UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CISCO SYSTEMS, INC. and FORTINET, INC.,

Petitioners,

-versus-

INFOEXPRESS INC.,

Patent Owner.

----------x

IPR2024-00539
U.S. Patent No. 8,051,460

STENOGRAPHIC DEPOSITION OF:
HENRY H. HOUH, Ph.D.
Wednesday, January 8, 2025
9:01 a.m. - 4:59 p.m.
HYBRID DEPOSITION

Reported stenographically by:
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NCRA/NJ/NY/CA Certified Realtime Reporter
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Job No. 56415

TELECONFERENCED STENOGRAPHIC DEPOSITION of HENRY H. HOUH, Ph.D., taken in the above-entitled matter before RICHARD GERMOSEN, Fellow of the Academy of Professional Reporters, Certified Court Reporter, (License No. 30XI00184700), Certified Realtime Court Reporter-NJ, (License No. 30XR00016800), California Certified Shorthand Reporter, (License No. 14391), NCRA/NY/CA Certified Realtime Reporter, NCRA Registered Diplomate Reporter, New York Association Certified Reporter, NCRA Realtime Systems Administrator, taken at WINSTON & STRAWN LLP, 200 Park Avenue, New York, New York 10166-0005, on Wednesday, January 8, 2025, commencing at 9:01 a.m.

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I N D E X

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E X H I B I T S

EXHIBIT NO.	DESCRIPTION	PAGE
Exhibit 1501	U.S. Patent '484	17
Exhibit 1505	copy of Krantz	56
Exhibit 1506	copy of Herrmann	89
Exhibit 401	'450 patent	125
Exhibit 1403	document previously marked Exhibit 1403	126
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Exhibit 1406	document previously marked Exhibit 1406	126

1 E X H I B I T S (CONT'D.)

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(Exhibits retained)

P R O C E E D I N G S

9:01 a.m.

CERTIFIED STENOGRAPHER: On the 09:00:21
stenographic record at 9 a.m. 09:00:22
Good morning. My name is Rich 09:00:23
Germosen. I am a Certified Stenographic 09:00:23
Reporter. My license is available for 09:00:23
inspection. 09:00:23

- - -

(Whereupon, the Certified
Stenographic Reporter administered the oath to
the witness.)

- - -

H E N R Y H. H O U H, Ph.D.,
(the witness produced a State of Massachusetts
driver's license), having been first duly sworn or
affirmed, was examined and testified as follows:
EXAMINATION BY ATTORNEY KUO:
BY ATTORNEY KUO: 09:00:39
Q. Good morning. 09:00:40
Could you please state your name 09:00:41
for the record. 09:00:42
A. Good morning. 09:00:42

My name is Henry Houh, and that's spelled H-O-U-H. 09:00:43 09:00:45

Q. Dr. Houh, we've met before and at a previous deposition. At our previous deposition, we went through a lot of your background, testifying experience, things like that, and I just want to confirm on the record that what was said before, we can use in this proceeding as well; correct? 09:00:47 09:00:54 09:00:57 09:00:59 09:01:02 09:01:04 09:01:09

ATTORNEY BORDER: No objection from counsel. 09:01:12 09:01:13

ATTORNEY KUO: Okay. 09:01:14

THE WITNESS: Sure. 09:01:15

BY ATTORNEY KUO: 09:01:15

Q. Dr. Houh, I'm going to hand you a copy of document. It's EX1503, and the title is: Declaration of Henry Houh, Ph.D., etc., etc. 09:01:18 09:01:21 09:01:30 09:01:33

Just can you confirm for me this is your declaration that was submitted in this case, in this IPR? 09:01:35 09:01:37 09:01:39

A. This is a declaration, yes, that I submitted in two IPR matters that -- because it was split, as I understand it, for the '484 patent. 09:02:05 09:02:07 09:02:09 09:02:13

Q. Great. That was actually my next 09:02:13
question. 09:02:15
So there are two IPRs listed here. 09:02:15
There is 2024675, 2024679; correct? 09:02:17
A. Yes. 09:02:22
Q. And so you submitted one 09:02:23
declaration that's applicable to each of the 09:02:24
IPRs; correct? 09:02:27
A. Yes. 09:02:28
Q. Okay. Did you personally write 09:02:28
this declaration? 09:02:31
A. There were portions that I wrote 09:02:36
personally, but it was a collaborative effort 09:02:37
so, but it was based on conversations that I 09:02:41
had with attorneys prior to the penning of 09:02:45
this. 09:02:51
Q. We have some whistling from the 09:02:55
H.V.A.C. 09:02:57
When you say "collaborative 09:02:59
effort," do you mean you and the attorneys? 09:03:00
A. Yes. 09:03:04
Q. Was there anybody else involved? 09:03:04
A. No. 09:03:06
Q. You don't have a team or anything? 09:03:07
A. No, I do not. 09:03:09

1 Q. You said you personally wrote parts 09:03:12
2 of this. Do you remember which parts? 09:03:15
3 **A. At least the qualifications and** 09:03:26
4 **professional experience portion.** 09:03:27
5 Q. Okay. Anything else? 09:03:29
6 **A. I mean, there may be some portions** 09:03:47
7 **here and there, but, again, this is based on** 09:03:48
8 **conversations and discussion and then a draft** 09:03:53
9 **was made.** 09:03:57
10 Q. Yeah, I understand that. 09:03:59
11 Can you identify any other portions 09:04:01
12 that you recall yourself writing? 09:04:02
13 **A. Well, there may be some portions** 09:04:50
14 **here and there. It's typical to identify them** 09:04:51
15 **right now, but these are my opinions and I** 09:04:54
16 **stand by them.** 09:04:56
17 Q. Okay. So other than the background 09:05:01
18 qualifications, you can't identify for certain 09:05:05
19 any portions of this that you actually wrote? 09:05:09
20 ATTORNEY BORDER: Objection. 09:05:12
21 Foundation. 09:05:12
22 **A. Well, these are my opinions and I** 09:05:17
23 **stand by them, but there may be some** 09:05:19
24 **additional portions here and there, but** 09:05:21
25 **it's -- if you want me to go through every** 09:05:23

1 **single paragraph, that will take some time.** 09:05:26
2 Q. If you can identify them or if you 09:05:29
3 want to just stick by the answer you gave me, 09:05:31
4 that's fine. 09:05:33
5 **A. That's my answer. I stand by my** 09:05:34
6 **opinions in the declaration.** 09:05:35
7 Q. Okay. These conversations that you 09:05:36
8 mentioned, as you said, they were with 09:05:41
9 counsel; correct? 09:05:43
10 **A. Yes.** 09:05:44
11 Q. How many conversations were there? 09:05:51
12 I'm sorry. Let me rephrase that. 09:05:55
13 How many conversations with counsel 09:05:57
14 did you have prior to the first draft of your 09:05:58
15 declaration? 09:06:03
16 **A. I don't remember that offhand.** 09:06:06
17 Q. Can you give me a ballpark? 09:06:09
18 **A. It was probably at least a couple** 09:06:11
19 **of conversations.** 09:06:13
20 Q. "A couple of conversations." 09:06:14
21 Approximately how long did these 09:06:16
22 conversations last? 09:06:18
23 **A. I mean, I wouldn't know exactly** 09:06:22
24 **offhand.** 09:06:24
25 Q. Can you give me a ballpark? 09:06:26

A. **Probably several hours at least.** 09:06:32
Q. Do you have a number? 09:06:35
A. **Probably several hours at least.** 09:06:37
Q. Do you have a number? 09:06:39
A. **Probably several hours at least.** 09:06:41
Q. I heard your answer. "Several" is 09:06:43
not a number. I'm asking for a ballpark 09:06:46
estimate of the number of hours you spent. 09:06:48
A. **I think that's a ballpark estimate.** 09:06:51
Probably several hours at least. 09:06:54
Q. By "several," do you mean three? 09:06:55
A. **Sure. Could include three.** 09:06:58
Q. Do you mean three or could it 09:07:01
include three? 09:07:02
A. **I mean, several, which could** 09:07:04
include three. 09:07:05
Q. Is it more than 10? 09:07:07
A. **Probably not, no.** 09:07:11
Q. Okay. Is it more than seven? 09:07:13
A. **Probably not, no.** 09:07:16
Q. Is it more than five? 09:07:17
A. **Likely -- likely not, no.** 09:07:23
Q. Okay. Is it more than three? 09:07:25
A. **It could have been.** 09:07:28
Q. So the best of your recollection, 09:07:29

somewhere between three and five? 09:07:31
A. Sure. That's several hours at 09:07:36
least, but I can't be sure sitting here right 09:07:38
now. 09:07:46
Q. Do you recall how many drafts of 09:07:52
your declaration were exchanged before it went 09:07:56
final? 09:08:00
A. No, I don't remember that. 09:08:04
Q. Was it more than one? 09:08:14
A. Pretty much definitely, yes. 09:08:18
Q. Was it more than five? 09:08:19
A. Can't be sure about that. Maybe. 09:08:26
Q. Was it more than three? 09:08:30
A. Probably. 09:08:32
Q. So three, five, somewhere in that 09:08:34
neighborhood? 09:08:37
A. Sounds about right, but I don't 09:08:38
remember exactly offhand. 09:08:40
Q. Do you remember some of the 09:08:44
changes, if any, that you made to the drafts? 09:08:45
A. I wouldn't remember that. 09:08:52
Q. Do you recall if there were any 09:08:57
changes to the substance of the opinions that 09:08:58
you made? 09:09:02
A. I don't know what you mean by that, 09:09:12

but I may have added some -- some things here 09:09:13
and there or made some edits. I just don't 09:09:16
remember in this particular case. 09:09:20
Q. So by substance, I mean, not 09:09:22
correcting typographical errors or just 09:09:27
rewording things, but actually changing either 09:09:30
the rationale or the reasoning or the -- any 09:09:37
of the opinions? 09:09:42
A. Well, I don't remember exactly in 09:09:46
this particular case, but sometimes I do add 09:09:47
some additional citations where I feel they're 09:09:49
necessary. 09:09:53
Q. Okay. But you don't remember if 09:09:54
you actually did that in this case? 09:09:57
A. No, I don't remember -- 09:09:59
Q. All right. 09:10:02
A. -- exactly in this case. 09:10:02
Q. As we started off, we went through 09:10:07
your background and experience at a previous 09:10:09
deposition. Do you have anything to add -- 09:10:13
that was back -- that was just a month ago. 09:10:16
Do you have any -- anything of note to add to 09:10:19
that -- to your background and experience? 09:10:22
A. I may have done a few more 09:10:25
depositions and I submitted a report in 09:10:27

1 **another case.** 09:10:31
2 Q. You did or you may have? 09:10:32
3 **A. I don't remember the exact date.** 09:10:37
4 **So I probably had some depositions and I** 09:10:39
5 **think -- I know I submitted a report at some** 09:10:42
6 **point, but I don't remember with respect to** 09:10:44
7 **the timing of our last deposition.** 09:10:46
8 Q. Okay. Were they -- so last 09:10:47
9 deposition was December 4, and what date is it 09:10:52
10 today? January 8. So in that just a little 09:10:57
11 over a month's time, you don't remember if you 09:11:02
12 gave additional depositions? 09:11:08
13 **A. Well, I think that I did, but I** 09:11:10
14 **don't remember how many. It might have been** 09:11:11
15 **two. It might have been three. I don't think** 09:11:13
16 **it was just one.** 09:11:15
17 Q. Okay. Do you remember the cases -- 09:11:16
18 let me rephrase. 09:11:28
19 Did they have anything to do with 09:11:30
20 this case? 09:11:31
21 **A. No.** 09:11:32
22 Q. Okay. Do you know who retained you 09:11:32
23 in these cases? 09:11:37
24 **A. I don't remember. I -- I -- I -- I** 09:11:41
25 **don't remember. I can't remember sitting here** 09:11:44

1 **right now.** 09:11:47
2 Q. Was it Winston & Strawn? 09:11:51
3 **A. I don't think so, no.** 09:11:53
4 Q. Okay. All right. 09:11:55
5 Could we turn to Page -- I'm sorry, 09:12:06
6 Paragraph 37 of your declaration. 09:12:10
7 **A. Yes, I see it.** 09:12:19
8 Q. And Paragraph 37 is under the 09:12:20
9 heading: Claim Construction, and you lay out 09:12:25
10 the standard for how to do a claim 09:12:30
11 construction, but you have not actually given 09:12:33
12 a claim construction of any terms; is that 09:12:37
13 right? 09:12:40
14 **A. Yes, in Paragraph 37, I don't lay** 09:12:45
15 **out any terms, but I want to add that the** 09:12:47
16 **standard under which I understand it's to** 09:12:50
17 **be -- terms are to be construed would be at** 09:12:53
18 **the time of the invention.** 09:12:56
19 Q. Okay. Do you know if there are any 09:12:58
20 plans for you to offer any claim construction 09:13:05
21 opinions in this matter? 09:13:09
22 **A. I don't believe I've been asked to** 09:13:16
23 **do anything like that --** 09:13:19
24 Q. All right. 09:13:21
25 **A. -- at this time.** 09:13:29

Q. Can you flip back to Page 19 of 09:13:36
your report -- I'm sorry, of your declaration? 09:13:38
A. Okay. 09:13:44
Q. And I'm looking at Roman Numeral V, 09:13:45
overview of the '484 patent, and that starts 09:13:48
on Page 19 and it goes through to Page 23; 09:13:53
right? 09:13:58
A. Yes. 09:13:59
- - - 09:13:59
(Whereupon, U.S. Patent '484, is 09:13:59
received and marked as Exhibit 1501 for
Identification.)
- - -
BY ATTORNEY KUO: 09:14:01
Q. And let me hand to you what's been 09:14:05
marked as Exhibit 1501. And this is a copy of 09:14:14
U.S. Patent Number 7523484; correct? 09:14:24
A. Yes. 09:14:28
Q. And this is a patent that you're 09:14:31
discussing in the section on overview of the 09:14:34
'484 patent; correct? 09:14:38
A. Yes. 09:14:40
Q. Could you turn to -- I apologize. 09:14:44
I don't know what page it is. It's the -- 09:14:51
it's Column 1. 09:14:53

1 **A. Okay.** 09:14:59
2 Q. Can you tell me what page that is? 09:15:03
3 **A. It says: Page 13 of 23 of Exhibit** 09:15:05
4 **1501.** 09:15:08
5 Q. Thank you. 09:15:09
6 Looking at the background of the 09:15:09
7 invention starting in Column 1, in the 09:15:13
8 paragraph -- I'm sorry. In the section 09:15:23
9 starting "to related art." 09:15:26
10 Do you see where I am? 09:15:29
11 **A. Yes.** 09:15:30
12 Q. It talks about -- in the first 09:15:32
13 paragraph, it talks about the need for access 09:15:33
14 control for secure networks; right? 09:15:36
15 **A. It starts that way. There is a** 09:15:42
16 **sentence that starts that way.** 09:15:45
17 Q. And then in the next paragraph, it 09:15:50
18 talks about a first level access control being 09:15:52
19 authentication of a user; right? 09:15:55
20 **A. Yeah, I think you're paraphrasing,** 09:16:01
21 **but I see that.** 09:16:04
22 Q. I'm not suggesting that I'm quoting 09:16:04
23 it. I'm just talking about the substance of 09:16:05
24 the paragraph. It's talking about this first 09:16:09
25 level of access control related to 09:16:10

1 authenticating a user; right? 09:16:16
2 **A. It does say about that.** 09:16:18
3 Q. And it gives us examples of 09:16:21
4 authenticating a user entering a username and 09:16:24
5 password; right? 09:16:28
6 **A. For a user to enter a username and** 09:16:33
7 **password. That's one of the things it says.** 09:16:35
8 Q. Uh-huh, and then in the next 09:16:37
9 Paragraph where it starts "reliance on mere 09:16:39
10 user authentication." 09:16:44
11 Do you see where I am? 09:16:46
12 **A. Yes.** 09:16:46
13 ATTORNEY KUO: Am I going too fast? 09:16:46
14 - - - 09:16:48
15 (Clarification requested by the 09:16:48
16 stenographer.) 09:16:48
17 - - - 09:16:56
18 ATTORNEY BORDER: I think you heard 09:17:03
19 mere, M-E-R-E. 09:17:05
20 ATTORNEY KUO: No, no, it's not mere. 09:17:12
21 I'll start all over. 09:17:12
22 BY ATTORNEY KUO: 09:17:15
23 Q. Okay. Slowing down, the paragraph 09:17:18
24 in Column 1 of the '484 patent starting around 09:17:24
25 Line 41 says -- 09:17:29

1 ATTORNEY KUO: Oh, you're right, it is 09:17:34
2 mere. Sorry. 09:17:35
3 Q. It starts "reliance on mere user 09:17:39
4 authentication includes several 09:17:42
5 disadvantages." 09:17:44
6 Do you see where I am? 09:17:45
7 **A. Yes.** 09:17:46
8 Q. Okay. And in this paragraph, again 09:17:47
9 I'm summarizing, paraphrasing, the patent is 09:17:51
10 explaining that the first level of access 09:17:55
11 control of user authentication has 09:18:00
12 shortcomings; is that fair? 09:18:04
13 **A. One of the things listed in the** 09:18:13
14 **previous paragraph about entering username and** 09:18:15
15 **password, it talks about having disadvantages.** 09:18:19
16 Q. Do you agree with my question? 09:18:34
17 **A. Could you repeat your question,** 09:18:38
18 **please?** 09:18:38
19 Q. Sure. 09:18:41
20 I asked you whether the patent is 09:18:42
21 explaining in Column 1 whether this first 09:18:44
22 level of access control of user authentication 09:18:48
23 has shortcomings? 09:18:51
24 **A. It talks about several** 09:18:56
25 **disadvantages and goes on to list them** 09:18:57

1 **starting around Line 42 of Column 1 of** 09:18:59
2 **the '484 patent.** 09:19:02
3 Q. Okay. And then in the next 09:19:05
4 paragraph, which starts around Line 53, it 09:19:09
5 talks about a greater level of access control 09:19:20
6 may be achieved by including a GateKeeper 09:19:23
7 between the secure network and the access 09:19:26
8 device; right? 09:19:28
9 **A. I think that's what it says.** 09:19:33
10 Q. Do you disagree with what it says? 09:19:36
11 **A. Well, I mean, it says what it says,** 09:19:43
12 **and it's going on to explain why a greater** 09:19:44
13 **level of access control may be achieved by** 09:19:48
14 **including a GateKeeper between the secure** 09:19:51
15 **network and the access device. I think** 09:19:52
16 **that's -- it's going to talk about the** 09:19:54
17 **GateKeeper next and what it does.** 09:19:57
18 Q. Okay. And then it actually refers 09:20:00
19 to Figure 1 from the patent itself, and feel 09:20:15
20 free to take a look at that if you'd like. 09:20:18
21 **A. Okay.** 09:20:26
22 Q. And in Figure 1, what's shown is 09:20:27
23 what's called the specifications "secure 09:20:38
24 network 100"; correct? 09:20:41
25 **A. Sure. It does talk about it that** 09:20:56

1 **way.** 09:20:57
2 Q. And then before you can access the 09:20:59
3 secure network, you have to go through the 09:21:01
4 access point and GateKeeper; right? 09:21:04
5 **A. The next paragraph starting at** 09:21:18
6 **Line 65 goes to -- discusses how these ports** 09:21:20
7 **are used to connect through a GateKeeper 110** 09:21:23
8 **to other elements within secure network. So** 09:21:27
9 **that's what's being described in the last** 09:21:30
10 **paragraph.** 09:21:31
11 Q. Do you disagree with what I had 09:21:33
12 said? 09:21:35
13 **A. Could you repeat what you said,** 09:21:40
14 **please?** 09:21:41
15 Q. Sure. 09:21:42
16 In order to access secure network 09:21:42
17 100, the access device must go through access 09:21:43
18 point and GateKeeper; right? 09:21:47
19 **A. Well, Figure 1 of the prior art is** 09:22:09
20 **labeled -- that's how it's labeled in** 09:22:12
21 **Figure 1, and the paragraph that I was talking** 09:22:15
22 **about, the next paragraph starting at Line 64,** 09:22:17
23 **does talk about how access point 120 includes** 09:22:20
24 **communication ports, individual communication** 09:22:28
25 **ports, and that those ports are used to** 09:22:31

connect through GateKeeper. So that's what's being described with respect to Figure 1 in this example, so what's being talked about. 09:22:33 09:22:35 09:22:37

Q. What's being talked about in the patent, and tell me if you agree or disagree with this, is that an access device in order to communicate with the resources within the secure network must first pass through an access point and GateKeeper? 09:22:44 09:22:46 09:22:50 09:22:53 09:23:00 09:23:02

A. Well, if you look at Column 2, Line 26, what the specification says is a distancing of the use of GateKeeper 110 as practiced in the prior art is that all communications between access device 160 and LAN 125 pass through GateKeeper 110. 09:24:19 09:24:20 09:24:24 09:24:27 09:24:28 09:24:31

For large networks, including many instances of access point 120, each of which may include many communication ports, this can be a significant burden. And it goes on there, but this is what the specification says about what the disadvantage of the prior art is. 09:24:36 09:24:38 09:24:40 09:24:43 09:24:46 09:24:51 09:24:55

Q. That's all I'm asking you about. I'm asking you about what's said here in the patent. 09:24:56 09:24:58 09:25:01

1 **A. And I pointed out what it says** 09:25:04
2 **about -- what the specification says about a** 09:25:06
3 **disadvantage of the GateKeeper as practiced in** 09:25:09
4 **the prior art, but my declaration lays out** 09:25:13
5 **what was obvious to a POSITA and why the** 09:25:18
6 **claims -- the challenged claims are** 09:25:20
7 **unpatentable.** 09:25:24
8 Q. Uh-huh. 09:25:25
9 So I'm just going to keep asking 09:25:27
10 these questions until I get just an actual 09:25:30
11 answer to my question. 09:25:32
12 My question a while back, and it's 09:25:36
13 still my question, is: According to what the 09:25:41
14 patent teaches and what the patent says, 09:25:44
15 what's shown -- what the prior art was, was 09:25:49
16 that in order for an access device to 09:25:53
17 communicate with a secure network, it had to 09:25:56
18 communicate through both an access point and a 09:26:00
19 GateKeeper; is that right? 09:26:03
20 **A. I mean, what the patent says in** 09:26:09
21 **Column 2 at Line 26 is: A disadvantage of the** 09:26:10
22 **use of GateKeeper 110 as practiced in the** 09:26:14
23 **prior art is that all communications between** 09:26:17
24 **access device 160 and LAN 125 pass through** 09:26:18
25 **GateKeeper 110, and that's what the patent** 09:26:21

1 **says about the prior art as shown in Figure 1,** 09:26:24
2 **but my whole declaration is about why the** 09:26:29
3 **challenged claims are unpatentable.** 09:26:32
4 Q. Dr. Houh, we'll get to your 09:26:35
5 declaration. I promise you, we will. I'm -- 09:26:36
6 I'm going to ask you questions and I'd like 09:26:40
7 you to answer -- actually answer my questions. 09:26:41
8 So my question is simply: Do you 09:26:48
9 agree or disagree that according to what the 09:26:51
10 patent says, and I understand that you 09:26:52
11 disagree that that was at the state of the 09:26:57
12 prior art, but according to what the patent 09:27:00
13 says, the prior art required that an access 09:27:02
14 device go through both an access point and a 09:27:04
15 GateKeeper before it can communicate with a 09:27:07
16 secure network? 09:27:10
17 **A. I think what this patent** 09:27:16
18 **specification is saying is that with respect** 09:27:18
19 **to the figure, Figure 1, which was drawn by** 09:27:20
20 **the patentee in that figure, it's describing a** 09:27:25
21 **disadvantage and -- because they locate the** 09:27:31
22 **GateKeeper with the access point. They're** 09:27:33
23 **saying that the disadvantage of the layout of** 09:27:37
24 **Figure 1, which it labels prior art, is that** 09:27:40
25 **all communications between access device 160** 09:27:46

1 **and LAN 125 pass through GateKeeper 110.** 09:27:48
2 Q. And the disadvantages that are 09:27:54
3 identified in the patent, those include that 09:27:57
4 it's extremely costly to have a lot of 09:28:05
5 GateKeepers at each access point; is that 09:28:09
6 right? That's one of the disadvantages? 09:28:11
7 And, Doctor, I'll point you to 09:28:52
8 where I'm looking in Column 2, Line 37, there 09:28:53
9 is a sentence starting with the word 09:29:00
10 "further." 09:29:01
11 Do you see where I am? 09:29:07
12 **A. Yes, I see that.** 09:29:07
13 Q. And what's stated there is: 09:29:09
14 Further, the use of a separate GateKeeper 110 09:29:10
15 for each instance of access device 160 or 09:29:14
16 access point 120 is often prohibitively 09:29:17
17 expensive; right? 09:29:21
18 **A. That's what the specification** 09:29:23
19 **appears to say.** 09:29:25
20 Q. And so one of the disadvantages 09:29:26
21 that's identified in the patent is if there is 09:29:30
22 a lot of GateKeepers, it gets really 09:29:38
23 expensive; right? 09:29:42
24 **A. I mean, it's also -- if you go a** 09:29:45
25 **few lines up, it's also describing other** 09:29:46

1 **issues, which is --** 09:29:49
2 Q. I'm not -- I'm -- I'll take them 09:29:51
3 one at a time. One of the issues relates to 09:29:53
4 this expense factor; correct? 09:29:58
5 **A. One of the issues is relating to** 09:30:09
6 **the use of a separate GateKeeper for each** 09:30:12
7 **instance of an access device or access point** 09:30:15
8 **is often prohibitively expensive. It says** 09:30:20
9 **"it's often," but another one it talks about** 09:30:23
10 **is that the use of one instance of GateKeeper** 09:30:25
11 **110 to support numerous instances of access** 09:30:26
12 **device is limited by bandwidth and require** 09:30:30
13 **sophistication, e.g., costs.** 09:30:33
14 **So the cost of multiple GateKeepers** 09:30:35
15 **is not the only cost that this paragraph is** 09:30:39
16 **discussing. It's also the cost of a** 09:30:42
17 **sophisticated GateKeeper that is used to** 09:30:45
18 **support multiple or numerous instances of** 09:30:49
19 **access device.** 09:30:52
20 Q. Dr. Houh, I apologize if you think 09:30:54
21 my question is all -- is completely exclusive 09:30:57
22 of other issues in the prior art. It's not 09:30:59
23 intended to be so. 09:31:03
24 I've asked you one question about 09:31:04
25 one disadvantage that's stated in the patent 09:31:09

and that goes to the expense related to having 09:31:13
a lot of GateKeepers, and you'll agree with me 09:31:16
that one of the stated disadvantages is this 09:31:19
expense in having multiple GateKeepers; right? 09:31:23
A. I mean, that's only part of what it 09:31:28
says about expense, but it also talks about 09:31:29
expenses related to a single GateKeeper or one 09:31:33
instance of a GateKeeper to support numerous 09:31:39
instances of access device and how that also 09:31:41
can be costly. 09:31:44
Q. And the cost there is in terms of 09:31:46
bandwidth? 09:31:48
A. It says: There is a limit about 09:31:52
bandwidth and required sophistication, e.g., 09:31:54
costs. And so something that's bigger has 09:31:57
more bandwidth and sophistication, also it's 09:32:00
saying is -- can be costly. 09:32:03
Q. Okay. And that's an additional 09:32:07
shortcoming that's -- according to the patent, 09:32:14
that's an additional shortcoming of the prior 09:32:17
art? 09:32:19
A. I mean, with respect to the 09:32:29
Figure 1, Figure 1 is showing a GateKeeper 09:32:30
with every access point. I think this is also 09:32:35
a general statement with respect to when there 09:32:37

is one instance of a GateKeeper 110 to support 09:32:40
numerous instances of access device and how 09:32:43
that would be limited by bandwidth and require 09:32:54
sophistication. 09:32:57
So it's not the -- the cost that 09:32:57
you mentioned about the prohibitively 09:33:04
expensive, which is often, but not -- I'm 09:33:07
saying it's not the only cost that's discussed 09:33:11
in this paragraph. 09:33:15
Q. And nor am I. I've never said 09:33:16
that. I've said that the costs of having 09:33:18
multiple GateKeepers is one of the 09:33:23
disadvantages, and then I was going to talk 09:33:25
about the other disadvantages. 09:33:28
And so another disadvantage relates 09:33:31
to bandwidth; correct? 09:33:33
A. It does mention a disadvantage 09:33:51
related to bandwidth. 09:33:57
Q. In fact, it says at Line 34 in 09:33:58
Column 2: It is undesirable for GateKeeper 09:34:01
110 to become a limiting factor on the 09:34:05
bandwidth of communication between instances 09:34:08
of access device 160 and secure network 100; 09:34:09
right? 09:34:14
A. That's what the specification is 09:34:16

saying, sure. 09:34:17
Q. Okay. And then at the end of the 09:34:19
background of the invention in Column 2, it 09:34:22
says: There is, therefore, a need for 09:34:25
improved systems and methods controlling 09:34:28
access to secure networks; right? 09:34:30
A. That's what it says. 09:34:33
Q. And also in the background in the 09:34:34
invention there is discussion about -- I 09:34:36
apologize for skipping back, but you kind of 09:34:43
drove me in that direction. We had talked 09:34:45
earlier about that first level of access 09:34:49
control being user authentication; right? 09:34:51
A. If you're referring to what we were 09:35:03
talking about in Column 1 around Line 31, 09:35:04
sure. I mean, it kind of says that. 09:35:06
Q. Okay. And then it talks about the 09:35:10
second level or at a greater level of access 09:35:13
control, and this is where we started talk 09:35:15
about the GateKeeper, and, I'm sorry, I'm 09:35:19
referring to Column 1, Line -- the paragraph 09:35:25
starting at Line 53, and here it's explained 09:35:27
that the GateKeeper ensures that the access 09:35:34
device conforms to a predetermined security 09:35:39
policy; right? 09:35:43

A. I think it does say that in Line 55. 09:35:46 09:35:48

Q. And then if we go to Column 2, starting at Line 15 it states: In addition to authenticating users who wish to access secure network 100 using access device 160, GateKeeper 110 is configured to ensure that access device 160 conforms to a predetermined security policy before granting access to secure network 100. For example, GateKeeper 110 may make certain that access device 160 has up-to-date virus software and encryption protocols as prescribed by the security policy. 09:35:55 09:36:05 09:36:09 09:36:13 09:36:16 09:36:19 09:36:23 09:36:26 09:36:31 09:36:35 09:36:39 09:36:41

Did I read that correctly? 09:36:42

A. I wasn't looking there when you were starting to read, but I saw midway through, but it seemed about right. 09:36:45 09:36:46 09:36:49

Q. Okay. And so the security policy and this ensuring that the access device complies with the security device -- I'm sorry, with the security policy, examples of that that are given are making sure it has up-to-date virus software and encryption protocols; right? 09:36:51 09:37:01 09:37:10 09:37:10 09:37:14 09:37:17 09:37:20

