UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC. And FORTINET, INC.
Petitioner

v.

INFOEXPRESS INC.
Patent owner

IPR 2024-00539 & IPR 2024-00677

Patent No. 8,051,460 & 8,578,444

EXAMINATION of HENRY HOUH

TAKEN ON

WEDNESDAY, DECEMBER 4, 2024

CERTIFIED STENOGRAPHER:
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EXAMINATION of HENRY HOUH, taken before JESSICA R. WAACK,Registered Professional Reporter, Registered Merit Reporter, Certified Realtime Reporter, Registered Diplomate Reporter, California Certified Realtime Reporter, New Jersey Certified Court Reporter (License No. 30XI008238700); Texas Certified Shorthand Reporter (License No. 11958); Washington State Certified Court Reporter (License No. 21007264); California Certified Shorthand Reporter (License No. 14420); New York Association Certified Reporter, New York Realtime Court Reporter and Notary Public of Washington, D.C. and the States of New York, Pennsylvania, Delaware and Virginia, at Winston & Strawn LLP, MetLife Building, 200 Park Avenue, New York, New York, on Wednesday, December 4, 2024, commencing at 9:04 a.m. and concluding at 5:12 p.m.

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INFORMATION REQUESTED

None

WITNESS INSTRUCTED NOT TO ANSWER

None

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** All original exhibits were attached to the original transcript **

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PROCEEDINGS

December 4, 2024, 9:04 a.m.

New York, New York

*****

HENRY HOUH, sworn

on oath and/or affirmed, called as a witness herein, was examined and testified as follows:

*****

HENRY HOUH, sworn

on oath and/or affirmed, called as a witness herein, was examined and testified as follows:

***** 09:04:31

EXAMINATION 09:04:31

BY MR. KUO: 09:04:31

Q. Good morning, Dr. Houh. My name 09:04:33
is Joe Kuo. We just met a few minutes ago. 09:04:35
I know you've been deposed numerous times, 09:04:40
so -- but just generally speaking, you 09:04:44
know, I'll ask you some questions today. 09:04:48
Give me your answers. 09:04:50
The court reporter is writing 09:04:51
down everything, so, you know, we'll try 09:04:52

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not to speak over one another. 09:04:55
If at any time you need a break, 09:04:58
just let me know. 09:05:00
If any of my questions are 09:05:02
unclear, let me know that too. I'll try to 09:05:03
clarify. It would help me if you could 09:05:05
tell me why you think it's unclear, and 09:05:09
then I can try to fix it. 09:05:11
Other than that, good to go? 09:05:15
A. Yes. Thank you. **09:05:19**
Q. All right. You supplied a 09:05:20
declaration in this matter involving the 09:05:24
'460 patent, correct? 09:05:27
A. Yes. **09:05:28**
Q. And so I'm going to hand to 09:05:29
you -- this was marked in the proceeding as 09:05:38
Exhibit 1003. 09:05:42
(Whereupon, Previously Marked 09:05:44
Exhibit 1003 is identified for 09:05:44
the record.) 09:05:48
THE WITNESS: Thank you. 09:05:48
BY MR. KUO: 09:05:50
Q. Can you just flip through and 09:05:51
confirm that's your declaration? 09:05:53
A. Yes, this is my declaration. **09:06:04**

Q. Okay. And let me also hand to you what was marked as Exhibit 1004. This is your CV. 09:06:07 09:06:09 09:06:09

(Whereupon, Previously Marked Exhibit 1004 is identified for the record.) 09:06:09 09:06:09 09:06:32

BY MR. KUO: 09:06:32

Q. Correct? 09:06:32

A. Yes. **09:06:32**

Q. Okay. I don't want to go through all your background and stuff. 09:06:33 09:06:37

Is there anything -- does Exhibit 1004 accurately reflect your educational, work background? 09:06:38 09:06:43 09:06:45

A. Yeah, at the time I submitted it. **09:06:47**

Q. Is there anything of note to add? 09:06:50

A. I mean, I've done a few more cases. I've testified in a few -- at least one trial since I submitted this. **09:06:52 09:06:55 09:06:57**

Q. Okay. What cases and trials have you testified in since you submitted this? 09:06:59 09:07:05

Oh, and before you answer that question, do you remember when you submitted this, approximately? 09:07:07 09:07:08 09:07:10

A. This was probably in the same **09:07:11**

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date, March -- March 1, 2024. 09:07:14

Q. Okay. Since March of 2024, what additional cases have you worked on? 09:07:16 09:07:20

A. I won't be able to remember them all, but I at least testified in a case involving Nokia and Correct Transmission. 09:07:23 09:07:26 09:07:29

Q. Okay. And what party were you testifying on behalf of? 09:07:36 09:07:41

A. I was testifying on behalf of Nokia, the defendant in a case in the Eastern District of Texas, in Marshall. And that went to trial -- I don't remember -- October-ish. 09:07:42 09:07:43 09:07:46 09:07:50 09:07:53

Q. Did you testify at the trial? 09:07:54

A. Yes. 09:07:56

Q. Was that a jury trial? 09:07:57

A. It was. 09:07:59

Q. Was your testimony in the Nokia trial related to validity? 09:07:59 09:08:13

A. It's hard for me to remember now. I was at least testifying on some noninfringement issues. I don't remember if I testified on validity. I'd have to look. 09:08:15 09:08:27 09:08:31 09:08:37 09:08:41

Q. Okay. Do you remember the jury 09:08:41

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verdict? 09:08:42

A. Yeah. Nokia was found to be not infringing any of the asserted claims, which -- oh, actually, I think Dr. Cole was testifying in that trial as well. 09:08:43 09:08:47 09:08:49 09:08:55

Q. Dr. Who? 09:08:56

A. Eric Cole. 09:08:58

Q. Oh, Cole. Sorry. 09:08:58

A. Yeah. He was testifying for the plaintiff. 09:09:00 09:09:02

Q. Any other cases since March of 2024 that you worked on? 09:09:03 09:09:08

A. Oh, I worked on a number of cases. But I really have to look at my current CV to give you a list. 09:09:11 09:09:14 09:09:17

Q. Have you worked on any additional cases since March of 2024 for -- on behalf of Cisco? 09:09:20 09:09:21 09:09:25

A. It's possible. I'd have to double-check. 09:09:30 09:09:32

Q. In your CV, under the Trials Testimony and Deposition section, it appears based on the case number, and you can correct me if I'm wrong, that the first case that's listed was in 2006. 09:09:47 09:09:51 09:09:55 09:09:57 09:10:00

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Does that sound right, the Verizon vs. Vonage case? 09:10:03 09:10:05

A. That I ever worked on? 09:10:07

Q. No. The one that's listed here, it says 2006. 09:10:09 09:10:11

A. Yeah, that sounds about right. 09:10:13

Q. Okay. 09:10:15

A. Yeah. 09:10:15

Q. But you anticipated my next question. 09:10:16 09:10:18

Did you work on -- does this only go back to 2006 and you actually had more experience prior to that? 09:10:21 09:10:22 09:10:25

A. No. That Verizon vs. Vonage case was actually my first case I ever worked on. 09:10:25 09:10:27 09:10:29

Q. Okay. 09:10:30

A. It went all the way to trial in under a year. 09:10:30 09:10:31

Q. Well, that's Virginia for you. 09:10:33

So looking at this -- looking at your list here, I understand that perhaps there's more after March of this year. By my count, there's some 15 different matters related to Cisco. 09:10:37 09:10:47 09:10:50 09:10:54 09:11:03

And just to clarify, when I say "different matters," for example, there's a -- looking on page 7 of 13, the second bullet point says Cisco vs. Straight Path, and there's two IPR numbers. So I understand that's a single engagement, but there's multiple matters there. 09:11:04 09:11:06 09:11:12 09:11:15 09:11:19 09:11:21 09:11:23

So with that understanding, does it sound right, there's about 15 or so different matters since 2015 that you've worked on for Cisco? 09:11:26 09:11:31 09:11:33 09:11:36

A. I mean, I -- if you want me to count them. I mean, it's probably approximately right. **09:11:40 09:11:42 09:11:44**

Q. Okay. And there may be more since then? 09:11:47 09:11:49

A. There could be. I'd have to double-check. **09:11:49 09:11:51**

Q. I didn't see Fortinet listed on any of these matters, and it may just be because they're not the first named party on the matter. 09:11:54 09:12:00 09:12:02 09:12:05

Have you worked for Fortinet in the past? 09:12:06 09:12:09

A. It could be possible. I don't -- **09:12:09**

I don't remember. I probably didn't work on any case for very long, if I did at all. I just don't remember. 09:12:16 09:12:17 09:12:20

Q. Do you have any idea how many times you've worked for -- been engaged by Winston & Strawn? 09:12:22 09:12:29 09:12:35

A. Yeah. I mean, it's a number of times. Probably less than the 15 or so for Cisco, but it's a fair number, maybe a little less than that, maybe around there. I'd have to check my records. 09:12:38 09:12:43 09:12:46 09:12:52 09:12:54

Q. So I'm sorry. To clarify, so you -- while you've worked for Cisco approximately 15 times since 2015, not all of them were through Winston. Is that what you're saying? 09:12:56 09:12:59 09:13:01 09:13:05 09:13:09

A. That's right, yeah. 09:13:11

Q. Just to clarify. My question wasn't limited to Cisco matters through Winston, it was just Winston in general. 09:13:12 09:13:14 09:13:16

A. Yeah, that's kind of what I understood. But, yes, I've been engaged on matters for other clients through Winston & Strawn as well. 09:13:19 09:13:21 09:13:23 09:13:26

Q. Okay. 09:13:26

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A. Again, I don't remember exactly how many. It's probably a little less than the number of times I've been engaged for Cisco. But, you know, that could be right around there. 09:13:26 09:13:28 09:13:32 09:13:34 09:13:38

Q. Okay. Who are some of the other clients that you worked on through Winston? 09:13:39 09:13:45

A. I think there was a case I did for Comcast. I think some other cable system providers, perhaps. 09:13:48 09:13:52 09:14:00

Q. Yeah, you can take a look at your CV to refresh. 09:14:04 09:14:06

A. Yeah. I think this one on the first page, I don't know, about the sixth -- sixth or seventh from the bottom that says "Comcast," I think that was through Winston. 09:14:24 09:14:25 09:14:28 09:14:30 09:14:32

Q. On which page are you? 09:14:35

A. I'm sorry. Page 6 of 13. 09:14:36

Q. Oh, thank you. 09:14:38

A. And maybe Cox. I don't remember if I was doing Cox with Winston or another law firm. 09:14:40 09:14:41 09:14:44

Q. I'm sorry. Go ahead. 09:14:45

(Pause for reading/reviewing.) 09:16:08

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A. Yeah, I mean, those are the only two that I really recognize offhand, looking through this right now. **09:16:13 09:16:16 09:16:18**

I mean, it could be a number that's much less than the number of times I worked on cases for Cisco. It's just that some of these cases took many, many years, so maybe that's why I think that I was working with them for more cases. **09:16:20 09:16:21 09:16:24 09:16:26 09:16:29 09:16:32**

I think that's all I can tell. I don't remember the details of who -- you know, what law firm I worked with on all these cases. So, I mean, at least I think those two. **09:16:34 09:16:36 09:16:38 09:16:39 09:16:41**

Q. Okay. 09:16:42

A. And I think they did last quite some time. **09:16:43 09:16:45**

Q. Okay. 09:16:46

A. Yeah. **09:16:46**

Q. Thanks. 09:16:46

On the matters for which you worked on behalf of Cisco, can you break down how many times Cisco was the patentee versus the alleged infringer/patent challenger? 09:16:48 09:16:52 09:16:59 09:17:03 09:17:08

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A. Well, probably nearly all the cases that I can remember, you know, thinking about it right now, they were the defendant or petitioner in an IPR. 09:17:09 09:17:17 09:17:21 09:17:23

Q. And I take it in every instance you found that either there was no infringement and/or that the patents were not valid? 09:17:28 09:17:36 09:17:37 09:17:39

A. I'm not sure I worked on infringement in all the federal court cases, but in IPRs, submitting for the petitioner, I mean, I don't remember every IPR, but typically they are submitted on behalf the patentability of the patent. And my conclusion would have been the challenge claims would be not patentable in an IPR proceeding. 09:17:42 09:17:46 09:17:51 09:17:54 09:18:00 09:18:02 09:18:05 09:18:08 09:18:11

Q. Okay. 09:18:12

A. If I -- if I'm submitting for petitioner. 09:18:12 09:18:13

Q. Was there any instance, and when -- in which you were considering being -- working on a matter on behalf of Cisco where you thought the patents were valid? 09:18:14 09:18:17 09:18:20 09:18:30 09:18:35

A. Well, I mean, I have to have -- I have to think through every case, but there are certainly some cases I've worked on, generally speaking, that never got to the stage where I submitted anything in the proceedings. So I just don't remember all my cases and whether that's happened.

But there are certainly cases I've worked on where I -- you know, for patent owner or plaintiff in litigation, generally speaking, where I've rebutted opinions about invalidity and rebutted opinions about unpatentability.

Q. Right. But that's not my question. My question was specific to Cisco.

And if I'm -- if I'm correct in understanding what you just said, you can't think of an instance where you either worked for Cisco or were considering working for Cisco where you found patents to be -- that were being asserted against Cisco to be valid; is that correct?

MR. BORDER: Objection. Form.

THE WITNESS: I don't think I

could say that in any proceeding I've worked on because typically a validity opinion is just, you know, a rebuttal opinion just based on the prior art of record in a case and not -- you know, I wouldn't be able to say that -- a blanket statement that any patent's valid over a small body of prior art submitted. I would rebut the opinions about invalidity or unpatentability if I were working on that side of a case. 09:20:00 09:20:01 09:20:05 09:20:07 09:20:10 09:20:14 09:20:17 09:20:20 09:20:23 09:20:24 09:20:27

BY MR. KUO: 09:20:29

Q. Okay. 09:20:29

A. But I don't think I could say -- I don't think I would ever have an opinion that something is -- is blanket statement like that. **09:20:29 09:20:31 09:20:33 09:20:38**

Q. Let me ask it this way. 09:20:38

Have you ever been presented with an opportunity to work on behalf of Cisco and where -- where the question was whether the patents at issue were valid or not and you opted not to work on the case because you believed the patents to be valid? 09:20:41 09:20:43 09:20:48 09:20:52 09:20:57 09:21:00

MR. BORDER: Objection. Form. 09:21:02

Relevance. 09:21:07
THE WITNESS: I mean, that's 09:21:08
typically not the question I would be 09:21:11
asked about in taking a case. 09:21:13
Again, I could never make a 09:21:19
statement where a patent is valid as a 09:21:21
blanket statement without analyzing, 09:21:26
you know, specific -- well, because, 09:21:30
you know, if I'm looking to take a case 09:21:32
about -- in an IPR, I would be 09:21:37
challenging the patentability. 09:21:42
But if you're asking -- you're 09:21:47
asking about Cisco's patents being 09:21:49
valid? 09:21:50
BY MR. KUO: 09:21:50
Q. Let me see if I can drill down. 09:21:53
So there's a potential matter 09:21:57
that you can work on on behalf of Cisco, 09:22:01
whether it be an IPR or on behalf of Cisco, 09:22:05
who's accused of infringement, and you're 09:22:08
provided with the patents that are at 09:22:13
issue. You're provided with some prior art 09:22:17
that the attorneys have decided should be 09:22:20
applied against those patents. 09:22:23
Have you ever come to the 09:22:26

conclusion that, in fact, the patents are -- that the prior art does not render the patents at issue invalid? 09:22:29 09:22:35 09:22:38

MR. BORDER: Objection. Form. Relevance. 09:22:45 09:22:46

THE WITNESS: I mean, generally speaking, I get cases all the time. I get presented with prior art. And I want to search for more. Sometimes I'm asked to do it on my own. Sometimes I review a larger body of prior art. 09:22:46 09:22:53 09:22:55 09:22:57 09:22:58 09:23:01

There's certainly prior art references that I would consider for -- generally in my matters on IPRs as a petitioner or defendant, you know, reviewing prior art that's been presented to me that I think there's plenty of prior art that -- that I wouldn't use in a proceeding. 09:23:03 09:23:04 09:23:07 09:23:13 09:23:15 09:23:22 09:23:25 09:23:30

So what you see when -- at the petition stage when I submit a declaration would be -- I could have reviewed a lot more prior art, just depending on the case. 09:23:33 09:23:38 09:23:40 09:23:44 09:23:49

///

BY MR. KUO: 09:23:50

Q. Yeah. So my question is specific to Cisco. 09:23:50 09:23:52

Has there ever been an instance were you have been asked to look at the validity of patents that Cisco was having to deal with and come to the conclusion that the patents were, in fact, valid? 09:23:53 09:23:55 09:23:59 09:24:03 09:24:07

MR. BORDER: Objection. Form. Relevance. 09:24:11 09:24:12

THE WITNESS: Again, I don't think I could come to a conclusion, a blanket -- 09:24:15 09:24:17 09:24:19

BY MR. KUO: 09:24:19

Q. I'm not asking for a blanket. I'm asking for Cisco specific. 09:24:19 09:24:21

A. Well, I'm saying even with Cisco-specific matters, and I don't know if you're asking me what I talked to the attorneys about or not, but generally, if I'm presented with prior art, I wouldn't say that it's valid. I wouldn't say that it's valid. **09:24:23 09:24:26 09:24:28 09:24:30 09:24:33 09:24:35 09:24:37**

I would say I don't -- you know, maybe the prior art here I wouldn't use or **09:24:38 09:24:40**

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I don't like them as much. **09:24:42**

Q. Have you ever said that in a Cisco matter? 09:24:43 09:24:45

MR. BORDER: Objection. Form. Relevance. 09:24:45 09:24:46

THE WITNESS: I mean, probably. 09:24:46

BY MR. KUO: 09:24:53

Q. You don't know? 09:24:54

A. Well, I don't have -- I don't remember every prior art reference I've ever looked at for the Cisco cases, but it's quite likely that there are times where I want to look at other -- more prior art. **09:24:55 09:24:58 09:24:59 09:25:03 09:25:06 09:25:10**

Q. Can you think of an instance when that happened? 09:25:10 09:25:11

A. I can't think of specifics, but it happens generally. It does happen in generally all -- many -- many of my cases. **09:25:13 09:25:15 09:25:20**

Q. But you can't think of an instance where it happened in any Cisco matter? 09:25:22 09:25:23 09:25:25

MR. BORDER: Objection. Foundation. Form. Relevance. 09:25:25 09:25:25

THE WITNESS: Again, I can't 09:25:28

remember. This would all happen after the point I'm engaged, so I -- if you're asking me to disclose what I talked to the attorneys about, I don't think I should be doing that. 09:25:31 09:25:35 09:25:38 09:25:39 09:25:41

BY MR. KUO: 09:25:48

Q. Are you not answering because you think it's protected by attorney-client? 09:25:48 09:25:50

A. Well, it sounds like you're asking me for what I talked to the attorneys about. But I'm saying -- 09:25:51 09:25:54 09:25:55

Q. No. My question -- 09:25:57

A. Literally, I don't remember every single prior art I've ever reviewed for every case for Cisco. I couldn't remember that. 09:25:58 09:26:00 09:26:03 09:26:06

Q. That's fine. If you can't remember, that's fine. You made a statement about if my questions were touching on your conversations with counsel, and you said you don't think you should be talking about that. 09:26:06 09:26:08 09:26:11 09:26:17 09:26:20 09:26:22

And so I want to understand, are you not -- do you not remember or are you not telling me because you think it's 09:26:22 09:26:25 09:26:29

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protected by attorney-client? 09:26:31

A. Well, if my attorney here instructs me not to answer, I will not answer. **09:26:32 09:26:34 09:26:36**

Q. Then that's fine. 09:26:36

A. But I just don't remember. But it also sounds like you are asking me about things that I have spoken to attorneys about. **09:26:37 09:26:38 09:26:41 09:26:42**

But, generally speaking, there are plenty of times I look at the prior art and I would want to use something different or better. **09:26:43 09:26:44 09:26:47 09:26:49**

Q. Okay. So specific to Cisco, is it correct that as you sit here today, you cannot think of an instance where you said, the art that's been presented to me isn't good enough, we need to look for more? 09:26:50 09:26:55 09:27:00 09:27:03 09:27:06

MR. BORDER: Objection. Foundation. Form. Relevance. 09:27:08 09:27:08

THE WITNESS: It's quite possible that that has happened, but I can't remember a specific instance. 09:27:11 09:27:12 09:27:15

BY MR. KUO: 09:27:16

Q. Could you pull out your 09:27:35

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declaration, please? And this is 09:27:37
Exhibit 1003. And go to paragraph 36. 09:27:42
It's on page 21, if that helps. 09:28:01
A. Okay. **09:28:04**
Q. This is a section, it's Roman 09:28:04
numeral VI, Claim Instruction. Go ahead 09:28:07
and read it to yourself if you just need to 09:28:18
kind of refresh yourself. 09:28:21
(Pause for reading/reviewing.) 09:28:24
A. Okay. **09:28:30**
Q. Is it fair to say that your 09:28:32
paragraph 36 is laying out the standard for 09:28:37
claim construction? 09:28:45
A. That's my understanding of it. **09:28:48**
Q. Okay. 09:28:51
A. It is. **09:28:51**
Q. And -- but you've not offered any 09:28:52
claim constructions here? 09:28:58
A. I believe that's correct. I **09:29:00**
understand that there -- patent owner has **09:29:04**
proposed a construction in one of these **09:29:07**
cases, but I was not in -- in this **09:29:10**
declaration, I don't think. **09:29:14**
Q. Okay. 09:29:17
A. I think that's right. **09:29:17**

Q. And so is it fair to say, then, that you proceeded -- oh, I'm sorry. Strike that. 09:29:18 09:29:22 09:29:29

The meaning of the words in the claims that you used were then their ordinary and custom meanings as would be understood by a POSITA; is that right? 09:29:31 09:29:33 09:29:36 09:29:38

A. At the time of the invention. **09:29:40**

Q. Okay. And that was actually my question, about the timing of it. 09:29:43 09:29:46

So at the time of the invention, you viewed the claims as a POSITA would understand the terms according to their ordinary and customary meaning; is that correct? 09:29:48 09:29:51 09:29:54 09:29:55 09:29:59

A. Yeah, at the -- at the time, at the priority date. I understand there's an issue about that as well, but I've laid out what I've laid out in my declaration. **09:29:59 09:30:01 09:30:04 09:30:06**

Q. I'm going to hand to you what's been marked as Exhibit 1001. This is -- this is the '460 patent. 09:30:08 09:30:22 09:30:26

(Whereupon, Previously Marked Exhibit 1001 is identified for the record.) 09:30:29 09:30:29 09:30:29

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THE WITNESS: Thank you. 09:30:29

BY MR. KUO: 09:30:36

Q. Could you turn to claim -- let's just turn to the claims. It's on page 20 of 21. 09:30:37 09:30:42 09:30:45

A. Okay. **09:30:57**

Q. So I want to get an understanding of what you understand the ordinary and customary meaning is at the time of the invention of several of the terms here. 09:30:57 09:30:58 09:31:05 09:31:08

What is a network? 09:31:12

A. Well, I think a network would include examples that are kind of given in the patent itself. And then I've mapped them to items in the prior art that a POSITA would recognize are encompassed by -- by the word "network" in its names. **09:32:02 09:32:03 09:32:05 09:32:08 09:32:09 09:32:14**

Q. I understand that the examples of networks are given in the patent, but I want to understand, what is your definition, as a POSITA, of a network. 09:32:18 09:32:21 09:32:23 09:32:24

A. Well, I considered the plain and ordinary meaning of the claim terms, and I looked at examples given in the patent and I found examples in the prior art, for **09:32:30 09:32:33 09:32:37 09:32:39**

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example, in Krantz, that a POSITA would have recognized would fall within the claim scope of network. 09:32:42 09:32:46 09:32:48

Q. Okay. 09:32:49

A. That's -- that's how I did it. I didn't -- if you're asking for express boundaries on that, that was not necessary because the networks that were in the prior art were pretty clearly well within any potential boundaries. And I didn't understand there was a dispute about what the word "network" meant. 09:32:49 09:32:52 09:32:55 09:32:57 09:32:59 09:33:03 09:33:05 09:33:08

Q. I'm not saying there was a dispute. I'm just asking for your definition of network. 09:33:10 09:33:11 09:33:12

A. Yeah. And so in my analysis, I found examples of networks in the prior art and I wrote about them in my declaration. 09:33:14 09:33:16 09:33:18

Q. So are the examples limiting to what a network is? 09:33:20 09:33:25

A. Examples aren't typically limiting. 09:33:26 09:33:28

Q. So what is a network? 09:33:29

A. So a network includes the examples that I've given in my declaration. 09:33:30 09:33:32

That's the analysis I did with respect to my IPR declaration. 09:33:34 09:33:36

Q. So you can't tell me as you sit here today, you can't give me a definition for network, other than it includes what's in the prior art? 09:33:36 09:33:39 09:33:41 09:33:43

MR. BORDER: Objection. Foundation. Form. 09:33:44 09:33:44

THE WITNESS: I wasn't construing the word "network." I was looking at the term "network" and how a person of ordinary skill understood it in light of the specification at the time of the invention, and I concluded that there were plenty of networks, that the networks disclosed in the prior art were just like the networks disclosed in the patent and how a person of ordinary skill would have understood it. 09:33:45 09:33:47 09:33:50 09:33:53 09:33:55 09:33:58 09:34:00 09:34:04 09:34:05 09:34:06 09:34:13 09:34:13

BY MR. KUO: 09:34:13

Q. Can you tell me today, can you give me today a definition for network? 09:34:14 09:34:16

MR. BORDER: Objection. Form. Outside the scope. 09:34:17 09:34:18

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THE WITNESS: My analysis, I wasn't construing the term "network." 09:34:19 09:34:20

BY MR. KUO: 09:34:20

Q. And -- 09:34:20

A. You didn't give me any exact boundaries. And any boundaries would typically only be about issues there were disputes about. 09:34:24 09:34:25 09:34:28 09:34:30

I reviewed the patent. I reviewed -- looked at examples of networks given in the patent. I looked at the prior art, particular, I think, Krantz. We can go look at that. 09:34:32 09:34:35 09:34:38 09:34:40 09:34:43

I found examples of things that a person of ordinary skill would clearly understand to be covered by the network as used in -- in the claim. 09:34:44 09:34:47 09:34:49 09:34:52

BY MR. KUO: 09:34:52

Q. Dr. Houh, I understand how you conducted your analysis, and you've explained that very well. 09:34:53 09:34:54 09:34:57

Can you, as we sit here today, give me a definition for the ordinary and customary meaning at the time of the invention to a POSITA of "network"? 09:34:59 09:35:04 09:35:07 09:35:09

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MR. BORDER: Objection. Outside the scope of his expert report. 09:35:13 09:35:15

THE WITNESS: Yeah, I've not offered an express construction as to what you're asking in my declaration. 09:35:15 09:35:16 09:35:20

What I did for my declaration was I looked at how a person of ordinary skill would understand the claim terms used in the patent and the claims and challenge claims in the patent, and I looked at examples of networks that were shown in the '460 patent. 09:35:21 09:35:23 09:35:26 09:35:28 09:35:32 09:35:37 09:35:39

I found similar examples that a person of ordinary skill would understand would be encompassed by the claim term "network" as -- as they would understand at the time of invention. And that's the analysis I did. 09:35:46 09:35:48 09:35:50 09:35:52 09:35:55 09:35:56 09:35:57

BY MR. KUO: 09:35:57

Q. Dr. Houh, do you believe that at the time of the invention, that there was an ordinary and customary meaning for the word "network"? 09:35:58 09:36:00 09:36:01 09:36:03

A. Well, I applied the plain and **09:36:07**

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ordinary meaning of the term "network" as understood by a POSITA at the time of the invention. 09:36:10 09:36:12 09:36:13

Q. And what is that meaning? 09:36:13

MR. BORDER: Objection. Outside the scope. 09:36:15 09:36:15

THE WITNESS: And what I offered was I showed examples within Krantz of networks as would have been understood by a POSITA at the time. And that's -- that's what I did. 09:36:15 09:36:18 09:36:22 09:36:24 09:36:25

And if you're challenging -- if you're asking me right now if -- you're challenging or your expert's gonna challenge network, then there might be some dispute about what network encompasses. 09:36:26 09:36:29 09:36:31 09:36:33 09:36:34 09:36:35

But I don't understand that there was any challenge to that in -- so far, and what I did for my analysis was I provided examples from the prior art that I analyzed that a person of ordinary skill -- and I showed, I laid out in my declaration what the network of the prior art that I analyzed was 09:36:37 09:36:40 09:36:46 09:36:48 09:36:51 09:36:55 09:36:56 09:36:59

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and wrote up in the petition. We can go look at that section in the -- my declaration if you'd like. 09:37:02 09:37:04 09:37:06

BY MR. KUO: 09:37:06

Q. Dr. Houh, you've laid out what you actually did, and I understand that. And you don't need to tell me again because that's not what I'm asking you. 09:37:07 09:37:09 09:37:12 09:37:15

I asked -- let's break it down. Back at the time of the invention, was there an ordinary and customary meaning to POSITAs for the word "network"? 09:37:16 09:37:24 09:37:27 09:37:32

A. So I think if you look at the '460 specification, I don't think it talks about a network in a vastly different way than a person of ordinary skill would have understood it. 09:37:36 09:37:38 09:37:40 09:37:43 09:37:46

And so what I did in my analysis was I looked at the prior art and I found examples of -- and I showed what I mapped to a network from the prior art, and that's what I did for my declaration. 09:37:47 09:37:49 09:37:50 09:37:55 09:37:57

I did not expressly offer -- I did not construe network in terms of here's what the meaning is and here's where the 09:37:59 09:38:07 09:38:10

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exact boundaries are. **09:38:12**

Q. I understand you didn't. I'm asking you to do so now. And if you can't, that's fine. 09:38:13 09:38:15 09:38:17

A. It's not that I can't. **09:38:18**

MR. BORDER: Objection. Outside the scope. 09:38:19 09:38:20

THE WITNESS: It's not that I can't do so if there were a dispute about the term "network." 09:38:20 09:38:21 09:38:22

BY MR. KUO: 09:38:24

Q. Then please do so. 09:38:24

A. I did not offer that in my declaration. **09:38:25 09:38:27**

Q. Please offer one now. 09:38:27

MR. BORDER: Objection. Outside the scope of his expert report. 09:38:29 09:38:30

THE WITNESS: I would have to take time in the context, and I'm not going to do that now on the fly. 09:38:31 09:38:33 09:38:36

What I did do for my declaration, which I spent some time on, was giving examples and showing in the prior art of record for this declaration in this case where the networks were. 09:38:38 09:38:40 09:38:43 09:38:45 09:38:49

And you want to look at that, we can look at that. If you think that's not a network, you can ask me questions about what I did write up in my declaration. 09:38:53 09:38:55 09:38:57 09:38:59 09:39:00

BY MR. KUO: 09:39:00

Q. I'm going to ask you what I'm going to ask you. 09:39:00 09:39:01

And my question is -- and if you're not -- you're not willing to do it, that's your answer. 09:39:02 09:39:03 09:39:06

Can you give me a definition for "network" as would be understood to be the ordinary and customary understanding of network at the time of the invention by a POSITA? 09:39:08 09:39:13 09:39:16 09:39:18 09:39:20

MR. BORDER: Objection. Outside the scope of his expert report. 09:39:20 09:39:21

THE WITNESS: So I understand this is a cross-examination about my -- what I've written in my declaration. I've not offered that opinion in my declaration. I'm not going to do it on the fly. I'm here to testify about my declaration. 09:39:22 09:39:23 09:39:25 09:39:28 09:39:29 09:39:32 09:39:34

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BY MR. KUO: 09:39:35

Q. Okay. Looking at Claim 1 again, 09:39:44
there's a term of -- looking at the 09:39:47
preamble, it says, "A method of granting 09:39:51
access to a protected network." 09:39:54
Do you see that? It's in the 09:39:55
'460 patent. 09:39:58

A. Yes, I see that. **09:40:11**

Q. What's a protected network in 09:40:11
contrast to just a network? 09:40:15

A. So if you look at Column 6 in the '460 patent, line 5, it says, "In various embodiments" -- **09:40:52 09:40:55 09:41:00**

Q. I'm sorry. Hang on one second. 09:41:00
I'm sorry. Column 6? 09:41:05

A. Line 5. **09:41:06**

Q. Yes. 09:41:08

A. It says -- the patent specification says, "In various embodiments, protected network 200 includes a corporate network, telephone network, private network, local area network, wide area network, wireless network, communication network, government network, university network and/or the like." **09:41:09 09:41:12 09:41:40 09:41:16 09:41:17 09:41:20 09:41:22 09:41:25**

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So those are some examples that the patent specification gives as to what protected networks are in various embodiments. 09:41:27 09:41:30 09:41:34 09:41:40

Q. Okay. And how is a protected network different from just network? 09:41:37 09:41:39

A. Are you asking me about something that I said in my declaration? 09:41:55 09:42:05

Q. No. I'm asking you a question. 09:42:06

MR. BORDER: Objection. Outside the scope. 09:42:08 09:42:10

THE WITNESS: If you can show me something and ask me about something in my declaration, I'd be happy to talk about it. 09:42:10 09:42:12 09:42:15 09:42:16

But what the patent specification simply says is that in various embodiments, protected network 200 includes a corporate network, telephone network, private network, local area network, wide area network, wireless network, communication network, government network, university network, and or the like. 09:42:17 09:42:19 09:42:20 09:42:23 09:42:25 09:42:27 09:42:30 09:42:31 09:42:33

So I think a person of ordinary 09:42:35

skill would understand that these are examples given of what the '460 patent calls protected network. 09:42:37 09:42:39 09:42:42

BY MR. KUO: 09:42:45

Q. So are you unable as we sit here today to explain to me how a POSITA would differentiate what's described as a protected network versus just a network in general? 09:42:48 09:42:50 09:42:58 09:43:00 09:43:03

MR. BORDER: Objection. Form. Foundation. 09:43:03 09:43:04

THE WITNESS: Again, if you think there's somewhere in the '460 patent where the specification talks about that, I'd be happy to look at it. 09:43:07 09:43:08 09:43:10 09:43:12

BY MR. KUO: 09:43:13

Q. I'm just asking -- 09:43:14

A. What I'm pointing you to is the part of the specification that gives some pretty clear examples of what's included when the patentee talks about protected networks. **09:43:14 09:43:16 09:43:19 09:43:22 09:43:24**

Q. So you're not going to answer my question? 09:43:27 09:43:35

MR. BORDER: Objection. Form. 09:43:35

Foundation. 09:43:36
THE WITNESS: If it's -- if you'd 09:43:36
like me to look at some statement I 09:43:38
made about the difference in my 09:43:39
declaration, I'd be happy to look at 09:43:41
it. 09:43:42
BY MR. KUO: 09:43:42
Q. I'm asking you a question. 09:43:43
As we sit here today, and if you 09:43:44
can't give me an answer, that's fine, but 09:43:46
what is a difference between a network in 09:43:50
general and a protected network? 09:43:54
A. Well, the patent specification 09:43:57
gives some clear examples in various 09:43:59
embodiments of what protected networks are, 09:44:01
and they include a corporate network, 09:44:03
telephone network, private network, local 09:44:05
area network, wide area network, wireless 09:44:07
network, communication network, government 09:44:10
network, university network, and/or the 09:44:12
like. 09:44:14
That's an example. And different 09:44:14
embodiments of what the patent spec says 09:44:17
are protected networks. And I don't -- if 09:44:20
you think I address that difference in my 09:44:24

declaration, I'm happy to look at it, but I don't think I -- I don't remember doing so. 09:44:26 09:44:29

Q. Can you answer my question or not? 09:44:31 09:44:36

MR. BORDER: Objection. Form. 09:44:38

THE WITNESS: You'd have to give me some context and I'd have to spend some time thinking about it if you really wanted the difference. 09:44:39 09:44:40 09:44:42 09:44:44

But it's protected network -- the patent specification gives the clear examples of what in various embodiments protected networks are. 09:44:47 09:44:51 09:44:52 09:44:54

And I found in the prior art similar examples in the prior art of what falls under the scope of protected network as described in the context of the specification at the time of the invention of the '460 patent, and so that's the analysis I did. 09:44:55 09:44:58 09:45:02 09:45:04 09:45:08 09:45:09 09:45:15

The patent gave some examples of these protected networks, and I found similar examples in the prior art that a person of ordinary skill would clearly understand fall within the 09:45:16 09:45:18 09:45:21 09:45:23 09:45:27

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meaning of protected network as laid out in the '460 specification. 09:45:29 09:45:31

BY MR. KUO: 09:45:33

Q. Dr. Houh, let me see if you can answer this question. 09:45:34 09:45:35

As you sit here today, in your mind is there a difference between a network in general and a protected network? 09:45:36 09:45:42 09:45:45

MR. BORDER: Objection. Form. Outside the scope. 09:45:50 09:45:51

THE WITNESS: That's not the analysis I did. And I would not do that on the fly, based on the fact that in my declaration I found examples of the protected networks and I laid out how the prior art disclosed protected networks. And we can look at that in my declaration. 09:45:54 09:45:54 09:45:56 09:46:00 09:46:03 09:46:08 09:46:10 09:46:12

But the question you asked is different than the analysis I did. 09:46:13 09:46:14

BY MR. KUO: 09:46:15

Q. I understand it's different than the analysis you did, but I want an answer to that question. 09:46:16 09:46:18 09:46:20

Can you tell me, as you sit here 09:46:20

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today, the difference between a protected network and a network? 09:46:22 09:46:24

MR. BORDER: Objection. Outside the scope. 09:46:26 09:46:31

THE WITNESS: Again, I'm not gonna -- I'm not gonna come up with on-the-fly opinions about things like this to the extent I didn't already talk about them in my declaration. 09:46:31 09:46:32 09:46:34 09:46:37 09:46:39

BY MR. KUO: 09:46:41

Q. So you can't or you won't? 09:46:41

MR. BORDER: Objection. Form. 09:46:43

THE WITNESS: Given the time and the context and issue that is under dispute, I would potentially look at it, but I don't understand if that there's any dispute now. 09:46:44 09:46:46 09:46:48 09:46:50 09:46:52

And maybe it will arise later in a patent owner response or whatever about how the prior art that I've laid out somehow doesn't disclose protected network. But I gave examples of the network in Krantz, and it's a protected network. And I discuss that in my declaration. 09:46:54 09:46:56 09:46:59 09:47:04 09:47:06 09:47:09 09:47:12 09:47:14

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BY MR. KUO: 09:47:14

Q. Dr. Houh, this is our opportunity to take your deposition and find out your views on things, and you're saying that if a dispute comes up later, that perhaps you'll think about it. 09:47:15 09:47:17 09:47:19 09:47:21 09:47:24

