

In the Matter Of:

Juniper Networks vs

Monarch Networking

ALEXA MORRIS

October 22, 2024



1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 * * *

3 BEFORE THE PATENT TRIAL AND APPEAL BOARD

4 * * *

5 JUNIPER NETWORKS, INC.,
6 Petitioner,

7 v.

8 MONARCH NETWORKING SOLUTIONS LLC,
9 Patent Owner.

10 * * *

11 Case IPR2024-00485

12 Patent 8,451,844

13 * * *

14 VIDEOCONFERENCED AND VIDEO-RECORDED DEPOSITION OF

15 ALEXA MORRIS

16 Mountain View, California

17 Tuesday, October 22, 2024

18 12:07 p.m.

19
20 Pursuant to notice, pursuant to the
21 Code of Federal Regulations and
22 Federal Rules of Civil Procedure,
23 before April L. Crites, RMR, CRR, CSR, CCR,
24 and California Certified Shorthand Reporter,
25 CSR No. 14493.

Page 2				Page 4			
1	I N D E X			1	THE VIDEOGRAPHER: We are now on the video		
2	EXAMINATIONS CONDUCTED			2	record. This is the video deposition of		
3	ALEXA MORRIS		PAGE	3	Alexa Morris in the matter of Juniper Networks,		
4	Cross-Examination by Mr. Collier.....		5	4	Inc., vs. Monarch Networking Solutions, LLC, in		
5	Cross-Examination by Mr. Briggs.....		30	5	the United States Patent and Trademark Office		
6				6	before the Patent Trial and Appeal Board,		
7				7	Case IPR2024-00485.		
8	INDEX TO EXHIBITS			8	This deposition is being taken via Zoom		
9	MARKED	DESCRIPTION	PAGE	9	web-conferencing, where the deponent, counsel, and		
10	Exhibit 1007	Declaration of Alexa	23	10	court reporter are attending the deposition via		
11		Morris, Simultaneous		11	Internet connection from their separate locations,		
12	Exhibit 1009	Invention Act		12	on October 22, 2024, at 12:07 p.m. Eastern time.		
13		Declaration of Alexa	10	13	I'm Pedro Diaz, the videographer. The		
14		Morris, Staging Folder		14	court reporter is April Crites. We're from the		
15	Exhibit 2014	Notice of Deposition	7	15	firm Lexitas.		
16				16	Counsel will now introduce themselves,		
17	* * *			17	beginning with the questioning attorney.		
18				18	MR. COLLIER: This is Wills Collier of		
19				19	Heim Payne & Chorush for the patent owner,		
20				20	Monarch Networking Solutions.		
21				21	MR. BRIGGS: This is Todd Briggs, and with		
22				22	me is Chris Sabbagh. We're from the firm of		
23				23	Quinn Emanuel, and we are representing the		
24				24	petitioner in this IPR, Juniper Networks.		
25				25	MR. SPIEGEL: Ryan Spiegel of the law firm		

Page 3				Page 5			
1	APPEARANCES:			1	Thompson Hine representing IETF and the witness,		
2	ON BEHALF OF THE PETITIONER, JUNIPER			2	Ms. Morris.		
3	NETWORKS, INC.:			3	THE VIDEOGRAPHER: Okay. Thank you.		
4	QUINN EMANUEL URQUHART & SULLIVAN, LLP			4	Will the court reporter swear in the		
5	By: Todd M. Briggs, Esq.			5	witness? Thank you.		
6	Christopher Sabbagh, Esq.			6	ALEXA MORRIS		
7	555 Twin Dolphin Drive			7	of lawful age, Witness herein, having been first		
8	Fifth Floor			8	duly cautioned and sworn, as hereinafter		
9	Redwood Shores, California 94065			9	certified, was examined and said as follows:		
10	650-801-5000			10	CROSS-EXAMINATION		
11	toddbriggs@quinnemanuel.com			11	BY MR. COLLIER:		
12	chrissabbagh@quinnemanuel.com			12	Q Good morning, Ms. Morris. How are you		
13	ON BEHALF OF THE PATENT OWNER, MONARCH			13	doing today?		
14	NETWORKING SOLUTIONS, LLC:			14	A I'm doing well, thank you.		
15	HEIM PAYNE & CHORUSH, LLP			15	Q Thanks for being here. As I said a second		
16	By: William B. Collier, Jr., Esq.			16	ago, my name is Wills Collier. I'm counsel for		
17	609 Main Street			17	Monarch Networking Solutions in this IPR, and I'll		
18	Suite 3200			18	be taking your deposition today on behalf of		
19	Houston, Texas 77002			19	Monarch.		
20	713-221-2000			20	Could you please state your full name for		
21	wcollier@hpccllp.com			21	the record?		
22	ON BEHALF OF IETF ADMINISTRATION LLC AND THE			22	A Sharon Alexa Morris.		
23	DEPONENT, MS. ALEXA MORRIS:			23	Q Have you been deposed before, Ms. Morris?		
24	By: THOMPSON HINE LLP			24	A Once.		
25	Ryan S. Spiegel, Esq.			25	Q What type of case were you deposed for?		
	1919 M Street, NW						
	Suite 700						
	Washington, D.C. 20036-3537						
	202-973-2742						
	ryan.spiegel@thompsonhine.com						
	ALSO PRESENT:						
	PEDRO DIAZ, Lexitas Videographer						
	* * *						

