes, boats, public wireless hotspots, those are

1 examples of environments.

2 Q. Thank you.

3 Can you, I guess, move on to paragraph 37 of
4 Costa.

5 A. I'm at paragraph 37.

6 Q. Can you read into the record the third
7 sentence of paragraph 37 beginning with "For
8 example"?

9 A. The third sentence of paragraph 37 reads:
10 "For example, the UPnP network, plug and play network
11 104 may utilize any combination of wired and wireless
12 networking technologies such as Ethernet, 802.11
13 Wi-Fi, X10, powerline networking, infrared,
14 et cetera."

15 Q. Thank you. So Costa discloses that a UPnP
16 network 104 can utilize the wireless technology of
17 Wi-Fi; is that correct?

18 A. I would say that what Costa says directly is
19 that it may utilize any combination of wired and
20 wireless networking technologies, and then lists a
21 few wireless technologies, 802.11 Wi-Fi and, of
22 course, X10 is a powerline networking. Infrared is,
23 of course, a -- is a wireless but non-radio medium.

24 Q. Thank you.

25 So of those technologies, the UPnP network

1 104 of Costa can utilize Wi-Fi; is that correct?

2 A. Well, the --

3 Q. This is a yes-or-no question.

4 MR. MILKEY: Object to form.

5 THE WITNESS: The exact language of
6 paragraph 37 is, "For example, the UPnP network 104
7 may utilize any combination of wired and wireless
8 networking technologies such as Ethernet, 802.11
9 Wi-Fi, X10, powerline networking, infrared,
10 et cetera."

11 MR. GETZELMAN: Thank you. One moment.

12 I would like to take about a five-minute
13 break. We have been going for about a half an hour.

14 Is that okay with everybody?

15 THE COURT REPORTER: Sure.

16 THE WITNESS: Works for me.

17 (A recess was taken.)

18 BY MR. GETZELMAN:

19 Q. Welcome back, Mr. de la Iglesia.

20 Can you confirm what materials you reviewed
21 in preparation your declaration?

22 A. They should have all been listed in my
23 materials considered, but it would have been the --
24 let's see. I have my declaration available here.
25 I'm not sure if it's -- just off of memory here, the

1 patent and the prosecution history I've obviously
 2 been studying, you know, these patents for a while.
 3 I'm very familiar with Baig. I've dealt with it
 4 a number of times. I've reviewed it a number of
 5 times in a number of combinations. And the material
 6 that was cited and discussed by Dr. Lett in his
 7 Grounds A and B.

8 There may have been something else. We'd
 9 have to check my materials considered.

10 Q. Did you review the petition submitted for
 11 these IPRs?

12 A. I think I have seen that petition. I may
 13 have looked at it in the context of what Dr. Lett's A
 14 and B material was cited for. But again, my
 15 declaration is primarily responsive -- it's
 16 responsive to Dr. Lett's opinions.

17 Q. So you did not do an in-depth analysis of
 18 the petitions that were submitted?

19 MR. MILKEY: Objection to form.

20 THE WITNESS: I think it's fair to say that
 21 I believe that I have reviewed the petition in the
 22 context of the material that was relevant to
 23 Dr. Lett's A and B grounds.

24 MR. GETZELMAN: Okay. Thank you. I have no
 25 further questions at this time.

1 MR. MILKEY: All right. I just have a
2 couple of quick questions on redirect.

3

4 REDIRECT EXAMINATION

5 BY MR. MILKEY:

6 Q. Mr. de la Iglesia, do you recall any mention
7 in Mr. Lett's declaration of adding a set-top box to
8 a public hotspot at an airport?

9 A. No. I didn't see any of those, nor did he
10 mention adding a hotspot to some of the other Costa
11 described places, such as his automobile or a boat.
12 I think not even Dr. Lett proposed that a POSITA
13 would think about having a set-top box in a car.

14 Q. Okay. And would your conclusion regarding
15 obviousness change if Mr. Lett had proposed adding a
16 set-top box to a public hotspot at a different
17 location such as an airport?

18 A. Absolutely not. My conclusions would be the
19 same, because it goes to the addition of a set-top
20 box to a space based on the example of the coffee
21 shop used by Dr. Lett.