1 **A. That's one example of what the spec** 09:37:29
2 **is talking about with respect to the** 09:37:30
3 **GateKeeper 110.** 09:37:32
4 Q. And so when the spec is talking 09:37:33
5 about ensuring compliance with the security 09:37:34
6 policy, it's talking about how the access 09:37:39
7 device itself is configured; right? 09:37:42
8 **A. In this example, it's talking about** 09:37:47
9 **the access device 160 and its software and** 09:37:51
10 **protocols it supports.** 09:37:55
11 Q. So what's explained in the 09:37:57
12 background of the invention is that in the 09:38:00
13 prior art, there was both user authentication 09:38:08
14 as one level of access security and then 09:38:15
15 checking security policy as a second level of 09:38:18
16 access control; correct? 09:38:22
17 **A. As laid out by the inventors here,** 09:38:27
18 **that's what the spec says.** 09:38:28
19 Q. Right. And then we talked at 09:38:32
20 length about the disadvantages that -- at 09:38:33
21 least according to the patent that the prior 09:38:35
22 art had; correct? 09:38:39
23 **A. In the view of the inventors here,** 09:38:45
24 **this is -- this background is their view.** 09:38:48
25 Q. Can you turn to your declaration at 09:39:03

page -- actually, I have a couple of cleanup 09:39:06
questions here, but Page 20. 09:39:15
A. Okay. 09:39:16
Q. Paragraph 32, I asked you this 09:39:18
question last time, but I just want to confirm 09:39:19
again: In Paragraph 32, you say you've 09:39:22
reviewed the file history of the '484 patent, 09:39:25
including the file histories of patents to 09:39:27
which the '484 claims priority, and note that 09:39:29
none of the activity there is pertinent to my 09:39:32
analysis. 09:39:34
Can you explain to me, again, what 09:39:35
that means? 09:39:36
A. Well, the back-and-forth between 09:39:38
the Patent Office and the patentees -- 09:39:40
Q. Uh-huh. 09:39:49
A. -- also, and in prior applications 09:39:52
to which the '484 patent claims priority, and 09:39:59
I don't think I saw anything that related to 09:40:03
anything that would affect my analysis here. 09:40:08
Q. So, for example, you didn't see 09:40:10
anything in the prosecution history that would 09:40:12
help explain the scope of the claims? 09:40:18
A. Well, I mean, none that affected my 09:40:28
obviousness analysis with respect to the 09:40:31

challenges, the combinations of the various 09:40:32
references, I don't think any of what I 09:40:38
remember seeing in the file history would be 09:40:42
pertinent to that. 09:40:44
Q. Okay. And part of that is because 09:40:45
you didn't actually perform a claim 09:40:47
construction? 09:40:49
A. I don't think I put it that way. I 09:40:54
mean -- I mean, I applied the plain and 09:40:56
ordinary meaning of the various claim terms in 09:41:03
light of the specification prosecution history 09:41:05
as would have been understood by a POSITA at 09:41:09
the time of the invention. 09:41:13
Q. Right. So there is nothing in the 09:41:13
prosecution history that would have affected 09:41:15
at least your view what the plain and ordinary 09:41:16
meaning of claim terms was; correct? 09:41:18
A. As applied to the various 09:41:21
references in my declaration. So I think if 09:41:22
you look at the various references in what I 09:41:28
mapped things to, I think they were 09:41:30
conventional. 09:41:33
Q. We'll get to that. 09:41:33
A. And there was nothing that would 09:41:34
have affected the mapping, which is a slightly 09:41:35

1 **different issue than what you asked about.** 09:41:42
2 Q. You've referred to the prior art 09:41:45
3 references that you've applied as part of your 09:41:47
4 mapping. 09:41:51
5 Let me ask you: Did you first have 09:41:52
6 an understanding of the scope of the claims 09:41:56
7 and then determine whether or not the prior 09:42:00
8 art falls within the scope of the claims or 09:42:04
9 did you just take the prior art and make it 09:42:07
10 fit to the claims? 09:42:12
11 ATTORNEY BORDER: Object to the form. 09:42:14
12 **A. I mean, typically when I work on** 09:42:15
13 **these things, I review the patent. I review** 09:42:17
14 **portions of the file histories, which are** 09:42:20
15 **really the office actions and replies and** 09:42:23
16 **things like that.** 09:42:24
17 **So I form an idea and I look at** 09:42:27
18 **what the claims say, and then, you know, if** 09:42:30
19 **there are examples of things, you know, that** 09:42:34
20 **talks about our, say, security policies or** 09:42:37
21 **something, you know, I look at combinations or** 09:42:40
22 **references and whether, you know, a reference** 09:42:47
23 **would disclose everything or combinations of** 09:42:49
24 **references would be obvious and, you know, why** 09:42:54
25 **a POSITA would have been motivated to make** 09:43:00

1 **those combinations.** 09:43:03
2 Q. I'm not sure you answered my 09:43:04
3 question. You may have. So I'm going to see 09:43:05
4 if I can break that down a little bit. 09:43:09
5 When you perform your invalidity or 09:43:14
6 unpatentability analysis, do you first 09:43:19
7 determine the scope of the patent claims 09:43:24
8 before looking at the prior art? 09:43:29
9 ATTORNEY BORDER: Objection. Form. 09:43:33
10 **A. So I look at the claim. I look** 09:43:34
11 **at -- I interpret the -- you know, I often** 09:43:37
12 **will look back in the specification to see,** 09:43:41
13 **you know, what does it say about what a term** 09:43:43
14 **in the claim means or includes. Sometimes** 09:43:47
15 **there is an expressed definition in the** 09:43:51
16 **specification. Sometimes it gives examples.** 09:43:54
17 **So when I do that, you know, that's** 09:43:57
18 **how I look at how to interpret claim terms** 09:44:00
19 **under their plain and ordinary meaning to a** 09:44:05
20 **POSITA at the time of the invention. That's** 09:44:08
21 **one of the things.** 09:44:10
22 **And sometimes the prosecution** 09:44:12
23 **history clarifies some certain issues that** 09:44:14
24 **they discuss. Sometimes the patentee makes** 09:44:19
25 **some statements there, but for this case, and** 09:44:24

then so I build up an understanding of, you 09:44:31
know, what the patent is about and what the 09:44:34
claims are directed to, and then when I look 09:44:36
at the prior art or combinations of prior art, 09:44:46
one thing I might do is -- in the mapping is I 09:44:48
will look for examples of the things given in 09:44:53
the specification in the prior art as to what 09:44:55
the prior art is teaching. 09:45:04
Q. Okay. Are you done? 09:45:10
A. Well, I mean, you know -- and when 09:45:12
there is a combination, I give, you know, a 09:45:14
reason a POSITA would have been motivated to 09:45:17
make such a combination, and I laid that out 09:45:20
in my declaration. 09:45:24
Q. Do you ever determine for yourself 09:45:24
prior to -- I'm sorry. Strike that. 09:45:26
Prior to looking to the art that 09:45:28
you apply, do you determine for yourself the 09:45:32
scope of the claims? 09:45:35
ATTORNEY BORDER: Objection. Form. 09:45:38
A. I look at things laid out in the 09:45:41
specification that are examples of what the 09:45:43
specification gives about certain phrases that 09:45:47
might be in the claims, and that's one thing I 09:45:52
do. 09:45:56

Now, you know, if there is an issue 09:45:56
where it feels like there may be some 09:45:58
contention about what -- about certain 09:46:06
borders, I may want to try to address that, 09:46:10
but I don't think there is an issue here that 09:46:17
I saw with respect to some contentious mapping 09:46:19
that I may have performed, because I think in 09:46:24
my declaration, we can walk through it, I 09:46:31
think things like, you know, what the networks 09:46:34
were, what the access devices were, they 09:46:36
weren't -- you know, the various issues that 09:46:39
I -- phrases and things that were claimed or 09:46:40
phrases that were used in the claims, I feel 09:46:45
were very parallel to what the specification 09:46:47
gave as examples. 09:46:54
While we can look through them one 09:46:57
by one if you want, you can ask me about them, 09:46:59
but, you know, if the specification were to 09:47:03
say, This is what this term means, I would 09:47:06
apply that in my analysis oftentimes. I don't 09:47:09
recall that occurring in this case. 09:47:16
In this case, I think the 09:47:19
specification may have given examples, and 09:47:20
what are some examples of access devices? 09:47:22
What are some examples of security policies? 09:47:24

1 **And I -- and those are the kinds of things** 09:47:27
2 **where if a specification is talking about it,** 09:47:34
3 **it's clearly in the scope of a claim term.** 09:47:35
4 Q. So you are saying that the way you 09:48:10
5 performed your analysis was to see if terms 09:48:14
6 that appeared in the patent specification also 09:48:19
7 appeared in the prior art? 09:48:24
8 ATTORNEY BORDER: Objection. 09:48:27
9 Foundation. 09:48:27
10 **A. I think you're misinterpreting what** 09:48:29
11 **I said.** 09:48:31
12 Q. I'm asking you if that's what you 09:48:32
13 said? 09:48:33
14 **A. That's not what I said.** 09:48:34
15 Q. Okay. Then back to my original 09:48:35
16 question: Prior to applying the prior art to 09:48:40
17 the claims, and this really is a yes-or-no 09:48:47
18 question, do you determine the scope of the 09:48:51
19 claims? 09:48:58
20 ATTORNEY BORDER: Objection. Form. 09:49:00
21 **A. What I looked for in my analysis** 09:49:03
22 **when I'm looking at the patents and the claim** 09:49:04
23 **terms is I look for examples of things that** 09:49:06
24 **are given in the specification of those -- of** 09:49:12
25 **certain claim terms, and so when I see** 09:49:15

1 **examples in the specification, for example, if** 09:49:21
2 **it's using the term "access device" in the** 09:49:23
3 **claim and then in a specification -- I -- we** 09:49:26
4 **can look through the specification if you** 09:49:32
5 **want.** 09:49:33
6 **Maybe I can find an example, but if** 09:49:33
7 **it's now using access device in the** 09:49:33
8 **specification, it says and it gives some** 09:49:36
9 **examples of access devices, which** 09:49:38
10 **specifications often do with respect to** 09:49:41
11 **certain claim terms, then I will -- from the** 09:49:43
12 **point of view of a POSITA, they would** 09:49:48
13 **understand that the scope of the claim term** 09:49:51
14 **includes at least those examples given in the** 09:49:54
15 **specification when it's talking about that** 09:49:58
16 **claim term and giving examples. So that is** 09:50:00
17 **certainly determining and this is part of what** 09:50:03
18 **I do looking in the spec to see examples that** 09:50:07
19 **clearly would fall within the scope because** 09:50:10
20 **they're given as specific examples of a claim** 09:50:11
21 **term -- of a claim term in the specification.** 09:50:15
22 **So I certainly do that.** 09:50:18
23 Q. I understand that you look at the 09:50:22
24 specification. At any point, and I'm talking 09:50:25
25 about this specific case, I don't really care 09:50:29

what you do in other cases, in this case -- in 09:50:32
this IPR or these IPRs, did you ever 09:50:36
construe -- I'm sorry, not construe -- did you 09:50:39
ever determine the scope of the claims? 09:50:42
ATTORNEY BORDER: Objection. Form. 09:50:47
Q. If you're looking for your claim 09:51:31
construction section, it's on Page 23. 09:51:33
A. So I just wanted to point out a 09:53:51
typo on Paragraph 86. In Paragraph 86, I 09:53:52
referenced Section 10A1A. I think that's 09:53:54
actually 9A1A. But, for example, I'll give 09:53:58
you an example of one thing I did do with 09:54:01
respect to the network of the '484 patent as 09:54:05
claimed. 09:54:10
If you look at Paragraph 66 in my 09:54:12
declaration, I talk about how the network of 09:54:14
the '484 patent can include multiple networks 09:54:19
as opposed to a single network and limitation. 09:54:23
For example, explains that in 09:54:26
various embodiments, protected network 200 09:54:27
includes a corporate network, telephone 09:54:30
network, private network, local area network, 09:54:33
wide area network, wireless network, 09:54:35
communication network, government network, 09:54:38
university network, and/or the like, and that 09:54:40

comes from the specification at Column 6, Lines 1 through 5. 09:54:43 09:54:46

So this is an example of when I look at the term "protected network" in the claims, I look at it from the point of view or from a POSITA looking at the specification and the file history, and the specification talks about how the protected network includes all these other networks. So there is an example of the kinds of network protected network 200 can include. 09:54:47 09:54:49 09:54:56 09:55:00 09:55:04 09:55:09 09:55:11 09:55:14 09:55:17

Q. Okay. So -- I'm sorry, are you done? 09:55:18 09:55:20

A. So as I look for -- as I do my mappings for protected network, I look for networks that are consistent with how the examples of the protected network are laid out in the patent specification. 09:55:20 09:55:25 09:55:28 09:55:31 09:55:34

Q. Uh-huh. 09:55:37

So I'm not really sure you're answering my question. I know what you're telling me you did, which is you look for examples in the '484 for certain claims; right? 09:55:49 09:55:50 09:55:55 09:56:00 09:56:05

A. I look to see examples of what the 09:56:10

1 patent specification gives with respect to 09:56:14
2 certain claim terms so I can understand how 09:56:19
3 the patentee through the specification viewed 09:56:22
4 those terms as the claim did. 09:56:28
5 So if now protected network, it's 09:56:33
6 claimed, for example, I think Claim 1 of the 09:56:39
7 '484 patent uses the term "protected network," 09:56:41
8 I'll look in the specification itself, and 09:56:46
9 this is what a POSITA would have done at the 09:56:50
10 time of the invention, to see what the patent 09:56:52
11 is teaching about what a protected network is, 09:56:57
12 and the scope of the phrase "protected 09:56:59
13 network," for example, in the claims would 09:57:03
14 include the way -- the examples in the 09:57:06
15 specification and the way the specification 09:57:12
16 talks about it, and in this example that I 09:57:14
17 give from the specification, it talks about in 09:57:18
18 various embodiments, protected network 200 09:57:20
19 includes -- and it lists a number of different 09:57:25
20 things. And so that's how I determined at 09:57:28
21 least some of the things that are clearly 09:57:31
22 within the scope of certain claim terms, like 09:57:33
23 protected network. 09:57:35
24 And, you know, if the prior art, 09:57:37
25 you know, for example, Krantz here explains 09:57:45

that the disclosed networks simply implement 09:57:47
using any number of -- 09:57:53
- - - 09:57:53
(Clarification requested by the 09:57:53
stenographer.) 09:57:53
- - - 09:57:53
THE WITNESS: Disclosed networks. 09:57:53
A. And Krantz explains that the 09:57:53
disclosed networks can be implemented using 09:57:56
any number of techniques, such as, for 09:57:58
example, virtual local area networks, gives 09:58:01
some VLANs, internet protocol, IP filtering, 09:58:06
and it goes on, Krantz goes on, and those are 09:58:10
consistent with those examples that are 09:58:19
clearly within the scope of what protected 09:58:21
network or networks are -- 09:58:22
Q. Okay. 09:58:27
A. -- as explained by the patent 09:58:27
specification itself, and that's some of what 09:58:31
I do to determine things that are within the 09:58:33
scope of claim terms. 09:58:37
Q. Okay. Since you pointed me at that 09:58:37
one in particular, and you say Krantz teaches 09:58:39
both virtual local area networks or VLANs, 09:58:45
internet protocol filtering, or IP filtering, 09:58:50

virtual private networks or VPNs or use of IP 09:58:54
security protocols; right? That's what you 09:58:58
just pointed to me? 09:59:01
A. Yes, but the explanation spans 09:59:03
multiple paragraphs. 09:59:06
Q. That's some of the stuff that you 09:59:07
just pointed me to; right? 09:59:08
A. Yes, and -- 09:59:10
Q. And then -- 09:59:11
A. Yes. My declaration stands for 09:59:12
itself. You know, you can look at further 09:59:14
paragraphs, but at least that's one of the 09:59:16
things I was pointing you to. 09:59:18
Q. And so in the excerpt from the '484 09:59:19
patent that you reference in your Paragraph 66 09:59:27
for protected network, VLANs, IP filtering, 09:59:34
VPNs and IP security aren't one of the things 09:59:41
listed; right? 09:59:44
A. Well, one of the things listed is 09:59:47
local area network, and a virtual local area 09:59:48
network is also a local area network. 09:59:51
Q. It doesn't say virtual local area 09:59:56
network in 44; does it? 09:59:58
A. Well, virtual local network is a 10:00:02
specific -- 10:00:03

- - - 10:00:03

(Unintelligible, simultaneous 10:00:03
testimony interrupted by the certified 10:00:03
stenographer.) 10:00:03

- - - 10:00:03

CERTIFIED STENOGRAPHER: I need one at 10:00:03
a time, please. 10:00:03

Q. I'm so sorry. I coughed. I didn't 10:00:07
finish. 10:00:08

A. A virtual local area network is -- 10:00:09

Q. I didn't finish my question. I 10:00:10
was -- I coughed while I was -- my apologies. 10:00:12

In the quoted part of '484, it 10:00:18
doesn't say virtual local area network; does 10:00:21
it? 10:00:24

A. It says local area network in the 10:00:27
quoted part of the '484, and the Krantz 10:00:30
specifically lists a virtual local area 10:00:41
network, which is one type of local area 10:00:42
network. 10:00:45

Q. So is any local area network a 10:00:46
protected network? 10:00:53

A. Well, the '484 gives examples of 10:01:00
the kinds of networks included in protected 10:01:02
networks. 10:01:06

Q. So the '484 says that the protected 10:01:08
network could be a corporate network. It 10:01:10
could be a telephone network, etc., etc. 10:01:13
What makes a network a protected 10:01:15
network? 10:01:17
A. So if you go on to Paragraph 71, I 10:01:45
address this issue specifically with respect 10:01:48
to the protected networks, and what the '484 10:01:50
patent describes as some of the 10:01:53
characteristics of protected networks. For 10:01:55
example, first of all, with respect to the 10:01:58
broader term "network," the '484 patent 10:02:02
explains that a network may be physically or 10:02:06
logically divided into a restricted subset and 10:02:09
one or more less restricted subsets. 10:02:13
And it goes on to talk about -- the 10:02:17
'484 patent further explains that protected 10:02:24
network may include access restrictions. And 10:02:26
then I talk about how the protected network 10:02:30
describing Krantz talks about restricting 10:02:35
access to a second network. 10:02:42
And so I do, you know, in this 10:02:44
section talk about some of the characteristics 10:02:50
that are laid out by the '484 patent with 10:02:56
respect to a protected network and talk about 10:03:01

how it includes access restrictions at the end 10:03:04
of Paragraph 71, and then how in Paragraph 73 10:03:09
Krantz is describing the network architecture 10:03:15
that can provide access to a first network, 10:03:19
while restricting access to a second network 10:03:20
and how Krantz further explains how that in 10:03:25
some embodiments, access to resources located 10:03:29
in network can be restricted by the use of 10:03:31
virtual local area networks. 10:03:33
Q. Dr. Houh, I don't need you to read 10:03:36
me your declaration. I need you to answer my 10:03:39
questions. 10:03:42
And honestly, I don't even remember 10:03:49
what my question was because you're not 10:03:50
answering it. You're just kind of talking 10:03:52
here. So let me just start over. 10:03:54
The plain and ordinary meaning as 10:04:03
would be understood by POSITAs at the time of 10:04:07
the invention of a protected network, what is 10:04:10
a protected network that differentiates it 10:04:15
from just a network? 10:04:19
ATTORNEY BORDER: Object to the form. 10:04:22
A. So I address this in my declaration 10:04:23
where I talk about what the '484 patent talks 10:04:26
about -- 10:04:31

Q. Are you going to point me to the 10:04:32
same thing you just talked about? 10:04:33
A. You asked me a question, which I 10:04:34
think is answered in my declaration, so I'm 10:04:35
trying to answer the question. 10:04:38
Q. Then just point me to the 10:04:39
paragraphs. 10:04:40
A. Well, you can look at this section 10:04:41
generally with respect to the area around 10:04:42
where I was pointing to you just now. 10:04:48
Q. Okay. And that was Paragraph 71? 10:04:50
A. And the following paragraphs and 10:04:57
maybe some other preceding paragraphs, but 10:04:59
it's all laid out in my declaration. I think 10:05:00
the answer to your question is -- 10:05:03
Q. Well, I'm asking about the '484 10:05:05
patent, and Paragraph 71 talks about the '484 10:05:07
patent. Paragraph 72 and the following 10:05:11
paragraphs actually talk about Krantz; 10:05:13
correct? 10:05:16
A. Well, some of the preceding 10:05:28
Paragraphs talk about the '484, which is if 10:05:29
you go back to Paragraph 66, for example. So 10:05:30
that's why I'm pointing to this section 10:05:35
generally. I talk about what the '484 patent 10:05:37

discloses with respect to protected networks 10:05:39
in different places in this section. 10:05:41
Q. Can you summarize for me -- I 10:05:44
really -- I understand your declaration says 10:05:46
what it says. Can you summarize for me, and 10:05:49
I'm not limiting it to you, you know, if you 10:05:52
want to say whatever is in my declaration, can 10:05:54
you summarize for me what differentiates a 10:05:57
protected network in the '484 from just a 10:06:00
regular network -- and, I'm sorry, let me 10:06:05
rephrase that. 10:06:09
When we talk about the '484 patent 10:06:12
and you said that the plain and ordinary 10:06:14
meaning is what applies at the time of the 10:06:16
invention; correct? 10:06:18
A. As understood by a POSITA in the 10:06:20
context of the specification and prosecution 10:06:23
history. 10:06:25
Q. There is a word "network" by itself 10:06:30
without any kind of adjective attached to it; 10:06:31
right? 10:06:34
A. (No response.) 10:06:37
Q. Right? 10:06:37
A. The word "network" itself is just a 10:06:43
word. It doesn't have a further adjective I 10:06:45

1 **don't think.** 10:06:48
2 Q. Okay. So a protected network is a 10:06:48
3 more specific phrase than just network; 10:06:51
4 correct? 10:06:58
5 **A. Sure.** 10:07:00
6 Q. And, in fact, I think you say -- 10:07:03
7 oh, actually, it's on Page 39 of your 10:07:05
8 declaration. In the footnote you say: Claim 10:07:08
9 1 of the '484 patent claims both a network, in 10:07:13
10 quotes, and protected network, also in quotes, 10:07:17
11 and then you say: Krantz's network is also 10:07:20
12 protected network as described in detail below 10:07:27
13 and given protective network's narrower 10:07:30
14 coverage, that term is used in my analysis. 10:07:33
15 So you're saying protected network 10:07:35
16 is narrower in meaning than just network; 10:07:37
17 right? 10:07:41
18 **A. Sure.** 10:07:44
19 Q. Okay. So what differentiates a 10:07:44
20 protected network from a network? 10:07:47
21 **A. So if you look at the specification** 10:08:48
22 **of the '484 in Column 6 starting at Line 21,** 10:08:50
23 **it gives an example of in some embodiments,** 10:08:53
24 **protected network 200 includes elements having** 10:08:57
25 **a hierarchy of access restrictions. For** 10:09:02

1 example, access to network PC240 may require a 10:09:04
2 higher level of 40 than access to file server 10:09:08
3 235. 10:09:10
4 In this case, as described further 10:09:12
5 herein, access control lists within router 220 10:09:16
6 or optionally used to independently control 10:09:19
7 access to specific devices within less 10:09:21
8 restricted subset 210. Protected network 200 10:09:23
9 may be large, including tens, hundreds, or 10:09:28
10 thousands of devices. 10:09:31
11 The hierarchy of access 10:09:33
12 restrictions may be enforced by a hierarchal 10:09:34
13 set of security policies defined using policy 10:09:38
14 manager 250. In various embodiments, router 10:09:41
15 220 and access point 220 may be considered 10:09:46
16 part of restricted subset or less restricted 10:09:49
17 subset 210. Sorry, I left 205 off after 10:09:52
18 restricted subset. 10:09:56
19 So that's an example of what's 10:09:59
20 given in the specification of how a protected 10:10:02
21 network is distinguished from a network 10:10:04
22 generally, because in some of the embodiments 10:10:08
23 described in the specification of the '484, 10:10:13
24 protected network 200 includes elements having 10:10:15
25 a hierarchy of access restrictions, and I 10:10:18

1 **think these access restrictions are one of the** 10:10:21
2 **examples given in the specification to** 10:10:25
3 **distinguish a protected network from simply a** 10:10:27
4 **network.** 10:10:30
5 Q. Okay. Thank you. 10:10:30
6 One housekeeping matter. Well, I 10:10:31
7 don't know if it's housekeeping. We'll see. 10:11:02
8 In Paragraph 3 of your declaration. 10:11:04
9 **A. Okay.** 10:11:12
10 Q. You state that you've been asked to 10:11:15
11 provide opinions regarding whether such a 10:11:16
12 matter of the challenged claims -- I'm not 10:11:19
13 reading it. I am paraphrasing it. 10:11:21
14 You say that you were asked to 10:11:24
15 provide opinions regarding whether the subject 10:11:26
16 matter of the challenge claims of the '484, 10:11:28
17 and then you say, quote: Are anticipated or 10:11:29
18 otherwise would have been obvious -- and the 10:11:34
19 sentence goes on. 10:11:38
20 You're not offering any opinion 10:11:39
21 on -- that the challenge claims of the '484 10:11:41
22 are anticipated by anything; are you? 10:11:46
23 **A. No, I don't think so.** 10:11:47
24 Q. Okay. 10:11:48
25 **A. Just obviousness.** 10:11:49

1 Q. Let's turn to Page 24 of your 10:12:02
2 declaration. 10:12:07
3 **A. Okay.** 10:12:10
4 Q. In Paragraph 41, and, Dr. Houh, I 10:12:18
5 saw you check your watch. I think you know if 10:12:23
6 you need a break at any time, just let me 10:12:25
7 know. 10:12:27
8 **A. Sure.** 10:12:27
9 Q. It states: I understand -- and 10:12:31
10 you're talking about Krantz. You say you 10:12:33
11 understand that Krantz's prior art, at least 10:12:34
12 under preAIA 35 U.S.C. Section 102I -- is that 10:12:37
13 a typo? What is 102I? 10:12:43
14 **A. Yeah, I'm not sure. I would have** 10:12:53
15 **to look at 102, but sometimes that letter** 10:12:56
16 **might be in parentheses, but I know that these** 10:12:59
17 **sections of U.S. code often have letters** 10:13:04
18 **involved in the numbering scheme. So this is** 10:13:08
19 **just my understanding. So I would have to** 10:13:11
20 **look at that.** 10:13:16
21 Q. Yeah. I'll represent to you that 10:13:17
22 preAIA 35 U.S.C. Section 102 doesn't have a 10:13:19
23 Subparagraph I. 10:13:25
24 **A. Okay. I would want to look at the** 10:13:26
25 **U.S. code. So I guess you've identified a** 10:13:33

1 **typo, but I understand that Krantz is prior** 10:13:36
2 **art generally.** 10:13:45
3 Q. So, Dr. Houh, you didn't make a 10:13:45
4 determination that Krantz is prior art. 10:13:47
5 You've just accepted that as a representation 10:13:49
6 from your counsel? 10:13:51
7 **A. I'm not a lawyer, so that's** 10:13:52
8 **probably one of the things that, you know,** 10:13:54
9 **counsel would have informed me, what section** 10:13:55
10 **of the U.S. code prior art applies under.** 10:13:57
11 Q. Okay. And then whether or not 10:14:00
12 Krantz is prior art is something you relied on 10:14:02
13 your counsel? Or did you make a separate 10:14:05
14 actual determination that Krantz is prior art? 10:14:11
15 **A. I mean, I've looked at certain** 10:14:39
16 **sections. So I've read these sections before.** 10:14:41
17 **I just don't know what it actually applies** 10:14:43
18 **under, but my understanding is that these** 10:14:46
19 **references are prior art.** 10:14:48
20 Q. And where did you get that 10:14:49
21 understanding? 10:14:50
22 **A. I think the understanding's from** 10:14:51
23 **the attorneys.** 10:14:53
24 Q. Okay. That was my question. 10:14:53
25 And just kind of to close the loop 10:15:11

on that, if you look at Paragraph 46 and you 10:15:13
talk about Herrmann here, and you also say 10:15:21
that it's -- you understand that it's prior 10:15:23
art under 35 U.S.C. 102I again; right? 10:15:26
A. That's what it says at the end. 10:15:32
Q. So whether 102I is the correct 10:15:35
statute or not, this is just an understanding 10:15:37
you got from your counsel? 10:15:39
A. That it's prior art. 10:15:41
Q. Understood. Right. Okay. 10:15:43
In Paragraph 43, you state that: 10:15:55
Krantz discloses a system in which a device 10:15:58
attempts to access a protected network, and 10:16:04
then you cite, for example, the abstract of 10:16:07
Krantz; correct? 10:16:11
A. Yes. 10:16:12
- - - 10:16:12
(Whereupon, copy of Krantz, is 10:16:12
received and marked as Exhibit 1505 for
Identification.)
- - -
BY ATTORNEY KUO:
Q. Let me hand to you a copy of 10:16:18
Krantz. This is Exhibit 1505. I apologize, 10:16:20
it printed kind of small. Can you take a look 10:16:28

at the abstract of Krantz? It's on the first 10:16:48
page. It's on the very first page. Just read 10:16:50
through it to yourself. 10:16:54
Are you done reading? 10:17:53
A. Yes. 10:17:54
Q. Can you just confirm for me that 10:17:55
the specific combination of words "protected 10:18:00
network" is not recited in the abstract of 10:18:05
Krantz? 10:18:12
A. I don't see the two-word phrase 10:18:26
"protected network" in the abstract of Krantz. 10:18:27
Q. Do you know if the phrase 10:18:31
"protected network" appears anywhere in 10:18:31
Krantz? 10:18:36
A. I mean, I don't have this 10:18:41
memorized. So I -- I don't -- I can't search 10:18:42
it like I can on a computer. 10:18:45
Q. Okay. So whether it does or not, 10:18:47
you just figured that out by searching, doing 10:18:50
a search for protected network? 10:18:52
A. If you're asking where the Krantz 10:18:55
specification uses the two-word phrase 10:18:57
"protected network" -- 10:18:59
Q. That's what I'm asking. 10:19:00
A. -- I would -- I would -- I would -- 10:19:01

1 **it would be much faster to search it given a** 10:19:04
2 **proper word index built up for the Krantz** 10:19:07
3 **reference.** 10:19:10
4 Q. Uh-huh. 10:19:10
5 **A. Or I could read it, but that would** 10:19:11
6 **take some time.** 10:19:15
7 Q. Right, but we can do that on our 10:19:16
8 own. The document says what it says. It 10:19:18
9 either uses the phrase "protected network" or 10:19:20
10 it doesn't use the phrase "protected network"; 10:19:22
11 right? 10:19:25
12 **A. It either uses it or not, but my** 10:19:25
13 **opinion is that where --** 10:19:28
14 Q. I understand your opinion, but my 10:19:29
15 question is simply about whether the phrase 10:19:30
16 "protected network" is recited within Krantz? 10:19:32
17 **A. I think that's a factual matter** 10:19:36
18 **that we could easily --** 10:19:38
19 Q. Okay. 10:19:40
20 **A. -- determine given the amount of** 10:19:40
21 **time, proper amount of time and resources.** 10:19:42
22 Q. Okay. So let's turn to Page 25 of 10:19:44
23 your report -- I'm sorry, of your declaration. 10:19:48
24 **A. Sure.** 10:19:53
25 Q. You understand when I say "report" 10:19:56

and "declaration" I'm just kind of using them 10:19:57
interchangeably; right? 10:19:59
A. Sure. 10:20:00
Q. Okay. In Paragraph 43, you have 10:20:00
what you call an annotated version of Figure 2 10:20:08
from Krantz; correct? 10:20:12
A. I think my version has color 10:20:17
annotations. I -- yes, it is annotated. 10:20:19
ATTORNEY KUO: Do you know what? Can 10:20:24
we go off the record? 10:20:30
CERTIFIED STENOGRAPHER: Off the 10:20:34
stenographic record at 10:20 a.m. 10:20:34
- - - 10:20:35
(Whereupon, a short recess was 10:20:35
taken.) 10:20:35
- - - 10:20:36
CERTIFIED STENOGRAPHER: Back on the 10:22:14
stenographic record at 10:22 a.m. 10:22:15
BY ATTORNEY KUO: 10:22:17
Q. Dr. Houh, apologies for the 10:22:24
interruption. Thank you for your patience. 10:22:26
I'm going to give you my laptop 10:22:29
computer that has a PDF of Exhibit 1503 on it 10:22:30
that's in color so you can see the color as 10:22:37
well. 10:22:39

1 **A. Thank you. Can you navigate** 10:22:40
2 **through the --** 10:22:45
3 Q. Yeah, yeah, however -- so if you 10:22:45
4 can go to -- is Page -- is Page 25, if that's 10:22:47
5 helps. 10:22:53
6 **A. Yes, I see it now.** 10:22:53
7 Q. Okay. So as you stated before, 10:22:54
8 your annotated version of Figure 2 of Krantz, 10:23:02
9 which is shown in color in Exhibit 1505, you 10:23:06
10 see that now on the screen? 10:23:11
11 **A. Yes.** 10:23:12
12 Q. And you have this red dotted shape 10:23:15
13 around network 213 and -- which is VLAN C, and 10:23:19
14 then VLAN B; right? 10:23:26
15 **A. I would not disagree with that** 10:23:37
16 **characterization, counselor. It looks about** 10:23:38
17 **right.** 10:23:40
18 Q. Just confirm for me, that red 10:23:41
19 dotted shape does not actually appear in 10:23:44
20 Krantz? 10:23:46
21 **A. That's an annotation, right. That** 10:23:48
22 **does not appear in Krantz.** 10:23:50
23 Q. And the red notation of protected 10:23:51
24 network above that dotted line shape, that's 10:23:53
25 also an annotation? 10:23:59