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1 A A case similar to this. 2 Q Approximately when was that deposition? 3 A I believe it was in 2020. 4 Q So I'm sure when you took that deposition, 5 you know, the attorneys laid out some ground 6 rules, so you might be familiar with them, but I'm 7 going to just go ahead and go through them again. 8 A Mm-hmm. 9 Q So if I ask you a question that you don't 10 understand, could you please ask me to clarify it? 11 A Yes. 12 Q Okay. And if you don't ask me to clarify 13 a question, is it fair to assume that you 14 understood my question? 15 A Yes. 16 Q So could you also please make sure to 17 provide verbal answers to any of my questions so 18 the court reporter can transcribe them? 19 A Yes. 20 Q Is there anything, for example, medication 21 or illness, that would prevent you from testifying 22 accurately and honestly today? 23 A No. 24 Q And finally, if you need a break, just let 25 me know. We can always take a break as long as	1 A Yes. 2 Q And do you understand that your testimony 3 could be used during this IPR? 4 A Yes. 5 Q Did you do anything to prepare to testify 6 today? 7 A I reviewed Exhibits 1007 and 1009, and I 8 also briefly reviewed the transcript of my 9 previous deposition to remind myself of the 10 format. 11 Q Did you do anything else? 12 A No. 13 Q Did you meet with any attorneys to prepare 14 for your deposition? 15 A Oh, I did meet with our own IETF attorneys 16 yesterday, yes. 17 Q Other than the IETF attorneys, did you 18 meet with any other attorneys to prepare for 19 today? 20 A No, I did not. 21 Q Are you being compensated for your 22 testimony today? 23 A No. 24 Q Where do you work, Ms. Morris? 25 A Where do I work? Sorry?
Page 7	Page 9
1 there's not a pending question. 2 A Thank you. 3 Q I'll try to take a break every 30 minutes 4 or so, maybe every hour, but I don't think we'll 5 go for very long today. 6 A Okay. 7 MR. COLLIER: Could we please bring up 8 Exhibit 2014? 9 (Deposition Exhibit 2014, Notice of 10 Deposition, was marked and presented for purposes 11 of identification.) 12 BY MR. COLLIER: 13 Q Ms. Morris, have you seen this document 14 before? 15 A I don't know. 16 MR. COLLIER: Could you please scroll to 17 the second page? 18 BY MR. COLLIER: 19 Q Does this document look familiar? 20 A No. 21 Q That's okay. It's simply the notice of 22 deposition -- for your deposition today. 23 A Mm-hmm. Okay. 24 Q Do you understand that you're here today 25 to testify under oath?	1 Q Yes. Where do you work? 2 A I work for Association Management 3 Solutions, and we are the secretariat for the 4 IETF -- with the IETF. 5 Q You said you're the secretariat for the 6 IETF? 7 A Yes, we are the secretariat for the IETF. 8 Q What does that mean? 9 A It means that we provide administrative 10 support and other services for the IETF. 11 Q So you're not directly employed by the 12 IETF? 13 A We are technically contractors, but we are 14 employed as contractors for the IETF. 15 Q And what is your role for -- at Associate 16 Management Solutions? 17 A I am -- can I -- can I ask a question? 18 Q Sure. 19 A I think you were asking me what my role is 20 really with the IETF or -- 21 Q I'll rephrase my question. 22 A Okay. 23 Q So what is your role with the IETF? 24 A Okay. Currently, I work on special 25 projects with the IETF in a part-time basis, but