22 MR. MILKEY: I have no further questions.

23 MR. GETZELMAN: I don't have any further
24 questions either.

25 THE COURT REPORTER: Would you like to read

1 and sign your transcript, sir?

2 THE WITNESS: Jim, do I want to read and
3 sign my transcript?

4 MR. MILKEY: Yeah, we can -- yeah, I think
5 we might as well do that.

6 THE COURT REPORTER: Okay. Very good. So I
7 have the exhibits in the Chat, so I can just use
8 those if you guys would like to attach them.

9 MR. MILKEY: Up to you. I don't know that
10 we need to attach them or not, given that they're
11 part of the record, but --

12 MR. GETZELMAN: Yeah, that part of the
13 record we don't need to attach them then.

14 THE COURT REPORTER: Okay. Sounds good.
15 Mr. Milkey, would you like a copy of the
16 transcript?

17 MR. MILKEY: No, I don't think we need a
18 full copy, just the read and sign.

19 (The deposition was concluded at 9:44 a.m.)

20

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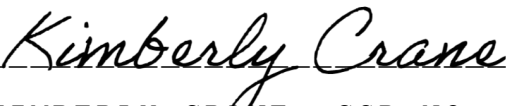
REPORTER'S CERTIFICATION

I, KIMBERLY CRANE, CSR, RPR, reporter in
and for the State of California do hereby certify:

That the proceeding took place before me at
the time and place herein set forth; that the
testimony and proceedings were accurately reported
stenographically by me during the proceeding.

I further certify that I am not related to
any of the parties to this action by blood or
marriage and that I am not interested in the outcome
of this matter, financially or otherwise.

IN WITNESS THEREOF, I have hereunto set my
hand this 13th day of March, 2025.


KIMBERLY CRANE, CSR NO. 11594, RPR

CERTIFICATE OF WITNESS

MAGNA JOB NO.: 1293856

CASE CAPTION: FREEWHEEL MEDIA, INC. VS. INTENT IQ,
LLC

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

Signed on the _____ day of _____,
20____.

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A	amu@bannerwitco...		
a.m 2:21 5:2 27:19 above-captioned 29:10 Absolutely 26:18 accurate 7:24 29:11 accurately 28:8 action 28:12 add 12:16 13:2 adding 26:7,10,15 addition 26:19 address 6:4,7 addressed 7:15 administered 2:21 agree 6:12 8:4,9 16:9 17:14 17:18 21:7 airplane 22:9 airplanes 19:17 22:19,25 airport 16:6,11,14,16,20,25 17:6,12 26:8,17 airports 15:17 alleged 14:5 allowed 8:24 9:3,3 allows 16:5 19:12 21:22 AlmondNet 1:7 2:7 7:9 10:10	amu@bannerwitco... 3:10 analog 21:2 analysis 25:17 analyze 17:23 analyzed 18:1 AND- 3:6,10 and/or 29:12 Andy 3:7 5:16 Angeles 3:17 answer 8:10,13,21 9:11 answers 8:10 apologize 22:15 APPEAL 1:3 2:3 appearances 5:8 application 14:11,13 apply 14:4 appreciate 16:17 17:10 20:8 appreciated 19:16 21:25 22:13,18 asking 8:23 16:17 17:2,4 21:18 assume 8:5,8 11:13 15:1 attach 27:8,10,13 attached 19:4 attorney	8:19 audio 21:1 August 3:15 5:14 automobile 26:11 automobiles 19:17 22:19,24 availability 15:9 available 24:24 aware 13:12 16:14 B B 4:6 11:21 12:8 25:7 25:14,23 back 24:19 Baig 14:5,11,13,15,19 15:14,24 16:4,10,13 16:13,19,24 17:4,5 17:12,14,15,18,23 18:2,5 25:3 Baig's 13:7,16 Bakersfield 3:12 Banner 3:3,7,11 5:11,17,19 based 12:2 26:20 basic 6:9 beginning 20:5 23:7 behalf 3:2,14 5:22 believe 25:21 beyond 13:22	bit 21:16 blood 28:12 Blvd 3:16 board 1:3 2:3 16:4 boat 26:11 boats 19:18 22:20,25 bookstores 15:17 bottom 10:24 box 14:6 16:15 18:2,6 21:8,10 26:7,13,16 26:20 boxes 21:3 break 9:9,11,13,14 24:13 breaks 9:5,8 businesses 19:3 C C 3:1 CA 3:17 cafes 15:17 California 1:16 3:12 5:1,7 6:8 28:4 call 18:12 called 5:22 campuses 15:18 CAPTION