1 **A. Yes.** 10:24:00
2 Q. And by virtue of the fact that you 10:24:00
3 annotated it in red, it's supposed to refer to 10:24:02
4 that red dotted shape? 10:24:05
5 **A. Yeah, as well as the larger red** 10:24:07
6 **boxes that are shaded.** 10:24:10
7 Q. Right. The boxes that are within 10:24:12
8 that red dotted shape? 10:24:14
9 **A. Yes.** 10:24:16
10 Q. Okay. And as shown in this 10:24:16
11 Figure 2, there are the words -- I'm sorry. 10:24:26
12 Above VLAN C there are the words "less 10:24:37
13 restricted subset"; right? 10:24:39
14 **A. Yes.** 10:24:43
15 Q. And that's an annotation that you 10:24:44
16 added? 10:24:45
17 **A. I don't think so. I think less** 10:24:47
18 **restricted subset --** 10:24:48
19 Q. Well, you have Krantz. You can 10:24:50
20 check. 10:24:52
21 **A. Oh. Let me look. Oh, it is, yes** 10:24:54
22 **that's right.** 10:25:01
23 Q. Okay. And same for the words 10:25:02
24 "restricted subset" above VLAN B, that's an 10:25:05
25 annotation you added? 10:25:09

1 I'm sorry, Dr. Houh, I'm referring 10:25:28
2 to the annotated figure you have on Page 25 of 10:25:30
3 your declaration, and there is a -- you have 10:25:36
4 a -- Dr. Houh, if you look on the screen, 10:25:44
5 there is one of the red colored boxes, says 10:25:51
6 "VLAN B." 10:25:55
7 Do you see that? 10:25:56
8 **A. Yeah, yes.** 10:26:09
9 Q. Okay. And right above where it 10:26:11
10 says "VLAN B." it says "restricted subset"; is 10:26:12
11 that right? 10:26:15
12 **A. In the figure in my -- in my** 10:26:18
13 **declaration it does say that.** 10:26:21
14 Q. Right. And in the figure in your 10:26:22
15 declaration, those words "restricted subset," 10:26:26
16 that's something that you added; correct? In 10:26:29
17 other words, those words don't show up in the 10:26:32
18 actual figure from Krantz; right? 10:26:35
19 Dr. Houh, did you hear my question? 10:28:26
20 **A. I did, yes.** 10:28:28
21 Q. Okay. Do you need me to ask it 10:28:29
22 again? 10:28:45
23 **A. No. The original Figure 2 in** 10:28:46
24 **Krantz does not include the less restricted** 10:29:37
25 **subset and restricted subset above those** 10:29:41

respective boxes, but I do describe in -- if 10:29:45
you look around Page 43, in the areas around 10:29:49
there, about my discussion with respect to 10:29:51
Figure 2. 10:29:58
Q. Yeah. 10:29:59
I'm just asking you if -- and I 10:30:00
think you've answered it, that in the original 10:30:01
figure from Krantz, the words "restricted 10:30:08
subset" don't actually appear in that -- in 10:30:10
the Krantz figure, and that's correct; right? 10:30:15
A. That's correct, that they don't 10:30:19
appear in the original Figure 2 of Krantz. 10:30:20
Q. Okay. And then as is shown in 10:30:22
Figure 2, server 215, which is shown if you 10:30:28
look on your screen, Dr. Houh, for color, I'll 10:30:40
just refer to the color, 215 is shown in the 10:30:43
gray box; is that right? 10:30:46
A. Well, yeah, I do recall that, but 10:30:50
your screen got locked, so I can't see it. 10:30:52
Q. I'm sorry. 10:30:55
A. But, yes, server 215 is gray in 10:30:55
original color, annotated figure. In the 10:30:59
annotated figure. 10:31:03
Q. I guess you don't look enough like 10:31:24
me to unlock it with just -- all right. 10:31:27

1 That's okay. You do recall it was gray -- 10:31:30
2 **A. Yeah.** 10:31:32
3 Q. Okay. And at least that's shown in 10:31:33
4 even your annotated version of Figure 2, the 10:31:43
5 server 215 is not -- not located on network 10:31:47
6 213; correct? 10:32:01
7 **A. Network 213 is an example given in** 10:32:15
8 **Figure 2 is separate from server 215.** 10:32:18
9 Q. Okay. 10:32:23
10 **A. And where VLAN E is shown.** 10:32:23
11 Q. Okay. 10:32:28
12 **A. But I'm indicating here that's all** 10:32:33
13 **part of the claim protected network.** 10:32:34
14 Q. Right. And the protected network, 10:32:36
15 that's the box that you added to the Krantz 10:32:40
16 figure. It doesn't actually appear within the 10:32:44
17 Krantz figure; right? 10:32:46
18 **A. It's not in the original figure** 10:32:50
19 **from Krantz, that's right.** 10:32:51
20 Q. Okay. 10:32:52
21 ATTORNEY KUO: We've been going about 10:32:54
22 an hour and a half. Why don't we take a 10:32:54
23 10-minute break. Good? 10:32:57
24 THE WITNESS: Sure. 10:32:59
25 ATTORNEY KUO: Okay. 10:32:59

CERTIFIED STENOGRAPHER: Off the 10:33:00
stenographic record at 10:33 a.m. 10:33:01
- - - 10:33:01
(Whereupon, a short recess was 10:33:02
taken.) 10:33:02
- - - 10:33:02
CERTIFIED STENOGRAPHER: Back on the 10:44:49
stenographic record at 10:44 a.m. 10:44:50
BY ATTORNEY KUO: 10:44:55
Q. Just to finish up this section on 10:44:55
your summary at Krantz, in Paragraph 45 on 10:44:57
Page 26, you have the sentence: 10:45:03
Authentication may be made by server 215, 10:45:09
paren, which includes authentication module 10:45:14
217, close paren, which acts as a GateKeeper. 10:45:17
And I just want to confirm that for 10:45:23
purposes of your analysis, you've considered 10:45:28
the gray box, server 215, as the GateKeeper; 10:45:30
correct? 10:45:36
A. Yes, that's how it's labeled in the 10:45:37
annotated figure as well. 10:45:39
Q. Okay. It's not called a GateKeeper 10:45:40
in Krantz; correct? 10:45:41
A. I don't think it is. 10:45:44
Q. And server 215 at Krantz is a 10:45:45

RADIUS server? Yeah, feel free to look at 10:45:49
Krantz. 10:45:53
A. If you'd look at Paragraph 58 of 10:46:19
Krantz, it talks about in some embodiments 10:46:20
server 215 logically represents a RADIUS 10:46:22
server. 10:46:25
Q. Okay. Is there anything -- I'm 10:46:27
sorry. 10:46:32
ATTORNEY MICHALEK: Sorry, it's getting 10:46:33
updated here? 10:46:35
ATTORNEY KUO: Press the follow button. 10:46:36
ATTORNEY MICHALEK: I am. It's not 10:46:38
coming through. 10:46:44
- - - 10:46:45
(Stenographic reporter fixes 10:46:45
technical issue.) 10:46:45
- - - 10:46:45
BY ATTORNEY KUO: 10:46:45
Q. So before that little technical 10:47:48
break, you were referring me to Paragraph 58 10:47:51
where Krantz says that server 215 in some 10:47:54
embodiments is a RADIUS server; correct? 10:47:59
A. I did do that. 10:48:02
Q. Krantz doesn't give any other 10:48:05
examples of what server 215 could be, does it, 10:48:08

other than a RADIUS server? 10:48:12

A. Well, it says also in Paragraph 58: Although visually depicted by a single system, server 215 may include a separate network access server, NAS, a separate authentication server, and a separate shared accounting server. 10:48:18 10:48:21 10:48:23 10:48:27 10:48:30 10:48:32

The server logically represented by server 215 can be configured to communicate using the RADIUS protocol and more specifically may support the RADIUS attributes EAP message and message-authenticator. 10:48:34 10:48:36 10:48:40 10:48:42 10:48:46

Server 215 may have modules from a variety of different services loaded into system memory, such as, for example, internet information services, IIS modules, internet authentication services, IAS modules, and it goes on, but there are some examples in some of these embodiments. 10:48:51 10:48:53 10:48:56 10:49:07 10:49:10 10:49:14 10:49:17

Q. Right. And in Paragraph 58, those are just different ways of -- different architectures for a RADIUS server; right? 10:49:18 10:49:21 10:49:26

A. It's saying that different things may be included with server 215. 10:49:34 10:49:36

Q. And 215 is the RADIUS server? 10:49:39

1 **A. In some embodiments, server 215** 10:49:41
2 **logically represents a RADIUS server.** 10:49:43
3 Q. Right. So my question was: Other 10:49:45
4 than a RADIUS server, is 215 explained in 10:49:50
5 Krantz to be anything else? Can it be 10:49:57
6 something other than a RADIUS server? 10:50:00
7 **A. Well, sure, because this is only** 10:50:06
8 **saying some embodiments the server is a RADIUS** 10:50:07
9 **server, but also it says that server 215 may** 10:50:11
10 **include a separate authentication server.** 10:50:14
11 Q. Okay. What I want to understand, I 10:50:17
12 understand that it could be a RADIUS server, 10:50:23
13 but Krantz is saying it could be a RADIUS 10:50:27
14 server, but some other stuff. 10:50:28
15 **A. Okay.** 10:50:30
16 Q. What I want to understand is, does 10:50:32
17 Krantz say that server 215 can be something 10:50:37
18 that does not include a RADIUS server? 10:50:42
19 **A. Paragraph 58 does not limit 215 to** 10:50:46
20 **be only a RADIUS server. It's only saying** 10:50:48
21 **that in some embodiments, server is --** 10:50:51
22 **represents a RADIUS server -- logically** 10:50:54
23 **represents a RADIUS server, and furthermore,** 10:50:56
24 **the same paragraph talks about how server 215** 10:50:58
25 **may include these separate entities, such as a** 10:51:02

separate authentication server. 10:51:05

Q. Does it give any examples of a 10:51:06
server that does not include a RADIUS server? 10:51:09

**A. I mean, it's saying that only in 10:51:41
some embodiments is the server 215 logically 10:51:43
representing a RADIUS server, but it certainly 10:51:47
says in Paragraph 58 that: Although visually 10:51:50
depicted by a single system, server 215 may 10:51:55
include a separate authentication server and 10:51:58
other things at 215. So I think it's teaching 10:52:02
that certainly there is no limit in Krantz 10:52:06
that 215 is only a RADIUS server.** 10:52:10

Q. I'm not arguing with you. I'm 10:52:12
just -- what I'm asking you, and I understand 10:52:14
your testimony, that it's not limiting, I'm 10:52:17
asking you: Does Krantz give an example of 10:52:19
what could be 215, server 215, that does not 10:52:24
include a RADIUS server? 10:52:28

**A. I think that's what it's teaching, 10:52:31
because it's saying in some embodiments -- in 10:52:32
some embodiments, server 215 logically 10:52:35
represents a RADIUS server. So what that's 10:52:41
saying is is that there are other embodiments 10:52:43
where server 215 doesn't --** 10:52:45

Q. Right. Does it disclose any of 10:52:47

1 those other embodiments? Does Krantz disclose 10:52:49
2 any of those other embodiments? 10:52:53
3 **A. Krantz certainly says that server** 10:52:55
4 **215 may include a separate authentication** 10:52:57
5 **server. So there are other types of servers** 10:52:59
6 **that are included in server 215, and 215 does** 10:53:05
7 **not have to be a RADIUS server in all** 10:53:08
8 **embodiments.** 10:53:11
9 Q. Okay. A RADIUS server is a type of 10:53:11
10 authentication server; correct? 10:53:14
11 **A. I think that's one of the things** 10:53:17
12 **it's directed to, and certainly server 215,** 10:53:18
13 **Krantz is saying can include a separate** 10:53:22
14 **authentication server.** 10:53:25
15 Q. Back at the time of the invention, 10:53:26
16 what were other types of authentication 10:53:28
17 servers to the best of your recollection? 10:53:33
18 **A. I think there was something called** 10:53:37
19 **a Yellow Pages server. There is a Kerberos,** 10:53:38
20 **K-E-R-B-E-R-O-S, server, capitalized.** 10:53:45
21 Q. That's a brand? 10:53:51
22 **A. Maybe it's a protocol as opposed** 10:53:57
23 **to --** 10:53:59
24 Q. Well, RADIUS seems to be an acronym 10:53:59
25 for something, but Kerberos sounds more like a 10:54:02

1 company brand name? 10:54:05
2 **A. I wouldn't -- I wouldn't have** 10:54:09
3 **called it a single company's branded server,** 10:54:10
4 **but there is Kerberos -- there are Kerberos** 10:54:14
5 **servers that are -- describe the function as** 10:54:17
6 **opposed to the brand.** 10:54:20
7 Q. Okay. So Kerberos is more like -- 10:54:24
8 I think you said it is like a protocol? 10:54:26
9 **A. I would describe it more of a** 10:54:31
10 **protocol.** 10:54:34
11 Q. Okay. Do you know what Kerberos -- 10:54:34
12 how that works? 10:54:35
13 **A. It's been a while since I looked at** 10:54:43
14 **it, but at a high level, it grants these** 10:54:44
15 **things called tickets, once you've submitted** 10:54:48
16 **the proper credentials, and those tickets are** 10:54:50
17 **valid for use of specific resources for a** 10:54:52
18 **specific amount of time.** 10:54:54
19 Q. Okay. And that's also a user 10:54:55
20 authentication protocol? 10:54:58
21 **A. I understand that's been used for** 10:55:01
22 **user authentication to grant permissions for** 10:55:03
23 **network resources and log -- computer log-ins.** 10:55:06
24 Q. Okay. And Kerberos isn't mentioned 10:55:10
25 in Krantz anywhere? 10:55:14

1 **A. I mean, I don't have Krantz** 10:55:19
2 **memorized. I don't -- I don't recall that it** 10:55:20
3 **was, but I -- I would have to go search** 10:55:22
4 **Krantz.** 10:55:26
5 Q. And the other one you mentioned was 10:55:27
6 Yellow Pages. Is that also a protocol? 10:55:28
7 **A. That might be a brand or type of** 10:55:32
8 **server that can do network-based** 10:55:36
9 **authentication I think.** 10:55:41
10 Q. Do you recall how the Yellow Pages 10:55:48
11 worked? 10:55:50
12 **A. I believe there is a Yellow Pages** 10:55:52
13 **server to which credentials can be submitted.** 10:55:53
14 **I don't remember what happens after that.** 10:55:57
15 Q. Okay. Do you recall if it's 10:56:00
16 similar in that you basically have a database 10:56:03
17 of user names and passwords? 10:56:06
18 **A. Yes, I believe it did.** 10:56:09
19 Q. And that also was just user 10:56:12
20 authentication? 10:56:13
21 **A. I think that's one of the things** 10:56:14
22 **that it could have been used for, if I** 10:56:16
23 **remember correctly.** 10:56:19
24 Q. Okay. So other than user 10:56:20
25 authentication, Krantz doesn't disclose 10:56:30

anything about making sure that an access 10:56:36
device complies with any sort of security 10:56:43
policy; correct? 10:56:48
A. Can you repeat the question, 10:57:57
please? 10:57:57
Q. Sure. 10:57:59
So other than user authentication, 10:58:01
Krantz doesn't disclose anything about making 10:58:03
sure that an access device complies with any 10:58:05
sort of security policy; is that right? 10:58:08
A. Well, if you look in Paragraph 53 10:58:14
in my declaration, I do talk about how Krantz 10:58:17
also teaches about providing a configuration 10:58:21
file with the proper encryption protocol and 10:58:22
other necessary configuration information, the 10:58:25
client device is -- 10:58:39
Q. I'm sorry, where are you? 10:58:41
A. In the middle of Paragraph 53, 10:58:42
starting fifth line down. 10:58:43
Q. Oh. Okay. I see. 10:58:46
A. The client device is configured to 10:58:47
for compatible operation with the network, and 10:58:49
that's one thing that Krantz is teaching, and 10:58:52
this is in the section that it's motivating to 10:58:54
combine -- why a POSITA would be motivated to 10:58:56

1 **combine Krantz and Herrmann, and Herrmann is** 10:59:00
2 **disclosing a particular policy requiring that** 10:59:08
3 **a specific virus protection program be** 10:59:11
4 **available, for example.** 10:59:17
5 Q. Okay. But that's not my question. 10:59:18
6 My question was whether Krantz teaches 10:59:20
7 comparing the configuration of the access 10:59:32
8 device against the security policy to see if 10:59:36
9 it complies with that security policy? 10:59:39
10 **A. I mean, I think I rely on the** 10:59:50
11 **combination of Krantz and Herrmann with** 10:59:51
12 **respect to some of what you're asking about** 10:59:54
13 **and it's kind of laid out in my declaration.** 10:59:56
14 Q. And that's all I'm asking. 10:59:58
15 So as it pertains to comparing what 10:59:59
16 the device has with the security policy, 11:00:05
17 you're relying on Herrmann for that teaching; 11:00:08
18 is that right? 11:00:11
19 **A. Can you point me to a specific** 11:00:14
20 **claim element that you're looking at?** 11:00:15
21 Q. I'm just asking you the question. 11:00:19
22 **A. Well, if you look at Paragraph 88** 11:01:31
23 **through Paragraph 90 of my declaration --** 11:01:32
24 Q. Uh-huh. 11:01:36
25 **A. -- I talk about how: First, to the** 11:01:36

extent that one asserts that Krantz does not 11:01:39
disclose at least one security policy, 11:01:42
including the requirements that must be 11:01:43
satisfied, the combined system of Krantz and 11:01:44
Herrmann demonstrates it such as a security 11:01:48
policy requiring a presence of a particular 11:01:51
antivirus software be installed on a network 11:01:53
device as described in Herrmann. 11:01:56
And I go on to talk about in 11:01:58
Paragraph 90 about why a POSITA would have 11:02:01
been motivated to combine Krantz with 11:02:03
Herrmann, and that a POSITA would recognize 11:02:05
that having a secure policy checking for 11:02:07
antivirus software would merely be an 11:02:09
additional item for server 215 and its various 11:02:11
components to check in the authentication 11:02:15
process already disclosed by Krantz. 11:02:17
In that, Herrmann discloses that -- 11:02:23
well, like Krantz, Herrmann discloses that a 11:02:24
policy server 460 may enforce a variety of 11:02:26
different types of security policies or rules, 11:02:30
and that one such rule, to be authorized for 11:02:34
network access, would be a policy requiring 11:02:38
that a specific virus protection program is 11:02:40
operational on each client device that is 11:02:43

1 **connected to a network.** 11:02:45
2 **And I refer to 1506, which I think** 11:02:48
3 **is Herrmann, noting that it is critical that** 11:02:52
4 **all machines and network maintain updated** 11:02:57
5 **antivirus software so that the network is not** 11:03:00
6 **infiltrated by newly released viruses, and I** 11:03:04
7 **go on, but this is the section where I discuss** 11:03:04
8 **that, and yeah.** 11:03:07
9 Q. Right. 11:03:09
10 So my question was and is: The 11:03:09
11 checking of the access device configuration 11:03:23
12 against this carry policy, you rely on 11:03:28
13 Herrmann for that particular teaching; is that 11:03:32
14 right? 11:03:35
15 **A. Well, to the extent that one** 11:03:44
16 **asserts that Krantz does not disclose at least** 11:03:46
17 **one security policy, including requirements** 11:03:48
18 **that must be satisfied, I rely on the** 11:03:50
19 **combination of Krantz and Herrmann.** 11:03:52
20 Q. Can you do me a favor? I apologize 11:04:06
21 for hopping around, but can you go back to 11:04:09
22 Page 22 of your declaration. 11:04:14
23 **A. Okay.** 11:04:27
24 Q. And I understand that the copy you 11:04:27
25 have in front of you is black and white, but 11:04:29

there is a dotted box that's drawn around the 11:04:32
amoeba-shaped thing 210 and the other more 11:04:42
lima bean-shaped thing 205; right? 11:04:46
A. Yes, I see that. 11:04:51
Q. And that dotted line, which I'll 11:04:54
represent to you in the original is in red and 11:04:56
that you've annotated with the words 11:05:00
"protected network" in red above it, even 11:05:01
though it says "protected network 200," you've 11:05:05
added that dotted box; correct? 11:05:12
A. That's right, in red, yes. 11:05:17
Q. Yes. 11:05:18
**A. In my annotated figure. What 11:05:19
you're calling the original figure I think as 11:05:21
opposed to the original in the '484. So in 11:05:24
what you're calling the original in my 11:05:27
declaration, Figure 2 annotated, that's the 11:05:29
annotated one.** 11:05:33
Q. Yes. Thank you. Your 11:05:34
clarification is correct. 11:05:36
In the '484 patent version of it, 11:05:41
the solid line box around 210, 205, as well as 11:05:43
router 220 and 215; correct? You have -- I 11:05:55
believe you have a copy of the '484 patent to 11:06:03
refer to? 11:06:06

1 **A. Yes. In the original Figure 2,** 11:06:06
2 **there is a box that goes -- that includes** 11:06:07
3 **router and access point 215, but I believe** 11:06:12
4 **there is some discussion in the specification** 11:06:16
5 **of the '484 that says something about where** 11:06:17
6 **the access point may or may be from the best** 11:06:20
7 **of my recollection. I can go look for that if** 11:06:24
8 **you want me to.** 11:06:26
9 Q. Well, I just want to understand, is 11:06:27
10 there any significance as to why you drew the 11:06:28
11 box in your annotated to not include router 11:06:32
12 220 and access point 215, where in the '484 11:06:38
13 patent protected network 200, it was explained 11:06:42
14 to include those two? 11:06:46
15 Dr. Houh, you're welcome to look at 11:11:27
16 whatever you want to look at to answer my 11:11:30
17 question, but do you remember what my question 11:11:32
18 was? 11:11:37
19 **A. I believe I do.** 11:11:39
20 Q. Okay. 11:11:40
21 **A. So I think the border there that I** 11:15:02
22 **annotated is to point out that in the** 11:15:06
23 **specification itself, for example, if you look** 11:15:10
24 **at Column 5, around Line 51 or 52, at the end** 11:15:12
25 **of that line it says: Protected network 200** 11:15:20

is either physically or logically divided into a restricted subset 205 and a less restricted subset 210, period. 11:15:23 11:15:26 11:15:30

And that access to protected network 200 is possible through an access point 215 and an optional router 220, and so that if accesses to the protected network is through these other devices, then a person of ordinary skill would not understand that those routers and access points are in the middle of these other restricted and less restricted subsets. 11:15:33 11:15:34 11:15:37 11:15:42 11:15:48 11:15:57 11:16:00 11:16:03 11:16:07

And furthermore, if you look at Column 7, around Line 56, in the middle it starts: When embodied in a network switch, access point 215 includes a -- 11:16:08 11:16:11 11:16:21 11:16:25

Q. I'm sorry, I'm sorry, where are you? 11:16:27 11:16:28

A. Column 7, Line 56 in the middle. 11:16:29

Q. Okay. 11:16:32

A. When embodied in a network switch, access point 215 includes a series of communications ports, designated ports 305A through 305G, and configured for communication with devices, such as access device 230, 11:16:32 11:16:34 11:16:38 11:16:42 11:16:45

1 **router 220, less restricted subset 210 and/or** 11:16:48
2 **a restricted subset 205, and so I think a** 11:16:53
3 **person of ordinary skill would look at that** 11:16:55
4 **and also understand that in this embodiment,** 11:16:57
5 **it's describing that the access points because** 11:16:59
6 **I think 215 is configured to communicate with** 11:17:05
7 **210, less restricted subset 210 and/or** 11:17:11
8 **restricted subset 205, that it is well -- you** 11:17:14
9 **wouldn't communicate with yourself if you're** 11:17:19
10 **part of it.** 11:17:22
11 **So this is just, you know, pointing** 11:17:23
12 **out certain embodiments in it where the access** 11:17:24
13 **points appear to be discussed separately from** 11:17:29
14 **the protected network itself.** 11:17:30
15 Q. So notwithstanding that Figure 2 11:17:33
16 from the '484 patent shows what it shows, you 11:17:38
17 felt that drawing the dotted red box around 11:17:41
18 the elements that you did more accurately 11:17:45
19 reflects what's taught in the specification to 11:17:48
20 a person of ordinary skill in the art? 11:17:52
21 **A. Well, Figure 2 is only representing** 11:17:54
22 **some embodiments of the invention, not all of** 11:17:57
23 **them. And so I think there are other** 11:17:58
24 **embodiments, especially given the sections** 11:18:01
25 **that I'm referring you to, where it seems** 11:18:05

pretty clear that at least in some 11:18:06
embodiments, the access point, because it's 11:18:08
communicating with 210 and 205 in the less 11:18:13
restricted subset and restricted subsets of 11:18:17
the network, that it would be considered at 11:18:20
least on the boundary or outside the 11:18:25
restricted protected -- sorry, protected 11:18:28
network 200. 11:18:30
Q. Is there any significance, however, 11:18:39
to whether the router and access point are 11:18:41
considered to be within the protected network, 11:18:47
at the periphery of the protected network, or 11:18:49
outside of the protected network? 11:18:52
A. I mean, if you want to point me to 11:19:01
something I've said in my declaration or you 11:19:03
believe there is some significance -- 11:19:04
Q. No. I'm asking you: Do you think 11:19:05
there is any significance as to whether the 11:19:07
router and access point being located within 11:19:09
the network is somehow different from it 11:19:12
being -- within the protected network is 11:19:14
somehow different from it being at the 11:19:17
periphery or outside the protected network? 11:19:18
A. I mean, I think a POSITA reading a 11:19:31
specification '484 would understand that those 11:19:34

are the way -- the way the specification 11:19:36
discusses the access point with respect to the 11:19:40
protected network 200, that includes the less 11:19:43
restricted subset 210 and restricted subset 11:19:47
205, and the various embodiments discussed in 11:19:50
this specification, that there are these -- 11:19:52
that the '484 is -- is at least somewhat 11:19:55
flexible with respect to the specific 11:20:00
configurations and different embodiments. 11:20:03
Q. No. I understand your point that 11:20:05
the '484 says -- you know, gives some 11:20:06
embodiments, and whether it's inside a 11:20:10
protected network or at the periphery or 11:20:13
outside are all potential options. 11:20:16
I'm asking you as a purported 11:20:18
expert in networking, whether it matters 11:20:20
whether that -- whether the router and access 11:20:25
point are within the protected network or at 11:20:27
the periphery or outside the protected 11:20:31
network? 11:20:33
ATTORNEY BORDER: Object to the form. 11:20:35
A. I mean, I don't know if you're 11:20:37
asking generally, but generally, I don't think 11:20:40
I say much about that issue in this section, 11:20:43
but if there is a section in which my 11:20:46

analysis -- which I don't recall because I 11:20:48
don't have my declaration memorized, but we 11:20:53
can look, but I don't think that's the case, 11:20:57
where I relied on this specific analysis with 11:20:58
respect to my mappings and how the prior art 11:21:04
maps to this particular example. 11:21:08
Q. Dr. Houh, I'm not suggesting that 11:21:13
it does or it doesn't. 11:21:15
I'm just asking from a technical 11:21:17
standpoint, from networking, in a networking 11:21:19
art, does it make any difference whether the 11:21:21
router and access point is considered within 11:21:25
the protected network or just at the periphery 11:21:28
or outside the protected network? 11:21:30
ATTORNEY BORDER: Object to the form. 11:21:33
Q. And if you don't know, that's fine. 11:21:34
ATTORNEY BORDER: Object to the form. 11:21:36
A. I mean, I don't think I've 11:21:38
addressed that specific question in my 11:21:40
declaration, but if there is some place you 11:21:42
think my analysis depends -- 11:21:47
Q. I'm not saying that at all. I'm 11:21:49
asking you a question as a technical expert, 11:21:51
and if you can't answer that question, that's 11:21:55
fine and we'll move on. 11:22:02

1 **A. I mean, I think I have to** 11:22:07
2 **understand the specific context for that** 11:22:08
3 **question in order to answer it in more detail.** 11:22:10
4 Q. Are there contexts in which it does 11:22:14
5 matter, whether the router and access point 11:22:17
6 are inside the protected network or at the 11:22:19
7 periphery or outside the protected network? 11:22:22
8 ATTORNEY BORDER: Object to the form. 11:22:25
9 **A. I think that question is too vague** 11:22:28
10 **to give you a thoughtful answer to right now.** 11:22:33
11 Q. Okay. So you can't answer my 11:22:38
12 question today? 11:22:40
13 **A. I think it's very vague so.** 11:22:42
14 Q. Let's go to -- starting on Page 26 11:22:56
15 of your declaration at the bottom is heading: 11:23:03
16 B, Summary of Herrmann. 11:23:06
17 **A. Okay.** 11:23:09
18 Q. And we touched on one thing about 11:23:11
19 preAI, AI statement, so we'll just stick to 11:23:15
20 that. 11:23:21
21 In Herrmann, in Paragraph 47, you 11:23:22
22 state that -- and I'm paraphrasing, but you 11:23:29
23 state that Herrmann talks about whether a 11:23:31
24 client can gain access to protected network 11:23:34
25 resources; correct? 11:23:36

1 **A. I see some of those words there,** 11:23:39
2 **sure.** 11:23:40
3 Q. Yeah. 11:23:41
4 And shown in Figure 3 of Herrmann, 11:23:42
5 which is reproduced on Page 28 of your 11:23:45
6 declaration, there is a box 390 that says 11:23:49
7 "protected network or resources"; right? 11:23:54
8 **A. Yes.** 11:23:58
9 Q. So at least with respect to 11:24:00
10 Herrmann, when it was designating a network 11:24:01
11 that was protected, it indicated it as such; 11:24:07
12 right? 11:24:10
13 **A. I mean, if you're saying Herrmann** 11:24:13
14 **does use the phrase "protected network," I** 11:24:15
15 **think Krantz discloses a protected network.** 11:24:18
16 **It didn't have to use those same words to** 11:24:22
17 **disclose it.** 11:24:25
18 Q. At least with respect to Herrmann, 11:24:26
19 when it talks about a protected network, it 11:24:28
20 actually designates it as a protected network; 11:24:31
21 right? 11:24:36
22 **A. With respect to Herrmann, this** 11:24:38
23 **figure does use the phrase "protected** 11:24:40
24 **network."** 11:24:41
25 Q. Right. 11:24:42

1 **A. But you don't have to use those** 11:24:43
2 **same exact words to disclose the concept of a** 11:24:44
3 **protected network.** 11:24:47
4 Q. Well, we can debate that as much as 11:24:47
5 you want, but at least with respect to 11:24:50
6 Herrmann, it actually uses the word "protected 11:24:52
7 network" when it's describing a protected 11:24:54
8 network? 11:24:55
9 **A. I mean, if you want to debate this,** 11:24:56
10 **but this -- you know, you don't have to use** 11:24:57
11 **the exact same words as any reference to** 11:24:59
12 **describe similar things. That's just a truism** 11:25:03
13 **in language.** 11:25:07
14 Q. And the concept of protected 11:25:09
15 networks at the time of the invention was a 11:25:10
16 well-known concept; right? 11:25:12
17 **A. Krantz teaches a protected network.** 11:25:17
18 **A POSITA would have recognized that. Herrmann** 11:25:20
19 **happened to use the phrase "protected** 11:25:23
20 **network."** 11:25:25
21 Q. At the time of the invention, the 11:25:25
22 concept of a protected network and the term 11:25:28
23 "protected network" were well-known in the 11:25:31
24 art; correct? 11:25:33
25 **A. I've laid out in my declaration how** 11:25:35

1 **Krantz and Herrmann have disclosed protected** 11:25:38
2 **networks.** 11:25:40
3 Q. At the time of the invention, the 11:25:41
4 term "protected network" and the concept of 11:25:44
5 protected network were well-known in the art; 11:25:48
6 correct? 11:25:50
7 ATTORNEY BORDER: Object to the form. 11:25:51
8 **A. The term and the concepts were both** 11:25:51
9 **disclosed in either/or, Herrmann and Krantz.** 11:25:54
10 Q. And the term "protected network" is 11:25:57
11 not disclosed in Krantz; correct? 11:25:59
12 **A. I think I said I'd have to take a** 11:26:05
13 **look through there, but I would either have to** 11:26:08
14 **research it, given the appropriate amount of** 11:26:11
15 **resources and time, to make that** 11:26:13
16 **determination, but it's a factual issue which** 11:26:14
17 **can be easily determined in Krantz.** 11:26:16
18 Q. It's either there or it's not? 11:26:18
19 **A. The concept is there. Whether** 11:26:21
20 **the --** 11:26:22
21 Q. I'm sorry -- 11:26:23
22 **A. -- two-word phrase "protected** 11:26:23
23 **network" is there or not, that was the factual** 11:26:23
24 **issue that we could --** 11:26:26
25 Q. Right. 11:26:29

A. -- determine given the appropriate amount of time and resources. 11:26:29 11:26:30

Q. Right. 11:26:32

The words "protected network," whether they exist in Krantz or not, is something -- the document speaks for itself; right? 11:26:32 11:26:33 11:26:37 11:26:39