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1 prior to April of this year, I was the managing 2 director of the IETF secretariat. 3 Q How long were you the managing director 4 for the IETF secretariat? 5 A I was the managing director since the IETF 6 LLC was formed in 2018, and prior to that, I was 7 the executive director, since January of 2008. 8 The roles were the same; the titles changed. 9 Q Have you had -- have you had any other 10 roles at the IETF than -- other than those 11 two roles? 12 A No, I have not. 13 Q And -- excuse me -- 14 MR. COLLIER: All right. Let's bring up 15 Exhibit 1009, please. 16 (Deposition Exhibit 1009, Declaration of 17 Alexa Morris, Staging Folder, was marked and 18 presented for purposes of identification.) 19 MR. COLLIER: And can you scroll to 20 page 3? 21 BY MR. COLLIER: 22 Q Ms. Morris, do you recognize this 23 document? 24 A Yes, I do. 25 Q What is it?	1 January 17, 2024, correct? 2 A Yes, that is correct. Thank you. 3 MR. COLLIER: So can we scroll to 4 paragraph 10, please, of this declaration? 5 Up. It's page 2. 6 BY MR. COLLIER: 7 Q Ms. Morris, you see at the beginning of 8 paragraph 10, your declaration states Exhibit 1 is 9 a true and correct copy of the publication, it's 10 got a document name, and then that paragraph goes 11 on to describe the document? 12 MR. SPIEGEL: Objection to the 13 characterization of the document. 14 Counsel, did you say it goes on -- it 15 describes a publication? That was my objection. 16 MR. COLLIER: I believe I said it goes on 17 to describe the document. 18 MR. SPIEGEL: Okay. Well, I'm objecting 19 to the characterization of it describing a, quote, 20 publication. 21 BY MR. COLLIER: 22 Q Let me rephrase my question, Ms. Morris. 23 So in this document -- in this first 24 sentence, paragraph 10, you refer to an Exhibit 1, 25 correct?
Page 11	Page 13
1 A It is a declaration that I signed. 2 Q Is it one of the declarations you signed 3 for this case? 4 A Yes. I believe so, yes. 5 Q Who asked you to sign this declaration? 6 A The Thompson Hine legal counsel. 7 Q Did anyone from Juniper ever contact you 8 about this declaration? 9 A No. 10 Q What about any attorney representing 11 Juniper? 12 A No. 13 Q So you signed this declaration on 14 January 17, 2004 [sic], correct? 15 A Yes. 16 Q Have you ever signed similar declarations? 17 A Similar -- similar how? 18 MR. SPIEGEL: I'm sorry, Counsel. Sorry 19 to interrupt. Did you say January 17, 2004, or 20 2024? 21 MR. COLLIER: I'm sorry. I meant to say 22 2024. 23 BY MR. COLLIER: 24 Q Let me just get that clear. 25 You signed this declaration on	1 A Yes. 2 Q And then the rest of that paragraph goes 3 on to discuss that document, correct? 4 A Yes. 5 Q Have you ever signed similar declarations 6 discussing IETF documents? 7 MR. SPIEGEL: Objection to the form, but 8 you can answer if you understand the question. 9 THE WITNESS: I would like to ask for a 10 clarification. 11 This -- and -- and I will explain what 12 I -- what my question is. 13 This declaration is unusual in that it 14 refers to an unpublished Internet-Draft, and in 15 all previous declarations that I can recall, I 16 have signed declarations referring to published 17 Internet-Drafts, so it is unique in that way. But 18 the format of the declaration is very similar to 19 other declarations. 20 Q Okay. Do you have a sense of how many 21 declarations you have signed related to published 22 Internet-Drafts? 23 A I'm not sure, but probably 60, at least, I 24 guess, over the years. 25 Q So since we're on the topic of