29:4	21:16	25:13,22	currently
car	CLR	contrary	12:4
26:13	1:25	16:24 17:9	
case	coffee	conversion	D
1:9,10 2:9,10 11:4	12:16 13:3,8,17,20	15:1	D
29:4	13:23 14:4 17:15,20	copy	4:1
center	18:4 26:20	10:20 18:9 27:15,18	data
21:11	college	cordless	19:13 20:13,18 21:22
centers	15:18	21:2	DATE
21:3	column	correct	30:24
certainly	15:1 20:19	7:18,21 8:17,25	day
6:15 8:3,12 11:3	combination	10:25 11:8,15 14:14	28:17 29:17
CERTIFICATE	13:7,16,20 18:2,6	14:17 19:25 20:10	DC
29:1	23:11,19 24:7	20:15,23 21:15 22:4	3:9
CERTIFICATION	combinations	22:21 23:17 24:1	de
28:1	14:5 16:15 18:5 25:5	corrections	1:15 2:21 3:14 4:2
Certified	commencing	29:12	5:21 6:3,6,18 24:19
2:23,25 5:6	2:20	correctly	26:6 29:22 30:25
certify	communicate	12:19 15:12,14,19,22	dealt
28:4,11	8:24 9:3,4	Costa	25:3
cetera	computers	18:6,13,17,19 19:11	declaration
19:9,18 22:20 23:14	21:1	19:20,23 20:8,11,16	10:15,19 11:3,7,10
24:10	concluded	21:7,10,15,17 22:6	11:12,14,14,18,21
change	27:19	22:12,16 23:4,15,18	12:4,6,7,10 13:13
10:4 26:15 30:2,4,5,7	conclusion	24:1 26:10	14:1 16:22 17:3,8,8
30:8,10,11,13,14,16	26:14	Costa's	17:11,24 24:21,24
30:17,19,21,22	conclusions	13:7,16	25:15 26:7
changes	26:18	Costa-Requena	declarations
29:12,15	conference	18:12	7:8 12:3 14:4
chat	6:10,13	counsel	declare
10:20 14:9 18:8 27:7	confirm	8:25 9:4,22 10:10	29:8
check	24:20	couple	defined
25:9	confuse	26:2	18:25
Chicago	20:1	course	deployed
3:5	confuses	13:22 23:22,23	21:11
cited	8:1	Court	deployment
25:6,14	connectivity	5:5 6:7 7:6 24:15	15:16,20
cites	19:17 22:1,6,9,10,14	26:25 27:6,14	DEPONENT'S
21:10	22:19,23	cover	1:16
clarification	considered	7:13 11:5	deposition
7:4 8:2,7	24:23 25:9	Crane	1:15 8:17 9:19 10:11
clear	consistent	1:25 2:23 5:6 28:3,22	10:14 27:19 29:9,13
14:11,20	21:24	CROSS-EXAMIN...	30:1
close	contained	6:1	described
9:14	11:17 12:4	CSR	16:14 17:19 26:11
closer	context	1:25 5:7 28:3,22	describes