A. The document speaks for itself, but a POSITA would recognize that Krantz has disclosed the concept of a protected network. 11:26:40 11:26:41 11:26:44

Q. Even though it doesn't -- even though in my scenario it doesn't use the words "protected network"? 11:26:46 11:26:48 11:26:50

A. It doesn't have to use the true word phrase "protected network" to disclose the concept of a protected network. 11:26:51 11:26:53 11:26:55

Q. And even though a protected network was a well-known concept in the art, they chose not to use protected network to describe any of their components? 11:26:56 11:26:58 11:27:00 11:27:02

A. They chose to describe the well-known concept of a protected network not using -- without having to use the two-word phrase "protected network" in Krantz. 11:27:04 11:27:05 11:27:07 11:27:11

Q. That's your opinion? 11:27:16

A. That's -- that's part of my opinion as laid out in my declaration. 11:27:18 11:27:20

- - - 11:27:21

(Whereupon, copy of Herrmann, is received and marked as Exhibit 1506 for Identification.) 11:27:21

- - -

BY ATTORNEY KUO:

Q. So then in Herrmann, looking at Figure 3, they're shown a RADIUS server, correct, as 330? I'm sorry, you don't have a copy of Herrmann. Hang on a second. 11:27:22 11:27:24 11:27:31 11:27:38

Yeah, let me hand to you Exhibit 1506. That's Herrmann. 11:27:42 11:27:44

A. Figure 3 is described as an exemplary network access server environment. 11:28:45 11:28:46

Q. Uh-huh. 11:28:51

A. And in this particular example, the label in Figure 3 says it's a RADIUS server, and in the description of Figure 3, which also indicates that it's a diagram of an exemplary network access server environment, it does show that in this example it includes a RADIUS server. 11:28:53 11:28:55 11:28:58 11:29:04 11:29:08 11:29:11 11:29:14

Q. And you're referring to somewhere 11:29:16

in Herrmann. Can you tell me which paragraph? 11:29:19

A. I was referring to both Figure 3 and the specification of Herrmann starting at Paragraph 53. 11:29:22 11:29:24 11:29:30

Q. And other than the RADIUS server, does Herrmann give any other exemplary servers for providing authentication services? 11:29:46 11:29:48 11:29:57

A. I mean, Herrmann makes clear that Figure 3 is only an example, and at least in Paragraphs 54, 55, and 56, I do see that it is referring to it as a RADIUS server. I don't see any other alternative in those paragraphs. 11:30:16 11:30:17 11:30:21 11:30:25 11:30:28

Q. Okay. 11:30:30

A. But we can look through the rest of it and oftentimes, you know, there are -- yeah, patents do discuss alternatives. 11:30:31 11:30:33 11:30:39

Q. Well, you'll agree with me that -- well, maybe you won't, but I think you should, that just mentioning that they're alternatives isn't the same thing as listing alternatives; correct? 11:30:50 11:30:51 11:30:54 11:30:56 11:30:59

ATTORNEY BORDER: Objection. Form. 11:31:00

A. Well, I think given the knowledge of a POSITA, if they knew they were alternatives, mentioning that only in some 11:31:02 11:31:05 11:31:09

embodiments there is a RADIUS server kind of signals to a POSITA that it's not limited to only what's listed. 11:31:11 11:31:14 11:31:16

Q. The RADIUS -- is a RADIUS server -- is that a term of art for back in, you know, time of the invention? 11:31:26 11:31:35 11:31:42

A. I think it is a known acronym. I think that Krantz actually spells out what the acronym stands for. 11:31:45 11:31:50 11:31:52

Q. Uh-huh. 11:31:54

A. But I think it was known as an acronym. 11:31:54 11:31:58

Q. Is it a type of server? Is it a brand? Do you know? 11:32:00 11:32:02

A. I think vendors may have their own brand of RADIUS server, but I would more likely call it a type or a protocol that servers may implement. 11:32:05 11:32:08 11:32:12 11:32:16

Q. Similar to the -- oh, shoot. Kerberos? 11:32:17 11:32:23

A. Kerberos. 11:32:23

Q. Kerberos one? 11:32:24

A. Yeah, maybe similar to that. I would have to think is it really exactly parallel, but yeah, I mean, I think -- I think 11:32:26 11:32:28 11:32:32

1 **Herrmann discusses different vendors that have** 11:32:36
2 **their own RADIUS servers.** 11:32:38
3 Q. Okay. So RADIUS server worked a 11:32:41
4 particular way and perhaps the Kerberos -- 11:32:43
5 **A. Kerberos.** 11:32:46
6 Q. -- Kerberos work in a different way 11:32:47
7 and Yellow Pages work in maybe another 11:32:49
8 different way, but they're all for user 11:32:52
9 authentication? 11:32:54
10 **A. I believe they all can support user** 11:32:55
11 **authentication as part of what the -- what** 11:32:58
12 **the -- services they provide.** 11:33:00
13 Q. Okay. And then in -- going to the 11:33:01
14 next page of your declaration, on 11:33:11
15 Paragraph 49, your declaration, 11:33:13
16 Paragraph 49 -- I'm sorry, Paragraph 49. 11:33:24
17 **A. Okay.** 11:33:27
18 Q. And you might as well look at the 11:33:32
19 next page since it kind of bridges a little 11:33:34
20 bit. 11:33:36
21 You talk about how Figure 4, in 11:33:39
22 that system that includes an additional 11:33:46
23 policy, paren, Integrity, close paren, server 11:33:49
24 44; right? I'm looking at Paragraph 49. You 11:33:52
25 state in Paragraph 49: However, the system 11:34:11

1 includes an additional, quote, policy, open 11:34:13
2 paren, Integrity, close paren, server '484, 11:34:17
3 close quote, and then it goes on; right? 11:34:21
4 Dr. Houh, I'm just asking if that's 11:34:35
5 what's stated in your declaration? 11:34:37
6 **A. Well, I do see what's stated in my** 11:35:53
7 **declaration, but I'm just trying to determine** 11:35:54
8 **where the '484 came from that I've put in** 11:35:57
9 **quotes there.** 11:35:59
10 Q. Great, because that was going to be 11:36:00
11 my question too. Yeah. Can you figure that 11:36:02
12 out? Where does the '484 come from? 11:36:07
13 **A. Well, I mean, the Figure 4 is** 11:36:09
14 **clearly labeled "the policy Integrity server** 11:36:11
15 **with label of 460."** 11:36:14
16 Q. Uh-huh. 11:36:15
17 **A. And so is the specification -- and** 11:36:17
18 **I cannot find '484. So it may be just a** 11:36:20
19 **simple typo, but I mean, if I can search for** 11:36:23
20 **'484, I would do that in Herrmann, but I don't** 11:36:26
21 **see it as I'm scanning through it.** 11:36:30
22 Q. Okay. In all likelihood, you think 11:36:32
23 it's just a typo? 11:36:35
24 **A. That's what it looks like to me as** 11:36:38
25 **I'm sitting here right now.** 11:36:39

1 Q. All right. 11:36:41
2 So this additional policy Integrity 11:36:47
3 server, and we'll just forget about the '484 11:36:48
4 for the time being, this additional policy 11:36:51
5 Integrity server that's shown in Figure 4, 11:36:53
6 that's that box that's indicated by 460 as 11:36:58
7 shown in Herrmann? 11:37:05
8 **A. In Figure 4, it's shown as 460, and** 11:37:09
9 **in Paragraph 67, I only see 460 as well.** 11:37:12
10 Q. Okay. What is this Integrity 11:37:22
11 gateway server 450? 11:37:30
12 **A. If you look at Paragraph 66 of** 11:37:41
13 **Herrmann --** 11:37:42
14 Q. Okay. 11:37:44
15 **A. -- it says that: The IGW server or** 11:37:44
16 **Integrity gateway server 450 acts as a bridge** 11:37:47
17 **for translating communications between the EAP** 11:37:50
18 **client 311 and the RADIUS server of 330 for** 11:37:55
19 **authentication of the client advice 310 into a** 11:37:58
20 **format that is understood by the policy server** 11:38:02
21 **460. And then it goes on, but that's what** 11:38:04
22 **it's describing.** 11:38:08
23 Q. So is it saying that the Integrity 11:38:09
24 server needs to translate -- in layman's 11:38:10
25 terms, it needs to translate the information 11:38:14

1 from a RADIUS server before a policy server 11:38:17
2 can understand it? 11:38:22
3 **A. In this Figure 4, which is just an** 11:39:03
4 **embodiment, although it's saying it's a** 11:39:05
5 **further embodiment, and this -- it is saying** 11:39:08
6 **that the server 450 is acting as a bridge for** 11:39:14
7 **translating communications in this particular** 11:39:20
8 **preferred embodiment.** 11:39:23
9 Q. Got it. 11:39:24
10 In this policy Integrity server, 11:39:23
11 it's your opinion that the policy Integrity 11:39:34
12 server is what -- from Herrmann, checks the 11:39:39
13 access device to see if it meets the security 11:39:46
14 policy? 11:39:49
15 **A. In the middle. Paragraph 67, it** 11:40:18
16 **does say -- it's maybe just a little lower** 11:40:20
17 **than halfway down, if you look at the right** 11:40:24
18 **side of that column, there is a bold 460, I'm** 11:40:27
19 **starting just before that.** 11:40:31
20 Q. Are you looking at Herrmann or are 11:40:31
21 you looking at -- 11:40:33
22 **A. I'm looking at Herrmann.** 11:40:34
23 Q. Oh, thank you. 11:40:35
24 **A. Paragraph 67 in Herrmann. The** 11:40:36
25 **policy server 460 evaluates whether or not the** 11:40:38

1 **client device 310 has a correct up-to-date** 11:40:42
2 **version of the applicable security policy.** 11:40:45
3 **The policy server 460 also serves** 11:40:49
4 **in an enforcement role in the event a client** 11:40:53
5 **device does not have the correct policy** 11:40:56
6 **loaded, where the policy server 460 detects** 11:40:58
7 **some other problem, may instruct the NAS 320** 11:41:01
8 **to deny network access to a client device.** 11:41:03
9 Q. Right. So I think you answered my 11:41:09
10 question in the affirmative, that Herrmann in 11:41:11
11 your opinion discloses the auditing of the 11:41:16
12 device against the security policy? 11:41:19
13 **A. Herrmann discloses the policy** 11:41:26
14 **server serving as an enforcement role if it's** 11:41:30
15 **determined -- in this example, embodiment, if** 11:41:31
16 **it's determined whether the client device does** 11:41:36
17 **not have the correct policy loaded or the** 11:41:41
18 **server detects some other problem.** 11:41:43
19 Q. Okay. So is that a yes to my 11:41:45
20 question? 11:41:47
21 **A. I'm just telling you what Herrmann** 11:41:53
22 **is saying, that this policy server can serve** 11:41:55
23 **in an enforcement role when it determines that** 11:42:01
24 **the client device does not have the correct** 11:42:05
25 **policy loaded.** 11:42:07

Q. And it's your opinion that that's 11:42:08
the disclosing of auditing the device against 11:42:12
the security policy from the claim; is that 11:42:14
right? 11:42:17
A. With respect to claim element 1.2 11:43:05
in my analysis, I talk about Krantz disclosing 11:43:07
a policy auditor in Figure 2, audit the access 11:43:11
device using the at least one security policy, 11:43:14
and I talk about how Krantz does that. 11:43:19
In -- at least in section -- the 11:43:30
Paragraphs 92 through 102, I'm really 11:43:31
discussing how Krantz is disclosing a policy 11:43:41
auditor configured to audit the access device 11:43:44
using the at least one security policy. 11:43:48
Q. Uh-huh. 11:43:52
So are you relying on Herrmann for 11:43:58
the disclosure of policy audit or are you not 11:44:02
relying on Herrmann for the disclosure of the 11:44:04
policy audit? 11:44:09
- - - 11:44:10
(Clarification requested by the 11:44:10
stenographer.) 11:44:10
- - - 11:44:10
Q. Or are you not relying on the 11:44:10
Herrmann for the disclosure of policy audit? 11:44:12

1 A. Well, in those sections, I'm 11:44:17
2 relying really on Krantz, but if you look down 11:44:19
3 at 109, Paragraph 109, I talk about how for 11:44:24
4 the same reasons described above in 11:44:30
5 Paragraphs 88 to 90 -- 11:44:32
6 Q. Uh-huh. 11:44:35
7 A. -- which is directed to at least 11:44:36
8 one security policy, including requirements 11:44:47
9 that must be satisfied, and to the extent 11:44:49
10 Krantz has not disclosed that, Herrmann I'm 11:44:53
11 relying on to disclose part of that for a 11:44:57
12 virus definition update. You know, I'm just 11:45:02
13 summarizing, but you can see what it says in 11:45:08
14 88 through 90. 11:45:10
15 Q. So -- 11:45:12
16 A. But the combined system -- 11:45:13
17 Q. I'm sorry. Go ahead. 11:45:14
18 A. -- of Krantz and Herrmann would 11:45:15
19 disclose a policy auditor configured to audit 11:45:18
20 the access device using the at least one 11:45:21
21 security policy, and it's really the security 11:45:23
22 policy part that I'm discussing in -- the at 11:45:26
23 least one security policy, including the 11:45:31
24 premise that must be satisfied. To the extent 11:45:33
25 Krantz has not disclosed that, Herrmann does 11:45:36

do that, but if you want to look at just the 11:45:38
audit part of it, I talk about that audit part 11:45:41
in the paragraphs up to 102 I think. 92 to 11:45:48
102 or something like that, for the policy 11:45:53
auditor configured to audit the access device. 11:45:57
Q. Right. 11:46:10
So, I'm sorry, I apologize for the 11:46:10
confusion, but for the policy auditor, 11:46:14
Paragraphs 92 through 102, the discussion is 11:46:21
entirely about Krantz; correct? 11:46:35
A. In 92 to 102, the discussion is 11:46:49
really only about Krantz. 11:46:53
Q. Okay. Thanks. 11:46:55
In Paragraph 95 of your 11:46:56
declaration, you talk about Krantz being able 11:49:03
to receive credentials, and then going into 11:49:15
96, checking to see if those credentials match 11:49:21
what's on the server. Obviously, I'm 11:49:26
paraphrasing. Is that the thrust of it? 11:49:31
A. I mean, it says what it says, but I 11:49:41
wouldn't argue with your paraphrasing there. 11:49:43
Q. Okay. And by credentials, that's 11:49:46
things like user ID and password? 11:49:48
A. Well, as I explain in the previous 11:50:05
paragraph, the '484 patent explains that 11:50:08

1 **auditing an access device includes** 11:50:12
2 **authenticating a user or user device.** 11:50:14
3 Q. Uh-huh. 11:50:16
4 **A. And then it also goes on to say** 11:50:17
5 **that: In optional authentication user step** 11:50:18
6 **440, policy auditor 325 authenticates the** 11:50:25
7 **identity of access device and/or a user of** 11:50:29
8 **access device 230, and it goes on to say that:** 11:50:31
9 **The authentication may include receipt of a** 11:50:35
10 **username and password or the like, and I think** 11:50:38
11 **that's -- a person of ordinary skill would** 11:50:43
12 **understand that these received credentials are** 11:50:46
13 **like what's disclosed in the '484 patent as** 11:50:51
14 **part of auditing an access device and what** 11:50:54
15 **that includes as disclosed by the '484 patent.** 11:51:00
16 Q. Uh-huh. 11:51:05
17 Is auditing a device for compliance 11:51:08
18 with security policy the same thing as 11:51:10
19 authenticating the user? 11:51:13
20 **A. Well, I think the '484 explains** 11:51:16
21 **that auditing access device includes** 11:51:18
22 **authenticating a user and, you know, that's** 11:51:21
23 **what I explain in Paragraph 94.** 11:51:25
24 Q. Well, that's different from my 11:51:27
25 question. Whether auditing a device can also 11:51:28

1 include authentication is different in terms 11:51:32
2 of my question from whether authentication of 11:51:37
3 a user and auditing of a device are the same. 11:51:41
4 So -- and that's my question. Is 11:51:47
5 authentication of a user to the best of your 11:51:49
6 understanding the same or different than 11:51:52
7 auditing a device for compliance with a 11:51:57
8 security policy? 11:51:59
9 **A. Well, the '484 patent explains that** 11:52:03
10 **auditing an access device can include** 11:52:06
11 **authenticating a user, but it's not one to** 11:52:09
12 **one. So '484 is just saying that** 11:52:11
13 **authenticating a user can be part of auditing** 11:52:15
14 **an access device.** 11:52:21
15 Q. Right. So part of auditing an 11:52:22
16 access device could be making sure the user is 11:52:24
17 authorized, but it can include other stuff is 11:52:28
18 what you're saying? 11:52:32
19 **A. I mean, that's what the '484 patent** 11:52:39
20 **is teaching if you look in what I've cited to** 11:52:41
21 **in Paragraph 94.** 11:52:44
22 Q. So can you pull out the '484 patent 11:53:34
23 for me? 11:53:37
24 **A. Okay.** 11:53:38
25 Q. Let's look at Claim 1. 11:53:42

A. **Okay.** 11:53:53
Q. And in Claim 1, which is in 11:53:54
Column 16 starting around Line 6 or 7, it 11:53:57
starts "a policy auditor." 11:54:03
Do you see where I am? 11:54:05
A. **Yes.** 11:54:06
Q. It says: A policy auditor 11:54:07
configured to audit to the access device using 11:54:08
the at least one security policy, and then it 11:54:10
goes on. 11:54:13
So this is the policy auditor 11:54:15
audits the access device; correct? 11:54:18
A. **Sure. In part.** 11:54:23
Q. Okay. And then if you flip the 11:54:25
page, and we're looking at the Column 17, it's 11:54:28
Claim 23. 11:54:41
Do you see where I am? 11:54:42
A. **Yes.** 11:54:45
Q. It states: A network GateKeeper of 11:54:46
Claim 1 wherein the network GateKeeper is 11:54:48
further configured to authentic a user of the 11:54:51
access device. 11:54:53
Did I read that correctly? 11:54:55
A. **Yes.** 11:54:58
Q. So this is in addition to auditing, 11:54:58

1 you can authentic a user; correct? 11:55:01
2 **A. Well, this is in addition to all** 11:55:08
3 **the things that are required in Claim 1, that** 11:55:12
4 **the network GateKeeper of Claim 1, wherein the** 11:55:15
5 **network GateKeeper is further configured to** 11:55:20
6 **authentic a user of the access device.** 11:55:23
7 Q. Right. So the authentication of 11:55:24
8 the user is a separate inquiry from auditing 11:55:26
9 the access device using the security policy; 11:55:36
10 right? 11:55:39
11 ATTORNEY BORDER: Objection to the 11:55:40
12 form. 11:55:40
13 Q. According to the claim? 11:55:41
14 **A. It's a narrowing element that** 11:55:43
15 **further limits what the network GateKeeper is** 11:55:44
16 **further configured to do and that which the** 11:55:48
17 **network GateKeeper already comprises the** 11:55:52
18 **policy auditor configured to audit the access** 11:55:55
19 **device. You've already said that auditing,** 11:55:58
20 **it's not a one-to-one. Auditing the access** 11:56:00
21 **device is not limited to user authentication,** 11:56:02
22 **but can include user authentication.** 11:56:05
23 **So 23 is just saying that the** 11:56:07
24 **network GateKeeper is further configured to** 11:56:12
25 **authentic a user of the access device and that** 11:56:14

could be done through any of the mechanisms -- it could be done -- it could be met if the policy auditor -- auditing the access device included authenticating a user, which is what the specification clearly discusses, but Claim 23 doesn't -- is just saying that it's the network GateKeeper further configured to authentic a user of a -- of the access device. 11:56:17 11:56:26 11:56:29 11:56:35 11:56:36 11:56:41 11:56:44 11:56:46

So I don't think there is any conflict with auditing the access device. Claim 23 is further adding what the network GateKeeper must be configured to do. 11:56:53 11:56:55 11:57:01 11:57:05

Q. Right. It's an additional function? 11:57:07 11:57:10

A. Yes, which narrows -- it's a narrowing limitation. 11:57:12 11:57:16

ATTORNEY KUO: Can we go off the record for a second? 11:57:31 11:57:32

CERTIFIED STENOGRAPHER: Off the stenographic record at 11:57 a.m. 11:57:33 11:57:33

- - - 11:57:35

(Whereupon, a short recess was taken.) 11:57:35 11:57:35

- - - 11:57:35

CERTIFIED STENOGRAPHER: Back on the 12:04:03

stenographic record at 12:04 p.m. 12:04:03
BY ATTORNEY KUO: 12:04:07
Q. In your declaration, do you have 12:04:31
any discussion about the use of tag headers in 12:04:38
VLAN environments; correct? 12:04:43
A. That sounds right, if you want to 12:04:46
point me somewhere, but I do recall that. 12:04:49
Q. It would be in -- on Page 71. 12:05:04
A. Yes, I see that there. 12:05:21
Q. Okay. And Paragraph 121, it 12:05:22
states: Krantz explains that access point 209 12:05:27
can be configured as a VLAN-aware device, can 12:05:33
insert tag headers into data frames received 12:05:38
from client 205, paren, or any other computer 12:05:41
system on VLAN A, close paren, that are to be 12:05:45
transferred to VLAN B and/or VLAN C. 12:05:49
And so my question is: Based on 12:05:58
your knowledge as a person of ordinary skill 12:06:06
in the art, can you give me an explanation of 12:06:07
how VLANs insert tag headers and what tag 12:06:12
headers are in these data frames? And why 12:06:19
don't I break that down. Do you have an 12:06:31
understanding first of VLANs and tag headers? 12:06:32
A. Well, I mean, Krantz does describe 12:06:37
these things, but they're consistent with 12:06:40

1 **my --** 12:06:42
2 Q. They're consistent with your 12:06:43
3 understanding? Okay. 12:06:43
4 And so the tag headers, that's a -- 12:06:46
5 am I correct that's a part of the data that's 12:06:51
6 received from the client device? 12:06:55
7 **A. Well, if you look at Paragraph 61,** 12:07:04
8 **it talks about how a tag data frame is a data** 12:07:06
9 **frame that includes an indication, such as,** 12:07:11
10 **for example, a tag header, that identifies a** 12:07:13
11 **VLAN and/or frame classification associated** 12:07:15
12 **with a tag data frame.** 12:07:18
13 **A tag header can be inserted into a** 12:07:20
14 **data frame by a VLAN-aware device to indicate** 12:07:25
15 **data routing devices -- indicate to data** 12:07:28
16 **routing device 214, a VLAN ID of the VLAN from** 12:07:31
17 **which a tag data frame is received, and then** 12:07:36
18 **consistent with that description -- actually,** 12:07:39
19 **it's right here.** 12:07:42
20 **For example, in access point 209,** 12:07:43
21 **can insert a tag header into data from client** 12:07:44
22 **205 to indicate to data routing device 214** 12:07:50
23 **that the data was received from VLAN A and** 12:07:54
24 **that a tag header can also include other** 12:07:58
25 **control information that can be used by data** 12:08:03

1 **routing device 214 to classify a corresponding** 12:08:06
2 **data frame.** 12:08:10
3 **And so that's Paragraph 61 and** 12:08:12
4 **Paragraph 64, also consistent with that is** 12:08:18
5 **saying that access point 209 is the VLAN -- an** 12:08:23
6 **example of a VLAN -- Paragraph 64 talks about** 12:08:28
7 **how access point 209 can be configured as a** 12:08:41
8 **VLAN-aware device and can insert tag headers** 12:08:45
9 **into data frames received from client 205 or** 12:08:48
10 **any other computer system on VLAN A that are** 12:08:53
11 **to be transferred to VLAN B and/or VLAN C.** 12:08:56
12 Q. Okay. So -- I'm sorry. 12:09:01
13 **A. Yeah, and so that is showing that** 12:09:03
14 **it's actually the access point 209 that can be** 12:09:05
15 **configured or reconfigured to insert the** 12:09:09
16 **proper tag header, and I discuss this in this** 12:09:13
17 **section starting at this paragraph.** 12:09:17
18 Q. So -- 12:09:19
19 **A. So that --** 12:09:20
20 Q. I'm sorry. 12:09:21
21 **A. -- the data can be appropriately** 12:09:22
22 **routed to either -- I think if you look** 12:09:23
23 **further, either the restricted subset or less** 12:09:26
24 **restricted subset depending on the tag.** 12:09:28
25 Q. So the tag header itself, 12:09:31

regardless of what does the inserting of the 12:09:32
tag header or how the tag header gets there, 12:09:36
the tag header is part of the data that's 12:09:38
received from the client device; right? 12:09:40
A. Well, I mean, Krantz is pretty 12:09:46
clear that the access point 209 can insert tag 12:09:48
headers into data frames received from client 12:09:52
205. 12:09:55
Q. I heard what you read before. I'm 12:09:56
asking: I have data coming in from an access 12:09:58
device; right? You understand that? 12:10:02
A. Sure. 12:10:07
Q. Okay. That data coming in from the 12:10:07
access device has routing information, as well 12:10:10
as a payload, of whatever the message actually 12:10:16
is, as well as some other stuff; is that fair? 12:10:23
ATTORNEY BORDER: Objection. Form. 12:10:32
A. I don't think 61 or 64 say exactly 12:11:06
what you're asking there. 12:11:08
Q. I'm not asking that. I'm asking 12:11:10
you as a purported expert, about the data that 12:11:11
comes in from an access device that hits the 12:11:17
access point, I'm asking you what that data 12:11:20
stream -- what it looks like and -- I mean, do 12:11:23
you know? 12:11:27

1 **A. Sure.** 12:11:27
2 Q. Okay. 12:11:28
3 ATTORNEY BORDER: Objection. Form. 12:11:29
4 Q. Okay. So does that data stream -- 12:11:29
5 one of the things that it include is a tag 12:11:32
6 header; is that right? 12:11:35
7 **A. It doesn't necessarily have to** 12:11:37
8 **include that, and this is very consistent with** 12:11:38
9 **VLAN tags that I've implemented, which is that** 12:11:41
10 **network devices can actually add VLAN tags and** 12:11:45
11 **headers.** 12:11:50
12 Q. Okay. And that's fine, but that 12:11:50
13 tag header is, whether it's there or it's not 12:11:52
14 there -- I'm sorry, strike that. 12:11:55
15 If there is a tag header that's 12:11:59
16 included in the data from the access device, 12:12:01
17 that's part of the data that's coming from the 12:12:05
18 access device; right? 12:12:08
19 **A. Krantz, especially in Paragraphs 61** 12:12:10
20 **and 64, explicitly says that: Tag headers can** 12:12:13
21 **be inserted into the data frames received from** 12:12:17
22 **the client 205, which is the access device** 12:12:19
23 **mapped to.** 12:12:23
24 Q. So -- okay. 12:12:24
25 **A. And it's inserting these, and it** 12:12:25

can be configured to insert tag headers into 12:12:27
data frames received from client 205. 12:12:31
The situation being described in 12:12:34
Krantz is that these tag headers are actually 12:12:36
inserted into the data frames received from 12:12:38
the client 205. So I understand you want to 12:12:41
talk about generally, but I'm -- my 12:12:44
declaration talks about what Krantz is 12:12:49
specifically teaching and how it renders 12:12:51
obvious as a combination with Herrmann, the 12:12:55
challenged claims. 12:12:59
Q. Dr. Houh, I appreciate your 12:13:00
conclusions, and that's fine. I'm trying to 12:13:02
understand some of the technology from a 12:13:05
person who is an expert in this technology. 12:13:09
And so what I'm trying to 12:13:15
understand is: So you've said that data 12:13:16
coming in from an access device doesn't 12:13:19
necessarily have a tag header; right? 12:13:21
A. They don't necessarily have to have 12:13:24
VLAN tags. 12:13:26
Q. Okay. So when it hits VLAN-aware 12:13:27
device and assume it doesn't have a tag 12:13:29
header, what does the VLAN-aware device do? 12:13:31
A. The VLAN device generally -- and as 12:13:38

1 **specifically described in 61 and 64, Krantz** 12:13:43
2 **Paragraphs 61 and 64, they can actually insert** 12:13:47
3 **tag headers with appropriate values to** 12:13:52
4 **properly route the data to one VLAN or another** 12:13:58
5 **VLAN.** 12:14:02
6 Q. Okay. So -- 12:14:02
7 **A. So that other devices may route --** 12:14:04
8 Q. I apologize if I'm being kind of 12:14:09
9 dumb about this. I'm trying to understand 12:14:12
10 this. 12:14:14
11 So I have an access device that's 12:14:15
12 trying to access whatever computer resources, 12:14:19
13 call it another VLAN, and when it first comes 12:14:24
14 in, there is no tag header; right? 12:14:29
15 Are you with me so far? 12:14:33
16 **A. Sure.** 12:14:35
17 Q. Okay. So the data comes, hits the 12:14:35
18 VLAN-aware device, and because it's got no tag 12:14:38
19 header, is it the situation that the 12:14:43
20 VLAN-aware device says, I don't know where to 12:14:46
21 send you, and, therefore, I insert a tag 12:14:50
22 header so I can send you somewhere? Is that 12:14:53
23 how it works? 12:14:55
24 **A. I think that's a little -- the** 12:15:03
25 **VLAN-aware device can be configured to insert** 12:15:06

1 **a tag header so that the data can be** 12:15:09
2 **transferred to the appropriate VLAN -- the** 12:15:13
3 **VLAN device is configured for package received** 12:15:18
4 **from a particular client.** 12:15:23
5 Q. Okay. So if the access device 12:15:24
6 comes in without a tag header and the access 12:15:27
7 point inserts the tag header, that access 12:15:31
8 point has been configured so that if something 12:15:37
9 comes in without a tag header, it inserts 12:15:45
10 whatever tag header so it can go; is that 12:15:49
11 right? 12:15:54
12 **A. Yeah, generally, and the way Krantz** 12:15:55
13 **is describing it as well, the access point can** 12:15:58
14 **be configured to insert the proper tag header** 12:16:01
15 **so it can be routed to the proper place, that** 12:16:05
16 **the access point is configured to have packets** 12:16:08
17 **received from a client device to be routed to** 12:16:16
18 **so that it gets routed to the proper place** 12:16:19
19 **that the access device is configured.** 12:16:24
20 Q. Right, and that's based on the -- 12:16:28
21 that's based on how that access point was 12:16:31
22 configured; correct? 12:16:33
23 **A. And the access points can be** 12:16:34
24 **reconfigured to change that, but there is some** 12:16:37
25 **configuration, and Krantz is describing how** 12:16:40

access point 209 can be configured to insert 12:16:44
tag headers into frames received from a client 12:16:48
205 that will be transferred to either or VLAN 12:16:52
B or VLAN C. So whatever it's configured to 12:16:57
transfer it to, the access device inserts the 12:17:01
proper tag header. That's what Krantz is 12:17:04
disclosing. 12:17:06
Q. Okay. Let's go to Paragraph 59 of 12:17:06
your declaration, please. 12:18:37
A. Okay. 12:18:44
Q. And Paragraph 59 states: Krantz 12:18:45
discloses that, quote, in some embodiments, a 12:18:47
server on a network can provide a client with 12:18:50
limited access to the network, and then it 12:18:52
goes on further and talks about -- well, it 12:18:57
says what it says. 12:19:05
My focus is here on where it says: 12:19:07
In some embodiments, a server on a network can 12:19:08
provide a client, okay? 12:19:12
And then in Paragraph 60 -- I'm 12:19:14
sorry. So Krantz is talking about the server 12:19:16
performing this function; right? 12:19:20
A. Sorry, could you repeat that last 12:19:23
part of what you said there, please? 12:19:25
Q. Sure. 12:19:27

Krantz is talking about a server 12:19:27
performing the various functions that it 12:19:29
describes; is that right? 12:19:31
A. **In some embodiments, Krantz is** 12:19:33
disclosing the server doing that. 12:19:35
Q. And that's the server -- that's not 12:19:38
the client device; is that right? 12:19:44
A. **Well, yeah, I mean, the server is** 12:19:51
recited separately from client 405 in that 12:19:54
cited passage. 12:19:59
Q. Okay. And then Paragraph 60 talks 12:20:00
about a policy agent or Integrity agent that 12:20:03
receives various information. What Herrmann 12:20:08
explains is that the -- Herrmann talks about 12:20:20
an agent, right, on the client device? And 12:20:29
particularly, if you look at Page 4 of 12:21:01
Herrmann. So let me start over. It's a 12:21:08
little muddled right now. 12:21:16
In Paragraph 60 of your 12:21:19
declaration, you talk about policy agent or 12:21:21
Integrity agent 413; right? 12:21:24
A. **In Paragraph 60, yes.** 12:21:27
Q. Yeah, and then looking at the 12:21:29
Figure 4 of Herrmann, Figure 4 of Herrmann -- 12:21:30
A. **Yes.** 12:21:37