Page 14	Page 16
1 Internet-Drafts, let's go up to paragraph 5, 2 please, at the bottom of page 1. 3 What is an Internet-Draft, Ms. Morris? 4 A An Internet-Draft is a working document of 5 the IETF. They're basic work items. 6 Q And what do you mean by a "work item"? 7 A I mean that anyone can author an 8 Internet-Draft, and then they are published online 9 publicly, and they become -- potentially, they can 10 become standards of the IETF, but an 11 Internet-Draft itself is just a document that is 12 something that might become a work item for the 13 organization. 14 Is that clear enough? 15 Q I think so. 16 How is an Internet-Draft created? 17 A They authorize the document, and it can be 18 about anything, and then using the tool online, on 19 the IETF website, post the document to a public 20 directory. 21 Q Does that tool have a name? 22 A The Datatracker. 23 Q Can anyone submit a document to the 24 Datatracker? 25 A Yes, anyone can.	1 A Yes, that is correct. 2 Q The public archive that published 3 Internet-Drafts are deposited into, does that have 4 a name? 5 A I believe it's the Internet-Draft 6 Repository. I don't know if it actually has an 7 official name, to be honest. 8 Q Are all documents submitted to the -- 9 excuse me. Scratch that. 10 Are all documents submitted to the 11 Datatracker published by the IETF? 12 A Can I take that question apart? Are 13 you -- a bit? Are you -- I believe you're asking 14 if every document that is submitted to the IETF -- 15 to the Datatracker becomes public? Or what is -- 16 can you clarify -- can you rephrase that question, 17 or just ask the question one more time? 18 Q Sure. I'll ask one version of it. 19 Is every document submitted to the IETF 20 Datatracker public? 21 A No. 22 Q What documents are not public? 23 A Documents -- I don't know all of them, but 24 an example is a document that is canceled by the 25 author after they initially submit it.
Page 15	Page 17
1 Q So you mentioned that the -- these 2 Internet-Drafts are published online, right? 3 A Yes. 4 Q What do you mean by "published"? 5 A I mean that they are made -- that they are 6 the -- the drafts are deposited into a public 7 archive, and they are announced to a specific 8 e-mail list, and they're available for anyone to 9 see. There's no paywall. There's no membership 10 required. 11 Q And does that only happen to published 12 Internet-Drafts? 13 A That they're announced via an e-mail list, 14 or which part of that? 15 Q Let me rephrase that. 16 So are all Internet-Drafts deposited into 17 this public archive you mentioned? 18 A All published Internet-Drafts are 19 deposited into the public archive. 20 Q Okay. 21 A They are -- if they are officially 22 published. 23 Q And only -- am I right in understanding 24 that only published Internet-Drafts are announced 25 to the e-mail list?	1 MR. COLLIER: Can we go to paragraph 10 of 2 your declaration, please? 3 THE WITNESS: Mm-hmm. 4 BY MR. COLLIER: 5 Q So in the first sentence of 6 paragraph 10 -- I think I mentioned this 7 earlier -- you state that Exhibit A -- excuse me. 8 Let me get that clean. 9 The first sentence of paragraph 10 states 10 that Exhibit 1 is attached to your declaration, 11 right? 12 A Mm-hmm. 13 Q And you state that that Exhibit 1 is a 14 document titled -- sorry, Bidirectional Address 15 Borrowing (IVI) -- 16 A Mm-hmm. 17 Q -- et cetera. 18 MR. COLLIER: Can we scroll down to 19 page 5? Can we go to page 5 of the exhibit, 20 please? 21 BY MR. COLLIER: 22 Q Is this document that begins on page 5 of 23 Exhibit 1009, the document you mentioned in 24 paragraph 10? 25 A Yes, I believe so.