But I'm asking you right now, can you, as opposed to are you willing to, can you give me -- explain to me the difference between a network in general versus a protected network? 09:47:25 09:47:31 09:47:35 09:47:38 09:47:41

MR. BORDER: Objection. Outside the scope. 09:47:43 09:47:44

THE WITNESS: So if I'm later asked to write a supplemental declaration rebutting some -- some opinion about how the prior art does not disclose protected network, then I understand if I submit another declaration, you'll have a chance to depose me again on my supplemental declaration. 09:47:44 09:47:45 09:47:47 09:47:51 09:47:55 09:47:59 09:48:00 09:48:01 09:48:04

But I don't have opinions in here about exactly what you're asking. I understand this is a cross-examination 09:48:04 09:48:06 09:48:08

of -- based on my testimony in my declaration, and I'm not going to, without understanding what the dispute is, talk about something I've not been asked to talk about in my declaration already. 09:48:11 09:48:14 09:48:23 09:48:25 09:48:29 09:48:31

BY MR. KUO: 09:48:31

Q. I'm just asking you the definition, the ordinary and customary meaning of a claim term, claims that you have analyzed and that you have said in your declaration that you applied the ordinary and customary meaning. 09:48:32 09:48:33 09:48:39 09:48:41 09:48:43 09:48:46

What is the meaning of a protected network as opposed to a network? And you're -- am I correct that you are unwilling to explain that to me as you sit here today? 09:48:49 09:48:50 09:48:57 09:48:59 09:49:04

MR. BORDER: Objection. Form. Outside the scope. 09:49:04 09:49:05

THE WITNESS: No. I think I've explained it to you perfectly clearly, which is the patent itself gives examples. 09:49:05 09:49:06 09:49:08 09:49:10

It says right here, "In various 09:49:12

embodiments protected network 200 includes," and it gives a list of things. 09:49:15 09:49:17 09:49:18

BY MR. KUO: 09:49:18

Q. Is that -- is that -- 09:49:19

A. Excuse me. **09:49:19**

Q. Is the list of things -- 09:49:20

A. I'm not done. **09:49:21**

Q. Is the list of things here -- 09:49:22

A. If you would let me finish, please, my answer. **09:49:24 09:49:25**

Q. Sure. Because you're just going to read -- you're just going to read the same part of the patent that you did before, but go ahead. 09:49:26 09:49:28 09:49:29 09:49:30

A. Well, I'm going to say the same thing because you're asking me the same question. **09:49:30 09:49:32 09:49:32**

Okay. So -- **09:49:34**

Q. You're not answering any of my questions. 09:49:34 09:49:35

A. I'm answering them to tell you what my analysis that I did for my declaration was. So if you would let me finish, please. **09:49:35 09:49:37 09:49:40 09:49:41**

Q. Sure. Go ahead. 09:49:42

A. And one of the ground rules, I understand, I won't interrupt your question if you don't interrupt my answer. **09:49:42 09:49:43 09:49:44**

Q. Okay. Go ahead. 09:49:46

A. Okay. So the analysis I did as a person -- looking at it from the perspective of a person of ordinary skill, I was looking at the prior art -- **09:49:47 09:49:50 09:49:52 09:49:55**

Q. Uh-huh. 09:49:56

A. -- for example, Krantz, and does Krantz disclose a protected network. **09:49:56 09:49:58**

So I looked at Krantz, and I looked at examples of protected network that the patent specification itself gives, and I found that networks in Krantz fell clearly within the scope of the examples of the networks -- protected network laid out -- examples of the protected network laid out in the '460 patent. **09:50:00 09:50:02 09:50:05 09:50:10 09:50:13 09:50:17 09:50:20 09:50:22**

So that's pretty clear. That's the analysis I did. You're asking for something that's different than what I did. **09:50:24 09:50:26 09:50:28**

Because to a person of ordinary skill in the art, they look at the **09:50:32 09:50:34**

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specification, they say, oh, here's some examples of protected networks. 09:50:35 09:50:37

I look in Krantz. I found similar examples of those protected networks. And so that's what I mapped to a protected network. So that's the analysis I did. 09:50:38 09:50:41 09:50:43 09:50:47 09:50:49

Q. So the examples that are given in the '460 patent, is that the scope of what a protected network is? 09:51:06 09:51:08 09:51:16

A. Those are examples that fall within the scope of what a protected network as laid out and as a person of ordinary skill reviewing the specification of the '460 would understand falls within the scope. 09:51:17 09:51:19 09:51:23 09:51:27 09:51:28 09:51:30

Q. So what are the hallmarks of a protected network as compared to a regular network? 09:51:30 09:51:32 09:51:34

MR. BORDER: Objection. 09:51:34

BY MR. KUO: 09:51:35

Q. I'm sorry. A network in general? 09:51:35

MR. BORDER: Objection. Form. 09:51:37

Outside the scope. 09:51:37

THE WITNESS: I didn't use the 09:51:41

word "hallmark" in my declaration, but what I -- 09:51:42 09:51:44

BY MR. KUO: 09:51:44

Q. I know. That's a term I used. 09:51:45

A. Yes. So the network in Krantz is a protected network as would be understood by a person of ordinary skill in the art. **09:51:46 09:51:54 09:51:58**

Q. What makes a network a protected network? 09:51:59 09:52:04

A. If it was one of the examples given of protected networks in the specification, then it would fall within the scope of protected network as used in the patent. **09:52:05 09:52:07 09:52:11 09:52:12 09:52:15**

Q. Yeah. So all these examples that you've read into the record numerous times, what do they all have in common to make them protected networks? 09:52:15 09:52:17 09:52:22 09:52:24

A. Because they're examples given of what a protected network is in the specification itself. And the specification lays out these examples. **09:52:26 09:52:32 09:52:33 09:52:35**

They're not limiting. They don't limit the scope of a protected network. But the things listed here would be **09:52:36 09:52:38 09:52:40**

understood by a POSITA as being a protected network as used by the '460 patent. 09:52:41 09:52:44

Q. I'm going to read this question again, because you're not answering my question. 09:52:46 09:52:49 09:52:51

The examples that you've read into the record numerous times from the patent, what did they have in common to make them protected networks? 09:52:51 09:52:53 09:52:54 09:52:56

A. What they have in common is that they're all listed in the specification as examples of protected networks. 09:52:58 09:53:02 09:53:04

Q. That's it? The fact that it's listed in the specification as being protected networks, that's what makes them a protected network? 09:53:05 09:53:07 09:53:08 09:53:10

MR. BORDER: Objection. Form. 09:53:10

THE WITNESS: That's what they have in common. That's what the specification says are examples of protected networks in various embodiments. 09:53:11 09:53:12 09:53:14 09:53:15 09:53:17

BY MR. KUO: 09:53:18

Q. Do you understand how these different networks work, the corporate 09:53:18 09:53:19

network, telephone network, private network, et cetera? Do you understand how they work? 09:53:22 09:53:24 09:53:26

MR. BORDER: Objection. Form. Outside the scope. 09:53:26 09:53:26

THE WITNESS: In what manner are you talking about? 09:53:27 09:53:28

BY MR. KUO: 09:53:28

Q. In the manner of your analysis to say that those are protected networks. 09:53:29 09:53:31

A. The manner of my analysis was to say for Krantz these are -- Krantz discloses a network that's similar to exactly what the '460 patent talks about as a protected network. **09:53:34 09:53:35 09:53:39 09:53:40 09:53:43**

Q. Dr. Houh, can you tell me what makes a network a protected network? Yes or no? 09:53:44 09:53:46 09:53:49

MR. BORDER: Objection. Form. 09:53:50

THE WITNESS: A protected network as used in the patent would encompass the examples that are laid out in the specification, and that's what a person of ordinary skill would understand would fall within the scope if they are 09:53:51 09:53:53 09:53:56 09:53:58 09:54:01 09:54:02

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the same or similar -- same, certainly, as what's explicitly listed and laid out in the '460 patent specification as examples of protected network. 09:54:04 09:54:08 09:54:12 09:54:14

BY MR. KUO: 09:54:16

Q. And the Internet's not given as an example of a protected network, correct? In the section that you've read? You should know it by heart by now. 09:54:16 09:54:19 09:54:21 09:54:23

A. Oh, I don't have a photographic memory, so -- **09:54:25 09:54:27**

Q. Well, you've read it about 10 times already today. 09:54:27 09:54:29

MR. BORDER: Objection. Form. 09:54:29

THE WITNESS: Well, I read it in response to the same question. But I don't see the word "Internet" in Column 6, lines 5 through 10. 09:54:30 09:54:33 09:54:34 09:54:37

BY MR. KUO: 09:54:39

Q. Would you consider Internet to be a protected network? 09:54:39 09:54:41

A. I can't -- I don't recall using the mapping of Internet as protected network in my analysis, but we can look at that if you -- if you want to point me to a **09:54:43 09:54:50 09:54:53 09:54:55**

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particular spot. **09:54:56**

Q. No. You can answer my question. 09:54:58

Would you consider the Internet 09:55:00

to be a protected network? 09:55:02

MR. BORDER: Objection. Form. 09:55:02

Outside the scope. 09:55:04

THE WITNESS: What I consider to 09:55:04

be protected networks are examples laid 09:55:06

out in the '460 patent of what a -- 09:55:07

protected network examples were given. 09:55:09

And in my analysis I showed where those 09:55:11

protected networks were mapped to in 09:55:13

the prior art, such as Krantz. 09:55:19

BY MR. KUO: 09:55:19

Q. And Internet is not one of the 09:55:20

networks that are listed, correct, in the 09:55:22

'460? 09:55:25

A. Well, at least in the section **09:55:26**

Column 6, lines 5 through 10, I didn't see **09:55:28**

the word "Internet." **09:55:31**

Q. Okay. Anywhere else in the '460 09:55:34

that make -- may lead you to the conclusion 09:55:36

that the Internet is considered a protected 09:55:38

network? 09:55:40

A. Do you want me to spend time **09:55:43**

reviewing the '460 patent to answer that? 09:55:44

Q. If you need to. 09:55:46

A. Again, I don't remember these words from memory. If you want to point me somewhere where it uses the word "Internet," I'll be happy to take a look. 09:55:48 09:55:49 09:55:51 09:55:54

Q. I'm here asking about your testimony. If you don't recall, that's fine. 09:55:55 09:55:58 09:56:00

A. I don't have this memorized, and I certainly couldn't recall, like, where every word, such as the word "Internet," is used in the '460 patent. 09:56:00 09:56:02 09:56:04 09:56:06

But at least in Column 6, 5 through 10, did not use the word "Internet." But I also did not -- in my analysis, for example, in paragraph 67 of my report, I didn't map it to Internet there with respect to what a protected network of Krantz was. 09:56:07 09:56:10 09:56:12 09:56:14 09:56:16 09:56:20 09:56:22

Q. I'm really just asking you whether you considered the Internet to be a protected network or not. And if you can't answer that question, so be it. 09:56:23 09:56:25 09:56:31 09:56:33

Can you answer that question? Do 09:56:36

you consider the Internet to be a protected network? 09:56:39 09:56:42

MR. BORDER: Objection. Form. Outside the scope. 09:56:42 09:56:43

THE WITNESS: That's not my mapping. That's not part of my analysis for what I did for analyzing Claim 1 with respect to at least Krantz. I don't see that here in this section. 09:56:44 09:56:45 09:56:47 09:56:49 09:56:51 09:56:53

I can look at the other portions of my declaration, but if I didn't -- I don't believe I offered that as an opinion in my declaration, that I mapped protected network to Internet. 09:56:53 09:56:57 09:57:02 09:57:03 09:57:04

But, again, I don't remember every word in my report. But based on what I'm looking at here on page 36 and 37, I don't see that. 09:57:05 09:57:06 09:57:09 09:57:12

BY MR. KUO: 09:57:15

Q. Whether you mapped it or not is not my question. 09:57:15 09:57:17

My question is: Do you consider the Internet to be a protected network, yes or no? 09:57:18 09:57:25 09:57:30

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MR. BORDER: Objection. Outside the scope. 09:57:30 09:57:31

THE WITNESS: If you think I offer that opinion somewhere, I would be happy to take a look at it in my declaration. 09:57:31 09:57:34 09:57:35 09:57:37

BY MR. KUO: 09:57:37

Q. I'm asking you the question. 09:57:38

A. I don't remember -- I don't remember every word of my declaration, but I do not recall, sitting here, that I did offer that opinion. **09:57:39 09:57:40 09:57:41 09:57:43**

Q. I'm asking you that question right now. 09:57:44 09:57:46

As we sit here today, do you consider -- and your counsel has made the objection about it being outside the scope of the report, but I'm asking you the question. 09:57:47 09:57:49 09:57:51 09:57:53 09:57:56

Do you consider the Internet to be a protected network or not? 09:57:56 09:57:58

MR. BORDER: Objection. Outside the scope. 09:58:01 09:58:02

THE WITNESS: If there's some prior art you want me to look at with 09:58:02 09:58:03

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respect to patentability to analyze it, I might be able to analyze that part. But I would need some time and I would need the exact context and whether or not, for example, if a piece of prior art only discusses the Internet or if it discusses other things. 09:58:05 09:58:08 09:58:10 09:58:12 09:58:16 09:58:18 09:58:20

So without -- absent any context of any specifics or any specific reference, I'm not -- I did not do that for Krantz at least, because Krantz offers -- I mapped Krantz. I did not map it to the Internet, at least for what a protected network was. 09:58:21 09:58:26 09:58:29 09:58:31 09:58:39 09:58:42 09:58:44

BY MR. KUO: 09:58:47

Q. Dr. Houh, I understand what you did and did not do. Can you tell me as we sit here today whether you considered the Internet to be a protected network or not? 09:58:57 09:58:58 09:59:05 09:59:09

MR. BORDER: Objection. Outside the scope. 09:59:14 09:59:15

THE WITNESS: I didn't have to do that with respect to Krantz because Krantz disclosed networks that fall within the examples of the '460 patent 09:59:15 09:59:16 09:59:18 09:59:20

gave as examples of protected networks in the various embodiments. 09:59:23 09:59:26

BY MR. KUO: 09:59:27

Q. Dr. Houh, I'm not asking you with respect to Krantz, and I'm not asking with respect to your analysis that's in your declaration. 09:59:28 09:59:30 09:59:32 09:59:35

I'm asking you, as you sit here today, do you consider the Internet to be a protected network or not? If you can't answer it, just tell me that. 09:59:35 09:59:37 09:59:40 09:59:41

MR. BORDER: Objection. Outside the scope. 09:59:43 09:59:45

THE WITNESS: It's not that I couldn't eventually, but it's not something I considered with respect to my analysis, at least for Krantz, so it's not an issue that I previously looked at in detail. 09:59:45 09:59:46 09:59:48 09:59:49 09:59:51 09:59:55

But, again, I don't have any context -- any more context to your question than what you're asking. 09:59:57 10:00:00 10:00:02

BY MR. KUO: 10:00:05

Q. So you're not able to answer my question? 10:00:05 10:00:07

MR. BORDER: Objection. Foundation. Form. Outside the scope. 10:00:07
THE WITNESS: I didn't say I wasn't able to. It's that I haven't offered that yet, and any -- any opinions about that, I would need to take some time to analyze. 10:00:08 10:00:09 10:00:11 10:00:13 10:00:14
BY MR. KUO: 10:00:16
Q. I'm sorry. Let me rephrase. 10:00:17
So you're not able to, as we sit here today, answer my question? 10:00:18 10:00:20
MR. BORDER: Objection. Form. Foundation. 10:00:21 10:00:22
THE WITNESS: It depends how much time and what context you want to do that in. But I haven't offered an opinion about that, at least for Krantz, that I can recall, unless you want to show me something where I talked about that in my declaration, and I'd be happy to look at it. 10:00:23 10:00:25 10:00:27 10:00:30 10:00:31 10:00:34 10:00:36 10:00:38
BY MR. KUO: 10:00:40
Q. Can you give me a definition of what the Internet is? 10:00:40 10:00:41
MR. BORDER: Objection. Outside 10:00:42

the scope. 10:00:43
THE WITNESS: I haven't offered 10:00:43
any express construction of the word 10:00:44
"Internet," and I don't think that 10:00:46
appears in the claims. 10:00:47
BY MR. KUO: 10:00:49
Q. Can you give me a definition of 10:00:49
what the Internet is? 10:00:50
MR. BORDER: Objection. Outside 10:00:51
the scope. 10:00:56
THE WITNESS: I don't think I 10:00:56
testified to that or wrote anything 10:00:58
about that in my declaration, and I 10:00:59
don't even think that's used in any of 10:01:01
the claims, at least not that I can 10:01:04
remember. Maybe it is, if you want to 10:01:05
show me. 10:01:07
BY MR. KUO: 10:01:07
Q. That's not my question. 10:01:08
My question is: Can you give me 10:01:08
a definition for what the Internet is? 10:01:10
MR. BORDER: Joe, all of these 10:01:12
questions are outside the scope of his 10:01:13
report. This is cross-examination. 10:01:15
It's limited to the scope of the direct 10:01:16

examination. 10:01:18
If you want to call the board and 10:01:18
if you want to continue on these line 10:01:20
of questioning that it is outside the 10:01:21
scope, you can do that. He's told you 10:01:23
he doesn't have an opinion on it. It's 10:01:26
not in his report. If it is, you 10:01:27
should show him. 10:01:30
MR. KUO: He hasn't told -- he 10:01:30
hasn't told me anything except for what 10:01:31
he's done in his report. 10:01:34
I'm asking a question. If he 10:01:35
can't answer as we sit here, that's 10:01:36
fine. That's his answer. 10:01:37
MR. BORDER: He's given you an 10:01:38
answer. 10:01:40
MR. KUO: He has not. 10:01:40
BY MR. KUO: 10:01:41
Q. Can you give me, as we sit here 10:01:41
right now, based on the information in 10:01:44
front of us, give me a definition of the 10:01:46
Internet? 10:01:48
MR. BORDER: Objection. Outside 10:01:49
the scope. 10:01:49
THE WITNESS: Again, I haven't 10:01:49

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offered that opinion in my report. It's not that I'm not able to give an express definition, but there are plenty of examples of what, you know -- but it's not in my report. I don't think it's used in any claims that I can remember. Maybe I'm wrong about that. 10:01:52 10:01:53 10:01:58 10:02:01 10:02:11 10:02:14 10:02:16 10:02:17

Again, I don't have a photographic memory. If you're asking me about a way I applied "Internet" as used in the claims to the prior art that I analyzed, then I'd be happy to look at that. 10:02:18 10:02:19 10:02:21 10:02:23 10:02:25 10:02:27

BY MR. KUO: 10:02:29

Q. So you haven't analyzed it before, and you're not gonna analyze it now? 10:02:30 10:02:31 10:02:33

A. For this proceeding, I don't think I needed to because Internet, I don't believe, was a claim term that I can recall. Maybe I'm wrong about that. I don't recall that. 10:02:34 10:02:38 10:02:41 10:02:44 10:02:46

If you want to talk -- ask me about what I mapped to Internet, if it was 10:02:47 10:02:48

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used in a claim term, I'm happy to look at that. **10:02:51 10:02:53**

Q. So the answer to my question is, no, you're not going to give me a definition for Internet as we sit here today? 10:02:54 10:02:56 10:02:57 10:02:59

MR. BORDER: Objection. Foundation. Form. 10:02:59 10:02:59

THE WITNESS: It wasn't part of the analysis that I had to define Internet in my analysis, because I don't recall that it was used in a claim term. 10:03:02 10:03:03 10:03:05 10:03:07 10:03:09

And, you know, we could go through this for every word and -- used in networking if you want, but if it wasn't -- you know, we can go through this with every word in the dictionary if you want too. 10:03:12 10:03:13 10:03:15 10:03:18 10:03:24 10:03:26

But if I didn't provide an express construction in my declaration, I don't have a -- you know. And I didn't use -- you know, if you want to ask me about the analysis I actually did do, I'd be happy to look at that, 10:03:28 10:03:30 10:03:32 10:03:40 10:03:42 10:03:44

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to the extent that I used words that you're asking me about or that words that you're asking me about are in the claims, and I can tell you how I did my analysis. 10:03:46 10:03:47 10:03:49 10:03:51 10:03:55

Like, I found examples of claim terms as laid out in the specification itself as examples of what those claim terms encompass. We can look at, you know, any part of my declaration if you'd like. 10:03:55 10:03:58 10:04:00 10:04:03 10:04:07 10:04:09

BY MR. KUO: 10:04:24

Q. Let's take a look at Claim 1 again. And the word "subset" appears in a couple different ways. There's the restricted subset and a less-restricted subset of the protected network, correct? 10:04:27 10:04:30 10:04:44 10:04:46 10:04:49

A. I do see less-restricted subset -- a less-restricted subset on line 16 -- Column 16, line 4, and a restricted subset, lines kind of 8 and 9 of Column 16. Is that what you're asking about? **10:05:01 10:05:14 10:05:17 10:05:20 10:05:24 10:05:26**

Q. I'm just asking you whether the word "subset" appears in Claim 1. 10:05:27 10:05:28

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A. Yes. **10:05:31**

Q. Okay. What is a subset, to your understanding? 10:05:32 10:06:30

A. Do you have a copy of Krantz? **10:06:30**

Q. I do. 10:06:32

A. May I look at it, please? **10:06:33**

Q. Sure. This is Exhibit 1005. 10:06:37

A. Thank you. **10:06:43**

(Whereupon, Previously Marked Exhibit 1005 is identified for the record.) **10:06:47 10:06:47 10:06:47**

THE WITNESS: So if you look at how I analyzed the protected network in the subsets of less less-restricted subset and a restricted subset with respect to Krantz. 10:07:33 10:07:33 10:07:36 10:07:39 10:07:41

BY MR. KUO: 10:07:45

Q. Uh-huh. 10:07:45

A. If you look at the page 41 in my declaration, I've got a figure showing, for example, the protected network of Krantz that I've annotated in a figure from Krantz. **10:07:45 10:07:46 10:07:48 10:07:50 10:07:53**

And then if you look at paragraph 84 on page 47, I discuss how the **10:07:54 10:07:56**

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second network, i.e., VLAN C, is a less-restricted subset of a protected network. 10:08:01 10:08:05 10:08:07

And that's because a person of ordinary skill would understand one example of subset would be something that's within -- like, the less-restricted subset being within the protected network itself and part of it, but not -- that less-restricted subset is part of protected network. 10:08:08 10:08:11 10:08:12 10:08:14 10:08:18 10:08:19 10:08:27 10:08:29

So that's an example of how I -- what I did for my analysis in Krantz with respect to less-restricted subset. 10:08:30 10:08:33 10:08:35

If you look at less-restricted subset, that's this other red highlight on page 41 in the figure showing that that restricted subset is also a part of the protected network. 10:08:39 10:08:40 10:08:43 10:08:44 10:08:48

Q. I think this was inherent in your answer, but I just want to confirm. 10:08:52 10:08:55

A subset is a smaller part of something larger; is that right? 10:08:57 10:09:01

A. Well, that's the example I gave here, but I think mathematically it 10:09:02 10:09:05

doesn't -- mathematical use of subset doesn't necessarily require that. **10:09:10 10:09:19**

But certainly what I've shown here in Krantz, less-restricted and restricted are parts of the whole protected network and they're -- they're -- and they're -- as shown in the figure in Krantz, they're different parts of it, so they don't -- they don't -- they are -- and using some math language, they are disjoint parts of the protected network, at least with the mapping that I did. **10:09:21 10:09:22 10:09:25 10:09:27 10:09:28 10:09:31 10:09:33 10:09:38 10:09:41 10:09:53**

Q. You said mathematically, that the mathematical use of subset doesn't necessarily require that the subset be a smaller part of something larger; is that right? 10:10:10 10:10:19 10:10:22 10:10:25 10:10:28

A. Again, in a mathematical context, I believe that's true, but I would have to -- I would want to confirm that. **10:10:28 10:10:33 10:10:36**

Q. Can you explain what you mean by in a mathematical context that's not true? Give me an example. 10:10:37 10:10:41 10:10:43

A. Well, if we were in a mathematical context, I believe if you have **10:10:46 10:10:48**

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a set of one thing, a subset of that set is also the one thing, could also be the one thing. 10:10:50 10:10:55 10:10:59

Q. Okay. 10:10:59

A. Or, you know, if it was five things, a subset in the mathematical context could also be all five things. 10:10:59 10:11:01 10:11:04

Q. Okay. I thought that's what you were saying, that the subset could be the whole, it doesn't necessarily have to be smaller? 10:11:07 10:11:09 10:11:11 10:11:13

A. In a mathematical context -- 10:11:13

Q. Okay. 10:11:16

A. -- that's my understanding -- that's my -- what I remember right now. 10:11:16 10:11:18

Q. Okay. Is that different from the context of the '460 patent? 10:11:20 10:11:22

A. Well, that issue didn't come up because in my mapping for Krantz, there are -- there are parts of the whole, not -- not the whole, that I mapped the less-restricted subset and the restricted subset, too. 10:11:25 10:11:27 10:11:31 10:11:35 10:11:38 10:11:41

Q. Okay. But -- so at least for purposes of Krantz, you proceeded under 10:11:42 10:11:44

the -- with the definition of subset is at least part of the whole; is that fair? 10:11:49 10:11:52

A. That would include it, sure. But I didn't need to consider the boundaries here because in Krantz I mapped them to subsets -- I mapped them to portions, but not the whole whole. **10:11:55 10:11:59 10:12:01 10:12:05 10:12:08**

Q. Right. 10:12:11

A. But, yeah. **10:12:11**

Q. Okay. That's fine. 10:12:11

I just -- believe it or not, we're still talking about claim construction. I want to -- and I think we're on the same page here. 10:12:17 10:12:19 10:12:22 10:12:24

Subset as is used in the '460 patent, to your understanding, is at least part of the whole? It could be the whole, but it's at least part of the whole? 10:12:30 10:12:32 10:12:36 10:12:39

MR. BORDER: Objection. Foundation. 10:12:41 10:12:41

THE WITNESS: Well, I mapped it to part of the whole. So that's what I say is a subset. 10:12:41 10:12:42 10:12:45

BY MR. KUO: 10:12:46

Q. Okay. 10:12:46

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A. So it -- it's at least part of that. 10:12:46 10:12:49

Q. Yeah. Okay. Looking at Claim 1 again, it's in the first clause where it says, "Receiving a request for access." 10:12:50 10:12:55 10:13:02

Do you see where I am? Claim 1 of the '460 patent. 10:13:05 10:13:13

A. Oh. Sorry. What were you asking about, please? 10:13:15 10:13:19

Q. Yeah. I'm just orienting you on where I am. The first clause, "Receiving a request for access." Do you see where I am? 10:13:20 10:13:22 10:13:25 10:13:27

A. Yes. 10:13:27

Q. Okay. So "Receiving a request for access to a less-restricted subset of the protected network from an access device." 10:13:28 10:13:30 10:13:35 10:13:36

So my question is: What is your understanding of an access device? 10:13:36 10:13:39

A. So I think a POSITA would understand, looking at Krantz, that this client 205 is an example of an access device as used in the claim. 10:14:01 10:14:04 10:14:06 10:14:09

Q. Okay. 10:14:12

A. That's what I've done my mapping for.

Q. So you took the claims and then you just looked in Krantz to find something that you thought would fit within the definition of "access device"?

A. Well, I'm not sure I would exactly characterize it that way.

I looked in Krantz to see -- I did a mapping of the -- of the -- of Krantz to the claim -- the challenged claims.

And part of my mapping was that I mapped client 205 to access device.

Q. Right. So you looked at the claim and -- with respect to the word "access device." You then looked to Krantz, and you found something that you would apply to that access device?

MR. BORDER: Objection. Foundation. Form.

THE WITNESS: Well, based on what a person of ordinary skill would understand access device to include.

BY MR. KUO:

Q. So that's exactly my question.

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What is your definition of what -- what is your understanding of what a POSITA would understand an access device to include? 10:15:17 10:15:20 10:15:21 10:15:24

And just so I'm clear, I'm asking you, did you -- I'm asking, did you have in your mind a meaning for the word "access device" before you looked at Krantz, or did you just look at Krantz and say, oh, here's something I could make and call an access device? 10:15:26 10:15:30 10:15:33 10:15:34 10:15:38 10:15:41 10:15:43

MR. BORDER: Objection to form. 10:15:44

THE WITNESS: No. My analysis is I review the claims, I review the specification, and I think about, you know, what a person of ordinary skill would understand the claim terms to mean. 10:15:44 10:15:46 10:15:48 10:15:51 10:15:53 10:15:55

And then I would -- I do look at prior art to find things that a person of ordinary skill would understand would map -- map to these things. 10:15:56 10:15:57 10:16:00 10:16:03

BY MR. KUO: 10:16:04

Q. Okay. 10:16:04

A. But it -- it's based on, first, a **10:16:04**

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review of the claims and the specification file history. 10:16:07 10:16:10

Q. Great. 10:16:11

So based on the -- your review of the claims and the specification, what was your understanding of the term "access device"? 10:16:12 10:16:14 10:16:16 10:16:18

A. Well, that I would include in Krantz, the client 205 because, for example, you know, Krantz talks about receiving user-entered information, and a user interface can be used to receive user information from a user at client 205. 10:16:19 10:16:23 10:16:34 10:16:37 10:16:41 10:16:44

And it -- I think it basically -- I can go look for it, but it talks about these clients the same way that the -- I believe the patent specification talks about it, the clients -- client devices. Sorry. Access devices. 10:16:47 10:16:53 10:16:54 10:16:59 10:17:01 10:17:12

Q. Is access device and client device the same thing? 10:17:15 10:17:23

A. Well, if the two phrases are used in a -- the claim, then I understand that different phrases should have different -- some different meanings as used in the 10:17:24 10:17:26 10:17:29 10:17:32

claim. But I don't think that's the case. I just couldn't remember the claim term phrase right there. But I mapped access device of the claim to the Krantz's client 205.

Q. Okay. And why did you think that the client device was an access device?

Let me strike that.

Why did you believe that the Krantz client device met the access device limitation?

A. Well, I mean, I can go look and give you an example. At a high level, it's because they talk -- the function that the patent talked about for what an access device does was similar to what the client 205 in Krantz did.

Q. And what was that function?

A. Well, one of the claim things is that "Receiving a request for access to a less-restricted subset of a protected network from an access device." And that's at least one thing. And then there's "A communication port

configured for communicating between the access device and the less-restricted subset of the protected network." 10:18:54 10:18:56 10:18:59

And so -- and then there's "Using the gatekeeper to determine if requirements of the security policy are satisfied by the access device." 10:19:04 10:19:07 10:19:09 10:19:11

And so I lay out in my analysis in my declaration how this client 205 satisfies at least those requirements in the claim. 10:19:12 10:19:16 10:19:19 10:19:22

Q. So let me see if I understand -- I'm not trying to distort anything you're saying. I just want to see if I understand your answer. 10:19:24 10:19:27 10:19:29 10:19:31

So you looked in Krantz for some component that, according to you, performed the claimed functions, and then said that is, therefore, the access device. Is that right? 10:19:32 10:19:39 10:19:41 10:19:46 10:19:48

MR. BORDER: Objection. Foundation. Form. 10:19:48 10:19:48

THE WITNESS: I'm not sure if that -- I'd describe it as doing it the way you just said it, but it was -- 10:19:50 10:19:53 10:19:56

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certainly my analysis shows how the client device -- I'm sorry, client 205 maps to the access device wherever access device is used in the claim -- in the challenged claim. 10:19:58 10:20:00 10:20:05 10:20:10 10:20:12

So I think I have laid that out in my declaration, and so that meets the claim requirements -- claim requirements as laid out in the claims. 10:20:13 10:20:14 10:20:16 10:20:20

BY MR. KUO: 10:20:22

Q. I'm not arguing with you. I think we're actually saying the same thing, and I just want to confirm that we are saying the same thing. 10:20:41 10:20:43 10:20:45 10:20:47

So whatever meaning you had for access device, you talk about particular functions, that it has certain functions, and I asked you what was that function. 10:20:49 10:20:53 10:20:58 10:21:01

And then you said that you looked at the functions that are identified in the claims, and then you mapped that to something in Krantz that, in your opinion, performs those functions. Is that accurate? 10:21:04 10:21:06 10:21:09 10:21:13 10:21:17 10:21:19

MR. BORDER: Objection. 10:21:19

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Foundation. Form. 10:21:20
THE WITNESS: Well, I mean, 10:21:21
again, I'm not sure -- I don't say how 10:21:26
I did that in my declaration. I simply 10:21:28
lay out the mappings. And it's because 10:21:31
I do believe that Krantz discloses for 10:21:34
the reasons I discuss here, discloses 10:21:38
to a POSITA the claimed access device. 10:21:45
And for the reasons that I've 10:21:49
shown, I believe I've done the proper 10:21:51
analysis in my declaration to show 10:21:54
where all the functional requirements 10:21:57
for the claims are met by Krantz. 10:22:00
BY MR. KUO: 10:22:01
Q. Can you give me examples of what 10:22:02
kind of devices are access devices? 10:22:06
MR. BORDER: Objection. Form. 10:22:10
THE WITNESS: Sure. One example 10:22:12
from Krantz is the client 205. 10:22:14
BY MR. KUO: 10:22:16
Q. And what is client -- client 205? 10:22:16
Is that a -- is that a phone? Is it a 10:22:19
laptop? Is it -- what is it? 10:22:22
MR. BORDER: Objection. Form. 10:22:25
(Pause for reading/reviewing.) 10:23:46

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THE WITNESS: So if you look at the '460 patent, it talks about embodiments of access devices. 10:26:56 10:26:57 10:26:59

BY MR. KUO: 10:27:01

Q. Where are you, please? 10:27:01

A. If I look at Column 7, line 21. **10:27:02**

Q. Thank you. 10:27:04

A. And it says there that "The access device is configured to execute a software and/or hardware agent for communicating with gatekeeper, for example, in one embodiment, access device includes an agent" -- yeah -- sorry. Oh, sorry. I mean on -- **10:27:05 10:27:07 10:27:09 10:27:11 10:27:13 10:27:15 10:27:23**

Q. I'm sorry. Where are you? 10:27:24

A. Column 7 of '460, line -- I'm at line 11. **10:27:25 10:27:28**

Q. Oh, okay. Okay. 10:27:29

A. Or let's start at line 13. **10:27:31**

"In various embodiments, access device 230 is a personal computer, a personal digital assistant, a telephone, a wireless device, a communication device, such as a router, Ethernet card, wireless card, another access point, a network **10:27:33 10:27:35 10:27:38 10:27:40 10:27:42 10:27:44**

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device, or the like." 10:27:46

And, for example, the access 10:27:48

device of Krantz talks about client 205 in 10:27:51

paragraph 57. It talks about how client 10:28:01

205 and server 215, which can each be 10:28:04

structured as described above for computer 10:28:07

120. 10:28:09

And if you go look at what it 10:28:10

talks about for computer 120 in paragraph, 10:28:12

for example, 42 of Krantz, it talks about a 10:28:15

"General-purpose computing device in the 10:28:18

form of conventional computer 120, 10:28:19

including a processing unit, system memory, 10:28:22

system bus" -- I'm skipping the numbers -- 10:28:25

"that couples various system components, 10:28:27

including the system memory, to the 10:28:29

processing unit." And it goes on. 10:28:30

But, for example, that's -- 10:28:35

that's how it meets the -- some of the 10:28:37

requirements of access device, how the 10:28:39

client 205 does. But then I do analyze how 10:28:42

it meets the functional requirements in the 10:28:46

various respected claim element analysis in 10:28:48

my declaration. 10:28:52

Q. Okay. So my original question, 10:28:53

before you started reviewing, was simply, what is client 205. And I asked if it was a phone or a laptop. 10:29:14 10:29:19 10:29:23

And, again, I'm -- you can correct me if I'm wrong. I think what you're saying is that according to the patent, an access device is -- while it has to perform certain functions, that an access device in a general sense is just any device that can access a network. Is that fair? 10:29:25 10:29:26 10:29:28 10:29:30 10:29:36 10:29:38 10:29:40 10:29:42

A. Well, I mean, I think that the patent specification as I -- you know, in Column 7 around line 13 talks about examples of access devices, and, you know, they have communications -- some of them, you know -- well, they do have communications capability. **10:29:45 10:29:46 10:29:49 10:29:51 10:29:58 10:30:04 10:30:05**

And what I'm saying is that they -- in Krantz, with respect to what it talks about as client 205, it is a computing device. **10:30:06 10:30:08 10:30:14 10:30:17**

You know, I've pointed you to paragraph 42, and probably 57, where Krantz discusses this computing device, and that's **10:30:18 10:30:21 10:30:24**

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the mapping that I did. **10:30:28**

But further, that this client **10:30:30**
device 205 also, as I discuss in my **10:30:31**
declaration where appropriate, there are **10:30:35**
other functional limitations required for **10:30:37**
access device. And I did the proper **10:30:39**
analysis, I believe, of mapping it to all **10:30:41**
the different functions as well. **10:30:45**

Q. Dr. Houh, I understand that. My 10:30:46
question is much more simple than that. 10:30:48

It is simply: An access device, 10:30:52
irrespective of the function, is something 10:30:57
that is trying to connect to a network; is 10:31:00
that fair? 10:31:06

A. I mean, I believe when we were **10:31:06**
looking at the 460 patent, it did talk **10:31:09**
about access devices having some sort of **10:31:11**
communications capability. **10:31:14**

Q. Okay. So a communication device 10:31:15
that's trying to connect to a network? 10:31:17

MR. BORDER: Objection. Form. 10:31:24

THE WITNESS: I mean, the example 10:31:25
in paragraph 7 at line -- I'm sorry, 10:31:26
Column 7 of the '460, at line 11, is 10:31:29
that "Access device is a computing 10:31:32

device configured to operate as an endpoint in a communication channel, including access point and access device 230. 10:31:34 10:31:36 10:31:40 10:31:42

And so it's using that phrase "access device." 10:31:45 10:31:47

BY MR. KUO: 10:31:48

Q. Uh-huh. 10:31:48

A. And it's configured to be an endpoint in the communication channel. And that's one way it's talking about access device, and I'm -- you know, it is part of whatever protected network as laid out in the claim. 10:31:48 10:31:51 10:31:54 10:31:57 10:32:05 10:32:07

So I think I've done the proper analysis with respect to client 205, showing how it meets -- how it is the -- showing my mapping to access device and how it discloses the access device of the challenged claims. 10:32:07 10:32:09 10:32:12 10:32:16 10:32:19 10:32:24

Q. You brought in another term in your answer that I want to understand. 10:32:26 10:32:27

You said "endpoint," right? 10:32:32

A. That's what the '460 patent used. 10:32:34

Q. Yeah. What is an endpoint, to 10:32:41

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your understanding? 10:32:44

A. Well, one thing that would be an endpoint is something that -- would be -- one example would be a termination point of a communication where -- as opposed to something that is just passing through communications, as opposed to terminating the said communications. 10:32:44 10:32:46 10:32:56 10:32:58 10:33:01 10:33:03 10:33:13

So I think endpoint, one example would encompass that thought. 10:33:14 10:33:21

Q. Okay. So the endpoint is -- I think you said is a termination of a communication and not just a passthrough? 10:33:24 10:33:26 10:33:28

A. Well, that's an example. 10:33:30

Q. All right. Looking again at Claim 1 of the '460 patent. 10:33:32 10:33:36

Again, in the first clause, starting "Receiving a request," like, the third line down, there's reference to a communication port of an access point. 10:33:56 10:33:58 10:34:05 10:34:07

Do you see that? 10:34:10

A. Sorry. Third line down from where? 10:34:11 10:34:14

Q. The first clause, "Receiving a request." 10:34:14 10:34:16

A. Yeah. **10:34:16**

Q. Within that clause, the third line down is -- 10:34:17 10:34:19

A. Okay. **10:34:20**

Q. -- "the request received through a communication port of an access point." 10:34:21 10:34:23

Do you see that? 10:34:26

A. Yes. **10:34:26**

Q. Okay. What was your -- what was the ordinary and customary meaning of access point that you used as part of your analysis for access point? 10:34:27 10:34:34 10:34:37 10:34:39

A. Well, I looked at examples given in the '460 patent. So if you look at -- I cite it in paragraph 88 of my declaration. **10:34:58 10:35:00 10:35:04**

Q. Uh-huh. 10:35:08

A. I talk about how the '460 patent explains that "Access point 215 is, for example, a network switch, a wireless access point, a remote access virtual private network (VPN) a secure socket layer VPN, firewall, or the like." And it goes on. **10:35:08 10:35:11 10:35:14 10:35:16 10:35:18 10:35:22 10:35:25**

But -- so what I've mapped access point to in Krantz is what -- what Krantz **10:35:26 10:35:33**

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actually calls access point 209 -- 10:35:44

Q. Uh-huh. 10:35:49

A. -- that I've shown in green in the figure on page 49. 10:35:49 10:35:52

And, you know, as in the '460 patent, Krantz's request is received through a communication port, and I've annotated that port 251 in orange of an access point shown in green. 10:35:54 10:35:57 10:35:59 10:36:02 10:36:05

And then the next page shows a more detailed drawing of that mapping. 10:36:09 10:36:11

Q. Dr. Houh, I understand -- and we'll talk about your mapping. I didn't -- I'm really just asking what your understanding of the meaning of access point is. And you've cited some examples from the '460 patent. 10:36:14 10:36:19 10:36:20 10:36:23 10:36:25 10:36:27

If you were to explain to somebody what an access point is without just giving examples, what is an access point? 10:36:32 10:36:33 10:36:35 10:36:38

A. Well, I mean, because if I was explaining to someone, I wouldn't necessarily be talking about the '460 patent. 10:36:39 10:36:43 10:36:44 10:36:45

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But in the context of the '460 patent, I would use the examples that are given explicitly as to what examples of access points are.