Q. -- the policy agent 413, that's 12:21:38
shown on the client device; correct? 12:21:41
A. In this example, embodiment shown 12:21:48
in Figure 4, that policy agent is within 310, 12:21:50
the client device. 12:21:55
Q. Okay. If you leave it to the 12:21:56
client device to say whether or not they 12:22:08
comply with the security policy or don't 12:22:13
comply with the security policy, doesn't that 12:22:14
run the risk of I guess the client device not 12:22:17
telling the truth? 12:22:33
Do you understand my question, 12:22:35
Dr. Houh? 12:22:36
A. I heard your question. 12:22:54
Q. Okay. Just checking. 12:22:55
A. So if you look at Paragraph 64 in 12:25:11
Herrmann, if you look in the middle of the 12:25:13
paragraph here, it talks about how there is 12:25:16
this extension DLA412, this is about six lines 12:25:28
down, communicates with another client side 12:25:33
component of a present invention, referred to 12:25:35
herein as a policy agent or Integrity agent 12:25:37
413, to retrieve information about the current 12:25:42
security policy in operation on the client 12:25:44
device 310. 12:25:47

The information collected by the 12:25:48
policy agent 413 is unpackaged by the EAP 12:25:50
client 311, together with material from 12:25:57
another EAP dynamic link libraries, e.g., 12:26:00
standard EAP access-request packet for a 12:26:09
particular authentication mechanism, and sent 12:26:12
to the NAS 320 for handling by the server-side 12:26:14
components. 12:26:18
What I want to point out though is 12:26:20
that the '484 patent basically includes the 12:26:21
similar level of a disclosure, which is I'm 12:26:25
looking at Column 11. 12:26:30
If you look at Line 39: In 12:26:35
optional obtained audit data set 450, policy 12:26:38
auditor 325 collects further data to perform a 12:26:43
security audit of access device 230 responsive 12:26:45
to security policy 330A or security policy 12:26:49
330B. In some embodiments, obtained audit 12:26:52
data step 450 includes sending system data 12:26:56
request to access device 230, router 220 or 12:27:00
access point 215. 12:27:03
The requested system data may 12:27:05
include, for example, operating system status 12:27:07
version updates, etc., antivirus software 12:27:10
status, information concerning devices 12:27:15

1 **connected to access device 230, Windows** 12:27:16
2 **registry information, MAC address, IP address,** 12:27:20
3 **cookies, status to applications executing on** 12:27:23
4 **access device 230 or the like.** 12:27:25
5 **And so it's a similar level of** 12:27:28
6 **disclosure here with respect to -- with** 12:27:31
7 **respect to both the Herrmann and '484, which** 12:27:35
8 **is none of it address what you're asking** 12:27:39
9 **about, which is couldn't they just make it up,** 12:27:41
10 **and so I don't think that '484 patent** 12:27:44
11 **addresses your question in any greater detail** 12:27:48
12 **than Herrmann addresses that same issue.** 12:27:52
13 Q. Well, whether that's true or not 12:27:55
14 isn't my question. My question is: I have to 12:28:00
15 go back, if you leave it to the client device 12:28:05
16 to say whether or not they comply with the 12:28:12
17 security policy or don't comply with the 12:28:14
18 security policy, doesn't that run the risk of 12:28:17
19 the client device not telling the truth? 12:28:20
20 **A. Well, it's the -- the agent is the** 12:28:25
21 **one collecting the information, but it's the** 12:28:28
22 **policy Integrity server that can restrict it** 12:28:30
23 **based on information reported --** 12:28:33
24 Q. Right. So -- 12:28:34
25 **A. -- in Herrmann, so it's the same** 12:28:35

level of disclosure in the '484. There is 12:28:39
this client-provided information, which could 12:28:41
be all made up and provide it to the server, 12:28:43
but neither the '484 -- '484 doesn't address 12:28:46
what happens in the case that the client can 12:28:49
misreport or lie, and it's the same level of 12:28:52
disclosure in Herrmann with respect to the 12:28:55
agent reporting information for the policy 12:28:57
server 460 to make a determination as to 12:29:00
whether -- we looked at this earlier, but I'll 12:29:05
just point you back to our previous 12:29:07
discussion, and so the '484 patent does not 12:29:09
any more -- does not have any more disclosure 12:29:13
about this particular issue where the agent 12:29:16
obtained audit data stuff and the request for 12:29:23
information could just return made-up 12:29:27
information. 12:29:31
Q. In the '484 patent, you talk about 12:29:37
policy auditor 325; right? 12:29:39
A. I did just mention that. 12:29:43
Q. Yeah, and policy auditor 325, as 12:29:44
shown in Figure 3A of the '484 patent, is part 12:29:47
of the GateKeeper 225; correct? 12:29:50
A. In the figure, it's shown as part 12:30:21
of the GateKeeper in Figure 3, which is an 12:30:23

example embodiment, but the description talks 12:30:26
about the policy auditor collecting data, and 12:30:28
it sends system data request to access device 12:30:34
230, and the requested data can include all 12:30:37
these things listed in Column 11, Lines, 12:30:40
about, 44 through 50, but there is nothing 12:30:44
preventing the system to actually just 12:30:48
misreport or lie, and again, it's the same 12:30:52
level of disclosure. 12:30:54
The '484 patent doesn't disclose 12:30:55
the client or in this case the access device 12:30:57
230 upon receiving a request for system data 12:30:59
making stuff up, and Herrmann has a similar 12:31:05
level of disclosure, which is that -- and I 12:31:08
don't think '484 addresses that issue anywhere 12:31:12
else that I can recall. If you think there 12:31:14
is, we can go take a look at it, but I think 12:31:17
Herrmann has the same level of disclosure 12:31:20
issue that you're highlighting. 12:31:22
Q. Dr. Houh, I'm not highlighting 12:31:24
anything. I'm just asking you the question: 12:31:26
Is the policy auditor 325 as shown in 12:31:28
Figure 3A part of GateKeeper 225? Yes or no? 12:31:33
A. As I described it, and it's 12:31:41
actually sending requests for system data to 12:31:43

the access device, in which the access device 12:31:44
can reply with some information, which now 12:31:47
it's -- the issue highlighted was a few 12:31:51
questions ago about the problem with a client 12:31:56
basically reporting data, which is the same 12:31:58
problem that's present in the '484 patent 12:32:00
that's not addressed about that. So Herrmann 12:32:03
has the same level of disclosure with respect 12:32:06
to the problematic issue of agents 12:32:08
self-reporting and maybe lying that the '484 12:32:10
patent does not address as either and has the 12:32:15
same problem. 12:32:17
Q. Let me ask it this way, okay? 12:32:18
Let's turn to the '484 patent, Figure 3A. 12:32:19
A. Okay. 12:32:33
Q. Okay. See the box that says 12:32:33
"GateKeeper 225"? 12:32:35
A. Yes. 12:32:38
Q. Within that box, GateKeeper 225, is 12:32:38
there another box that says "policy auditor 12:32:41
325"? 12:32:45
A. In this example embodiment, yes. 12:32:47
Q. Okay. Turn to the previous page, 12:32:49
Figure 2. Are you there? 12:32:52
A. Yes. 12:32:59

Q. Do you see the box that says 12:33:00
"GateKeeper 225"? 12:33:04
A. Yes. 12:33:06
Q. And GateKeeper 225 is the same 12:33:07
numbering as GateKeeper 225 in Figure 3A; 12:33:11
right? 12:33:14
A. Yes. 12:33:15
Q. And GateKeeper 225 is shown on 12:33:15
subset 205; right? 12:33:19
A. Yes. 12:33:22
Q. And subset 205 is the restricted 12:33:23
subset of the protected network; right? 12:33:28
A. I believe so. It's how I've 12:33:42
labeled it on Page 22. 12:33:44
Q. So this policy auditor that's 12:33:49
disclosed in the '484 patent is on the server 12:33:52
side, not the client device side; right? 12:33:57
A. The policy auditor 325 works by 12:34:01
sending in some embodiments system data 12:34:04
request to access device 230 and then getting 12:34:08
a report from access device back. And so 12:34:14
that's what's described in Column 11, Lines 39 12:34:18
through 50 at least. 12:34:22
Q. I didn't ask you where it's sending 12:34:25
data. I didn't ask you where it's getting 12:34:26

1 data from. I just asked you where it's 12:34:28
2 located. 12:34:30
3 **A. Yes, but it does work in a specific** 12:34:31
4 **way. Even though it's located within the** 12:34:33
5 **GateKeeper, it still has to query the access** 12:34:35
6 **device, which is self-reporting all this** 12:34:37
7 **information back to the policy auditor, and it** 12:34:40
8 **suffers from the same issue you asked about in** 12:34:46
9 **an earlier question where the access device** 12:34:49
10 **could just simply make up stuff.** 12:34:51
11 Q. And the claims -- 12:34:53
12 **A. The '484 patent doesn't** 12:34:54
13 **specifically address that issue, neither does** 12:34:55
14 **Herrmann, and they have the same level of** 12:34:58
15 **disclosure with respect to that issue.** 12:35:00
16 Q. And the claims require that the 12:35:01
17 GateKeeper, which includes that policy 12:35:03
18 auditor, are on the restricted subpart of the 12:35:06
19 protected network; right? 12:35:13
20 **A. Well, I mean, if you're asking** 12:36:06
21 **about, you know, Claim 1, which is network** 12:36:07
22 **GateKeeper comprising, at the very end it** 12:36:10
23 **says: The restricted subset of the protected** 12:36:13
24 **network, including the GateKeeper, and I** 12:36:14
25 **believe if we look at what I've mapped out to** 12:36:18

at least in part -- 12:36:23

Q. I'm just -- 12:36:24

A. -- is the -- 12:36:25

Q. Dr. Houh, I know what you've mapped 12:36:28

it to. The claim requires that the GateKeeper 12:36:30

be on the restricted subset of the protected 12:36:35

network; right? 12:36:37

A. The claim language says the 12:36:41

restricted subset of the protected network, 12:36:43

including the GateKeeper. 12:36:44

Q. Okay. 12:36:47

ATTORNEY KUO: I have nothing further. 12:36:48

We can go off the record. 12:36:55

CERTIFIED STENOGRAPHER: Off the 12:36:57

stenographic record at 12:37 p.m. 12:36:57

- - -

(Whereupon, a luncheon recess is

taken at 12:37 p.m.)

* * * * * * * * *

A F T E R N O O N S E S S I O N
(1:24 p.m.)
CERTIFIED STENOGRAPHER: Back on the 01:24:20
stenographic record at 1:24 p.m. 01:24:21
01:24:23
EXAMINATION BY ATTORNEY MICHALEK: 01:24:23
BY ATTORNEY MICHALEK: 01:24:24
Q. Good afternoon, Dr. Houh. 01:24:27
How was lunch? 01:24:28
A. It was good. Thank you. How was 01:24:29
yours? 01:24:30
Q. It was good. Thank you. 01:24:31
What did you have? 01:24:32
A. Salmon and chicken and dumplings. 01:24:32
Q. Okay. Well, if we need a break at 01:24:35
any time during this session, of course this 01:24:38
isn't a marathon, so let us know and we'll 01:24:41
take a break and we'll pick up after the 01:24:43
break. 01:24:45
A. Thank you. 01:24:45
Q. You understand that this part of 01:24:47
your deposition is to testify with respect to 01:24:48
your opinions in, and I'll read it off, IPR 01:24:52
2024-00676 with respect to U.S. Patent 01:24:55
Number 8677450? 01:25:03

1 **A. I don't know the numbers offhand,** 01:25:08
2 **but '450 patent sounds right.** 01:25:09
3 Q. '450 patent sounds right? 01:25:13
4 **A. Yeah.** 01:25:15
5 Q. And you understand that you're 01:25:15
6 still under oath from this morning? 01:25:16
7 **A. Yes, I do.** 01:25:19
8 Q. And can you think of any reason why 01:25:20
9 you wouldn't be competent to testify regarding 01:25:22
10 your opinions at this time? 01:25:25
11 **A. No.** 01:25:26
12 Q. Okay. 01:25:29
13 - - - 01:25:29
14 (Whereupon, '450 patent, is 01:25:29
15 received and marked as Exhibit 401 for
16 Identification.)
17 - - -
18 BY ATTORNEY MICHALEK:
19 Q. We're going to mark as Exhibit -- I 01:25:29
20 think it's been premarked as Exhibit 401. 01:25:33
21 Handing to you what's a copy of the '450 01:25:38
22 patent. 01:25:40
23 ATTORNEY MICHALEK: Counsel, I think 01:25:44
24 you have a copy. Are you good? 01:25:44
25 ATTORNEY BORDER: I'm good. Thank you. 01:25:46

1 ATTORNEY MICHALEK: While we're at it, 01:25:48
2 I'll also hand to you what has been already 01:25:48
3 marked as Exhibit 1403. 01:25:51
4 - - - 01:25:53
5 (Whereupon, document previously 01:25:53
6 marked Exhibit 1403, is received and marked as
7 Exhibit 1403 for Identification.)
8 - - -
9 **A. Thank you.** 01:25:55
10 **- - -** 01:25:55
11 **(Whereupon, document previously** 01:25:55
12 **marked Exhibit 1405, is received and marked as**
13 **Exhibit 1405 for Identification.)**
14 **- - -**
15 **(Whereupon, document previously** 09:10:36
16 **marked Exhibit 1406, is received and marked as**
17 **Exhibit 1406 for Identification.)**
18 **- - -**
19 ATTORNEY MICHALEK: I'll hand you 01:26:01
20 what's been previously marked as Exhibit 1405, 01:26:03
21 and I'm handing to you what his been 01:26:04
22 previously marked as 1406. 01:26:19
23 **A. Thank you.** 01:26:22
24 ATTORNEY MICHALEK: And for the court 01:26:22
25 reporter -- we can get you copies of that at 01:26:23

1 the end here. 01:26:26
2 BY ATTORNEY MICHALEK: 01:26:27
3 Q. And my first question for you, 01:26:28
4 Dr. Houh, is: Can you skim through those 01:26:29
5 exhibits I just handed to you and see if you 01:26:32
6 see anything that's amiss or anything that is 01:26:34
7 not what they purport to be? 01:26:37
8 **A. Everything looks in order and it's** 01:27:31
9 **nice the declaration is a color copy.** 01:27:34
10 Q. Glad. 01:27:36
11 Before we get started on this 01:27:40
12 particular IPR or even the other IPRs in this 01:27:42
13 case, have you ever testified or analyzed or 01:27:45
14 opined on the Krantz and Herrmann references 01:27:47
15 before? 01:27:49
16 **A. Well, I think at the previous** 01:27:54
17 **deposition I did.** 01:27:55
18 Q. Outside of this case, outside of 01:27:56
19 the IPRs that are at issue in this case? 01:27:59
20 **A. I mean, I don't think I have, but** 01:28:06
21 **I'm not totally certain of that.** 01:28:07
22 Q. What'd you do to prepare for your 01:28:16
23 deposition? 01:28:16
24 **A. I reviewed some documents. I met** 01:28:17
25 **with Scott.** 01:28:19

Q. Your counsel? 01:28:22
A. Yes. 01:28:23
Q. Or counsel here today, Scott 01:28:23
Border? 01:28:25
A. Yes. 01:28:26
Q. Okay. When did you review those 01:28:27
documents? 01:28:28
A. Probably starting three or four 01:28:33
days ago and then through yesterday. 01:28:34
Q. Through yesterday. For about how 01:28:36
long? 01:28:37
A. I don't know, I probably spent four 01:28:42
or five hours, maybe six hours, four to six 01:28:44
hours'ish. 01:28:47
Q. And when did you meet with Scott? 01:28:47
A. Yesterday. 01:28:51
Q. For about how long? 01:28:53
A. For about 15 minutes. 01:28:55
Q. Okay. And what did you guys talk 01:28:56
about? 01:28:59
A. Just preparing for today. 01:29:00
Q. What do you mean by that? 01:29:03
A. Just to talk about what I should 01:29:08
review. We talked about issues related -- 01:29:11
related issues. 01:29:19

Q. Okay. What type of related issues? 01:29:19
ATTORNEY BORDER: Counsel, let's not 01:29:23
get into our conversations that we had in 01:29:24
preparing for this. 01:29:25
ATTORNEY MICHALEK: Are you taking the 01:29:27
position that these are privileged? 01:29:27
ATTORNEY BORDER: I'm taking the 01:29:29
position that our conversations were 01:29:29
privileged. 01:29:31
ATTORNEY MICHALEK: Okay. You're 01:29:33
taking the position that the conversations 01:29:34
between you and Mr. Houh are covered by the 01:29:35
attorney-client privilege? 01:29:40
ATTORNEY BORDER: Attorney-client work 01:29:42
product. Sorry, attorney work product. 01:29:43
BY ATTORNEY MICHALEK: 01:29:50
Q. Dr. Houh, did you speak -- and this 01:29:51
is a yes-or-no question, did you speak with 01:29:53
Mr. Border during this lunch break? 01:29:56
A. Yes. 01:29:58
Q. For about how long? 01:29:58
A. Over lunch. We didn't talk about 01:30:03
the -- this case. We just talked. 01:30:06
Q. You did not talk about this case? 01:30:10
A. No. 01:30:11

Q. What did you talk about? 01:30:12

A. We talked about Scott's recent trip to London and Paris. 01:30:14 01:30:16

Q. And what did he say about that? 01:30:18

A. He talked about where he went, different areas, museums. I talked about how I've been to London and then Paris a long time ago. Just talked about his family vacation. 01:30:21 01:30:23 01:30:27 01:30:29

Q. Can we turn to Paragraph -- I guess Page 20 of your report, which has been marked as 1403. 01:30:36 01:30:41 01:30:43

A. Okay. 01:30:48

Q. I'd like to direct you to Paragraph 42 where it says: Krantz is generally directed to computer-based systems and method for facilitating control access to protected networks and in particular increasing the level of automation when provisioning and configuring a computer system to access a network. 01:30:54 01:30:54 01:30:57 01:31:01 01:31:04 01:31:07 01:31:09 01:31:12

Do you see that language? 01:31:13

A. I do. There appears to be a missing open quote, which I think goes between "particular" and "increasing." 01:31:53 01:31:54 01:31:56

Q. Do you know what provisioning and 01:31:58

1 configuring are? 01:32:01
2 **A. I mean, generally.** 01:32:04
3 Q. Generally, what are they? 01:32:08
4 **A. Well, in a very general context,** 01:33:11
5 **configuring is often used to talk about --** 01:33:12
6 **includes things such as setting up, I think it** 01:33:17
7 **was settings or installing software. It would** 01:33:22
8 **include those kind of things in order to** 01:33:31
9 **achieve a goal. So you can configure, for** 01:33:33
10 **example, addresses or gateways in a computer** 01:33:38
11 **system to access a network generally speaking.** 01:33:44
12 **Provisioning often refers to kind** 01:33:48
13 **of setting up a system in a way for a** 01:33:50
14 **particular device, like you provision a** 01:33:57
15 **telephone number for a particular account so** 01:34:01
16 **that that telephone can then be -- be that** 01:34:05
17 **number. So I've heard those words refer to** 01:34:09
18 **examples such as that.** 01:34:13
19 Q. Okay. Let's take it one at a time 01:34:15
20 so I understand. 01:34:17
21 So configuring -- so configuring, 01:34:18
22 for example, would be addresses or gateways in 01:34:23
23 a computer -- you said, "so you can configure, 01:34:24
24 for example, addresses or gateways in a 01:34:26
25 computer system to access a network." How 01:34:28

1 would you configure an address or a gateway? 01:34:32
2 What is that? 01:34:37
3 **A. Well, sometimes they can be done** 01:34:37
4 **manually. So a user may open up a particular** 01:34:39
5 **file and enter those things manually.** 01:34:43
6 **Sometimes they can be done automatically** 01:34:47
7 **through use of various protocols, such as** 01:34:49
8 **DHCP, which can provide both an address and a** 01:34:51
9 **gateway address and other networking** 01:34:55
10 **parameters so that the -- a computer can** 01:34:58
11 **automatically be configured.** 01:35:03
12 **Now, those are just examples of** 01:35:05
13 **where I've heard that term and used that term.** 01:35:07
14 Q. And you said you've heard that term 01:35:12
15 or used that term. Was that in a different 01:35:13
16 case or different experience, what was it? 01:35:16
17 **A. Well, just generally speaking. I** 01:35:18
18 **mean, I worked in networking for a long time.** 01:35:19
19 Q. Okay. And provisioning -- you gave 01:35:22
20 an example, you provision a telephone number 01:35:28
21 for a particular account. How would you 01:35:30
22 provision or what would be example of 01:35:32
23 provisioning in like the cybersecurity or the 01:35:35
24 networking space? 01:35:37
25 **A. Well, for example, if you wanted a** 01:35:39

telephone service from a telephone network 01:35:44
provider, you might go into a store and order 01:35:46
a new phone and the network itself would 01:35:54
provision to provide your phone service and 01:36:01
any particular services that were requested. 01:36:07
So I've heard that word used and used that 01:36:09
myself in referring to examples such as that. 01:36:13
Q. Okay. And that would be -- would 01:36:16
telephone, would that be the same as 01:36:18
cybersecurity or networking? 01:36:20
A. Well, I mean, telephone is a 01:36:23
communication -- utilizes a communication 01:36:25
network. 01:36:27
Q. Okay. Could you review anything, 01:36:31
any examples that maybe aren't telephones, but 01:36:32
that would relate to, you know, some type of 01:36:36
the networking that we're talking about in 01:36:39
this case? 01:36:41
A. Can you repeat, please? 01:41:23
Q. Could you review anything, any 01:41:29
examples that maybe aren't telephones, but 01:41:31
that would relate to some type of networking 01:41:33
that we're talking about in this case? 01:41:36
ATTORNEY BORDER: Objection. Form. 01:41:42
A. I'm sure there is some examples 01:41:44

from the '450 patent itself about configuring the access point in response to the result of applying the security policy, and then in Krantz, Krantz talks about, in a different paragraph than the one cited in Paragraph 42 of my declaration, in Paragraph 14 it talks about what would be advantageous, our systems, methods, computer program products, and data structures for increasing the level of automation when provisioning and configuring a computer system to access the network, and if you look at the background up to that point, it's consistent with that description about configuring and provisioning a system to access a network. So those would be examples -- 01:41:45 01:41:48 01:41:56 01:41:59 01:42:03 01:42:05 01:42:09 01:42:14 01:42:17 01:42:20 01:42:23 01:42:26 01:42:27 01:42:33 01:42:35 01:42:37

Q. What do you mean by that, "consistent"? If you look at the background, it would be consistent? 01:42:38 01:42:38 01:42:41

A. Yeah, I mean, that's -- 14 is essentially a summary of what would be advantageous for increasing the level of automation when provisioning and configuring a computer system to access a network, and if you look at the background and relevant arts 01:42:42 01:42:45 01:42:49 01:42:51 01:42:56 01:43:00

section, it talks about what users have to do, how they have to connect, and those are all consistent with the description of provisioning and configuring a computer system to access a network, but more of a -- 01:43:03 01:43:06 01:43:10 01:43:11 01:43:13

Q. So -- 01:43:16

A. -- a less audited way -- 01:43:17

Q. Before we go there though, because I think that's helpful, so I'm looking at -- if I'm following you correctly, you're talking about the background and relevant art in Paragraph 3 or that's the heading in Paragraph 3 of Krantz so you follow along? 01:43:19 01:43:21 01:43:23 01:43:25 01:43:27 01:43:29

A. Yes. 01:43:32

Q. Okay. So, for example, Paragraph 10 says -- of Krantz says: Typically, these services require that a user plug a cable into a network interface card and a mobile computer system, paren, or use a wireless network interface card to initiate a connection and then open a Web browser. 01:43:33 01:43:34 01:43:38 01:43:41 01:43:44 01:43:47 01:43:50

So in that paragraph, is that what we're -- or is that an example of what we're talking about? 01:43:52 01:43:53 01:43:57

A. Well, I think this is an example of 01:44:00

1 **physically configuring a system such as, you** 01:44:02
2 **know, you have to plug it into something.** 01:44:04
3 Q. Provisioning too? Is that 01:44:06
4 provisioning also? 01:44:08
5 **A. Well, I would say that's less -- I** 01:44:10
6 **would say that's less about provisioning in** 01:44:15
7 **that particular example.** 01:44:16
8 Q. So what's the difference between 01:44:17
9 provisioning and configuring then in a network 01:44:19
10 analysis? 01:44:21
11 **A. Well, for example, like I saw** 01:44:36
12 **talking about with the telephone network,** 01:44:38
13 **oftentimes when they describe adding a new** 01:44:40
14 **phone number or attaching services to an** 01:44:43
15 **account, they'll often talk about a way you're** 01:44:44
16 **provisioning those services.** 01:44:48
17 **You may have to do some** 01:44:50
18 **configuration to provision them, but that's** 01:44:51
19 **the way generally I've heard people talk about** 01:44:54
20 **it in the past, that you're provisioning a** 01:44:56
21 **phone number with certain services.** 01:44:59
22 **It doesn't tell you how or what.** 01:45:03
23 **That's just what they call it, and then there** 01:45:05
24 **may be some specific configuration required on** 01:45:12
25 **a device as I -- an example that I described** 01:45:15

earlier about connecting say a Windows or UNIX 01:45:20
device to an IP network where configuring it 01:45:24
you have to -- may include editing certain 01:45:31
files, manually entering some data, or using 01:45:34
the appropriate protocol that automatically 01:45:36
gets certain parameters. 01:45:38
Q. What about software incapabilities, 01:45:43
would provisioning or configuring address 01:45:46
those? 01:45:48
A. I mean, I haven't really addressed 01:45:59
any specific issues like that in my 01:46:00
declaration. Are you referring to something 01:46:02
I've written? 01:46:03
Q. Well, let's circle back on that. 01:46:09
Do you know if Herrmann discloses 01:46:11
provisioning and configuring a computer 01:46:13
system? 01:46:16
A. I was just looking at the 01:50:20
background of invention section of Herrmann, 01:50:26
and while I don't think I saw, hopefully I 01:50:28
didn't miss it, the use of the word 01:50:34
"configuration" or some root or variant 01:50:36
thereof or provision, it does describe 01:50:37
situations which would be understood, like it 01:50:40
talks about users can connect to the internet. 01:50:44

They can move their mobile devices around or maybe it was laptops. 01:50:47 01:50:49

Yeah, for example, Paragraph 5: Many users now have laptop computers that can be connected to networks at home and work and in numerous other locations. 01:50:52 01:50:53 01:50:57 01:51:00

I think it would be understood that in order to have a laptop connect at home and at work, that the proper protocols would be used to actually load up those things, such as IP addresses and gateway addresses and subnet mass and things like that, such as required -- such as available when using the DHCP protocol, and that would entail having those addresses updated on various different networks that a user moving a laptop between would need. 01:51:03 01:51:05 01:51:10 01:51:17 01:51:21 01:51:25 01:51:29 01:51:33 01:51:38 01:51:40 01:51:44

Q. Let's go to Paragraph 141 of your report, please. It's on Page 85. 01:51:47 01:51:50

A. What paragraph did you say? 01:51:57

Q. Page 1 or, excuse me, Paragraph 141 on Page 85. 01:51:58 01:52:01

THE WITNESS: Was I supposed to put this on? 01:52:17 01:52:18

CERTIFIED STENOGRAPHER: No. 01:52:21

A. Okay. I'm there. 01:52:22

Q. Towards the middle you say: For instance, Krantz identifies that one problem in the prior art systems was that, quote, software incapabilities must be worked out by a user that may lack technical expertise or desire to reconfigure software for compatibility with the service. 01:52:23 01:52:24 01:52:27 01:52:30 01:52:33 01:52:36 01:52:39

Do you see that? 01:52:42

A. Yes. 01:52:42

Q. Okay. So what do you mean when you're talking about "software incapabilities"? 01:52:43 01:52:45 01:52:46

A. So Krantz, for example, in Paragraph 6 is describing situation in which where users talking to an ISP or internet service provider representative with general information and then they -- ISP can provide the user with username and password, and then in many cases the ISP also sends via a postal or other delivery service access software, for example, a dialer Web browser, etc., and/or hardware, for example, a DSL modem or cable modem that must be installed at a computer system. 01:58:09 01:58:11 01:58:19 01:58:24 01:58:27 01:58:32 01:58:35 01:58:39 01:58:41 01:58:45 01:58:48 01:58:50

1 **So it goes on to say that: For the** 01:58:54
2 **user to connect the ISP and thereby access the** 01:58:56
3 **internet, any access software and hardware** 01:58:59
4 **must be correctly installed at the computer** 01:59:02
5 **system. So, for example then, if it's -- you** 01:59:04
6 **know, say you get the dialer for ISP1, but** 01:59:11
7 **that dialer may not be compatible with ISP2** 01:59:17
8 **because maybe it's designed to only dial** 01:59:21
9 **ISP1's numbers, there would be incompatibility** 01:59:23
10 **with a different ISP.** 01:59:27
11 Q. I'm sorry, what's an ISP? 01:59:29
12 **A. It's just internet service** 01:59:30
13 **provider. That's enumerated in Paragraph 5,** 01:59:32
14 **and that's consistent with my understanding** 01:59:34
15 **of --** 01:59:35
16 Q. So the incompatibility is that ISP1 01:59:37
17 needs to be compatible with ISP2 in this 01:59:40
18 example or internet service provider you said? 01:59:43
19 **A. That's not what I was saying I** 01:59:46
20 **don't think.** 01:59:47
21 Q. Okay. 01:59:47
22 **A. You know, for example, if you've** 01:59:48
23 **got a dialer for ISP1, maybe that dials only** 01:59:49
24 **ISP1's numbers and that would not be** 01:59:52
25 **compatible with dialing ISP2. So that dialer** 01:59:55

1 **might be incompatible with a different ISP,** 01:59:59
2 **and the user may lack the technical knowledge** 02:00:02
3 **to figure out how to reconfigure the software,** 02:00:08
4 **if even possible, for compatibility with the** 02:00:08
5 **different ISP, for example.** 02:00:11
6 Q. All right. 02:00:12
7 So we're talking about 02:00:13
8 compatibility between, in your example or in 02:00:13
9 Krantz's example, ISP1 and the dialer for ISP2 02:00:16
10 in making sure that there is compatibility? 02:00:19
11 **A. Yeah, I think that that is one of** 02:00:24
12 **the things it talks about there, and then, you** 02:00:25
13 **know, it also talks --** 02:00:27
14 Q. Well, let's stop there. I don't 02:00:29
15 want to jump -- I want to just stay on the 02:00:30
16 ISPs for a minute and then we can get to the 02:00:31
17 other parts. 02:00:32
18 So with respect to the ISP1 and the 02:00:33
19 data for ISP2, how would that be related to 02:00:35
20 network security? 02:00:39
21 **A. Well, the first step in getting on** 02:00:50
22 **the network would be to dial into an ISP.** 02:00:53
23 Q. Uh-huh. 02:00:58
24 **A. And Krantz does talk about various** 02:00:58
25 **issues related that I've pointed out in my** 02:01:05

1 **declaration and so this is only a small part** 02:01:08
2 **of Krantz.** 02:01:10
3 Q. Well, it says right here, it says 02:01:13
4 in your declaration 141, you say: Krantz 02:01:16
5 identifies that one problem in a prior art 02:01:19
6 systems was that software incompatibilities 02:01:21
7 must be worked out; is that right? 02:01:24
8 **A. So that's just one example of** 02:01:47
9 **software, but Krantz is laying the foundation** 02:01:48
10 **for -- you know, what I'm saying here is that,** 02:01:52
11 **you know, Krantz says that one problem in** 02:02:06
12 **prior art systems is that software** 02:02:08
13 **incompatibilities must be worked out by a user** 02:02:11
14 **that may lack the technical expertise or** 02:02:14
15 **desire to reconfigure software for** 02:02:15
16 **compatibility with the service.** 02:02:16
17 Q. And that's in your report on 02:02:17
18 Page -- again, hold on. It's Page 85, 02:02:19
19 Paragraph 141? 02:02:22
20 **A. Well, it comes from Krantz. That's** 02:02:24
21 **a citation.** 02:02:26
22 Q. But it comes from Krantz and you're 02:02:27
23 citing to Paragraph 13 in Krantz? 02:02:28
24 **A. Yes.** 02:02:31
25 Q. Okay. So in Paragraph 141 of your 02:02:31