20:11 designed 18:24 19:2,21 20:9 20:12 devices 6:21 19:4,12 20:25 21:4,22 different 7:10 26:16 digital 21:2,11 digits 7:19 directly 23:18 disappear 6:16 discloses 17:4 19:20 20:8,16 21:7 23:15 disclosing 17:5 19:23 discussed 10:18 16:10 25:6 discussing 21:9 22:24 discussion 12:22 18:3 document 11:1 doubts 8:13 Dr 11:20 12:8 13:11,11 13:12,19 16:14,24 17:8,11,20,24 18:1 18:6 25:6,13,16,23 26:12,21 drawbacks 13:4 Drive 3:4 drop 18:8 dropped 12:20	drops 6:12 duly 5:23 E E 3:1,1 4:1,6 e.g 16:5 earlier 10:18 either 26:24 electronic 6:21 20:25 element 22:23 elements 22:8 entire 29:9 environment 19:13,14 20:13,16 21:21,24 environments 19:3,16,22 20:10,14 20:19 22:1,5,14,15 22:18,22 23:1 equally 14:4 18:5 Erik 1:15 2:21 4:2 5:21 6:6 29:22 30:25 ERRATA 29:13 30:1 ESQ 3:3,7,11,16 et 19:9,18 22:20 23:14 24:10 Ethernet 23:12 24:8 everybody 24:14 exact	24:5 exactly 20:6 EXAMINATION 4:2 26:4 example 18:4 21:10 22:9 23:8 23:10 24:6 26:20 examples 22:22 23:1 exchange 19:12 20:13,18 21:22 exemplary 16:24 exhibit 10:20,24 14:8,9,10 14:13,14,16,25 18:9 18:11 exhibits 7:3 27:7 expert 13:13 expressed 12:5 extend 13:22 extent 11:22 F fair 8:5 11:16,19 12:2 16:9,18 19:20 25:20 familiar 25:3 filed 11:12 12:3 financially 28:14 fine 9:12 firm 5:14 first 5:23 12:12,20 16:1,3 19:8,10	five-minute 24:12 Floor 3:17 focus 17:3,7 focusing 17:14 follows 5:23 form 8:20 13:9,18 14:2 16:21 17:17,25 24:4 25:19 forth 28:7 found 13:2 FREEWHEEL 1:5 2:5 29:4 freeze 6:16 front 15:4 full 7:19 27:18 further 25:25 26:22,23 28:11 G generally 17:19 20:2 Getzelman 3:3 4:3 5:10,10 6:2,6 13:10,14,24 14:7 17:1,7,22 18:7 19:23 24:11,18 25:24 26:23 27:12 given 27:10 goes 26:19 going 14:8 18:8 24:13 good 5:5 6:3,6 27:6,14
---	---	--	---

gotten 7:20 grounds 11:20 12:8 25:7,23 guess 23:3 guys 27:8	I Iglesia 1:15 2:21 3:14 4:2 5:21 6:3,7,18 24:19 26:6 29:22 30:25 Illinois 3:5 in-depth 25:17 include 13:25 20:15 included 18:3 22:4 includes 19:15 20:22,25 21:23 including 19:3,17 22:19 indicated 29:13 infrared 23:13,22 24:9 INTENT 29:4 Inter 7:10 interested 28:13 internet 19:4 IPR 7:12 11:17 IPR2024-00421 1:9 2:9 11:5 IPR2024-00422 1:10 2:10 11:5 IPRs 7:10 11:8 25:11 IQ 29:4 issued 14:12 issues 7:15	James 3:16 5:13 Jim 27:2 Jmilkey@raklaw.c... 3:18 Job 1:24 29:3 jukeboxes 21:3	Lett's 11:20 12:3,8 13:11 13:15,19 16:24 17:3 17:8,11,20,24 18:1 18:6 25:13,16,23 26:7 light 13:3 limited 13:8,17 17:15 line 20:20 30:2,5,8,11,14 30:17,19,22 list 20:18,18,21,22,24,25 22:2,3 listed 24:22 listing 22:24 lists 23:20 little 21:16 LiveNote 2:25 LLC 29:5 LLP 3:15 local 19:13,14,21 20:13,14 20:16 21:8,20 located 7:5 location 1:16 16:5,7 26:17 locations 15:11 logged 16:8 long 10:3 look 21:16 looked
H H 4:6 half 24:13 hand 28:17 happening 6:25 head 8:11 heard 8:5 hereof 29:14 hereunto 28:16 history 25:1 home 7:6 19:3,15 21:23 22:13 hope 18:12 hotshots 19:18 hotspot 12:17 16:10,11,19,20 16:23,24 17:6,12,20 20:15 21:14 26:8,10 26:16 hotspots 13:7,16 17:15,19 20:23 22:3,20,25 hour 9:14 10:4,4 24:13	J 	K Kabat 3:15 5:14 Kim 5:6 Kimberly 1:25 2:23 28:3,22 kitchen 6:23 know 9:9,12,13 10:21 14:9 18:9 25:2 27:9	
		L la 1:15 2:21 3:14 4:2 5:21 6:3,6,18 24:19 26:6 29:22 30:25 LAN 19:1 Lane 3:12 language 21:17 24:5 Laurel 6:7 7:6 law 5:14 let's 17:3 20:1 21:16 24:24 Lett 12:17 13:3,11,12 16:14 25:6 26:12,15 26:21	