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1 Q So the parties have been calling that 2 document Li-2 in this IPR. 3 Can we refer to it as Li-2 today? 4 A Sorry, can we refer to it as what? 5 Q Li-2, L-I-dash-2. 6 A Oh, sure. Okay. 7 Q I don't think I'll go into the details of 8 it, but it will be a little bit quicker if we use 9 that phrase instead. 10 A I understand. 11 MR. COLLIER: All right. So let's go back 12 up to paragraph 10, please. 13 BY MR. COLLIER: 14 Q So in paragraph 10, in your first 15 sentence, you state that Li-2 is an unpublished 16 Internet-Draft, correct? 17 A Yes. 18 Q What does it mean to be an unpublished 19 Internet-Draft? 20 A It means it is not an official 21 Internet-Draft of the IETF. 22 Q And so that means it was never announced 23 in an e-mail to the IETF community? 24 A That is correct. 25 Q What happens to unpublished	1 Q In the second sentence of paragraph 10, 2 you stated, quote, When initially submitted, the 3 document, Li-2, was in the Internet-Draft staging 4 directory. 5 Correct? 6 A Correct. 7 Q What is the staging directory? 8 A It is a directory that holds drafts that 9 are pending until they are published. 10 Q How long do documents -- can documents 11 stay in the staging directory? 12 A I don't know. 13 Q Has IETF ever removed documents from the 14 staging directory? 15 A Well, the staging directory actually no 16 longer exists. It existed as of this declaration, 17 but it -- it does no longer exist now. 18 Q When did the IETF eliminate the staging 19 directory? 20 A Earlier this year as a part of an internal 21 reorganization and cleanup that's totally 22 unrelated to this. 23 Q Prior to eliminating the staging 24 directory, was there any limit on how long a 25 document could stay in the staging directory?
Page 19	Page 21
1 Internet-Drafts? I'm sorry, let me rephrase that. 2 Earlier, you stated that a document 3 submitted to the IETF Datatracker is only -- I'm 4 sorry, let me rephrase -- let me rephrase that 5 again. 6 So you stated earlier that an author of 7 documents submitted to the Datatracker can cancel 8 their submission, right? 9 A Yes. Can I clarify that, actually? 10 Q Please do. 11 A It -- it's -- they actually have to 12 confirm the submission, so it's -- it's not quite 13 that they -- if they don't confirm the 14 submission -- or I think that they can also cancel 15 it -- but they have to take a proactive step once 16 they've submitted it to actually confirm it and 17 publish it. 18 So slight clarification. 19 Q Okay. So without confirming a submission, 20 it will not become a published Internet-Draft, 21 correct? 22 A Yes. That is my understanding, yes. 23 Q Does the IETF enforce any deadlines for 24 confirming a submission? 25 A I believe so. I don't know the details.	1 A I don't believe so. 2 Q Were you -- are you familiar with any of 3 the technical details of how the staging directory 4 was maintained while it still existed? 5 A No. 6 Q Do you know if the staging directory had 7 any code or script that would prevent web crawlers 8 from crawling it? 9 A I don't know. 10 Q Have you ever Googled for the staging 11 directory? 12 A I don't think so. 13 Q When the staging directory did exist, did 14 IETF provide any tools to allow a member of the 15 public to search it? 16 A Not to my knowledge. 17 Q Were there any requirements for naming 18 files that ended up in the staging directory? 19 A Can you restate that question, please? 20 Q Sure. 21 Did the staging directory have any rules 22 for the file names for documents that went into 23 it? Were you required to include a name in the 24 title or something? 25 A There are -- I will answer the question