And those are listed in paragraph 88, which cites to Column 7, lines 57 through 65 of the '460 patent specification, and those -- those examples -- you know, it talks about how access point includes a series of communication ports.

Q. Uh-huh.

A. And the example I gave in Krantz is an access point with communication ports, and so I think a person of ordinary skill would have understood that the -- what I've mapped for the access point -- that the access point of Krantz 209, including communication port 251, is the claimed access point.

Q. So let's look at the '460. And you've -- you've referenced Column 7, line -- I think you said 57, starting at least at line 57.

You said, "Access point 215 is,

for example, a network switch, a wireless access point, a remote access virtual private network (VPN), secure socket layer VPN, firewall, or the like." 10:38:03 10:38:04 10:38:07 10:38:13

So those are examples of what an access point could be, correct, in the '460? 10:38:18 10:38:26 10:38:28

A. Yes. **10:38:29**

Q. Okay. And so I'm -- I understand that you said that a person of ordinary skill in the art would understand what an access point is based on those examples. Correct? 10:38:29 10:38:36 10:38:39 10:38:40 10:38:45

A. I'm not sure if I said exactly that way, but a person of ordinary skill would understand that the examples listed in the specification of what an access point is are -- are things that would fall within the scope of an access point as used in the claim. **10:38:45 10:38:47 10:38:49 10:38:50 10:38:53 10:38:57 10:38:59**

Q. Okay. So then what is an access point? 10:39:00 10:39:03

A. Well, an access point includes these examples given in the '460 patent. **10:39:04 10:39:06**

Q. I understand it includes the 10:39:09

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examples, and you said that a person of ordinary skill in the art would understand that these examples given would fall within the scope of what an access point is. 10:39:11 10:39:14 10:39:15 10:39:18

And I want to -- can you give me a definition for what an access point is other than pointing me just to the examples? 10:39:21 10:39:23 10:39:24 10:39:26

MR. BORDER: Objection. Outside the scope. 10:39:27 10:39:28

THE WITNESS: Well, a person of ordinary skill would also understand that the Krantz's access point 209 is an -- is within the scope of access point as used in the claims as well, so -- 10:39:28 10:39:29 10:39:31 10:39:36 10:39:41 10:39:42

BY MR. KUO: 10:39:42

Q. I want to understand the basis of your opinion, because embedded in your opinion is an understanding to a person of ordinary skill in the art of what an access point is. 10:39:43 10:39:45 10:39:49 10:39:51 10:39:52

What is your understanding of what an access point is? 10:39:53 10:39:54

A. So a person of ordinary skill **10:39:57**

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reading the '460 patent, seeing the term "access point" in the claim, would understand that the access point encompasses -- as claimed, encompasses the examples of access point as given in the specification. 10:40:02 10:40:04 10:40:08 10:40:10 10:40:14 10:40:16

Q. So in the specification, it concludes the sentence with "or the like." What other types of devices would fit within your understanding of what an access point is? 10:40:16 10:40:18 10:40:21 10:40:24 10:40:27

MR. BORDER: Objection. Outside the scope. 10:40:28 10:40:28

THE WITNESS: Just what it says, like devices. But what I mapped it to -- 10:40:28 10:40:30 10:40:33

BY MR. KUO: 10:40:33

Q. And what -- 10:40:34

A. -- is literally something in Krantz called access point 209. 10:40:34 10:40:36

And my analysis of Krantz showed that it was consistent with what these examples of -- of access point as laid out in the specification. 10:40:38 10:40:40 10:40:42 10:40:44

So I don't know why there's some 10:40:45

confusion here about that. **10:40:48**

But access point is -- is **10:40:49**
literally what Krantz calls 209, and it **10:40:55**
happens to meet the functional requirements **10:41:01**
as laid out. So I'm -- I'm not sure what **10:41:03**
the confusion is about. **10:41:12**

Q. Dr. Houh, I'm not saying that 10:41:13
there's any confusion or anything. I'm 10:41:15
just asking you questions. And I -- part 10:41:17
of your analysis -- and correct me if I'm 10:41:20
wrong. 10:41:22

Part of your analysis was to have 10:41:23
an ordinary and customary meaning for the 10:41:31
claim terms and then to see if the prior 10:41:34
art had a similar teaching; is that right? 10:41:40

A. Within the claim -- with the **10:41:49**
plain and ordinary meaning within the **10:41:53**
context of the '460 specification and **10:41:54**
prosecution history -- **10:41:56**

Q. Right. 10:41:57

A. -- that's how I understand the **10:41:57**
proper analysis to be done for how a POSITA **10:42:00**
looks at it at the time of the invention. **10:42:01**

Q. Sure. So what I want to know is, 10:42:03
what was your customary and ordinary 10:42:05

meaning for an access point in view of your looking at the specification? 10:42:07 10:42:14

And I understand you've given me examples. Is that it? Are the examples what an access point is, or is it broader than that? 10:42:17 10:42:19 10:42:28 10:42:30

MR. BORDER: Objection. Form. 10:42:31

THE WITNESS: The examples are not limiting. It clearly says "or the like." 10:42:32 10:42:32 10:42:37

BY MR. KUO: 10:42:38

Q. Right. 10:42:38

A. And it's clear that the -- to a POSITA, I think, looking at Krantz, looking at the '460 spec and access point in context of a specification, would understand that an access point of Krantz, literally called access point, falls within the scope of access point as claimed. **10:42:38 10:42:41 10:42:43 10:42:48 10:42:49 10:42:51 10:42:54**

Q. Can you tell me what the scope of access point as claimed is? 10:42:58 10:43:00

A. Yes. It includes the examples given in the '460 patent, and it also, as I've mapped, it includes the access point of Krantz. **10:43:02 10:43:06 10:43:08 10:43:12**

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Q. No. So I've asked you for the scope, not what it includes. Those are -- do you understand those are two different things? 10:43:13 10:43:15 10:43:18 10:43:19

A. Well, I'm giving you examples of what are within the scope, and that's -- that's the analysis that I did, clearly showing that -- that Krantz is disclosing the access point. 10:43:20 10:43:22 10:43:24 10:43:26 10:43:28

Not only is it called access point, but I show how it meets the other functional requirements at different points of my analysis with respect to the claims that -- the claim terms that use the phrase "access point." 10:43:30 10:43:32 10:43:34 10:43:36 10:43:38 10:43:41

Q. You give me a definition for access point -- 10:43:41 10:43:43

MR. BORDER: Object -- 10:43:45

BY MR. KUO: 10:43:45

Q. -- that isn't simply pointing me to examples? 10:43:45 10:43:47

MR. BORDER: Objection. Outside the scope. 10:43:48 10:43:50

THE WITNESS: I mean, we could do this all day for other words, like 10:43:50 10:43:52

request, receive, through, you know. But I didn't offer express definitions of every word. 10:43:55 10:43:58 10:44:00

I interpreted them as a person of ordinary skill would understand based on the specifics and the prosecution history of the '460 patent. 10:44:01 10:44:02 10:44:08 10:44:09

And I found things that a POSITA would clearly understand map to these -- you know, in the prior art, things that disclose these very same claim elements. 10:44:10 10:44:12 10:44:15 10:44:18 10:44:20

And so what you're asking is -- is not -- is not the analysis that I did. The analysis I did was with respect to how does Krantz disclose an access point. 10:44:21 10:44:26 10:44:30 10:44:32 10:44:35

Oh, literally there's something called access point in Krantz. But I didn't use it just because it was literally called the same thing. 10:44:35 10:44:37 10:44:39 10:44:41

I looked at Krantz. I looked at examples and how a person of ordinary skill would have understood access point to encompass. And it clearly 10:44:43 10:44:45 10:44:48 10:44:50

fell well within the scope. 10:44:53
And so there's -- there's not -- 10:44:55
what you're asking about, laying out 10:45:00
express definitions of every single 10:45:02
word in the claims is just not what 10:45:04
anybody does in an IPR declaration. 10:45:06
BY MR. KUO: 10:45:09
Q. I'm not asking you for every 10:45:09
single word. I'm asking you a specific 10:45:11
phrase, "access point." 10:45:14
And all I'm asking you -- and you 10:45:15
said that part of your analysis was to look 10:45:18
at the claims, look at the specification, 10:45:22
and have an understanding of the claim 10:45:26
terms to a POSITA of the scope of access 10:45:29
point. 10:45:36
And so I just want to know, what 10:45:36
was your understanding of the scope of the 10:45:39
term "access point." 10:45:41
A. Sure. It's very simple. Access 10:45:43
point -- the scope of access point includes 10:45:46
very specific examples given in the 10:45:48
specification of the '460, and the example 10:45:50
in Krantz was -- fell within -- it's 10:45:55
parallel to those examples. 10:46:01

And so I'm not sure why there's any need to go beyond to see if -- is this light switch an access point? Maybe it has some communication capability. 10:46:02 10:46:04 10:46:10 10:46:13

That wasn't the example. The example would be clearly understood, and I think a POSITA clearly understands that the access point of Krantz as -- is, you know -- is an example of the very same access point given as a person of ordinary skill would understand is within the scope of access point in reviewing the '460 patent at the time of the invention. 10:46:15 10:46:16 10:46:20 10:46:23 10:46:27 10:46:30 10:46:36 10:46:38 10:46:42

Q. So you'll agree with me that the examples that are given in the '460 patent are not limiting as to the scope of access point, correct? 10:46:45 10:46:56 10:46:59 10:47:02

A. Sure. I mean, I think generally they're not, but I haven't laid out and analyzed what other possible things could have been. Because with respect to Krantz, the access point was similar to those examples. 10:47:04 10:47:09 10:47:12 10:47:14 10:47:15 10:47:17

Q. Right. So -- 10:47:18

A. But it does say "or the like." 10:47:18

I'm not going to deny that. **10:47:22**

Q. Okay. So all you did was -- 10:47:24

strike that. 10:47:27

So what you did was to say, here 10:47:27

are examples of access points in the '460, 10:47:30

and then I think you used the word 10:47:34

"parallel example" of what they call an 10:47:37

access point in Krantz and said, therefore, 10:47:40

Krantz maps on the claimed access point. 10:47:45

Is that right? 10:47:47

MR. BORDER: Objection. 10:47:47

Foundation. Form. 10:47:48

THE WITNESS: Well, I mean, the 10:47:49

access point as shown in Krantz also 10:47:54

meets all the other functional 10:47:56

requirements that's laid out in the 10:47:58

claim. 10:48:00

So as -- you know, I think we 10:48:00

went through some of those, for 10:48:02

example, that the access point -- there 10:48:03

has to be some data communicated 10:48:09

between the access -- sorry. 10:48:12

Well, there are -- we looked at 10:48:16

them earlier. I -- I don't -- but 10:48:17

whatever the functional requirements of 10:48:21

access point are as laid out, I do show -- so that's -- you're oversimplifying things. I do show how that access point 209 meets all -- all the points where there's some claim element with respect to access point. 10:48:23 10:48:25 10:48:27 10:48:29 10:48:34 10:48:38

BY MR. KUO: 10:48:40

Q. Okay. Part of the access point -- part of the access point claimed in the '460 -- I'm sorry. Strike that. 10:48:42 10:48:43 10:48:52

In the '460 patent, the claim also recites a communication port of an access point, right? 10:48:56 10:49:03 10:49:07

A. Yes. I believe so. **10:49:09**

Q. Can you explain what a communication port is? 10:49:10 10:49:14

MR. BORDER: Joe, can we get time to take a break soon? 10:49:42 10:49:44

MR. KUO: Uh-huh. 10:49:45

(Pause in testimony.) 10:50:18

MR. KUO: You know what, we can circle back to this question. I just -- I just started this line. So why don't we just take a break right now, and we'll come back. 10:50:19 10:50:20 10:50:21 10:50:23 10:50:25

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THE WITNESS: Sure. 10:50:26
(Whereupon, a recess was taken at 10:50:26
10:50 a.m.) 10:58:37
MR. KUO: We can go back on. 10:58:37
BY MR. KUO: 10:58:41
Q. So we took a short break, and 10:58:43
just for the record, I don't know if you 10:58:47
saw, we have Andrew Schwerin, Brian Landry, 10:58:49
and Eric Cole have all joined. Andrew and 10:58:53
Brian are attorneys with our firm, and 10:58:56
Dr. Cole is our expert witness. 10:59:02
So with that little bit of 10:59:13
housekeeping, we took a break and I had 10:59:15
asked -- before the break, I asked you the 10:59:15
question -- I'll just repeat it for 10:59:16
clarity. 10:59:19
There's a claim term recited of a 10:59:21
communication port of an access point, so I 10:59:24
wanted you to explain to me what a 10:59:28
communication port is. 10:59:31
A. So if you look at the patent, 11:00:02
Column 7 -- actually, I have cited to this 11:00:05
section in paragraph 88 -- 11:00:07
Q. Okay. 11:00:09
A. -- although I omitted a few 11:00:09

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words. But if you look at the Column 7, line 60 -- 11:00:10 11:00:17

Q. Okay. 11:00:19

A. -- or 16. We can start in 60. "When embodied in a network switch, access point 215 includes a series of communication ports, designated ports 305A through 305G, and configured for communicating with devices such as access device 230, router 220." And if you look at the access point of Krantz, it actually includes a series of ports. 11:00:20 11:00:25 11:00:28 11:00:31 11:00:34 11:00:38 11:00:42 11:00:45 11:00:49 11:00:52

Q. Uh-huh. 11:00:54

A. That's what the figure actually -- I will use the word "literally" here, uses the term "port" and "access point." And the port -- there are two ports given in the figure shown on page -- Figure 2 of Krantz, which I have annotated on page 49, and they are configured -- the ports -- various ports are speaking with both the client and the routing device. So I think a person of ordinary 11:00:54 11:00:59 11:01:00 11:01:04 11:01:04 11:01:06 11:01:09 11:01:13 11:01:18 11:01:21 11:01:27

skill would see that these communication ports are basically the exact same example given in the '460 patent as to what a communication port is.

Q. Okay. So you referred me to the '460 patent, Column 7, line 60, 61, and about -- it says that the -- when embodied in a network switch, access point 215 includes a series of communication ports, and so forth.

So that's in the particular embodiment of a network switch.

In the network switch embodiment back in the time of this invention, is that actually like a plug that you plug in, a physical port?

A. Well, I mean, it can include more than -- it could, for example, include the physical -- sometimes people talk about a port, but it's also the -- it could also be part of the function of what the port does as well.

So this is configured to communicate. A physical port would need to be -- would have -- you know, if you have

an empty jack that you plug something into, that wouldn't be configured to communicate with devices such as access device. So you do need a little more than just a physical object that's stand-alone. 11:02:42 11:02:46 11:02:48 11:02:50 11:02:52

Q. I understand what you're saying. I mean, it has -- one example, at least in the network switch example, is you could have a physical plug, but it has to be able to communicate as -- as intended; is that fair? 11:02:53 11:02:55 11:02:58 11:02:59 11:03:03 11:03:08

A. Sure. And that would include additional hardware and software, for example, for it to be properly configured. And I think Krantz is disclosing that. 11:03:08 11:03:09 11:03:11 11:03:13

Q. And am I correct that the '460 -- I think -- in fact, I think you talked about this earlier. 11:03:18 11:03:23 11:03:25

No, I'm sorry. In paragraph -- in Column 7, right above what we just talked about -- sorry, line 55, it talks about access point -- actually, sorry, line 57, "Access point is a network switch, a wireless access point, remote access," et cetera, et cetera. 11:03:29 11:03:32 11:03:36 11:03:40 11:03:43 11:03:45 11:03:48

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So it's not limited to the physical plug, for example, like in a wireless access point, correct? 11:03:49 11:03:52 11:03:56

A. Sure. Well, I mean, this doesn't give an example of -- for the wireless, but it gives an example for a switch which -- which, you know, have -- you know, like an Ethernet switch often has -- you know, it might be 4-port, 8-port, 16-port, 32-port switch -- **11:04:01 11:04:04 11:04:07 11:04:10 11:04:14 11:04:17 11:04:17**

Q. Uh-huh. 11:04:17

A. -- and have that many different plugs on it but each configured internally to be able to communicate across the switch. **11:04:23 11:04:25 11:04:27 11:04:29**

Q. And how -- when you say configured internally to communicate across the switch, are you talking about from the input port to the output port? 11:04:30 11:04:34 11:04:40 11:04:42

A. Well, when embodied in a switch, that's part of the purpose is to transfer data between different -- different ports where data can both, you know, be input and output, for example, at the ports. **11:04:44 11:04:47 11:04:49 11:04:53 11:04:56**

Q. And so we can talk about it in 11:04:59

the context of a switch. I'm fine with that. But if there's a -- if there's a difference between a switch and some other type of access point from a technical standpoint, please let me know. 11:05:06 11:05:07 11:05:10 11:05:12 11:05:17

But in the context of a switch, how does -- how do you configure the switch so that one Ethernet port input goes out where you want it to go? 11:05:21 11:05:24 11:05:30 11:05:38

MR. BORDER: Objection. Outside the scope. 11:05:39 11:05:41

THE WITNESS: Well, I -- I mean, if you -- there are many ways to do that. I don't really discuss -- I don't think I discuss the detailed operation. 11:05:41 11:05:44 11:05:48 11:05:49 11:05:51

But, for example, if we were talking about an Ethernet switch -- 11:05:51 11:05:52

BY MR. KUO: 11:05:54

Q. Uh-huh. 11:05:54

A. -- often the ports will have -- the switch itself will have a buildup of tables of what devices identified by their MAC addresses are connected to each port. 11:05:54 11:05:58 11:06:02 11:06:05

And if it's in the table, the 11:06:09

destination address, it can look up the destination port. If it's not in a table, sometimes it might have to broadcast to all the other ports that packet because it hasn't learned the address yet. 11:06:11 11:06:13 11:06:16 11:06:18 11:06:22

Q. Okay. 11:06:23

A. But once it receives a packet with a source address from a device, it can -- on a particular port, it can add that to a forwarding cable. So that's one example of how an Ethernet switch might -- might have all that happen. 11:06:23 11:06:25 11:06:26 11:06:28 11:06:31 11:06:34

Q. Okay. And then in the context of this -- the Ethernet switch that you were just talking about and this table -- what kind of -- you called it something. 11:06:38 11:06:40 11:06:42 11:06:49

A. A forwarding table perhaps. I mean, there could be other words for it, but -- but it could be called a forwarding table. 11:06:53 11:06:56 11:06:59 11:07:02

Q. A forwarding table? Okay. Well, let's use that. 11:07:02 11:07:04

This forwarding table, how is -- how is that established? 11:07:05 11:07:07

MR. BORDER: Objection. Outside 11:07:09

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the scope. 11:07:10
THE WITNESS: Well, again, I 11:07:10
don't really discuss this, but one 11:07:11
example of what I might -- what -- how 11:07:13
the entries might be established is you 11:07:16
receive a packet, say an Ethernet 11:07:18
packet, with a source address. 11:07:23
They have source and destination 11:07:24
MAC addresses in the headers that if 11:07:26
you receive it on a port, then you know 11:07:30
that the device with a source address 11:07:31
is -- is connected to that port. And 11:07:33
Ethernet addresses should be unique. 11:07:37
You can do spoofing, but they should 11:07:40
be -- they should be globally unique. 11:07:42
So you know a device with an 11:07:44
Ethernet source address is -- had sent 11:07:46
something on that port, so you know 11:07:49
that that's where you should send data 11:07:51
to with that Ethernet destination 11:07:53
address if you received a packet with 11:07:55
that destination address. 11:07:56
BY MR. KUO: 11:08:00
Q. Well -- I'm sorry. If you're -- 11:08:00
A. Let me just finish that. **11:08:03**

Q. Sure. 11:08:04

A. Then it would add an entry to the forwarding table saying Ethernet address, whatever the full address is, is at port 7. **11:08:04 11:08:06 11:08:10**

Q. That's something that's in the table -- that forwarding table? 11:08:12 11:08:14

A. Well, that's one example of what a switch might have. **11:08:16 11:08:18**

Q. Okay. 11:08:19

A. And one example of how a switch might learn addresses. **11:08:19 11:08:21**

Q. But the forwarding table, I guess my question -- maybe my question wasn't clear. 11:08:24 11:08:28 11:08:30

How is that forwarding table first programmed? Is that the right word? 11:08:31 11:08:32

A. Yes. So I've tried to explain that. So when you power up a switch, a forwarding table might be empty. **11:08:37 11:08:38 11:08:41**

Q. Okay. 11:08:42

A. But as it receives packets from input on different ports which have source MAC addresses in the headers, it can add an entry into the table so that the destination of that source address received **11:08:42 11:08:45 11:08:49 11:08:52 11:08:54**

on a particular port maps to that particular port. 11:08:58 11:08:59

Q. Oh, okay. 11:09:00

A. So oftentimes, that's one way of doing this, which is you can learn the addresses that are attached to each port. And because they're supposed to be globally unique, you shouldn't have a problem. 11:09:01 11:09:04 11:09:06 11:09:08 11:09:10

Now, you could move devices between ports, but then as soon as that sends a new entry with a source port, the -- one example is the device would recognize that now that MAC address has moved to a different port and could update the forwarding table. 11:09:11 11:09:16 11:09:18 11:09:22 11:09:23 11:09:27 11:09:28

So -- but -- and if there's no entry at all in a destination, for a destination, then one way that could deal with that is you could flood that packet to all the ports, and then if there's a response, you'd learn it as soon as the device responded and you could set up an entry so that you wouldn't have to flood packets continuously. 11:09:30 11:09:33 11:09:35 11:09:37 11:09:40 11:09:43 11:09:45 11:09:47 11:09:50

So you only flood when you don't 11:09:51

know where a device is, which ports it's connected to. That's just one way to keep -- some people may implement, like, an Ethernet switch. 11:09:53 11:09:55 11:10:00 11:10:02

Q. So in this -- when you flood, is that another way to just say broadcast to all the output ports? 11:10:03 11:10:12 11:10:15

A. That's one -- I mean, yes, that's -- that's what would be meant by that. But it's not necessarily intended to go past very far. This example might just be you're just flooding to -- you know, just to the devices. But you're still sending it with the proper destination port. 11:10:16 11:10:18 11:10:20 11:10:22 11:10:25 11:10:27 11:10:29 11:10:31

Q. Uh-huh. 11:10:32

A. So because you don't know -- say you have an eight-port switch. You get a packet for that with a destination address. You flooded out all the port, maybe seven, maybe eight. You can decide whether you want to send it to yourself again. That's probably an optimization. 11:10:32 11:10:35 11:10:37 11:10:40 11:10:42 11:10:44 11:10:51

But then as soon as that device responds with a proper packet, then you 11:10:52 11:10:55

would know what port it's on, but -- so that's one reason you would flood.

And you wouldn't have to really flood packets for very long, only until there is a response and you could update your table.

Q. So that was my next question.

So then you flood the one time and you figure out which one is the correct one, and then the table gets updated?

A. I mean, how many times depends on how long the response takes and how many packets arrive before you get a response. So hopefully it's only once, but maybe it could be -- you could have to flood a few packets --

Q. Okay.

A. It just depends on timing --

Q. Got it.

A. -- how far apart the packets for that destination are and when the table gets updated.

Q. Got it.

And that table, that's something that's on the switch itself? Or I think

the Ethernet switch we've been talking about? 11:11:43 11:11:45

A. Yeah, for example, that might be part of an Ethernet switch. **11:11:45 11:11:47**

Q. And do wireless access points work in basically the same way but just wirelessly? 11:11:49 11:11:52 11:11:55

MR. BORDER: Objection. Outside the scope. 11:12:01 11:12:03

THE WITNESS: Well, I don't think I said anything about that. But, you know, if a wireless access point also has a -- you know, I think I have some access points where you can plug in that has four Ethernet ports. 11:12:03 11:12:04 11:12:05 11:12:08 11:12:11 11:12:13

BY MR. KUO: 11:12:15

Q. Okay. 11:12:15

A. And that then -- you know, someone might choose to implement a table in a very similar way. **11:12:15 11:12:20 11:12:23**

Q. Okay. In Claim 1 of the '460 is the term "gatekeeper." Do you remember that? Or you can look at it, obviously. 11:12:24 11:12:45 11:12:49

A. Yes, I do. **11:12:51**

Q. Do you know what a gatekeeper is? 11:12:51

A. Well, I mean, part of what gatekeeper is required to be is laid out by the claims.

Q. Right. But I mean, do you have an understanding of what a gatekeeper is in -- in the -- in the art?

(Pause for reading/reviewing.)

A. Yeah. So if you look at the -- I do talk about this starting around page 62 and that it talks -- I say, well, the abstract of the '460 patent talks about the gate -- how the gatekeeper is configured to enforce a security policy before granting access to a less-restricted subset of the network.

And then I talk about how Krantz similarly discloses that. So this is the prior art.

Oh, by the way, I think the -- the patent itself admits that the gatekeeper is practiced in the prior art.

But Krantz discloses this in that -- I talk about that starting around paragraph 112 on page 63, how the gatekeeper is what is applying a security

policy. And I -- I highlighted that in gray in the figure on page 64.

And so that's -- that's the server in 215, which is -- which is applying the security policy, which is what the abstract talks about as a gatekeeper being configured to enforce a security policy before granting access to a less-restricted subset of the network.

And so I think I lay out in this section how the prior art, such as Krantz, discloses the claim gatekeeper.

Q. Dr. Houh, I understand that. I guess my question is: Did -- when you read the claim, the '460 patent in view of the specification, did you have any problems understanding what the claimed gatekeeper was?

MR. BORDER: Objection. Form.

THE WITNESS: No. I think a person of ordinary skill would understand that one example of what the gatekeeper is configured to do is to enforce a security policy. It's one of its functions.

And there's a similarly -- similar device that performs that function within Krantz that is the server 215. 11:17:37 11:17:39 11:17:42 11:17:44

BY MR. KUO: 11:17:51

Q. Can we take a look at Claim 2 of the '460? 11:18:04 11:18:07

A. Sure. **11:18:10**

Q. And it says, "The method of Claim 1 further comprising authenticating a user of the access device." 11:18:10 11:18:13 11:18:16

Did you have an understanding of what "authenticating a user" meant? 11:18:21 11:18:22

(Pause for reading/reviewing.) 11:20:18

A. I mean, I do have an understanding of how a POSITA would understand authenticating a user of the access device, and that would include the example that I pointed to in Krantz, which I'm saying is disclosing this element in part, which is that if you look at paragraph 135, starting on page 77. **11:20:27 11:20:29 11:20:32 11:20:34 11:20:37 11:20:40 11:20:41 11:20:45**

Q. I'm sorry. Say that paragraph again. 11:20:50 11:20:52

A. Page 77, paragraph 135. **11:20:54**

Q. Okay. I'm there. 11:20:55

A. It talks about how Krantz discloses that "When credentials are sent to server 213 [sic], authentication module 217 can receive the credentials (e.g., user-identifier and password) and compare the credentials to entries in the user database. If credential information matches an entry in user database, the identity of the user is authenticated." And so I think that's just one example of what would be understood as meeting further -- meaning authenticating a user of the access device. 11:20:56 11:20:58 11:21:00 11:21:03 11:21:06 11:21:09 11:21:11 11:21:13 11:21:16 11:21:19 11:21:20 11:21:24 11:21:27

Q. So if I understand your answer correctly, an example of authentication is user ID and password; is that right? 11:21:29 11:21:31 11:21:36

MR. BORDER: Objection. Foundation. 11:21:40 11:21:40

THE WITNESS: Well, that's what I've mapped authenticating of a user to in Krantz. 11:21:41 11:21:43 11:21:46

And I think that -- that would be understood by a POSITA to fall within the claim scope of authenticating a 11:21:47 11:21:49 11:21:52

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user of the access device. 11:21:54

BY MR. KUO: 11:21:55

Q. Do you have an understanding as to other examples, perhaps not in Krantz, but other examples of authenticating a user of a device? 11:21:55 11:21:56 11:21:59 11:22:10

(Pause for reading/reviewing.) 11:23:41

A. I'm looking at the '460 patent at Column 6. **11:25:00 11:25:04**

Q. Okay. 11:25:05

A. And in the paragraph starting at 3, but going to line 52, and I do see here that -- that this is talking about requirements for user identification. This is line 41. **11:25:06 11:25:07 11:25:13 11:25:15 11:25:19**

"Requirements for user identification such as user names and passwords." **11:25:20 11:25:20 11:25:22**

And then down below, further below, it talks about -- line 47 -- well, there's a line 46, "A security policy that requires a user of access device 230 to provide a username and password." **11:25:24 11:25:27 11:25:33 11:25:35 11:25:38**

Q. Uh-huh. 11:25:40

A. And so I think that would be **11:25:40**

understood by a POSITA to be what it's talking about here where in the claim it -- the claim says authenticating a user of the access device, and -- and Krantz is giving the same example of -- of user identifier and password. 11:25:42 11:25:47 11:25:49 11:25:55 11:25:57 11:26:00

I'm not sure I see another example with respect to authenticating a user of the access device. 11:26:01 11:26:03 11:26:07

Q. Okay. 11:26:08

A. But I can keep looking. But it's giving the same example as what Krantz is giving about a user providing a username and password. 11:26:08 11:26:11 11:26:15 11:26:17

Q. Okay. So is it fair to say that, in your opinion, authenticating a user includes, at least as examples, username and/or password? 11:26:18 11:26:32 11:26:33 11:26:38

A. Well, I mean, the '460 patent uses the phrase "username and password" in both those places. There's no "or." 11:26:53 11:26:56 11:26:59

Q. Okay. 11:27:02

A. But certainly Krantz actually had more detail that you provide a username -- a user identifier and password. But you 11:27:02 11:27:05 11:27:07

further actually have to compare the credentials to what's in the database. 11:27:10 11:27:12

So you simply -- I mean, I think a POSITA would understand that you would do that. You wouldn't just allow anyone with a username and any password, right. 11:27:14 11:27:15 11:27:16 11:27:19

Q. Sure. You have to make sure it's the right username and password, right? 11:27:21 11:27:22

A. Yes. And Krantz actually says that. I didn't see that stated in the '460, but I think that's part of what a POSITA would understand. 11:27:25 11:27:26 11:27:28 11:27:30

Q. Okay. I think you're right on that one. 11:27:32 11:27:33

I want to ask you, though, about this -- Claim 2 says that it's a -- the method of Claim 1 further comprising this authenticating a user. 11:27:36 11:27:38 11:27:42 11:27:46

Do you understand whether or not that's an additional step to Claim 1? 11:27:48 11:27:50

A. Yeah. I understand that that narrows the -- narrows Claim 1 by a bit to include all the steps of Claim 1 in the method. 11:27:54 11:27:57 11:28:02 11:28:06

Q. Uh-huh. 11:28:07

A. But then also having to authenticate the user of the access device. 11:28:07 11:28:11

Q. Okay. So would authenticating a user of the access device be separate -- a separate step from applying a security policy to the access device that's in Claim 1? 11:28:13 11:28:20 11:28:24 11:28:26 11:28:30

MR. BORDER: Objection. Form. 11:28:32

THE WITNESS: Well, Claim 2 doesn't tie the authenticating a user device of the access device to any particular security policy. 11:28:49 11:28:51 11:28:54 11:28:56

BY MR. KUO: 11:28:57

Q. Uh-huh. 11:28:57

A. But I think if you look at Claim 1, where you apply a security policy to the access device in response to the request, one example given in this column is that the security policy is one that requires a user of the access device to provide a username and password. But it's not limited. It could include other things, such as authenticating a device itself. 11:28:57 11:29:00 11:29:09 11:29:12 11:29:15 11:29:21 11:29:24 11:29:27 11:29:29 11:29:32

And it can go beyond -- and 11:29:32

Claim 2 doesn't tie security policy to -- it doesn't say that authenticating a user of the access device is part of said security policy. It just leaves it separate. 11:29:35 11:29:38 11:29:40 11:29:43 11:29:46

So it's an additional step that narrows Claim 1 by further requiring authenticating a user of the access device. But it doesn't do that in a way that -- that ties it to the security policy, even though the specification talks about it in such a way at one point. But the claim doesn't require that to be part of a security policy. 11:29:46 11:29:48 11:29:52 11:29:55 11:30:02 11:30:04 11:30:06 11:30:08 11:30:11

And furthermore, security policy wouldn't only mean authenticating a user of an access device. There are other things that could be included in security policies. And that would meet security policy. 11:30:12 11:30:15 11:30:18 11:30:20 11:30:28 11:30:31

Q. When you say that there's other things like the security policy, are you talking about security policy in general or security policy of the access device? 11:30:35 11:30:37 11:30:40 11:30:42

A. Well, if you look at Claim 5 -- 11:30:44

Q. Uh-huh. 11:31:50

A. -- it talks about how applying the security policy includes using the system data to determine that the access device satisfies the requirements of the security policy. 11:31:50 11:31:52 11:31:54 11:31:58 11:31:59

So now it's actually saying that that security policy is -- you know, of Claim 1, because it's applying the security policy, referring to a security policy in Claim 1, that includes using system data. 11:32:01 11:32:04 11:32:09 11:32:12 11:32:15

Q. Uh-huh. 11:32:25

A. And system data is broader than just username and password because it can include other things, such as what's the MAC address of the device, maybe -- IP address, other things that are related to the system that are not tied to a specific user of the device. 11:32:25 11:32:29 11:32:32 11:32:35 11:32:37 11:32:39 11:32:43

And so -- so if you look at that, you know, security policy can definitely include these other types of system data -- or wouldn't -- wouldn't be limited to only being username and password information. 11:32:45 11:32:50 11:32:52 11:32:57 11:32:59

That is, the system data would 11:33:20

not be limited to only being limited to information such as username and password because there's a lot of other data about the system, like the MAC address of the system or the IP address or other things that are not tied to the username and password. 11:33:26 11:33:30 11:33:33 11:33:34 11:33:38 11:33:41 11:33:45

Q. I want to -- I want to understand your answer. I think I -- I think I understand, but I just want to clarify. 11:33:46 11:34:05 11:34:09

So you're saying that in Claim 1 it talks about security policy, and then in Claim 5 -- I'm sorry, actually in Claim -- well, you talk about Claim 5 and the system data and where applying the security policy includes the system data. 11:34:10 11:34:14 11:34:17 11:34:29 11:34:32 11:34:38

So you're saying system data is -- you're saying security policy is broader than system data? 11:34:39 11:34:40 11:34:44

MR. BORDER: Objection. Form. 11:34:50

THE WITNESS: I don't think I -- well, part of what I'm trying to say here, Claim 2 and 5, they both depend from Claim 1. And the authenticating use of access device is an additional 11:34:50 11:34:54 11:34:56 11:34:59 11:35:01

step that's required, but it's not specifically tied to the security policy.

But Claim 5 talks about a security policy, the same security policy, and it talks about how applying the security policy includes using the system data.

And the system data is -- the system data obtained from access device, which is -- well, it's -- earlier in Claim 5, it talks about an agent executing on the access device to obtain system data from the access device. So that's the system data.

And there's -- there's not a limitation somehow on security policy in Claim 2 and Claim 5 because they're both dependent from Claim 1. And we also know that authenticating a user of the access device isn't specifically tied to the security policy in Claim 1.

But then in Claim 5, what is tied to the security policy is that the security policy -- where applying the

security policy includes using the system data to determine that the access device satisfies the requirements of the security policy. 11:36:06 11:36:08 11:36:11 11:36:13

And so that system data there is not limited somehow by Claim 2, which doesn't talk about the security policy, but is a separate step, because you asked me about that earlier. 11:36:14 11:36:19 11:36:21 11:36:25 11:36:27

BY MR. KUO: 11:36:28

Q. Uh-huh. 11:36:28

A. It's a separate authenticating user step. And while user information and password could be part of a system data, it's not the only thing that a person of ordinary skill would understand when they look at system data because system data is broader. 11:36:28 11:36:30 11:36:37 11:36:39 11:36:41 11:36:43 11:36:45

It includes lots of other data about the system, such as perhaps its MAC address or its IP address or some machine certificate, for example. 11:36:45 11:36:47 11:36:50 11:36:55

So security policy or a system data wouldn't be understood by a POSITA to be very narrow in the sense that it's only 11:36:57 11:37:04 11:37:07

about user information and their passwords. There's lots of data that could be system data, and Claim 5 doesn't narrow system data somehow to the context of Claim 2, which is about authenticating user, but it's not tied to the security policy.