1 declaration, how are software 02:02:33
2 incompatibilities related to network security? 02:02:37
3 **A. Well, it's Krantz in view of the** 02:02:41
4 **disclosures in Herrmann, and Herrmann talks** 02:02:43
5 **about having the proper antivirus software** 02:02:45
6 **installed that are compatible with what the** 02:02:49
7 **security policies of a particular -- I forgot** 02:02:52
8 **what Herrmann uses.** 02:02:58
9 Q. I don't want to talk about Herrmann 02:02:59
10 right now, but my question is specifically 02:03:00
11 Krantz only. So how would Krantz -- Krantz's 02:03:02
12 disclosure of or fixing the problem in a prior 02:03:06
13 art that was, quote, software 02:03:10
14 incompatibilities, how would Krantz alone -- 02:03:11
15 software incapabilities in Krantz alone relate 02:03:13
16 to network security? 02:03:16
17 **A. I mean, I'm not relying on Krantz** 02:03:31
18 **alone for my analysis for Claim 2. I'm** 02:03:32
19 **relying on Krantz in view of the disclosures** 02:03:35
20 **in Herrmann, and Herrmann is the one that** 02:03:37
21 **discloses promptly updating antivirus** 02:03:39
22 **applications on all machines on the network.** 02:03:43
23 Q. I'm sorry, so you're not relying on 02:03:46
24 Krantz alone for your analysis of Claim 2; is 02:03:48
25 that correct? 02:03:54

1 **A. What I'm saying in this section is** 02:04:13
2 **it's Krantz in view of the disclosure of** 02:04:15
3 **Herrmann is what discloses the language in** 02:04:16
4 **Claim 2 for this additional element in Claim 2** 02:04:21
5 **in that I give motivations why a POSITA would** 02:04:27
6 **be motivated to modify the system of Krantz** 02:04:30
7 **later in the session starting around** 02:04:33
8 **Paragraph 146.** 02:04:35
9 Q. Yeah, I see that. We'll strike all 02:04:36
10 that because my question specifically, and 02:04:38
11 I'll read it back to you, is: You're not 02:04:40
12 relying on Krantz alone for your analysis of 02:04:42
13 Claim 2, and I think you've answered that. 02:04:44
14 Right? 02:04:48
15 **A. Well, yeah, I mean, it's Krantz in** 02:04:49
16 **view of the disclosure in Herrmann.** 02:04:54
17 Q. In view as set forth in your 02:04:55
18 declaration? 02:04:57
19 **A. As set forth in my declaration. I** 02:04:58
20 **mean, my declaration says what it says.** 02:04:59
21 Q. Can we turn to, since we're here, 02:05:03
22 Paragraph 144 of your declaration or, excuse 02:05:09
23 me, Paragraph 144. It's on the same page. 02:05:11
24 **A. Okay.** 02:05:14
25 Q. It says: Herrmann further 02:05:15

1 discloses that a network administrator may 02:05:16
2 require all users accessing the network to 02:05:18
3 implement a virus definition update, e.g., a 02:05:20
4 DAT file, that is targeted at a particular 02:05:25
5 virus. 02:05:27
6 Do you see that? 02:05:28
7 **A. Yes.** 02:05:28
8 Q. Can you tell me what a DAT file is? 02:05:29
9 CERTIFIED STENOGRAPHER: D-A-T? 02:05:57
10 ATTORNEY MICHALEK: D-A-T. 02:05:59
11 **A. Well, as used in this paragraph, in** 02:06:08
12 **Herrmann Paragraph 71, it's an example of a** 02:06:12
13 **file that contains a virus definition update** 02:06:17
14 **that is targeted to a particular virus, and so** 02:06:20
15 **that would be embodied in a file which it** 02:06:23
16 **calls a DAT file, which often may refer to the** 02:06:28
17 **extension, but it's a rather generic** 02:06:33
18 **extension.** 02:06:35
19 Q. Yeah. 02:06:35
20 Is a DAT file a term that you 02:06:37
21 understand is general in the art, is known in 02:06:39
22 the art? 02:06:42
23 **A. I mean, it's known that files have** 02:06:45
24 **extensions, and I wouldn't say DAT is a** 02:06:46
25 **particularly known form of a virus update. I** 02:06:53

1 **would say it's a generic file extension which** 02:06:56
2 **it's just using, as an example, to put a label** 02:06:59
3 **on the type of file, but it describes the file** 02:07:03
4 **as having -- as a file that would contain a** 02:07:06
5 **virus definition update that is targeted to** 02:07:18
6 **add a particular virus.** 02:07:20
7 **And I think that was common for** 02:07:24
8 **virus scanners to be able to be updated using** 02:07:29
9 **virus definitions instead of reprogramming the** 02:07:34
10 **whole -- re -- reinstalling the whole virus** 02:07:37
11 **file that you could simply, sorry, program as** 02:07:42
12 **opposed to installing the whole virus program** 02:07:45
13 **itself, that some methods of updating a virus** 02:07:48
14 **scanner would be to load and load new** 02:07:54
15 **definitions of viruses, and so that could** 02:08:00
16 **involve -- that would involve reconfiguring a** 02:08:02
17 **virus program, for example, to now be able to** 02:08:08
18 **recognize these new viruses.** 02:08:11
19 Q. So you say in Paragraph 141: A 02:08:14
20 network administrator may require all users 02:08:17
21 accessing the network to implement a virus 02:08:20
22 definition update, e.g., a DAT file. 02:08:22
23 My question is: How would a 02:08:25
24 network administrator do that? 02:08:26
25 **A. Herrmann, for example, describes** 02:09:52

1 **security and behavioral policy in** 02:09:56
2 **Paragraph 70, security and behavioral policy** 02:09:58
3 **definition and enforcement, for example, and** 02:10:03
4 **it goes on to say antivirus policies.** 02:10:08
5 Q. I'm sorry, I really don't see where 02:10:13
6 you're reading from, Doctor. 02:10:14
7 **A. Paragraph 70 in Herrmann.** 02:10:15
8 Q. Okay. And this is regarding a 02:10:17
9 network administrator? Can you show me where 02:10:18
10 that is? 02:10:22
11 **A. Well, this is what a network** 02:10:24
12 **administrator could do, is they could** 02:10:26
13 **implement this system as described here in** 02:10:29
14 **Herrmann where there is a security and** 02:10:30
15 **behavioral policy definition and ability to** 02:10:34
16 **enforce those, such as an antivirus policy,** 02:10:37
17 **and it talks about this as provided by the** 02:10:40
18 **TrueVector engine available from Zone Labs.** 02:10:45
19 Q. Yeah, what is that? 02:10:48
20 **A. Well, it's what's described in** 02:10:53
21 **further detail in this other patent** 02:10:56
22 **application. So you can look to see --** 02:10:58
23 Q. Well, you're testifying about it. 02:11:02
24 Did you know about TrueVector? 02:11:04
25 **A. I've read this before so.** 02:11:06

Q. Okay. What is TrueVector? 02:11:08

A. It's an engine provided -- it's an engine available from Zone Labs, Inc. That's what the specification says, and it's described in further detail in this other patent that's -- 02:11:10 02:11:14 02:11:16 02:11:18 02:11:20

Q. Do you know how it works? 02:11:24

ATTORNEY BORDER: Objection. Form. 02:11:28

A. Well, I think what it's describing is it -- it's further detailed in this other patent. So I think we can look at this other patent to say what this specification is teaching about. 02:11:29 02:11:31 02:11:33 02:11:36 02:11:39

Q. What is a network administrator or who is a network administrator? 02:11:40 02:11:42

A. Sometimes those refer to people who are -- have higher authority than users to set up the network and install specified things for the network. 02:11:46 02:11:48 02:11:59 02:12:09

Q. So walk me through Paragraph 144. So we've got a network administrator may require all users accessing the network to implement a virus definition update, e.g., a DAT file. 02:12:10 02:12:12 02:12:14 02:12:16 02:12:20

So how would a network 02:12:21

1 administrator do that? 02:12:23
2 **A. What paragraph are you referring** 02:12:26
3 **to?** 02:12:27
4 Q. We're still on Paragraph 144 of 02:12:28
5 your declaration. 02:12:30
6 **A. I mean, as used in Herrmann, it** 02:20:07
7 **describes the role of an administrator or** 02:20:12
8 **network administrator in several places,** 02:20:15
9 **including Paragraph 71.** 02:20:17
10 **So what it's describing about this** 02:20:19
11 **network administrator is that the rules** 02:20:21
12 **enforced by the policy server 460 may also be** 02:20:27
13 **changed from time to time by a user or** 02:20:32
14 **administrator, for example, in response to** 02:20:34
15 **certain events, such as a threat from a** 02:20:36
16 **serious virus that has been released.** 02:20:39
17 **So what it's saying here is that an** 02:20:43
18 **administrator and this network administrator** 02:20:45
19 **can update these -- the rules to be enforced** 02:20:49
20 **by the policy server from time to time, and** 02:20:54
21 **one example is that this network administrator** 02:20:55
22 **may require all users accessing the network** 02:20:59
23 **to -- I'm going to paraphrase a little --** 02:21:05
24 **basically update their virus definitions.** 02:21:05
25 Q. With the DAT file. 02:21:10

How would they do it then? Would 02:21:12
they manually type it into the system, the 02:21:13
update? 02:21:15
A. Well, I don't think they would 02:21:21
type -- 02:21:22
Q. Just in practice? 02:21:22
A. It doesn't say here. 02:21:23
Q. I'm not asking what it says, but 02:21:24
I'm just trying to understand how a network 02:21:26
administrator would change the rules from, 02:21:28
quote, time to time as from the section you 02:21:40
indicated? 02:21:44
A. I don't see in this section, that 02:24:53
I'm looking at around Paragraph 71 and 02:24:55
paragraphs around there, any specific way that 02:24:57
the -- Herrmann talks about for doing these -- 02:25:00
for updating the virus definition 02:25:03
specification or what's required, but 02:25:07
similarly in the '450 patent specification, I 02:25:09
was looking at what it said about how -- 02:25:12
Q. Well, I'm going to strike that. 02:25:14
I'm not asking about the '450. 02:25:16
A. -- how someone updates the security 02:25:18
policy 330, and it doesn't say in the '450 02:25:21
patent exactly how -- 02:25:23

Q. Well, we'll strike the -- 02:25:25
A. -- exactly how -- I'd like to 02:25:25
finish my answer. 02:25:25
- - - 02:25:25
(Unintelligible, simultaneous 02:25:25
testimony interrupted by the certified 02:25:25
stenographer.) 02:25:25
- - - 02:25:25
CERTIFIED STENOGRAPHER: I need one at 02:25:25
a time, please. 02:25:25
ATTORNEY MICHALEK: Scott, we'll let 02:25:38
him finish his answers when he's actually 02:25:38
answering. We're going to be here all day if 02:25:39
this keeps continuing. 02:25:41
ATTORNEY BORDER: You've got seven 02:25:42
hours, so we won't be here all day. 02:25:42
A. So the reason this is relevant, the 02:25:48
answer is, because in the '450 patent -- 02:25:51
BY ATTORNEY MICHALEK: 02:25:54
Q. I'm sorry, what question are you 02:25:54
answering? 02:25:55
A. I'm trying to answer the question 02:25:56
of how in Herrmann these virus definitions -- 02:25:57
Q. That's not my question. 02:26:03
A. So. 02:26:05

Q. Let me retry my question? 02:26:06

A. Let me finish what I understand the question to be. 02:26:08 02:26:09

Q. And what is the question? 02:26:10

A. And then you can reask your question. I'm just going to continue with my answer then, trying to answer, which is in the '450 patent, I looked for how security policies get updated, and I didn't find any disclosure of exactly how that happened, and similarly, you know, Herrmann talks about updating, that the user administrator may change the rules enforced by the policy server from time to time, and I think the level of disclosure about how an administrator changes the rules enforced by the policy server is similar in Herrmann to what I saw or didn't see in the '450 patent as to how security policies get updated. 02:26:12 02:26:12 02:26:14 02:26:16 02:26:19 02:26:23 02:26:26 02:26:31 02:26:42 02:26:45 02:26:48 02:26:51 02:26:54 02:26:58 02:27:01

Q. Okay. We'll strike that answer. 02:27:02

My question is: Do you know how a network administrator can -- I'll read the language in Herrmann. Do you know how a network administrator can update a virus or may require all users accessing a network to 02:27:05 02:27:06 02:27:11 02:27:13 02:27:18

implement a virus definition update? 02:27:20

A. So as I say in Paragraph 144, this may be implemented using security rules and checking system data for connecting devices to ascertain compliance, and then I cite to Paragraph 68 of Herrmann talking about how the policy server 460 reinforce, i.e., using the gatekeeper -- well, sorry, that's not in this actual cite. That's what I've added. 02:28:02 02:28:06 02:28:08 02:28:11 02:28:13 02:28:16 02:28:20 02:28:23

A variety of different types of security policies or rules. These security policies may include, for instance, rules which require client devices -- rules which require client devices connecting to a given network to be using particular security or antivirus program. 02:28:26 02:28:28 02:28:28 02:28:31 02:28:37 02:28:39 02:28:43

For example, a system administrator may establish the policy requiring that a specific virus protection program is operational on each client device that is connected to a network. 02:28:45 02:28:47 02:28:49 02:28:51 02:28:53

Q. Okay. Thank you. 02:28:55

A. So I think that is how administrator Herrmann discloses administrator could use the policy server 460 to enforce the 02:28:57 02:29:01 02:29:04

1 **different policies or rules.** 02:29:08
2 Q. Thank you. 02:29:09
3 And it's your testimony in 02:29:11
4 Paragraph 144 that a system administrator may 02:29:13
5 establish a policy. How would a system 02:29:16
6 administrator establish a policy? 02:29:19
7 **A. I think similar to the way the '484** 02:29:30
8 **patent, which I don't think I saw anything** 02:29:33
9 **with respect to establishing a security** 02:29:41
10 **policy, but similar to the person of ordinary** 02:29:42
11 **skill looking at the '484 -- sorry, '450** 02:29:45
12 **patent, not '484, I misspoke earlier, '450** 02:29:47
13 **patent is what I meant, would know how to** 02:29:51
14 **establish a security policy in the '450** 02:29:57
15 **patent, and that same level of knowledge could** 02:29:59
16 **be applied for that same person of ordinary** 02:30:02
17 **skill looking at Herrmann as to how to** 02:30:04
18 **establish the policies in Herrmann.** 02:30:06
19 Q. And how do you do it? 02:30:09
20 **A. You do it the same way a person** 02:30:11
21 **looking at the '450 patent would do it, which** 02:30:13
22 **I didn't see how they disclosed it, so it** 02:30:15
23 **would be the same level of knowledge of a** 02:30:18
24 **person of ordinary skill when looking at the** 02:30:20
25 **'450 patent as to how they would establish a** 02:30:23

1 **security policy. That same knowledge would be** 02:30:25
2 **used in Herrmann to establish the policy in** 02:30:28
3 **Herrmann.** 02:30:32
4 Q. So as you sit here today, you don't 02:30:32
5 know? 02:30:33
6 ATTORNEY BORDER: Objection. 02:30:35
7 Foundation. 02:30:35
8 **A. No, that's not what I said. What I** 02:30:37
9 **said was I don't see in the '450 patent how** 02:30:39
10 **the security --** 02:30:43
11 Q. I'm not talking about the '450. 02:30:44
12 I'm not -- 02:30:45
13 **A. Well, I am.** 02:30:46
14 Q. I'm talking about Herrmann. 02:30:47
15 **A. I'm talking about how security** 02:30:48
16 **policies are established in Herrmann and how a** 02:30:50
17 **person of ordinary skill would know how to do** 02:30:52
18 **that.** 02:30:54
19 **So what I'm saying is that the** 02:30:54
20 **person of ordinary skill looking at the '450** 02:30:55
21 **patent, which I didn't see any disclosure** 02:30:57
22 **about how a security policy 330 is established** 02:31:00
23 **in the '450 patent, if I'm wrong, you can** 02:31:04
24 **point me there.** 02:31:06
25 **We can look at it, but I spent some** 02:31:07

time looking for that just now and I didn't 02:31:11
see any disclosure in the '450 patent about 02:31:14
how a POSITA would -- or how a security policy 02:31:17
would be established, and so what I'm saying 02:31:20
is that the '450 patent doesn't disclose how a 02:31:23
security policy is established that I saw, and 02:31:32
so it's up to a person of ordinary skill to 02:31:35
understand how to do that, and that same 02:31:37
person of ordinary skill looking at Herrmann 02:31:40
would also use that same knowledge that they 02:31:42
had to have in the '450 patent to understand 02:31:45
how to establish the security policies of the 02:31:48
'450 patent to establish the security policies 02:31:50
in Herrmann. 02:31:54
Q. Are you a person of ordinary skill 02:31:55
in the art? 02:31:56
A. I was at least that level as I 02:31:57
outline somewhere in my declaration. 02:32:01
Q. So without looking at Herrmann or 02:32:02
Lum, do you know how to do it? 02:32:03
A. So a POSITA without -- well, the 02:32:06
problem is that it is in the context. 02:32:10
Q. I'm not asking that much. I'm 02:32:12
asking outside the context, just in general 02:32:14
cybersecurity in network analysis, do you know 02:32:16

how to do it as a person of ordinary skill in 02:32:19
the art? 02:32:20
ATTORNEY BORDER: Objection. Outside 02:32:21
the scope of his expert report. 02:32:21
A. That's not the context of my 02:32:23
declaration. 02:32:24
Q. Okay. Thank you. 02:32:24
- - - 02:32:24
(Unintelligible, simultaneous 02:32:24
testimony interrupted by the certified 02:32:24
stenographer.) 02:32:24
- - - 02:32:24
CERTIFIED STENOGRAPHER: I need one at 02:32:24
a time, please. 02:32:24
A. So if I could ask to be allowed to 02:32:37
complete my answer, so you can fight over 02:32:39
striking the stuff afterwards. I understand 02:32:40
that's what you can do afterwards, but if you 02:32:43
would allow me to complete my answer before 02:32:44
interrupting me, then we can have an accurate 02:32:47
record. 02:32:49
Q. Dr. Houh, can you turn to 02:32:52
Paragraph 182, please, of your report. 02:32:54
A. Okay. 02:32:59
Q. What's an agent? 02:33:02

1 **A. So a person of ordinary skill would** 02:33:48
2 **recognize that the policy agent is an example** 02:33:51
3 **of an agent as claimed in Claim 14.** 02:33:53
4 Q. In Paragraph 182 on Page 108, you 02:33:57
5 say: A POSITA would have understood that in 02:34:00
6 order to evaluate the device, certain 02:34:05
7 information regarding the device must be 02:34:07
8 scanned. 02:34:10
9 Do you see that? 02:34:10
10 **A. I do now. I think you read it** 02:34:20
11 **right.** 02:34:22
12 Q. Are there other ways to evaluate a 02:34:24
13 device other than scanning? 02:34:26
14 **A. I think I say a very similar thing** 02:38:40
15 **to that paragraph in that earlier section with** 02:38:42
16 **respect to element 1.2, which is where the** 02:38:45
17 **scanning is actually referring to, that is** 02:38:48
18 **performed by an agent, but if you look back at** 02:38:52
19 **that section, I talk about how scanning --** 02:38:54
20 **within Paragraph 97, scanning is used in its** 02:38:56
21 **typical sense to mean gathering/collecting** 02:39:00
22 **relevant information/data from the device and** 02:39:04
23 **how Krantz is disclosing gathering of relevant** 02:39:07
24 **information from the device, and I give an** 02:39:10
25 **example from Krantz, and that this whole** 02:39:12

section is supporting how Krantz is disclosing 02:39:19
scanning the device to collect information 02:39:26
regarding the device, and that it's the policy 02:39:28
agent of Herrmann in a combination that a 02:39:34
POSITA would have motivated combined Krantz 02:39:38
and Herrmann for reasons I give elsewhere, 02:39:40
that discloses how it's an agent as required 02:39:42
by Claim 14, that an agent on a device that is 02:39:49
performing the scanning. 02:39:57
Q. So is scanning the only way to get 02:40:01
certain information or are there others? 02:40:03
A. Well, what I've said is that 02:40:07
scanning is used in its typical sense to mean 02:40:08
gathering, collecting relevant information and 02:40:13
data from the device. 02:40:15
Q. Is that a claim construction? 02:40:16
A. I think that's how a person of 02:40:20
ordinary skill understands what scanning 02:40:23
includes, which is I didn't see any -- 02:40:26
anything in the '450 patent to describe 02:40:33
scanning in a nonordinary sense. 02:40:37
Q. Would it be fair to say that that's 02:40:41
a plain and ordinary -- your view of scanning, 02:40:42
that is your plain and ordinary view of the 02:40:46
meaning of what scanning is? 02:40:48

1 **A. I think it would include what I've** 02:40:49
2 **said here, which is scanning is used in its** 02:40:50
3 **typical sense to mean gathering/collecting** 02:40:53
4 **relevant information/data from the device.** 02:40:56
5 Q. As a POSITA, are you familiar with 02:41:01
6 the term "agent list"? 02:41:02
7 **A. I don't recall that being used in** 02:41:23
8 **the '450 or Herrmann or Krantz. If you could** 02:41:24
9 **show me where it's used, I can take a look,** 02:41:31
10 **but that term doesn't ring a bell in the** 02:41:33
11 **context of my declaration.** 02:41:38
12 Q. Does it ring a bell in the context 02:41:39
13 outside your declaration as a POSITA? 02:41:40
14 ATTORNEY BORDER: Objection. Outside 02:41:44
15 the scope. 02:41:45
16 **A. I haven't considered that outside** 02:41:45
17 **my declaration.** 02:41:49
18 Q. Still on Paragraph 182, you say: 02:41:50
19 The policy server is notified by the client 02:41:59
20 containing policy agent 413 through periodic 02:42:02
21 status messages called IA HEARTBEATS in order 02:42:06
22 to authenticate the access device. 02:42:10
23 Do you see that? 02:42:13
24 **A. Well, I wasn't looking there when** 02:42:18
25 **you started, but the end of what you read, I** 02:42:20

1 **see that.** 02:42:23
2 Q. What's a HEARTBEAT? 02:42:24
3 **A. If you look at Paragraph 80 of** 02:43:41
4 **Herrmann, it talks about the HEARTBEAT message** 02:43:41
5 **and it says --** 02:43:44
6 **- - -** 02:43:44
7 **(Clarification requested by the** 02:43:44
8 **stenographer.)** 02:43:44
9 **- - -** 02:43:44
10 **A. Or more specifically the IA,** 02:43:44
11 **underscore, HEARTBEAT message, which is a** 02:43:46
12 **periodic status message sent from the client** 02:43:50
13 **directly to the policy server, and in** 02:43:53
14 **Paragraph 98, it talks about how there may be** 02:43:57
15 **the requirement of reauthentication at an** 02:44:02
16 **appropriate time interval, for example, via a** 02:44:05
17 **HEARTBEAT message from the client device** 02:44:08
18 **directly to the policy server as previously** 02:44:10
19 **described, which I believe is referring to** 02:44:12
20 **what's previously described using the IA** 02:44:14
21 **HEARTBEAT message, which is a periodic status** 02:44:16
22 **message as Herrmann discloses.** 02:44:21
23 Q. And does the HEARTBEAT have a data 02:44:24
24 packet associated with it? 02:44:28
25 **A. I mean, it's described as a** 02:45:15

periodic status message. So status 02:45:16
information certainly is data. 02:45:20
Q. And what type of information would 02:45:39
be contained in a HEARTBEAT data packet? 02:45:40
A. Well, if you look at Paragraph 80, 02:46:16
the kind of data is status data, but if you 02:46:18
look at Paragraph 98, it talks about 02:46:24
reauthenticating at an appropriate time 02:46:30
interval via a HEARTBEAT message. So I think 02:46:34
a person reviewing this would understand that 02:46:37
a HEARTBEAT message also includes information 02:46:38
sufficient to reauthenticating an appropriate 02:46:43
time interval. 02:46:47
Q. Would it include policy 02:46:49
information? 02:46:50
A. So the '450 patent talks about how 02:49:26
security -- I'm looking at Column 6, Line -- 02:49:28
starting Line 44 near the end. The security 02:49:31
policies may include requirements for user 02:49:35
identification, such as user names and 02:49:37
passwords, configuration requirements relating 02:49:39
to the configuration of access device 230. It 02:49:42
goes on. But it certainly discloses that 02:49:45
security policies include requirements for 02:49:48
user identification, such as user names and 02:49:51

1 **passwords.** 02:49:54
2 **I think if you look at what's** 02:49:55
3 **disclosed in Herrmann about the IA HEARTBEAT** 02:49:57
4 **and how it can be used to reauthenticate, I** 02:50:00
5 **believe Herrmann may give -- that's the kind** 02:50:04
6 **of information used to reauthenticate. So** 02:50:10
7 **certainly I think the IA HEARTBEAT relates to** 02:50:13
8 **security policies as they're described in the** 02:50:18
9 **'450 patent itself.** 02:50:21
10 Q. Okay. Is there anywhere in 02:50:25
11 Herrmann that you can point to that shows 02:50:26
12 policy information in a HEARTBEAT? 02:50:29
13 **A. Yeah, Herrmann talks about using** 02:51:40
14 **the EAP protocol. For example, in Paragraph 9** 02:51:43
15 **of Herrmann, it talks about how EAP is a** 02:51:48
16 **general protocol for authentication, which** 02:51:53
17 **supports multiple authentication mechanisms.** 02:51:56
18 **These authentication methods** 02:51:59
19 **include not only username and password, but** 02:52:00
20 **also a number of other types of** 02:52:03
21 **authentication, but it's certainly disclosed** 02:52:04
22 **in here that username and password is -- it** 02:52:07
23 **can be used for authentication, and then if** 02:52:11
24 **you look at Paragraph 98 of Herrmann, it's** 02:52:13
25 **saying that that HEARTBEAT message is used for** 02:52:17

reauthenticating at an appropriate time 02:52:26
interval. 02:52:29
So taken together, I think that's 02:52:29
how Herrmann does disclose, for example, the 02:52:32
use of username/password for authentication 02:52:34
being transmitted in order to reauthenticate 02:52:37
at various time intervals, which is disclosing 02:52:42
what the '450 patent specifically includes as 02:52:45
information related to its security policies. 02:52:48
Q. Okay. So your view is that 02:52:50
Herrmann through username and 02:52:52
password -- strike that. 02:52:53
Let me just make sure I understand. 02:52:56
So your view is that the HEARTBEAT 02:52:59
message in Herrmann contains information 02:53:00
relating to a username and password? 02:53:03
A. My position is that Paragraph 98 is 02:53:08
disclosing how this HEARTBEAT message is used 02:53:10
to reauthenticate at the appropriate time 02:53:14
interval and that authentication, as also 02:53:18
described in Herrmann, one way to authenticate 02:53:21
is through the use of a username and password, 02:53:23
and so if you're -- so certainly the HEARTBEAT 02:53:26
message being used for reauthentication would 02:53:31
be containing the information used to 02:53:36

1 **authenticate again, which one example given in** 02:53:39
2 **Herrmann is the use of a username and** 02:53:42
3 **password.** 02:53:44
4 Q. So it includes a username and 02:53:44
5 password? 02:53:46
6 **A. That's part of what it's disclosing** 02:53:48
7 **by saying that there is reauthentication using** 02:53:51
8 **a HEARTBEAT message, which is described in** 02:53:54
9 **Paragraph 98 and further described in** 02:53:57
10 **Paragraph 80, I think, of Herrmann.** 02:54:01
11 Q. And I think you testified before, 02:54:03
12 HEARTBEAT message is a -- quote, a status 02:54:04
13 message? 02:54:08
14 **A. It says that it includes status** 02:54:09
15 **information I think somewhere. Was that in** 02:54:11
16 **80? Let me look. It's a periodic status** 02:54:13
17 **message, but also Paragraph 98 talks about how** 02:54:21
18 **that same message is used for reauthentication** 02:54:24
19 **at an appropriate time interval and that** 02:54:28
20 **authentication methods of doing various** 02:54:31
21 **examples include the use of a username and** 02:54:37
22 **password.** 02:54:39
23 **So reauthentication would be just** 02:54:41
24 **doing it again, using one example username and** 02:54:44
25 **password.** 02:54:46

Q. Can you turn to Figure 4 of Herrmann? 02:54:48 02:54:50

A. Okay. 02:54:57

Q. Do you see the dotted line on the left that says "not used until after authentication"? I see you thumbing through, so you're anticipating my question, which is: Do you know what that dotted line is for? 02:54:57 02:54:58 02:55:01 02:55:19 02:55:21

A. I mean, I do see "not used until after authentication" on the dotted line in Figure 4, and I'm trying to find the description in the specification to answer your second question there. I'm trying to find it, but you happen to know where it is -- 02:56:54 02:56:56 02:56:58 02:57:01 02:57:05 02:57:08

Q. Let me try because I don't want you fishing. 02:57:11 02:57:13

So let's go to Paragraph 80 again where it says: Which is a periodic status message sent from the client directly to the policy server, and my question is: Is it possible that the dotted line in Figure 4 is referring to that HEARTBEAT message and its path? 02:57:14 02:57:19 02:57:23 02:57:25 02:57:27 02:57:31 02:57:35

A. Well, I see that Paragraph 80 is in a section where there is a heading at 02:59:30 02:59:32

1 **Paragraph 72 saying: Operations of Proxy** 02:59:34
2 **Server and IGW Server, and that immediately** 02:59:37
3 **starts discussing Figure 5, but the Figure 4** 02:59:45
4 **description starts with the heading: System** 02:59:51
5 **Components in Paragraph 61 and goes through,** 02:59:54
6 **appears, Paragraph 71. So I don't see how** 02:59:56
7 **these are related in the way that you're** 03:00:07
8 **asking.** 03:00:11
9 Q. So do you know then what the "not 03:00:11
10 used until after authentication path" is? 03:00:14
11 **A. If you look at that Paragraph 67,** 03:05:02
12 **one thing in Paragraph 67 that appears to** 03:05:03
13 **describe is, if you look in the middle, just** 03:05:05
14 **above the middle in a sentence starting "in** 03:05:10
15 **response to a message," it says: In response** 03:05:12
16 **to a message from the IGW server '450 or a** 03:05:15
17 **subsequent message from the policy agent 413** 03:05:22
18 **on the client device 310, the policy server** 03:05:24
19 **460 evaluates whether or not the client device** 03:05:27
20 **310 has a correct up-to-date version of the** 03:05:31
21 **applicable security policy.** 03:05:34
22 **So it's not -- there is no label on** 03:05:37
23 **that, but that is a communication from the** 03:05:39
24 **agent on the 413 to 460, which appears to** 03:05:43
25 **happen after the authentication because the** 03:05:52

1 **authentication is described in earlier** 03:05:54
2 **paragraphs above.** 03:05:57
3 ATTORNEY BORDER: Can we take a break 03:06:06
4 soon? 03:06:07
5 ATTORNEY MICHALEK: Yeah, I'm fine. Do 03:06:10
6 you want to take -- 03:06:11
7 THE WITNESS: I wouldn't mind taking 03:06:15
8 one about now. 03:06:15
9 ATTORNEY MICHALEK: Let's take a break 03:06:17
10 then. All you have to do is ask. 03:06:18
11 Let's go off the record. 03:06:21
12 CERTIFIED STENOGRAPHER: Off the 03:06:22
13 stenographic record at 3:06 p.m. 03:06:22
14 - - - 03:06:23
15 (Whereupon, a short recess was 03:06:23
16 taken.) 03:06:23
17 - - - 03:06:25
18 CERTIFIED STENOGRAPHER: Back on the 03:15:00
19 stenographic record at 3:15 p.m. 03:15:00
20 BY ATTORNEY MICHALEK: 03:15:15
21 Q. Dr. Houh, good afternoon. How was 03:15:19
22 your break? 03:15:20
23 **A. It was great. Thank you.** 03:15:21
24 Q. Perfect. Are you ready to proceed? 03:15:22
25 **A. Yes.** 03:15:24

Q. All right. 03:15:25
Can you turn to Paragraph 66 of 03:15:25
your declaration, please. 03:15:27
A. Okay. 03:15:37
Q. So before we do that, let's 03:16:12
actually going to Paragraph 106. I apologize 03:16:21
for that. 03:16:23
A. Okay. 03:16:31
Q. Okay. 106, towards the bottom, 03:16:35
your testimony is that, quote: In addition to 03:16:37
the modification to the teachings of Krantz -- 03:16:41
to the teachings of Krantz can be implemented 03:16:43
as a simple software modification to include 03:16:47
policy agent. 03:16:50
Can you explain what you're 03:16:52
referring to there? 03:16:53
A. So Herrmann is describing the 03:17:02
policy agent as a client side component that 03:17:03
can communicate with an EAP ZLX extension DLL, 03:17:06
which is an implementation of the EAP protocol 03:17:17
that is utilized to provide support for 03:17:20
security policy negotiation and enforcement, 03:17:28
and I point out that this is the same protocol 03:17:30
utilized in Krantz, which is the EAP protocol, 03:17:36
and I'm also pointing out that these client 03:17:40