25:13 looking 7:2 looks 11:3 15:13 Los 3:17	16:4 messages 16:6 Met 9:22 metropolitan 15:11 Milkey 3:16 4:4 5:13,13 9:24 9:25 10:9 13:9,18 14:2 16:21 17:17,25 24:4 25:19 26:1,5 26:22 27:4,9,15,17	network 19:11,21,24,24 20:1 20:4,7 21:5,12,22 22:10,12,17 23:10 23:10,16,25 24:6 networking 19:12 20:5 23:12,13 23:20,22 24:8,9 networks 15:16 20:9,12,12,17 20:25 21:8,13 nodding 8:11 non-obviousness 13:22 non-radio 23:23 note 14:24 number 5:7 7:11,18 25:4,4,5 numbering 20:20 numbers 7:12 11:4 numerous 12:15 NW 3:8	obviously 25:1 obviousness 26:15 offer 29:14 OFFERED 4:7 offering 12:17 office 1:1 2:1 19:15 21:23 okay 7:4,7,16 8:9 9:8 10:18,22 11:4,10 12:9,11,14,24 14:8 14:19,23 15:4,7 18:8 20:14 24:14 25:24 26:14 27:6,14 once 7:3 10:1,2 open 10:21 14:9,10 18:10 opinions 11:16,20,23 12:2,5,7 18:4 25:16 opposed 17:20 outcome 28:13 outside 13:12 16:21 17:23 Owner 1:8 2:8 3:14 5:15 owners' 7:9
M			
Madrone 3:12 Magna 1:24 29:3 manner 12:17 March 1:17 2:20 5:1 28:17 marking 10:24 markings 14:25 15:3 marriage 28:13 material 11:23 25:5,14,22 materials 10:13 24:20,23 25:9 matter 28:14 29:10 media 1:5 2:5 21:2,11 29:4 medium 23:23 meet 9:25 10:5 meeting 10:3,6 memorized 7:20 memory 10:8 19:1 24:25 mention 26:6,10 merely 8:10 message	minute 14:23 missing 9:16 moment 24:11 Monday 1:17 2:20 5:1 monitor 7:2 morning 5:5 6:3,6 10:8 Mountain 1:16 5:1 6:7,8 7:6 move 23:3 MP3 21:3 Mu 3:7 5:16 multiple 19:21 20:9	O	P
	N 3:1 4:1 name 5:5,10 6:4 nearby 6:22 need 9:9 12:13 27:10,13 27:17	o0o 5:3 oath 2:22 8:16 29:15 Object 17:25 24:4 Objection 13:9,18 14:2 16:21 17:17 25:19 objections 13:21,25 14:3 objects 8:20 obvious 12:16,23 13:2,4	once 7:3 10:1,2 open 10:21 14:9,10 18:10 opinions 11:16,20,23 12:2,5,7 18:4 25:16 opposed 17:20 outcome 28:13 outside 13:12 16:21 17:23 Owner 1:8 2:8 3:14 5:15 owners' 7:9 page 4:2 11:2,5 30:2,5,8 30:11,14,17,19,22 paged 11:2 paragraph