Q. Right. So system data is related to the information about the device, right?

A. Well, it's information about the system, which is what the agent is collecting from the access device.

Q. Okay.

A. So it's collected from the agent access device by the agent, and then the security policy applies to that data generally that can be collected or retained from access device, which includes things like its MAC address, its IP address, which are things that are not specifically tied to username or password.

Q. Right. Because username and password, that's user specific, not device specific?

A. Sure. You can think of it that

way. I can't think of anything -- 11:38:18

Q. So, like, just for example, if I were to log on to my Google account from my phone, my username and password, or whatever they are, and I'm not going to put it on the record, just for -- and my -- but I could also log into my Gmail account from -- my Google account from my laptop, and it's the same username and password, but a different device? 11:38:20 11:38:25 11:38:28 11:38:33 11:38:35 11:38:39 11:38:43 11:38:45 11:38:47

A. Well, on my phone, I actually have different user names and passwords attached to my Google device. I have different Google accounts. 11:38:49 11:38:52 11:38:55 11:38:58

Q. Yeah, I don't. 11:39:00

A. So I do. And certainly, if you're using, like, a shared computer, you know, or a workstation, actually where people could be logged into the same device simultaneously, there's system information which is separate from user password. 11:39:00 11:39:02 11:39:03 11:39:04 11:39:07 11:39:10

Q. Exactly. That's my point. 11:39:13

A. Yeah, so, sure. I -- there's system data independent from user-specific passwords and user names. 11:39:15 11:39:18 11:39:23

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Q. Okay. 11:39:25

A. Like -- sorry. Sorry. **11:39:27**

Q. Go ahead. 11:39:30

A. Like my phone, if I wipe it and sell it and someone else takes it over, it may have the same identifiers in the hardware, same addresses, but now some new user is now going to be using it. **11:39:31 11:39:32 11:39:34 11:39:37 11:39:40**

Q. Exactly. Right. Right. 11:39:42

Okay. Let's go to -- you talked about this earlier, and I just want to confirm something. And I'll point you to where in your declaration. 11:39:45 11:40:01 11:40:03 11:40:09

In your declaration at paragraph 30, you have September 24, 2003, as an effective filing date. And that's an assumption that you've made, correct? 11:40:10 11:40:11 11:40:18 11:40:21

A. That's what I was asked to assume. **11:40:22 11:40:24**

Q. Right. 11:40:25

A. But I have no position on that issue. **11:40:25 11:40:26**

Q. Okay. I had a question about paragraph 31. 11:40:26 11:40:35

You state that you've reviewed 11:40:38

the file history of the '460 patent, including that of U.S. Patent Number 7,523,484, to which the '460 patent claims priority, "And note that none of the activity there is pertinent to my analysis." 11:40:39 11:40:41 11:40:43 11:40:49 11:40:52 11:40:53

My question is about that last part, where you say, "And note that none of the activity there is pertinent to my analysis." I assume by "there," you're referring to the '484 prosecution history. Is that right? 11:40:56 11:40:58 11:41:01 11:41:02 11:41:05 11:41:08

A. Yes. And generally, the file histories. **11:41:09 11:41:12**

Q. What do you mean by none of the activity in the '484 prosecution history is pertinent to your analysis? 11:41:15 11:41:17 11:41:21

A. What I mean is that sometimes people may say something in the prosecution history in an office action reply that seeks to clarify certain issues, but I don't recall seeing anything that would affect how I applied my mappings and my analysis. **11:41:22 11:41:24 11:41:27 11:41:30 11:41:32 11:41:34 11:41:41**

Q. Okay. Can we -- can you pull out 11:41:42

the '460 patent, please? 11:41:57

A. Sure. **11:42:01**

Q. And take a look at page 3 of it, 11:42:02

Figure 1. 11:42:08

A. Okay. **11:42:14**

Q. And it's -- it says, "Figure 1, 11:42:15

prior art," right? 11:42:19

A. Yes. **11:42:21**

Q. And the network that's being 11:42:21

discussed is indicated as 100? 11:42:32

A. Well, the specification talks **11:42:48**

about it in Column 1 -- **11:43:10**

Q. Uh-huh. 11:43:11

A. -- line 61, starting there. **11:43:11**

It says, "Figure 1 is a block **11:43:17**

diagram of a secure network generally **11:43:20**

designated 100." **11:43:21**

And it goes on to say, "Secure **11:43:25**

network 100 further includes, as an **11:43:29**

illustrative example, a network file **11:43:33**

server," and it goes on. **11:43:36**

But that's -- that's what it's **11:43:38**

pointing to as 100. **11:43:40**

Q. Right. 100 is what's referred to 11:43:43

in the specification as a secured network 11:43:46

or security network, right? 11:43:50

A. Yes. **11:43:52**

Q. And in this depiction of prior art, we have access devices, at least three of them shown. They're all indicated as 160, right? 11:43:52 11:43:57 11:44:01 11:44:03

A. Yes. **11:44:05**

Q. And each of the access devices has to go through an access point, correct? 11:44:07 11:44:08

A. That's what this figure shows. **11:44:12**

Q. Right. And then the access point goes to a gatekeeper, correct? 11:44:15 11:44:17

A. Yeah. There's a gatekeeper as part of each access point in this figure. **11:44:20 11:44:22**

Q. Right. And in the prior art, it was necessary to go through each gatekeeper before getting to the -- into the restricted parts of the network, correct? 11:44:25 11:44:29 11:44:32 11:44:44

A. I mean, I think if you look at Column 2, it does talk about this right at the top. **11:44:47 11:44:49 11:44:53**

Q. Uh-huh. 11:44:53

A. "Each instance of access point 120 may include a large number of individual communications ports -- **11:44:53 11:44:55 11:44:57**

communication ports. These ports are used to connect through gatekeeper 110 to other elements within secure network 100, such as file..."

So it goes on, but it is describing the prior art as the communications and the ports connecting through the gatekeepers 110, and that's what the figure shows.

Q. Okay. And then if you could turn to Figure 2.

A. Okay.

Q. Do you understand Figure 2 to be a preferred embodiment of the invention from the '460?

A. I'm just taking a quick look. I don't see it calling Figure 2 as a preferred embodiment. It's just according to various embodiments of the invention in Column 5, line 4 to 5.

And then at line 55 of Column 5, it talks about Figure 12 is a block diagram of a protected network 200 according to various embodiments of the invention.

I mean, it -- I don't -- I don't

have this memorized as to if it calls it a preferred embodiment.

Q. Let's take the word "preferred" out of my question, then.

Would you agree that Figure 2 is described as an embodiment of the invention?

A. Sure.

Q. And in Figure 2, again, we have access devices. They're labeled here as 230, right?

A. Yes.

Q. And the access devices hit an access point first?

Oh, I'm sorry. Strike that.

Before we get to that question, and in Figure 2, the protected network, there's an actual label that says "protected network 200" at the top, right, of the figure?

A. Yes.

Q. And is it your understanding that the protected network is everything shown in that outermost box?

A. Sure. I wouldn't dispute that

for this example figure. **11:47:33**

Q. Okay. So the access devices, first, any data coming from the access device first hits the access point, right? 11:47:35 11:47:43 11:47:45

MR. BORDER: Objection. Form. 11:47:57

THE WITNESS: Well, if you consider there's a link, it's going through the link to -- you know, to get to an access point. 11:48:09 11:48:10 11:48:12 11:48:15

But, sure, I think that that's where the data would come into the protected network at that boundary. 11:48:16 11:48:18 11:48:20

BY MR. KUO: 11:48:22

Q. Okay. And then it goes from the access point to the router? 11:48:23 11:48:24

A. I think that's what this example figure is showing. **11:48:27 11:48:30**

Q. What's the difference between an access point and a router, to your understanding? 11:48:30 11:48:32 11:48:37

A. Well, I mean, they're depicted separately here, but I think generally speaking, a router would be a device that actually can choose among one of multiple output paths for data. This really doesn't **11:48:37 11:50:52 11:50:55 11:50:59 11:51:06**

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indicate that there's more than one. **11:51:08**
I mean, implicitly, there's a **11:51:13**
path from the router to the access point as **11:51:14**
well. But an access point is simply **11:51:17**
providing access, but oftentimes they're -- **11:51:22**
they can be put together when there are **11:51:28**
multiple ports available. **11:51:31**
But, you know, I think a router **11:51:38**
is something that typically determines **11:51:41**
which of a number of different paths to use **11:51:45**
for data. **11:51:49**
Q. Okay. So my question was: Is 11:51:49
there -- and I'm not sure you answered this 11:52:17
question -- there a difference between an 11:52:18
access point and a router? 11:52:22
MR. BORDER: Objection. Form. 11:52:27
Outside the scope. 11:52:28
THE WITNESS: Well, I mean, an 11:52:28
access point doesn't necessarily have 11:52:32
to provide the same functions as a 11:52:33
router provides. 11:52:35
BY MR. KUO: 11:52:36
Q. What functions does a router 11:52:37
provide? 11:52:38
A. A router generally provides the **11:52:38**

ability to forward data out one of a number of different output ports and be able to decide which is the most appropriate port to forward data along.

Q. And how does a router make that decision?

MR. BORDER: Objection. Outside the scope.

THE WITNESS: Well, I mean, generally speaking, routers can have things like forwarding cables, like Ethernet switches can that map, prefix -- so say it's an IP router --

BY MR. KUO:

Q. Uh-huh.

A. -- and a forwarding cable or router may have a longest prefix match table. It's a little more complicated than a forwarding table, because it also includes length of prefix information.

And a router for IP routing does a lookup that includes determining the longest prefix match for an output forwarding path, where matches with shorter prefixes may go out a different path.

So the router for IP, for example, has a more complicated process to look up the output port when routing on IP addresses. 11:53:49 11:53:53 11:53:56 11:53:59

Q. And so how the router directs data to go -- directs where data is to go depends on how it's configured? 11:53:59 11:54:02 11:54:06

MR. BORDER: Objection. Form. Foundation. 11:54:08 11:54:11

THE WITNESS: I think it depends on a lot of information; depending what type of router, whether it's a core router, edge router. It can be based more on just its internal configuration, but based on routing updates that they receive from other neighbor routers. 11:54:11 11:54:20 11:54:22 11:54:24 11:54:31 11:54:34 11:54:35 11:54:39

BY MR. KUO: 11:54:39

Q. Okay. So -- 11:54:40

A. If there are any, I guess. 11:54:41

Q. So the router at one point in time will direct data to however it's been configured, but then it can be updated from external devices? Is that what you're saying? 11:54:42 11:54:44 11:54:46 11:54:51 11:54:52

A. Sometimes routing has, depending on what protocols a router might implement, can update forwarding table information based on routing updates received from other entities near neighbors or other entities. 11:54:55 11:54:57 11:55:00 11:55:02 11:55:04 11:55:08

Q. Okay. So that makes an actual change to the configuration of the router? 11:55:09 11:55:10

A. I mean, if you forward the forwarding table as part of this configuration, sure. And -- yeah, and it can be manually updated as well. 11:55:14 11:55:20 11:55:21 11:55:25

Q. Manually updated, is that what you said? 11:55:27 11:55:30

A. Yes. 11:55:30

Q. So keep Figure 2 with you, and then if you could turn to page 20 of your report -- I'm sorry -- of your declaration. 11:55:30 11:55:38 11:55:42

A. Okay. 11:55:47

Q. So you've drawn a -- at least in the colored version, a red dashed rectangle around portions of the -- of Figure 2, correct? That's an annotation you added? 11:55:48 11:55:55 11:55:59 11:56:07

A. Sure. 11:56:09

Q. And you labeled it as protected 11:56:13

network; is that right? 11:56:19

A. Yes. **11:56:20**

Q. Why did you feel it necessary to draw that rectangle and label it protected network when there was already a rectangle and a label protected network. 11:56:20 11:56:26 11:56:29 11:56:33

(Pause for reading/reviewing.) 11:58:16

A. Well, I mean, maybe -- I mean, as I discuss in paragraph 34, the protected network is ascribed in the '460 patent as either physically or logically divided into a restricted subset and a less-restricted subset. So I'm just pointing out that those are the two portions that the protected network is divided into as indicated in the figure. And the router and access point are simply at the edge. **11:58:26 11:58:32 11:58:37 11:58:40 11:58:43 11:58:47 11:58:47 11:58:48 11:58:51 11:58:53 11:58:56**

Q. Okay. So you're not saying that the router and access point are somehow outside the protected network, are you? 11:58:58 11:59:00 11:59:06

A. Well, I mean, the patent itself talks about how -- and this is Column 6 -- **11:59:12 11:59:14**

Q. Uh-huh. 11:59:16

A. -- at line 35. **11:59:17**

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That router 220 and access point 215 may be considered part of restricted subset 205 or less-restricted subset 210, and the figure shows clearly that they're not part of either.

So I think it's understood that, you know, there's many options as to what the router and access point can be considered part of.

And since the protected network comprises just -- well, it also explains that the protected network is physically or logically divided into a less-restricted subset -- into a restricted subset 205 and a less-restricted subset 210, just pointing out that, you know, maybe router and access point aren't part of either and are just at the edge.

Q. You're not saying that the protected network is limited to the two subparts, the restricted and the less restricted, are you?

A. Yeah, I mean, if you look at Figure -- so I didn't mean to say "yeah."

But if you look at what I've

cited to in Column 558 -- 55 to 58, it is -- it is saying that, which is that the protected network is either physically or logically divided into a -- into a restricted subset and a less-restricted subset, and that, furthermore, it goes on to say at line 59, "Access to protected network 200 is possible through an access point 215 and an optional router 220." 12:00:41 12:00:45 12:00:48 12:00:50 12:00:54 12:00:56 12:00:58 12:01:01 12:01:03

And so if -- it's at the boundary. I'm kind of pointing out that's the boundary. If it's in the protected network, then you can't get to the access point for it to control the access to the protected network. 12:01:07 12:01:13 12:01:16 12:01:18 12:01:20 12:01:22

So it's simply at the boundary. And it could be part of the restricted or the less-restricted as something that's on the edge of those networks. 12:01:23 12:01:24 12:01:29 12:01:31

Q. Also in your -- in your annotated version of Figure 2, you have -- you have -- you've colored the box gatekeeper 225 as gray, right? 12:01:34 12:01:40 12:01:47 12:01:50

A. Yes. 12:01:53

Q. And then to the right of it, you 12:01:54

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added the legend "Gatekeeper" as well, right? 12:01:57 12:02:02

A. Yes. **12:02:02**

Q. Why did you add that legend? 12:02:02

A. I think it's just indicating that the gray color is -- is what I -- color I'm using for the gatekeeper. **12:02:06 12:02:08 12:02:13**

Q. Okay. You're not saying that the gatekeeper is something other than what's shown? 12:02:14 12:02:15 12:02:17

A. Yeah. It's the gray box, but I've highlighted the text in gray to show that. **12:02:18 12:02:20 12:02:22**

Q. Got it. Understood. 12:02:22

A. I mean, same with access point and access devices. They're highlighted the color that I annotated the figure. Even though it seems a little repetitive, but it's just for clarity. **12:02:25 12:02:28 12:02:30 12:02:34 12:02:36**

Q. I didn't -- thank you. I understand. I didn't know if it was representative or there was some meaning behind it. But it was just for clarity? 12:02:38 12:02:43 12:02:44 12:02:47

A. Yes. **12:02:49**

Q. We talked a little bit earlier 12:03:12

about this applying -- applying the security policy that includes the system data. 12:03:14 12:03:20 12:03:24

Do you recall that from before? 12:03:27

A. Yes. **12:03:29**

Q. And in your reading of the '460 patent, do you agree that there was a differentiation between authorization and compliance with requirements for the device itself? 12:03:30 12:03:39 12:03:44 12:04:01 12:04:04

MR. BORDER: Objection. Form. 12:04:08

THE WITNESS: Where -- so with respect to the word "authorization," I'm not sure where I see that in the claims. 12:04:18 12:04:22 12:04:24 12:04:25

BY MR. KUO: 12:04:27

Q. I'm asking -- I'm just asking you about, in your reading of the '460 patent, do you -- strike that. 12:04:28 12:04:29 12:04:37

Go to Column 1 of the '460. 12:04:38

A. Okay. **12:04:48**

Q. Column 1, line 35, it states that "A first-level access control is achieved by requiring authentication of a user," and then, obviously, it continues on from 12:04:48 12:04:52 12:04:54 12:04:57

there, right? 12:04:59

A. Yes. **12:05:00**

Q. And then in the next paragraph, it talks about reliance on mere user authentication having disadvantages, right? 12:05:00 12:05:03 12:05:05

A. Yes. **12:05:09**

Q. And then it says that one of the disadvantages is that there are no provisions to assure that the access device meets network security policies, right? 12:05:09 12:05:12 12:05:14 12:05:18

A. Yes. **12:05:23**

Q. And then it talks about potential problems with that. It says it might have out-of-date virus software, it might have security vulnerabilities, or may otherwise be compromised, right? 12:05:23 12:05:26 12:05:28 12:05:31 12:05:33

A. Yes. **12:05:34**

Q. So is it your understanding, based on that discussion, that user authentication and compliance with -- and device compliance with a security policy are two different things? 12:05:35 12:05:37 12:05:41 12:05:49 12:05:51

MR. BORDER: Objection. Form. 12:05:52

THE WITNESS: Not necessarily. 12:05:54

But because if you look at Column 6 -- 12:06:25

we looked at this earlier, that it talks about how, at line 45, "In one embodiment, gatekeeper 225 is configured to enforce a security policy that requires a user of access device 230 to provide a username and password," and then, "Requires access device to be running on an operating system -- running an operating system with specific security patches installed." And it goes on. 12:06:27 12:06:29 12:06:34 12:06:37 12:06:39 12:06:41 12:06:44 12:06:48 12:06:50 12:06:53 12:06:54

And it even says that it requires that access device 230 have current antivirus software installed. 12:06:58 12:07:01 12:07:04

So the spec is giving an example where user authentication would be part of the security policy, but here I think what you're pointing me to may talk about them separately. 12:07:06 12:07:08 12:07:12 12:07:15 12:07:17

But it could -- that doesn't mean that they only can be separate from the security policy itself, because later on it talks about a security policy requiring a user of an access device to provide a username and password. 12:07:18 12:07:20 12:07:22 12:07:25 12:07:27 12:07:30

BY MR. KUO: 12:07:33

Q. Right. That's not -- that wasn't my question. My question was: When it talks about authentication, it's just asking the question, am I who I say I am, right? 12:07:33 12:07:34 12:07:38 12:07:41 12:07:46

MR. BORDER: Objection. Form. 12:07:46

THE WITNESS: That's an example of -- authentication and using a password and username -- 12:07:47 12:07:50 12:07:53

BY MR. KUO: 12:07:55

Q. Okay. 12:07:55

A. -- is one example that people use to show that. **12:07:55 12:07:56**

Q. And that's -- we talked about this earlier, that that relates to the user's credentials, right? 12:07:58 12:08:00 12:08:05

A. Sure. **12:08:09**

Q. And you gave the example of if you sold your phone and wiped it, the device credentials might still be the same, but some -- a different user would have different user ID and password, right? 12:08:09 12:08:11 12:08:13 12:08:15 12:08:17

A. Sure, at a different point. But there are some computer systems that allow **12:08:19 12:08:21**

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multiple users to log in, like a workstation, yeah. 12:08:23 12:08:25

Q. Sure. And then in the next -- in the second paragraph that we talked about from Column 1, where it talks about user authentication having disadvantages and then it says that the -- then it starts speaking about security policies specific to the device, right? 12:08:27 12:08:31 12:08:32 12:08:35 12:08:37 12:08:41 12:08:43

A. I'm sorry. Where does it say that again? 12:08:46 12:08:47

Q. It's in Column 1, starting at line 45. It doesn't say those words. I'm paraphrasing. This is what we just talked about, that what's talked about in lines 45 down to 56 is about the disadvantage of just using -- relying on user authentication and including an additional layer where the device configuration is taken into account, right? 12:08:48 12:08:51 12:08:54 12:08:55 12:09:00 12:09:05 12:09:08 12:09:10 12:09:18

A. Sure. I think it's a background describing the part that the inventor sees. But the inventor wasn't aware -- apparently wasn't aware of these other prior arts that I laid out in my declaration that is 12:09:20 12:09:22 12:09:25 12:09:28 12:09:30

already part of the prior art. 12:09:32

Q. Well, obviously, we're going to dispute that. But that's not my question. 12:09:37 12:09:38

My question is that this is -- this is what -- he is describing user authentication as one thing and device compliance checking as another, right? 12:09:40 12:09:42 12:09:46 12:09:52

MR. BORDER: Objection. Form. 12:09:53

THE WITNESS: I think what they're -- what the specification is saying here is that he's saying that just user authentication has disadvantages -- 12:09:56 12:09:57 12:10:00 12:10:02 12:10:05

BY MR. KUO: 12:10:06

Q. Uh-huh. 12:10:06

A. -- when allowing -- I guess as part of allowing these devices onto a network, which is, you know, you might not have the latest virus software, and user authentication doesn't tell you that, so you might want to have customers that use client devices that you allow into the network be patched with up-to-date latest security patches to have the most up-to-date security software. 12:10:06 12:10:08 12:10:11 12:10:13 12:10:17 12:10:18 12:10:23 12:10:25 12:10:28 12:10:32

And I think it's just saying that user authentication here doesn't tell you these other things, which would be beneficial. And I'm not gonna deny that. 12:10:34 12:10:35 12:10:37 12:10:39

Q. Okay. 12:10:43

A. Yeah. 12:10:43

Q. I'm happy to hear that. 12:10:44

Is this -- this notion of checking whether the -- I'm sorry. Strike that. 12:10:46 12:10:53 12:10:56

This concept of looking at the device and what software it may have, what patches it may have, is that referred to in the art as auditing? Is a way of referring to that called auditing a device? 12:10:56 12:11:02 12:11:10 12:11:15 12:11:17

A. Well, I have heard that term used before, but I think the specification talks about configuration data of a computer as -- as audit data, or includes that notion somewhere in the specification. 12:11:21 12:11:25 12:11:27 12:11:31 12:11:32

Q. Okay. 12:11:34

A. So I think, sure. I mean, if you wanted to see what virus softwares there are, you could do an audit of the software and determine what virus software is 12:11:35 12:11:38 12:11:40 12:11:42

running. **12:11:46**

So that word has been used, but **12:11:46**

audit data isn't limited to only that. **12:11:49**

Q. Is another way of describing -- 12:11:50

that's used in the art, a way of describing 12:11:54

how a device is -- as we talked about, the 12:11:57

kind of software that has patches and so 12:12:02

forth, is that sometimes referred to as 12:12:05

posture? 12:12:07

MR. BORDER: Objection. Form. 12:12:08

THE WITNESS: I don't think I 12:12:08

recall that being used in the 12:12:12

specification or using that word in my 12:12:14

declaration. But if it is, you could 12:12:16

point me there and I could -- 12:12:18

BY MR. KUO: 12:12:19

Q. No, I'm not asking you whether 12:12:20

it's in the declaration or in the spec. 12:12:21

I'm asking, have you heard that term, 12:12:23

"posture," "device posture," used in that 12:12:25

context? 12:12:29

A. That doesn't ring a bell to me. **12:12:30**

Q. Okay. 12:12:31

A. But I could have, but I just **12:12:32**

don't remember it. **12:12:34**

MR. KUO: Let's take a break. 12:12:58
(Whereupon, a recess was taken at 12:13:01
12:13 p.m.) 12:57:55
MR. KUO: All right. We can 12:57:55
start up again. 12:57:58
BY MR. KUO: 12:57:58
Q. We are back from break. So in 12:58:03
your declaration, this is at page 36 of 12:58:10
your dec, you say that Krantz or Krantz and 12:58:14
Herrmann render obvious claims, and then 12:58:17
you go on. 12:58:20
You don't have any opinion that 12:58:24
Krantz anticipates any claim, correct? 12:58:28
A. I think that's right. **12:58:33**
Q. And do you understand the 12:58:34
difference between anticipation and 12:58:36
obviousness? 12:58:40
A. Yes. I think I do. **12:58:40**
Q. Why did you opine only on 12:58:42
obviousness and not anticipation. 12:58:50
(Pause for reading/reviewing.) 12:59:42
A. Well, I think Herrmann is talking **01:00:17**
about techniques related to enforcing **01:00:19**
security policies and obtaining system data **01:00:21**
from an access device, which I think we **01:00:23**

were talking about earlier. **01:00:44**

And so it's -- it's a Krantz **01:00:48**

alone, like, single-reference obviousness **01:00:53**

or Krantz and Herrmann to the extent that **01:00:56**

it's -- it's necessary to -- that I believe **01:00:59**

that -- I probably did talk about some **01:01:03**

obviousness issues within Krantz. I just **01:01:08**

don't remember where. **01:01:11**

Q. Okay. So -- and I'm only talking 01:01:12

about your single reference to obviousness 01:01:16

with respect to Krantz. 01:01:18

A. Okay. **01:01:20**

Q. Because there would not be such a 01:01:20

thing as anticipation based on Krantz and 01:01:22

Herrmann. 01:01:24

With respect to your obviousness 01:01:25

opinion based on Krantz alone, what is it 01:01:33

in Krantz -- what claim limitation is 01:01:40

missing from Krantz that prevented you from 01:01:43

opining that it's anticipated? 01:01:51

A. Well, I mean, I'd have to look **01:01:54**

through it unless you want to direct me **01:01:56**

to -- **01:01:58**

Q. No. You can look through. 01:01:58

(Pause for reading/reviewing.) 01:02:00

BY MR. KUO: 01:10:03

Q. Dr. Houh, you can keep reading if you want, but maybe if I narrow my question a little bit to Claim 1. 01:10:03 01:10:06 01:10:11

A. Okay. **01:10:13**

Q. Are you in a position that you can answer my question with respect to Claim 1? 01:10:14 01:10:16 01:10:17

A. Sure, with respect to Claim 1. **01:10:18**

Q. Okay. Sure. 01:10:19

A. I can try to do that now. **01:10:20**

Q. Sure. So my question was and is: With respect to Claim 1, you have an obviousness opinion based on Krantz alone. What claim limitation is missing -- what claim limitation from Claim 1 is not in Krantz? 01:10:23 01:10:26 01:10:29 01:10:31 01:10:36 01:10:38

MR. BORDER: Objection. Form. 01:10:39

THE WITNESS: So I just want to talk about part of my analysis for 1.3 because I have, I think, three sets of analysis here. 01:10:41 01:10:44 01:10:47 01:10:49

BY MR. KUO: 01:10:50

Q. It's the one with three different mappings. 01:10:50 01:10:52

A. I think I go first, second, third. But maybe you call it that. I think the PTAB did consider it three mappings. 01:10:53 01:10:56 01:10:59 01:11:05

Q. Could you point me to where? 01:11:05

A. Sure. I'm on page 52. 01:11:07

Q. Sure. 01:11:10

A. So the first mapping talks about how the access point can be wired, and I talk about how the access point is -- the port is configured for communicating between the devices. 01:11:10 01:11:13 01:11:16 01:11:23 01:11:25

Q. Uh-huh. 01:11:26

A. And then if you look down on page 56, this is kind of a -- you know, to the extent that it's not disclosed expressly that the communication port configured for communicating between the access device and a restricted subset of a protected network. 01:11:26 01:11:33 01:11:36 01:11:37 01:11:40 01:11:42 01:11:45

For this first mapping, I think what I'm saying here is that to the extent it's not the communication port, it would have been obvious to implement it that way because, you know, I talk about that in 01:11:46 01:11:48 01:11:49 01:11:51 01:11:58

paragraphs 100 and 101 and through to the end of the section, which is through paragraph 109, I think. 01:12:00 01:12:06 01:12:15

Q. So why did you think that it was a possibility that one may assert that Krantz doesn't expressly disclose a claim communication port configured for communicating between the access device and a restricted subset of the protected network? 01:12:16 01:12:19 01:12:24 01:12:26 01:12:27 01:12:34 01:12:36

A. Well, I think maybe what the PTAB may have missed in explaining that they didn't think the first one was there was that they missed the obviousness discussion at the end of that section. 01:12:36 01:12:39 01:12:41 01:12:43 01:12:46

Q. No. I'm sorry. Let me back up. 01:12:47

You wrote -- you wrote this declaration before the PTAB got involved, right? 01:12:49 01:12:52 01:12:57

A. Yes. But now I have -- I have reviewed the institution decision, and I can see what they -- what I think they might have missed. 01:12:57 01:12:58 01:13:01 01:13:02

Q. But my question is: Why did you think it was a possibility that one may 01:13:03 01:13:07

assert that Krantz does not expressly disclose the claimed communication port configured for communicating between the access device and a restricted subset of the protected network? 01:13:09 01:13:11 01:13:13 01:13:15 01:13:18

A. Well, I think it does in the second mapping, and I think, you know, I looked at -- if you look at the second mapping, I talk about how it does. **01:13:18 01:13:22 01:13:24 01:13:25**

But with respect to the first mapping, you know, I don't talk about the express disclosure of which -- which element is configured to do that, but I discuss that later in the obviousness analysis at the end of the three sections, how it would have been obvious to have the communication port be configured. So starting at paragraph around 100. **01:13:27 01:13:28 01:13:33 01:13:35 01:13:37 01:13:39 01:13:41 01:13:44 01:13:46**

And so I think -- I think the -- the obviousness was kind of an issue with respect to at least the first mapping from paragraph 95 and 96, I think. **01:13:48 01:13:53 01:13:57 01:14:00**

The second mapping I think is very clearly disclosed that it's actually the communication port. **01:14:02 01:14:04 01:14:05**

And so I think it was -- I think for at least this element, even though I do think that it was disclosed, there was, you know -- to the extent that it's not, then I have this obviousness mapping, which I think applies at least to the first mapping in paragraphs 95 and 96.

Q. So is it your opinion that Krantz actually does disclose this limitation, but then you have alternate -- alternative arguments for why -- alternative mappings?

A. Well, there are alternative mappings, but the obviousness at the end of the section, maybe it could have been part of the first element, I think, because it clearly applies to say that, you know, you can combine elements together and it would be the port.

And -- well, I'll refer you to 100 right there. But I think it would have been obvious still, and that's still my position. My opinions haven't changed.

But I do think that the PTAB might have missed the obviousness discussion that was bundled at the end, but

they did -- I think they did agree that with respect to the second mapping, it's disclosed. 01:15:22 01:15:24 01:15:26

Q. Dr. Houh, I'm not asking about obviousness. I'm asking about an actual disclosure in Krantz. 01:15:26 01:15:28 01:15:32

That's the analysis one would do for anticipation. You understand that, right? 01:15:34 01:15:36 01:15:39

A. Yeah, I think there's different levels of -- I think expressly disclosed would be the analysis in -- for anticipation for every element needs to be expressly disclosed. 01:15:39 01:15:41 01:15:46 01:15:49 01:15:51

Q. Okay. So the reason you went with obviousness -- correct me if I'm wrong. But the reason you went with obviousness is that this limitation, at least according to this first mapping, is not expressly disclosed in Krantz? 01:15:53 01:15:55 01:15:57 01:15:59 01:16:01 01:16:03

MR. BORDER: Objection. Foundation. 01:16:05 01:16:06

THE WITNESS: So I think it was disclosed, but it's certainly obvious to the extent it's not. So -- but I 01:16:06 01:16:11 01:16:13

think it was at least obvious, even the first element combined with the obviousness analysis, the first mapping. And because -- that's my position is that it's -- there's not an anticipation -- 01:16:16 01:16:18 01:16:19 01:16:22 01:16:27 01:16:30

BY MR. KUO: 01:16:30

Q. Okay. 01:16:30

A. -- a single reference of anticipation here. 01:16:30 01:16:32

Q. Okay. Were there other elements -- I'm sorry. 01:16:35 01:16:36

Were there other limitations from Claim 1 that you also relied on obviousness because there's some lack of expressed disclosure in Krantz? 01:16:38 01:16:39 01:16:42 01:16:44

A. I'm not saying there's always a lack of expressed disclosure. It's just that perhaps in some of the alternative mappings, there may have been. 01:16:45 01:16:48 01:16:50 01:16:52

So I'm not really saying that there is definitely something that was not expressly disclosed anywhere. But I think I did see another discussion of that around paragraph 131, which pertains to element 01:16:53 01:16:55 01:16:57 01:17:00 01:17:04

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1.5. It also has the same reconfiguring in the first three elements. **01:17:20 01:17:24**

Actually, I can't remember if -- if it's 1.3 or 1.5 being discussed in the institution decision, but I think there's three mappings in 1.5 as well. **01:17:25 01:17:27 01:17:30 01:17:32**

And I think it's at least obvious even with the first mapping, given the discussion of the obviousness at the bundle at the end of that section, which is starting around page -- paragraph 131 to 133. And it's a very similar discussion as to back in paragraph 100. **01:17:40 01:17:43 01:17:45 01:17:47 01:17:53 01:18:00 01:18:03**

Q. So you used the phrase "at least obvious" a few times, and I just want to confirm, you are not offering an opinion with respect to anticipation, right? 01:18:06 01:18:09 01:18:17 01:18:19

A. Yeah, I think that's correct. **01:18:21**

Q. Right. So it's only obviousness? 01:18:24

A. Sure. I believe that's right. **01:18:28**

Q. So why did you caveat it with "at least obvious"? 01:18:29 01:18:32

A. Because that's at least the minimum of what I'm saying is it's at least obvious. It's obvious. **01:18:33 01:18:35 01:18:38**

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Q. What would be more than at least obvious? 01:18:39 01:18:41

A. Well, my point is that there wasn't obviousness discussion that -- that discussed after the -- three mappings in both those sections for 1.3 and 1.5. 01:18:41 01:18:49 01:18:52 01:18:54

And to the extent the PTAB was looking at the full disclosure of just the first mapping, I think they may have missed the discussion about obviousness. 01:18:58 01:18:59 01:19:02 01:19:05

And my point is that I wasn't -- I'm not asserting that -- under the first mapping, I mean, I think it's disclosed. 01:19:07 01:19:10 01:19:14

But whether it's disclosed as with an obvious knowledge or the knowledge of a person of ordinary skill or expressly using the words, I think that's why I'm saying it's more obvious, because it doesn't say the exact -- although a person of ordinary skill would have understood that that was what it's teaching, especially in light of, you know, certain positions, like there's only a finite number of devices that you could do this on. 01:19:18 01:19:19 01:19:21 01:19:24 01:19:28 01:19:30 01:19:35 01:19:36 01:19:39 01:19:41 01:19:43 01:19:44

Q. My question isn't quite as complex as I think you're making it. 01:19:45 01:19:47

My question simply is -- I just want to be clear on what your opinions are, and somewhere in there I think it is, but I just want to confirm that you have obviousness as an option, you have anticipation as an option for -- for the participant challenge here. Correct? 01:19:49 01:19:52 01:19:56 01:19:58 01:20:02 01:20:05 01:20:10

A. (No audible response.) **01:20:12**

Q. And it is not your opinion that all of the limitations in Claim 1 are met by Krantz via anticipation, correct? 01:20:12 01:20:15 01:20:20

A. Yeah, I'm not asserting an anticipation reference for just Krantz alone. **01:20:25 01:20:27 01:20:30**

Q. Okay. 01:20:30

A. A challenge, that is an anticipation challenge. **01:20:30 01:20:32**

Q. Let's go to -- let's go to, since you're actually kind of close to it, page 78. And it's paragraph -- well, it's not just paragraph 137. It starts on paragraph 137, and it goes through to paragraph 141. 01:20:33 01:20:38 01:20:40 01:20:42 01:20:45 01:20:50

A. Okay. **01:20:53**

Q. And here you say -- this relates to Claim 3, and Claim 3 says, "The method of Claim 1 further comprising obtaining system data from the access device and wherein applying the security policy includes using the system data to determine that the access device satisfies the requirements of the security policy." 01:20:53 01:20:56 01:21:01 01:21:04 01:21:07 01:21:09 01:21:12 01:21:15

And in your discussion with Claim 3, you start off in paragraph 137 with, "To the extent that Krantz does not expressly disclose" that limitation, "it would have been obvious in view of Herrmann," correct? 01:21:23 01:21:24 01:21:26 01:21:28 01:21:33 01:21:35

A. That's how it starts. **01:21:35**

Q. And just confirm for me that you have no opinion in this section that it would have been obvious that Claim 3, this additional limitation in Claim 3, would have been obvious in view of Krantz by itself? 01:21:36 01:21:39 01:21:44 01:21:48 01:21:50 01:21:52

A. I mean, I start out talking about why you combine Krantz with Herrmann, but I'm not -- I mean, I stand by what I say **01:21:56 01:22:52 01:22:57**

here; is that it's to the extent that Krantz does not expressly disclose this additional element listed in Claim 3, it's obvious in view of Herrmann.

Q. So you make no single obviousness assertion with respect to Krantz for Claim 3, correct?

A. I mean, I haven't laid out the Krantz-only set of paragraphs, but, I mean, to the extent it's not already laid out previously, what I'm saying is that to the extent it's not expressly disclosed in Krantz, it's obvious to combine with Herrmann.

So I am laying out in this section a combination analysis of Krantz and Herrmann.

Q. I understand that. You say, to the extent that it's not expressly disclosed in Krantz, that Claim 3 in combination with Herrmann would be obvious, correct?