1 **side components, as Herrmann describes the** 03:17:48
2 **policy agent, can be implemented as a simple** 03:17:51
3 **software modification to the teachings of** 03:17:55
4 **Krantz.** 03:17:59
5 Q. So what would that modification be? 03:17:59
6 **A. If you look at the section, I talk** 03:19:14
7 **about the combination of Krantz and Herrmann** 03:19:14
8 **starting at Paragraph 51.** 03:19:18
9 Q. Are you referring to your 03:19:20
10 declaration, sir? 03:19:21
11 **A. Yes, in my declaration. I'm** 03:19:21
12 **talking about how it would have been obvious** 03:19:30
13 **to include Herrmann's techniques for enforcing** 03:19:32
14 **security policies, obtaining system data from** 03:19:36
15 **an access device in the system of Krantz, and** 03:19:41
16 **that if you look at Paragraph 52, a POSITA** 03:19:45
17 **would recognize that checking for antivirus** 03:19:49
18 **software would merely be an additional item** 03:19:51
19 **for authentication module 217 of server 215 to** 03:19:53
20 **check in the authentication process already** 03:20:04
21 **disclosed by Krantz, but that it's the** 03:20:07
22 **teachings of Krantz would presumably be** 03:20:19
23 **motivated to modify the teachings, and this is** 03:20:21
24 **Paragraph 53, to include determining whether** 03:20:24
25 **the requirements of a security policy that** 03:20:26

1 include checking for virus protection are 03:20:28
2 satisfied as taught by Herrmann. 03:20:32
3 Herrmann is talking about how it's 03:20:37
4 particularly important that devices connected 03:20:39
5 to the network are running current antivirus 03:20:42
6 programs and that one way of ensuring this is 03:20:45
7 implementing a policy requiring that a 03:20:49
8 specific virus protection program, and that 03:20:51
9 it's the agent and Herrmann which could be the 03:21:04
10 module, as I discuss, that the teaching of 03:21:08
11 Krantz can be implemented -- some of them 03:21:16
12 could be implemented as a simple software 03:21:20
13 modification to include a policy -- 03:21:25
14 - - - 03:21:25
15 (Clarification requested by the 03:21:25
16 stenographer.) 03:21:25
17 - - - 03:21:25
18 A. -- to the teachings of Krantz can 03:21:26
19 be implemented as a simple software 03:21:28
20 modification to include a policy agent, and 03:21:30
21 that would be the policy agent as a client 03:21:33
22 side component, which I think we talked 03:21:36
23 earlier about how Herrmann can -- 03:21:39
24 Q. I think my question is a little bit 03:21:48
25 different, and thank you for that. 03:21:49

1 So simple software modification in 03:21:51
2 Paragraph 106, are you saying you're modifying 03:21:53
3 the software of Krantz or the software of 03:21:56
4 Herrmann or both? 03:21:58
5 **A. It's the modification to the** 03:22:08
6 **teachings of Krantz that can be implemented as** 03:22:10
7 **a simple software modification to include a** 03:22:14
8 **policy agent as -- as -- as Herrmann** 03:22:16
9 **describes, so --** 03:22:20
10 Q. So we're modifying Krantz's 03:22:20
11 software to include the policy agent of 03:22:22
12 Herrmann? 03:22:24
13 **A. That's what I'm saying here.** 03:22:25
14 Q. What specifically in Krantz would 03:22:31
15 you need to modify to include the policy agent 03:22:33
16 of Herrmann? 03:22:35
17 **A. So there is client side software** 03:23:51
18 **disclosed in Krantz that implements the EAP** 03:23:53
19 **protocol.** 03:23:56
20 Q. Where is that? I'm sorry? 03:23:56
21 **A. That's Paragraph 18 of Krantz.** 03:23:58
22 Q. Okay. Thank you. 03:24:03
23 **A. And it talks about how** 03:24:04
24 **credentials -- sending credentials can include** 03:24:05
25 **sending an extension -- sorry, EAP response** 03:24:09

identity message, if the client is attempting 03:24:14
to connect to a network via an access point, 03:24:17
response identity message may be encapsulated 03:24:20
within some other type of message that can be 03:24:24
transferred through the access point. 03:24:27
Q. So -- 03:24:31
A. And so there is software on the 03:24:31
client in Krantz that now can be simply 03:24:33
modified to include a policy agent. 03:24:37
Q. Let's start there. 03:24:39
So your testimony is that there is 03:24:40
client side software disclosed in Krantz that 03:24:46
implements the EAP protocol. So that's what 03:24:48
we would need to modify to include the 03:24:51
Herrmann policy agent? 03:24:53
A. Well, generally, the software on 03:24:56
the client to include the policy agent, but 03:24:57
it's clear that there is software on the 03:25:04
client. 03:25:05
Q. So where is the client in Krantz so 03:25:05
I can follow along here? 03:25:07
A. The client is in Figure -- Figure 2 03:25:08
of Krantz. The client is 205. I think I've 03:25:14
mapped out to the access device of the claims. 03:25:19
Q. So what would we be modifying on 03:25:21

1 the client 205 in Krantz as our simple 03:25:24
2 software modification? 03:25:29
3 **A. Generally, Krantz is talking about** 03:27:53
4 **how there is these modules on client device** 03:27:59
5 **205, such as user interface module 206. So** 03:28:04
6 **it's clear that Krantz is talking about these** 03:28:08
7 **things as software modules.** 03:28:11
8 **A person of ordinary skill would** 03:28:15
9 **understand that there was software on 205, and** 03:28:17
10 **so it's simply adding a policy agent's** 03:28:24
11 **software of which would be a simple software** 03:28:30
12 **modification to add a policy agent to the** 03:28:35
13 **software of client 205 in print.** 03:28:36
14 Q. So I see client 205 there is a 03:28:39
15 couple of modules. Would you modify user 03:28:41
16 interface module 206? Is that one of the 03:28:44
17 simple software modifications? 03:28:47
18 **A. It's simply a software** 03:28:49
19 **modification. You can modify whatever makes** 03:28:51
20 **sense to modify. I don't think it's** 03:28:53
21 **specifically in my declaration, but it's a** 03:28:56
22 **simple software modification to include a** 03:28:58
23 **policy agent in Krantz on, for example, client** 03:29:00
24 **device 205.** 03:29:06
25 Q. So you wouldn't necessarily need to 03:29:08

modify the other modules or user interface 03:29:12
module 206, for example, to accomplish what 03:29:17
you're saying here as a simple software 03:29:21
modification? 03:29:24
A. It's a simple software modification 03:29:25
well within the skill of a POSITA at the time. 03:29:27
That's what I'm saying in -- well, I don't 03:29:31
quite say exactly that in 106, but that's part 03:29:34
of the point. 03:29:37
Q. Would a policy agent work with a 03:29:39
RADIUS server? 03:29:41
A. I think a person of ordinary skill 03:29:47
would understand how to make the policy agent 03:29:49
work on the client to collect the data as 03:29:51
Herrmann discloses the policy agents to as a 03:29:56
client side component. 03:30:00
Q. But it would not -- as it stood, 03:30:04
their policy agent would not work with the 03:30:06
RADIUS server? 03:30:08
ATTORNEY BORDER: Objection. 03:30:09
Foundation. 03:30:09
A. That's not what I said. 03:30:10
Q. Okay. 03:30:12
A. It would be a simple modification 03:30:14
to Krantz within the skill of a POSITA to make 03:30:16

the system work and modify Krantz with 03:30:19
teachings of Herrmann with respect to a policy 03:30:22
agent. They could make it work in the 03:30:24
embodiments of Krantz. There is no specific 03:30:26
issue with respect to a RADIUS server that I 03:30:31
would identify, and to the extent patent owner 03:30:35
comes back and says, There is a problem with 03:30:41
that, maybe I'll have the opportunity to 03:30:42
respond, but I don't see what the issue would 03:30:45
be. 03:30:47
Q. I'm sorry, I didn't understand that 03:30:47
testimony. Let me ask again: Would a policy 03:30:50
agent of Herrmann work with a RADIUS server? 03:30:52
A. The policy agent of Herrmann could 03:30:56
be made to work in various embodiments of 03:30:59
Krantz as a simple software modification. 03:31:02
Q. Okay. How could it be made to work 03:31:04
with a simple software modification? What are 03:31:07
they? 03:31:09
A. It would be creating a policy agent 03:31:10
that worked within the -- that according to 03:31:12
the teachings of Herrmann that worked within 03:31:15
the framework of Krantz. That's a simple 03:31:17
software modification. I'm not sure what 03:31:21
RADIUS or any other protocol necessarily has 03:31:22

to do with it as something that I do not see 03:31:25
would complicate anything. 03:31:29
Q. What modifications would you make 03:31:30
to Krantz to make a policy agent work with a 03:31:33
RADIUS server? 03:31:36
A. You could create a software module 03:31:38
that would be a modification to the overall 03:31:40
software to implement the teachings of 03:31:42
Herrmann, Herrmann's policy agent. 03:31:45
Q. And what would that software module 03:31:47
look like? 03:31:50
A. It would look like what Herrmann 03:31:51
teaches with respect to what the -- its policy 03:31:52
agent does. 03:31:56
Q. And specifically -- strike that. 03:32:06
What does Herrmann teach with 03:32:09
respect to what its policy agent does that 03:32:10
would need to be modified on Krantz? 03:32:13
A. To the extent Krantz already 03:32:34
doesn't disclose or render obvious this, 03:32:37
Herrmann is additionally comparing and -- 03:32:40
and -- the policy agent of Herrmann, for 03:32:49
example, as disclosed in Paragraph 64, if you 03:33:19
look in the middle there, the policy agent 413 03:33:24
to retrieve information about the current 03:33:29

security policy in operation on the client 03:33:31
device 310. 03:33:35
The information collected by the 03:33:35
policy agent 413 is then packaged by the EAP 03:33:36
client 311, together with material from the 03:33:40
other EAP dynamic link libraries, and sent to 03:33:43
the NAS 320 for handling by the server-side 03:33:50
components of the present invention. And so 03:33:58
that's some of what Herrmann is teaching about 03:34:03
what the policy agent does on the client. 03:34:06
Q. And Herrmann teaches a proxy 03:34:10
server, an IGW server, and a policy Integrity 03:34:11
server too; is that right? 03:34:18
A. In one of the example embodiments, 03:34:24
there is an IGW server. There is a proxy 03:34:25
server in Figure 4. There is a RADIUS server. 03:34:30
There is a network access server. There are a 03:34:33
number of servers that are listed in the 03:34:36
example embodiment I've given in Figure 4. 03:34:39
Q. Would one of the simple 03:34:43
modifications in your testimony be to also 03:34:45
include the server-side components you 03:34:46
identified as the proxy server, IGW server, 03:34:49
and/or policy server of Herrmann with grants? 03:34:53
ATTORNEY BORDER: Objection. Form. 03:34:55

1 **A. I'm not addressing that in** 03:34:58
2 **Paragraph 106 of my declaration. I'm** 03:34:59
3 **addressing the policy agent, which is on the** 03:35:02
4 **client side. I mean, if you think I'm talking** 03:35:09
5 **about that elsewhere, I'd be happy to take a** 03:35:12
6 **look at it, and it's also in my declaration.** 03:35:15
7 Q. Well, my question is: Would you 03:35:18
8 need these server-side components, as well as 03:35:21
9 part of these simple software modification 03:35:23
10 that's in the paragraph we're talking in your 03:35:26
11 declaration about, the simple software 03:35:30
12 modification to include a policy agent? 03:35:31
13 **A. I'm not addressing that directly in** 03:35:36
14 **Paragraph 106. If I address it elsewhere, we** 03:35:38
15 **can take a look at it in my declaration.** 03:35:43
16 Q. Regarding the simple software 03:35:54
17 modification, do you know how much it would 03:35:55
18 cost to do so? 03:35:59
19 **A. It's well within the skill of a** 03:36:01
20 **POSITA. They're able to implement the agent** 03:36:03
21 **in Herrmann, the same level of skill I** 03:36:06
22 **believe -- I don't believe it's -- it's the** 03:36:09
23 **POSITA looking at Herrmann, which is the** 03:36:12
24 **POSITA that I played out. I think it would be** 03:36:14
25 **straightforward to implement the agent,** 03:36:16

especially if one has already implemented the 03:36:19
agent in Herrmann. 03:36:22
Q. Do you know how much? Can you give 03:36:25
a numerical estimate? 03:36:27
A. I don't address that exact question 03:36:28
in my declaration I don't think. 03:36:30
Q. Do you think that it's, you know, 03:36:32
for a single device more a thousand dollars? 03:36:33
A. I don't have any opinion about the 03:36:37
number of hours. It's simply a 03:36:38
straightforward software modification to 03:36:40
include a policy agent in the teachings of 03:36:43
Krantz. 03:36:46
Q. Okay. Well, you said "number of 03:36:47
hours". Mine was actually cost, which was a 03:36:48
little bit different. 03:36:51
Do you have any opinion about an 03:36:52
estimate for how much it would cost to make 03:36:53
that simple software modification in your 03:36:53
declaration? 03:36:55
A. Whatever it is, these are well 03:36:57
within the skill of a POSITA. 03:36:59
Q. Do you know? 03:37:01
A. I don't have an opinion about exact 03:37:03
costs in my declaration. 03:37:04

Q. Are there any standard or 03:37:07
specifications you would look to in order to 03:37:08
perform the simple software modification in 03:37:10
your declaration? 03:37:14
A. I think a POSITA, they understand 03:37:16
how to write software, and to the extent they 03:37:19
need to refer to documentation, such as 03:37:21
software interfaces or protocol definitions, 03:37:25
they would have access to that, especially in 03:37:28
the light of how Krantz has already disclosed 03:37:30
the use of the EAP protocol that carries some 03:37:33
of this information back to the server. 03:37:36
Q. We talked about various 03:37:39
specifications for EAP protocol. 03:37:40
In implementing these simple 03:37:43
software modifications, would a person of 03:37:45
ordinary skill in the art look to any EAP 03:37:49
specifications? 03:37:51
A. Well Krantz I believe already 03:37:56
discloses using EAP in a way to carry 03:37:58
information. So assuming they've already done 03:38:01
that, they -- a person of ordinary skill would 03:38:04
know how to perform the modifications required 03:38:07
to incorporate the policy agent without having 03:38:11
to do any undue experimentation, they'd be 03:38:15

able to do it very simply. It's just a matter 03:38:18
of programming that's well within the level of 03:38:21
a person of ordinary skill. 03:38:24
Q. So they wouldn't necessarily need 03:38:26
to look at the specification? 03:38:27
A. They would look at what they need 03:38:28
to look at, if they needed to. 03:38:28
Q. And would that include the 03:38:31
specification as a person of ordinary skill in 03:38:32
the art? 03:38:33
A. Krantz already discloses a 03:38:37
limitation of using the EAP protocol, and so 03:38:40
if they've already done that and have 03:38:47
knowledge of it, they may not need to do it, 03:38:50
but if they do need to look at a specific part 03:38:52
of it, they could do so. 03:38:55
Q. Would you need to do it as a person 03:38:56
of ordinary skill in the art? 03:38:58
A. I think persons of ordinary skill 03:38:59
in the art generally know how to refer to 03:39:00
documentation that's readily available when 03:39:02
they need to do so. 03:39:04
Q. And yourself? 03:39:05
A. If I needed to refer to it, I would 03:39:06
refer to it. 03:39:08

Q. Do you know, as you sit here right 03:39:09
now, whether or not you would need to refer to 03:39:10
it? 03:39:13
A. It depends what software I have in 03:39:13
front of me that I'm starting from. If it's 03:39:15
embodied in a software and it's properly 03:39:18
documented, I may not need to refer to 03:39:21
something external, but if I need to, I would. 03:39:23
Q. Let's turn to Paragraph 114 of your 03:39:40
declaration. Actually, yeah, we can turn to 03:39:43
it, but I have one more question. 03:39:50
A. Okay. 03:39:51
Q. Do you know what a supplicant is? 03:39:54
A. I've heard that term before. I 03:40:01
would have to figure out what the context is. 03:40:06
Q. Where have you heard it? 03:40:09
A. I may have heard it with respect to 03:40:12
software programming, and I may have referred 03:40:14
to it with respect to science fiction. 03:40:18
Q. Let's take a look then at your 03:40:23
Exhibit 1416. 03:40:26
Sorry, I'm going to strike that for 03:40:49
a minute, Dr. Houh. 03:40:50
- - - 03:40:51
(Whereupon, document previously 03:40:51

marked Exhibit 1417, is received and marked as Exhibit 1417 for Identification.)

- - -

BY ATTORNEY MICHALEK:

Q. Before we do that, let's take a look at your Exhibit 1417. 03:40:52 03:40:53

Please take a look through that document, thumb through it and confirm for me that that represents the exhibit that you submitted in support of your declaration. 03:41:03 03:41:04 03:41:08 03:41:10

A. I mean, I don't know exactly where I cite to this, but I do recognize this document. 03:41:54 03:41:55 03:41:58

Q. Okay. And you agree it's your exhibit; right? 03:41:59 03:42:00

A. Yeah. I don't -- if you want to point me to where I cite to it in my declaration, that would give me some context, but I do recall this document. I probably cited to it somewhere, but I'm not totally sure because I don't have my report memorized. 03:42:02 03:42:04 03:42:06 03:42:08 03:42:10 03:42:12

Q. Page 1 of the Exhibit 417, towards maybe the bottom third quarter, it says: An EAP client supplicant contacts an authenticator. 03:42:18 03:42:22 03:42:26 03:42:30

1 Does that refresh your memory as to 03:42:31
2 what a supplicant is? 03:42:33
3 **A. I mean, it's saying -- using that** 03:42:40
4 **in reference to an EAP client in this context** 03:42:43
5 **here.** 03:42:47
6 Q. Right. Okay. I'll ask my question 03:42:47
7 again then. 03:42:49
8 Do you know what a supplicant is? 03:42:50
9 **A. I have heard that term referred --** 03:42:52
10 **used before and, in fact, it's used in this** 03:42:54
11 **document as well.** 03:42:56
12 Q. Okay. And what is a supplicant? 03:42:57
13 **A. In this document, it's referring to** 03:43:00
14 **an EAP client has a supplicant.** 03:43:01
15 Q. Okay. Do you have any reason to 03:43:06
16 believe it might mean something else? 03:43:07
17 **A. I believe it may be being used here** 03:43:18
18 **as a class of things that an EAP client may be** 03:43:20
19 **one of as opposed to definitionally being an** 03:43:24
20 **EAP client.** 03:43:26
21 Q. And in your Exhibit 417, would you 03:43:28
22 agree that the EAP client supplicants contacts 03:43:31
23 an authenticator and then the authenticator 03:43:34
24 receives this information and passes it to an 03:43:39
25 authentication server, usually a RADIUS 03:43:41

1 server? 03:43:43
2 **A. Do I say that somewhere in my** 03:43:48
3 **declaration?** 03:43:50
4 Q. I'm looking at the exhibit you 03:43:50
5 submitted to us and I'm asking questions about 03:43:52
6 Exhibit 417. 03:43:55
7 **A. Sure. Do you want to point me** 03:43:57
8 **anywhere? Do you want me to look through my** 03:43:59
9 **declaration and find the context in which I** 03:44:02
10 **referred to this?** 03:44:04
11 Q. Yeah. I would like to point you to 03:44:05
12 Exhibit 417 starting with "an EAP client 03:44:06
13 supplicant contacts an authenticator, a 03:44:09
14 wireless access point or a VCAN server, for 03:44:13
15 example," and I'd like you to read that 03:44:14
16 paragraph, and then my question is -- well, 03:44:17
17 let me know when you're done. 03:44:24
18 **A. Well, I've read it.** 03:44:53
19 Q. Okay. Can you tell me whether a 03:44:54
20 supplicant -- strike that. 03:44:58
21 Let's go back. After reading this 03:44:58
22 paragraph, does that refresh your memory as to 03:45:03
23 what a supplicant is any more than before? 03:45:05
24 **A. Maybe not more than before, but I** 03:45:14
25 **don't remember every definition I've ever** 03:45:15

read. 03:45:18
Q. Of course. 03:45:19
Can you explain a supplicant's 03:45:20
relationship to a RADIUS server? 03:45:21
ATTORNEY BORDER: Objection. Outside 03:45:26
the scope. 03:45:27
Q. Dr. Houh, you've now thumbed 03:54:36
through your entire report. Can you answer my 03:54:38
question? 03:54:40
ATTORNEY BORDER: The same objection. 03:54:44
A. So I did refer to Exhibit 1417 in 03:54:46
my report or declaration and -- but I referred 03:54:50
to Page 2 about the teachings about performing 03:54:53
an authentication of the device. If you want 03:54:58
me to answer your question about with respect 03:55:00
to the RADIUS protocol, I would want to take a 03:55:03
look at various RADIUS documents starting with 03:55:06
the spec and we can take it from there. 03:55:09
Q. That's not my question. 03:55:13
A. But I don't have these things 03:55:14
memorized with respect to what words are used 03:55:16
in various protocol documents. 03:55:16
Q. That's not my question. 03:55:18
My question is: In view of your 03:55:19
exhibit, the one you submitted, 1417, can you 03:55:24

1 explain a supplicant's relationship to the 03:55:26
2 RADIUS server? 03:55:30
3 ATTORNEY BORDER: Objection. Outside 03:55:31
4 the scope. 03:55:31
5 **A. Yeah, so that -- that's my answer,** 03:55:31
6 **what I just gave.** 03:55:32
7 **If you want me to look at that with** 03:55:34
8 **respect to the RADIUS protocol, we can** 03:55:34
9 **establish some RADIUS protocol documents and** 03:55:36
10 **we can --** 03:55:37
11 Q. I don't. 03:55:38
12 **A. -- but I didn't refer to Page 1 of** 03:55:38
13 **this document. I referred to Page 2 and --** 03:55:41
14 Q. Of this document? Okay. 03:55:44
15 **A. -- and if you want me to give you** 03:55:44
16 **an answer, I don't have everything I've read** 03:55:46
17 **memorized. So we can start with providing me** 03:55:49
18 **some documents with respect to RADIUS and we** 03:55:52
19 **can take it from there.** 03:55:54
20 Q. So you don't know what a supplicant 03:55:55
21 is. Do you know if a supplicant is different 03:55:56
22 than a policy agent? 03:55:58
23 ATTORNEY BORDER: Objection. 03:55:59
24 Foundation. 03:55:59
25 **A. I don't -- I have not memorized** 03:56:00

everything I've read in my life and certainly 03:56:02
not with respect to all the documents in this 03:56:04
case or other documents that I may have seen 03:56:06
before. 03:56:09
So, again, I don't think this is a 03:56:11
memory test. I don't think I address that in 03:56:13
my declaration. 03:56:15
What I did find is I cited to 03:56:17
Page 2 of Exhibit 1417 with respect to 03:56:19
performing an authentication of a device. 03:56:24
Q. Where are you referring to in your 03:56:33
report? 03:56:34
A. I am at Paragraph 94 of my 03:56:35
declaration. 03:56:36
Q. So is it fair to say you're 03:56:37
disavowing Page 1 of Exhibit 1417 then? 03:56:39
ATTORNEY BORDER: Objection. Form. 03:56:42
A. No, that's not fair. You're 03:56:42
totally misrepresenting what I've said. I 03:56:44
told you I don't remember everything I've 03:56:47
read. If you want me to answer that, we can 03:56:48
start with looking at some RADIUS protocol 03:56:50
documents to answer that question, but I 03:56:52
haven't memorized things that I've not 03:56:55
directly reference in my report or even the 03:56:58

1 **things I have referenced in my report or my** 03:56:59
2 **report itself. I don't have everything I've** 03:57:02
3 **read or read about committed to memory.** 03:57:05
4 Q. Are you willing to answer questions 03:57:13
5 about Page 2 of Exhibit 1417 then? 03:57:13
6 **A. I'm willing to answer questions** 03:57:17
7 **about my declaration and what I've cited to.** 03:57:19
8 Q. Do you know if a policy agent -- 03:57:24
9 have you opined on a policy agent; right? We 03:57:26
10 can agree on that? That's in your report? 03:57:29
11 **A. That's in my report somewhere.** 03:57:31
12 Q. Do you know if a policy agent is 03:57:35
13 related or the same as a supplicant? 03:57:37
14 ATTORNEY BORDER: Objection. Form. 03:57:40
15 Outside the scope. 03:57:42
16 **A. I don't think I've used the word** 03:57:43
17 **"supplicant" in my report. If you think** 03:57:44
18 **that's not right, you can show me where and we** 03:57:46
19 **can look at it.** 03:57:48
20 Q. Is it your position that if you 03:57:49
21 don't use a word in your report, then you 03:57:50
22 don't need to testify about it? 03:57:53
23 **A. I don't think that's exactly what** 03:57:58
24 **I'm saying. I'm just saying that you're** 03:57:59
25 **asking me a question about something, whether** 03:58:00

one thing is another thing, and I don't think 03:58:04
I've had a direct opinion about that in my 03:58:07
report. 03:58:09
Q. Okay. Outside the scope -- let me 03:58:09
strike that. Let's just say this: As a 03:58:10
person of ordinary skill in the art, do you 03:58:12
know what a supplicant is? 03:58:14
ATTORNEY BORDER: Objection. Outside 03:58:17
the scope. 03:58:17
A. So I haven't gotten that memorized 03:58:19
with respect to RADIUS or potentially other 03:58:21
uses in other contexts. So I would want to 03:58:24
take some time to look that up. That is 03:58:26
mentioned in one of the documents I've cited 03:58:29
to, but not on the page I cited to, and I 03:58:32
don't believe I used that word in my report at 03:58:35
all. 03:58:37
Q. Okay. Let's turn to Page 114 or 03:58:38
Paragraph 114. Let me know when you get 03:58:44
there. 03:58:58
A. Okay. I'm at Paragraph 114 of my 03:59:07
declaration. 03:59:09
Q. Your testimony is that a POSITA 03:59:10
would recognize that checking for antivirus 03:59:12
software would merely be an additional item 03:59:15

for server 215, paren, GateKeeper, to check in 03:59:18
the authentication process already disclosed 03:59:22
by Krantz. 03:59:24
Can you explain that? 03:59:25
A. I mean, it's what I say it is. 03:59:31
This is what a POSITA would recognize and 03:59:35
that's what they would, and I think we can 03:59:37
look at the rest of the paragraph for why 03:59:39
that's so. 03:59:43
Q. How would Krantz or the server 215 03:59:49
in Krantz check for an antivirus software? 03:59:54
What would have to be done? 03:59:57
A. Well, like Krantz, Herrmann 04:00:31
discloses that a policy server may enforce a 04:00:32
variety of different types of security 04:00:39
policies or rules, and one such rule to be 04:00:40
authorized for network access would be a 04:00:45
policy requiring that specific virus 04:00:47
protection program is operational on each 04:00:50
client device that is connecting to the 04:00:53
network and that comes from Herrmann. 04:00:54
Q. So would Krantz need a policy 04:00:56
server 460 of Herrmann to check for antivirus 04:00:57
software as the additional item? 04:01:04
A. So Krantz has a server 215 I've 04:02:28

1 **mapped out to the GateKeeper, and that server** 04:02:32
2 **simply needs to perform the function to** 04:02:39
3 **enforce the rules, which it's already doing** 04:02:45
4 **through -- with respect to user** 04:02:47
5 **authentication, that the user must be** 04:02:50
6 **authenticated to access the network or second** 04:02:53
7 **network, and it would be a simple software** 04:02:55
8 **modification of that.** 04:02:59
9 **I don't think it has to have a** 04:03:01
10 **separate server. That's not what I'm saying** 04:03:03
11 **here, but it's that Krantz would simply be** 04:03:05
12 **modified, and they would have been successful** 04:03:08
13 **because Krantz and Herrmann both disclose a** 04:03:11
14 **policy server or equipment that enforces a** 04:03:16
15 **variety of different security policies, and** 04:03:21
16 **the security policy as highlighted by the '450** 04:03:22
17 **patent includes authentication of a user, and** 04:03:25
18 **we looked at that a little earlier in this** 04:03:31
19 **portion of the deposition.** 04:03:33
20 Q. You said "simple software 04:03:34
21 modification." What would be the -- in this 04:03:36
22 context, about the additional item. So what 04:03:39
23 would be the simple software modification? 04:03:42
24 Would it be a Krantz? 04:03:45
25 **A. It's to checking for antivirus** 04:03:47

1 **software in the server of 215 of Krantz.** 04:03:49
2 Q. So the simple software modification 04:03:52
3 would be to Krantz's server 215? 04:03:54
4 **A. That's what I say. It's the** 04:03:59
5 **checking for antivirus software would merely** 04:04:00
6 **be an additional item for server 215 to check** 04:04:03
7 **in the authentication process already** 04:04:05
8 **disclosed by Krantz. So --** 04:04:07
9 Q. Would Krantz -- 04:04:11
10 **A. -- it's done in software. It might** 04:04:11
11 **not say it here, but it does say checking for** 04:04:12
12 **software, but it would be done in software.** 04:04:14
13 Q. In software. 04:04:17
14 The modification -- the simple -- 04:04:18
15 let me get this straight. The simple software 04:04:20
16 modification would be to Krantz to check for 04:04:23
17 the antivirus software? 04:04:24
18 **A. It would just be an additional item** 04:04:29
19 **to check for in the existing authentication** 04:04:31
20 **process already disclosed by Krantz.** 04:04:33
21 Q. But you said there would be a 04:04:35
22 simple software modification as well in your 04:04:36
23 testimony a minute ago; right? 04:04:38
24 **A. Yeah, to check for the antivirus** 04:04:39
25 **software.** 04:04:41

Q. Would Krantz need any additional 04:04:42
infrastructure to check for the antivirus 04:04:44
software? 04:04:46
ATTORNEY BORDER: Objection. Outside 04:04:50
the scope. 04:04:51
A. Well, the modification, as I laid 04:04:55
out through my declaration, I'll let it speak 04:04:57
for itself, but one of the modifications was 04:04:59
adding a software -- a simple software 04:05:01
modification to the client to collect 04:05:04
information, and another modification here 04:05:06
would be for modifying the authentication 04:05:09
process already in Krantz to include checking 04:05:14
for antivirus software and enforcing that 04:05:18
rule. 04:05:23
Q. Is Krantz server 215, is that 04:05:25
what's known as a server-side component? 04:05:29
A. Well, I mean, we talked about this 04:05:38
earlier, maybe in the first part, but Krantz 04:06:35
discloses that server 215 is a logical 04:06:38
representation, but that it can include 04:06:42
separate other devices, but the component -- 04:06:44
your question is kind of oddly stated because 04:06:52
a server component implies something that's 04:06:55
part of the server, but the server 215 is a 04:06:57

server. So it's just a weird question. 04:07:00
Q. Let me try a better question. 04:07:03
So I'm trying to get to this 04:07:05
notion, I think you mentioned before, this 04:07:06
concept of a client side versus server side 04:07:08
earlier, and the question is: Is the server 04:07:10
in Krantz, would that be considered to be on 04:07:13
the server side? 04:07:15
A. Well, the server I've mapped to the 04:07:23
GateKeeper of the claim, and it seems odd to 04:07:27
refer to the server as server side, but it's a 04:07:37
server. 04:07:39
Q. Server side server, yeah. 04:07:41
A. So, I mean, the server may have 04:07:44
modules and maybe you'd said those are on the 04:07:46
server side because they're on the server, but 04:07:50
it's weird to -- 04:07:52
Q. Let's put it this way, the server 04:07:53
on Krantz is not client side; is that fair? 04:07:55
A. I mean, servers and clients are 04:07:58
different, and the Figure 2 is it in Krantz? 04:07:59
Shows the client separate and distinct from 04:08:05
the server. 04:08:08
Q. A POSITA -- 04:08:13
A. Sorry. I'm done. 04:08:14