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1 slightly differently. 2 There are formatting requirements for when 3 you submit a document to be published, so there 4 are format requirements prior to the staging 5 directory, but I don't know about the staging 6 directory, specifically. 7 Q Do you know if those formatting 8 requirements affect how documents are stored -- 9 were stored in the staging directory? 10 A I do not know. 11 Q Let's go down to paragraph 11 of your 12 declaration, Exhibit 1009. 13 In about the middle of the paragraph, 14 there's a sentence that begins with, Nevertheless, 15 to date, the URL remains publicly available in the 16 staging directory, and it goes on to say, And is 17 available as of this declaration at, a URL. 18 Do you see that sentence? 19 A Yes, I do. 20 Q So that URL begins with 21 www.ietf.org/staging, correct? 22 A Mm-hmm. Yes. 23 Q Was that the URL for the staging 24 directory? 25 A Yes.	1 A Can you go to the end, please? 2 Yes. 3 Q What do you recognize it to be? 4 A I recognize it to be a declaration that I 5 signed. 6 MR. COLLIER: If we could scroll to 7 page 3. 8 BY MR. COLLIER: 9 Q You signed this declaration on 10 October 23, 2023, correct? 11 A Yes. 12 MR. COLLIER: Is it possible to put up 13 Exhibit 1007 and Exhibit 1009 side by side? 14 THE VIDEOGRAPHER: Counsel, if you know 15 how to do it, if you could tell me, and I'll do it 16 like you instruct. 17 MR. COLLIER: I might be able to do it 18 from my screen. 19 THE VIDEOGRAPHER: Okay. 20 MR. COLLIER: Give me one moment, please. 21 BY MR. COLLIER: 22 Q Okay. Ms. Morris, can you see my screen? 23 A Yes, I can. 24 Q So on the left-hand side, I have 25 Exhibit 1007, and on the right, I have
Page 23	Page 25
1 Q Has that always been the URL for the 2 staging directory? 3 A I do not know. 4 Q Okay. So you wouldn't know if any other 5 URLs existed for the staging directory? 6 A I don't -- no, I would not know. 7 Q When did the IETF decide to eliminate the 8 staging directory? 9 A I don't know exactly, but my understanding 10 is that it had been planned for a long time. 11 Q Is "a long time" a year? 12 A I think probably more. 13 Q Five years? 14 A I don't know. 15 Q Okay. 16 MR. COLLIER: So let's bring up 17 Exhibit 1007, please. 18 (Deposition Exhibit 1007, Declaration of 19 Alexa Morris, Simultaneous Invention Act, was 20 marked and presented for purposes of 21 identification.) 22 BY MR. COLLIER: 23 Q Ms. Morris, this is your other declaration 24 in this IPR. 25 Have you seen this document before?	1 Exhibit 1009. 2 Do you see that? 3 A Yes, I do. 4 Q So I just want to compare these two 5 documents. 6 So do you agree that paragraph 1 in 7 Exhibit 1007 is identical to paragraph 1 in 8 Exhibit 1009? 9 MR. SPIEGEL: Objection. The documents 10 speak for themselves, but you can answer. 11 THE WITNESS: Yes, it -- they do look to 12 be identical. 13 BY MR. COLLIER: 14 Q And do you agree paragraph 2 is identical 15 between the two documents? 16 MR. SPIEGEL: Same objection. 17 THE WITNESS: They do appear to be 18 identical, yes. 19 BY MR. COLLIER: 20 Q And the same is true for paragraph 3? 21 MR. SPIEGEL: Same objection. Standing 22 objection for the record. 23 THE WITNESS: Clarifying question: If my 24 attorney objects, am I obligated to answer the 25 question, or yes --

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1 BY MR. COLLIER: 2 Q Yes. 3 A Yes, I am. Okay. 4 Yes, they do appear to be identical. 5 Q And, in fact, paragraphs 1 through 9 are 6 all identical, correct? 7 A I'd have to read them each side by side 8 and compare them. 9 Q Would you be surprised if there was 10 different language in between the two documents in 11 those first nine paragraphs? 12 A I would. 13 Q Okay. But let's go to Exhibit -- or 14 paragraph 10. 15 Paragraph 10 is different between the two 16 documents, correct? 17 A Yes. 18 Q So I'll start with paragraph 10 in 19 Exhibit 1007. In that one, you refer to -- excuse 20 me -- an Exhibit 1, correct? 21 A I do. 22 Q And that, you state, is a copy of an 23 announcement of the publication of a document 24 titled Prefix-specific and Stateless Address 25 Mapping, et cetera.	1 Q And you then state, quote, Based on the 2 normal practice of the IETF, that Internet-Draft 3 was reasonably available to the public within 4 24 hours of that announcement. 5 Correct? 6 A Yes. 7 Q And then, finally, you say, quote, At that 8 time, the Internet-Draft would have been 9 disseminated or otherwise available to the extent 10 that persons interested and ordinarily skilled in 11 the subject matter or art, exercising reasonable 12 diligence, could have located it. 13 Correct? 14 A Yes. 15 Q Now, let's turn back to paragraph 10 of 16 Exhibit 1009. 17 So here, you are discussing Li-2, as we 18 mentioned earlier, right? 19 A Yes. 20 Q But unlike the other declaration, you did 21 not state that you determined that there was an 22 announcement of the publication of Li-2, correct? 23 A Correct. 24 Q And you did not state that Li-2 was 25 reasonably available to the public at any point in
Page 27	Page 29
1 Correct? 2 A I do. But I'd like to actually make a 3 small clarification. There is an unintentional 4 clerical error in the -- in this. It is not a 5 copy of an announcement. It is a copy of the 6 publication. 7 Q So Exhibit 1 is a true and correct copy -- 8 A Of -- 9 Q -- of -- 10 A Of the draft. 11 Q -- the publication of that -- 12 A It is of the draft. Yeah. 13 (Overlapping speakers.) 14 BY MR. COLLIER: 15 Q And so in reference to this 16 Internet-Draft, you stated that, in the second 17 sentence, quote, I have determined that an 18 announcement of the publication of this 19 Internet-Draft was made on February 22, 2002 -- 20 I'm sorry, strike that. I misread it. 21 You stated in that second sentence, I have 22 determined that an announcement of the publication 23 of this Internet-Draft was made on July 6, 2008. 24 Correct? 25 A Yes.	1 time, did you? 2 A Correct. 3 Q And you did not state that Li-2 would have 4 been disseminated or otherwise available to the 5 extent that persons reason -- persons interested 6 and reasonably skilled in the subject matter or 7 art, exercising reasonable diligence, could have 8 located it, right? 9 A Correct. 10 MR. COLLIER: I'm going to stop sharing my 11 screen. 12 Okay. I'll pass the witness. 13 MR. BRIGGS: Okay. Can we take a short 14 break and then continue? 15 MR. COLLIER: Fine with me. 16 MR. BRIGGS: Okay. Thank you. Maybe 17 five -- five, ten minutes. 18 MR. COLLIER: Sure. Which one? Five or 19 ten? 20 MR. BRIGGS: Why don't we do ten? 21 MR. COLLIER: All right. Works for me. 22 MR. BRIGGS: Okay. Thank you. 23 THE VIDEOGRAPHER: We're going off the 24 video record. The time now is 12:44 p.m. Eastern 25 time.