A. Yeah.

Q. You do not make a claim that to the extent the limitations of Claim 3 are

not expressly disclosed in Krantz, that it would be obvious in view of Krantz alone, correct? 01:24:06 01:24:09 01:24:20

A. I don't think I have a section with respect to just that -- 01:24:20 01:24:22

Q. Thank you. 01:24:23

A. -- in the Claim 3 analysis. 01:24:27

Q. And the Claim 3 analysis -- is the reason that you rely on Herrmann because of this system data-related limitations? 01:24:28 01:24:32 01:24:35 01:24:41

A. Well, I do talk about how Herrmann discusses techniques for obtaining system data from an access device. 01:24:42 01:24:50 01:24:53

Q. Let me -- let me rephrase. 01:24:55

Is the reason that Krantz -- that you offer no opinion of Krantz by itself renders obvious this limitation in Claim 3, is it because of the system data-related limitations? 01:24:57 01:25:06 01:25:09 01:25:12 01:25:17

A. I think maybe for Claim 3, that's the main part of it, which, you know, Krantz is -- sorry, Herrmann is disclosing using an agent. 01:25:31 01:25:33 01:25:35 01:25:40

And there might be some other 01:25:41

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limitations that include the notion of an agent, but at least for this limitation, I think the main part of what I'm relying on Herrmann for is -- is for the techniques it teaches about obtaining system data from an access device. 01:25:43 01:25:45 01:25:47 01:25:52 01:25:54 01:25:56

Q. Okay. 01:25:57

A. I mean, my -- it is -- you know, my words are what I -- my declaration is my declaration, so I'll refer you to here, what I say. 01:25:58 01:26:01 01:26:03 01:26:05

But I think at least the main point that I'm -- one of the main points I'm making, at least in this section, is about -- about that notion of techniques for obtaining system data from an access device. 01:26:06 01:26:07 01:26:10 01:26:12 01:26:15 01:26:17

Q. And then the limitations of Claim 3 are also found in Claims 4 -- I'm sorry. It's also in Claim 4 by virtue of being dependent on Claim 3? 01:26:19 01:26:21 01:26:33 01:26:37

A. Yes. I would agree with that. 01:26:38

Q. And then in Claim 5, let's look at -- let's look at your report on Claim 5. It starts paragraph 148. 01:26:39 01:26:51 01:26:54

And Claim 5 says that "The method of Claim 1 further comprises of communicating between the gatekeeper and an agent executing on an access device to obtain system data from the access device," right? 01:27:01 01:27:03 01:27:05 01:27:07 01:27:10 01:27:15

A. Yes. **01:27:15**

Q. And then similar to with Claim 3 -- sorry. Are you okay? 01:27:16 01:27:20

A. I'm fine. Thank you. **01:27:21**

Q. You say Claim 5 is obvious over Krantz in view of the disclosures in Herrmann. 01:27:22 01:27:26 01:27:29

I just want to confirm that you do not have a single reference of obviousness contention based on Krantz with respect to Claim 5, correct? 01:27:30 01:27:32 01:27:36 01:27:42

A. I think that's correct. **01:27:43**

Q. And is the reason for it, again, because of -- at least because of this system data requirement? 01:27:48 01:27:51 01:27:52

A. For this claim, that's part of it. But it's also that for the agent disclosure as well. **01:27:54 01:27:56 01:27:59**

Q. Okay. And the limitations of 01:28:01

Claim 5 are also included by way of dependency in Claim 6 and 7; is that right? 01:28:03 01:28:08

A. Yes. **01:28:12**

Q. And then if you could turn to Claim 18. It's probably easier if you look at the patent itself; although, it is much smaller print, so that might be an issue. 01:28:16 01:28:24 01:28:36 01:28:43

A. Okay. 18. **01:28:47**

Q. Yeah. So in Claim 18, you can read it to yourself, but Claim 18, would you agree that that's similar as far as its limitations to Claim 3 and, in particular, the system data requirements? 01:28:49 01:28:51 01:28:54 01:29:00 01:29:04

A. Yeah. I mean, it looks similar, but this is a computer readable memory claim, as opposed to a method. **01:29:09 01:29:33 01:29:40**

Q. Right. And then this Claim 20, and I understand Claim 20 is also to computer-readable storage medium, but as far as the system data and agent, those limitations are similar to those in Claim 5? 01:29:42 01:29:47 01:29:50 01:29:53 01:29:58 01:30:01

A. Yes. **01:30:02**

Q. And so for the same reasons that you rely on Herrmann and not on Krantz 01:30:03 01:30:09

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alone is because of the system data for Claims 18 and 20 and the claims depending on them? 01:30:12 01:30:16 01:30:21

A. I mean, Claim 20 is also talking about the agent. **01:30:21 01:30:24**

Q. Correct. 01:30:25

(Pause in testimony.) 01:30:32

BY MR. KUO: 01:30:42

Q. So just to kind of tie this up, with respect to Claim 3 at least, and the claims that depend from Claim 3, the reason you rely on Herrmann is because of the system data requirements, correct? 01:31:20 01:31:23 01:31:26 01:31:28 01:31:30

A. I think that's the main point I talk about with respect to Herrmann. **01:31:34 01:31:36**

Q. And then with respect to Claim 5 and whatever claims are dependent from Claim 5, it's the system data requirements as well as the agent being the reason that you rely on Herrmann? 01:31:37 01:31:39 01:31:42 01:31:45 01:31:47

A. I think, certainly, Herrmann does disclose those; so... **01:31:49 01:31:51**

Q. But that's the reason you rely on Herrmann? 01:31:53 01:31:54

A. I think those are the main points **01:31:54**

there. **01:31:56**

Q. And then we talked about 18 and 3 being pretty much the same. So it would be the same answer for Claim 18 and the claims depending from there? 01:31:58 01:32:00 01:32:02 01:32:05

A. Sure. **01:32:06**

Q. And then the same for 20 as compared to 5? 01:32:06 01:32:08

A. Sure. **01:32:09**

Q. Okay. And I'm going to apologize right now for hopping around a little bit, but, you know, that's how I wrote my outline. 01:32:10 01:32:22 01:32:25 01:32:26

Can you turn to paragraph 52? 01:32:28

A. Okay. **01:32:42**

Q. I apologize. Let's look at Krantz. Sorry. 01:32:44 01:33:08

Are you with me? 01:33:20

A. Yeah. I have Krantz up. **01:33:21**

Q. Great. Thank you. 01:33:23

In paragraph 52 of Krantz, which is Exhibit 1005, it states that "Access to resources located on network 413 can be restricted by the use of virtual local area networks (VLANs)." 01:33:24 01:33:27 01:33:42 01:33:47 01:33:52

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Do you see where I'm reading? 01:33:57

A. Yes. **01:34:01**

Q. Can you explain what's meant by restricting use of resources by way of VLANs? 01:34:01 01:34:03 01:34:06

A. I think the paragraph itself talks about -- about how it does that. So, for example, it talks about how, in these embodiments -- **01:34:17 01:34:31 01:34:35 01:34:37**

Q. Uh-huh. 01:34:39

A. -- "Networks 411, 412 and 413 may each be a portion of a different VLAN, and VLAN aware devices in network -- in network architecture can tag data frames to indicate to data-routing device where the data frames are to be routed, for example, when client is not authorized to access resources located network 413." I'm omitting most of the labels, but here I think you need the network 413, and I think there's an "in" missing. "Components in network 411 are logical communications link. 433 can tag data frames from client 405, indicating that the data frames are to be routed to **01:34:39 01:34:43 01:34:46 01:34:50 01:34:52 01:34:56 01:34:59 01:35:01 01:35:07 01:35:09 01:35:12 01:35:14 01:35:16 01:35:19 01:35:22**

server 415 for other resources located on network 412." And it goes on to explain that there may be some servers the client is authorized to access the network for and components in the network that can tag the data to indicate that those data frames are to be routed to specific resource -- to resources on network 413 or to resources on network 412 as appropriate. So that's just indicating that that's what Krantz is teaching, is that the tagging -- the device that tags can do so and have the data frames routed to different networks as appropriate.

Q. So my question was about the "restricted by use of" portion of the sentence, and I think you've answered that. I just want to confirm.

The VLANs will let some data go to certain places and not to other places based on the tagging, correct?

A. Yeah. I mean, the tagging is to tag which -- which VLAN, and that frame should be routed through too. And so it's

the tagging process. I mean, the VLAN is the result of that, as opposed to the way you asked the question, which I think was a little -- it was how rather than the what. 01:37:06 01:37:12 01:37:16 01:37:17

Q. Okay. So the VLAN sees the client data with whatever tag it has and, based on how that VLAN is configured, sends it to its intended destination; is that right? 01:37:21 01:37:27 01:37:31 01:37:34 01:37:42

A. Well, I mean, the tag is used to indicate to the routing device where the data frames are to be routed. That's why Krantz is saying -- it says exactly that in the middle. 01:37:42 01:37:44 01:37:46 01:37:50 01:37:52

Q. Right. So the VLAN -- the VLAN has -- is configured in a way so if it sees this tag header from the client device, it sends the data to whichever VLAN it's configured to do so? 01:37:53 01:37:55 01:38:00 01:38:04 01:38:08

A. I mean, you're using VLAN in the first case in a really odd way. The data routing device is the routers that examine the tags that relate to which VLAN the data frame is destined for. 01:38:09 01:38:11 01:38:14 01:38:17 01:38:22

Q. Oh, okay. So I'm sorry. 01:38:24

The data routing device then reads the tag header in the -- in whatever client data is being sent and sends it off to whatever destination was intended, right? 01:38:27 01:38:30 01:38:35 01:38:39 01:38:44

A. Yeah. Whether it's network 413 or 412, it's indicated by the tag, which is applied, as I discuss in my declaration about how Krantz is -- what Krantz is teaching. **01:38:44 01:38:47 01:38:50 01:38:53 01:38:57**

Q. And we talked earlier about how routers direct the data, right? 01:38:57 01:38:59

A. Yes. There's an additional complication. The VLAN is used at -- to determine which -- which VLAN the data routing device should be the destination of the data frame. **01:39:02 01:39:05 01:39:10 01:39:13 01:39:19**

But VLANs can be spread out among multiple routers. That's why they're VLANs instead of LANs. **01:39:21 01:39:26 01:39:30**

Q. Okay. And the tag headers, this is data that is -- I'm sorry. 01:39:31 01:39:39

Is a tag header part of the data that is coming from the client? 01:39:42 01:39:46

A. I think I discuss this in my **01:39:48**

declaration. **01:39:58**

So one thing that Krantz **01:40:11**

complains -- **01:40:13**

Q. Can you point me to where you're 01:40:14

looking? 01:40:15

A. Oh, yes. On page 70, **01:40:15**

paragraph 123 is that access point 209 can **01:40:18**

be configured as a VLAN aware device and **01:40:21**

can insert tag headers to data frames **01:40:23**

received from the client or any other **01:40:26**

computer system on VLAN A to be transferred **01:40:27**

to VLAN B and/or VLAN C. **01:40:30**

And so that's -- that's what **01:40:35**

Krantz says, and I cite paragraph 64 in **01:40:37**

Krantz for that. **01:40:39**

Q. Right. So my question was: Is 01:40:40

the tag header that we've been talking 01:40:44

about part of the data that's being sent 01:40:46

from the client device? And I think the 01:40:48

answer to that is yes, based on what you 01:40:53

just read? 01:40:54

MR. BORDER: Objection. 01:40:56

Foundation. Form. 01:40:57

THE WITNESS: In this example, 01:40:57

it's not, because it's the access point 01:40:59

that's configured to insert the tag headers. That's what Krantz is teaching. 01:41:01 01:41:05 01:41:06

So, I mean, there may be other embodiments in Krantz that discuss other ways of tagging, but this embodiment that I'm referencing is one where it's the access point 209 that's configured to be aware of the virtual LANs and to insert the tag headers. 01:41:07 01:41:09 01:41:11 01:41:12 01:41:15 01:41:18 01:41:24

BY MR. KUO: 01:41:26

Q. Where is the tag header inserted? 01:41:26

A. It's inserted into the data frame. **01:41:28 01:41:30**

Q. Of -- from where? 01:41:30

A. Of the data it receives from the client. **01:41:32 01:41:36**

Q. Okay. And so if the -- in this case, if the access point inserts -- it could basically change the tag header for some client data? 01:41:36 01:41:43 01:41:49 01:41:57

A. Yeah. I'm saying this is what's disclosing the reconfiguration element here so that it can be reconfigured to now add a different tag or change the tag that's to **01:41:58 01:42:00 01:42:04 01:42:07**

be affixed to insert a tag that it can now go to VLAN B, and then you can change the -- reconfigure it so that the tag would -- a different tag indicating it would go to VLAN C. 01:42:10 01:42:13 01:42:16 01:42:19 01:42:21

So that's what Krantz is explaining is that it's the access point that is reconfiguring the communication port for 251 for communicating data between the access device and the less-restricted subset of the protected network. 01:42:23 01:42:27 01:42:29 01:42:31 01:42:36 01:42:38

Q. You said the access device -- I'm sorry. 01:42:39 01:42:41

You said the access point is reconfiguring the ports themselves? 01:42:41 01:42:44

A. Yes, because the access point -- it's the access point that is inserting -- that's what Krantz teaches in the one I cited, that it's citing to -- I cite to paragraph 64. 01:42:48 01:42:50 01:42:53 01:42:55 01:42:58

It's the access point that's configured to insert the tag headers and the data frames. That's -- that's almost exactly what Krantz is saying. 01:42:59 01:43:01 01:43:04 01:43:06

Q. Right. 01:43:08

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A. That is what Krantz is saying. 01:43:08

Q. And we talked about this already. The tag headers that are being inserted, those are in the data from the client device? 01:43:10 01:43:13 01:43:15 01:43:17

A. Yeah. The tag headers are inserted into the data frame. 01:43:18 01:43:19

Q. Okay. And depending on what tag header is in the data frame, that's how the router knows where to send that data packet? 01:43:20 01:43:25 01:43:27 01:43:30

A. That's what Krantz is teaching as one of -- one of the things, is that it's the access point that's configured to insert these tags and then can be reconfigured to insert a different tag for a different VLAN. And that's what Krantz is teaching. 01:43:30 01:43:32 01:43:34 01:43:36 01:43:39 01:43:41 01:43:43

Q. Where does Krantz actually teach that the access point configuration is changed? 01:43:44 01:43:57 01:44:01

A. If you look at paragraph 124, "Port 251 is reconfigured by access point 209 because it was previously tagging incoming data from client 205 with headers 01:44:03 01:44:18 01:44:22 01:44:24

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that enabled access to VLAN B," which is the restricted subset. 01:44:28 01:44:30

But then where it was previously inserting tag headers to assess VLAN C -- so that, put another way, access point 209 has reconfigured port 251 to tag incoming data for transfer to VLAN C rather than VLAN B. 01:44:32 01:44:38 01:44:42 01:44:44 01:44:47 01:44:50

Q. So are you saying that the access point itself has been reprogrammed? 01:44:57 01:44:59

A. I'm saying that access point is reconfiguring -- that Krantz is explaining that when configured as a VLAN aware device, Krantz's access point is reconfiguring the communication port that is port 251 of Krantz for communicating data between the access device and the less-restricted subset of a protected network. 01:45:09 01:45:11 01:45:15 01:45:18 01:45:20 01:45:23 01:45:26 01:45:29 01:45:33

And then where -- where -- if it was previously tagged with headers that enabled to VLAN C or the less-restricted subset, and it's now tagging them to VLAN C, the port -- that's how Krantz is disclosing reconfiguring the communication 01:45:33 01:45:39 01:45:42 01:45:47 01:45:49 01:45:53

port. **01:45:55**

Q. So let's suppose I have a mail distribution system. When I say "mail," I mean actual physical, documents, letters, right? 01:45:56 01:46:06 01:46:09 01:46:11

And it has a sensor that says things with a red stamp go to the left, things with a blue stamp go to the right, and so as mail comes in, it reads it, says, okay, red go one direction, blue go the other direction. 01:46:12 01:46:18 01:46:21 01:46:30 01:46:36 01:46:39

And if I change the stamp on a -- let's say a stamp -- let's say a piece of mail comes in. It's got no stamp, and it's not sure where to go. And it gets checked and it said, oh, this should have a red stamp, so we put a red stamp on it, and now it goes on to wherever the red ones go. 01:46:43 01:46:49 01:46:52 01:46:55 01:46:58 01:47:00 01:47:02

Is that -- in your mind, is that reconfiguring the router? 01:47:05 01:47:07

MR. BORDER: Objection. Form. Outside the scope. 01:47:10 01:47:11

THE WITNESS: I mean, that's a hypothetical. That's not -- Krantz doesn't say anything about red or blue 01:47:12 01:47:13 01:47:15

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stamps. 01:47:17
Krantz is teaching that -- 01:47:18
BY MR. KUO: 01:47:20
Q. I am asking you a hypothetical. 01:47:20
Can you answer that hypothetical? 01:47:21
MR. BORDER: Same objections. 01:47:23
THE WITNESS: I mean, that's not 01:47:24
a hypothetical that -- I'm analyzing 01:47:26
the actual Krantz and why it discloses 01:47:27
the -- its teaching -- 01:47:32
BY MR. KUO: 01:47:33
Q. Are you unable to answer my 01:47:33
hypothetical? 01:47:34
A. The hypothetical is not something 01:47:35
I looked at, especially with respect to red 01:47:38
stamps or blue stamps, in my declaration. 01:47:40
I actually looked at what 01:47:42
actually Krantz is teaching. 01:47:43
Q. Are you unable to answer my 01:47:44
hypothetical? 01:47:46
A. A hypothetical -- it's -- it's a 01:47:46
hypothetical right now. If you specify 01:47:49
fully enough, I might be able to think 01:47:52
about it. 01:47:54
But that's not the analysis I did 01:47:55

for my declaration, which was with respect to the actual teachings of Krantz itself, which teaches about how the access point can be configured as a VLAN aware device and insert tag headers in the data frames from client 205 to be transferred to VLAN B and/or C. And it talks about how the tags are what's used by the routing device to determine which network to forward it to.

And that Krantz talks about providing access to one network B or C and then the other network B or C, and that's why Krantz is teaching reconfiguring the access point and the port, communication port.

And I'm talking about the actual example and teachings of Krantz itself.

Q. So the answer to my question is, no, you can't answer my hypothetical?

MR. BORDER: Object to form.

THE WITNESS: If given enough specifications, I would be able to think about enough detail about the actual hypothetical.

But typically hypotheticals are

lacking in many respects, and so -- and it's not what I analyze. I analyze what Krantz is teaching, and Krantz doesn't teach some blue stamp or red stamp. 01:49:00 01:49:03 01:49:05 01:49:08 01:49:10

BY MR. KUO: 01:49:10

Q. So the answer to my question is, you can't answer my hypothetical? 01:49:10 01:49:12

MR. BORDER: Same objections. 01:49:14

THE WITNESS: If you specify it fully enough, I can try to answer a hypothetical. But I think it's pretty much underspecified right now. 01:49:15 01:49:16 01:49:18 01:49:19

BY MR. KUO: 01:49:21

Q. As my hypothetical is stated, you can't answer my hypothetical? 01:49:21 01:49:23

MR. BORDER: Object to form. 01:49:25

THE WITNESS: Your hypothetical is underspecified, and I'd need a lot more detail to think about this issue. 01:49:25 01:49:27 01:49:31

BY MR. KUO: 01:49:34

Q. The access point -- so in Krantz, a user wants to access, at least in the main embodiment, the Internet, correct? 01:49:40 01:49:48 01:49:54

MR. BORDER: Object to form. 01:50:05

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THE WITNESS: Is there something in Krantz here you're thinking of that you can direct me to, or do you want me to look through Krantz? 01:50:06 01:50:07 01:50:10 01:50:12

BY MR. KUO: 01:50:13

Q. Are you not familiar enough with Krantz to answer my question without reading the whole thing? 01:50:13 01:50:14 01:50:15

A. I don't have these references memorized, and I don't have a photographic memory. **01:50:16 01:50:19 01:50:21**

Q. All right. I think you're having a problem with the word "Internet," so I'll take that word out of my question. 01:50:22 01:50:54 01:50:57

In Krantz, a user wants to access a network, right? 01:51:00 01:51:04

MR. BORDER: Object to form. 01:51:07

THE WITNESS: I'm not seeing anything in Krantz -- I'm taking a look right now -- that talks about the desires of the user. It's simply what the system does. 01:51:09 01:51:44 01:51:46 01:51:48 01:51:51

BY MR. KUO: 01:51:55

Q. Okay. So the system allows a user to access a network, right, in Krantz? 01:51:56 01:51:58

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A. I mean, if you look at the brief summary of invention in paragraph 15, it talks about "The foregoing problems with the prior state of the art are overcome by the principles of the present invention, which are directed towards methods, systems, computer program products, and data structures for increasing the level of automation, then provisioning and configuring a computer system to access the network."

Q. So one of the goals of Krantz is to provide a system so a user can access a network, right?

MR. BORDER: Object to form.

THE WITNESS: Well, I mean, Krantz says what it says. I don't know if it says it exactly the way you said it, but I just read you the first paragraph of the brief summary of the invention.

BY MR. KUO:

Q. I appreciate that. Are you actually disputing that Krantz discloses a system so a user can access a network?

A. I know you're trying to re-characterize Krantz.

Q. I'm not. I'm just asking a very simple question.

A. Maybe that's something that happens, but it's -- Krantz is talking about programs, products, data structures for increasing the level automation when provisioning and configuring a computer system to access a network. That's one thing it's talking about.

I'm not sure it says it exactly the same way, but, sure, I mean, it says what it says. I'm not -- Krantz says what it says.

Q. In order to access a network, according to Krantz, one of the things that is required is user authentication, right?

A. Is there something specific in Krantz you want me to look at, or do you just want me to look through Krantz.

Q. Are you able to answer that question without looking through Krantz again?

A. I don't have these things

memorized. I'm not going to apologize for that. 01:55:06 01:55:08

Q. I know you don't. 01:55:08

A. If you want to refer me to something specific, please -- we could make this faster if you, like, pointed me directly to something you want me to answer about. 01:55:09 01:55:11 01:55:13 01:55:16 01:55:17

Q. If all I -- 01:55:17

A. If you're asking me about generalities, I'm going to take my time to look through it if that's what you want me to do. 01:55:17 01:55:18 01:55:20 01:55:22

Q. Then, fine, we'll ask about the generality. Go ahead, look at Krantz. 01:55:26 01:55:28

A. So can you repeat the question? 01:55:32

Q. Sure. In order to access a network, or according to Krantz, one of the things is required is user authentication? 01:55:33 01:55:39 01:55:42

(Pause for reading/reviewing.) 01:57:40

A. So Krantz gives a lot of different examples about the kind of credentials that need to be sent to the server. It talks about a client sending credentials, based on the credentials -- 01:57:40 01:57:41 01:57:43 01:57:46 01:57:48

I'm looking at paragraph 16, for example -- 01:57:50
"The server may authorize the client for at 01:57:54
least partial access to the second network 01:57:56
and/or may deny access to the second 01:57:58
network and authorize a client for at least 01:58:00
partial access to the first network." 01:58:03
Now, it does give an example in 01:58:05
another paragraph, like, for example, 01:58:07
paragraph 19 of an authenticated user, but 01:58:16
that's not -- these kind of authentications 01:58:21
aren't limited to only the type of user 01:58:25
authentication. 01:58:27
In fact, Krantz discloses 01:58:28
protocols that talk about various kinds of 01:58:33
machine certificates that can be submitted 01:58:37
as credentials, and certainly talks about 01:58:38
protocols which persons of ordinary skill 01:58:41
in the art can understand that these 01:58:47
protocols include authenticating the 01:58:51
systems themselves independent of users. 01:58:55
And certainly, there's another 01:58:57
thing that I recall from Krantz, which 01:59:02
talks about doing things before the user 01:59:04
will self-implicate. And I -- if I can 01:59:09
recall correctly where I remember that 01:59:10

from, I can find it. **01:59:11**

BY MR. KUO: 01:59:16

Q. So, Dr. Hough, all I asked you is, is one of the things that Krantz requires in order to access a network user authentication? 01:59:17 01:59:18 01:59:19 01:59:22

Is it? One of the things. I'm not limiting the question. 01:59:24 01:59:29

A. So there is an example of the kind of credentials that give an example of user authentication, and then there are other examples and other protocols mentioned that include authentication of machines and systems themselves independent of the user. **01:59:33 01:59:36 01:59:40 01:59:42 01:59:44 01:59:47 01:59:51**

Q. Is authorizing the credentials of the user one of the things that Krantz talks about in order to give access to a network? 01:59:55 01:59:57 02:00:03 02:00:05

A. I mean, it kind of teaches this in a few different places in terms of part of what you're asking and another part of what you're asking. **02:00:40 02:00:42 02:00:45 02:00:47**

So it does teach in paragraph 16, "Based on credentials, the server may **02:00:48 02:00:49**

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authorize the client for at least partial access to the second network and/or may deny access to the second network and authorize the client for at least partial" -- for at least partial access to the second network -- sorry, "and/or may deny access to the second network and authorize the client for at least partial access -- partial to access to the first network." 02:00:51 02:00:53 02:00:55 02:00:57 02:01:03 02:01:05 02:01:07 02:01:09 02:01:12

I think that's a typo there, but at least partial -- it says, "At least partial to access to the first network," but I think we can eliminate that first "to." 02:01:15 02:01:17 02:01:21 02:01:23 02:01:26

That's what a POSITA would have understood. So it's talking about credentials, and there are places where it talks about server credentials, protocols that discuss server credentials, independent user. 02:01:26 02:01:28 02:01:29 02:01:35 02:01:38 02:01:40

But there is an example of a credential, for example, in paragraph 19, where credentials are guest credentials or an authenticated user is not authorized, implying that -- that some user 02:01:41 02:01:43 02:01:48 02:01:51 02:01:55

authentication can be part of credentials there.

So it's not exactly -- it's not -- at least I haven't seen -- I could look through Krantz some more. There might be a more concise teaching, but at least split among that is the idea that there are credentials, credentials used very generally in what can be used to authorize networks.

It does talk about various protocols that include things like machine credentials, but it also mentions how user credentials can be used to deny access or not authorize things.

And so I think that's one of many things that could be included in the kind of credentials discussed in Krantz.

Q. The embodiment in Krantz that does this analysis of checking credentials is a radius server; is that right?

A. Well, the -- Figure 2 doesn't -- doesn't explicitly call the server a radius server, but there is an example, again, in -- of paragraph 16 that "Based on the

credentials, the server may authorize the client for at least partial access to the" -- and then it goes on. 02:03:10 02:03:12 02:03:15

And then it says, "The server can be a remote authentication dial-in user service or radius," in parens -- quotes, "server that is located on the first network." 02:03:16 02:03:18 02:03:21 02:03:25 02:03:28

So that's an example, but that's not the only thing that meets -- has to be used in Krantz for that. 02:03:29 02:03:31 02:03:36

Q. If we look at paragraph 58 of Krantz. 02:03:41 02:03:44

A. Okay. 02:03:56

Q. And here there's reference to server 215 that you just talked about, right, from Figure 2? 02:03:56 02:03:59 02:04:02

A. It references server 215 in some embodiments, how it logically represents a radius server. 02:04:02 02:04:05 02:04:09

Q. Again, it talks about a -- so you agree that it says that server 215 is a radius server? 02:04:11 02:04:15 02:04:23

MR. BORDER: Objection. Foundation. Form. 02:04:25 02:04:25

THE WITNESS: It says in some embodiments, server 215 logically represents a radius server. I omitted some of the longer -- it's -- you know, blow-up of the radius -- 02:04:26 02:04:28 02:04:30 02:04:33 02:04:37

BY MR. KUO: 02:04:41

Q. Other than a radius server, is any other type of authentication server disclosed in Krantz? 02:04:41 02:04:45 02:04:47

(Pause for reading/reviewing.) 02:05:40

A. Well, if you look at the paragraph 69, it talks about a protocol EAP-radius. **02:06:28 02:06:30 02:06:33**

Q. Uh-huh. 02:06:33

A. But if you look at paragraph 99, it talks about a protocol such as EAP-MSCHAPv2, and then the next paragraph 100, EAP-TLS. So it is disclosing these other types of servers that disclose these alternative protocol. **02:06:33 02:06:36 02:06:38 02:06:44 02:06:47 02:06:50**

Q. I'm sorry. What paragraph is that? 02:06:51 02:06:52

A. That's 99 and 100. **02:06:52**

And these protocols specifically talk about how in 100 EAP-TLS options, such **02:06:54 02:06:56**

as, for example, use of a smart card, use of a certificate at the client, use of simple certificate selection, do not use server selection, server validation, server name.

And so it's talking about all these other things that in addition to simple user authentication, which is, you know, certificates for clients, which -- which are, for example, tied to the server as opposed to any particular user.

Q. What kind of server -- what kind of server use this -- you said protocol of EAP-MSCHAPv2?

A. Well, servers that support -- support that protocol as distinguished from servers that support, for example, the EAP-radius protocol, which is mentioned earlier. I lost my place there.

Q. Right. Do servers that use EAP-MSCHAPv2, is there a particular brand name for those types of servers?

MR. BORDER: Objection. Outside the scope.

THE WITNESS: I mean, we could --

if you have a spec sheet for such a server, I can take a look a we can -- 02:08:05 02:08:07

BY MR. KUO: 02:08:08

Q. I'm just asking, do you know. Do you know whether -- servers that use this protocol, can you name any of them? 02:08:09 02:08:11 02:08:15

MR. BORDER: Objection. Outside the scope. 02:08:17 02:08:18

THE WITNESS: Well -- 02:08:18

BY MR. KUO: 02:08:21

Q. If you don't, that's fine. 02:08:22

A. I don't know who makes, you know, brand names of various radius servers. That's a class of servers that support a protocol. 02:08:26 02:08:27 02:08:29 02:08:31

Similarly, there's a class of servers that support a different protocol, for example, EAP-MSCHAPv2. This spec, I don't remember if it mentions any of these servers by brand name. 02:08:32 02:08:34 02:08:36 02:08:42 02:08:46

Q. And you can't name them? 02:08:47

A. They're there. There's a protocol. The server supports a protocol. That's it. We can look at spec sheets if you want to take a look. 02:08:48 02:08:50 02:08:52 02:08:54

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But it's clearly -- Krantz is clearly disclosing a wide variety of protocols for -- that include examples such as authentication using smart cards or certificates, server certificates. 02:08:55 02:08:57 02:08:59 02:09:02 02:09:06

Q. Do you know -- 02:09:08

A. And these kind of server certificates, I personally installed on web servers that are certificates tied to a particular server computer as opposed to a user. 02:09:08 02:09:10 02:09:13 02:09:15 02:09:17

And so these protocols are clearly disclosing, in addition, being -- doing authentication based on the computer or server as opposed to just the user. 02:09:18 02:09:20 02:09:23 02:09:26

Q. Did you talk about this in your -- in your declaration? 02:09:29 02:09:32

A. I may have mentioned these other protocols. I don't recall from memory. But if I had a -- 02:09:44 02:09:47 02:09:49

(Simultaneous unreportable crosstalk occurs among parties.) 02:09:49 02:09:49

BY MR. KUO: 02:09:51

Q. Do you know how servers that operate under these other protocols work? 02:09:51 02:09:54

A. I would look at the protocol spec, and I would expect they work by following the protocol specifications.

Q. So other than telling me that you can read the specification and assume that it operates according to specification, you, as you sit here today, can't tell me how they work?

MR. BORDER: Objection. Outside the scope.

THE WITNESS: There's hundreds or thousands of different protocols. I don't have them all committed to memory, and I'm not going to apologize for that either.

The radius server works the way the radius spec says --

BY MR. KUO:

Q. Do you know how the radius server works?

A. I would assume they all work and have been designed to follow the specifications.

Q. Do you know how a radius server works?

MR. BORDER: Objection. Outside the scope. 02:10:41 02:10:42

THE WITNESS: I would expect a radius server works the way the specification requires it -- 02:10:42 02:10:43 02:10:45

BY MR. KUO: 02:10:47

Q. I'm not asking about your expectation. 02:10:48 02:10:49

I'm asking, do you know how a radius server works? 02:10:49 02:10:51

MR. BORDER: Objection. Outside the scope. 02:10:52 02:10:53

THE WITNESS: I didn't discuss anything like that in my declaration. 02:10:53 02:10:55

BY MR. KUO: 02:10:57

Q. Do you know how a radius server works? 02:10:57 02:11:00

MR. BORDER: Same objection. 02:11:01

THE WITNESS: I can look up how a radius server works if you want to hand me the document. We can go through a document of the radius protocol. 02:11:02 02:11:04 02:11:06 02:11:07

BY MR. KUO: 02:11:11

Q. As we sit here right now, without you looking at a document and just telling 02:11:11 02:11:15

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me that you expect a radius server would operate the way that it's written on a document, can you tell me how a radius server works? 02:11:16 02:11:18 02:11:19 02:11:21

MR. BORDER: Objection. Form. Outside the scope. 02:11:22 02:11:23

THE WITNESS: Sir, there are thousands of protocol specifications out there. I certainly haven't memorized every single one so I can quote back to you what -- what they say. But that is easily looked up to see what the protocol specifications say for any of these protocols. 02:11:23 02:11:24 02:11:26 02:11:27 02:11:29 02:11:31 02:11:35 02:11:37

What I'm saying here is that within the teachings of what Krantz is saying, it already gives examples of these protocols for where certificates for the client -- certificates for server validation can be submitted -- 02:11:41 02:11:43 02:11:45 02:11:49 02:11:53 02:11:59

BY MR. KUO: 02:12:01

Q. And I haven't asked you -- 02:12:01

A. -- independent of just only user authentication. So these protocols are more broad -- **02:12:02 02:12:05 02:12:06**

Q. I haven't asked you anything about that. 02:12:06 02:12:07

A. These protocols are more broad -- 02:12:08

Q. I haven't asked you -- 02:12:09

A. -- and it's what's being taught in Krantz. 02:12:10 02:12:13

Q. I haven't asked you anything about that. 02:12:13 02:12:14

I've asked you a very simple question, and if the answer to that question is that you can't, that's fine. 02:12:15 02:12:16 02:12:18

A. No, the answer is not that I can't. The answer is that these things aren't all knowable and I don't know why I have to have committed them all to memory and tell you them from memory. 02:12:21 02:12:22 02:12:26 02:12:29 02:12:31

So we can go look up protocol specifications that we expect servers that support particular protocols to behave like the specifications say. Otherwise, I wouldn't expect them to be able to claim that they support those protocols. 02:12:35 02:12:37 02:12:40 02:12:42 02:12:45 02:12:47

Krantz specifically calls out protocols, gives examples of things in these protocols for authentication at the 02:12:48 02:12:50 02:12:55

server level and not merely at the user level. And that's what Krantz is teaching. So it's not an ability of can I or can't I. I don't have everything memorized. And if you give me some time to look at a specification, I can -- and a product spec or whatever, we can talk about how the servers worked.

But I haven't done that as part of what's in my declaration. And this is a cross-examination, as I understand.

Q. Do you know if radius servers receive user connection requests?

A. So I don't know from memory all the different types of messages --

(Simultaneous unreportable crosstalk occurs among parties.)

BY MR. KUO:

Q. I didn't ask about all the different types. I asked you specifically, do you know if radius servers receive user connection requests?

A. Is that discussed in some of these?

Q. That's my question to you.

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A. Well, I don't recall talking about it in my declaration. 02:14:29 02:14:30

Q. Do you know or do you not know? 02:14:31

A. I could find out if you want me to research it, but I don't know -- 02:14:33 02:14:35

Q. Do you -- 02:14:37

A. -- I don't know from memory. 02:14:37

And I appreciate it if you would actually let me complete my answer before you interrupt me. You've done it multiple times in the last few minutes. Please let me finish my answer. 02:14:38 02:14:40 02:14:43 02:14:44 02:14:46

I'll wait for you to finish your question. I'll wait -- 02:14:47 02:14:48

Q. Sir. 02:14:50

A. I'll give you a pause -- 02:14:50

Q. Sir. 02:14:51

A. -- and then I'll answer. 02:14:52

MR. BORDER: Joe, let him finish. 02:14:52

THE WITNESS: I would really like for you to let me finish my answer. 02:14:54 02:14:56

BY MR. KUO: 02:14:57

Q. I would love -- I would love to let you finish your answer to my question if you were actually answering my question. 02:14:57 02:14:59 02:15:00

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A. I'm trying to do the best to answer your question and give some explanation.

Q. You can -- whether you want to offer an explanation, that's -- but I would like an answer to my question and not whatever question you feel like testifying about.

My question is: Do you know whether radius servers receive user connection requests?

MR. BORDER: Objection. Outside the scope.

THE WITNESS: We could look that up in the radius protocol. That's something that was -- should be straightforward. If you want to hand me a copy of the radius protocol, I can try to dig through it.

BY MR. KUO:

Q. Do you know whether radius servers, after receiving a user connection request, authenticate the user?

MR. BORDER: Objection. Outside the scope.