Q. Your testimony is a POSITA would 04:08:17
recognize that checking for antivirus software 04:08:25
would merely be an additional item for server 04:08:27
215. 04:08:30
For Krantz to check for antivirus 04:08:32
software, would that require Herrmann's proxy 04:08:35
server as well? 04:08:40
A. I don't think I say anything about 04:08:51
the proxy server in this paragraph. I don't 04:08:52
recall that I have elsewhere other than maybe 04:08:54
I'm just describing it. 04:08:57
Q. Would that require Herrmann's 04:08:59
Integrity gateway server? 04:09:01
A. I don't recall saying anything like 04:09:16
that in my declaration. 04:09:17
Q. And Herrmann also has its own 04:09:19
RADIUS server. Would you combine Herrmann's 04:09:21
RADIUS server with Krantz as well? 04:09:24
A. I think they both have RADIUS 04:09:28
servers and interact with them for partly 04:09:30
authentication purposes, indicates that it 04:09:34
would be a successful modification to make 04:09:36
because two systems share some common 04:09:39
components and protocols. 04:09:44
Q. Well, you said something 04:09:45

interesting. So both Krantz and Herrmann have 04:09:46
RADIUS servers; right? Is that what you're 04:09:49
saying? 04:09:50
A. I think some embodiments of -- 04:09:51
Q. Some embodiments -- 04:09:53
A. -- of Krantz and I believe also 04:09:53
Herrmann. I mean, I'm taking what you said, 04:09:56
but we can look at that. I know we looked at 04:10:00
RADIUS servers at least in one of the 04:10:02
references earlier. 04:10:04
Q. Yeah. That's fine. 04:10:05
Is the RADIUS server in Herrmann 04:10:09
similar in some embodiments to the server 215 04:10:11
in Krantz? 04:10:14
A. I mean, whether they're similar or 04:10:21
even slightly different, it's still -- it's 04:10:23
still a reason that -- it's not a reason why 04:10:26
there would be failure in combining the two 04:10:31
references. 04:10:34
Q. Can the RADIUS server in Herrmann 04:10:35
evaluate policy data? 04:10:40
A. I mean, I don't recall relying on 04:10:58
the RADIUS server of Herrmann evaluating 04:10:59
policy data in the combination. 04:11:02
I mean, if you think I said that, 04:11:05

we can look at it, but I don't -- I don't 04:11:06
think I've really talked about that in my 04:11:08
declaration. 04:11:11
Q. Would you agree that Herrmann 04:11:17
requires a proxy server and Integrity gateway 04:11:19
server and a policy server to evaluate policy 04:11:25
data at least? 04:11:29
A. I mean, my combination is not the 04:11:34
wholesale combination of all the elements of 04:11:36
Herrmann into Krantz. That's a misreading of 04:11:38
what I've laid out. I've said specifically 04:11:42
there are the teachings of Herrmann with 04:11:45
respect to an agent that can be implemented in 04:11:48
software in the system of Krantz, and that the 04:11:51
existing authentication processes already 04:11:56
disclosed by Krantz can be modified to check 04:11:58
for antivirus software, and so it's -- it's -- 04:12:02
I don't think I have opinions about what's 04:12:09
required solely in Herrmann. It's really 04:12:10
taking the teachings of Herrmann and modifying 04:12:12
as I've laid out in my declaration. 04:12:14
Q. Well, that's what I'm trying to 04:12:16
figure out, your teachings of Herrmann. I 04:12:18
mean, the teachings of Herrmann include a 04:12:19
proxy server, Integrity server, and policy 04:12:21

server, and I want to make sure, and I think 04:12:23
it's your testimony, correct me if I'm wrong, 04:12:25
that those server-side elements are not being 04:12:27
combined with Krantz? 04:12:30
A. I think it's a misunderstanding to 04:12:31
say the teachings of Herrmann refer to 04:12:33
everything that Herrmann must teach. 04:12:35
There are specific teachings of 04:12:37
Herrmann with respect to, for example, there 04:12:38
is an agent on the client that scans the -- 04:12:41
that performs a scan in gathering information 04:12:46
on the client, and that there is a teaching 04:12:48
that Herrmann would enforce rules with respect 04:12:54
to antivirus software and that simply could be 04:12:58
added, that check for antivirus software could 04:13:02
merely be an additional item that the server 04:13:05
215 in Krantz can check in the authentication 04:13:09
process that is already disclosed by Krantz. 04:13:13
Q. Okay. 04:13:15
A. I'm not -- when I say teachings of 04:13:16
Herrmann, I don't mean you have to take 04:13:19
everything that Herrmann teaches and cram it 04:13:21
into Krantz. That's a misunderstanding of 04:13:23
what -- a combination or any combination I've 04:13:27
ever worked on would entail. 04:13:29

Q. Well, that's what we're here for, 04:13:31
sir. So that's what we're trying to suss out, 04:13:32
is the what teachings were taken and which 04:13:35
teachings were not taken; right? And I heard 04:13:36
you say policy agent of Herrmann, right, is 04:13:39
going to be combined with Krantz; correct? 04:13:44
A. Yeah, I've laid out in my 04:13:46
declaration what the teachings of Herrmann are 04:13:47
to be incorporated into Krantz. 04:13:50
Q. And not in your declaration is a 04:13:55
proxy server, Integrity gateway server, or the 04:13:57
policy server at Herrmann; correct? 04:13:59
A. I mean, my declaration stands for 04:14:03
itself. I don't recall a combination where I 04:14:04
took those elements on a permanent and crammed 04:14:08
them into Krantz. 04:14:12
What the combinations are is laid 04:14:15
out in my declaration. 04:14:16
Q. Let's go to Paragraph 77. 04:14:22
A. Okay. 04:14:36
Q. And you can read the whole 04:14:37
paragraph, but the last kind of clause or last 04:14:39
sentence says that: A POSITA would understand 04:14:42
this to be applying the security policy to a 04:14:45
network device because the server of Krantz is 04:14:48

1 inspecting credentials and can authorize 04:14:52
2 access based on the inspection results, e.g., 04:14:54
3 by matching entries in a database. 04:14:58
4 Do you see that? 04:15:01
5 **A. Yes.** 04:15:01
6 Q. Does Herrmann match entries in a 04:15:05
7 database? 04:15:07
8 **A. I don't have every word of Herrmann** 04:18:10
9 **memorized. I'm just taking a look through a** 04:18:12
10 **few paragraphs with respect to authenticating** 04:18:16
11 **users. For example, Paragraph 11, I don't see** 04:18:18
12 **a reference to a database, but whether it does** 04:18:21
13 **or not, I don't think would impact the ability** 04:18:24
14 **to combine any of these systems or the fact** 04:18:29
15 **that it would be successful.** 04:18:32
16 Q. I'm sorry. You don't see -- okay. 04:18:33
17 I see it here. 04:18:35
18 **A. I'm looking at a few paragraphs.** 04:18:36
19 Q. Paragraph 11? 04:18:39
20 **A. Yes, but I don't have the ability** 04:18:40
21 **to search Herrmann quickly --** 04:18:42
22 Q. Okay. 04:18:43
23 **A. -- which in a remote deposition I** 04:18:43
24 **might have, but I don't see the word** 04:18:45
25 **"database" used in a few of these paragraphs** 04:18:47

1 **running 11 where it's talking about user** 04:18:51
2 **authentication.** 04:18:53
3 **I might have missed it. It could** 04:18:57
4 **be somewhere else, but I don't have every word** 04:18:59
5 **of Herrmann memorized.** 04:19:02
6 Q. If it was in Herrmann, do you think 04:19:07
7 you would have put it in your declaration? 04:19:09
8 **A. I might have, but I don't know.** 04:19:12
9 Q. We talked earlier about 04:19:23
10 provisioning data. Do you remember that 04:19:24
11 discussion very early on? 04:19:25
12 **A. I certainly remember provisioning.** 04:19:33
13 **I'm not sure if it was provisioning data or** 04:19:34
14 **what the context was.** 04:19:38
15 Q. Fair enough. 04:19:38
16 Let me ask you this question then: 04:19:39
17 As a person of ordinary skill in the art, does 04:19:41
18 the term "provisioning data" have a known 04:19:43
19 meaning to you? 04:19:47
20 **A. I mean, I wouldn't think it has any** 04:20:14
21 **meaning beyond the combination of two words in** 04:20:16
22 **the meaning -- and their meaning together.** 04:20:18
23 Q. Okay. Can we go to Page -- let's 04:20:20
24 go to Paragraph 109. 04:20:26
25 **A. Okay.** 04:20:36

Q. And I guess I'd like to talk about, 04:20:41
do you see the claim limitations on Page 62 04:20:43
where it says: Romanette i, the security 04:20:46
policy, including one or more requirements 04:20:49
pertaining to the authentication and the 04:20:51
information? 04:20:53
Do you see that? 04:20:55
A. As part of the claim language? 04:20:57
Q. Yes. 04:20:59
A. Yes, I see that. 04:21:01
Q. What's the difference between 04:21:03
authentication and the information in your 04:21:06
understanding? 04:21:08
A. Well, authentication is with 04:21:41
respect to the authentication -- 04:21:43
authentication is different than the 04:21:46
information, which refers to the collected 04:21:50
information from scanning the device 04:21:53
regarding -- the information regarding the 04:21:57
device that's collected by scanning device, 04:21:58
which is what the information I believe is 04:22:03
referring to in the claim, in Claim 1. 04:22:06
Q. Okay. Let's try to untangle this a 04:22:09
little bit. 04:22:12
So in Paragraph 109 of your 04:22:13

1 declaration, you say: For instance, it may 04:22:16
2 also be that client 205 and server 215 04:22:20
3 exchange EAP messages to pass certificates, 04:22:25
4 keys, and supported cipher suites. 04:22:29
5 Do you see that, sir? 04:22:37
6 **A. I do, but it goes on.** 04:22:39
7 Q. Okay. It goes on, but do you see 04:22:40
8 that section there? 04:22:42
9 **A. Yes.** 04:22:43
10 Q. Are EAP messages to pass 04:22:45
11 certificates, keys, and supported cipher 04:22:47
12 suites information or requirements relating to 04:22:49
13 authentication or can it be both? 04:22:52
14 **A. Well, it's the other credential** 04:22:58
15 **information. Maybe it's changed and that** 04:23:00
16 **requires -- that refers to the information.** 04:23:04
17 **One example given, I don't remember which,** 04:23:06
18 **Herrmann or Krantz, certainly talk about** 04:23:11
19 **username and password. They may both talk** 04:23:18
20 **about username and password, and certainly** 04:23:21
21 **that is information, username and password, it** 04:23:24
22 **would be credential information, and one** 04:23:27
23 **example of credential information, they can** 04:23:29
24 **use the password --** 04:23:32
25 Q. So is credential information -- so 04:23:33

1 I heard your testimony. Is credential 04:23:35
2 information -- 04:23:37
3 **A. Can I finish my answer, because I** 04:23:38
4 **wasn't really totally done because you asked** 04:23:39
5 **about the difference.** 04:23:42
6 Q. Yes. 04:23:42
7 **A. And I really didn't have an** 04:23:42
8 **opportunity to explain.** 04:23:45
9 Q. So you're focusing on information 04:23:46
10 now, but you want to explain the difference 04:23:47
11 with authentication? 04:23:49
12 **A. You were asking about requirements** 04:23:50
13 **pertaining to the authentication.** 04:23:51
14 Q. Yes. 04:23:53
15 **A. Those requirements are that the** 04:23:53
16 **user and password match or presumably are** 04:23:55
17 **correct as opposed to just anything. So, you** 04:23:58
18 **know, information --** 04:24:03
19 Q. Where is the matching in your 04:24:05
20 declaration? 04:24:06
21 **A. Well, I mean, I think** 04:24:09
22 **authentication involves the fact that the** 04:24:10
23 **supplied information is actually correct.** 04:24:14
24 **Otherwise, what's the use of authentication if** 04:24:17
25 **you accept any username and any password with** 04:24:18

that username? That's not authentication. 04:24:21
Q. Is that in your declaration? 04:24:23
A. I don't recall if it is, but, I 04:24:31
mean, I think that's the plain meaning of 04:24:33
authentication, which is, you know, if you 04:24:36
authentic a user, you aren't simply just 04:24:39
accepting any information that's provided, and 04:24:43
say, Hey, you're authenticated. 04:24:46
It's that there is a -- and 04:24:48
certainly, I think -- is it Krantz that shows 04:24:50
looking that up in a database to make sure it 04:24:53
matches? That's consistent with the plain and 04:24:55
ordinary meaning of doing authentication, and 04:24:58
certainly a requirement pertaining to the 04:25:02
authentication should be that you're probably 04:25:04
authenticated. 04:25:09
Q. So let me understand. So back to 04:25:09
109 where it talks about EAP messages to pass 04:25:12
certificates, keys, and supported cipher 04:25:15
suites, and then the brackets after that says 04:25:17
"information." 04:25:19
Do you see that? 04:25:19
Do you see that? 04:25:23
A. Yes. 04:25:23
Q. So where can I find -- would you 04:25:29

1 agree that the claim requires one or more 04:25:31
2 requirements pertaining to authentication and 04:25:34
3 information, and if you agree with that, my 04:25:36
4 question would be: Where can I find in your 04:25:39
5 declaration the requirements pertaining to the 04:25:42
6 information? 04:25:45
7 **A. Well, I mean, that's what it says** 04:25:49
8 **here, which is that that's information, but** 04:25:52
9 **other credential information is also** 04:25:56
10 **information, but I didn't have the bracket** 04:25:58
11 **information next to other credential** 04:26:01
12 **information.** 04:26:03
13 Q. You just didn't bracket it there, 04:26:03
14 but that's the position that other credential 04:26:05
15 information is also, quote, the claimed 04:26:07
16 information? 04:26:09
17 **A. I mean, that is -- I mean, if you** 04:26:11
18 **look earlier, I think about how that's** 04:26:15
19 **information collected regarding the device,** 04:26:17
20 **which is gathered in Krantz, and so that's** 04:26:20
21 **probably in element 1.2 analysis.** 04:26:25
22 Q. So would, again, exchange EAP 04:26:31
23 messages, the pass certificates, keys, and 04:26:37
24 supported cipher suites, would that relate to 04:26:39
25 the claimed requirements pertaining to the 04:26:41

1 authentication? 04:26:44
2 **A. Well, to the extent that the** 04:26:56
3 **authentication might be machine** 04:26:58
4 **authentication, certainly certificates may be** 04:26:59
5 **part of information or might be part of what** 04:27:05
6 **is used in an authentication process for a** 04:27:12
7 **machine authentication. I think I talk about** 04:27:18
8 **that elsewhere in this declaration.** 04:27:20
9 Q. Would those same certificates 04:27:22
10 though also potentially be claimed "the 04:27:24
11 information" as well? 04:27:28
12 **A. Well, all this -- you know, what's** 04:27:33
13 **collected from scanning a device are** 04:27:36
14 **collectively the information regarding the** 04:27:40
15 **device, and the use of the information is** 04:27:42
16 **referring to all the information scanned and** 04:27:46
17 **collected from the device, which earlier we** 04:27:50
18 **talked about how it's gathering, can be** 04:27:53
19 **gathered from the device consistent with the** 04:27:56
20 **plain and ordinary meaning of scanning.** 04:27:58
21 Q. Which would include the 04:28:00
22 certificates then? 04:28:01
23 **A. Which -- it's including** 04:28:03
24 **certificates, keys, and supported cipher** 04:28:07
25 **suites, and that's what, you know, is** 04:28:09

1 **gathering, you know, if the keys are from the** 04:28:14
2 **client or the certificates are from the** 04:28:17
3 **client, the cipher suites are what the -- what** 04:28:20
4 **the client supports, that would be information** 04:28:22
5 **gathered from and about the client.** 04:28:25
6 Q. Let's go to Paragraph 110. Do you 04:28:27
7 see at the bottom where you talk about a 04:28:35
8 configuration subfile to indicate whether or 04:28:37
9 not operating system credentials should be 04:28:39
10 used for authentication? 04:28:41
11 Do you see that? 04:28:48
12 **A. Yeah. I mean, there is some text** 04:28:50
13 **omitted from there, but I see those words that** 04:28:53
14 **you read, but just not altogether.** 04:28:59
15 Q. Is a configuration subfile 04:29:04
16 considered to be the claimed information? 04:29:07
17 **A. I mean, I don't think it's saying** 04:30:21
18 **that exactly here. What I'm saying are at** 04:30:22
19 **least one requirement pertaining to the** 04:30:25
20 **information are --** 04:30:27
21 Q. Where are you reading? 04:30:32
22 **A. That's the bracketed part on the** 04:30:34
23 **top of Page 63.** 04:30:36
24 Q. Okay. Thank you. 04:30:38
25 **A. And that's, for example, the** 04:30:38

1 **parameters element at Line 67. That** 04:31:00
2 **parameters element at Line 67 included in the** 04:31:33
3 **subfile that indicates whether or not** 04:31:37
4 **operating system credentials should be used** 04:31:40
5 **for authentication, and so if you look at --** 04:31:42
6 **there is a chart.** 04:31:45
7 Q. And I apologize, sir, I don't know 04:31:52
8 what you're directing me to. 04:31:53
9 **A. Oh, sorry. That's Paragraph -- I** 04:31:54
10 **was looking at Paragraph 99 of Krantz, and it** 04:31:55
11 **refers to a chart, Page 11, or is that** 04:31:59
12 **Column 11? No, Page 11. Oh, which is -- the** 04:32:07
13 **exhibit is Page 16 of 21, and Line 67 says** 04:32:13
14 **there is an element, which is MSChapV2** 04:32:18
15 **parameters, if you look on Page 11 at the top** 04:32:26
16 **--** 04:32:32
17 Q. Okay. 04:32:32
18 **A. -- of Krantz.** 04:32:33
19 Q. Okay. I'm with you. 04:32:33
20 **A. There is a Line 67 there.** 04:32:35
21 Q. Okay. 04:32:38
22 **A. This is a bunch of XML.** 04:32:38
23 Q. Okay. 04:32:41
24 **A. Sensible markup language, and** 04:32:41
25 **Line 67, it spans two lines, but it's -- one** 04:32:47

1 **line is an excess element, whose name is --** 04:32:51
2 **main property is MSChapV2 parameters.** 04:32:57
3 Q. Okay. 04:33:04
4 **A. And it's that Paragraph 99 is** 04:33:05
5 **referring to the information there. So** 04:33:09
6 **whether or not -- and that indicates whether** 04:33:14
7 **or not operating system credentials should be** 04:33:16
8 **used for authentication.** 04:33:18
9 **So that's at least one requirement** 04:33:20
10 **pertaining to the information, which is are** 04:33:23
11 **those operating system credentials, should** 04:33:26
12 **they be used, whether they should be used for** 04:33:31
13 **authenticities, that value is at least one** 04:33:37
14 **requirement pertaining to information.** 04:33:39
15 Q. Okay. I think I've got it. So 04:33:40
16 where you're pointing to me in Line 67 on 04:33:44
17 Page 11, which says "MSChapV2," and then the 04:33:45
18 following language in your report is referring 04:33:51
19 to the claim limitation "at least one 04:33:54
20 requirement pertaining to the information"; is 04:33:56
21 that right? 04:34:00
22 **A. Yeah, I think that's whether --** 04:34:00
23 **whether or not those operating system** 04:34:03
24 **credentials should be used for authentication,** 04:34:04
25 **that bit of information specified by that** 04:34:06

1 **MSChapV2 parameter element.** 04:34:09
2 Q. Okay. So it's not -- so by that 04:34:11
3 same token, so I understand, at Line 67, the 04:34:15
4 MSChapV2 parameter's element, that includes 04:34:17
5 the configurations of file to indicate whether 04:34:20
6 or not operating system credentials, that 04:34:23
7 whole language there, that is not at least one 04:34:25
8 requirement pertaining to the authentication 04:34:30
9 in the claim. 04:34:34
10 Do I have that right? 04:34:36
11 **A. Well, part of your question was a** 04:34:38
12 **little backwards. You said that the** 04:34:40
13 **parameters included the configuration set** 04:34:42
14 **file, but it's the parameter element is** 04:34:45
15 **included in a configuration set file. I think** 04:34:48
16 **that's --** 04:34:50
17 Q. Okay. Well, you get my point or 04:34:51
18 maybe you don't, but the question is: We're 04:34:54
19 talking about the MSChapV2 parameter's element 04:34:57
20 at Line 67 and then the following language in 04:35:00
21 your report. That is not related to at least 04:35:02
22 one requirement pertaining to the 04:35:06
23 authentication in the claim. That's not your 04:35:09
24 position? 04:35:11
25 **A. Well, there is -- there is --** 04:35:12

1 **whether the credentials, operating system** 04:35:15
2 **credentials, should be used for** 04:35:18
3 **authentication, and all of that is requirement** 04:35:20
4 **pertaining to authentication, but whether or** 04:35:24
5 **not the operating system credentials should be** 04:35:26
6 **part of that or not are at least one** 04:35:29
7 **requirement pertaining to the information,** 04:35:32
8 **because the information is pertaining to the** 04:35:33
9 **operating system credentials, and the** 04:35:38
10 **information parameter about whether they** 04:35:40
11 **should be used is a requirement pertaining to** 04:35:45
12 **the information.** 04:35:48
13 Q. Later you say in that paragraph, 04:35:50
14 you say: Exemplary XML configuration schema, 04:35:51
15 S-C-H-E-M-A. 04:35:57
16 Do you see that? 04:36:01
17 **A. Yes, and that's what I call the** 04:36:06
18 **table on Page 11, which is I guess part of** 04:36:10
19 **Paragraph 91.** 04:36:16
20 Q. And which does that relate to? The 04:36:17
21 information or the authentication? 04:36:20
22 **A. Well, part of it is at the** 04:36:24
23 **parameter element on Line 67.** 04:36:26
24 Q. Where is the parameter? Oh, 04:36:33
25 MSChapV2 parameter again? 04:36:34

1 **A. Yeah.** 04:36:36
2 Q. Okay. 04:36:37
3 **A. That contains information about** 04:36:37
4 **whether the credential should be used for** 04:36:40
5 **authentication. Whether it should be used for** 04:36:42
6 **authentication is a security policy that** 04:36:45
7 **includes at least one requirement pertaining** 04:36:49
8 **to the authentication. The requirement is if** 04:36:50
9 **it's true, you need to use the security** 04:36:53
10 **operating system credentials for** 04:36:56
11 **authentication. So that would be part of it,** 04:36:58
12 **a security policy that includes at least one** 04:37:00
13 **requirement pertaining to the authentication.** 04:37:03
14 Q. But where's the XML -- is the XML 04:37:05
15 configuration schema, where is that shown in 04:37:09
16 Table 11? 04:37:11
17 **A. It's all the schema.** 04:37:12
18 Q. The whole thing is -- 04:37:14
19 **A. The whole thing is an example** 04:37:15
20 **schema from Line 1 to Line 93.** 04:37:18
21 Q. Let's go to Paragraph 111. 04:37:21
22 ATTORNEY BORDER: Is this a good time 04:37:23
23 to take a break? 04:37:24
24 ATTORNEY MICHALEK: Sure. 04:37:25
25 ATTORNEY BORDER: We've been going 04:37:26

about an hour and 15. 04:37:26
THE WITNESS: Sure. 04:37:28
ATTORNEY MICHALEK: Works for me. 04:37:28
ATTORNEY BORDER: Quick break. 04:37:30
ATTORNEY MICHALEK: Yeah. 04:37:31
CERTIFIED STENOGRAPHER: Off the 04:37:32
stenographic record at 4:37 p.m. 04:37:32
- - - 04:37:33
(Whereupon, a short recess was 04:37:33
taken.) 04:37:33
- - - 04:37:34
CERTIFIED STENOGRAPHER: Back on the 04:44:23
stenographic record at 4:44 p.m. 04:44:24
BY ATTORNEY MICHALEK: 04:44:27
Q. Dr. Houh, can you please turn to 04:44:32
Paragraph 78 of your report. 04:44:34
A. Okay. 04:44:45
Q. And direct you towards the middle 04:44:46
where it says: Other audit data provided by 04:44:49
Krantz's network device may include, for 04:44:52
example, user identifiers and passwords. 04:44:55
Do you see that? 04:44:57
A. Yes. 04:45:00
Q. So is it your testimony that a 04:45:01
user's identifier or password can be audit 04:45:03

1 data within the context of the claims? 04:45:06
2 **A. Sorry, what paragraph were we** 04:48:26
3 **initially looking at, please?** 04:48:28
4 Q. We're at Paragraph 78. 04:48:29
5 **A. Well, if you look at Page 123,** 04:48:57
6 **which is directed to a claim element that** 04:49:00
7 **actually talks about an audit, which I don't** 04:49:05
8 **think this section for this claim element with** 04:49:11
9 **respect to Claim 1 does, but what I talk about** 04:49:15
10 **there are the disclosures in Krantz are** 04:49:20
11 **consistent -- this is Page 123 near the top:** 04:49:24
12 **These disclosures of Krantz are consistent** 04:49:28
13 **with the '450 patent's description of the** 04:49:31
14 **audit, and that audit data can be used to** 04:49:34
15 **identify the access device and/or a user of** 04:49:36
16 **the device, and I cite to the '450 patent,** 04:49:39
17 **Column 12, Lines 9 to 11, where it says: In** 04:49:44
18 **some embodiments, authenticate user step 440** 04:49:48
19 **is considered part of the security policy** 04:49:52
20 **audit. And in addition, Column 11, Lines 40** 04:49:54
21 **through 47, talk about in optional** 04:49:59
22 **authenticate user step 440, policy auditor** 04:50:04
23 **authenticates the identity of access device** 04:50:08
24 **230 and/or a user of access device 230. The** 04:50:10
25 **authentication may include receipt of a** 04:50:15

username and password or the like, and so I 04:50:17
think it's consistent with what -- 04:50:20
Q. What's consistent? You said "it." 04:50:27
What's consistent? Paragraph 78? 04:50:28
A. Well, again, Paragraph 78 doesn't 04:50:32
talk about the claim in which Paragraph 78 is 04:50:34
located. 04:50:40
Q. I'm not asking you about the claim. 04:50:41
I'm asking you about -- well, now I'll ask 04:50:42
you. 04:50:44
Are there other audit data provided 04:50:44
by Krantz's network device may include, for 04:50:45
example, user identifiers and passwords, is 04:50:46
that a true statement? 04:50:49
A. I think based on what the 04:50:52
disclosures of the '450 are, I stand by that 04:50:53
statement because -- 04:50:56
Q. Okay. 04:50:57
A. -- the audit of an audit data can 04:50:57
be used to identify the access device and/or 04:51:00
user of the device as I explain on Page 123 in 04:51:02
Paragraph 208. And so that's a section in 04:51:08
which Paragraph 78 is located, doesn't have a 04:51:11
claim requirement about audit or audit data, 04:51:14
but this section does, and that's why I'm 04:51:16

talking about the consistency of Krantz's 04:51:19
disclosures are consistent with what the '450 04:51:26
patent talks about with respect to audit and 04:51:32
audit data. 04:51:35
Q. So it's a true statement? 04:51:36
A. I stand by my statements here. 04:51:37
Q. It's true? 04:51:38
A. I stand by all my statements in my 04:51:39
declaration. 04:51:41
Q. Okay. 04:51:41
A. I'm not -- 04:51:42
Q. Can a user identifier and password 04:51:43
relate to authentication? 04:51:48
A. I mean, those are examples given in 04:51:54
many of these patents about one way of 04:51:56
performing authentication. 04:52:00
Q. Can you open up the '450 patent, 04:52:01
please. Can you turn to Column 14, Line 10, 04:52:03
and it says: The method used to support 04:52:21
auditing functionality over the existing 8021X 04:52:36
protocol implementation is complicated and 04:52:39
not -- let me try again. 04:52:39
It says: The method used to 04:52:43
support auditing functionality over the 04:52:45
existing 8021X protocol implementation is 04:52:47

1 complicated and not an obvious variation of 04:52:51
2 the 8021X protocol. 04:52:53
3 Do you see that, sir? 04:52:56
4 **A. I see those words.** 04:53:31
5 Q. Do you know what they mean? 04:53:33
6 **A. Well, I believe it's talking about** 04:55:34
7 **this other patent application referenced here** 04:55:37
8 **in that context, and it -- it -- it says -- it** 04:55:40
9 **means what it says, but I don't think I have** 04:55:46
10 **any opinion about the veracity of this** 04:55:49
11 **statement one way or the other in my** 04:55:54
12 **declaration.** 04:55:55
13 Q. Have you considered this statement 04:55:57
14 in your declaration? 04:55:57
15 **A. I considered the whole -- I** 04:55:59
16 **reviewed the whole of the '450 patent and I** 04:56:01
17 **considered everything, but just because** 04:56:04
18 **someone says something in a patent application** 04:56:06
19 **doesn't necessarily mean it should be taken as** 04:56:14
20 **the truth.** 04:56:18
21 **For example, the patent could say** 04:56:19
22 **the sky is green. The patent could say this** 04:56:21
23 **patent is totally not obvious over any prior** 04:56:24
24 **art. It doesn't mean it's true, and certainly** 04:56:27
25 **this is with respect to what's disclosed in** 04:56:30

this other provisional patent application. 04:56:33
Q. Does that go for Krantz and 04:56:35
Herrmann as well? 04:56:36
A. Well, Krantz and Herrmann have 04:56:39
teachings, and what they teach is what I rely 04:56:41
on, and so yeah, I mean, they're patent 04:56:43
applications just like everything else, but 04:56:49
they actually have specific teachings which I 04:56:51
point to and rely on. 04:56:53
Q. And this is not a teaching? 04:56:54
A. It is a teaching, but it doesn't 04:56:55
necessarily have to -- you know, patentees can 04:56:58
make all sorts of self-serving statements in 04:57:01
their patent applications and specifications. 04:57:03
You have to evaluate them in the actual 04:57:07
context of if you're trying to take a 04:57:10
statement for -- it's true, you have to 04:57:16
evaluate the veracity of certain statements 04:57:18
like this, but it's not a specific statement I 04:57:20
opined about in my declaration. 04:57:22
Q. Last line of questioning, a little 04:57:24
bit of housekeeping: Did you perform a claim 04:57:27
construction for your analysis in the '450 04:57:29
patent IPR? 04:57:31
A. So if you look at my claim 04:58:01

1 **construction paragraph, it says what it says,** 04:58:04
2 **which is --** 04:58:05
3 Q. Where are you? 04:58:06
4 **A. Paragraph 37, Page 19. So it's my** 04:58:07
5 **understanding for IPR -- this is a -- it's a** 04:58:12
6 **Philips' standard now under which claim terms** 04:58:15
7 **are given their ordinary and customary** 04:58:21
8 **meaning, as would have been understood by a** 04:58:23
9 **POSITA in light of the specification and** 04:58:26
10 **prosecution history I would add at the time of** 04:58:28
11 **the invention, unless the inventor has set** 04:58:31
12 **forth a special meaning for a term.** 04:58:33
13 **I've also been informed that claim** 04:58:35
14 **terms only need to be construed to the extent** 04:58:36
15 **necessary to resolve the unpatentability** 04:58:38
16 **inquiry, and I think my mappings are pretty** 04:58:42
17 **conventional, and I'm solidly within the** 04:58:46
18 **bounds and scope of what persons of ordinary** 04:58:49
19 **skill would understand the claim terms to** 04:58:52
20 **mean.** 04:58:54
21 Q. And with respect to that last 04:58:54
22 sentence, have you performed any -- applied 04:58:57
23 any claim constructions to any of the claim 04:58:59
24 limitations in your analysis? 04:59:01
25 **A. I haven't expressly offered any** 04:59:03

explicit claim constructions in terms of in my 04:59:05
declaration. 04:59:09
Q. Okay. 04:59:09
ATTORNEY MICHALEK: I'm finished. 04:59:10
Thank you for your time today, Dr. Houh. 04:59:10
THE WITNESS: Thank you. 04:59:12
ATTORNEY BORDER: Okay. No questions. 04:59:13
THE WITNESS: Great. 04:59:15
CERTIFIED STENOGRAPHER: Off the 04:59:17
stenographic record at 4:59 p.m. 04:59:17
- - - 04:59:18
(Time noted: 4:59 p.m.)

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CERTIFICATE OF STENOGRAPHIC REPORTER

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I further certify that present on

behalf of Petitioner, Cisco Systems, Inc. and Fortinet, Inc., were Scott M. Border, Esq., of Winston & Strawn, and present on behalf of Patent Owner, InfoExpress Inc., were Joseph M. Kuo, Esq., Brian R. Michalek, Esq., Brian Landry, Esq., and Andrew Schwerin, Esq., of Saul Ewing LLP.

I further certify that the original deposition will be transmitted to counsel for the Petitioners for transmission to Henry Houh, Ph.D. for reading and execution.

I further certify that I am not related to, nor associated with any of the parties or their attorneys, nor do I have any disqualifying interest, personal or financial in the actions within.

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

Richard Germosen

RICHARD GERMOSEN,
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California CSR No. 14391
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