12:9,11,14,25 13:1 14:19,21,22,23,24 15:4,7,14,24,25 16:3,4,10,13,18,19 17:5 18:20,21,23 19:6,7,10 20:21 21:18,19 22:11,16 23:3,5,7,9 24:6	petitioners 13:12 Petitioners' 13:6 petitions 25:18 phone 6:23,25 phones 21:2 place 28:6,7 places 26:11 plan 9:8 play 19:1,24 20:7,12,17 20:24 21:4,12,13,22 21:24 22:6 23:10 please 5:8 6:4,16 8:2,13 9:9 9:17 12:9,14 14:9 14:17 18:9 plug 19:1,24 20:7,11,17 20:24 21:4,12,13,21 21:24 22:6 23:10 popularity 15:9 POSITA 13:2 20:2 26:12 post 16:6 posted 16:6 potential 20:19 powerline 23:13,22 24:9 practice 9:7 preparation 24:21 prepare 9:18,21 10:10,13	present 11:21 prevent 7:23 previous 12:22 primarily 25:15 proceeding 28:6,9 proceedings 11:12,17,24 28:8 Professional 2:24 proposed 26:12,15 prosecution 25:1 provide 8:9 9:11 19:16 22:1,6 22:10,14,18,23 provided 20:21 provides 22:2 providing 7:24 22:8 public 15:10,16,20 19:3,18 20:15,22 21:14 22:3 22:20,25 26:8,16 Publication 18:15 pull 10:22 put 10:20 14:8	quick 26:2 R R 3:1 rationale 13:21 rationales 14:1 read 12:19,24 15:12,13,19 15:20,21 16:1,18 18:22 19:8 21:19 23:6 26:25 27:2,18 29:9,11 reading 18:14 reads 16:4 23:9 reanswer 8:14 Reason 30:4,7,10,13,16,21 reasons 12:15 recall 7:12 26:6 recess 24:17 recognize 11:1 14:10 18:11 record 5:9 6:5 7:1 12:25 16:2 18:22 19:8 23:6 27:11,13 redirect 26:2,4 refer 7:16 11:10 14:14,17 18:16 reference 16:11,12,20 17:23 18:12,19 22:7,16 referenced 16:23
---	--	--	---

references 18:3	15:5,6	11:4,6 15:8 24:24 26:9	7:13 29:17
referencing 17:12	rereading 12:13	seen 25:12	silent 6:24
referred 7:16	respect 11:20 12:22	sentence 12:21,21,25 13:1 15:7,14,15,21 16:1 16:3 18:23 19:10 23:7,9	similar 19:11 20:5,6
referring 7:18 11:11 14:15 18:14	responding 13:11	sentences 19:9	sir 14:20 27:1
reframe 12:1	responses 7:9	serves 10:8 19:1	skyrocketed 15:17
regarding 6:10 8:25 9:4 10:19 26:14	responsive 11:23 12:7 25:15,16	service 12:17 16:5	sorry 20:20
regards 22:12	review 10:13 13:13 25:10	set 28:7,16	sort 7:2,2 9:13,14
Registered 2:24	reviewed 10:15 24:20 25:4,21	set-top 14:5 16:15 18:2,6 21:3,8,10 26:7,13 26:16,19	Sounds 27:14
rejoins 6:14	Reviews 7:10	settings 15:11	South 3:4
related 7:10 28:11	right 6:19 7:5 10:24 16:18 17:3 18:18 26:1	seven 7:19	space 26:20
relevant 11:24 18:5 21:4 25:22	rising 15:8	shaking 8:10	spaces 19:4
remind 9:17	room 6:19,22	Shambhavi 3:11 5:18	spatel@bannerwit... 3:13
REMOTE 1:15	RPR 1:25 28:3,22	sheet 7:13 29:14 30:1	speak 10:9
remotely 2:22	Russ 3:15 5:14	shop 12:16 13:3,21 17:21 18:4 26:21	specific 7:15 17:20 18:3 22:7 22:8
reported 1:25 2:23 28:8	S	shops 13:8,17,23 14:4 17:16	specifics 16:15
reporter 2:24,24,25 5:5,6 24:15 26:25 27:6,14 28:3	Saturday 10:7,8	Shorthand 2:23 5:6	start 6:9
REPORTER'S 28:1	save 29:12	side 14:25	starting 18:23
represent 5:11	saying 21:17	sign 27:1,3,18	state 5:7,8 6:4 12:15 28:4
representing 5:14,17,19	says 15:16 19:11 20:6 21:18,20 23:18	SIGNATURE 30:24	states 1:1 2:1 15:8 22:12,17
required 8:21	scope 16:22	signed	stay 16:6
reread	second 7:1 15:7,13 18:22		STB 12:16 13:2,7,16
	see		stenographically 2:22 28:9
			sticker 10:23