THE WITNESS: So if you want to provide me with a copy of the radius spec, we can take a look at it and answer questions based on the spec. I don't have these things memorized. 02:15:59 02:16:03 02:16:05 02:16:08 02:16:09

BY MR. KUO: 02:16:10

Q. Do you know whether radius servers after receiving a user request and authenticating a user then return the conversation information necessary for the client to deliver service to the user? 02:16:11 02:16:12 02:16:14 02:16:17 02:16:19

MR. BORDER: Objection. Outside the scope. 02:16:21 02:16:23

THE WITNESS: We can take a look at the protocol if you would like to hand me a copy of it. 02:16:23 02:16:24 02:16:26

BY MR. KUO: 02:16:32

Q. We talked earlier about device auditing as compared to user authentication. 02:16:33 02:16:40 02:16:43

Do you recall that? 02:16:44

A. A little bit. **02:16:45**

Q. Are radius servers typically used for device auditing, do you know? 02:16:47 02:16:51

MR. BORDER: Objection. Outside 02:16:55

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the scope. 02:16:58

THE WITNESS: We can take a look 02:16:58

at the protocol spec if you would like 02:16:59

to hand me a copy. 02:17:01

BY MR. KUO: 02:17:01

Q. So you don't know? 02:17:02

A. I haven't got these things 02:17:02

memorized, as I've said many times. And I 02:17:05

know you know that, but you can continue to 02:17:07

ask these questions if you want. 02:17:10

Q. So earlier today, we talked about 02:18:13

access points and routers. 02:18:28

Do you recall that? 02:18:31

A. Yes. Some of it. 02:18:32

Q. And is a router just a type of 02:18:34

data routing device? 02:18:40

A. I mean, I think I told you 02:18:51

earlier about some of the functions that 02:18:53

typical routers are designed to have. 02:18:55

Q. And routers can operate in VLAN 02:18:58

environments, correct? 02:19:01

A. If they support the required 02:19:02

feature sets, they can. But if they don't 02:19:08

support it, then they wouldn't. 02:19:11

Q. What do you mean by "feature 02:19:13

set"? 02:19:14

A. Well, you need to be able to support and be compatible with the kind of VLAN tags, and to the extent the router has that capability, it would be compatible with VLANs. But if it doesn't, then it wouldn't be. 02:19:15 02:19:16 02:19:20 02:19:23 02:19:26 02:19:28

Q. Right. So you're talking about a specific router as opposed to routers in general? 02:19:29 02:19:30 02:19:33

A. Well, I'm saying that you're saying routers as all routers, and it may not be the case that all routers are -- work. 02:19:33 02:19:38 02:19:41 02:19:44

Q. I did not say that. I'm just saying, as a category of product, routers operate and can operate in VLAN environments, correct? 02:19:44 02:19:47 02:19:49 02:19:52

A. Some of them could. 02:19:56

Q. Sure. Okay. You talked before about MAC addresses. What's a MAC address? 02:19:57 02:20:02

A. Well, a MAC address, I think it stands for media access control. It may stand for other things in other contexts. There's a security context that MAC means 02:20:09 02:20:13 02:20:15 02:20:18

something different in. **02:20:20**

But what I'm talking about is more of like a physical layer or a link layer address scheme. So Ethernet has the concept of MAC addresses, and that is a globally unique address, or one that's supposed to be globally unique, that can be used to address devices on an Ethernet level, for example. **02:20:21 02:20:23 02:20:26 02:20:34 02:20:37 02:20:40 02:20:42 02:20:47**

Q. Is it like a VIN on a car? 02:20:49

A. Well, in one sense that maybe VINs are supposed to be globally unique, but not in the sense the VIN tells you where the car goes. **02:20:56 02:20:59 02:21:01 02:21:03**

Q. Okay. So the MAC is globally unique and also tells you where it goes? 02:21:04 02:21:06

A. It's used as an address. I don't really think that VIN numbers are used as addresses. **02:21:08 02:21:10 02:21:12**

Q. But a MAC address is used as -- you said as an address, so it tells you where it goes? 02:21:13 02:21:16 02:21:18

A. It tells you the intended destination of a -- of a -- of an Ethernet frame. **02:21:19 02:21:20 02:21:24**

Q. Okay. Is it routing that's done with -- I assume that -- based on your answer, that MAC addresses are used to direct where data goes? 02:21:25 02:21:28 02:21:30 02:21:33

A. It's slightly -- switches and routers can have a distinction because routers actually operate a different layer in the network stack that typically are associated with having network layer addresses, so different than MAC layer addresses. **02:21:38 02:21:40 02:21:43 02:21:44 02:21:47 02:21:49 02:21:52**

A data frame will have both -- typically, both an Ethernet header and an IP header, but routers -- network routers typically operate at the network layer, so they're operating on network layer addresses not on link layer addresses, such as MAC addresses. **02:21:53 02:21:55 02:22:00 02:22:05 02:22:07 02:22:10 02:22:12**

So there is some distinction there, depending on how -- how accurate the context is -- needs to be. **02:22:13 02:22:15 02:22:23**

Q. Can you explain to me what the difference is between a network layer versus a link layer? 02:22:24 02:22:26 02:22:27

MR. BORDER: Objection. Outside 02:22:29

the scope. 02:22:30

THE WITNESS: Sure. I mean, in 02:22:30

some sense link layer addresses are 02:22:40

intended to be used locally. That is, 02:22:42

I wouldn't put a link layer packet and 02:22:47

send it across the Internet because the 02:22:52

Internet doesn't support link layer 02:22:54

routing. But a local LAN or a switch 02:22:56

would support link layer switching. 02:23:00

BY MR. KUO: 02:23:06

Q. And what is a network layer? 02:23:06

A. A network layer is, like, for 02:23:08

example, IP. The Internet protocol uses 02:23:15

network layer addresses, and those -- there 02:23:19

are some sets of address space that are not 02:23:21

designed to be globally unique, but some 02:23:23

set that are intended to be globally 02:23:25

routable that should, at least in the old 02:23:27

days, be kind of unique in that -- and that 02:23:30

the routers at the network layer -- we 02:23:37

discussed this earlier -- use the concept, 02:23:40

at least in IP routing, of a longest prefix 02:23:42

match to determining the proper forwarding 02:23:45

port. 02:23:49

What that means is that's the 02:23:50

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largest number of consecutive leading bits of the -- of the address that can be used to determine the proper destination in a -- in a routing table. 02:23:51 02:23:53 02:23:57 02:24:02

And so -- so network addresses are used in a broader network. Link layer addresses are more used within a local area network, generally. 02:24:05 02:24:14 02:24:16 02:24:20

Q. So in your answer, you referenced, "at least in the old days." Could you be specific as to what time frame that is? 02:24:21 02:24:22 02:24:26 02:24:29

A. I mean, yeah, at some point in time there's a new -- there's a concept where you could have IP addresses mapped to actually different locations based on location. But that's more of an advanced feature. 02:24:32 02:24:40 02:24:42 02:24:45 02:24:48 02:24:51

I don't know how widely deployed it is or used. But, you know, early 2000s, I would say still is a day where an IP address is really mapped to one destination. 02:24:51 02:24:53 02:24:57 02:25:01 02:25:03

Q. So the old days would be before this 2000 time frame you're talking about? 02:25:06 02:25:08

You just referenced "the old days" in your answer, and I just wanted to understand what time frame you're talking about. 02:25:20 02:25:23 02:25:25

A. No. I understand why you're asking. So let me just... 02:25:27 02:25:28

Q. I think your and my old days are different from my colleague's old days. 02:25:35 02:25:37

A. Even through the mid-2000s, I don't think there was any more advanced -- these advanced concepts, I don't think were out there yet, as opposed to today or in the last few years where there are more advanced techniques. 02:25:42 02:25:44 02:25:46 02:25:48 02:25:51 02:25:52

And IP addresses aren't as -- even globally routable IP addresses, there's some specification I've seen, and I don't remember what the date is on that, that allows some sort of local routing for global IP addresses that could actually go to different machines on the network. 02:25:56 02:25:58 02:26:01 02:26:04 02:26:06 02:26:09 02:26:10

I forget when -- I just don't recall offhand when -- when that concept really was first specified and -- and then used. 02:26:13 02:26:15 02:26:17 02:26:19

But I think if we're talking 02:26:21

about the time frame of the priority date of this patent, that would be the days where that's not the expectation. The expectation is a globally routable address goes to one machine. That's my understanding. 02:26:22 02:26:26 02:26:28 02:26:30 02:26:32 02:26:38

Q. We've talked a bit about the instances in which you are relying on Herrmann in combination with Krantz. 02:26:38 02:26:57 02:26:59

And, actually, if we could turn to page -- I don't know what page. Paragraph 211 of your declaration. 02:27:06 02:27:08 02:27:11

A. Okay. **02:27:26**

Q. Okay. And here you talk about Krantz teaching or suggesting each element of Claims 1, 2 and -- you just list them there. 02:27:27 02:27:36 02:27:38 02:27:41

But then you say, "To the extent one may assert that Krantz does not teach or suggest," quote, "applying a security policy...," close quote, "or," quote, "using the gatekeeper to determine if requirements of the security policy are satisfied by the access device," and the sentence goes on. 02:27:41 02:27:44 02:27:46 02:27:50 02:27:55 02:27:58 02:27:59 02:28:07

But it would have been obvious in view of the teachings of Krantz in combination with Herrmann, right? 02:28:08 02:28:09 02:28:15

A. Yeah. I think that's what I say there. **02:28:16 02:28:17**

Q. And I think elsewhere -- if I can find it. 02:28:18 02:28:26

Yeah, if you could turn to page 52 -- not page 52, paragraph 52. 02:28:27 02:28:39

A. Of my report or of Krantz? **02:28:42**

Q. Of your declaration, yeah. 02:28:44

A. Okay. **02:28:55**

Q. And here you talk about the combination of Krantz and Herrmann that -- again, right? 02:28:55 02:28:57 02:29:02

A. Sure. It's in that -- another section. **02:29:03 02:29:05**

Q. Right. And here you say that -- in paragraph 52, you say, "A POSITA would recognize that checking for antivirus software as part of a security policy would merely be an additional item for server 215 to check in the process already disclosed by Krantz," right? 02:29:05 02:29:06 02:29:09 02:29:12 02:29:14 02:29:17 02:29:20

A. Yes. **02:29:22**

Q. And this -- this checking for antivirus software, that's different from user authentication, right? 02:29:22 02:29:27 02:29:31

A. I'm sorry. What was the question again, please? **02:29:36 02:29:37**

Q. Checking for antivirus software, that's different than checking user authentication, correct? 02:29:39 02:29:41 02:29:45

A. Sure. **02:29:48**

Q. And you say it would -- you use the word "merely," "merely be an additional item for server 215 to check," right? 02:29:49 02:29:51 02:29:54

A. Yeah. **02:29:59**

Q. Are you aware at that time of any -- where people actually did that, they took the -- combined the checking for user authentication with checking for antivirus software? 02:30:00 02:30:11 02:30:13 02:30:18 02:30:21

A. I mean, if you're asking me whether I'm sitting here today I can think of commercial examples that -- I mean, I can't think of one way or the other whether that would or wouldn't have been part of anything. **02:30:22 02:31:43 02:31:45 02:31:46 02:31:48 02:31:51**

Q. Okay. 02:31:51

A. But I still think it's obvious, as I've laid out here. 02:31:51 02:31:53

Q. I understand your opinion. I'm just asking you the questions. 02:31:54 02:31:57

And in the InfoExpress, the '460 patent where it discusses user authentication being one security measure and then device auditing being a different -- or an additional security measure, do you know if that's a -- if those two types of checks were things that people knew about for a while? 02:32:04 02:32:09 02:32:11 02:32:15 02:32:19 02:32:21 02:32:28 02:32:31

MR. BORDER: Objection. Form. 02:32:37

THE WITNESS: Yeah, I think, as evidenced by my prior art that I've cited, that people -- it was known it was prior art. 02:32:39 02:32:40 02:32:43 02:32:45

BY MR. KUO: 02:32:45

Q. Okay. Do you know how long in advance of -- do you know if before the prior art you cited, people recognized that it would be better to have both user authentication as well as device auditing? 02:32:47 02:32:48 02:32:51 02:32:54 02:32:59

A. I mean, I would expect that it would be reasonably well known before that, 02:33:40 02:33:42

but I have the dates -- the references I used are what the dates are. 02:33:44 02:33:46

Q. Why do you believe it would be reasonably well known? 02:33:48 02:33:49

A. Well, these are types of things that companies trying to secure their data would care about. They would care that users have authentication. 02:33:55 02:33:57 02:34:01 02:34:03

I think that goes well back into the '70s or earlier, with the earliest, you know, UNIX systems and computers. Many computer systems did implement user authentication to at least get access to the computer itself. 02:34:05 02:34:06 02:34:11 02:34:14 02:34:16 02:34:19

And that viruses have been around for quite some time before 2002 and corporations in particular, you know, especially companies like banks with secure data, would -- would -- I think even by the '90s, they would want to have an understanding of the security vulnerabilities in their networks. 02:34:20 02:34:23 02:34:27 02:34:31 02:34:33 02:34:41 02:34:42 02:34:47

And I think I used some type of security vulnerability-checking software myself sometime in the '90s. 02:34:49 02:34:50 02:34:54

Q. You said you used some type of security vulnerability-checking software sometime in the '90s. 02:34:56 02:35:08 02:35:12

Are you referring to checking to see if the device that's intended to connect to the network has the appropriate software? 02:35:17 02:35:19 02:35:24 02:35:26

A. Sure. Security patches, things like that. There was software that could detect those kind of things remotely already by some point in the mid '90s, so -- and certainly there was antivirus software, I'm pretty sure, by at least that time as well. **02:35:28 02:35:31 02:35:33 02:35:36 02:35:39 02:35:42 02:35:45**

Q. Okay. And so but that -- this example that you just gave of vulnerability-checking software, that was not -- that was a stand-alone product? 02:35:46 02:35:50 02:35:56 02:35:57

A. Well, the -- one of them -- I think there was several that I looked at, but I remember using one called Nmap, which was a stand-alone network scanner which could tell you things like the operating system type. It could try to determine the patch level of operating systems, detect -- **02:36:05 02:36:08 02:36:10 02:36:13 02:36:15 02:36:17 02:36:19**

look for other network security vulnerabilities. 02:36:27 02:36:29

Q. Was that used in conjunction with network access controls? 02:36:29 02:36:35

A. Well, if you scan, there could still be network access controls in place between the scanner and device, and people actually might want to scan, you know, from behind a firewall and in front of a firewall as well. 02:36:37 02:36:45 02:36:47 02:36:50 02:36:52 02:36:56

So I think, certainly, it was known to be used with various access control devices. 02:36:57 02:36:58 02:37:02

MR. KUO: Can we take, like, five, ten minutes? 02:37:13 02:37:15

MR. BORDER: Sure. 02:37:16

THE WITNESS: Sure. 02:37:17

(Whereupon, a recess was taken at 2:37 p.m.) 02:37:18 02:44:44

MR. KUO: I have no further questions. 02:44:44 02:44:49

We can go off the record. 02:44:57

(Whereupon, discussion held off the record.) 02:45:04 02:50:10

MR. MICHALEK: Back on the 02:50:10

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record. 02:50:11

EXAMINATION 02:50:12

BY MR. MICHALEK: 02:50:12

Q. Good afternoon, Dr. Houh. How are you? 02:50:13 02:50:14

A. I'm well. How are you? **02:50:14**

Q. I'm good. Thank you. 02:50:16

You understand that you are still under oath from this morning? 02:50:20 02:50:21

A. Yes. **02:50:24**

Q. Any reason you can think of why you wouldn't be able to competently testify at this time today? 02:50:24 02:50:27 02:50:31

A. No. **02:50:32**

Q. And you testified earlier this morning about the -- your opinions regarding the '460 patent; is that right? 02:50:33 02:50:35 02:50:39

A. Yes. **02:50:44**

Q. And you understand this portion of your testimony at this hour is with respect to IPR2024-00677, which is the IPR petition and case relating to U.S. Patent Number 8,578,444; is that right? 02:50:44 02:50:45 02:50:47 02:50:55 02:50:57

A. I don't know these numbers by heart, but the '444 patent is what I **02:51:04 02:51:05**

understand them. **02:51:09**

Q. Let's call it the '444 patent. 02:51:09

Okay. I'm going to mark as 02:51:13

Exhibit 1203, I'll hand to you what I'm 02:51:20

representing to you is your declaration 02:51:22

filed in the '444 petition case. 02:51:24

(Whereupon, Previously Marked 02:51:27

Exhibit 1203 is identified for 02:51:27

the record.) 02:51:28

BY MR. MICHALEK: 02:51:28

Q. Please take a look at it and make 02:51:29

sure it looks in order and looks accurate. 02:51:30

A. Yes. This looks like my -- this **02:51:42**

is my declaration. **02:51:44**

Q. Thank you. 02:51:45

I'm handing to you what is marked 02:51:45

as Exhibit 1201, which is the '444 patent. 02:51:47

(Whereupon, Previously Marked 02:51:55

Exhibit 1201 is identified for 02:51:55

the record.) 02:51:55

BY MR. MICHALEK: 02:51:55

Q. Please thumb through it and 02:51:56

confirm it looks accurate to you. 02:51:58

A. Yes, this looks right. **02:52:06**

Q. Okay. And then I think in front 02:52:08

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of you, you have what we've been calling the Krantz patent, which for this examination I'm going to call Exhibit 1205. 02:52:10 02:52:14 02:52:18

A. Yes. I have it. **02:52:25**

(Whereupon, Previously Marked Exhibit 1205 is identified for the record.) **02:52:27 02:52:27 02:52:27**

BY MR. MICHALEK: 02:52:27

Q. And then also before you is the Herrmann reference, which for this examination I'm going to call 1206. 02:52:27 02:52:29 02:52:31

A. Sure. My exhibit numbers are different, but I understand that they're the same except for the numbers that you referred to. **02:52:34 02:52:36 02:52:37 02:52:40**

(Whereupon, Previously Marked Exhibit 1206 is identified for the record.) **02:52:27 02:52:27 02:52:27**

BY MR. MICHALEK: 02:52:40

Q. Right. And with respect to the '444 patent, is it your understanding that the specification is identical to the '460 patent? 02:52:40 02:52:43 02:52:45 02:52:47

A. That sounds right. **02:52:48**

Q. Let's turn to Claim 1 of the '444 02:52:50

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patent. 02:52:55

A. Okay. **02:53:03**

Q. It says -- one of the first clauses is, "Performing an authentication using an EAP protocol." 02:53:03 02:53:08 02:53:10

Do you see that? 02:53:13

A. Yes. **02:53:14**

Q. What is EAP? If you could point me to what you're referencing to, I can follow along with you. 02:53:15 02:53:41 02:53:44

A. It says in Column 8, line -- **02:54:08**

Q. Which exhibit, sir? 02:54:11

A. Sorry. The '444 patent. Line 38, that EAP stands for extensible authentication protocol. **02:54:12 02:54:17 02:54:20**

Q. Is that a standard? 02:54:28

A. I believe it may be. I don't know what number or -- you know. But, yeah, I've seen it referred to a number of times. **02:54:29 02:54:35 02:54:39 02:54:40**

Q. Okay. What's your basis for that, for that belief? 02:54:41 02:54:42

A. I mean, I've seen the -- I've seen it referred to numerous times, and I may have seen something in the past that -- **02:54:43 02:54:47 02:54:50**

that was one of the original specs, but I can't recall. 02:54:52 02:54:55

Q. Okay. Are you familiar with the standard itself? Have you reviewed a standard or have you just known about it? 02:54:55 02:54:58 02:54:59

A. I think I have reviewed portions of the standard, but I couldn't -- I don't remember everything I read. But I do a lot of cases like this that has involved -- 02:55:01 02:55:04 02:55:06 02:55:09

Q. Sure. 02:55:12

A. I'm sure I've done a case that has involved EAP before, or E-A-P. 02:55:12 02:55:14

Q. For the purposes of your work in this matter -- when I say "this matter," I'm referring to not just the '444 patent or any other work for this engagement -- have you reviewed any EAP standard? 02:55:18 02:55:20 02:55:23 02:55:26 02:55:29

A. I don't remember doing that with respect to this case, but I don't remember everything I read. 02:55:34 02:55:41 02:55:42

Q. Understood. 02:55:43

And this isn't a memory test, so, you know, I'm asking. If you don't know, that's fine. Or you need clarity, please let me know so I can ask a better question. 02:55:44 02:55:46 02:55:48 02:55:50

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Are there different versions of EAP? 02:55:53 02:55:57

A. I think it's possible, but I don't know offhand. **02:55:58 02:56:03**

Q. Okay. Do you know how EAP works? 02:56:04

A. I mean, I may have read about it at some point in time, but I -- I typically don't commit these protocol specs to memory. **02:56:09 02:56:11 02:56:15 02:56:18**

Q. Yeah. There's a lot there. 02:56:18

A. And they're readily available. You just look it up. **02:56:19 02:56:21**

Q. Okay. Do you know if there's -- do you know if the EAP protocol -- or the EAP protocols that you think you remember, do you know if there are different versions of them? 02:56:23 02:56:25 02:56:28 02:56:30 02:56:32

A. Well, I think there are variants. This -- this spec refers to either variants or different versions. I don't know what you would call them. But EAP-radius or EAP-MSCHAPv2, EAP-TLS -- **02:56:32 02:56:35 02:56:40 02:56:41 02:56:44**

Q. Okay. Let's take them one by one. 02:56:49 02:56:50

What is EAP -- I'm sorry. Was it 02:56:50

EAP-MSCHAP you said? 02:56:54

A. Yeah, I think that's right. I think that this spec talks about it somewhere. 02:56:56 02:56:58 02:57:00

Q. When you say "this spec," which exhibit are you referring to? 02:57:00 02:57:04

A. The '444 specification. 02:57:05

Q. Uh-huh. Oh, do you know where in the spec it refers to MSCHAP? 02:57:07 02:57:23

A. Oh, I might be thinking of a different spec, actually. 02:57:35 02:57:37

Q. Yeah. 02:57:38

A. I'll look here. 02:57:38

I don't remember what it -- it refers to EAP -- 02:57:39 02:57:41

Q. I don't think it's in there, but if you find it, let me know. 02:57:42 02:57:44

A. Okay. I was misremembering, because I don't -- it's hard to map what I've seen before as a specific. But I'll be -- I'll look more before I answer to make sure I'm answering correctly. 02:57:45 02:57:48 02:57:51 02:57:54 02:57:58

But no. I think that might be Krantz or something like that. 02:58:00 02:58:07

Q. And you mentioned EAP-TLS. What 02:58:08

is that? 02:58:11

A. That may be another variant or -- of a protocol or a subportion. I don't -- I'm not sure what I'd call it sitting here. 02:58:11 02:58:15 02:58:19

Q. Okay. If I wanted to learn more about what you said it's called, EAP-TLS, is there a standard or a protocol or a place where I could learn about it and read about it? 02:58:22 02:58:24 02:58:27 02:58:29 02:58:32

A. I don't remember which organization, but it might be the IETF. 02:58:35 02:58:35

Q. IETF? 02:58:39

A. Yes. 02:58:41

Q. And what does that stand for? 02:58:41

A. That stands for Internet Engineering Task Force. And I'm not sure if it's that group that would publish it or another group, but that's the place I'd look first if I was looking for the spec. 02:58:43 02:58:45 02:58:47 02:58:49 02:58:54

Q. Okay. Again, we're still on Claim 1. When we're talking about EAP, are we talking about authentication? 02:58:56 02:59:00 02:59:02

A. Well, we're talking about a protocol, which probably includes authentication as -- as -- but protocols 02:59:07 02:59:09 02:59:11

are very specific ways of doing things. 02:59:16

Q. Okay. With respect to -- and we're still on Claim 1 of the '444 patent. There's this concept of auditing. 02:59:20 02:59:24 02:59:26

With respect to auditing, would EAP describe that as well? 02:59:28 02:59:31

A. I mean, I don't know if I would know that offhand. I would look to the spec. 02:59:32 02:59:44 02:59:45

Q. Which spec? 02:59:46

A. EAP, the spec for EAP, to see what it includes. 02:59:47 02:59:53

Q. You see the claim requires -- Claim 1 of the '444 requires auditing. What is auditing? 02:59:54 03:00:19 03:00:24

Let me be more specific. I have the claim open. 03:00:37 03:00:39

A method for auditing a device in Claim 1. What is a method for auditing device? What does that mean? 03:00:40 03:00:42 03:00:44

(Pause for reading/reviewing.) 03:01:42

A. If you look at the specification around Column 12 -- 03:04:53 03:04:55

Q. I'm sorry. Which exhibit are you referring to? 03:04:55 03:04:57

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A. '444 patent, 1201. **03:04:57**

Q. Okay. 03:05:00

A. Around Column 12, line 5, it says here, "The security audit typically includes determining if access device 230 satisfies requirements of the security policy. Security audit optionally includes active probing, scanning, and/or collection of third-party data regarding access device 230. In some embodiments, authenticate user Step 440 is considered part of the security policy audit." **03:05:00 03:05:05 03:05:07 03:05:09 03:05:11 03:05:14 03:05:16 03:05:19 03:05:25 03:05:27**

So that's an example from the spec as to what's involved in an audit. **03:05:31 03:05:34**

Q. Anything else? 03:05:39

A. I can continue looking, but that's certainly one example from the spec of what's involved in an audit. **03:05:41 03:05:44 03:05:46**

Q. Anything else? 03:05:49

(Pause for reading/reviewing.) 03:07:10

A. I don't know if I see anything else, although I thought I remembered something about what the '444 spec said, that -- something about configuration data or collecting it is also audit data. **03:10:58 03:11:00 03:11:03 03:11:06 03:11:07**

So -- but I can't remember where that came from in the spec, and I don't see it as I'm scanning through it right now. But I -- assuming those are -- at least the first one where I did have a citation was right out of the spec. 03:11:13 03:11:14 03:11:16 03:11:19 03:11:22 03:11:25

Q. And your citation is? Are you referring to your report? 03:11:26 03:11:30

A. No. When I cited it earlier. 03:11:30

Q. Oh, earlier. 03:11:32

A. Earlier, like a few minutes ago. 03:11:32

Q. Okay. Let's go to your report here, starting on page 33 and going on to 34. 03:11:35 03:11:39 03:11:41

Your opinion is -- I'll wait for you to get there. 03:11:43 03:11:46

A. Okay. I'm there. 03:11:48

Q. Your opinion in paragraph 68 is, "Krantz explains that the credentials are audited at the server as: Authentication module 217 can receive the credentials (e.g., user-identifier and password) and compare the credentials to entries in user database 218." 03:11:49 03:11:52 03:11:54 03:11:59 03:12:04 03:12:07 03:12:10

Do you see that? 03:12:11

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A. Yes. **03:12:13**

Q. Is that an accurate opinion as to auditing? 03:12:14 03:12:16

MR. BORDER: Objection. Form. 03:12:25

(Pause for reading/reviewing.) 03:13:13

THE WITNESS: Well, again, I stand by my opinions in my declaration, and especially in light of if you look at the Exhibit 1201 at Column 12, line -- line -- 03:13:13 03:13:15 03:13:18 03:13:19 03:13:24

BY MR. MICHALEK: 03:13:25

Q. I'm sorry. Can you slow it down, please. 03:13:25 03:13:26

A. Yeah. If you look at Exhibit 1201, Column 12, right near the top. **03:13:27 03:13:28 03:13:33**

Q. Okay. 03:13:33

A. And it says, "A particular member of security policy 330A or security policy 330B used to perform the audit may be responsive to the identity of the access device" -- oh, all right. So let me -- there isn't the part I'm thinking about. This might not be it. **03:13:33 03:13:38 03:13:43 03:13:47 03:13:49 03:13:53 03:13:56**

Yeah, here we go, the last line **03:13:57**

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of that. Line 9, "In some embodiments, authenticate user step is considered part of the security policy audit." 03:14:01 03:14:06 03:14:07

So, you know, what we're getting here in Krantz, what I'm citing to is this comparing credentials and basically authenticating the user. 03:14:10 03:14:12 03:14:16 03:14:18

And that's specifically included as an example in the '444 specification, Exhibit 1201, as something that's considered part of the security policy audit. 03:14:20 03:14:22 03:14:26 03:14:29 03:14:31

Q. Paragraph 68 says, "Krantz explains that the credentials are audited at the server." And you refer to those credentials as user identifier and password; is that correct? 03:14:33 03:14:40 03:14:42 03:14:45 03:14:52

A. Sure. Well, I cite to Krantz, which says that's what the user credentials are. 03:14:53 03:14:55 03:14:58

Q. Let's go to paragraph 137 of your declaration. 03:14:59 03:15:07

A. Okay. 03:15:17

Q. Paragraph 37 -- and this is your opinion with respect to Krantz. You say, 03:15:19 03:15:22

"Krantz discloses that when credentials are sent to server 215 and authentication module 217 can receive their credentials (e.g., user identifier and password) and compare the credentials," bracketed, "applying a security policy, to entries in a data -- user database 218." 03:15:24 03:15:26 03:15:28 03:15:32 03:15:33 03:15:36 03:15:38

And it goes on, and I'll truncate it a little bit. But at the end it says, in brackets, "That includes at least on" -- I think it's "one requirement pertaining to authentication." 03:15:41 03:15:45 03:15:47 03:15:51 03:15:54

Do you see that? 03:15:54

A. Yes. **03:15:57**

Q. Is it your testimony that a user identifier and password can be used to meet the limitation that includes at least one requirement pertaining to authentication? 03:15:58 03:16:01 03:16:04 03:16:06

A. Well, it's really this whole statement, that "If the credentialed information matches an entry in the user database, 218, the identity of a user is authenticated. Server 215 believes that the user represented by the user identifier is the user who entered the credential **03:16:22 03:16:24 03:16:26 03:16:29 03:16:32 03:16:35 03:16:38**

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information." And that's what I'm saying is disclosing -- what I have in brackets is because that's where I'm showing how Krantz is disclosing that element of the claim, because the bracketed italicized language is the claim language. And so that's how that meets -- that includes at least -- I think it's one. There's a typo there. That includes at least one requirement pertaining to authentication, and that's -- that's what the claim language is. So that's what I'm saying is the mapping of what Krantz is disclosing.

Q. Okay. And back to paragraph 68 that we just talked about used that same section to -- as your testimony that Krantz meets the auditing limitation; is that right?

A. Yeah. I mean, based on what paragraph -- well, 1201, that section of the patent that I pointed you to earlier, I think in Column 12. That authenticating user Step 440 is considered part of the

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security policy audit that I stand by my mappings here.

Q. How does Krantz talk about 1201? Does Krantz disclose or discuss 1201 at all?

A. No, I don't think Krantz --

MR. BORDER: Object to form.

THE WITNESS: I don't think Krantz mentions the '444 patent.

BY MR. MICHALEK:

Q. Is it accurate to suggest that your testimony is that a user identifier and password meets both the authentication step and the auditing step of the claim?

A. Which steps, sorry, were you saying? Authenticating and --

Q. Yeah. Let's isolate this a little bit.

A. Okay.

Q. Let's go back to Claim 1.

A. Okay.

Q. Claim 1 has many limitations. One of them is a method for auditing a device. Another one is at least one requirement pertaining to the

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authentication. 03:19:07
Do you see that? 03:19:07
A. Yes. **03:19:11**
Q. Those are the limitations that I 03:19:11
was referring to in my previous question. 03:19:12
A. Okay. What was the question **03:19:18**
again? **03:19:20**
Q. Is it accurate to suggest that 03:19:24
your testimony is that -- is that a user 03:19:25
identifier and password meets both the 03:19:28
authentication portion and the auditing 03:19:32
portion of Claim 1? 03:19:34
A. Well, in Claim 1, I'm talking **03:19:36**
about something which is a little different **03:20:10**
than what you're asking. But what I say is **03:20:13**
that Krantz discloses that a client **03:20:16**
sends -- **03:20:18**
Q. I'm sorry. Can you tell me where 03:20:18
you're reading from so I can follow with 03:20:19
you? 03:20:21
A. I'm sorry. Exhibit 1203, **03:20:21**
page 36, starting second line of **03:20:24**
paragraph 73. "Krantz discloses that a **03:20:27**
client sends credentials to the server to **03:20:31**
attempt to authenticate with the server," **03:20:34**

and that "Sending credentials can include sending an" E -- or "Extensible Authentication Protocol (EAP) response/identity message from the client to the service." 03:20:36 03:20:39 03:20:41 03:20:43 03:20:44

And that is mapping to what I'm saying is performing an authentication using an EAP protocol from the device. So that's that mapping. 03:20:44 03:20:50 03:20:52 03:20:56

But the separate mapping of "Includes at least one requirement pertaining to authentication" is where Krantz is talking about the identity of credential information matching an identity of user being authenticated. 03:20:59 03:21:04 03:21:06 03:21:10 03:21:14 03:21:16

And those are -- you know, one is disclosing the EAP protocol part of it, and the other is discussing the user authentication, which is the at least one requirement pertaining to authentication. 03:21:19 03:21:23 03:21:25 03:21:27 03:21:32

So I wouldn't say that I'm saying what you're asking about maps -- that exact thing maps two different steps. They're slightly different. 03:21:37 03:21:39 03:21:42 03:21:44

Q. Well, I'm asking about the -- I'm 03:21:45

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asking about the preamble 1.5, a method for auditing a device, in paragraph 68. 03:21:47 03:21:52

Are you recanting your testimony that, and I'll quote it, "Krantz explains that the credentials are audited at the server as: Authentication module 217 can receive the credentials (e.g., user-identifier and password) and compare the credentials to entries in user database 218"? 03:21:54 03:21:56 03:22:00 03:22:02 03:22:04 03:22:06 03:22:08 03:22:11

MR. BORDER: Objection. Form. Foundation. 03:22:13 03:22:14

THE WITNESS: No. I'm not recanting anything. I stand by my opinions here. My maps are the mappings. 03:22:15 03:22:16 03:22:18 03:22:20

I've written about them in several different sections. But I -- the EAP protocol, which you are asking about authentication in an earlier step in Claim 1, that's element, I think 1.1. And I map that to Krantz disclosing using EAP protocol for -- well, it says what it says. I think for authentication. 03:22:21 03:22:22 03:22:24 03:22:26 03:22:30 03:22:33 03:22:36 03:22:43 03:22:44

And then separately, you were asking about 1.5 as to what the username and password are mapped to, and it wasn't just that. 03:22:47 03:22:48 03:22:51 03:22:54

It's if the credential information matches an entry, then the identity of the user is authenticated, because in Krantz -- actually, it says more than what the '444 patent specification says about authenticating a user. 03:22:56 03:22:57 03:22:59 03:23:04 03:23:08 03:23:10 03:23:12

Because I think in the '444 it doesn't really say that this extra step of -- doesn't match, is the username and password correct. But Krantz does say that. And that -- that is mapping to -- that includes at least one requirement pertaining to authentication. 03:23:13 03:23:14 03:23:18 03:23:21 03:23:24 03:23:26 03:23:27 03:23:29

BY MR. MICHALEK: 03:23:31

Q. And for 1.5, one of those requirements that Krantz teaches is a user identifier and password; is that your testimony? 03:23:31 03:23:34 03:23:36 03:23:40

A. It's that if the -- the identity **03:23:40**

of the user is authenticated by -- if the credentialed information matches an entry in the user database. **03:23:43 03:23:51 03:23:53**

So that's different than simply just a username and password. Krantz is teaching that that credential information matches an entry in the user database, again, more than what the '444 patent says in the spec. **03:23:54 03:23:56 03:23:58 03:24:01 03:24:03 03:24:05**

But that -- and that phrase there is -- you know, preceding the bracketed italicized, that includes at least one requirement pertaining to authentication, is what I'm mapping that to. **03:24:07 03:24:08 03:24:13 03:24:15 03:24:18**

Q. What paragraph in Krantz is that? 03:24:21

A. It's paragraph 76. **03:24:23**

Q. Okay. So you're mapping paragraph 76 to claim limitation 1.5; is that fair? 03:24:43 03:24:45 03:24:49

A. I'm mapping portions of what it says -- **03:24:49 03:24:51**

Q. Portions? 03:24:51

A. -- in paragraph 76 to portions of the claim element. **03:24:52 03:24:54**

Q. And those portions from Krantz 03:24:55

include the portion that says, "E.g., user identifier and password, and compare the credentials to entries in the user database 218." 03:24:57 03:25:00 03:25:02 03:25:05

Is that accurate? 03:25:07

A. Well, I mean, different portions. It's what I lay out in -- well, paragraph 137. It's discussed elsewhere too, like up in -- earlier in the -- in the section -- **03:25:08 03:25:29 03:25:32 03:25:33 03:25:37**

Q. I'm sorry. What are you referring to? 03:25:37 03:25:39

A. Well, I was referring first to paragraph 137, but I have similar discussion earlier in 131, I think, which also cites a similar portion of paragraph 76 in Krantz. **03:25:39 03:25:41 03:25:46 03:25:52 03:25:56**

But this whole section is my analysis for the 1.5 claim element. **03:26:00 03:26:02**

Q. When you say the "whole section," you mean paragraph 76 of Krantz? 03:26:04 03:26:06

A. No. I'm referring to -- my analysis in my declaration, Exhibit 1203, from paragraphs 129 through 138 really is my analysis for element 1.5, and there are **03:26:09 03:26:11 03:26:14 03:26:19**

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portions where I'm talking about some element -- you know, subpart of element -- claim element 1.5 and other portions I'm talking about other ones. **03:26:22 03:26:24 03:26:27 03:26:30**

But I do use that -- that one section from 76 a few times in this section, but I've highlighted different portions at different times. **03:26:31 03:26:33 03:26:38 03:26:40**

Q. Don't you use the identical section for Claim 1.0, a method of auditing a device, in paragraph 68 when you cite to Exhibit 205, paragraph 76, right? 03:26:41 03:26:43 03:26:47 03:26:49

MR. BORDER: Object to form. 03:26:54

THE WITNESS: Yeah, I mean, I do cite to paragraph 67, and that's because the method comprises these steps which includes 1.5. 03:27:09 03:27:11 03:27:12 03:27:15

So I'm merely summarizing at the top what the method for auditing device -- why the preamble is still met. And it's met because the method comprises other elements, such as 1.1 through 1.5. 03:27:16 03:27:19 03:27:21 03:27:23 03:27:24 03:27:27

And I'm -- I don't know if anyone should be surprised that I use some 03:27:29 03:27:31

citations in the preamble that I use in analyzing the elements. 03:27:35 03:27:39

BY MR. MICHALEK: 03:27:41

Q. You say surprise. Why do you say surprise? 03:27:41 03:27:43

A. Well, you seem like it's improper or something that's a surprise that I use the same paragraph from Krantz in the analysis for 1.0 as 1.5. **03:27:43 03:27:45 03:27:48 03:27:53**

Q. Well, I'm a little bit surprised, and let me tell you why. What I'm seeing, and my questions are, that there's a claim limitation which says a method for auditing a device. 03:27:55 03:27:57 03:28:00 03:28:02 03:28:04

And I think you would agree with me that at least a portion of your mapping of Krantz is paragraph 76 -- right? -- which talks about, amongst other things, user identifier and password. Is that fair or not fair? 03:28:04 03:28:05 03:28:08 03:28:11 03:28:13 03:28:17

A. Well, as I discussed earlier and pointed you to a citation from the specification of the '444 patent itself, it talks about a security audit as including -- **03:28:18 03:28:20 03:28:22 03:28:26 03:28:30**

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Q. Did you map the '444 patent as prior art to itself? 03:28:30 03:28:34

MR. BORDER: Objection. Form. 03:28:35

THE WITNESS: In answer to -- I haven't finished the answer to the previous question yet. 03:28:36 03:28:38 03:28:40

But because the '444 patent specifically talks about "Authenticate user step is considered part of a security policy audit." 03:28:41 03:28:43 03:28:46 03:28:47

And no, I don't map the '444. I'm using the '444 to inform the person of ordinary skill reads, you know, what's part of a security audit. 03:28:49 03:28:52 03:28:56 03:28:58

Well, the specification gives some examples. An example given in the specification is that a security audit includes, in some embodiments, authenticate user step. That's considered part of the security policy audit. 03:29:00 03:29:01 03:29:04 03:29:06 03:29:11 03:29:13 03:29:15

So I'm merely pointing out that part of the support for auditing the device is citing from Krantz to where it talks about authenticating a user, 03:29:16 03:29:18 03:29:20 03:29:22

which is expressly given as an example of part of the security policy audit in the '444 patent specification itself. 03:29:25 03:29:28 03:29:35

BY MR. MICHALEK: 03:29:38

Q. Okay. Let's move on from the preamble. 03:29:39 03:29:40

Still sticking on Claim 1, do you see the claim limitation audit data? 03:29:42 03:29:46

A. Well, I see the claim uses the phrase "audit data." 03:30:10 03:30:14

Q. Where are you seeing that? 03:30:15

A. Sending a request -- I think this is what I call element 1.2 in Column 16 of the '444 patent spec, line 14, "Sending a request for audit data." 03:30:17 03:30:19 03:30:22 03:30:26

Is that what you -- one of the things you're referring to? 03:30:30 03:30:30

Q. Yeah. What's audit data? 03:30:31

A. No. Sorry. That element with audit data I call 1.3, not 1.2, I think. Let me just double-check. 03:30:33 03:31:05 03:31:08

Yeah, it's 1.3 that includes the phrase "audit data" as I have it labeled. 03:31:10 03:31:12