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1 Stand-by. 2 (A brief recess was taken.) 3 THE VIDEOGRAPHER: We're going to go back 4 on the video record. The time now is 12:55 p.m., 5 Eastern time. 6 CROSS-EXAMINATION 7 BY MR. BRIGGS: 8 Q Good morning, Ms. Morris. 9 My name is Todd Briggs. I represent 10 Juniper. I just have a few questions. 11 A Okay. 12 Q What is your educational background? 13 A Meaning my -- like, my college education? 14 Q Right. Are you -- do you have a technical 15 degree? 16 A I do not. 17 Q Okay. What is your college degree in? 18 A I have a BA in philosophy and mathematics. 19 Q Do you consider yourself to be a person of 20 ordinary skill in the art in the field of computer 21 networking? 22 A Of ordinary skill? 23 Q Yes. 24 A Is -- 25 Q Or a person of skill in the art of	1 Q Okay. And that staging folder can be 2 accessed through a URL, correct? 3 A Yes. 4 Q Okay. And anyone in the world that has 5 that URL to the staging folder can access 6 documents in the staging folder, correct? 7 A Yes, that is true. 8 Q So in that sense, every document that is 9 put into the staging folder is accessible to the 10 public, right? 11 MR. SPIEGEL: Objection. 12 THE WITNESS: Yes -- 13 MR. SPIEGEL: You can answer. 14 THE WITNESS: I -- yes, that is true. 15 BY MR. BRIGGS: 16 Q Okay. And the document that is subject to 17 your declaration, which is Exhibit 1009 -- and 18 that is the document referred to in paragraph 10 19 of your declaration -- 20 MR. BRIGGS: And maybe we can pull that up 21 really quick. 22 THE VIDEOGRAPHER: Sorry, Counsel. Which 23 one do you want? 24 MR. BRIGGS: Exhibit 1009. And if you 25 scroll down to paragraph 10, this, again, is the
Page 31	Page 33
1 computer networking. 2 A No, I do not. 3 Q Okay. Have you ever worked as a computer 4 networking engineer or anything like that? 5 A No, I have not. 6 Q Earlier today, I believe you testified -- 7 you were asked the question, Is every document 8 submitted to the IETF public? 9 Do you recall that question or a question 10 similar to that? 11 A I do. 12 Q Okay. And I believe your answer was, No, 13 and -- and an example of that is a document that 14 is canceled. 15 Is that -- 16 A That sounds -- yes, I believe I did say 17 that. 18 Q Okay. So I just wanted to follow up and 19 ask a few questions about -- about your answer 20 there. 21 When a document is submitted to the 22 IETF -- and this is in the past, including in 23 2008 -- that document first landed in a staging 24 folder, right? 25 A Yes. That's my understanding.	1 exhibit that is Ms. Morris' declaration from 2 January of 2024. 3 BY MR. BRIGGS: 4 Q And this -- this refers to Exhibit 1, 5 which was submitted on June 21, 2008. 6 Do you see that? 7 A Yes, I do. 8 Q Okay. And you state, When initially 9 submitted, the document, Bidirectional Address 10 Borrowing (IVI), and then it has the -- the name 11 of the file, draft-xli-ivi-00.txt -- was in the 12 Internet-Draft staging directory. 13 Do you see that? 14 A Yes, I do. 15 Q Okay. So when that document that's 16 referred to in Exhibit 10 of your declaration, 17 which we've also called Li-2 during this 18 deposition -- when that document was submitted, it 19 landed in the staging directory, and it was 20 accessible by anyone in the world through the URL 21 to the staging directory, correct? 22 MR. COLLIER: Objection. 23 THE WITNESS: I -- I don't understand who 24 objected. I'm not sure -- do I answer the 25 question now?