Street 3:8 strike 22:15 studying 25:2 stuff 12:13 submitted 7:8 11:8 13:13 25:10 25:18 suggestion 13:20 suggests 12:18 13:3 Suite 3:4,8 support 7:9 11:12 sure 14:12 16:3 24:15,25 sworn 2:22 5:23 sync 14:18 systems 21:1	23:16 telephones 21:1,2 televisions 21:1 tell 6:16 8:4,13 terms 13:20 testified 5:23 testimony 7:24 8:25 9:4 28:8 Thank 7:4,22 8:15 13:5 15:15,23 17:13 18:16 19:5,19 21:6 23:2,15,24 24:11 25:24 THEREOF 28:16 think 10:7,7 11:19 15:21 18:13 21:19 25:12 25:20 26:12,13 27:4 27:17 third 23:6,9 time 9:16 12:6,12 16:7 25:25 28:7 times 9:25 25:4,5 today 6:11 7:7,14,24 8:24 11:23 today's 8:17 9:18 TRADEMARK 1:1 2:1 transcript 27:1,3,16 29:9 trend 15:8 TRIAL 1:3 2:3	true 29:11 trust 7:20 truthful 7:24 turn 12:9 14:19 15:24 18:19 19:5 two 7:10,12 19:8,10 typically 19:14 21:23	V v 1:6 2:6 verbal 8:9 video 6:10,13 View 1:16 5:1 6:8 VS 29:4
T T 4:6 take 9:5,8,11 24:12 taken 24:17 29:10 talk 11:13 talking 7:14 tea 9:14 technologies 15:9 23:12,20,21,25 24:8 technology 15:10 19:2,12 20:5		U U.S 7:11,18 understand 7:7,13,17 8:16,19,23 9:1,2 11:11,22 13:19 14:15 22:11 understanding 9:6 13:6,15 29:14 understood 8:5 11:25 UNITED 1:1 2:1 universal 19:1 20:11,17,24 21:12,13,21 UPn 20:4 UPnP 18:23,25 19:11,16,23 22:1,12,14,16,18,23 23:10,15,25 24:6 use 27:7 user 16:8 users 16:5 utilize 23:11,16,19 24:1,7 utilized 21:14	W Wacker 3:4 wait 6:13 15:5,5 want 27:2 Washington 3:9 wasting 12:12 water 9:13 way 7:2 we're 6:10 7:14 10:18 11:13 12:12 22:24 we've 21:9 Welcome 24:19 Wi-Fi 12:17 13:7,16 15:10 15:16 17:15 20:15 23:13,17,21 24:1,9 Wilshire 3:16 wired 23:11,19 24:7 wireless 15:9 19:18 20:22 21:14 22:3,20,25

23:11,16,20,21,23 24:7 Witcoff 3:3,7,11 5:11,17,19 witness 5:15,22 13:10,19 14:3 16:23 17:18 18:1 24:5,16 25:20 27:2 28:16 29:1 wonderful 9:15 work 19:2,21 20:9 Works 24:16 wrote 12:6 WU 5:16	14:8,16 1011 18:9,11 104 19:11 20:4 22:12,17 23:11,16 24:1,6 110 19:13,14 20:17 21:21 1100 3:8 11594 1:25 2:24 5:7 28:22 1200 3:8 12424 3:16 126 15:24,25 16:1,4,4,10 16:24 1293856 1:24 29:3 12th 3:17 13th 3:8 28:17	7:14,17 3 302 3:12 310 3:18 312 3:5,9 36 19:6,7,10 20:21 21:18,19 22:11,16 3600 3:4 37 14:19,20,21,22,24 15:4,7,14 23:3,5,7,9 24:6 38 12:9,11,14,25 13:1 4 4 20:19 400 6:7 7:6 463-5000 3:5 463-5438 3:9 5 6 6 4:3 18:20,21,23 60606 3:5 7 7 14:10,13 7,861,220 1:10 2:10 7,861,260 7:11,18	71 3:4 8 802.11 23:12,21 24:8 824-3000 3:13 826-7474 3:18 9 9:00 2:21 5:2 9:44 27:19 90025 3:17 93311 3:12
X X 4:1,6 X10 23:13,22 24:9 Y yeah 27:4,4,12 yellow 10:23 yes-or-no 17:2 24:3 Z Zachary 3:3 5:10 zgetzelman@bann... 3:6 0 1 10 1:17 2:20 5:1 1007	2 2:00 7:3 20 29:18 20005 3:9 2001 10:20,24 2006/0128364 18:15 2008/0113674 14:13 202 3:13 2025 1:17 2:20 5:1 28:17 26 4:4 260		