So I think I earlier said it was 1.2. It's 1.3. 03:31:15 03:31:17

So the one example I talk about in my mapping in my analysis, if you look at my declaration exhibit, 1203, at paragraph 91 on page 48, it talks about how Herrmann discloses that there's a policy agent or integrity agent 413 to retrieve information about the current security policy in operation on the client device. 03:32:38 03:32:39 03:32:42 03:32:46 03:32:52 03:32:54 03:32:57 03:32:58

And that -- that part, I'm mapping to request for audit data. 03:33:03 03:33:07

BY MR. MICHALEK: 03:33:09

Q. And what's the audit data? 03:33:10

A. It's -- it's one example from Herrmann that a person of ordinary skill would understand falls within the scope of audit data is this information about the current security policy in operation on the client device. 03:33:13 03:33:16 03:33:18 03:33:19 03:33:22 03:33:25

Q. Okay. Anything else constitutes audit data? 03:33:27 03:33:30

Let me ask another question. 03:33:34

In Herrmann, anything else that constitutes audit data, in your opinion? 03:33:35 03:33:37

A. So, well, I mean, I talk about Krantz, if you look at paragraph 89, a few 03:33:43 03:34:08

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pages -- **03:34:10**

Q. Can we stay on Herrmann, and then let's get to Krantz? 03:34:11 03:34:13

So on Herrmann, the question is on Herrmann. Then we can talk about Krantz. 03:34:16 03:34:18 03:34:20

(Pause for reading/reviewing.) 03:35:19

A. I don't see any other discussion with respect to Herrmann about that in paragraphs 91 through 94. **03:35:25 03:35:26 03:35:30**

Q. Let's talk about Krantz, because I think you were going there. 03:35:33 03:35:36

Paragraph 100 of your report, you say, "Other audit data provided by Krantz's device may include, for example, user-identifiers and password[s]," and you cite to paragraph 76 of Krantz. 03:35:41 03:35:43 03:35:46 03:35:48 03:35:50

Do you see that? 03:35:53

A. I'm sorry. What paragraph are you looking at again? **03:35:53 03:35:55**

Q. Sure. 100. And once you review that, my question will be: Is it your testimony that audit data provided by Krantz's device may include, for example, user identifiers and password? 03:35:56 03:36:07 03:36:10 03:36:12 03:36:14

MR. BORDER: Objection. Form. 03:36:18
THE WITNESS: I'm sorry. There 03:36:21
are two questions? 03:36:22
BY MR. MICHALEK: 03:36:22
Q. Just one question. Let me read 03:36:23
it back to you. 03:36:25
Is your testimony that audit data 03:36:25
provided by Krantz's device may include, 03:36:28
for example, user identifiers and password? 03:36:31
A. I mean, if you're reading from 03:36:39
paragraph 100, that's what I say in 03:36:46
paragraph 100. 03:36:48
Q. Thank you. 03:36:51
Is it your testimony in 03:36:57
paragraph 137 of your report that with 03:37:01
respect to the claim limitation, that 03:37:17
includes at least one requirement 03:37:19
pertaining to authentication that Krantz 03:37:21
discloses, that, quote, "When credentials 03:37:26
are sent to server 215, authentication 03:37:28
model 217 can receive the credentials 03:37:31
(e.g., user-identifier and password) and 03:37:34
compare the credentials," and it goes on? 03:37:36
Is that your testimony with 03:37:39
respect to that includes at least one 03:37:41

requirement pertaining to authentication? 03:37:42

A. The requirement is, if the credential information matches an entry in the user database. I think that's part of the requirement. Then the identity of the user is authenticated. 03:37:46 03:37:47 03:37:49 03:37:51 03:37:53

So it's slightly different than just sending the user identifier and password, which you were reading from earlier. 03:37:56 03:37:58 03:37:59 03:38:01

But that requires at least one requirement pertaining to authentication is that the password and user identifier sent actually match an entry in the user database. And that's when the identity of the user is actually authenticated; not simply by sending any user identifier or password. 03:38:01 03:38:03 03:38:04 03:38:08 03:38:10 03:38:12 03:38:14 03:38:17

Q. I want to go back to something else you mentioned earlier. I think I got your testimony right. 03:38:23 03:38:25 03:38:26

You mentioned in the context of the protocols, there's over thousand -- thousands of different protocols. 03:38:27 03:38:28 03:38:30

Do you remember that testimony 03:38:31

earlier today? 03:38:32

A. Sure. Yes. **03:38:33**

Q. Can you explain, when you're talking about thousands of different protocols, what did you mean by that? 03:38:33 03:38:35 03:38:37

A. Well, I was intending to mean kind of in the networking domain. **03:38:38 03:38:45**

Q. Okay. Sure. 03:38:47

A. Okay. Because there are protocols for meeting the Queen of England, for example. That's not what I'm talking about. **03:38:47 03:38:48 03:38:51 03:38:52**

Q. Do you know that one? 03:38:53

A. I've heard about part of the protocol. You're not supposed to walk in front of her, for example. But -- **03:38:54 03:38:55 03:38:57**

Q. We'll do that off record. 03:38:58

A. All right. **03:39:00**

Q. But with respect to networking, it sounds like there's many different protocols; is that fair? 03:39:06 03:39:07 03:39:09

A. There's a lot, and I kind of just ballparked thousands because there quite likely are thousands. **03:39:10 03:39:14 03:39:16**

Q. And we were dancing -- we were 03:39:19

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talking about this concept of a radius server, and I think one of the things that we talked about was 215, server 215 in Krantz, one example, just one example, could be that it's a radius server. 03:39:21 03:39:23 03:39:25 03:39:28 03:39:30

Do you remember that discussion? 03:39:32

A. Vaguely. I don't remember if it was exactly what you just said, but... **03:39:34 03:39:40**

Q. Yeah. I don't want to put words in your mouth, so let's -- maybe we just -- you know, if you want to take a moment to look at Krantz. 03:39:42 03:39:44 03:39:46 03:39:48

A. Yeah, I think there was mention of one example as the server 215 could be. If you want me to look through the citation, but that sounds about right. **03:39:49 03:39:52 03:39:56 03:39:58**

Q. No, because my next question is -- I'm just curious. We talked about in context of Claim 1 of the '444 patent there's this claim limitation to EAP. We talked about that earlier. 03:39:59 03:40:01 03:40:04 03:40:06 03:40:12

Does EAP -- in practice, does EAP work with the radius server? 03:40:14 03:40:16

A. I mean, I'd have to look at which radius server. But I -- offhand, I would **03:40:24 03:40:31**

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need to know, like, which radius server. It's possible that some servers may implement some protocols, and certainly I think Krantz mentioned the EAP-radius protocol or version or some variant. I don't know what to call it exactly.

But that is mentioned, I believe, in Krantz.

Q. That's where I'm kind of confused. You say it's possible that some servers may implement some protocols, and then you say -- are there -- you'd have to know about the radius.

Are there different types of radius servers out there?

A. I think there are probably different -- different ways to configure and different implementations.

Q. Okay. So there's a radius server, but you can configure them with different protocols or different implementations depending on what your desire is?

A. I think you can find different implementations. I think they're --

typically, you can configure these servers in specific ways, but we'd have to look at a specific implementation to see that. 03:41:36 03:41:39 03:41:42

Q. Well, are there -- is there an industry specification that sets forth parameters or instructions for radius servers? 03:41:44 03:41:47 03:41:49 03:41:53

MR. BORDER: Objection. Outside the scope. 03:41:53 03:41:55

THE WITNESS: Well, I mean, generally speaking, like, I think that lots of people can come up with their own server and sell it. I think that is the case in this market, that you can buy a commercial radius server, but then you would need to look at the specific implementation to see what implementation they have and what additional features they may have or what's configureable. 03:41:55 03:41:56 03:41:58 03:42:00 03:42:03 03:42:05 03:42:07 03:42:08 03:42:12 03:42:13 03:42:15

I mean, generally, I think that's the case when you look at -- you get any server off the shelf. It doesn't just run exactly one way because people who make and sell them want to have 03:42:17 03:42:18 03:42:20 03:42:22 03:42:25

their servers be appropriate for use in a lot of different situations. 03:42:29 03:42:31

So I'm just speaking generally now. But I -- I understand there are different radius server implementations actually available. 03:42:32 03:42:34 03:42:41 03:42:43

BY MR. MICHALEK: 03:42:45

Q. Okay. So if I -- if I wanted to -- I think -- strike that. 03:42:45 03:42:48

With respect to Krantz, I think you mentioned something about EAP-radius. Right? 03:42:50 03:42:56 03:42:59

Would EAP-radius of Krantz work with a radius server? 03:43:00 03:43:03

MR. BORDER: Objection. Outside the scope. 03:43:08 03:43:17

THE WITNESS: I mean, what I cited to about the disclosure for the EAP protocol claim -- 03:43:17 03:43:18 03:43:20

BY MR. MICHALEK: 03:43:23

Q. Can you help me out, just so I know where you are? 03:43:23 03:43:25

A. I'm not looking at any particular place. **03:43:25 03:43:27**

Q. Oh, okay. 03:43:27

A. But what I cited to was a section in Krantz that actually said that it uses the EAP protocol, I think in the manner that I showed the mapping for.

And so -- I don't think I cited to the EAP-radius there. It was just citing to EAP, which is what Krantz says it use. We can -- I can refer you back to our earlier discussion or to, I think, you know, the appropriate claim element in my analysis.

So, I mean, Krantz is teaching what it's teaching, and I provide that mapping in my declaration.

Q. Okay. And we talked about different versions or different EAP protocols that exist.

Would all EAP protocols work with a radius server or would they need to be specially tailored?

MR. BORDER: Objection. Outside the scope.

THE WITNESS: I don't think any of these specs, patents that I've cited as prior art, or the '444 patent get to

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that level of detail. 03:44:35
BY MR. MICHALEK: 03:45:00
Q. Let's go to paragraph 67 in your 03:45:00
report. 03:45:04
And specifically, you talk about 03:45:14
the use of EAP-TLS. And my question is: 03:45:16
What is EAP-TLS? 03:45:20
(Pause for reading/reviewing.) 03:45:51
MR. BORDER: Did you say 03:46:29
paragraph 67 of his report? 03:46:30
MR. MICHALEK: I did. 03:46:31
MR. BORDER: Okay. Thanks. 03:46:32
THE WITNESS: So in networking, 03:46:42
I've seen the acronym TLS refer to 03:46:44
several different things. One thing 03:46:47
I've seen it refer to is the 03:46:49
transport -- transport layer security. 03:46:51
Another thing I've seen it referred to 03:46:53
is transparent LAN service or 03:46:55
transparent LAN protocol. 03:46:58
BY MR. MICHALEK: 03:47:01
Q. What is Krantz using it to refer 03:47:02
to? Do we know? 03:47:05
A. Well, I think it's more along the 03:47:06
lines of security layer. But I -- you 03:47:07

know, that's just what I can recall sitting here right now. 03:47:11 03:47:14

But I don't see where it defines -- well, it's referring to something that's out there. I think that may be what it's referring to. The transparent -- I'm sorry, a transport layer security, if that's the right part of the acronym. 03:47:18 03:47:20 03:47:21 03:47:25 03:47:26 03:47:28 03:47:33

Q. So let's unpack that. So I'm -- I want to make sure I got that. 03:47:33 03:47:36

You've seen TLS referred to as transport layer security and transparent LAN service; is that right? 03:47:37 03:47:40 03:47:42

A. Is it TLS or TLP? Wait. Let me see. 03:47:46 03:47:50

Oh, yeah, yeah. TLS, transparent LAN service and transport layer security. So transparent LAN service is what I've seen it referred to as well. But I don't think that's the right context here. We can look it up. I just don't remember offhand. 03:47:51 03:47:55 03:47:58 03:48:00 03:48:02 03:48:03 03:48:05

Q. Okay. Well, if I'm looking at Krantz alone, does it tell me which one? 03:48:06 03:48:07

A. Well, I think there's just one. There's not an EAP transparent LAN service, I don't think, because the TLS part of that refers to something that's more like a VLAN service or a virtual private network, a VPN service for T -- for transparent LAN service.

But we can just look it up. I don't remember every acronym -- 03:48:13 03:48:15 03:48:19 03:48:22 03:48:25 03:48:29 03:48:32 03:48:39 03:48:41

Q. It's an alphabet soup, right? 03:48:42

A. There are a lot of alphabet -- yeah, there are lots of acronyms. 03:48:44 03:48:46

Q. Where would we look it up if we wanted to? 03:48:47 03:48:49

A. I would look for the spec for it. I would start with the IETF. But I think a person of ordinary skill would be able to find these things without an undue burden. 03:48:50 03:48:52 03:48:57 03:48:58

Q. Okay. Well, let's -- sorry. Tell me one more time. What do you suspect that EAP-TLS stands for, then, based on -- in Krantz? 03:49:02 03:49:05 03:49:08 03:49:12

A. Well, I don't -- I'm not totally sure. But I think if it's one of the more common security-related TLSs, it would be 03:49:12 03:49:15 03:49:17

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the extensible authentication protocol for transport layer security. 03:49:21 03:49:24

But, again, I would want to look it up just to be sure because it is an alphabet soup up -- out there and sometimes they could mean not quite or be some variant that's close, you know. 03:49:29 03:49:30 03:49:31 03:49:34 03:49:37

Q. Well, you say in your report -- this is still paragraph 67, "As explained in more detail, the use of EAP-TLS was a known authentication protocol that would be used to authenticate clients." 03:49:38 03:49:42 03:49:45 03:49:49 03:49:52

The question is: How do you know it was known at the time? 03:49:58 03:50:02

A. Well, the -- I don't think Krantz made it up. It appears in the Krantz specification as of, you know, the filing date, December 6, 2002. 03:50:03 03:50:20 03:50:23 03:50:26

Q. Okay. So your -- I'm trying to get -- do you have any independent basis outside of Krantz, or is it that it's in Krantz? 03:50:29 03:50:31 03:50:32 03:50:35

A. Well, I think, you know -- I've seen EAP referred to. I might not have seen every variant or every related 03:50:36 03:50:39 03:50:41

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protocol, but it's not -- it wouldn't seem that it's -- you know, I don't see why in Krantz it's made up. 03:50:44 03:50:54 03:50:58

It's consistent with, you know, naming of certain protocols with some sub -- you know, additional acronyms after the main or primary part of the acronym. 03:50:59 03:51:02 03:51:05 03:51:07

Q. Have you personally worked with EAP-TLS before? 03:51:14 03:51:16

A. I don't think I have in terms of implementation, but I may have seen it come up in other cases where I dug deeper. But I just don't remember one way or the other. 03:51:19 03:51:25 03:51:27 03:51:32

Q. That actually is a good -- I don't know if we covered this before, but my question is: Do you practice this technology outside of being an expert witness at all? 03:51:33 03:51:35 03:51:38 03:51:40 03:51:45

MR. BORDER: Objection. Form. 03:51:46

THE WITNESS: So I did my PhD work in the networking field. We actually did actually configure networks. And it's part of professional jobs that I had that were related to networking both in building 03:51:47 03:51:50 03:51:51 03:51:54 03:51:57 03:52:00

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products and doing some research afterwards. 03:52:02

I did work and actually physically configure and buy routers and set them up and configured security protocols on them. I set up my own local area network when I started a kids education business that I start, and I configured all of that myself. 03:52:03 03:52:04 03:52:06 03:52:09 03:52:12 03:52:15 03:52:17

I may not have had occasion to use literally the EAP or TLS or EAP-radius or anything. We didn't have a radius server. But, you know -- so -- but I have worked in the area of networking professionally and did research in the field. 03:52:18 03:52:20 03:52:23 03:52:25 03:52:32 03:52:33 03:52:36

BY MR. MICHALEK: 03:52:37

Q. Currently? 03:52:38

A. I sold my business that I did that work for about two years ago now, so I don't have occasion to do that now. But in terms of setting up, we had to redo all the networking several times. **03:52:40 03:52:44 03:52:46 03:52:48 03:52:51**

We had to, you know, redo our phone Asterisk server a couple times, and I **03:52:52 03:52:54**

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literally rolled out some of these implementations myself.

Q. We had a litigation partner at our last firm who did all that stuff himself too.

Let's go to paragraph 93 of your report.

A. Okay.

Q. What -- and it's referred to in -- what's EAP-ZLX?

(Pause for reading/reviewing.)

A. Well, if you look at paragraph 64 of Herrmann.

Q. Let me get there.

Uh-huh. Got it.

A. It talks about how there's an EAP-ZLX extension DLL. That's a dynamic link library. And that DLL is an implementation.

"The EAP-ZLX extension DLL is an implementation of the EAP protocol that is utilized to provide support for security costs and negotiation and enforcement.

"More particularly, the EAP-ZLX extension DLL communicates with another

client-side component of the present invention referred to herein as a policy agent or integrity agent to retrieve information about the current security policy in operation on the client device." 03:55:35 03:55:37 03:55:39 03:55:42 03:55:43

And it goes on, but that's -- that's what Herrmann is describing EAP-ZLX and the extension DLL. 03:55:46 03:55:48 03:55:53

Q. Outside of Herrmann, do you have any opinion as to what EAP-ZLX is? 03:55:55 03:55:57

A. Not from memory. 03:56:00

Q. Is EAP -- 03:56:05

A. I could look it up. 03:56:06

Q. Where would we look it up at? 03:56:07

A. I would look for wherever the EAP protocols are published. And I think a person of ordinary skill would be able to find that information without undue burden. 03:56:08 03:56:10 03:56:15 03:56:16

Q. Okay. Look at paragraph 9 of Herrmann, then, where it says, "For further information regarding EAP" -- I'll wait for you. 03:56:19 03:56:22 03:56:25 03:56:29

Are you there? 03:56:31

A. Yes. 03:56:31

Q. "For further information 03:56:32

regarding EAP, see, e.g., RFC 228." 03:56:34

And then I guess it says by the 03:56:38

Internet Engineering Task Force, the IETF. 03:56:40

And I think you mentioned that earlier. 03:56:45

A. Yes. That's the first place I 03:56:47

said I'd look. 03:56:48

Q. Okay. I'm going to mark as 03:56:49

Exhibit A. I'm marking as Exhibit A a 03:56:52

document which is entitled PPP Extensible 03:57:03

Authentication Protocol, EAP. 03:57:07

Do you see -- 03:57:12

MR. BORDER: I think we need to 03:57:12

mark this as the next exhibit, so, 03:57:13

like -- 03:57:16

MR. MICHALEK: I don't want to 03:57:16

call it -- 03:57:17

MR. BORDER: For you -- for your 03:57:17

exhibits. 03:57:19

THE WITNESS: Exhibit 1 to the 03:57:21

deposition? 03:57:22

MR. BORDER: So there's a -- 03:57:23

MR. MICHALEK: I don't want to 03:57:24

overwrite a petition exhibit, though. 03:57:25

MR. BORDER: Oh, this is a 03:57:29

Petition exhibit? 03:57:29

MR. MICHALEK: No, it's not. 03:57:30
Can we go off for a second? 03:57:32
(Whereupon, discussion held off 03:57:35
the record.) 03:58:58
(Whereupon, Exhibit 2600 is 03:58:58
marked for identification.) 03:58:59
MR. MICHALEK: Okay. We're back 03:58:59
on the record. 03:59:01
BY MR. MICHALEK: 03:59:01
Q. Dr. Houh, I've marked for you 03:59:02
Exhibit 2600, a document entitled "PPP 03:59:03
Extensible Authentication Protocol (EAP)." 03:59:06
And do you see in the top corner 03:59:09
it says, Networking -- "Network Working 03:59:11
Group request For Comments: 2284"? 03:59:14
Do you see that? 03:59:16
A. Yes. **03:59:17**
Q. Have you seen this document 03:59:18
before? 03:59:19
A. I think it's highly likely that I have, yes. **03:59:19** **03:59:24**
Q. Where? 03:59:26
A. As part of my professional work and my work doing cases like this. **03:59:26** **03:59:29**
Q. Is it your understanding that 03:59:31

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this is the document that's referenced in paragraph 9 of Herrmann? 03:59:35 03:59:37

A. Yes. **03:59:40**

Q. And you see that in paragraph 9 of Herrmann it says, "The disclosure of which is hereby incorporated by reference"? 03:59:41 03:59:47 03:59:49

A. Yes. **03:59:52**

Q. Have you reviewed this document in the context of your engagement in this case? 03:59:52 03:59:55 03:59:57

A. I don't remember. But it's all possible that I reviewed this prior to this case. But I don't know exactly which it is. I think it's more likely that I've seen this before this case. **03:59:58 04:00:08 04:00:14 04:00:16 04:00:18**

Q. Before this case, not in conjunction with your engagement for this case? 04:00:19 04:00:21 04:00:23

A. Yes. I think that's probably correct, but I'm not sure I can be 100 percent certain on that. **04:00:24 04:00:26 04:00:28**

Q. Okay. Well, I think we were talking about EAP-ZLX in Herrmann, and my question before that was: Outside of Herrmann, have you seen reference to 04:00:31 04:00:35 04:00:39 04:00:42

EAP-ZLX anywhere else? 04:00:45

A. I mean, I don't remember that one way or the other. **04:00:48 04:00:52**

Q. You have not seen EAP-ZLX outside of Herrmann? 04:00:55 04:00:57

MR. BORDER: Objection. 04:00:58

Foundation. 04:00:59

BY MR. MICHALEK: 04:01:33

Q. You're shrugging. I'm trying to get an answer. 04:01:02 04:01:03

A. Yeah, I understand. I don't know one way or the other. I could have. I couldn't have. I don't -- I don't think it's any more likely one way or the other, but I -- that's -- that's off the top of my head. I just don't know. I don't have a memory of it. **04:01:04 04:01:05 04:01:07 04:01:08 04:01:11 04:01:14 04:01:17**

When you showed me this, I do recall, you know, a vague memory of this document, but without more prompting, I wouldn't know how to gauge one way or the other. **04:01:23 04:01:24 04:01:26 04:01:30 04:01:32**

Q. Okay. But when I asked you before where I would go to get more information about EAP-ZLX, you agreed 04:01:33 04:01:34 04:01:36

paragraph 9 of Herrmann, the document there, would be the document we would look to, right? 04:01:38 04:01:40 04:01:41

A. For EAP, which is what's cited -- 04:01:42

Q. EAP-ZLX. 04:01:45

A. Did I say that for EAP-ZLX? I think I said I -- I'd look to the same place, which earlier I said I would look for documents in -- put out by the IETF. 04:01:51 04:01:54 04:01:56 04:01:58

Q. Okay. I'll read back to you the transcript. 04:02:04 04:02:06

My question: "Outside of Herrmann, do you have an opinion as to what EAP-ZLX is?" 04:02:07 04:02:09 04:02:11

Your answer was: "Not from memory. I could look it up." 04:02:12 04:02:13

My question: "Where would we look it up at?" 04:02:20 04:02:21

Your answer was: "I would look for wherever the EAP protocols are published, and I think a person of ordinary skill would be able to find that information without undue burden." 04:02:21 04:02:23 04:02:25 04:02:27 04:02:28

My question was: "Okay. Look at paragraph 9 of Herrmann, then where it says 04:02:30 04:02:31

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'For further information regarding EAP.'" 04:02:33

And then your answer was: "Yes, that's the first place I said I would look." 04:02:38 04:02:40 04:02:42

So I want to look at Exhibit 2600, and I want you to identify whether you see any information regarding EAP-ZLX in it. 04:02:43 04:02:47 04:02:48 04:02:51

A. Well, you were asking about EAP, not EAP-ZLX, the second question about that paragraph 9 of Herrmann. But I'll look -- I'll look through here for EAP-ZLX. **04:02:55 04:02:57 04:03:00 04:03:04**

(Pause for reading/reviewing.) **04:03:14**

A. I mean, I took a quick look. I don't see a reference to EAP-ZLX within this Exhibit 2600. **04:03:37 04:03:39 04:03:41**

Q. Would it surprise you if I told you that I took a look, and I didn't see any reference to EAP-ZLX either? 04:03:43 04:03:45 04:03:47

A. Wouldn't surprise me. But IETF publishes a lot of RFCs. There's over 10,000 of them, and other Internet drafts and things like that. **04:03:50 04:03:54 04:03:57 04:03:58**

So this is only one of thousands of potential IETF documents, all of which **04:03:59 04:04:01**

are searchable and readily found going to the -- I have a number of links to RFC trackers and RFC search sites. 04:04:05 04:04:10 04:04:12

Q. But before, it was your sworn testimony that if I wanted more information about EAP-ZLX, I should look at the document in Herrmann 9, right? 04:04:15 04:04:17 04:04:19 04:04:22

A. I think you're misinterpreting what I said there. You asked me about where -- looking at EAP, and this does give more information about EAP, and that's what -- that's what Herrmann says. 04:04:24 04:04:27 04:04:30 04:04:32 04:04:34

You asked me separately about EAP-ZLX, and I told you I'd look at the same place where other EAP protocols are also published. 04:04:37 04:04:38 04:04:41 04:04:44

And so I would do further looking within the RFCs if there's a -- you know, for something that talked about EAP-ZLX. I didn't say that this document talked about EAP-ZLX. This is -- this is titled "PPP Extensible Authentication Protocol." 04:04:46 04:04:48 04:04:52 04:04:54 04:04:57 04:05:01

Q. In paragraph 93 in your report, you say, "This is the same protocol used in Krantz." 04:05:04 04:05:09 04:05:13

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Do you see that? 04:05:13

A. Yes. **04:05:19**

Q. Krantz doesn't describe EAP-ZLX, 04:05:21

does it? 04:05:26

A. I mean, I did refer back to 64, but that talks about EAP-ZLX extension DLL and what's in that, which is an implementation of the EAP protocol. So -- **04:05:27 04:05:48 04:05:55 04:05:57**

Q. Krantz -- 04:05:59

A. So it does describe -- Krantz does describe EAP-ZLX at some level. **04:06:00 04:06:03**

Q. Where? 04:06:05

A. Paragraph 64. **04:06:06**

Q. Please point out the language to 04:06:08

me, please. 04:06:10

A. "The client-side components of the present invention include the EAP-ZLX extension DLL and the policy integrity" -- **04:06:12 04:06:16 04:06:18**

Q. I think you're reading from 04:06:21

Herrmann. Right? 04:06:23

A. Oh, I'm sorry. I'm -- **04:06:23**

Q. Let's take a step back. 04:06:25

A. All right. All right. All right. **04:06:27 04:06:28**

Q. Let's take a step back to my 04:06:28

question.
A. Okay.
Q. My question is about Krantz.
A. All right.
Q. And specifically in the context of your paragraph 93, which says, "This is the same protocol utilized in Krantz."
And my question is: Krantz doesn't disclose EAP-ZLX, does it?
A. Okay. All right. Sorry. I -- I'll try to better distinguish in my head when you ask questions between the references.
MR. BORDER: You said paragraph 93?
MR. MICHALEK: Yes.
THE WITNESS: Of my report, right?
Okay. So -- sorry. Which one is this?
So Krantz does disclose sending an extensible authentication protocol, EAP, message.
BY MR. MICHALEK:
Q. Where are you reading? I'm

sorry. 04:08:06

A. Paragraph 18 of Krantz. And then it says at the end, you know, "The access point may also be configured to block communications from the client that uses protocols other than EAP and 802.1x." So it's clear that the access point is -- is using one example and Krantz is -- it's using EAP. And my point here is that Herrmann now, so sorry for the confusion. I understand you're jumping back and forth between them. 64, Herrmann -- of Herrmann says that the EAP-ZLX extension DLL is an implementation of the EAP protocol that is utilized to provide support for a security policy. So I'm saying that that EAP protocol is the same, what I say in 94, and I stand by it, which is that it's the EAP protocol used -- utilized in Krantz where Krantz talks about using the E-A-P protocol, or EAP protocol. And Herrmann talks about the ZL 04:08:08 04:08:14 04:08:18 04:08:20 04:08:22 04:08:26 04:08:28 04:08:33 04:08:36 04:08:38 04:08:41 04:08:43 04:08:44 04:08:47 04:08:51 04:08:53 04:08:57 04:08:57 04:08:59 04:09:03 04:09:05 04:09:10 04:09:12 04:09:14

-- EAP-ZLX extension DLLs and implementation of the EAP protocol. So I'm relating those things.

Q. But they're not the same?

A. It's an implementation --

MR. BORDER: Object to the form.

THE WITNESS: Herrmann says that the ZLX extension DLL is an implementation of the EAP protocol. That's what it says. It says right here --

BY MR. MICHALEK:

Q. What's an implementation mean? Is it the same thing?

MR. BORDER: Objection to form.

THE WITNESS: An implementation is a specific instance where someone has written. In this DLL, it's -- this extension DLL is an implementation of an EAP protocol. So it's a software library that what Herrmann says implements the EAP protocol.

BY MR. MICHALEK:

Q. Have you analyzed EAP-ZLX at all?

A. I'm going by the teaching here in

Herrmann, which is simply that says that the EAP-ZLX extension DLL is an implementation of the EAP protocol that is utilized to provide support for security policy, negotiation, and enforcement.

So that is -- what I'm saying is that EAP protocol that the EAP-ZLX DLL implements is the same EAP protocol that's described in Krantz in paragraph 18. That's what I'm saying here.

Q. Okay. Other than what's in Herrmann, have you analyzed EAP-ZLX?

A. I simply use the teachings of Herrmann in my analysis.

Q. Do you know what ZLX stands for?

A. I don't think so.

Q. Do you think it might stand for zone labs?

A. It could. I don't remember trying to hunt that down. It's simply saying it's an implementation of each protocol.

Q. You don't know?

A. Well, I think we could look it up. All these things --

Q. Where would we look it up? 04:11:07

A. All these things, we could look it up. **04:11:09** **04:11:10**

MR. BORDER: Objection. Outside the scope. 04:11:11 04:11:11

THE WITNESS: So, you know, I didn't testify to this, but I would start -- start at, for example, IETF and do some searching beyond that. 04:11:11 04:11:12 04:11:14 04:11:22

BY MR. MICHALEK: 04:11:25

Q. You talked about the radius server earlier. 04:11:26 04:11:29

How would -- how would we make sure that something like EAP-ZLX could work with any number of radius servers? 04:11:30 04:11:32 04:11:36

MR. BORDER: Objection. Outside the scope. 04:11:37 04:11:38

THE WITNESS: I don't think I've provided any, you know -- anything in my declaration about that kind of thing. But I have provided testimony that the combination of Herrmann and Krantz would be straightforward and accessible and doable by a person of ordinary skill. 04:11:38 04:11:41 04:11:43 04:11:48 04:11:52 04:11:53 04:11:58 04:12:00

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I'll point you to my declaration because I don't remember exactly the words, but it's -- it's -- it's just integrating pieces of software. And even if there are some -- there's no teaching away. 04:12:00 04:12:02 04:12:03 04:12:05 04:12:08 04:12:13

I understand that, you know, there's some discussion or the patent owner may take the position that there's some problem with this combination, but it's integrating software and that's -- you know, the issues to deal with with integrating pieces of software are very straightforward and done by software developers on a routine basis. 04:12:14 04:12:16 04:12:19 04:12:20 04:12:21 04:12:24 04:12:28 04:12:30 04:12:32 04:12:33

BY MR. MICHALEK: 04:12:34

Q. With respect to EAP-ZLX, if I wanted to combine it and pair with a radius server, what kind of information would I need to know? 04:12:35 04:12:37 04:12:41 04:12:43

MR. BORDER: Objection. Outside the scope. 04:12:43 04:12:47

THE WITNESS: Well, you would do the kinds of things that software 04:12:47 04:12:48

engineers are trained to do when integrating software. So --

BY MR. MICHALEK:

Q. Would I have to know what the -- know where to look it up, the information? Is that one thing?

A. I mean, software developers look up documentation all the time if they have to look up something; so...

Q. Okay. With respect to -- excuse me.

With respect to Herrmann, paragraph 14 -- if you want to turn to paragraph 14 of Herrmann.

It states toward the bottom, "The solution should also work in conjunction with various different EAP authentication mechanisms, e.g., EAP-5MD 5, EAP-OTP, EAP-GTC, and the like."

Do you see that?

A. Yes.

Q. Have you offered any testimony in your report about those EAP authentication mechanisms? And if so, can you point it to me?

A. I mean, I don't recall. I mean, if you have done a search, you would be able to tell that much faster than I could, if you want me to flip through my declaration. But I don't recall that offhand. 04:13:50 04:13:53 04:13:56 04:13:58 04:14:00 04:14:01

Q. I'll ask it, do you know what they are, those EAP authentication mechanisms? 04:14:01 04:14:03 04:14:05

A. Well, MD5 is a very common hashing function. I can -- I can make an educated, you know, statement about OTP. I don't remember offhand. We can look these things up. 04:14:07 04:14:11 04:14:17 04:14:27 04:14:29

Q. We'd have to look them up? 04:14:29

A. I don't remember everything I read, especially these alphabet soup, as you call it. But it might stand for one-time password. But we could check that. I don't -- I don't recall off the top of my head. But I'm pretty sure MD5 refers to the MD5 hash algorithm. 04:14:31 04:14:37 04:14:40 04:14:42 04:14:45 04:14:47 04:14:50

Q. Do you know if companies sometimes make up their own -- develop their own EAP protocols? 04:14:57 04:14:59 04:15:01

MR. BORDER: Objection. Outside the scope. 04:15:02 04:15:03

THE WITNESS: I mean, if they wanted to, they could do something and have a private extension or some mechanism based on EAP, but I don't think it would be EAP anymore. 04:15:03 04:15:10 04:15:12 04:15:16 04:15:19

BY MR. MICHALEK: 04:15:25

Q. Why not? 04:15:25

A. If they change the fundamental underpinnings of the protocol itself. **04:15:26 04:15:26**

Q. Yeah, but what if they make their own extension and tailor it? Do they do that? I don't know. 04:15:29 04:15:31 04:15:33

A. I mean, I don't testify as to anything like that in my -- in my deposition, except for when you combine things, it's still obvious to combine. Just because a company wouldn't do it doesn't mean it's not obvious. **04:15:34 04:15:36 04:15:41 04:15:42 04:15:45 04:15:47**

There are lots of things that are obvious for a POSITA to do. You don't have to end up with a standard as the end result of that combination. **04:15:48 04:15:50 04:15:56 04:15:59**

Q. Let's go to paragraph 64 of your 04:16:06

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report. 04:16:08

A. Okay. **04:16:23**

Q. I guess it starts with the first line, "Herrmann's technique of checking connecting computer systems for antivirus software as it would not only provide added security, but increased automation when connecting to a network." 04:16:23 04:16:25 04:16:29 04:16:31 04:16:33 04:16:36

Do you see that, that sentence? 04:16:37

A. Yeah. I think so. But I wasn't looking at it when you started reading. **04:16:41** **04:16:43**

Q. Okay. 04:16:45

A. But I think I see it now. **04:16:45**

Q. Well, I'm just going to ask a question about it. 04:16:46 04:16:48

Do you know how Herrmann would do the technique of checking connecting computer systems for antivirus software? 04:16:49 04:16:50 04:16:53

(Pause for reading/reviewing.) 04:18:07

A. Well, I think Herrmann discloses how to check for antivirus software at least at the same level as the '444 patent does. **04:18:09** **04:18:15** **04:18:17** **04:18:20**

Q. Where are you pointing to on Herrmann? 04:18:22 04:18:24

A. Well, I'm just stating generally that I don't think the '444 patent gets into the exact details of how. It simply says -- it says things like -- 04:18:24 04:18:26 04:18:30 04:18:34

Q. My question's about Herrmann, though. 04:18:35 04:18:37

A. I understand. 04:18:38

Q. Where in Herrmann can I find it? 04:18:38

A. The same knowledge of a person of ordinary skill in the art to do how to do that as one does it looking at the '444 patent can be applied to Herrmann, because I think Herrmann -- it says at least as much as -- about how to do that as the '444 patent does. 04:18:40 04:18:43 04:18:43 04:18:45 04:18:47 04:18:51 04:18:54

Q. How does Herrmann -- I'll quote you. 04:18:54 04:18:59

"Herrmann's technique of checking connecting computer systems for antivirus software as it would not only provide added security but increase automation when connecting to a network." 04:19:00 04:19:01 04:19:04 04:19:06 04:19:09

How does Herrmann check for antivirus software? 04:19:11 04:19:13

A. Where are you -- were you reading 04:19:14

from my -- **04:19:16**

Q. Paragraph 64, we're still on. 04:19:16

A. Yeah. It checks the same way someone reading the '444 patent would understand the system or the clients check. **04:19:22** **04:19:23** **04:19:25**

Q. What are you referring to in Herrmann to -- as your basis for that statement. 04:19:28 04:19:29 04:19:31

(Pause for reading/reviewing.) 04:20:03

A. Well, I'm just stating generally that I think the level of disclosure as to how to determine what antivirus software is running on a client devices is similar in both the '444 specification, from what I remember, and from Herrmann, from what I remember. **04:21:50** **04:21:52** **04:21:55** **04:21:58** **04:22:00** **04:22:03** **04:22:04**

So in terms of how do they do it, well, a person of ordinary skill looking at the '444 patent to use -- you know, to say how to do it would apply their same level of skill and knowledge to the -- looking at Herrmann as to how to do it. That's what I'm saying. **04:22:04** **04:22:07** **04:22:09** **04:22:12** **04:22:14** **04:22:17** **04:22:19**

Q. Okay. That's fair enough. 04:22:20

But there's no paragraph you want 04:22:21

to give me in Herrmann right now that I could look at? 04:22:22 04:22:25

A. I mean, I can't find anything as I'm scanning through right now, but Herrmann's kind of long, so I haven't had a chance to look through it all yet for the purpose of answering this particular question. **04:22:25 04:22:27 04:22:29 04:22:31 04:22:33 04:22:35**

Q. Let's go to paragraph 70 of Herrmann. 04:22:37 04:22:39

It says -- actually, before we go to 70, are you familiar with policy enforcement, the phrase being enforced on the client side versus being enforced on the server side? Is that the nomenclature? Did I get it right? 04:22:44 04:22:47 04:22:51 04:22:55 04:22:58 04:23:00

A. I don't think I've really discussed that much in my declaration, but sure. I mean, there's some policies that could be enforced in different places. **04:23:02 04:23:06 04:23:09 04:23:10**

Q. Like where? 04:23:12

A. Well, it depends what policies. **04:23:16**

Q. Okay. In one example, could a policy enforcement occur on the client device? 04:23:19 04:23:23 04:23:25

A. It depends what the policy is. **04:23:26**

Q. Okay. Let's go to paragraph 70 04:23:29
of Herrmann. It says, "In the currently 04:23:36
preferred embodiment, security and 04:23:42
behavioral policy definition and 04:23:45
enforcement," and I skip the paren, but 04:23:47
"are provided by the true vector engine 04:23:51
available from Zone Labs and described in 04:23:54
further detail in commonly owned U.S. 04:23:55
Patent Number 5,987,611." 04:23:57