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1 BY MR. BRIGGS:
2 Q Yes. Yes, if you can.
3 A Okay. Yes, the URL was accessible. It
4 was not advertised, but it was accessible.
5 Q Now, you were asked some questions by
6 Monarch's counsel about whether certain documents
7 were reasonably accessible or reasonably available
8 to those of skill in the art.
9 Now, do you yourself have an opinion as to
10 whether or not documents in the staging folder are
11 reasonably available to those of skill in the art?
12 MR. SPIEGEL: Objection. Calls for an
13 opinion.
14 MR. COLLIER: Same objection.
15 MR. SPIEGEL: You can answer it if you
16 think you can.
17 THE WITNESS: I would say I don't know.
18 BY MR. BRIGGS:
19 Q Now, the document you referred to in
20 paragraph 10 of your declaration, which, again, we
21 referred to as Li-2, do you know how long that
22 document existed inside the IETF's staging folder?
23 A I believe it existed from the date it was
24 submitted in 2008 until sometime earlier this year
25 when the -- when there were major reorganizations

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1 to the infrastructure of the tooling.
2 Q So your belief is that the Li-2 document
3 existed in the staging folder for over 15 years?
4 MR. COLLIER: Objection.
5 THE WITNESS: I do not know for sure, but
6 I think that is true.
7 MR. BRIGGS: No further questions.
8 MR. COLLIER: I have no further questions.
9 MR. SPIEGEL: No questions from me.
10 MR. BRIGGS: All right. Thank you very
11 much, Ms. Morris, for your time.
12 THE VIDEOGRAPHER: Thank you. I'm going
13 to go ahead and take us off the video.
14 This will now conclude the deposition of
15 Alexa Morris on October 22, 2024. We're going to
16 go off the video record at 1:03 p.m. Eastern time.
17 Stand by, please.
18 Thank you everyone. We are off the video.
19 (The deposition was concluded at
20 1:03 p.m.)
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1 DEPOSITION ERRATA SHEET
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5 REASON FOR CHANGE:
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Page 38 1 DECLARATION UNDER PENALTY OF PERJURY 2 3 I, ALEXA MORRIS, do hereby certify under 4 penalty of perjury that I have read the foregoing 5 transcript of my deposition taken on 6 June 11, 2024; that I have made such corrections 7 as appear noted on the Deposition Errata Page, 8 attached hereto, signed by me; that my testimony 9 as contained herein, as corrected, is true and 10 correct. 11 12 Dated this ____ day of _____, 13 2024, at _____. 14 15 16 17 18 _____ 19 ALEXA MORRIS 20 21 * * * 22 23 24 25	
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Page 39 1 C E R T I F I C A T E O F R E P O R T E R 2 3 I, April L. Crites, RPR, RMR, CRR, 4 CSR, the officer before whom the foregoing 5 deposition testimony was taken, do hereby certify 6 that before being examined, ALEXA MORRIS was by me 7 duly sworn to testify to the truth, the whole 8 truth, and nothing but the truth; 9 That the foregoing transcript is a true 10 and correct record of the testimony given; 11 That said testimony was taken by me 12 stenographically and thereafter reduced to 13 typewriting under my direction; 14 That reading and signing was requested; 15 And that I am neither counsel for, related 16 to, nor employed by any of the parties to this 17 case and have no interest, financial or otherwise, 18 in its final disposition. 19 IN WITNESS WHEREOF, I have here unto 20 subscribed my name this 23rd day of October, 2024. 21 22 My commission expires May 31, 2025: 23 24  _____ 25 April L. Crites, RPR, RMR, CRR, CSR CA Certified Shorthand Reporter No. 14493	
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