Do you see that? 04:24:01

A. Yes. **04:24:01**

Q. And then it says below that the 04:24:03
'611 patent's incorporated by reference. 04:24:06

Do you see that? 04:24:09

A. Yes. **04:24:10**

Q. Okay. I'm going to mark the '611 04:24:11
patent as Exhibit 2601. 04:24:13

(Whereupon, Exhibit 2601 is 04:24:15
marked for identification.) 04:24:57

BY MR. MICHALEK: 04:24:57

Q. Dr. Houh, do you have 04:24:58
Exhibit 2601 in front of you? 04:25:00

A. Yes. **04:25:01**

Q. Have you reviewed this document 04:25:02

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before? 04:25:04

A. I mean, I may have. I don't have a specific memory, but... 04:25:48 04:25:50

Q. This document was incorporated into Herrmann by way of reference, correct? 04:25:53 04:25:54

A. Yes. 04:25:56

Q. But you don't -- do not know definitively whether or not you reviewed it for the purpose of this engagement? 04:25:56 04:25:59 04:26:01

A. Well, I do try to review all the exhibits that I reference or cites that are part of my -- but, again, I don't remember everything I review. So I don't have a specific memory of it. 04:26:02 04:26:04 04:26:07 04:26:10 04:26:16

Q. Turn to Column 12 of the Exhibit 2601, please. 04:26:17 04:26:19

And specifically starting at line 45 states, "The present invention provides system and methods for client-based monitoring and filtering of access which operates in conjunction with a centralized enforcement supervisor. 04:26:33 04:26:35 04:26:40 04:26:43 04:26:45 04:26:48

"In accordance with the present invention, a central filter is not employed. Instead, the present invention 04:26:52 04:26:53 04:26:57

provides a client-side filter that is controlled by the centralized authority as long as the centralized authority has a way of enforcing noncompliance, for example, by blocking access to the WAN." 04:26:59 04:27:02 04:27:05 04:27:07 04:27:11

Do you see that section of Exhibit 2601, Dr. Houh? 04:27:14 04:27:17

A. Yes. **04:27:21**

Q. What is -- do you know what a central filter is? 04:27:22 04:27:24

A. Well, I would need time -- **04:27:28**

MR. BORDER: Objection. Outside the scope. 04:27:39 04:27:41

THE WITNESS: I would need time to look through this specification. Do you want me to do that now. 04:27:41 04:27:42 04:27:44

BY MR. MICHALEK: 04:27:45

Q. You're free to. My question is more, as an expert or a person of ordinary skill in the art, does central filter mean anything to you from a plain and ordinary meaning -- strike that. Strike that. 04:27:45 04:27:47 04:27:53 04:27:55 04:27:57

As a person of ordinary skill in the art, are you familiar with the term "central filter"? 04:28:00 04:28:04 04:28:06

MR. BORDER: Objection. Outside the scope. 04:28:08 04:28:09

THE WITNESS: I think it's just what the words say they mean. They don't invoke any particular non-generic thing, so it would just be what the words mean. 04:28:09 04:28:10 04:28:12 04:28:18 04:28:19

BY MR. MICHALEK: 04:28:20

Q. Okay. 04:28:20

A. I think that's -- but I would want to consider that in the context of this specification. But if I were looking at that in isolation, it doesn't -- it wouldn't evoke anything particular, like if I said, you know, radius server. **04:28:20 04:28:21 04:28:23 04:28:25 04:28:32 04:28:34**

Q. And then it's -- they talk about a client-side filter as well. Again, same question: Does that resonate with you as a person of ordinary skill in the art? 04:28:39 04:28:41 04:28:43 04:28:47

MR. BORDER: Objection. Outside the scope. 04:28:48 04:28:49

THE WITNESS: Well, at first glance, I would look at that as, you know, what the words say they mean, what they -- what -- meaning what they 04:28:49 04:28:52 04:28:55 04:28:57

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say. So -- but I would want to consider the overall context for a more detailed answer. 04:28:59 04:29:00 04:29:05

BY MR. MICHALEK: 04:29:06

Q. So with respect to central filter, it says a central filter is not employed. 04:29:09 04:29:10 04:29:12

Would it be fair to say that a central filter is referring to something on the server side? 04:29:13 04:29:15 04:29:21

MR. BORDER: Objection. Outside the scope. 04:29:22 04:29:23

THE WITNESS: I don't think I mapped any filter to any of my obviousness position. We can look at that, but -- we can talk about filter if you want here, but filter is the -- the meaning is what it says it means. I mean, it's... 04:29:23 04:29:23 04:29:27 04:29:29 04:29:33 04:29:36 04:29:39

BY MR. KUO: 04:29:41

Q. Okay. Other than that, you don't have an opinion on this section of Exhibit 2601? 04:29:41 04:29:42 04:29:45

A. I don't think what we looked at just now affects any of my analysis or **04:29:50 04:29:52**

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changes any of opinions here in this declaration. 04:29:53 04:29:55

BY MR. MICHALEK: 04:29:56

Q. I didn't ask that. 04:29:56

Do you have any additional opinion regarding this section -- 04:29:57

MR. BORDER: Objection. 04:29:58

BY MR. MICHALEK: 04:29:58

Q. -- that you would like to offer? 04:29:59

MR. BORDER: Objection. Outside the scope. 04:30:00

THE WITNESS: I mean, I haven't offered any opinions about this section at all in my declaration. 04:30:01

BY MR. MICHALEK: 04:30:07

Q. Let's go to Column 2 of Exhibit 2601. Line 28 says, "Both strategies are based on a centralized filter mechanism with most of the filtering work being performed at the server as opposed to the individual client PCs. Such an approach is problematic, however, because of the centralized nature of firewalls and proxy servers. Each approach extracts significance -- significant 04:30:07 04:30:20 04:30:23 04:30:26 04:30:28 04:30:31 04:30:34 04:30:36 04:30:39 04:30:41

performance penalties." 04:30:44
Do you see that? 04:30:45
And then towards the bottom it 04:30:46
says, "This represents a major bottleneck 04:30:48
to overall system performance." 04:30:51
Do you see that? 04:30:53
A. I mean, sure, I see it. **04:30:55**
Q. As a person of ordinary skill, do 04:31:03
you have any impression of what significant 04:31:06
performance penalty means in the context of 04:31:07
network access control? 04:31:10
MR. BORDER: Objection. Outside 04:31:11
the scope. 04:31:11
THE WITNESS: This doesn't affect 04:31:11
any of my opinions about my 04:31:16
combinations, but I didn't provide any 04:31:17
opinions about this section in my 04:31:23
declaration. 04:31:24
BY MR. MICHALEK: 04:31:26
Q. As a person of ordinary skill in 04:31:28
the art -- it says "major bottleneck." 04:31:30
Does -- does that resonate with you as a 04:31:35
person of ordinary skill in the art in the 04:31:38
network access control space? 04:31:39
MR. BORDER: Objection. Outside 04:31:41

the scope. 04:31:41
THE WITNESS: I didn't provide an 04:31:41
opinion about that in my declaration. 04:31:46
BY MR. MICHALEK: 04:31:50
Q. We talked about a radius server 04:31:51
before, right? 04:31:53
A. Sure. **04:31:54**
Q. Would a radius server be 04:31:55
considered a centralized filter? 04:31:58
MR. BORDER: Objection. Outside 04:31:59
the scope. 04:32:03
THE WITNESS: I don't think I 04:32:03
discussed the notion of filter in 04:32:04
conjunction with radius in my 04:32:05
declaration anywhere. 04:32:07
BY MR. MICHALEK: 04:32:08
Q. You don't know? 04:32:08
MR. BORDER: Objection. Same 04:32:10
objection. 04:32:12
THE WITNESS: I would look at 04:32:12
the -- I don't have any context for 04:32:13
that with respect to the opinions that 04:32:15
I have and the references I relied on. 04:32:19
BY MR. MICHALEK: 04:32:35
Q. Turning to paragraph 8 of 04:33:01

Herrmann. Let me know when you're there. 04:33:03

A. Okay. **04:33:25**

Q. Okay. The fourth line down, it 04:33:25
starts, "Accordingly, a network access 04:33:28
server environment generally includes one 04:33:31
or more client devices (computers) trying 04:33:32
to gain access to a network, a network 04:33:34
access server (NAS), which provides access 04:33:36
to the network, and a primary 04:33:40
authentication server to provide 04:33:41
centralized authentication services to the 04:33:43
NAS for authenticating client devices 04:33:45
before they are granted access to the 04:33:49
network." 04:33:51

Do you see that? 04:33:51

A. Yes. **04:33:51**

Q. When they talk about a "primary 04:33:52
authentication server," would one example 04:33:55
be a radius server? 04:33:57

A. I mean, I don't think I relied on 04:34:05
anything here with respect to Herrmann, 04:34:11
which really is -- I talk about the -- that 04:34:13
there's an agent and that the agent is 04:34:16
doing it -- an audit of the antivirus 04:34:18
software. **04:34:23**

So I don't know how this would affect anything, but I don't think I testified about this section in my declaration. If you think I did, I'd be happy to look at it, but I don't think I did. 04:34:24 04:34:26 04:34:28 04:34:31 04:34:34 04:34:36

Q. That's fine. If it's outside -- if it's not in your declaration, then you're not offering an opinion with respect to this portion of Herrmann? 04:34:36 04:34:38 04:34:39 04:34:41

A. I mean, I offered my opinions that I offered, and that's what's in my declaration. 04:34:44 04:34:46 04:34:50

Q. All right. I think we can move a little quicker and try to do this. 04:34:56 04:34:57

MR. BORDER: What's your time on the record? 04:35:03 04:35:05

(Whereupon, discussion held off the record.) 04:35:14 04:35:23

MR. MICHALEK: Let's go off really quick. 04:35:32 04:35:34

(Whereupon, a recess was taken at 4:35 p.m.) 04:35:35 04:37:37

MR. MICHALEK: We're back on the record here. 04:37:37 04:37:40

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BY MR. MICHALEK: 04:37:42

Q. Okay. Let's look at Herrmann paragraph 70. We've already looked at this. If you go towards the bottom, it talks about another document that's been incorporated by reference, which is identified as commonly owned application serial number 10/159,820. 04:37:43 04:37:46 04:37:50 04:37:52 04:37:55 04:38:00 04:38:03

Do you see that? 04:38:07

A. I'm sorry. Where are you again? **04:38:13**

Q. Sure. No problem. Paragraph 70 of Herrmann. 04:38:15 04:38:17

A. Okay. **04:38:30**

Q. And I'm asking about the incorporated-by-reference application number 10/159,820. 04:38:30 04:38:31 04:38:34

Do you see that? 04:38:36

A. Yes. **04:38:38**

Q. Have you reviewed that commonly owned application in the context of this engagement? 04:38:38 04:38:41 04:38:44

A. I don't have a memory of it. I may not have. **04:38:47 04:38:49**

Q. If I showed you the document, would that help refresh your memory? 04:38:51 04:38:54

A. It might. But these things all look alike. I look at a lot of applications. They all look alike. 04:38:55 04:38:57 04:38:59

Q. Okay. I'll mark it, then. 04:39:01

(Whereupon, Exhibit 2602 is marked for identification.) 04:39:06 04:39:24

MR. MICHALEK: I'm marking as Exhibit 2602. 04:39:24 04:39:26

BY MR. MICHALEK: 04:39:50

Q. Please thumb through that, Dr. Houh. 04:39:50 04:39:52

A. I don't know. I can't -- I can't tell you one way or the other -- 04:40:17 04:40:19

Q. Let me ask the question. 04:40:20

A. Okay. 04:40:20

Q. Does reviewing Exhibit 2602, does that refresh your memory whether you reviewed this document in the context of this engagement? 04:40:22 04:40:24 04:40:25 04:40:27

A. I don't think it really helps. They look similar. Even the figures look vaguely familiar. So it's hard to say one way or the other. 04:40:29 04:40:33 04:40:35 04:40:38

Q. Okay. Marking as 2603. 04:40:41

///

(Whereupon, Exhibit 2603 is marked for identification.) 04:40:43 04:40:53

BY MR. MICHALEK: 04:40:53

Q. I'm representing to you Exhibit 2603 has the application serial number 09/944,057. 04:40:54 04:40:56 04:40:59

And my question, once you've had an opportunity to thumb through and review it, is whether you've reviewed this document in the context of your engagement for this case. 04:41:02 04:41:04 04:41:05 04:41:07 04:41:11

A. I just don't remember one way or the other. **04:41:47 04:41:52**

Q. Let's go to paragraph 122 of your report. 04:41:53 04:41:59

A. Okay. **04:42:11**

Q. You see you talk about, quote, an IA_heartbeat. 04:42:11 04:42:16

Do you see that? 04:42:20

A. I see that. **04:42:27**

Q. What is an IA_heartbeat? 04:42:29

A. If you look at Herrmann paragraph 80. **04:43:39 04:43:41**

Q. Okay. 04:43:48

A. Herrmann is describing that the **04:43:48**

policy server is notified by the client, for example, through an IA_heartbeat message, which is a periodic status message sent from the client directly to the policy server. So that's what -- that's what Herrmann is describing this message as, at least in this section. 04:43:53 04:43:57 04:44:00 04:44:03 04:44:05 04:44:09 04:44:11

Q. What's the data packet or the frame of the IA_heartbeat? 04:44:12 04:44:14

A. Well, it's one sufficient to -- disclosed to the server that the -- that the client has established compliance with the required policy. 04:44:19 04:45:03 04:45:08 04:45:10

And that's because -- that's how this message is described as determining -- that's how -- that's how paragraph 80 describes that the server detects compliance with the required policy through the -- through, you know -- after taking the necessary steps to comply, notifying the client using this message, which is a -- sent periodically directly to the policy server. 04:45:12 04:45:14 04:45:21 04:45:24 04:45:27 04:45:30 04:45:36 04:45:38 04:45:43 04:45:45

And then it -- it then can -- policy server can verify that the client is 04:45:46 04:45:49

indeed in compliance with the assigned policy. And so it has the information sufficient to do what's described here in paragraph 80. 04:45:51 04:45:53 04:45:56 04:46:00

Q. Is there any information about an IA_heartbeat outside of Herrmann that you're aware of in the industry? 04:46:01 04:46:05 04:46:07

MR. BORDER: Objection. Outside the scope. 04:46:09 04:46:10

THE WITNESS: I mean, there could be. But what's being described here is that this is part of this process to determine compliance with required policy. 04:46:10 04:46:31 04:46:33 04:46:38 04:46:40

And that's what Herrmann is teaching about the IA_heartbeat message that's used in paragraph 80. 04:46:41 04:46:43 04:46:45

BY MR. MICHALEK: 04:46:47

Q. Go to Figure 4 of Herrmann. 04:46:49

You rely on Figure 4, right? 04:46:54

A. Yes, that's right. 04:46:56

Q. It says "radius Server 330." 04:47:14

Do you see that? 04:47:17

A. In Figure 4, which is an embodiment of the -- of the invention, 04:47:19 04:47:41

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there is a box that's labeled "Radius Server." 04:47:45 04:47:49

Q. And we've talked about radius server already today, right? 04:47:49 04:47:53

A. Yes. 04:47:53

Q. Is this the same radius server that is in Krantz server 215? 04:47:54 04:47:56

A. Well... 04:48:08

(Pause for reading/reviewing.) 04:49:28

A. I mean, I don't think I -- I'm not -- I'm not relying on this radius server in Herrmann. But what I'm relying on in Herrmann is with respect to the agent, the security policy agent of Herrmann, adding that to the client device of Krantz. 04:49:29 04:49:34 04:49:37 04:49:39 04:49:42 04:49:44 04:49:46

And I do talk about how there are similar components and -- between the two that -- I don't think I'm relying at all on any particular -- this radius server in Herrmann. 04:49:46 04:49:48 04:49:53 04:49:55 04:49:58

Q. Well, let's go to that. 04:49:58

Paragraph 124 of your report, you testify -- that's the wrong paragraph. One second. 04:50:00 04:50:02 04:50:15

Oh, there you go. 04:50:16

Paragraph 124 you say, "Such server components in Herrmann are similar to the gatekeeper of Krantz." 04:50:20 04:50:23 04:50:24

What are you referring to there? 04:50:27

A. Well, I mean, this would be easier if I had the actual color version of this figure, because I'm referring to colors that I've annotated this figure and it's very hard to tell. **04:50:55 04:50:56 04:50:59 04:51:00 04:51:04**

Q. Sorry. What figure? 04:51:05

A. The annotated Figure 4 on page 67. Can you tell me what's green and -- **04:51:06 04:51:08 04:51:13**

Q. I'm asking about paragraph 124. Oh, I see. Page 67. 04:51:13 04:51:16

MR. BORDER: Yeah. 04:51:18

MR. MICHALEK: I see. Can we pull up a color -- I have a colored copy on my computer you can look at. 04:51:19 04:51:21 04:51:22

MR. BORDER: Let's do that. 04:51:24

THE WITNESS: That would be helpful. 04:51:25 04:51:26

MR. BORDER: That printer was black and white. 04:51:27 04:51:28

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MR. MICHALEK: Don't look at anything else. 04:51:33 04:51:34

I'm frozen here. Do you have it, Scott? 04:51:35 04:51:37

MR. BORDER: 124. There it is. There you go. 04:51:38 04:51:47

THE WITNESS: Okay. 04:51:49

BY MR. MICHALEK: 04:51:58

Q. And you might want to look at -- 04:51:59

MR. BORDER: The darker one. 04:52:00

BY MR. MICHALEK: 04:52:02

Q. You may want to look at paragraph 123 too, just to help. 04:52:02 04:52:03

A. Yeah. I mean, I think what I've highlighted in green and labeled "Gatekeeper of Krantz" in Figure 4 of Herrmann, I could refer to the policy integrity server and the network access server. 04:52:06 04:52:07 04:52:09 04:52:11 04:52:16 04:52:19

I'm just saying that there are similar components, and that's an additional reason I think why a person making a combination of the agent of Herrmann adding it to the client device of Krantz would be successful, because there 04:52:20 04:52:22 04:52:27 04:52:29 04:52:34 04:52:36

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are similar components between the two. And I'm highlighting those in those -- in that paragraph. 04:52:38 04:52:41 04:52:43

Q. So to be clear, you're highlighting network access server NAS and policy integrity server in Figure 4 of Herrmann when you refer to, in paragraph 24, such server components in Herrmann are similar to the gatekeeper of Krantz; is that right? 04:52:43 04:52:45 04:52:48 04:52:50 04:52:53 04:52:55 04:52:57

A. Yeah. That's -- that's how it's annotated. And I'm just trying to figure out where I talk about the green -- I thought I mentioned the colors somewhere.

But sure, that's -- again, I'm not relying on incorporating any radius server of Herrmann into -- into the system of Krantz.

It's really about, for this part, the -- adding the security policy agent of Herrmann to the client device of Krantz. 04:53:04 04:53:07 04:53:09 04:53:12 04:53:17 04:53:18 04:53:23 04:53:25 04:53:26 04:53:28 04:53:31

Q. And the gatekeeper of Krantz, is that the radius server 215, one example of the radius server 215? 04:53:34 04:53:37 04:53:41

A. I mean, that's not what I've 04:53:45

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highlighted in green. So I'm really referring to the green network access server and policy integrity server, and that's why gatekeeper of Krantz is in green and those two elements are in green. 04:53:47 04:53:50 04:53:53 04:53:56 04:53:59

Q. Okay. Let's figure this out. 04:54:01

24 says, "Such server components in Herrmann are similar to the gatekeeper of Krantz." 04:54:03 04:54:06 04:54:08

What -- my question for you is: What server components of Herrmann are similar to the gatekeeper of Krantz? 04:54:09 04:54:11 04:54:13

A. I think you're referring to paragraph 124. I heard 24. Maybe I didn't hear right. 04:54:17 04:54:19 04:54:21

Q. I'm sorry. 124. If I misspoke, I apologize. 04:54:22 04:54:24

A. But it's -- what I've annotated in Herrmann Figure 4 are the gatekeeper of Krantz in green being -- you know, I've also highlighted the green network access server of Herrmann as well as the policy integrity server of Herrmann, and those are what's in green. 04:54:25 04:54:28 04:54:31 04:54:37 04:54:40 04:54:43 04:54:45

Next to them are the labels in 04:54:47

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green saying "Gatekeeper of Krantz." 04:54:48

So those are the similar server 04:54:50

components in Herrmann that are similar to 04:54:53

the gatekeeper of Krantz, and that's why I 04:54:56

say that in paragraph 124. 04:54:58

Q. Okay. Let's start there. 04:55:00

What is -- I see two gatekeeper 04:55:02

of Krantzes on Figure -- your annotated 04:55:04

Figure 4? What are you referring to in 04:55:07

paragraph 124 when you say are similar to 04:55:09

the gatekeeper of Krantz"? 04:55:12

A. It's the green highlighted 04:55:14

annotations on Figure 4, which are the 04:55:17

network access server, NAS, and the policy 04:55:19

integrity server. That's why the label 04:55:22

Gatekeeper of Krantz is next to those, and 04:55:26

that's why they're all in green. 04:55:28

Q. So are you saying that the 04:55:29

gatekeeper of Krantz is the policy 04:55:31

integrity server and the network access 04:55:34

server? 04:55:37

MR. BORDER: Objection. 04:55:37

Foundation. 04:55:38

THE WITNESS: That's as an 04:55:39

example. That's why the server 04:55:41

components in Herrmann are similar to the gatekeeper of Krantz, because I also go on to say that Herrmann explains that a network access server, NAS, 320 acts as an access point at, i.e., gateway, to a group of resources or data, e.g., the protected network resources, and accepts requests for access to such resources from client machines." 04:55:42 04:55:45 04:55:46 04:55:48 04:55:50 04:55:55 04:55:57 04:55:59 04:56:01 04:56:03

And that comes from Herrmann at paragraph 53. 04:56:04 04:56:06

And I also show that Herrmann also talks about in paragraph 65, describing the policy integrity server as server side component, and that it may act on communications to determine whether or not the client device 310 is in compliance with applicable security policies, similar to the server of 215 gatekeeper of Krantz. 04:56:08 04:56:10 04:56:14 04:56:16 04:56:19 04:56:21 04:56:23 04:56:25 04:56:28

And that's why I've highlighted those in green, both the network access server and the policy integrity server, in Figure 4 of Herrmann. And that's 04:56:29 04:56:31 04:56:33 04:56:36

why I put the label of Gatekeeper of France -- Gatekeeper of Krantz next to those. 04:56:39 04:56:42 04:56:44

BY MR. MICHALEK: 04:56:45

Q. So I see -- I see -- do you agree with me there's two gatekeeper of Krantzes on the annotated Figure 4? Right? 04:56:45 04:56:49 04:56:51

A. They're acting together, one -- 04:56:53

Q. They're acting together? 04:56:54

A. -- as the access point, and the other as the one that determines whether or not the client device is in compliance. 04:56:55 04:56:56 04:56:58

Q. And then you say, "Such components in Herrmann are similar to the gatekeeper of Krantz," right, in paragraph 124? 04:57:08 04:57:11 04:57:14 04:57:18

A. Well, because Krantz -- well, Krantz does have an access point that is separate, but it's -- it's accepting requests for access -- sorry, in Herrmann, the network access server is accepting requests for access to such resources from client machines. 04:57:19 04:57:23 04:57:25 04:57:32 04:57:35 04:57:37 04:57:40

It's slightly different from the access point, which isn't the one of 04:57:41 04:57:43

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Krantz, but it's a server 215 of Krantz, which is what I've mapped to the gatekeeper of the claim. 04:57:44 04:57:51 04:57:54

So I'm saying that, you know, if you look at the thing that accepts requests for access to resources, that's the server 215, which I've mapped to the gatekeeper of -- which is the gatekeeper of Krantz, but it's not the access point functionality. 04:57:56 04:57:57 04:57:59 04:58:03 04:58:05 04:58:09 04:58:11

It's the fact that the access point network access server is accepting requests for access to such resources that is protected network resources. 04:58:11 04:58:13 04:58:17 04:58:21

And then it's the policy integrity server that acts on the communications to determine whether or not the client device is in compliance with applicable security policies. 04:58:23 04:58:24 04:58:27 04:58:28 04:58:31

And I think that's -- I believe that we've discussed this about the gatekeeper. Maybe the -- maybe that's the other case. But that's a gatekeeper of Krantz. 04:58:33 04:58:34 04:58:36 04:58:41 04:58:45

Q. So in one example, annotated 04:58:45

Figure 4, the network access server, NAS, is similar to the gatekeeper of Krantz, in one example? 04:58:47 04:58:51 04:58:54

A. In one example that it receives requests for access to protected network resources. **04:58:54 04:58:56 04:58:58**

Q. Okay. And in Figure 4, the client device sends data through the NAS to the protected resources, right? 04:59:00 04:59:02 04:59:06

A. That's not really what I'm -- that's saying why it's the gatekeeper. That makes -- the gatekeeper part of it is -- that is the part of the NAS that accepts requests for access to the protected network resources. **04:59:10 04:59:12 04:59:14 04:59:17 04:59:20 04:59:22**

So that's why I'm saying that the NAS is like the gatekeeper of Krantz, because it's the server 215 that's accepting these requests in Krantz, which is why -- one of the reasons I mapped to the gatekeeper, but it's the -- it's the enforcement mechanism or determination of whether the client device is in compliance, which is also why I believe -- you know, I'll refer you to my declaration. **04:59:24 04:59:26 04:59:28 04:59:32 04:59:35 04:59:38 04:59:40 04:59:43 04:59:46 04:59:48**

It says what it says, that that's another reason why the server 215, I believe it talks about that.

We can look at the mapping, but that's -- that's why I highlighted both in green.

Q. Okay. So the -- for the network access server, there's a portion of it that you're saying is similar to the gatekeeper of Krantz as you described. Is that a fair assessment of your testimony?

A. That has some of the overlapping functionality with what Krantz does. It receives that server 215, I believe. We can look in my declaration. It says what it says. I talk about it receiving these requests.

Q. Okay. And then you also have gatekeeper of Krantz next to the policy integrity server, right?

A. Yes.

Q. Okay. And how is that similar to the gatekeeper of Krantz?

A. Well, that's the one that acts -- the communication to determine whether or

not the client device is in compliance with the applicable security policies. And that's another function I think that I -- that I've discussed in my declaration. You can look at it. It says what it says. But just off the top of my head, I've talked about the gatekeeper in Krantz doing. 05:00:44 05:00:46 05:00:48 05:00:51 05:00:53 05:00:55 05:00:57

Q. Your testimony earlier was that one example of the gatekeeper of Krantz would be a radius server, right? 215? 05:01:00 05:01:02 05:01:05

A. I think Krantz does say that server 215 can -- in one embodiment can be a radius server. That's -- we can look at it. I'm pretty sure it says that. We looked at it earlier somewhere. 05:01:08 05:01:12 05:01:15 05:01:17 05:01:20

Q. Wouldn't the radius server 330 in Herrmann be more similar to the radius -- or the server 215 in Krantz? 05:01:21 05:01:23 05:01:26

A. It's the way Herrmann describes the functions of the -- the network access server and the policy server, not just based on the name, because it -- the server of Krantz discusses having these functionalities and the specific functionalities that are similar in 05:01:29 05:01:31 05:01:35 05:01:38 05:01:42 05:01:44 05:01:47

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Herrmann are receiving the request for access to a -- to protected network resources and determining whether the client device is in compliance with applicable security policies. 05:01:48 05:01:52 05:01:54 05:01:57 05:01:59

That's what makes those servers similar. I get that you say that there's this name and that why shouldn't that be, but I don't discuss the function. Herrmann -- I am not citing to the function of that radius server as to why because it's similar to the gatekeeper because I'm citing to the descriptions in Herrmann about the functions of these other blocks and objects in Herrmann that are similar to what the functionality of the gatekeeper of Krantz is doing. 05:02:00 05:02:03 05:02:05 05:02:08 05:02:12 05:02:13 05:02:19 05:02:21 05:02:23 05:02:26 05:02:30 05:02:34

Q. Is it your opinion that the radius server 330 in Herrmann is different than server 215 in Krantz? 05:02:34 05:02:36 05:02:39

MR. BORDER: Objection. Foundation. 05:02:42 05:02:43

THE WITNESS: I mean, if you look at my declaration, I discuss the functionalities of two -- of server 215 05:02:43 05:02:44 05:02:48

with respect to, I think, gatekeeper and how they map. And I'll refer you there to say exactly how. 05:02:50 05:02:52 05:02:56

But some of the functions include, you know, receiving a request for protected network resources and also determining whether the client is in compliance with security policy. 05:02:57 05:02:59 05:03:00 05:03:02 05:03:04

So that's the functionality within the Herrmann specification that points to these two objects I've highlighted in green. 05:03:07 05:03:08 05:03:11 05:03:13

BY MR. MICHALEK: 05:03:13

Q. Is there anything in the Herrmann specification regarding radius server 330 that discusses a functionality? 05:03:14 05:03:15 05:03:19

A. I mean, I don't think I relied on that functionality in Herrmann to show why there's similar devices, and I'm not even incorporating these devices. 05:03:22 05:03:24 05:03:26 05:03:30

What the combination incorporates from Herrmann, at least in this part, is the -- the security policy agent of Herrmann, incorporating that into the client device of Krantz. 05:03:32 05:03:33 05:03:37 05:03:39 05:03:43

And I explain why a person of ordinary skill would want to do that in this section, and that I think -- I think the fact that there are similar devices already in both highlight that it would be a combination that would be successful, because there are similar components in both. 05:03:45 05:03:49 05:03:52 05:03:55 05:03:58 05:04:02 05:04:03 05:04:05

Q. Can you list for me the similar components, all of them, for a network access server 320 in Herrmann to the 215 gatekeeper in Krantz? 05:04:09 05:04:10 05:04:12 05:04:16

A. Wait. Sorry. Can you ask that question again, please. 05:04:17 05:04:20

Q. Sure. Your testimony is that "I think the fact that there are similar devices already in both highlight that it would be a combination that would be successful." 05:04:22 05:04:23 05:04:25 05:04:27 05:04:28

My question is for you to identify what those similar devices are in network access server 320 in Herrmann and server 215 in Krantz. 05:04:29 05:04:31 05:04:38 05:04:41

A. So the functionalities have already been explained. It's similar. 05:04:43 05:04:46

So I think I discussed the gatekeeper server 215 -- 05:04:48 05:04:49

Q. Can you point to me where, I'm sorry, you're reading from? 05:04:51 05:04:53

A. I'm reading from paragraph 124. It's only part of what I'm saying here. 05:04:54 05:04:56

Q. Uh-huh. 05:04:58

A. But I'll refer you to my Krantz analysis about what -- how Krantz maps to a -- any required gatekeeper. 05:04:58 05:05:00 05:05:04

And, actually, I don't remember what we're -- is that part of these claims or was that another claim? Different claim? Let me just take a look. 05:05:06 05:05:08 05:05:10 05:05:13

So the requirement I'm talking about is receiving audit data at a gatekeeper. 05:05:28 05:05:40 05:05:42

Q. I'm sorry. Where are you reading from? 05:05:42 05:05:43

A. That was the -- one of the claim elements. 05:05:43 05:05:45

Q. Okay. 05:05:46

A. I'm not sure if it's 1.3 or 1.4. 05:05:46

Q. Krantz receiving audit data? 05:05:49

A. The claim requires -- maybe it's 05:05:52

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1.4. 05:05:56
The claim requires -- well, I 05:05:59
just call it I. What is this? 1.4 -- 1.4, 05:06:02
receiving the audit data at a gatekeeper 05:06:07
configured to control access to a network. 05:06:09
And so what I'm saying is there's 05:06:12
this audit data which would be used to 05:06:18
determine whether a device is in compliance 05:06:20
with the security policy, and Herrmann 05:06:23
teaches that with respect to policy 05:06:25
integrity server. 05:06:31
That's why that part is 05:06:33
highlighted as related to the gatekeeper of 05:06:34
Krantz. That's why the policy server is 05:06:39
that. 05:06:42
And then there's also a 05:06:42
requirement that receiving the audit data 05:06:45
at a gatekeeper, and that's why this 05:06:47
request -- well, I mean, there are requests 05:06:51
received by the gatekeeper in Krantz, and 05:06:58
that's why that NAS relates to the 05:07:02
gatekeeper functionality of Krantz. 05:07:06
So that's why those are 05:07:08
highlighted in green. I'm not referring to 05:07:09
any specific functionality of the radius 05:07:12

server in this section. **05:07:15**

Q. I understand that. 05:07:16

So if I get a -- if I understand your testimony, the NAS relates to the gatekeeper of Krantz because the requests are received by the NAS server similar to how the requests are received by the gatekeeper in Krantz? That's the similarity? 05:07:17 05:07:19 05:07:22 05:07:27 05:07:30 05:07:33 05:07:34

A. That's one similarity. **05:07:36**

Q. One similarity. What are others? 05:07:37

A. The other similarity is, well, with respect to the integrity -- **05:07:38 05:07:41**

Q. No. Let's stay on NAS first. 05:07:42

A. That's what I focused on for the NAS. **05:07:45 05:07:47**

Q. Okay. Any other similarities with NAS? 05:07:47 05:07:48

A. Not that I talk about in paragraph 124. **05:07:49 05:07:51**

Q. Do you talk about it in any other paragraphs? 05:07:52 05:07:53

A. I mean, I'm looking at a paragraph before and after, so I don't see it -- anything specific there. But I'm not **05:07:59 05:08:04 05:08:06**

using -- the point of this is to say, because Herrmann and Krantz have similar functional components, it's yet another reason why a POSITA would be successful in making the combination, the combination being at least what I discuss in paragraph 126 about adding the security policy agent of Herrmann to the client device of Krantz. 05:08:10 05:08:13 05:08:17 05:08:19 05:08:21 05:08:23 05:08:25 05:08:28 05:08:30

It would already -- it would send to a device. It's sending the audit data. So it would -- it's sending requests. It's not a big -- it's not beyond this -- it's well within the skill of a person of ordinary skill in the art to now have the agent send it to the gatekeeper of Krantz because it was already sending it to a similar device in Herrmann. 05:08:33 05:08:35 05:08:38 05:08:40 05:08:45 05:08:48 05:08:49 05:08:52 05:08:54

And it's well within the skill of a person of ordinary skill to take that combination and send the data necessary for the audit data to the gatekeeper of Krantz, which is determining -- I think I talk about this elsewhere. 05:08:58 05:09:01 05:09:03 05:09:07 05:09:15 05:09:17

I'll refer you to my other 05:09:19

portions of my declaration -- that are determining whether the client device is in compliance with the security policy. 05:09:20 05:09:23 05:09:26

So -- so it would be successful because it's already sending this data to a device. You just have to change it -- send it to the -- you know, when you incorporate the agent into -- 05:09:27 05:09:29 05:09:32 05:09:35 05:09:36

Q. We're not talking about -- this response is -- you can keep going, but I'm -- 05:09:38 05:09:40 05:09:42

MR. BORDER: You asked an open-ended question. He's given you an open-ended answer. 05:09:42 05:09:43 05:09:45

MR. MICHALEK: No, I didn't. 05:09:46

MR. BORDER: What's our time on the second? How close are we to two hours 20 minutes? 05:09:46 05:09:47 05:09:49

THE STENOGRAPHER: Four minutes left. 05:09:52 05:09:53

MR. BORDER: Okay. 05:09:55

MR. MICHALEK: Can I ask my question now? 05:09:56 05:09:56

I was trying to answer your question. Are you going to ask the 05:09:57 05:09:58

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same question or a different question? 05:10:00

BY MR. MICHALEK: 05:10:01

Q. No. My question is, what are the 05:10:01

similarities between the policy integrity 05:10:03

server and the gatekeeper of Krantz? 05:10:05

A. So what I'm saying here is that 05:10:12

Herrmann is discussing that the policy 05:10:14

integrity server, it's a server-side 05:10:16

component and it acts on communications to 05:10:17

determine whether or not the client device 05:10:19

is in compliance with the particular 05:10:21

security policies. And that's what's 05:10:23

similar to server 215, gatekeeper of 05:10:25

Krantz. 05:10:27

And if you want me to spend time 05:10:28

looking for where I talk about that, I can, 05:10:30

but it's in my declaration. And so that's 05:10:32

what's similar with respect to the policy 05:10:36

integrity server. 05:10:38

Q. Okay. Are there anything else 05:10:39

with respect to the policy integrity server 05:10:40

that is similar to the gatekeeper? 05:10:42

A. Not that I see in paragraph 24 or 05:10:44

that I specifically cited to in 124 or the 05:10:47

couple paragraphs before or after that I 05:10:52

see right now. **05:10:54**

MR. MICHALEK: All right. Let's go off. Let me just check my notes. 05:10:56

MR. BORDER: Okay. 05:10:58

(Whereupon, a recess was taken at 5:10 p.m.) 05:10:59 05:12:19

MR. MICHALEK: Back on the record. I tender the witness. Thank you for your time today, Dr. Houh. We really appreciate it. 05:12:19 05:12:23 05:12:25 05:12:27

THE WITNESS: Thank you, as well. 05:12:28

MR. MICHALEK: And no -- 05:12:31

MR. BORDER: No further questions. Or no questions from me. 05:12:32 05:12:33

(Time noted: 5:12 p.m.)

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REPORTER CERTIFICATE

I, JESSICA R. WAACK, Certified Realtime Reporter, Registered Diplomate Reporter, California Certified Realtime Reporter, Certified Court Reporter in New Jersey, New York Association Certified Reporter, New York Realtime Court Reporter and Notary Public of the State of New York, County of Kings, the officer before whom the proceedings were taken, do hereby certify that the foregoing transcript is a true and accurate record of these proceedings; that said proceedings were taken in Stenotype note by me on December 4, 2024, commencing at 9:04 a.m. and ending at 5:12 p.m.

I further certify that present on behalf of CISCO SYSTEMS, INC. And FORTINET, INC., SCOTT BORDER, of WINSTON & STRAWN, and on behalf of INFOEXPRESS INC., JOSEPH KUO, of SAUL EWING LLP.

(Certification continued to next page.)

REPORTER CERTIFICATE CONTINUED

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.

Dated this 10th day of December, 2024, at Kings County, New York.

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DECLARATION UNDER PENALTY OF PERJURY

Date of Deposition: December 4, 2024

I, HENRY HOUH, hereby certify under penalty of perjury under the laws of the State of _____ that the foregoing is true and correct.

Executed this____ day of , 2024, at _____.

_____

HENRY HOUH

SUBSCRIBED AND SWORN BEFORE ME

THIS __ DAY OF _____, 20

_____

NOTARY PUBLIC

MY COMMISSION EXPIRES:_____

WITNESS: HENRY HOUH

Date of Deposition: December 4, 2024

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2. Conform to the facts
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_____

HENRY HOUH

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